



30 January 2019

Prof. Stuart Macintyre AO  
Chair  
Heritage Council of Victoria

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**Re: Registration Hearing – Pompei’s Marine Boat Works and Landing, 557-561 Main Road, Mordialloc**

Dear Professor Macintyre,

The National Trust of Australia (Victoria) (National Trust) is the state’s largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing approximately 16,000 members across Victoria. As Victoria’s premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

This submission is in response to the Executive Director’s recommendation that Pompei’s Marine Boat Works and Landing [Pompei’s] should not be included in the Victorian Heritage Register. The National Trust objects to the Executive Director’s recommendation and submits that the place has historical and social significance at the State Level and reaches the threshold for Criteria A, G and H. Our assessment of these Criterion has been outlined below.

**Criterion A – Importance to the course, or pattern of Victoria’s cultural history**

The Executive Director (ED) has assessed that Pompei’s is likely to be satisfied for Criterion A against the basic test (Step 1) for its clear association with the process of timber carvel and clinker boat building. The ED has found that this process is primarily evidenced at the place via:

1. The timber boats in various stages of repair, signage attached to the buildings, and boat building equipment and materials remaining onsite, and;
2. documentary resources and oral history.

In assessing the place against the basis test for determining state level significance for Criterion A (Step 2), the ED has found that the low intactness and lack of remaining boat building equipment, signage and boats evidenced at the place ‘no longer allows the process of boat building to be better understood than other places in Victoria with substantially the same association’, and as such, Criterion A is not likely to be satisfied at the State Level.

We submit that the ED’s assessment against the criteria for state level is based primarily on the perceived low intactness and lack of remaining built fabric at the site and does not sufficiently assess documentary resources and/or oral history accounts in evidencing the boat

building process at the place. We further note that intangible significance has not been referenced or assessed.

We do not believe that this focus on tangible built fabric (specifically remaining boats, signage and building equipment/materials) considers the ephemeral nature of timber boat building which historically did not require extensive purpose-built or designed buildings but was based on the suitability of spaces near water to allow construction and launching, and the skills and hand tools of the boat builder. We submit that an assessment of the remaining built fabric alongside an assessment of the associated landscape and historical record would more clearly demonstrate the process represented at the place.

Regarding the intangible heritage values present at the site, we note the ideas, designs, methods and concepts involved in boat building, the fostering and preservation of traditional skills that were passed from father to son, and the importance of this to the course of Victoria's cultural history.

In seeking to capture and assess this significance and complexity, we submit that the site should be assessed as a cultural landscape and take in a much broader extent of registration. We note evidence that the shoreline of the creek has been modified to provide boating and recreation facilities, referencing the current shape of the creek bank with its curved stone walls, ramps and jetties. While boat building is no longer carried out at the site, the act of reshaping the natural environment to suit specific activities remains identifiable and could easily be interpreted in a similar way to historic goldfield cultural landscapes.

In this regard, as outlined in the Heritage Council Cultural Landscape Assessment Guidelines, we submit that the cultural heritage significance of the place should assess 'the way people have interacted with the physical environment over time' and how this has produced a 'particular combination of remnant natural features and introduced living elements and structures.'

The ED further concludes that the process of timber carvel and clinker boat building is better understood at Blunts (VHR H1885), which has a higher level of intactness than Pompei's and remains in operation. Given the rarity and ephemeral nature of this typology of place, we do not support the assessment that preserving only the single best example of this type allows the historical importance of boat building to the course of Victoria's cultural history to be readily understood. We submit that Blunts and Pompei's substantially differentiate in scale and form and each play a role in enhancing our understanding of this historical process, one reflecting a nineteenth-century origin and the other a twentieth-century migrant contribution.

### **Criterion G – Strong or special association with a community or cultural group for social, cultural or spiritual reasons**

The ED has assessed that Pompei's is likely to be satisfied for Criterion G against the basic test (Step 1) for its direct association with the boating community in Victoria, the Mordialloc community, and with the community more broadly. The ED has found that Pompei's 'engenders varying degrees of attachment', referencing the boating community 'who are passionate about Pompei boats' (demonstrated through numerous websites) and the nostalgic

attachment of the 'local' community more generally (demonstrated through the Facebook group 'Save Pompei's Landing).

