

9 November 2020

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

Dear Mr Avery

VHR0703 Former Hoffman Brickworks: Permit Application P31711

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 their 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. There is no evidence presented that Building 5 and 6 are of any lesser significance than when entered into the Victorian Heritage Register.
4. The application fails to demonstrate that structural remediation is not possible, and further fails to acknowledge that the poor condition of these buildings is in large part a result of continuing neglect – an ongoing failure to maintain and secure the buildings. While the 2020 application does not include an engineering report, the 2017 application for a similar development did include a report by a well-respected structural engineering firm that confirmed the possibility of structural repair.
5. The structural issues described in the application and in the Heritage Impact Statement 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).
6. 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.

7. The application fails to consider alternatives to complete demolition that would enable the applicant to fulfil the requirements of the recently expired permits 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 1999, 2002, 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 in the SAQP based on the assumption that Buildings 5 and 6 are to be removed. The issue of contamination is not new; conversion of an industrial site to residential and mixed community and commercial uses will always require consideration of contamination. Moreover, based on the SAQP review, contamination has been successfully dealt with across all other parts of the site. The potential for contamination to exist within Buildings 5 and 6 is presented as though it is 'new' information and therefore requires a different outcome than what has been repeatedly agreed for more than 20 years.
9. The application is accompanied by a Heritage Impact Statement which is inadequate in numerous ways, including in its assessment of the impact on the heritage values as a result of the proposed demolition as well as the impacts of the proposed new building. The total and permanent loss of Buildings 5 and 6 on each and every aspect of the cultural heritage significance of the place should have been addressed, as should 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



Ms Chris Johnston