

APPLICATION FOR A REVIEW OF THE HERITAGE VICTORIA NOMINATION REFUSAL

June 11, 2024

Heritage Victoria Nomination Refusal was received by email, May 15, 2024, 3.13pm.

Heritage Victoria assessed the Save the Beaconsfield Reservoir Action Group's (SBRAG) Nomination of the Mornington Peninsula Water Supply Scheme (MPWSS) as not meeting the threshold of State-level significance.

SBRAG contends that this REFUSAL is incorrect.

- Close reading of the Heritage Victoria analysis and assessments leads us to conclude that clarification is required and we respectfully request a Review of the Refusal.
- Below, SBRAG addresses the Heritage Victoria commentary, presenting information to justify this request for a Review.

Since receiving the Refusal, SBRAG have also become aware that professional assistance we commissioned to prepare the Nomination, proved to be deficient. For example - **Criterion G** was completely omitted and some technical assessments proved to be ill-informed, less than satisfactory or wrong. We would be grateful for your consideration in these regrettable matters as part of the Review process.

Criterion A Importance to the course, or pattern, of Victoria's cultural history.

Heritage Victoria Commentary:

The Nomination states that MPWSS contributed to the development of burgeoning seaside towns by providing a sufficient water supply to multiple towns along the Mornington Peninsula, and that it also contributed to the training of Australia's navy at Crib Point.

The design and construction of water supply systems has been essential to settlement and urban development in Victoria. It is the nature of essential services that they support the growth of communities and the MPWSS is not remarkable in this regard. The test for State-level significance under this criterion is whether a place or object allows a phase of Victoria's history to be better understood than other places or objects with the same association. The Executive Director is of the view that there are other places that have a greater ability to enable understanding of the role of water supply in supporting urban development. In particular, the Maroondah Water Supply System is listed in the Victorian Heritage Register (H2381) for its contribution to the continued growth and development of Melbourne. This example, operational from 1891, has a degree of integrity and intactness that enables its historical associations to be well understood.

Having carefully considered the commentary on the Refusal (above), SBRAG members concluded that the Heritage Victoria analysis appears to indicate a misinterpretation of the salient, complex and interrelated elements within the SBRAG Nomination of MPWSS. ie, How and why the MPWSS stands apart from other earlier or contemporary water schemes.

Other water schemes cited by Heritage Victoria are, in fact, *not relevant* in assessing this Nomination at all. SBRAG will argue that there are legitimate grounds for reconsidering the Refusal of this Nomination.

The Heritage Victoria analysis and commentary, in essence, simplistically and inaccurately reduces the Nomination to a comparative technical analysis of various water schemes in Victoria.

This is certainly not the basis of the SBRAG MPWSS Nomination. Heritage Victoria fails to recognise that the basis of the MPWSS Nomination is, in fact, its unique role in Victoria's Naval heritage.

There are no comparable water schemes in Victoria which were designed and established to specifically enable and enhance Australian and Victorian Naval defence capability.

The significance of the MPWSS lies in its *purpose* in reliably supplying sufficient potable water necessary to establish and expand Flinders Naval Base, later known as HMAS Cerberus. The significance of MPWSS and, of course, this Naval Base to the maritime heritage of Victoria and Australia is irrefutable. The *purpose* of the MPWSS was to enable the crucial coastal defence and training Base for the Navy.

Note that in 1912, the Prime Minister Andrew Fisher officially requested the MPWSS be established. This is shown in two attachments as evidence of the MPWSS's vital role in delivering potable water to underpin the establishment and on-going operations of the Flinders Naval Base/HMAS Cerberus.

The primary purpose of MPWSS, as directed by the government of the day, was to address national naval security. The absence of reliable access to potable water was a security matter, which no doubt would have affected ongoing operations of the Naval Base. Concerns within the newly formed Federal Government regarding Australia's vulnerability to invasion, heightened towards the outbreak of WW1 in 1914. As a consequence of this threat, the development of MPWSS and construction of the Flinders Naval Base became imperative to the defence of Australia, and in particular, Victoria.

