

12 January 2018



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The Executive Director
Heritage Victoria

Via email heritage.permits@delwp.vic.gov.au

RE: Permit application P27923 for demolition of building 5 (brick Pressing Shed) and 6 (Former Engine Hose) construction of new building including an interpretation facility and relocation of the edge runner mill

Dear Executive Director,

I am writing to make a strenuous objection to the granting of this permit which fails, in my view, to conserve the State level significance of the Hoffman Brickworks and therefore if granted will result in the irretrievable loss of a key part of Victoria's heritage.

I am very familiar with the Hoffman Brickworks site. I inspected the site several times when it was still working. In July 1988 while employed at the Victoria Archaeological Survey, I was asked to prepare an assessment of the site for the then Historic Buildings Council of Victoria. Subsequently, I worked as part of the project team for the Conservation Management Plan and specifically contributed additional research on Buildings 5 and 6 both for HLDC. Later I was involved in conservation planning for movable cultural heritage items.

I have also published on the Hoffman brickworks in refereed journals nationally and internationally, as well as more generally on the history of Victoria's Brickmaking industry and on brickmaking in Bendigo. I have visited a number of brickworks around Australia and internationally as well as assessing a number of brickwork sites in New South Wales.

I am generally regarded as being one of the leaders in the area of industrial archaeology/heritage in Australia. I am on the Board of The International Conference on the Conservation of Industrial Heritage (TICCIH). I am a full member of ICOMOS and of the Professional Historians Association.

Dr Iain Stuart

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Therefore I am very familiar with the history of the Hoffman site and with best practice for heritage conservation of industrial sites.

Firstly I would note that the Heritage Impact Statement does not fully explain the significance of the building to be demolished

The Guidelines for Heritage Impact Statements require consideration of

The cultural heritage significance of the place or object, including setting and any archaeological values or potential (relates to s.73(1)(a) of the Heritage Act)

Provide summary from the Statement of Significance and Conservation Management Plan (where relevant). Refer to the Victorian Heritage Inventory for archaeological information, where relevant.

However the HIS looks at the Heritage Victoria listing as well as the National Trust listing and oddly the redundant Register of National Estate listing. The HIS fails to make use as required of the more extensive discussion of heritage significance of the site in reports such as my initial assessment where the unique characteristics of the brick press building were identified and the Conservation Management Plans for the site both the Allom Lovell plan and the one prepared by the HLCD team both of which identified the importance of Building 5 and the brick presses within it.

I would have expected a clearer discussion of the heritage values of Building 5 and 6 and their contents and how they related to the overall significance of the Hoffman Brickworks as a whole.

I would have expected a HIS to go into these matters in greater depth to explain the history of the listing and why despite years of promises and agreements we are now in a position where a key part of the site is proposed for demolition.

The Brick Press Buildings are specifically mentioned in the curtilage for the Victorian Heritage Register listing and the Statement of Significance for the site in Victorian Heritage Register listing for the property inner alia notes:

Two of the five reasons why the site is significant are

The Former Hoffman Brickworks, Brunswick is historically significant as a rare surviving industrial site which is illustrative of Melbourne's brickmaking industry. The site retains a brick press building, with associated machinery, an engine house and two Hoffman kilns and three chimneys. The kilns were the last of their type to operate in metropolitan Melbourne. [Criterion B]

The Former Hoffman Brickworks, Brunswick is scientifically significant for its adoption of the latest technology and the full industrialisation of the brickmaking industry in Victoria in the nineteenth century. This demonstration of a high degree of technical achievement included the first use of the Hoffman kiln in Victoria and the use of mechanised steam powered brick presses based on the Bradley-Craven method. [Criterion F]

These criteria directly involve Building 5 and 6. Regarding Criterion B I would note that Brick presses and the building they were originally located in rarely survive on brickworks mostly it is the kilns that survive. Based on my familiarity with brickworks I would see Building 5 and 6 as being very rare Nationally and Internationally, mostly it is the kilns that survive to be preserved or reused.

However it is not simply the case of the building surviving or the brick presses surviving what have survived on the Hoffman sites was the brick making process, from the clay coming from the preparation area into the loft of the building and being mixed and fed to be brick presses. It is this physical evidence of the process that is the key to understanding why the site is so important.

