



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

Submission to the Priority Projects Standing Advisory Committee

Referral 15 Call in of VCAT P488/2021 (Aikenhead Centre for Medical Discovery) (Basis of Presentation 13 August 2021)

We are grateful to the committee for deciding to hold this hearing and we appreciate the opportunity to submit our views on this application.

Introduction

Our case is based on the following facts pertaining to the proposed building as amended and I begin with these:

- The proposed building is located within the World Heritage Environs Area. It abuts the South Fitzroy Heritage Precinct (HO 334). It is opposite the Royal Exhibition Buildings and Carlton Gardens World Heritage site.
- The proposed building represents a significant accretion of height over the existing Aikenhead Wing; at 53.96 metres. Based on Relative Levels (Plan 101), it would be nearly 15 metres higher than the existing Aikenhead. It is thus higher than the existing Aikenhead Wing by the equivalent of five normal storeys.
- The proposed building is of much greater mass than the existing Aikenhead Wing and, in the words of the Design Review Panel, 'while the mass [of the current Aikenhead building] is broken down by considered articulation of the façade and ground floor definition. This articulation is currently lacking from the proposal.' The Panel concludes, 'Another layer of articulation of façade, mass and form is needed.'¹
- The proposed building, in its exterior materiality, is of reflective appearance. While the amended plans reduce reflectivity, the proposed Low Iron Clear Vision Glazing | Maximum 15% Reflectivity is nevertheless a form of reflective glazing, of significantly greater reflectivity than the brick of the existing Aikenhead Wing.

¹ Victorian Design Review Panel, [Report] *St Vincent's Hospital Aikenhead Centre for Medical Discovery (ACMD)*, 27 and 31 Victoria Parade, Fitzroy (April 2021), p. 5.

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Email: office@historyvictoria.org.au; reply to: c.sowerwine@gmail.com.

- ‘The proposed architectural response is intended’, as the applicants stated originally, ‘to be contemporary and **visually striking** [*emphasis added*]’; ‘the proposed finishes incorporate substantial amounts of framed glazing’ which ‘is atypical for the South Fitzroy Precinct’.²

Based on these facts, we submit that this is architecture designed to make a statement, ‘look at me’ architecture, notwithstanding the changes presented in the amended plans. We submit that this building, for these reasons, is much more harmful to the Outstanding Universal Values of the WH site than the existing Aikenhead Wing. All these factors make this project inappropriate in this World Heritage context. We submit that the Committee should advise the Minister to refuse a permit.

This submission presents the RHSV as a stakeholder and then elaborates on the ways that this proposed building would be at odds with:

- the history of what is now the WH site
- the protection of the Outstanding Universal Values of the WH site as agreed with UNESCO upon nomination
- the relevant planning controls and studies, viz.
 - 1) Yarra, especially HO334
 - 2) The World Heritage Environs Area Precinct
 - 3) The Review of the WH Strategy Plan for the REB & CG WHEA
- the Urban Context

Finally, this submission expands on:

- the dominating visual impact of the proposed building
- the disrespectful treatment of the adjoining Brennan Hall, an important and largely intact heritage building

An appendix elaborates on the promises the Australian government made to UNESCO at the time of nomination.

The Royal Historical Society of Victoria (RHSV)

The Royal Historical Society of Victoria functions both as the peak body for the 340 local historical societies of Victoria and as the historical society for central Melbourne. In the first capacity, the RHSV seeks to support the conservation of heritage across the state, including its capital city Melbourne. In the second, the Society seeks to preserve the heritage of the city and its inner area.

The RHSV has been a partner and a key stakeholder with the City of Melbourne since the Society’s inception in 1909. Thus the RHSV is doubly a stakeholder in any discussions concerning the protection of what is now a World Heritage site and arguably the most significant heritage precinct in Melbourne.

The Heritage Committee of the RHSV was formed in 2016 to provide consistent guidance to the RHSV Council on heritage matters, especially when our advice as stakeholders is sought and when one or more of our affiliated local historical societies seeks advice or support in heritage matters. It consists of three members of the RHSV Council, supported by two town planners, two heritage professional and two historians. I am Emeritus Professor of History at the University of Melbourne and have had a long involvement in heritage issues since my

² Contour, *Town Planning and Urban Context Report*, p. 40.

involvement as a volunteer in the study that led to the declaration of the South Fitzroy Precinct in 1978. I have chaired the RHSV Heritage Committee since its inception.