This Naval Base remains significant to Victoria's defence, as it is still operational and continues to serve the nation as the sole Victorian Naval Base.

Whilst the MPWSS also had a role in the urban development of the Mornington Peninsula, this role, although important, is not related to its defining historical *purpose* or *significance*, or *SBRAG's Nomination*. The MPWSS's crucially important delivery of potable water to Crib Point Reservoir, via Beaconsfield Reservoir and Tarago Reservoir, together with the other subsidiary water basins needed for urban areas, for example Frankston, Bittern and Dromana Reservoirs, made the most significant contribution to both Naval and urban growth on the Mornington Peninsula. Given there was no alternate potable water source, the MPWSS was required to extend 100km plus in distance from the Tarago River water source. A greater distance than was required of the Maroondah Water Supply System.

Heritage Victoria references to the Maroondah Water Supply Scheme, and other water supply schemes are irrelevant. There is no point of comparison with these schemes in relation to the heritage significance of the supply of water via the MPWSS, to the Flinders Naval Base/HMAS Cerberus, which is the basis for its Nomination.

The Heritage Victoria analysis reveals a persistent and regrettable comparative approach in relation to water supply scheme *infrastructure elements*, with no reference at all to the *purpose of the schemes*. Heritage Victoria refers to civil engineering elements at considerable length, while making scant reference to the notable and vital heritage significance of MPWSS. In doing so Heritage Victoria appears to have missed the very basis of the Nomination.

Although complex heritage infrastructure assets, such as water supply schemes, will obviously have construction technicalities in common, water schemes do not necessarily share a common *imperative* or *purpose*.

In the case of the MPWSS, given the paucity of potable water accessible to Crib Point on Mornington Peninsula, and the urgent need to establish a Naval Base, its *purpose* is its unique point of differentiation. There is ample evidence that the MPWSS was perceived by all levels of government as having this *crucial and unique purpose*.

Heritage Victoria's refusal states that "*The test of the appreciation or value of any place or object is whether it creates an interest or excitement in the public*". And yet Heritage Victoria also cites, and applauds, other particular water schemes as having "*a degree of integrity and intactness that enables its... historical associations to be well understood*." Heritage Victoria apparently elects to ignore, or is simply unaware, that in relation to the MPWSS, the public is already cognisant and already engaged. This Nomination clearly reveals that a *cultural association* already exists in places where Public Access is permitted to view the MPWSS. Obviously, this can only occur where the public have been granted access. For example, the Cardinia Aqueduct Trail in Officer, which is a public walking trail, the Devilbend Natural Features Reserve (formerly Bittern Reservoir), managed by Parks Victoria. Regrettably, Melbourne Water has closed public access to Beaconsfield Reservoir (MPWSS). Nevertheless,

the local community continues to press Melbourne Water to permit public access to this historic reservoir and important section of MPWSS.

SBRAG argues that by State Heritage Listing MPWSS on the Victorian Heritage Register, it will also result in greater public awareness and understanding of MPWSS infrastructure already accessible in the public realm. For example, public access to Beaconsfield Reservoir which is a fine example of an early 20th Century compressed earth Dam wall, together with informational signage about the history of the MPWSS would expand public awareness and education.

SBRAG is confident that State Heritage Register Listing will be a strong signal to the unique heritage value of the MPWSS in the public realm. Listing will also serve to deter further ill-informed degradation of this historic Victorian asset. Inclusion of the MPWSS on the State Heritage Register will facilitate public education and inform future generations of the MPWSS, and thus ensure preservation of its unique legacy.

Criterion C

Potential to yield information that will contribute to an understanding of Victoria's cultural history.

Heritage Victoria Commentary:

The nomination states that MPWSS is an example of consultation and negotiation between the Commonwealth and the State over the need for a water supply scheme to the Navy Base and surrounding community.

