

To: heritage.permits@delwp.vic.gov.au
Subject: Permit application P27923 for VHR0703 Former Hoffmans Brickworks
Date: Friday 12 January 2018

Steven Avery
Executive Director
Heritage Victoria

Dear Steven,

I am writing to object to the proposed demolition of buildings 5 and 6 on the Hoffman's Brickworks site in Brunswick. I am a resident of the Brickworks site, and support adaptive re-use and higher density housing, but not wilful destruction of our heritage.

The redevelopment of the site was predicated on the retention of the heritage core, which was to include turning the kilns into lightly partitioned spaces, allowing public access into and through this key heritage site, and retaining buildings 5 and 6. Kiln 1 was approved for demolition on the basis that building townhouses and apartments along Brickworks Drive would contribute to the restoration of the kilns.

In 2009 the owner submitted plans for buildings 5 and 6 to VCAT to support the conversion of the two remaining kilns into small apartments (plans updated for Heritage Victoria and VCAT 25.11.2009). These plans included retention in situ of six brick presses, an interpretation centre, and 20 commercial or office spaces, as well as 27 residences (including building 6a), across 3 levels (buildings 5 and 6) and 5 levels (building 6a). The three buildings were interconnected, facilitating access to the heritage artefacts and interpretation. The plans clearly showed the existing roof (TP32) and walls (TP08) to be retained and made good. For example, from TP08 "make good and weather proof existing perimeter walls, insulating and securing in accordance with agreed Heritage Victoria approach on walls and roofs".

That is, in 2009 we lost the opportunity for our community within the Brickworks, Brunswick, Victoria and nationally, to have ready access to the kilns. As part of the redevelopment the top level of the kilns was demolished (without retaining the existing roof and cladding as had been shown in the 25.11.2009 plans). The ground floor bricks have deteriorated significantly with the lack of ventilation from the sealed entrances, poured concrete floor and spraycrete lining, which makes me doubt the owner's commitment to conservation, and to long term outcomes.

Page 11 of the MGS Architects Report submitted by the owner to support the demolition application shows that the vast majority of the site will be used for a residential building 'subject to separate application', leaving a small 'heritage interpretation' site and 'commercial tenancy' site.

In the 2009 plans, it was not clear who would own or maintain the interpretation, but it could be reasonably expected to fall to the 47 commercial and residential shareholders a shared body corporate for buildings 5, 6 and 6a.

The plans submitted to support the application for demolition greatly increase the extent of residential development (from 27 to at least 51), reduce the commercial tenancies (from 20 to 3), and remove the residential development (and thus the bulk of this stage) from the building with the interpretation. It seems unlikely that the interpretation would be readily accessed under these plans. It may also be argued to be unviable if it was to be maintained by owners of two office/studio

spaces and one café, and the building costs not factored into the broader finances for buildings 5, 6 and 6a.

The history of this site is repeated calls for concessions, commitments, and then no action, before a further cycle of requests for concessions. Any deterioration of the buildings and equipment since the 1990s has been the fault of the owner, and should not be grounds for demolition.

The owner has also acted in bad faith when it comes to interpretation. The apartments in the kilns and on the former gatehouse site were supposed to include a covenant about the maintenance of the interpretation. This was not included in the contract of sale and the owner claimed that it would somehow be applied retrospectively, which we have not seen evidence of. The 2006 interpretation plan and 2010 interpretation plan overlay fulfilled Heritage Victoria requirements but has not been implemented. I have attached a couple of photos of the limited interpretation on site below.

Soil contamination has also been cited as a significant cause for concern. The whole Brickworks site was surveyed prior to initial developments, and the owners submitted the 2009 plans that we accept, and that met the requirements of Heritage Victoria and VCAT, with the same access to information about the soil condition. There are options for managing contamination with the buildings in situ, such as capping, and it should be incumbent on the owner to complete the Brickworks development within the plans and with the existing numerous concessions.

As a resident, I relished the connection with Brunswick's heritage, and am really upset that the owners have been able to use heritage and planning loopholes to renege on their responsibilities for this heritage site.

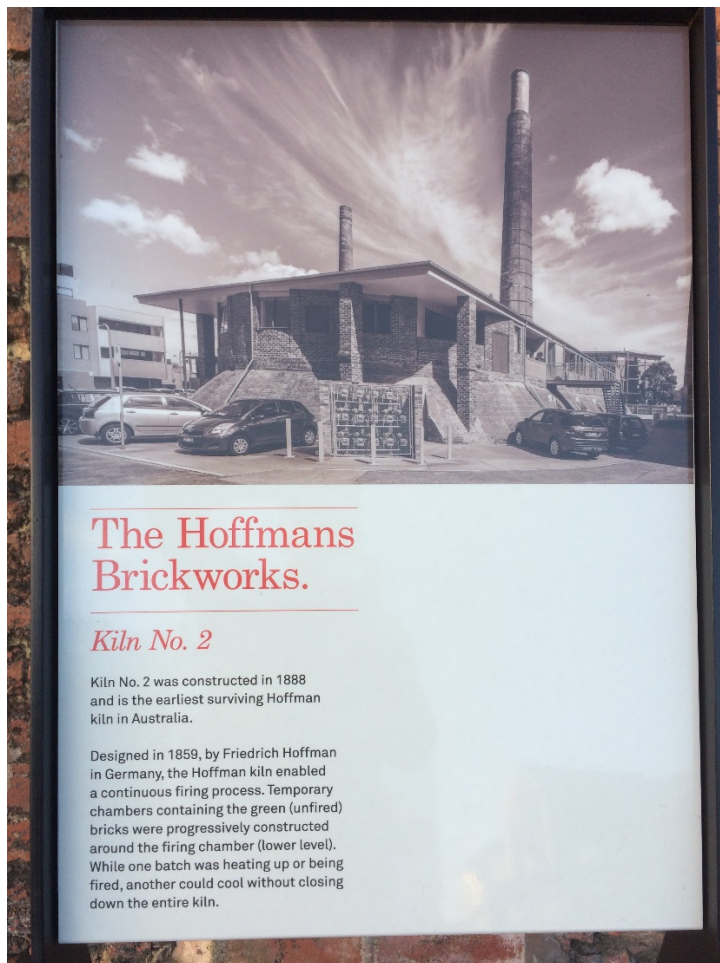
I implore you to reject the application for demolition on the basis that:

- Contamination can be managed, and is not substantially different to the situation when Heritage Victoria and VCAT, in good faith, accepted the owners plans of 2009.
- Any deterioration of the building over the last 20+ years has been the responsibility of the owner.
- Interpretation is not a reasonable substitute for conservation.
- The proposed plans:
 - o Greatly reduce the conservation of the building fabric and the equipment, and the scope of interpretation.
 - o Remove heritage considerations from most of the site and future owners, and leave a small area planned for a heritage and commercial building that is likely to be found to be unviable to build and to operate.

I would be pleased to expand on any of my concerns, and look forward to hearing from you.

Ruth

For reference, my contact details are listed below. Please do not include them on any public listing of this submission.



This is one of half a dozen signs installed in 2016. The photo is of the kiln it is against, in its contemporary form, after the top of the kiln was demolished and rebuilt and the Gatehouse building apartments completed. This does not help readers to understand how the site operated as brickworks, and is completely contrary to the 2006 and 2010 interpretation plan and overlay.



This is a view inside the western end of the top of kiln 2. According to the 2006 and 2010 interpretation plans submitted by the developer it was to have provided displays and the recreation of scenes that would enable people to understand how the kilns operated. It has no interpretive signs or illustrations and is only accessible to residents of kiln 2.