The Royal Exhibition Building & Carlton Gardens World Heritage Site

The Royal Exhibition Building and Carlton Gardens (REB & CG) together constitute the first Australian cultural site to be inscribed on the World Heritage List (2004) and one of only four Australian cultural sites currently so honoured. The others are the Sydney Opera House (2007), the Australian Convict Sites (2010) and the Budj Bim Cultural Landscape (2019). The REB & CG date from the later 19th century and bear witness to the period when Australia came of age and became a nation. That makes the site of the utmost value to Victoria, a state shaped so powerfully in the half-century following the Gold Rush, and particularly to Melbourne, still one of the world's greatest and most intact Victorian cities, as Lord Asa Briggs wrote in his classic *Victorian Cities*.³

The Exhibition Building—it was not 'Royal' until 1980—was still young at the time of the RHSV's founding in 1909, but already, more than any other site, it embodied the city of Melbourne in the minds of its inhabitants and represented the young city to the world. It put Melbourne on the international map with the 1880 and 1888 Exhibitions and became the symbol of 'marvellous Melbourne'.

With the opening of Federal Parliament in 1901 and the inauguration of Melbourne as the first national capital, the Royal Exhibition Building became the incarnation of the new nation. Its national status was immortalised in Tom Roberts' iconic 'Big Picture', officially titled *The Opening of the First Parliament of the Commonwealth of Australia by His Royal Highness the Duke of Cornwall and York, 9 May 1901* and 'one of the most famous paintings on public display in Parliament House' in the words of the Parliament of Australia web site. That painting was widely disseminated through countless engravings, which have made it part of the Australian imaginary for over a century now.

The Exhibition Building's international status derives from two unique factors: on the one hand, it was created for two of the great international exhibitions (1880 and 1888), which were so significant in the shaping of 19th-century world culture, and it is still intact; on the other hand, not only are its original surrounds, the Carlton Gardens, intact, but also its original urban context is unusually well preserved. The built fabric surrounding the Carlton Gardens on three sides, in Carlton and Fitzroy, is still remarkably intact, and while that on the City of Melbourne side has suffered losses, the immediate areas abutting the Carlton Gardens are still intact. That is why the world heritage nomination specifies 'the Royal Exhibition Building **and the surrounding Carlton Gardens** [*emphasis added*] as the main extant survivors of a Palace of Industry **and its setting** [*emphasis added*]'.⁴

The surrounds now designated as the World Heritage Environs Area (hereinafter WHEA) are still consistent with building envelopes and types of built form predominating at the time of the 1880 and 1888 Exhibitions. A Victorian tourist transported to the present would feel at home with the view from the dome unless s/he looked toward the City. As the Australian Government Response to the ICOMOS Assessment Report put it to UNESCO when seeking World Heritage

³ Asa Briggs, *Victorian Cities* (Harmondsworth: Penguin Books, 1990 [orig. edn 1963], pp. 277ff.

⁴ 'Decision of the World Heritage Committee', 7th July 2004, File Name: 1131, <https://whc.unesco.org/uploads/nominations/1131bis.pdf>.

status: ‘The Royal Exhibition Building in its original garden setting is the most authentic remaining example of an *in situ* Palace of Industry from a significant international exhibition’.⁵

The significance of this site, taken as a whole—the Royal Exhibition Building, the Carlton Gardens, and their surrounds—cannot be overstated. ‘The expository ensemble comprising the Melbourne Exhibition Building and the Carlton Gardens is a unique, magnificent and outstanding survivor from this great age of great exhibitions. There is nothing like it anywhere else in the world today’, wrote the eminent UK historian, Professor David Cannadine.⁶ All this was recognised in its nomination as a World Heritage site.

We urge the committee to give the utmost weight to this heritage context and to the need to preserve its Outstanding Universal Values, including its surrounds, as agreed with UNESCO.