For a place to be of State-level cultural heritage significance under this criterion it must have the ability to yield knowledge of significance to Victoria via investigation of its physical evidence and be of sufficient integrity. Whilst the state and commonwealth records of the time may provide information about government relations at the time, it is not considered that this information is likely to be revealed in the physical fabric of MPWSS.

SBRAG is baffled at the inconsistencies within Heritage Victoria commentary.

Heritage Victoria acknowledges that the MPWSS is unique amongst the supply schemes of the time. In fact it is the only water supply scheme executed on the direction of all three levels of government, being ordered by Prime Minister Andrew Fisher in 1912, and executed by the Victorian Government through Premier William Watt, Water Supply Minister George Graham, and the Mornington Peninsula Council. It is suggested that this is the earliest case of all three levels of government collaborating on a vitally needed water supply system.

Without this historic collaboration between three levels of government, this water supply scheme would not have been possible. Initially it enabled the development and continued usage of Victoria's Flinders Naval Base, later renamed HMAS Cerberus,

which has enabled Victoria to play a significant role in Australian Naval cultural history. Obviously, MPWSS also played a role in the agricultural, fishing, holiday and tourism culture on Mornington Peninsula.

Heritage Victoria assessment then proceeds to reverse its recognition of historical significance of MPWSS, stating: “*Whilst the state and commonwealth records of the time may provide information about government relations at the time, it is not considered that this information is likely to be revealed in the physical fabric of MPWSS.*” SBRAG refutes this dismissive reference to the physical aspects of the MPWSS as inaccurate.

SBRAG seriously questions the rigor of the inspections of the physical network - dams, channels, tunnels, syphons, flumes, and culverts etc. which led to this inaccuracy. There is ample evidence that the physical condition of MPWSS is not as described by Heritage Victoria at all. The reality is that there are intact sections of physical fabric that still remain. Heritage Victoria appears to have made a speculative assessment which does not relate to the historic significance of the entire MPWSS, which is the basis of this Nomination, namely its *purpose*.

The “*physical fabric*” of MPWSS is still evident, but needs appropriate information signage, capable of allowing public understanding of its unique function and *purpose*.

SBRAG also questions whether Heritage Victoria is aware that the earliest form of long-distance pipes employed on the MPWSS were 12 inch wood stave pipes, which operated for some 20 years, competently delivering water during that time, until the largely in-tact network was ‘replaced by incorporating current technology concrete pipes.

Heritage Victoria may not be aware that there was no technical deficit in the engineering design of the Dam Wall and it operated without mishap for 70 years. It was simply replaced by a much larger supply dam, Cardinia Reservoir which is 270 times greater in size (270,000 megalitres vs 912 megalitres) and was constructed 60 years later with newer infrastructure.

SBRAG respectfully requests that Heritage Victoria undertake a site visit to The Aqueduct Trail in the towns of Officer and Beaconsfield. Such a visit will reveal open channels and syphons, and physical evidence also at various other related MPWSS reservoirs, namely Tarago, Beaconsfield, Bittern (Devilbend Natural Features Reserve), Frankston, Dromana and Crib Point.

Contrary to the Heritage Victoria commentary, SBRAG contends that, the primary basis for the SBRAG Nomination relates to the *purpose and not the physical significance* of the MPWSS. This does not mean that the multiple intact physical elements integral to the historical significance of MPWSS do not exist.

Please note that SBAG, which is a non-profit volunteer-led organisation, cannot afford to commission a professional investigation of the physical elements of the MPWSS. That said, as we are 'local' and 'familiar' with '*physical fabric*', our experience is that in areas open to the public, '*physical fabric*' MPWSS remains and furthermore, it is sound.

Our hope is that a Review will lead to a successful Nomination for State Heritage Register Listing. This will produce greater academic scholarship research, educational awareness and popular interest in the unique aspects of the MPWSS.

Criterion D

Importance in demonstrating the principal characteristics of a class of cultural places and objects.

