



## **ROYAL HISTORICAL SOCIETY OF VICTORIA INC.**

239 A'Beckett Street, Melbourne 3000

**Submission to the Hon Sussan Ley MP, Minister for the Environment**

**re.: Reference Number 2021/8988**

**St Vincent's Hospital (Melbourne) Limited/Commercial Development/27 Victoria Parade,  
Fitzroy/Victoria/St Vincent's Hospital Melbourne Aikenhead Wing Demolition**

On behalf of the Royal Historical Society of Victoria, I submit this response to the Invitation for Public Comment on this proposal. This proposal clearly constitutes a controlled action needing approval under the EPBC Act because, if approved, it would have a significant impact on the heritage values of the World Heritage site, the Royal Exhibition Building and Carlton Gardens.

The Royal Historical Society of Victoria functions both as the peak body for the 340 local history societies throughout 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. 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.

We note that the referral for this submission is only for demolition of the Aikenhead Wing and partial demolition of Brenan Hall. The proposal to replace the Aikenhead Building is only foreshadowed here, although it has already progressed through rejection by the responsible authority to be called in by Victoria's Minister for Planning. We therefore submit that to refer only the demolition of the existing buildings is an act of bad faith.

We submit that the responsible Commonwealth Minister is bound to refuse approval of this application because it involves the partial demolition of a significant heritage building, namely Brenan Hall (and future total demolition is foreshadowed in the application to the responsible authority). Brenan Hall constitutes a significant and authentic part of the surrounds of the World Heritage site as experienced by visitors in the late 19th and early 20th centuries. It makes an important contribution as a well-preserved surviving example of the public institutions that surrounded the site in the Victorian era. A visitor approaching the Royal Exhibition Building from Victoria Parade, in 1900 as today, would experience Brenan Hall as one of the many public institutions that constituted the city-side surrounds of the Royal Exhibition Building and Carlton Gardens. Brenan Hall is now one of a much-reduced number of such buildings and, on that ground alone, is of importance for its contribution to the surrounds. It is also of importance as a heritage building in its own right.

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Email: [office@historyvictoria.org.au](mailto:office@historyvictoria.org.au); reply to: [c.sowerwine@gmail.com](mailto:c.sowerwine@gmail.com).

ABN 36 520 675 471

I elaborate our argument below.

### **The Significance of the Royal Exhibition Building 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. That makes the site of the utmost value to the whole nation as well as to Victoria, a state shaped so powerfully in the half-century following the Gold Rush, and to Melbourne, still one of the world's greatest and most intact Victorian cities, as Lord Asa Briggs wrote in his classic *Victorian Cities* (1963: 277ff).

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 Melbourne in the minds of contemporaries and represented the young city to the world. In housing the 1880 and 1888 Exhibitions it put the Australian colonies on the international map and became the incarnation of what was then widely known as ‘Marvellous Melbourne’. With the opening of Federal Parliament in the main hall of the Exhibition Building in May 1901 and the inauguration of Melbourne as the first national capital, the REB also became the incarnation of the new nation, immortalised in Tom Roberts’ iconic painting, ‘Big Picture’, and in countless widely disseminated engravings, which have made it part of the Australian imaginary for well over a century.

The Exhibition Building’s international status, however, derives more from two unique factors. On the one hand, it is the only surviving intact hall for two of the great international exhibitions (1880 and 1888), which were so significant in the shaping of 19th-century world culture and the celebration of industrial advancement. On the other hand, it is also exceptional in being situated in its original surrounds, that is the Carlton Gardens and the Victorian built fabric of Carlton, Fitzroy and the City. 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*’.<sup>1</sup>

UNESCO’s Operational Guidelines require a ‘buffer zone’ (the World Heritage Environs Area in Victorian planning law). This buffer zone is important, as the guidelines note, ‘to protect views and other areas or attributes that are functionally important as a support to the property and its protection’. As the Commonwealth promised to provide this buffer zone in seeking World Heritage nomination, it is incumbent on the responsible Minister to ensure the buffer zone operates effectively to maintain the world heritage values of the site.

The surrounds now designated as the World Heritage Environs Area (hereinafter WHEA) are still largely suggestive of the kinds of built form predominating at the time of the 1880 Exhibition; a tourist transported from 1880 or 1888 to the present would find nothing surprising in 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 status: ‘The Royal Exhibition Building in its original garden setting is the

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<sup>1</sup> ‘Decision of the World Heritage Committee’, 7<sup>th</sup> July 2004, File Name: 1131, <https://whc.unesco.org/uploads/nominations/1131bis.pdf>.

most authentic remaining example of an in situ Palace of Industry from a significant international exhibition.<sup>2</sup>

The significance of this site, taken as a whole—the Royal Exhibition Building, the Carlton Gardens, and the surrounds—cannot be overestimated. ‘The expositional 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.<sup>3</sup> All this was recognised in its nomination as a World Heritage site and in Australia’s acceptance of the UNESCO buffer zone requirements.