Relevant Planning Issues (1): the South Fitzroy Precinct (HO334)

The site under discussion is within the South Fitzroy Precinct (HO334) and is thus subject to the City of Yarra Heritage Overlay. The HO334 statement of significance notes the interlocking importance of the WHEA and the South Fitzroy Precinct:

*The nineteenth century development and character of the South Fitzroy Precinct contributes to the broader setting and context of the Royal Exhibition Building.*⁷

The applicant’s Heritage Impact Statement acknowledges that *the relevant heritage provisions ... in the Yarra Planning Scheme... include:*

- *Clause 43.01 ‘Heritage Overlay’*
- *Clause 22.02 ‘Development Guidelines for Sites Subject to the Heritage Overlay’*.⁸

Yarra Planning Scheme 43.01-8 specifies *inter alia*:

Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority must consider, as appropriate:

...

The significance of the heritage place and whether the proposal will adversely affect the natural or cultural significance of the place.

...

*Whether the location, bulk, form and appearance of the proposed building is in keeping with the character and appearance of adjacent buildings and the heritage place.*⁹

More particularly, Yarra Planning Scheme 22.02 applies here, as the applicant acknowledges, and we note particularly the following:

*Encourage the design of **new development** [emphasis added] and alterations and additions to a heritage place or a contributory element to a heritage place to:*

⁵ ‘Australian Government Response to the ICOMOS Assessment Report on the Royal Exhibition Building & Carlton Gardens World Heritage Nomination’, 9 June 2004, <https://whc.unesco.org/uploads/nominations/1131bis.pdf>, p. 2.

⁶ *Ibid.*, p. 2 and Appendix 1: Statements by International Experts.

⁷ City of Yarra Review of Heritage Overlay Areas 2007 Updated March 2013, p. 156.

⁸ HIS, p. 22.

⁹ 43.01-8 Decision guidelines 24/01/2020 VC160.

- *Respect the pattern, rhythm, orientation to the street, spatial characteristics, fenestration, roof form, materials and heritage character of the surrounding historic streetscape.*
- *Be articulated and massed to correspond with the prevailing building form of the heritage place or contributory elements to the heritage place.*
- *Be visually recessive and not dominate the heritage place.*
- ...
- *Consider the architectural integrity and context of the heritage place or contributory element.*¹⁰

We submit that the proposed building flies in the face of these provisions. It does not respect the patterns or rhythms of the Victorian streetscape, which is particularly relevant to the remarkably intact streetscape on Nicholson Street north of St Vincent's, a streetscape so significant to the Exhibition Buildings. It is not articulated and massed to correspond to the prevailing building form. And it is certainly not visually recessive. The exterior materials now specified may be less reflective than the original proposal, but the building is still aiming to demand attention as a landmark. All these points have been raised by the Design Review Panel and indeed by the applicant themselves. The point here is that these issues are contrary to the relevant planning controls.

Relevant Planning Issues (2): the World Heritage Environs Area

The significance of the setting, that is the largely intact Victorian precincts surrounding the Carlton Gardens, is, as Professor Cannadine emphasised, a major component of its overall significance. Indeed, the Australian government promised UNESCO that it would ensure that 'all planning policies in these [i.e. the surrounding] areas discourage the demolition of Victorian-era buildings and require any development to enhance heritage values' and maintain the precinct's Victorian-era low-rise scale.¹¹

In the subsequent implementation of these policies (in 2009), the promised buffer zone was divided into an 'Area of Greater Significance' and the rest of the WHEA. The St Vincent's site was omitted from the 'Area of Greater Significance'. It is the only frontage on the Carlton Gardens omitted. But it still forms part of the WHEA. And even the applicant's own Heritage Impact Statement accepts that, 'as the site is in close proximity to the world heritage place and abuts HO361 to the south and west',

*It is considered appropriate to provide a response to this issue, particularly in the context of the review of the World Heritage Management Plan (WHMP) currently underway. It is understood that a strengthening of the planning controls will form part of the review of the WHMP and it is expected that the draft of the reviewed WHMP document will be available for public comment in late 2021.*¹²

We point out that the use of the term 'WHEA Precinct' to designate HO361 as opposed to the WHEA is an unfortunate consequence of the decision to split the WHEA into two areas. That decision is subject to reversal as a result of the Review, which is now nearing finalisation.