Heritage Victoria Commentary:

The nomination states that MPWSS is a near complete example of an extensive and complex twentieth century water supply scheme, and one that facilitated the development of a training base for the Australian Navy and a flourishing community of residents and holiday makers on the peninsula. The Executive Director agrees that MPWSS is an example of a twentieth-century water supply scheme, however the State-level test for Criterion D is whether the place is a fine, influential or pivotal example. Whilst MPWSS has the characteristics of a water supply system, it is not of equivalent quality or historical relevance than other examples in Victoria. The Coliban Water Supply System (H1021) is a historically important engineering system designed to bring water to the City of Bendigo which commenced operation in 1877. The Coliban system is one of the earliest water supply systems in the state. It is a vast, gravity operated, open channel water supply system which supplied water for both domestic and irrigation purposes and demonstrates significant technical accomplishments in transporting water through difficult terrain.

There is no known evidence that the design, technology or materials used in MPWSS influenced subsequent systems, or that MPWSS is a pivotal example in the evolution of water supply systems. The Yan Yean Water Supply System (H2333) provides rare evidence of the evolution of engineering practices and techniques in the mid to late nineteenth century, and incorporates early technical elements such as in-line pressure reducing valves and engineered cascades to aerate incoming water that are not found in other systems in Victoria or Australia. It is considered that the design of the Yan Yean system influenced that of the Coliban system which it predates, and later systems such as Ballarat.

SBAG refutes the conclusion drawn by Heritage Victoria that the MPWSS does not satisfy the required criteria for State Heritage Register Listing while persistently focusing on elements in water supply scheme which relate to merely civil engineering, construction and efficiency.

Heritage Victoria persists in adopting a 'comparative' approach to assessing the heritage value of heritage infrastructure when the MPWSS by its very purpose, is unique. It is the only water supply scheme involved directly in Victoria's defence between WW1 and WW2. To ignore this significant aspect is inappropriate and irrelevant.

MPWSS stands alone in relation to cultural relevance. This gives it greater prominence and justification for heritage preservation and protection than of the other multiple water schemes raised repeatedly by Heritage Victoria. Its crucial purpose was purely to provide potable water for a culturally significant place in the defence of Victoria and Australia (HMAS Cerberus).

The Heritage Victoria statement that the MPWSS "*is not of equivalent quality or historical relevance than other examples in Victoria*" is incorrect or a misinterpretation. Given that (a) site inspections appear not to have occurred, and (b) the *purpose* of the scheme is not properly understood, or (c) comparable to any water scheme in Victoria, the Heritage Victoria statements regarding MPWSS are questionable. The MPWSS is a largely intact water system - a fine example of an early Victorian water supply scheme, with a unique heritage value, built for a specific '*purpose*'. It may still be seen today together with the Naval base it was established to support.

The MPWSS is, in fact "*a pivotal example in the evolution of water supply system*" in being designed specifically for national defence purposes. Stated simply - Other water supply schemes cited by Heritage Victoria were *not*. Without MPWSS in the early 20th Century, there would *not* have a permanent means to access a constant and reliable water supply to the Peninsula, and the Naval Base. Urban development would largely *not* have existed without its inception and implementation.

The MPWSS was indeed *influential* in the growth and continual use of the Flinders Naval Base/HMAS Cerberus. Again, without the provision of a constant and reliable water supply to the Peninsula the base could not have been a viable location for the Federal Government's ultimate goal of providing a vital coastal defensive facility. It provided defence and offered confidence to the State of Victoria in time of war.

Criterion H

Special association with the life or works of a person, or group of persons, of importance in Victoria's history.

Heritage Victoria Commentary:

The nomination states that MPWSS involved the technical expertise of people such as municipal engineer Albert Keaston Trenavin Sambell, and the endorsement of political leaders, Premier William Watt and Prime Minister Andrew Fisher. The Executive Director concurs that the place has an association with these notable people.

However, the MPWSS as it stands today does not allow this association to be readily appreciated as is required to meet the threshold for State-level significance.

