

6 November 2020
Gary Vines
16 Raymond St Preston

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

Dear Mr Avery

Re: VHR0703 Former Hoffman Brickworks: Permit Application

Submission from Gary Vines, Industrial Archaeologist

By way of introduction, I am an historian, industrial archaeologist and heritage consultant with over 30 years' experience in Victorian and interstate heritage management. My knowledge of the Brunswick Brickworks goes back to the late 1980s when I was researching and recording industrial heritage in Melbourne's north and west with Melbourne's Living Museum. This included projects funded by the former Department of Planning and Environment as part of thematic heritage assessments, and comprised the first comprehensive assessments of the significance of industrial heritage in the state. Having worked in government, community and commercial heritage roles, I understand the issues involved in dealing with complex industrial sites and am familiar with both the constraints and opportunities within the commercial development applications.

I absolutely object to the plan to demolish the Brunswick Brickworks brick press building and engine house, (Buildings 5 and 6) to replace them with flats and a commercial building.

The Brunswick Brickworks is the most important remaining historic element of Melbourne's industrial heritage and the most prominent historical place related to the boom period and Marvellous Melbourne. I said when the developers got hold of this site and promised all sorts of conservation and preservation that I did not believe them, that they were trying to get as much developable area and profit out of it as they could and would just walk away when they had taken the profits and returned none of the benefits. Unfortunately with each new demolition application, and the continued neglect of basic maintenance of the historic structures, I am being proven correct.

This is just a more legal version of the Carlton Inn. Demolition by neglect. 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).

Heritage Victoria has made numerous concessions to the developers of this site on the promise that the heritage values will be conserved, and that income generated by development of some parts for apartments would fund the restoration and interpretation of the most significant parts. Well we are at the point where the most significant parts – the clay processing and brick pressing buildings, are the only ones left that have not been either demolished or severely compromised by unsympathetic alterations involving substantial

demolition of original fabric.

The concessions in the past were that they could demolish other buildings, rebuild the kilns for selling off, turn almost all the site into residential and commercial development, and in return, a small part would be repaired, conserved and interpreted to the public. Now even this will be sacrificed under this plan.

The main arguments the owners make for demolition is that contamination and the structural condition makes the buildings beyond repair. This is false. Firstly, nothing is beyond repair, and the Heritage Council and Heritage Victoria will be well aware of many examples where developers have argued this case, even brought out heritage consultants to support them, and then having lost, the buildings have been successfully conserved, restored and reused. I would draw your attention to Harricks Homestead in Keilor, and 864 Swanston St Carlton as two such examples both of which had experts argue that they were so dilapidated that they could not possibly be restored or reused. I know they are of a different scale, but if heritage experts are unable to recognise that such buildings cannot be successfully repaired, then their judgement on larger buildings cannot be accepted. I suggest you also look at the Richmond Power Station, which was also claimed back in the 1980s to be structurally unsound and grossly contaminated to the point that it could not be retained for any modern use. And yet it was eventually adapted and restored to a fabulous state preserving much of its heritage character. As a former coal fired power station, this site had potentially far worse contamination issues that the brickworks could possibly have, but still these issues were successfully addressed and a profitable development was achieved.

I would like to make the further point that despite the Heritage Impact Statement claiming the building is too dilapidated and contaminated to retain, there is in fact, no actual evidence to back this up. Nowhere in any of the contamination and engineering reports do they state that the building cannot be repaired and made safe, only that this work needs to be carried out. Contamination issues have been known for over twenty years without any action being taken and with the surrounding area being developed, presumably under the necessary EPA approvals. The Compass Environmental report only indicates what is not known regarding the extent of contamination. It does not consider options for mitigating contamination, or treatment that would allow retention of the existing buildings. This has not even been considered, and so the argument that contamination requires demolition of the buildings should be dismissed entirely.

The application fails to demonstrate that structural remediation is not possible. In fact, the application includes a report by a well-respected structural engineering firm that confirms the possibility of structural repair. Yes the building needs repair and remediation, and some additional investigation following stabilisation with support scaffolding. The owners should have obtained advice and costings about how these works should be done, rather than try and use incomplete assessments to argue for demolition. Also, if they go on to claim that the cost of repair and remediation is too great, they should be required to provide evidence in the form of independent quotes for the work that is required in order to retain the buildings and the financials for the entire development (i.e. how much has been earned in sales, cost of development, profit, etc.) for all the previous development that has occurred. Their initial argument for being allowed to develop the site beyond what the planning scheme and State and municipal planning policies allowed, was

that the profit from the development (including development on the sites of other historic buildings in the complex, including the demolished kiln, gate house and others) would fund not just retention of the remaining structures, but their restoration, interpretation, a museum and community access. None of this has happened apart from repair to structures used for conversion to private residences, and a few bits of machinery placed around the site with no contextualisation.