¹⁰ HIS, p. 22.

¹¹ 'Australian Government Response', pp. 12, 13.

¹² Heritage Impact Statement (HIS), p. 31.

Relevant Planning Issues (3): *Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area*

As the committee will know, the Draft *Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area* has recently been finalised and circulated for public comment.¹³ Submissions to the Heritage Council have, as the Chair mentioned Wednesday, extended to 24 September. Following consideration by the Heritage Council it will go to the Minister. Implementation of the Review recommendations is likely to occur well before any new building is completed on the Aikenhead site.

The terms of reference of the committee as per the Minister's letter to the Chair dated 6 June 2021 take account of this reality by asking that the committee give consideration to the Review (*inter alia*). It is therefore open to the committee to advise the Minister to take account of the Review proposals, which will be presented for his signature in the near future, where they impact on the decision he will make in this matter. We submit that the committee should advise refusal of a permit, given that the proposal is at odds with the strengthened planning controls for the WHEA that the Minister will soon be asked to sign.

The Review noted that there were inconsistencies and ambiguities in the various planning schemes applicable to the WHEA Precinct. An excellent Discussion Paper (prepared by Hansen Partnership Pty Ltd in partnership with HLCD Pty Ltd for the Department of Environment, Land, Water & Planning) laid the basis for significant improvement in the consistency of protections. Any ambiguities in protection must be resolved in the context of the significance of the world heritage site and of the promises made to UNESCO.

The thrust of the Review is to harmonise and strengthen these controls, to extend the WHEA, to eliminate the distinction within the WHEA between the Area of Greater Significance and the rest of the WHEA, and to cover all the WHEA with the controls now applying to the Area of Greater Significance, in particular Yarra Planning Scheme 22.14, which specifies that 'it is policy to ... retain the predominantly lower scale form of development which provides a contrast to the dominant scale and form of the Royal Exhibition Building'.

We submit that three proposals put forward in the Review are particularly relevant to the case under consideration here:

- Remove the distinction between areas of Greater and Lesser sensitivity of the WHEA.¹⁴
- Nominate the Executive Director, Heritage Victoria, as a determining Referral Authority [within the WHEA] for certain scales of development (applications for height of 3 storeys/11m or greater).¹⁵
- Even more specifically, the Review has provided draft DDOs in order to retain the appropriate context for the Outstanding Universal Values of the World Heritage site.¹⁶ The draft *Schedule [Number] To Clause 43.02 Design And Development Overlay* drafted in conjunction with the WHEA Review specifies that the revised DDO should:

1) Ensure development of the St Vincent's Hospital site replicates the general maximum height of existing hospital buildings;

¹³ Draft *Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area*, Prepared by Hansen Partnership Pty Ltd in Partnership with HLCD Pty Ltd for the Department of Environment, Land, Water & Planning [Victoria], May 2021 (Version D, 11/06/21).

¹⁴ Ibid., p. 4.

¹⁵ Ibid., pp. 4, 98.

¹⁶ Draft *Review of the World Heritage Strategy Plan*, p. 24.

2) Ensure development includes materiality which is influenced by its heritage setting and is of muted materials and colours, and which avoids the use of larger areas of reflective materials.¹⁷

Under the regime proposed by the Review, the site under discussion would fall within the WHEA's strongest protections. The Executive Director's standing as a determining Referral Authority would have a deterrent effect on proposals for excessive development. And the proposed DDOs would impose significant constraints on all applications within the WHEA pertaining to buildings of 11m or greater height. This adds to the case for the committee to advise the Minister to reject this application.

The Proposed Development: Visual Impact

The proposed building is not in keeping with the character and appearance of the adjacent World Heritage site or of the South Fitzroy Precinct, by virtue of its location, bulk, form and appearance. It is much more harmful to the Outstanding Universal Values of the WH site than the existing Aikenhead Wing. As the Design Review Panel notes, the mass of the existing Aikenhead Wing 'is broken down by considered articulation of the façade and ground floor definition' and the brick facing of the existing Aikenhead Wing is visually recessive and certainly not reflective. The proposed design, even in its modified form, remains largely unarticulated in its mass and much more visually striking.