SBRAG finds Heritage Victoria's commentary stating that "*does not allow this association to be readily appreciated as is required to meet the threshold for State-level significance*" irrelevant. Evidence which refutes this assessment has been provided.

Heritage Victoria itself refers to the MPWSS as clearly associated with significant historical figures that have shaped our State and Nation. These notable people were leading politicians in the Commonwealth's and Victoria's Governments. Prime Minister Andrew Fisher three times (1908-09, 1910-13 and 1914-15), and Victorian Premier William Alexander Watt, elected Premier twice (1912 –14) and served as Victoria's Treasurer twice (1909 –1914). PM Andrew Fisher's position was uniquely significant as the only Prime Minister until that time to have foreseen the need to reinforce the nation's security stance against perceived threat of naval incursion. As a result, he urged the construction of MPWSS to guarantee the continuation of a Naval presence in Victoria.

Indeed, it was two years after this order that the very first shots of WW1 were fired from the Point Nepean Fort, which was also part of the MPWSS. Premier William Watt also served as the State's Treasurer and his position may have been pivotal in hastening finances directed at efficiently arranging construction of the MPWSS, which was completed very quickly within 2 years from 1916 - 18.

The significant decision to locate the Flinders Naval Base/HMAS Cerberus at Hanns Inlet/Crib Point was first recommended by the distinguished British Admiral, Sir Reginald Henderson KCB RN in his "*admirable report of March 1911 upon which the organisation of the Royal Australian Navy, established later in that year, was chiefly modelled.*" (Quote from Royal Navy obituary in the Times newspaper, July 13, 1932). The importance and value of HMAS Cerberus to Australia's and Victoria's defence, and its very existence was based on the essential supply of potable water from the MPWSS cannot be overestimated. The site for HMAS Cerberus Base was first recommended by Admiral Sir Reginald Henderson KCB RN after an extensive search of the Australian coastline to find suitable locations for major naval bases (Quote from "A Brief History of HMAS Cerberus", June 1999 edition of the Naval Historical Review). "Without the upgrade in a water supply reliance on barrelled water delivered via ship and train was a concern." Quoted from (Chapter 3, Page 9, "Naval Base and Mornington Peninsula Water Supply Scheme", Clarrie Talbot, 2006). Water supply remains a precarious matter in times of conflict, and Victoria's history would be vastly different if an invasion had occurred and the naval base had been ill prepared or non-existent. The MPWSS delivered reliable gravity-fed clean drinking water and became the major water source for hundreds of thousands of residents in Mornington Peninsula.

Further, the SBRAAG Nomination, also refers to other notable Victorians associated with the MPWSS, for example, Albert Keaston Trenavin Sambell, 1879 -1936, born in Violet Town, Victoria. *“Mr Sambell was the Engineer for the Shire of Mornington and Consulting Engineer to other nearby Shires.”* (Quote from Chapter Two, Campaign for a Water Supply Scheme – Mornington Peninsula, *“Naval Base and Mornington Peninsula Water Supply Scheme”*, (Clarrie Talbot copyright Clarrie Talbot 2006)

Given that Victoria is not generally understood to be at the forefront with regard to funding, preserving of heritage, and in particular the social and cultural heritage, it comes as no surprise that understanding and appreciating the unique role of MPWSS is poor. Unfortunately, this deficit is exacerbated by the MPWSS being largely under the control of Melbourne Water, a state agency focussing on water supply – not heritage assets. Consequently, preservation of Beaconsfield Reservoir which is an asset within MPWSS is under threat.

Melbourne Water has adopted cost-effective policy over decades of incrementally decommissioning, degrading and ultimately closing Beaconsfield Reservoir. Its policy of denying public access continues to meet strong public condemnation. When Melbourne Water deliberately prohibits public access and provides no heritage signage, it is nonsensical for Heritage Victoria to claim, that the MPWSS, including Beaconsfield Reservoir has, *“as it stands today, ... not to be readily appreciated”* The absence of public access or informational signage are not valid grounds for the Nomination Refusal by Heritage Victoria.

