

Use this form to lodge a submission to Heritage Victoria in response to the public notice of a heritage permit under Section 95 of the *Heritage Act 2017*.

Prior to making a submission please read Heritage Victoria's Policy Guideline for Public Notice of Heritage Permit Applications and Submissions Received.

In considering a permit application the Executive Director, Heritage Victoria, considers matters set out under Section 101 of the *Heritage Act 2017* (the Act), which includes all submissions received during the public notice period. Submissions received should relate to the cultural heritage significance of the place or object. Planning matters including amenity, overshadowing of non-heritage properties, noise, traffic and car parking are not matters considered in determining a permit under the Act.

Submit the completed form to Heritage Victoria before midnight on the last date of the public notice period via email at heritage.permits@delwp.vic.gov.au.

Please note:

Submissions received will be treated as a public document and may be provided to persons with an interest in the heritage place or object, including the applicant. This will include your name and contact details.

The advertised permit will not be determined during the notice period.

All submitters will be notified when the permit application is determined and if any future permit amendment applications are received. Please note that where petitions are received only the submitter will be contacted.

1. Application Details

Place or object name:	Former Hoffman Brickworks
Address or GPS location:	72-106 Dawson Street, Brunswick
Victorian Heritage Register number:	H0703
Permit Application Number:	Permit application P31711

2. Personal Details

First name:	Megan
Surname:	McDougall
Business or organisation name:	
Position title:	Heritage consultant

Address (optional):

Email address:

Telephone:

3. Submission Details

Please outline your views about the permit application:

I strongly object to the issuing of a permit and urge the Executive Director, Heritage Victoria to refuse the application on the following grounds:

1. Irreversible adverse effect on heritage significance

The demolition of the brick pressing shed (Building 5) and steam engine house (Building 6) will result in a negative, irreversible effect on the cultural heritage significance of the place. These buildings are critical to the brickworks site because the brick pressing- forming the bricks- is at the very heart of the brickworks process.

From the Statement of Significance:

What is significant?

A portion of the original No 2 works of the Former Hoffman Brickworks, Dawson Street, Brunswick, including two Hoffman kilns, a remnant chimney from a third Hoffman kiln, **a large brick press building containing nine brick presses, an edge runner mill, an engine house** and an area of the former pottery works which may contain sub-surface remains of two kilns.

Why is it significant?

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]

The demolition of 2 critically important buildings will result in a very substantial loss of significance of the whole site.

2. Adverse and irreversible effect on setting

The size of the proposed development -7 storeys- will completely visually overwhelm and dominate the adjacent significant kiln buildings and chimneys, and have an extremely adverse impact on their setting. This is contrary to Heritage Victoria's Guiding Principle. 3 -Protect Significant settings and views, and

Article 8 of the Burra Charter.

Article 8. Setting Conservation requires the retention of an appropriate setting. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place. New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate.

The Burra Charter is listed under the Permit Policies and Decision Making Guidelines on the Heritage Victoria website.

The proposed new building, with its conscious evocation of the brick press and former steam engine house buildings, loses any sense of recreation of the original buildings B5 and B6 due to the number of new openings and when topped with a multistorey high density residential development.

Instead of being “read” as a key industrial building on the site, the 7 storey apartment building will look like a large modern apartment building.

The nature of construction of apartments with expected subsequent subdivision for strata titling for individual apartment ownership makes future reversal virtually impossible.

3. Erosion of significance or “death by a thousand cuts”

Approvals granted by Heritage Victoria over time have been resulting in an increasing loss of original fabric. The loss of Kiln 1 was considered a major loss necessary to enable the initial residential development to be economically viable. The subsequent works to convert the kilns to apartments, and especially the kiln fronting Dawson Street have been unfortunate, especially when works to buildings 5 and 6, necessary to retain and protect them, were not undertaken. I believe the loss of buildings 5 and 6 will seriously jeopardise the cultural heritage significance of the site.

4. Loss of authenticity

The removal of the brick pressing machines and associated hoppers, chutes, conveyors etc, and the relocation of removed elements in a totally new structure will result in a major loss of authenticity and significance. Authenticity is a key principle of good interpretation practice. (Refer Australia ICOMOS Practice Note on Interpretation, Nov 2013)

5. Condition of Buildings 5 and 6

The current condition of Buildings 5 and 6 appears to be the result of lack of adequate maintenance, and a failure to secure the buildings over a long period. I understood that these buildings were always going to be repaired and used. The condition of these buildings should not be used to justify their demolition.

6. Contamination

While I acknowledge contamination may be an issue, the Sampling Analytical and Quality Plan (SAQP) which forms part of the advertised permit application documents, assumes demolition of the brick pressing shed (B5) and steam engine house (B6), and excavation for a two level basement carpark. Other options for remediation of the site, which retain these important heritage buildings, does not appear to have been considered. Other contaminated heritage sites, such as the Bendigo Gasworks,

which has the added problem of being sited next to a main water course, have had remediation planned to retain all the heritage buildings on the site.

7. Economic arguments

The economic arguments should not be considered solely for the current reduced site, or even the extent of registered land, but in the context of the whole historic residential development (and any profits) over the past 20 years. An increase in costs of repair of the current buildings B5 and B6 is likely to have resulted from a lack of investment in maintenance over a long period of time.

8. Disagreement with Supplementary Heritage Impact Statement

I strongly disagree with the conclusions of the Supplementary Heritage Impact Statement (HIS) which forms part of the permit application. The proposal is not accurately described as “demolition and rebuilding of the Brick Pressing Shed and Engine House”. The proposal is a totally new building with 2 level basement carpark and limited visual references to B5 and B6. A simple comparison of existing and proposed western elevations is telling.

Thank you for making a submission to Heritage Victoria. Please note that submissions received outside the advertised period will not be considered as a formal submission but may be considered under section 101(3) (b) of the Act - ‘any other relevant matter.’

To obtain a copy of your own lodged submission please contact Heritage Victoria on (03) 7022 6373 or at heritage.permits@delwp.vic.gov.au.