We note that the material schedule for the exterior finishes now lists various forms of Low Iron Vision Glazing, some 'Clear', some of 'Grey/Silver Appearance' and rated Maximum 15% Reflectivity throughout. How 'muted' this would prove in practice. Given that this change has been so precipitate, we are unable to make an estimation of the degree to which this reduces the building's reflectivity in practice. We believe that such an important matter deserves more consideration and we therefore applaud the panel's request for further information from the applicant. Notwithstanding, this glazing is nevertheless essentially reflective in character, however 'muted' it may prove to be. The existing Aikenhead Wing with its tired brick exterior is relatively recessive visually and this building, even with its new less reflective exterior finish would still be, as it has been intended to be, visually striking.

As the Design Review Panel suggested, a building replacing the Aikenhead Wing should be articulated to break down its mass and help it correspond with the prevailing building form of the heritage place. The proposal is for a tall box massed to respond to the office and apartment towers on the south side, that is the city side, of Victoria Parade. What is required on this site is a building that responds to the typical articulation of built form in the South Fitzroy Precinct, terrace housing.

All the planning controls mentioned above have in common a requirement that the design respond to and respect the character, appearance and heritage character of the surrounding historic streetscape. The core of the issue is, to quote Clause 22.02 of the Yarra Planning Scheme, that the new building 'be articulated and massed to correspond with the prevailing building form of the heritage place or contributory elements to the heritage place'.

The proposed building represents a significant accretion of mass and bulk over the building it would replace. At 53.96 metres, it is nearly 15 metres higher than the existing Aikenhead Wing. The proposed building is thus higher than the existing one by the equivalent of five normal storeys. In Figure 1, below, a black line has been drawn to indicate the portion of the proposed building which exceeds the height of the existing Aikenhead Wing.

¹⁷ Draft Schedule [Number] to Clause 43.02 Design And Development Overlay proposed in conjunction with the WHEA Review, Draft Strategy Plan (available at 'proposed City of Yarra planning scheme controls', <https://engage.vic.gov.au/rebcgreview>).



Figure 1: View of proposed ACMD building (original exterior finishes) looking east along Victoria Street/Parade (Render from HIS, p. 21; line calculations by committee member Mr Ian Wight, MICOMOS).

The proposed building is, moreover, anything but ‘visually recessive’ and, also contrary to Clause 22.02, it dominates the heritage area. Indeed, the applicants not only admit but make a virtue of the design’s aim to seek attention: ‘the proposed architectural response is intended to be contemporary and **visually striking** [*emphasis added*]’.¹⁸ The Heritage Impact Statement admits that, ‘the proposed finishes incorporate substantial amounts of framed glazing’ and that, ‘this is atypical for the South Fitzroy Precinct, and the St Vincent’s Hospital complex itself’. The proposal under consideration is attention-seeking architecture where what is required is respectful architecture.¹⁹ The redevelopment of the Aikenhead Wing represents an opportunity to improve the response to this significant heritage area. This opportunity is too important to be missed.

¹⁸ Town Planning Report, p. 40.

¹⁹ HIS, p. 27.

The Urban Context

The applicant has sought to minimise the significance of the WHEA by relying on the distinction between the Area of Greater Sensitivity and the remainder. This is a confusion augmented by the designation in HO361 of that Area as the WHEA Precinct.’ In the light of the Review recommendations, that distinction is of decreasing relevance.