State Heritage Listing will clearly enhance public recognition of, and awareness about, the entire MPWSS. Heritage Listing may actually trigger policy reform by Melbourne Water or other relevant Shires and Councils which have to date been less than effective in recognising historical and heritage value. Listing will encourage opportunities for even more elements that are remaining in the MPWSS system to be identified, understood and preserved.

Greater public access to public lands currently denied by Melbourne Water, will counter the public ignorance of heritage infrastructure, which is in the State and National interest.

The crux of the issue is that Heritage Victoria has misinterpreted or simply misunderstood the nomination. It is not about water scheme comparisons. It is about how this water scheme made a unique contributory role in Victorian maritime heritage.

Criterion G

Strong or special association with a particular present day community, or cultural group for social, cultural or spiritual reasons.

Please note: Omission of Criterion G from the original Nomination.

Since receiving the Refusal, SBRAG has become aware that Criterion G (2019) was inexplicably omitted by the history consultant commissioned to assist with our Nomination. This was indeed disturbing to members. Regrettably we appear to have been too reliant upon profession expertise. Our committee has gained greater expertise and understanding of the Nomination process from needing to address the Refusal. SBRAG trusts that information below will be accepted and considered at this point.

SBRAG contends that in relation to “[present day community, or cultural group for social, cultural ... reasons](#)” the Nomination in itself, the fund-raising which enabled it, and the contribution made by stakeholders and member with heritage research efforts, are clearly evidence of SBRAG members having connections with, and support of the “[present day community](#)”.

In addition, thousands of residents and community members who live in the region - Cardinia and adjacent Shires, that have been encountered as the SBRAG Nomination campaign grows, have revealed that a vast amount of people have a long ‘[social associations](#)’ and connections with the MPWSS. As stakeholders, they understand various elements which make up the scheme. For example, the Cardinia Aqueduct Trail, an element of the MPWSS, enjoys high levels of visitation and has a particularly strong resonance and appeal within the community from – Cardinia Council, to locals and visitors alike.

The local community of the town of Officer have a particularly strong understanding and connection. A poignant example of this is 5th generation Officer resident, SBRAG Committee member and Chairman of the Officer and District Community Association, the Late Rob Porter OAM, who read aloud from his ancestor’s memoirs to our SBRAG committee. Rob also referred to his childhood days on and around Beaconsfield Reservoir and swimming in the Cardinia Aqueduct on hot days.

Until Melbourne Water denied public access, Beaconsfield Reservoir was a ‘social magnet’ attracting many visitors from as far afield as Melbourne. In the early 1900’s, visitors arrived by train alighting at Beaconsfield Railway Station or Officer Siding Station before walking or taking a wagon the 4 kms.to the Reservoir for the day. In the 1950’s and ’60’s SBRAG member families have fond memories of visiting Beaconsfield Reservoir before the 1970’s 8 foot high chain mesh fence and locked gates were installed.

In relation to [cultural associations](#), evidence that this Nomination really matters for maritime and heritage stakeholders throughout Victoria is clear. Given the MPWSS maritime significance’ it is not surprising that SBRAG has liaised extensively with the Melbourne Maritime Heritage Network and with the Australian Heritage Advocacy Alliance and with the Royal Australian Navy. Further, SBRAG has also reached out to the Public Records Office of Victoria and Westernport Water.

Concluding comments regarding the initial submission of the Nomination

After the initial disappointment of the Heritage Victoria Refusal, the SBRAG committee began to closely and more critically reassess the content of the Nomination submitted on our behalf by a professional historian. We commissioned Emma Russell, Director, *History At Work* Project Team. Contact with SBRAG was infrequent and we can only presume the actual work was delegated. We concluded that certain pertinent elements were overlooked, or possibly omitted from the submitted Nomination.

These omissions, inaccuracies and misrepresentations may have contributed to Refusal of the Nomination by Heritage Victoria. If the Refusal process allows, we respectfully request that these are now considered in the Review by the Heritage Council.

