

13 January 2017

Mr Steven Avery
Executive Director
Heritage Victoria
By email: heritage.permits@delwp.vic.gov.au

Dear Mr Avery

VHR0703 Former Hoffman Brickworks: Permit Application P27923

I am making this submission as a person with a long involvement in heritage and history in Brunswick, having been involved in the original nomination of this place to the Register, as the principal author of *Keeping Brunswick's Heritage Study*: a report on the *Review of the Brunswick Conservation Study* (1990), as an 'interested party' in the original agreement that enabled rezoning of the site and started the redevelopment process, and as a continuing member of Save the Brickworks Inc.

This submission is an objection to the proposed demolition of Buildings 5 and 6 for the purpose of redeveloping the site for a small interpretation/commercial building and a 7-8 storey residential building on the following grounds:

1. The demolition of Buildings 5 and 6 would result in the total and permanent loss of its cultural heritage significance.
2. The demolition of Buildings 5 and 6 would have a severe, irreversible impact on the cultural significance of the Former Hoffman Brickworks, which in turn would have a significant impact on the cultural heritage of the State of Victoria.
3. The application fails to demonstrate that structural remediation is not possible; to the contrary, the application includes a report by a well-respected structural engineering firm that confirms the possibility of structural repair.
4. The structural issues described in the application are attributable in whole or part to the continuing neglect by the applicant, including the failure to undertake works to stabilise and protect the building following the permitted demolition of the northern section and Building 7 to the west (and contrary to the structural engineering advice provided to the applicant by their own structural engineers).
5. The application fails to disclose the 1998 structural engineering report by The O'Neill Group which demonstrates a decline in the condition of the buildings during the applicant's period of ownership and management.
6. There is no evidence presented that Building 5 and 6 are of any lesser significance than when entered into the Victorian Heritage Register.
7. The application fails to consider alternatives to complete demolition that would enable the applicant to fulfil the requirements of existing approvals and their own commitments and plans, including the development of an Interpretation Centre as documented in the Interpretation Concepts and Overlay (Look Ear Pty Ltd 2006, 2010 respectively).

8. There is no evidence presented as to the extent of or options for remediation of the stated contamination, with the accompanying advice from Compass Environmental indicating what is not known rather than what is. It is understood that the applicant has undertaken a contamination study across the whole site as well as audits associated with specific components of the site, and yet the potential contamination within Buildings 5 and 6 is presented as though it is 'new' information and as though it now requires a different outcome than what has been agreed for more than 20 years.
9. The application is accompanied by a Heritage Impact Statement which is inadequate in numerous ways, including for its failure to address both structural engineering reports rather than just one report, its failure to assess in a specific and detailed way the impact of the total and permanent loss of Buildings 5 and 6 on each and every aspect of the cultural heritage significance of the place, and its failure to consider the heritage impacts associated with the loss of interpretive experiences within the 'real' place where brickmaking occurred for more than 100 years.

Further, the applicant has consistently failed to comply with legal requirements established under the Heritage Act and through permits issued by Heritage Victoria. The applicant has consistently sought to defer, delay and avoid the heritage responsibilities embodied in reports that they have commissioned [e.g. the *Conservation Management Plan* (1999) and *Additional Research* (2000), *Interpretation Plan* (1999, 2002), *Interpretation Concepts* (2006) and *Interpretation Overlay* (2010)] as well as in the development plans and approvals that the applicant has initiated and/or been a party to.

The applicant has failed to provide proper care and maintenance for Buildings 5 and 6 to the extent that their inaction and neglect have resulted in additional and avoidable damage to these buildings.

I would be happy to elaborate on my objections on request.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Johnston', written in a cursive style.

Ms Chris Johnston