As we have noted, the applicant justifies the proposal as ‘largely consistent with other modern buildings in the immediate vicinity, particularly on the south side of Victoria Parade’.²⁰ Like the Design Review Panel, we believe that ‘Victoria Parade acts as a line of demarcation and we are concerned this proposal suggests a significant departure from the site’s heritage, possibly establishing an undesirable precedent for future proposals. We are not convinced by the commercial expression that references nearby buildings to the south, such as Orica (ICI) House.’²¹

In evidence to the committee, Mr Mark O’Dwyer has similarly emphasised the urban context provided by Victoria Parade south and west of the St Vincent’s campus. He lists other buildings to the east and south (Image 10). These buildings all exist to be sure. It is, however, hard to justify using them as precedents for the current proposal. Many of them are planning mistakes, not to say nightmares. Most of them are mostly east or southeast of the site, on the other side of Victoria Parade and outside the WHEA (except those which, like the Atherton Public Housing, one of Mr O’Dwyer’s justifications, were built before the WHEA was declared). The ACU Building is one of the few on the north side of Victoria Parade, but it is well to the east of the St Vincent’s site and well outside the WHEA. None of these buildings front the world heritage site, as does the Aikenhead Wing. Few are examples one could seriously propose to recommend for emulation.

Victoria Parade is indeed a ‘line of demarcation’ and the aim of all the relevant planning instruments (see above) is to protect the WHEA and the South Fitzroy Precinct from the intrusion of the built form characteristic of the city side of that line of demarcation. To use this as the context in formulating a design response is to confuse the location of the site.

Whatever built form may be located south and east of the WHEA, the Aikenhead site, located at the corner of Victoria Parade and Nicholson Street, is entirely within the WHEA, which indeed extends to the east as far as Fitzroy Street and to the south as far as Albert Street. We submit that this is the most important context for the committee to consider in its deliberations.

Figure 2, below, makes clear the the Aikenhead site’s location within the WHEA.

²⁰ HIS, p. 27.

²¹ Victorian Design Review Panel, [Report], p. 4.