The applicant has failed to secure the site from illegal access, with an inadequate temporary fence that was readily breached. They have also failed to secure and protect an extensive collection of portable objects that are contributory to the significance of the site.

If they had taken their responsibilities under the Heritage Act seriously, they would have addressed structural and safety issues long ago, rather than leave the site open to vandals and the elements to ensure further deterioration would occur. If the owners had spent any money on maintenance and repair on the site in the last 20 years, they could have prevented deterioration and progressively dealt with structural problems.

In fact, their own previous documents (the 1998 structural engineering report by The O'Neill Group) that have been withheld from this application, demonstrates a decline in the condition of the buildings during the applicant's period of ownership and management. The application fails to disclose this report. This suggests there is evidence to support a case for prosecuting the owners for failing to properly maintain the buildings and allowing them to deteriorate.

This is a clear case of demolition by neglect. If Heritage Victoria and the Heritage Council approve the demolition, then they are sending a signal that such heritage sites do not require preservation, that negligent land owners can get away with allowing their buildings to fall down, and that instead of being prosecuted and forced to rectify the damage they have allowed to happen, they will be rewarded with a windfall of approval of more intensive development and fewer heritage conditions.

It is clear from the heritage assessments and analyses of the Brunswick Brickworks that demolition of Buildings 5 and 6 would result in the total and permanent loss of the cultural heritage significance not only of these buildings, but also of the greater site. The demolition of Buildings 5 and 6 would have a severe, irreversible impact on the cultural significance of the Hoffman Brickworks site as a whole, and therefore a significant impact on the cultural heritage of the State of Victoria. The compromised and much altered kilns cannot on their own represent the significant contribution of this site to Victoria's history and development. There is no evidence presented that Building 5 and 6 are of any lesser significance than when entered into the Victorian Heritage Register.

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).

The proposal to reinstall some of the brick presses, in an area otherwise intended as a commercial lease,

divorced from their contexts, with no evidence of the integrated clay processing, conveyors, drive shafts and control facilities, or the distinctive structural form or original materials of the buildings, and none of the patina that conveys the working and social history of the site will leave it sterile and meaningless. Any interpretation will necessarily be subservient to the commercial requirements of the space and ultimately will be discarded in the next café refit or renovation.

The argument that a small interpretive display is sufficient to mitigate the loss of buildings of primary significance, which are crucial to the understanding of the brickmaking process, the machinery, the people who worked there and the historical connection to the rest of Melbourne's building boom history, is entirely false and disingenuous, particularly in that it comes from a former representative of ICOMOS, which states in its Charter for the Interpretation and Presentation of Cultural Heritage Sites and Interpretation Practice Note (November 2013) that: 'It is not acceptable to use interpretation as an alternative to the physical conservation of a place'. Instead 'Interpretation is part of a holistic package of best practice conservation management measures'.

If this development application is approved it will be the final evidence of the complete failure of heritage regulations on the site. The developers have been given concessions all the way, with an outcome that is sub-optimal in terms of planning, community and residential amenity outcomes. For example there have been numerous residents' complaints about lack of parking, inadequate security, access for rubbish trucks and emergency services, trespassers, vandalism, dangers from possible collapsing buildings (recently proven by the collapse of the engine house roof), graffiti, rubbish and rats.

The developers have failed to complete repairs ordered by Moreland Council and Heritage Victoria, and as a result the buildings have been at the mercy of vandals and weather. They now argue that they are beyond repair.

Finally, if the developer's need for profit is put ahead of the community's need to preserve its heritage on this site, it will be a depressing precedent for all other remaining industrial (and other difficult) heritage in the state, including the only other remaining Victorian brickworks at Box Hill. It will also be rewarding a developer for failing to meet their original planning approvals, consistently breaking past promises, and failing to undertake even the most basic maintenance and repair unless under extreme duress from Heritage Victoria.

The permit should not be granted. It will only put more profit into the private company's hand, give nothing back to the community and do nothing to preserve our heritage.

Brunswick Brickworks is one of the most significant industrial heritage sites in Victoria, and if this cannot be saved, nothing can.

Regards

Gary

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