Regarding Criterion F again it was the preservation of the whole process from clay preparation to hot bricks coming out of the kilns that is a physical demonstration of the industrialisation of the brick making process which the Hoffman company pioneered in Victoria. Rather than this evidence being swept away by new technology the conservative nature of the Hoffman company in the early 20thC has ensured that the evidence remains. I would note that Bradley-Craven type brick presses were standard for Victorian brickworks in the period 1870 till c1950 and the ones at the Hoffman site are significant because they are "in situ" so the process of brick making can be seen and because of their scale due to the Hoffman Company being a large brickworks.

It is difficult to imagine how the removal of such a key part of the Hoffman Brickworks site, the brick production area, is not going to have a significant impact on the cultural heritage of the overall site. This is a point conceded (although downplayed and not elaborated) by the Heritage Impact Statement. The Hoffman Bricks works were essentially the kilns and the brick press building. One kiln has been allowed to be demolished and if the Brick press building is removed what will be left of the sites heritage values?

In my view nothing much; the significance of the site was always about the kilns and the brick presses as exhibiting the heritage values of the site through their fabric. Removal of the brick presses is to remove the key reason why the site is of such significance to Victoria.

To replace the original fabric from the 1870s, Victorians are offered a pathetic bland substitute for the real and authentic experience of the real building. It is not clear how the interpretation is in any way going to replace the original building; whether one or two presses are to be preserved and there is no attempt to interpret the complex conveyor system that took the clay from the grinding process to the presses.

Finally based on the track record of the applicant in implementing previous promises and conditions there has to be considerable doubt that the interpretation centre would ever be built.

I should also note that the mitigation strategy does not involve any form of archival recording of the buildings prior to demolition contrary to good heritage practice. Archival recording such a laser scanning to produce accurate archival records and 3d models for use in interpretation would seem appropriate in any legitimate mitigation strategy and

their omission suggests that the proposed mitigation for the demolition of state significant items is poorly thought out.

The HIS sees the allegedly poor condition of the building (I understand there may be alternative professional opinions on this matter) and some non-specific contamination issues as drivers for the demolition application. The allegedly poor condition of the building and the argument that it is not feasible to repair or reuse the building is perhaps not surprising given that I understand there has been limited or no maintenance of the building for over 20 years despite the recommendations of the CMP's and good practice for managing building assets.

Regarding the contamination issues having a Masters of Environmental Science and working for 10 years with an environmental company I would suggest that there are ways around the contamination problems that have not been explored rather than simply deciding that the building needs to be demolished. I would be surprised if the level of contamination has increased since the site ceased work over 25 years ago so it would hardly be an urgent requirement that work commence.

In considering my recollection of the history of heritage management of the Hoffman brickwork it is my recollection that once the initial subdivision of the larger site had occurred and the properties were sold Sun Grove was then going to undertake the adaptive reuse of the Brick Press building. Sadly this never happened but my understanding neither did any on-going protective maintenance of these building. If this is not the case it would have been helpful if the HIS explained this.

My understanding is that Heritage Victoria has made a considerable number of concessions have been provided to the owner/developer including the demolition of one kiln to allow the adaptive reuse of the site. In addition a number of the conservation studies were partly funded by public monies

My view is that there appears to have been no "bona fide" attempt to implement any of the recommendations of the Conservation Management documents and the permits issued by Heritage Victoria relating to Building 5 & 6. There are ample examples of complex industrial sites being successfully adapted for reuse in Australia and overseas and it is clear in issuing an amended permit in 2010 allowing for office and other uses Heritage Victoria was attempting to facilitate this adaptive reuse.

It is my view that this application has an impact so great on the heritage values of the Hoffman Brickworks that it ought to be rejected.

The mitigation of any possible impacts presented is poorly thought out, lacks the critical step of archival recording and in my view seems unlikely to be implemented given the applicants track record.

If you want to discuss this matter further, please do not hesitate to contact Dr Iain Stuart on 02-9701 0191 or by email ian@jcis.net.au

Yours faithfully,

JCIS Consultants

A handwritten signature in black ink, appearing to read 'Iain Stuart', with a long horizontal line extending to the left.

Dr Iain Stuart
Partner