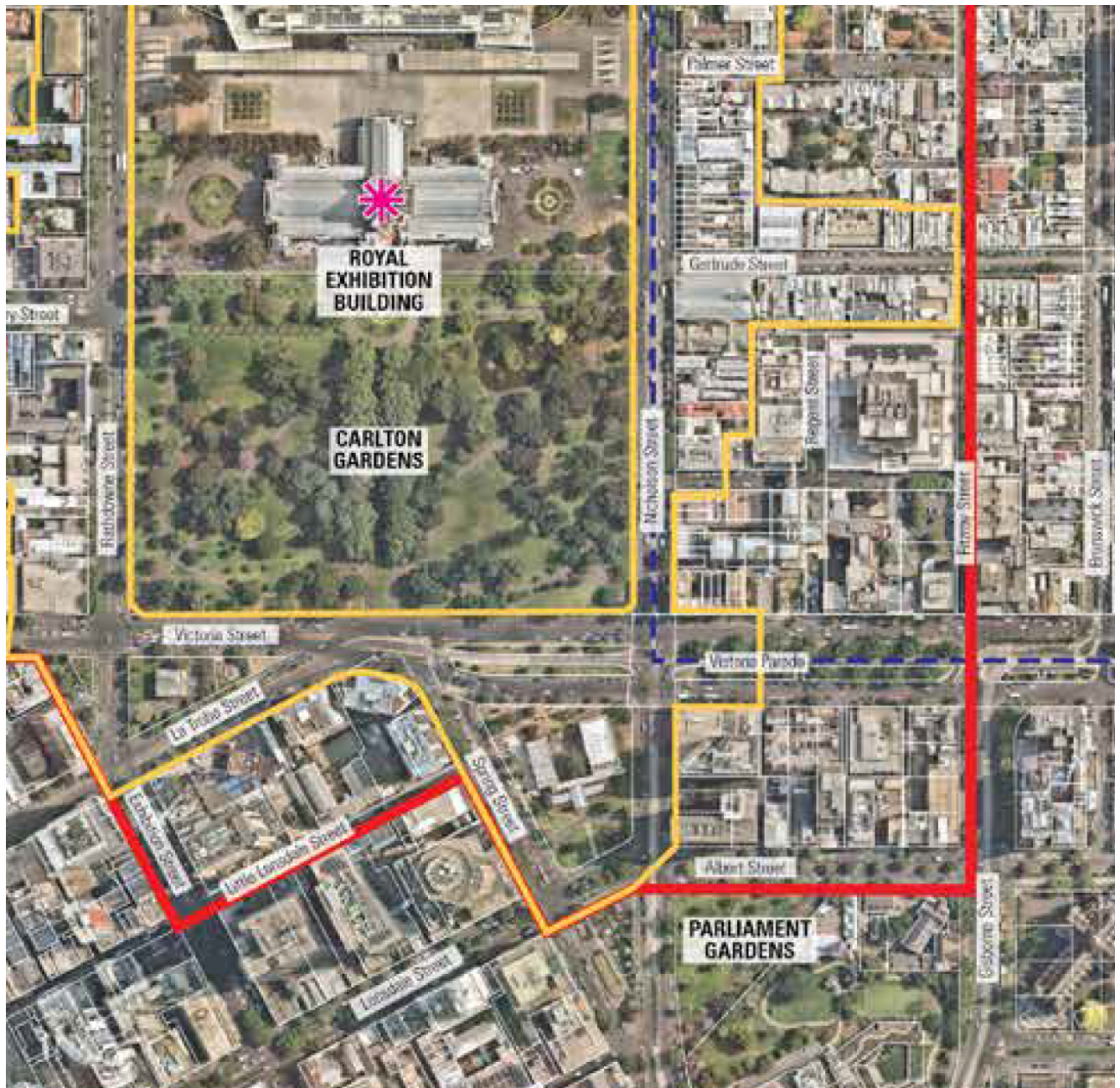


Figure 2, Existing WHEA Boundary (Red Line; Source: Draft Review of the World Heritage Strategy Plan, p. 12).

This site is a gateway to the World Heritage site and to the South Fitzroy Precinct (HO334), particularly to the spectacular, intact Victorian frontage along Nicholson Street which frames the Royal Exhibition Building. It is also a gateway to the Carlton Gardens and the Royal Exhibition Building from Victoria Parade. That is the context which is relevant here.

The Treatment of Brennan Hall

The proposed demolition of Brennan Hall, leaving only the façade and 7.5 metres behind it would seriously affect the significance of this historically important heritage building. Moreover, the applicant foreshadows the ‘full demolition’ of Brennan Hall, which ‘would be explored as part of a future proposal’ (Lovell Chen, *Heritage Impact Statement [HIS]*, p. 31). The Design Review Panel noted, ‘considerable value in its retention given its cultural and institutional significance and the

international context of it being one of only four (of its type) in the world'.²² Most importantly, demolition of Brennan Hall, partial or full, would negatively impact the urban context of the World Heritage site.

Brennan Hall was built the year after the 1888 Exhibition took place at the Royal Exhibition Buildings. It is a key part of the original setting as well as being important to Victoria's history. As described in the National Trust's statement of significance:

Historically, the Hall of Science is the only physical reminder of the early Freethought movement in Victoria, one of two states in Australia where the movement had a notable presence. ... The Hall of Science is not only a unique building in Victoria but also a rare surviving purpose-built Freethinkers' or Humanist Hall internationally since only four other halls are known to survive in the world. One is in Sydney (1890), two in Great Britain, and one in the United States; and Melbourne's is the second oldest. (National Trust of Australia (Victoria), Statement of Significance, quoted in *HIS*, p. 11).

In their 2003 St Vincent's Hospital Heritage Appraisal, the consultants for the current project, Lovell Chen (then Allom Lovell & Associates) accepted the building's historic significance and gave it top rating ('good') for intactness. They noted that 'The preferred approach to the interiors would be one that retained open plan. Generally, new interior works should have a minimal impact on original fabric and should be reversible'. The consultants noted in 2003 that, 'erected in 1889, Brennan Hall has a substantially intact façade with an unusual curved gable parapet. As an individual building it is an important element in the streetscape'. Of special note in the current context, the same consultants stated flatly that 'Demolition of the building [Brennan Hall] is not acceptable'.²³

Now the same consultants, in view of St Vincent's proposal to demolish the rear section of Brennan Hall, leaving only the front seven metres, argue that 'demolition of the Aikenhead Wing will ... impact on the existing fabric and structural stability of Brennan Hall'. Ease of construction is never an acceptable justification for demolition of a heritage building. Furthermore, Lovell Chen admit that 'The interior of the building was not inspected'.²⁴ Serious consideration should be given to the heritage significance of this building before demolition of the rear portion is permitted.

