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James Sutherland
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NTAV File ref.: B6771 St Vincent's Hospital Victoria Parade, Fitzroy (file only)
 B0535 Dodgshun House (also known as Edensor, 9 Brunswick Street, Fitzroy)
 B0172 Former Belvidere Hotel (also known as Eastern Hill Hotel, 77 Victoria
 Parade, Fitzroy)

Re: 59-77 Victoria Parade and 5-7 Brunswick Street and 20-32 Fitzroy Street, Fitzroy
Permit no: PLN16-0925

Dear Mr Sutherland,

I write to you in regards to the proposed redevelopment of St Vincent's Private Hospital, encompassing multiple street addresses as specified above, which proposes the 'demolition of several existing buildings on the site, partial demolition of other buildings and the construction of a new eleven storey hospital building' (Lovell Chen Heritage Impact Assessment, pg. 1). The National Trust submits that this permit application will have a significant and irreversible impact on a number of heritage-listed buildings across the site, and as such, should not be approved in its current form. This objection is based primarily on heritage grounds, insofar as it relates to the National Trust listed properties Dodgshun House and the Former Belvidere Hotel, and the largely intact historic streetscape of Victoria Parade and Brunswick Street more generally. In addition, the National Trust does not support the full demolition of Easthill House, identified as individually significant under the Heritage Overlay, or agree with the statement included in the Heritage Impact Assessment that the full demolition of this building 'can be supported in heritage terms' (LC Heritage Impact Assessment, pg. 34).

The National Trust strongly believes that the level of demolition and alteration proposed for the existing heritage fabric does not provide an acceptable balance across the site. While our

organisation is not against the redevelopment of the site to allow for the growth of the hospital and hospital services, we do not believe that enough of the existing heritage fabric has been incorporated into the design to consider the new development a positive outcome in terms of heritage. We also have considerable concerns regarding the scale and bulk of the proposed tower, and the extent to which it will overwhelm the retained heritage fabric, existing view lines, and the largely intact streetscape.

In addition, we note that both Dodgshun House (VHR H1706) and the Former Belvidere Hotel (VHR H0816) are included in the Victorian Heritage Register. We submit that it is inappropriate for a planning permit to be issued before a heritage permit is granted by Heritage Victoria, based primarily on the immense heritage impacts proposed. The National Trust will provide a more detailed assessment of the proposed demolition and impact proposed for Dodgshun House and the Former Belvidere Hotel once a heritage permit application has been submitted and advertised by Heritage Victoria.

1.0 National Trust Heritage Register: Significance

1.1 Dodgshun House (Eye & Ear Hospital Nurses Home) (File no. B0535), 9 Brunswick Street, FITZROY

NTAV Statement of Significance (classified 'Regional' 12.10.1960):

It is a grand Corinthian-Tuscan Villa with arcaded verandah to the east front, and elaborate architectural treatment of the south or garden facade (in contrast to the plain north wall). The central part of the front wall, and the gatehouse are of early 20th century date.

1.2 Former Belvidere Hotel, (File no. B0172), 77 Victoria Parade and Cnr Brunswick Street, FITZROY

NTAV Statement of Significance (classified 'Regional' 17.07.1958):

A two storied Hotel designed by Robert Russell, built in 1853 and altered in 1866. As the Belvidere Hotel it was the headquarters of the successful Eight Hour Movement in March - April 1856.

2.0 Yarra Planning Scheme

We believe the proposed re-development is inconsistent with *Clause 43.01 Heritage Overlay*, and in particular the following listed purpose of the HO:

To ensure that development does not adversely affect the significance of heritage places.

We note, as stipulated under *43.01-4 Decision guidelines*, before deciding on an application, the responsible authority must consider:

Whether the demolition, removal or external alteration will adversely affect the significance of the heritage place.

The National Trust submits that the demolition proposed as part of this permit application will have a significant and irreversible impact on a number of heritage-listed buildings located within the site.

In addition, we do not believe the permit application is consistent with the objectives of *Clause 22.02 Development Guidelines for Sites Subject to the Heritage Overlay, specifically:*

- *To conserve the historic fabric and maintain the integrity of places of cultural heritage significance*
- *To encourage the preservation, maintenance, restoration and where appropriate, reconstruction of heritage places*
- *To ensure the additions and new works to a heritage place respect the significance of the place*
- *To encourage the retention of 'individually significant' and 'contributory' heritage places*

More specifically, *Clause 22.02.5-1 Demolition: Full Demolition or Removal of a Building* encourages the retention of a building unless:

- *The building is identified as being not contributory.*
- *The building is identified as a contributory building and,*
 - *New evidence has become available to demonstrate that the building does not possess the level of heritage significance attributed to it in the incorporated document, City of Yarra Review of Heritage Areas 2007 Appendix 8, revised February 2017, and*
 - *the building does not form part of a group of similar buildings.*

The National Trust submits that neither Dodgshun House nor the Former Belvidere Hotel meets either of the concessions listed in the dot-points above. Both places clearly reach the threshold for individual local significance, and no new evidence has been provided to demonstrate that this level of heritage significance has been diminished. Further, the National Trust strongly contends that both buildings are unique for their class and do not 'form part of a group of similar buildings'. This is further emphasised by the fact that both buildings are included for their individual significance on the Victorian Heritage Register (based on their significance to the State).

Further, as noted under *Clause 22.02.5-1 Demolition: Removal of a Part of a Heritage Place or Contributory Elements:*

- *Generally discourage the demolition of part of an individually significant or contributory building or removal of contributory elements unless:*
 - *That part of the heritage place has been changed beyond recognition of its original or subsequent contributory character(s).*

And more specifically:

- *For individually significant buildings or works, it can be demonstrated that the removal of part of the building or works does not negatively affect the significance of the place.*

Conclusion

Thank you for the opportunity to comment on the above permit application. In summary, the National Trust does not support the proposed redevelopment of St Vincent's Private Hospital as it currently stands. Should you have any questions please contact our Advocacy staff on 9656 9837.

Kind Regards,

A handwritten signature in black ink, appearing to read 'F Watson', with a long horizontal flourish extending to the right.

Felicity Watson
Advocacy Manager