### **The Importance of the Aikenhead Wing/Brenan Hall Site to the World Heritage site**

The site of the proposed demolitions is of prime importance to the World Heritage site. As discussed above, the surrounds (or buffer zone) are crucial to the World Heritage values of the site. As the Commonwealth promised to provide this buffer zone in seeking World Heritage nomination, it is incumbent on the Minister to ensure the buffer zone operates effectively to maintain the world heritage values of the site. The corner of Victoria Parade and Nicholson Street abuts the Carlton Gardens, which constitute the Gateway to the Royal Exhibition Building. The treatment of this site is crucial to the cultural heritage values of the 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* [emphasis added]’. 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 response included a map (Map 1, below) showing the ‘probable configuration’ of that buffer zone. The zone covered the St Vincent’s site.<sup>4</sup> Nowhere was there any question of dividing the zone into areas of greater or lesser significance; the division first appeared in the Strategy Plan 2009. A revised Strategy Plan for the WHEA, part of the required 7-yearly revision of the World Heritage Management Plan, is currently underway. The final form of the WHEA Draft Strategy Plan (2021) recommends abolition of the distinction between areas of greater or lesser significance, a distinction that was never approved by the World Heritage Committee. The Aikenhead Building and Brenan Hall are indisputably part of the WHEA as originally conceived and recommended in the new strategy, and thus the current proposal for demolition and partial demolition before the Minister should only be considered in the context of the detailed plans for future development, which have not been provided as part of this referral.

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<sup>2</sup> ‘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.

<sup>3</sup> *Ibid.*, p. 2 and Appendix 1: Statements by International Experts.

<sup>4</sup> ‘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.

Although the proposal for replacement of the Aikenhead Wing has been omitted from this referral, we note that, according to the proponent, ‘the new ACMD Building will largely adopt the existing footprint of the Aikenhead Wing’.<sup>5</sup> This would logically render the partial demolition of Brenan Hall unnecessary, especially as the applicant foreshadows future demolition.

The aim of the buffer zone (whether lesser or greater significance) is to ensure that the surrounds of the World Heritage site retain their cultural value as supportive of the World Heritage site itself. Brenan Hall makes a significant contribution to the site’s 19th-century fabric and cultural context. The Minister’s duty to protect the World Heritage site, as promised to UNESCO, requires her to refuse the application to demolish Brenan Hall.

### **Brenan Hall (Former Hall of Science, 1889)**

Brenan 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.*<sup>6</sup>

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. In regard to the interior, 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’.<sup>7</sup> This is consistent with the Australia ICOMOS Burra Charter’s principles of heritage conservation.

Now the same consultants, in view of St Vincent’s proposal to demolish the rear section of Brenan Hall leaving only the front seven metres, argue that ‘demolition of the Aikenhead Wing will ... impact on the existing fabric and structural stability of Brenan 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’.<sup>8</sup> 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. The consultants noted in 2003 that, ‘erected in 1889, Brenan Hall has a substantially intact façade with an unusual curved gable parapet. As an individual building it is an important element in the streetscape’.<sup>9</sup> As such Brenan Hall should be retained and conserved in its original form. However, the same consultants now propose a ‘new

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<sup>5</sup> Lovell Chen, St Vincent’s Hospital Melbourne – Aikenhead Wing, Proposed demolition, Referral report and Heritage Impact Statement, p. 33.

<sup>6</sup> National Trust of Australia (Victoria), Statement of Significance, quoted in HIS, p. 11

<sup>7</sup> Quoted in Lovell Chen, ‘St Vincent’s Hospital Aikenhead Centre for Medical Discovery, Heritage Impact Statement’, August 2020 (hereinafter HIS), p. 11.

<sup>8</sup> HIS, pp. 12, 20.

<sup>9</sup> HIS, p. 11.

structure [which] incorporates external supports to the façade which will be visible in views to the building from the public realm’.

The only justification offered for these ‘external supports’ is that this will be temporary because ‘the proposal for Brenan Hall is an interim outcome and that future works to this building, **including the potential for adaptation or full demolition** [emphasis added], would be explored as part of a future proposal’.<sup>10</sup> 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.

The least that can be said for this approach is that it flags brazenly its disregard for the heritage building by proposing to forestall a discussion of demolition through the provision of externally visible supports in order to make full demolition in the near future more acceptable. This is an attempt to limit opposition by incremental destruction. In 2003, the same consultants stated flatly that ‘Demolition of the building [Brenan Hall] is not acceptable’.<sup>11</sup> 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 other treatment of Brenan Hall.

### **Conclusion**

We therefore submit that this referred application should be rejected by the Minister. The Minister should refuse approval to any demolition of Brenan Hall and insist that the applicant submit the entire proposal for referral, including future plans for the replacement of the Aikenhead building. Demolition of the existing building offers an opportunity to better respond to the enormously important World Heritage site than either the existing building or the current proposal for a much taller and more obtrusive building currently before Victoria’s Minister for Planning. We will be calling on the Commonwealth Minister for the Environment to ensure that any development of this site enhances the World Heritage-listed Exhibition Building and Carlton Gardens.

(Professor) Charles Sowerwine, FAHA,  
Chair, Heritage Committee,  
Royal Historical Society of Victoria.  
31 July 2021.

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<sup>10</sup> HIS, p. 31.

<sup>11</sup> HIS, p. 78.

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