The proposed treatment of what would remain of the exterior portion if partial demolition were permitted is also problematic; indeed it is disrespectful. Brennan Hall should be retained and conserved in its original form. However, the same consultants now propose a 'new structure [which] incorporates external supports to the façade which will be visible in views to the building from the public realm'.

Not enough, in our view, has been made at the committee hearing of this proposal. The diagrams available are not renders but we submit that the proposed treatment would utterly disfigure the façade, whose 'significant' contribution to the streetscape and WH context the applicant accepts. The rationale for demolishing much of the hall depends on the preservation of the façade, but the façade so disfigured would no longer arouse support for its preservation.

As it happens, the only justification offered for these 'external supports' is that they will be temporary—'an interim outcome'—because 'future works to this building, **including the potential for adaptation or full demolition** [emphasis added], would be explored as part of a future proposal'. In other words, the rear of the building can be demolished and the façade propped up with a temporary external structure because it is planned to demolish it in the future.²⁵

²² Victorian Design Review Panel, [Report], pp. 3-4.

²³ *HIS*, pp. 11, 78.

²⁴ *HIS*, pp. 12, 20.

²⁵ *HIS*, p. 31.

Now this foreshadowed ‘full demolition’, which has not to our knowledge been repudiated or made the subject of conditions, will be much easier once the façade loses its interest.

The least that can be said for this approach is that it flags brazenly its disregard for the heritage building and attempts to forestall a discussion of demolition by providing externally visible supports in order to make full demolition in the near future more acceptable. We submit that the if demolition has so recently been deemed not acceptable on heritage grounds and the ‘good’ state of the building, the building’s partial demolition and the construction of temporary visible external supports on a remnant façade cannot be justified. The construction of the replacement building must not only be limited to the current Aikenhead footprint, but also planned so as to preserve surrounding buildings, in particular those with heritage significance. We urge the Minister to refuse approval for the proposed partial demolition and façadist treatment of Brennan Hall.

Conclusion

The proposal as it stands is harmful to the World Heritage values of the site. Its location demands a design response to the site which acknowledges its context as a key part of the World Heritage Environs Area and of the South Fitzroy Precinct.

(Professor) Charles Sowerwine, FAHA, FRHSV,
Chair, Heritage Committee,
Royal Historical Society of Victoria.
10 August 2021.

Appendix: Australian Government Commitments for World Heritage Site

In securing World Heritage listing, the Australian Government, in its response to the ICOMOS Report on the nomination of the site for World Heritage listing, noted that not only were the REB & CG protected but also that ‘any action which may have a significant impact on a world heritage property, *whether inside or outside the boundaries* of the property, is prohibited [emphasis original]’. It further noted that ‘all planning policies in these [i.e. the surrounding] areas discourage the demolition of Victorian-era buildings and require any development to enhance heritage values. These provisions would also apply to any redevelopment of existing modern buildings around the site’. Finally, the Australian Government noted that ‘the State Minister for Planning intends to enact a special provision to establish a formal buffer zone around the site’. The zone as proposed to UNESCO covered the St Vincent’s site.²⁶

Subsequently, despite these promises, the buffer zone was divided into the Area of Greater Sensitivity and that of Lesser Sensitivity (a distinction nowhere mentioned in the Australian submission documents and never agreed to by UNESCO), and St Vincent’s site was excluded from the Area of Greater Sensitivity, thus effectively excluding it from the protections promised for the WHEA. The exclusion of an area that could have such impact on the WH site represents a retreat from the positions used to justify the nomination, if not a betrayal of promises.

²⁶ ‘Australian Government Response to the ICOMOS Assessment Report on the Royal Exhibition Building & Carlton Gardens World Heritage Nomination’, 9 June 2004, <https://whc.unesco.org/uploads/nominations/1131bis.pdf>, pp. 12, 13.

Map 1. Royal Exhibition Building and Carlton Gardens and surrounds, indicating areas protected under the *Heritage Act 1995*, Heritage Overlay and possible buffer zone.