In assessing the place against the basic test for determining state level significance for Criterion G (Step 2), the Executive Director has found that the social significance of Pompei's 'does not strongly resonate beyond the Mordialloc community or Victoria's boating community', and as such, Criterion G is not likely to be satisfied at the State Level.

We dispute the assessment that a broad appreciation amongst the 'boating community', arguably a disparate group of people that reside across Victoria, is insufficient to represent the social significance of the place at the State Level. We submit that the existence of 'numerous websites' acknowledging the craftsmanship of boats built at Pompei's and the contribution the family has made to the boating industry represents a strong association within the Victorian community. We believe that the ill-defined 'boating community' sufficiently represents a 'particular community or cultural group' (as defined in the assessment criteria) with the ability to interpret experiences to the broader Victorian community.

Further, we submit that additional assessment of the Facebook group 'Save Pompei's Landing' should be undertaken before utilising this resource as an argument against the sites site-wide appeal and appreciation. While the ED has assessed that 'posts indicate that members have lived or do live in the area, or are boating enthusiasts', this is not quantitative research that represents the geographical location of each member that has opted to join the group and the significance of their demographics in representing a cross section of the Victorian community.

We submit that Pompei's represents a strong example of this association and does have the ability to interpret this appreciation to the broader Victorian community. While physical remnants of boat building at the site may be limited, it is still readable and evidenced in the associated landscape and historical records and via the existence of boats built at the site and still owned and loved by a section of the community that reside in geographical locations across Victoria.

Further, we do not support the assessment that the social significance of the association between Pompei's and the community 'is better demonstrated through the boats themselves than through the place.' We submit that this argument is akin to attributing exclusive cultural heritage significance to established trees that were propagated at a historic nursery and not acknowledging the significance of the nursery itself. As it would not be feasible or desirable to heritage list all boats built at Pompei's, it makes more sense to acknowledge and preserve the significance of the origin site as representative of the appreciation of Pompei's boats for many people throughout Victoria.

#### **Criterion H – special association with the life or works of a person, or group of persons, of importance in Victoria's history**

The ED has assessed that Pompei's is likely to be satisfied for Criterion H against the basic test (Step 1) for its direct association with the renowned and celebrated Pompei family and with Jack Pompei in particular. The ED has found that this association is evident in the physical fabric of the place through signage and surviving boat building equipment but is 'more evident in documentary resources and oral history'.

In assessing the place against the basic test for determining state level significance for Criterion H (Step 2), the Executive Director has found that this special association 'is reliant on the existence and survival of the signage, boat building equipment, and boats in various stages of repair located around the site', but as the site 'has recently been sold and the materials and equipment associated with boat building are for sale...there is little evidence on the creek side which demonstrates the legacy of the Pompei family in a tangible way'. As such, the ED has assessed that Criterion H is not likely satisfied at the State Level.

As critiqued in our assessment of Criterion A, we do not support the assessment that tangible built fabric should be more highly weighted than significance derived from documentary resources and/or oral history. We note that the criteria to satisfy Criterion H define evidence in the physical fabric AND/O documentary resources AND/OR oral history.

Similarly, the ED repeats the argument referenced in the assessment of Criterion G that the association between timber boat building and the Pompei family is 'arguably better demonstrated and more readily appreciated through the many boats they constructed'. We submit that this assessment does not represent best practice application of the criteria guidelines and that similar requirements are rarely made for other places. For example, there are no original signs or work demonstrating the association of the Kelly family with the Beveridge House or connection with Barunah Plains with the Russel family. We submit that it should be the place itself and its history that demonstrate a special association with the life or works of a person of importance in Victoria's history and not physical signage or historic markers.

## **Conclusion**

Thank you for the opportunity to provide comment regarding the proposed inclusion of Pompei's Marine Boat Works and Landing. As outlined in our submission through an assessment of Criterion A, G and H, we do not support the recommendation of the Executive Director that the place should not be included as a registered place. We submit that while the place clearly has historical and social significance at the local level, we believe the threshold for significance at the state level has also been met, supported by historical evidence and self-evident in the reaction and support of the broader community. We believe the cultural heritage significance of the place should be captured and recorded by designating a cultural landscape inclusive of the buildings and river works, slipways, boat ramps, jetties, riverbank walls, associated sheds and sculpture.

Please get in touch with this office on 9656 9837 if you have any questions or concerns regarding the above.

Kind Regards,

Felicity Watson

Advocacy Manager

National Trust of Australia (Victoria)