Points for consideration:

At the conclusion of the Nomination, under the heading, *Property Condition*, the SBRAG Committee seriously disagrees with the assessment put forward by History At Work ie. “*Condition Rating of the MPWSS is ‘Fair’*”. SBRAG became aware after the Nomination was submitted that no site inspections were conducted and fear that the HV assessment was based upon lack of relevant knowledge in the field.

SBRAG Committee, however, has relevant specialist professional engineering knowledge from a highly qualified Large Dams Expert,

Robert C. Evans, Dip. C.E. MIE Aust, Past Secretary, ANCOLD, 1994-97, Senior Engineer, Hydraulic Structures, SMEC. (Retired)

who has assessed the overall condition of the Dam Wall as “Good”. Members of SBRAG have also visually assessed the Dam with MW on occasion. Unfortunately, “History At Work” have not conducted a full site inspection of the entire MPWSS.

We wish to expand on Heritage Victoria’s concern regarding “*How much of the original form or appearance remains?*” For example, the Cardinia Aqueduct Trail has not been mentioned, which survives to demonstrate an example of the functional engineering of the system of water delivery. This ran from Tarago Reservoir to Beaconsfield Reservoir, a distance of approximately 50 Kilometres, and is also in “Good” condition. Beaconsfield Reservoir has only been vaguely mentioned, and should have been noted that it is in “Good condition”. The section of Aqueduct inside the Beaconsfield Nature Conservation Reserve, leading to the inflow of Beaconsfield Reservoir is in “**Very Good**” condition. The Bittern Reservoir (Devilbend Natural Features Reserve) which has public access and Frankston Reservoir are themselves in “Very Good” condition, therefore major elements of the MPWSS to our knowledge are in a “**Good to Very Good**” state. We have not sighted the Tarago Reservoir, Dromana or Crib Point Reservoirs, so an accurate opinion cannot be mentioned, but

they are still intact and if a full site assessment can be arranged, as it should for accuracy, that will give irrefutable evidence of the **actual** condition of what remains.

Under the sub heading referring to **“Threat”**, the listing, *“Is the deteriorating condition of the place /object posing a threat to its intactness or integrity?”*, Regrettably and erroneously in the Nomination, the response should have read **“No”**. SBRAG Committee expert on Large Dams, Robert C. Evans assessed the Beaconsfield Reservoir during a site inspection with Melbourne Water engineers and GHD engineers. There was no agreement that the integrity of the Dam wall existed as a threat. Unsubstantiated assertions made on this matter by the engineers were unable to be justified, or offer proof or show evidence of the assertions,

SBRAG committee concurs with the final statement of History At Work *“Please provide any additional details about the threat”*. We conclude in the absence of any credible proof of ‘threat’, that Melbourne Water appear to have little interest in conservation or preservation of MPWSS’s heritage assets.

Dear Heritage Council,

Due to technical issues, created by Heritage Victoria, I was unable to submit the Request for a Nomination review on the 28th day, which should have been automatically accepted, but was rejected. The issue was that Heritage Victoria wrote the Refusal of the Nomination application, “R11649, Place name : MORNINGTON PENINSULA WATER SUPPLY SCHEME...” on 14/05/2024, but then emailed the correspondence to me at hdjensen8@bigpond.com the next day on 15/05/2024 at 3.13 PM. According to Heritage Victoria’s correspondence within the Refusal email, the statutory 28 days actually start when I receive the email, which was May 15th at 3.13PM. However, it appears in this instance, that the 28 days had begun on May 14, when the email was written. SBRAG took full account of the instructions on Heritage Victoria’s Refusal and intended to submit the Review Application on Tuesday June 11, 2024, 28 days precisely from receiving Heritage Victoria’s Refusal. 28 days was the stipulated period to organise a Nomination Review submission to the Heritage Council.

This concludes the SBRAG request for a review of the Nomination.

Sincerely,

Harry Jensen

President, Save the Beaconsfield Reservoir Action Group