



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

28 September 2022

Mr Steven Avery
Executive Director
Heritage Victoria

heritage.permits@delwp.vic.gov.au File No.: B6435

Expansion of Objection to Permit Application P34375, No. 2 Goods Shed, 707 Collins Street, Docklands and 733 Bourke Street.

Dear Mr Avery,

We have now had the opportunity to view the extensive documentation for this proposal and wish to quantify and add some further comments by way of expansion on our objection submitted on 30 August.

We suggest that the extent to which this proposal would impact on the fabric and setting of the heritage place can best be appreciated by comparing drawings on pages 45 and 46 of the Urban Context Report and contemplating the drawing on page 53¹ (see page 3).

The drawing at page 45 shows the current extent of the two halves of the goods shed. We have estimated that tragically some 19% of the length of the goods shed has been lost to the Collins Street extension and the Pavilion building to the north and Lantern to the south of the street.

The drawing on page 46 shows the extent to which the shed will be further demolished and where the central bay only will be reconstructed. There will be only a minor extension to the central bay on the southern side of Collins Street and no extension to the central bay to the north. We have estimated that this brings the total extent of the demolition of the shed to 41% of its original length with partial reconstruction of only the central bay..

The part section and part perspective drawing on page 53 is a good illustration of the extent to which the two proposed towers would sit above the shed. These buildings do not just cover the reconstructed part of the shed but overhang retained historic fabric both to the north and south so we now estimate that the extent to which the shed is seriously impacted would reach 45% of its original length.

This drawing also shows that the central bay will not be fully reconstructed but will be chopped up into sections to allow for circulation from one side of the lobby to the other.

¹ Reference is made to the page number 'printed' on the page, not the 'electronic' page number shown in the title heading.

The RHSV considers that development that will involve such an extensive loss of fabric and will bring the extent of seriously impacted area from 19% to 45% is not to be contemplated for an outstanding State registered building

The suggestions for bringing more active uses to the goods shed is certainly to be supported but not at the cost of the extensive loss of significant fabric proposed. There is also the risk that the crowds shown in the attractive sketches and photos of the new activities may not eventuate. This is why any proposal for a highly significant building must first address the need to retain its fabric.

This proposal does not meet this essential objective. First there is the extensive loss of the outer bays. Second, there is extensive 'building over' of a heritage building, a practise that is now thoroughly discredited as a conservation measure. This is going to be one gloomy place under these massive towers. Thirdly the segmented reconstruction of the central bay, without its lateral bays, would result in parts of the lantern poking up into the foyer. This reduces the building to a series of smart sculptures, remnants that trivialises the whole idea of historic conservation.

We therefor respectfully urge you to maintain Heritage Victoria's original position that Heritage Victoria is:

- . 'not supportive of further demolition of the No.2 Goods Shed and would only contemplate towers which had a similar impact to the footprint of the existing buildings and allowed for greater visibility of the Goods Shed from Collins Street'. ^[1]_{SEP}²

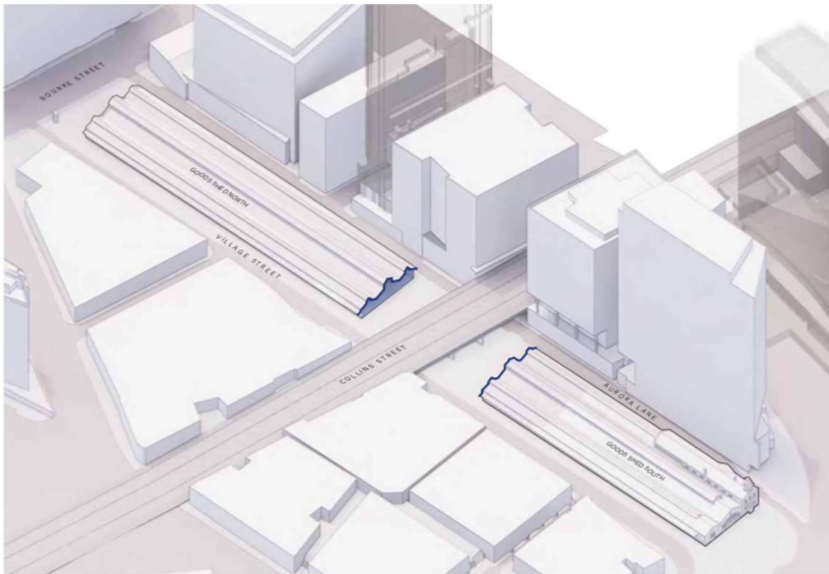
We ask that these remarks be considered as an expansion of our original submission. However if that is not acceptable we ask that these comments be considered a relevant matter under s.101(b) of the Heritage Act 2017.

Yours sincerely

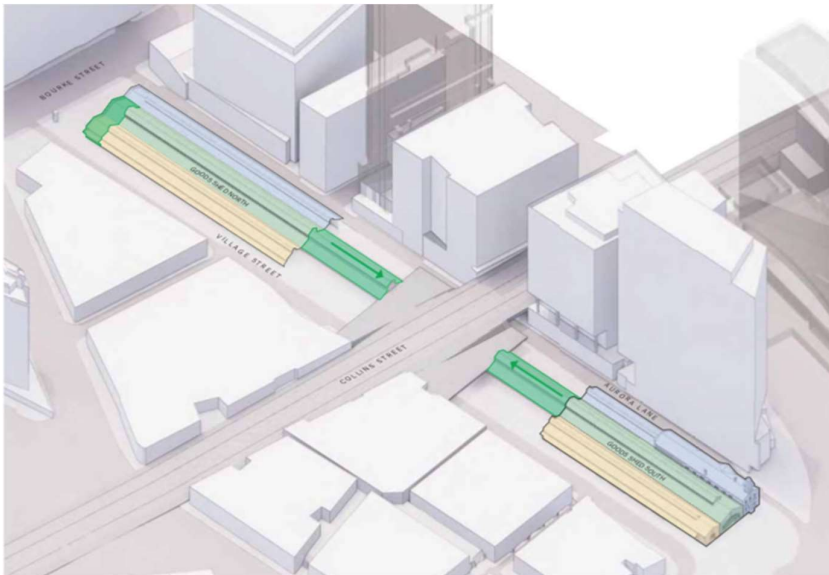
Ian Wight
Deputy Chair
RHSV Heritage Committee

² Correspondence from Nicola Stairmand to Peter Lovell quoted on page 30 of the Heritage Impact Report.

ILLUSTRATIONS



Drawing from Page 45



Drawing from Page 46



Drawing from page 53