



8 February 2022

Mr Steven Avery
Executive Director
Heritage Victoria
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East Melbourne
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Re: Objection to Permit Application P33423 Titles Office, 247-283 Queen Street, Melbourne (VHR H1529)

Dear Mr Avery,

The National Trust of Australia (Victoria) objects to the above permit application to adapt the former Land Titles Office for use as commercial and community spaces, and construction of a high rise tower over the former Strong Room building.

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing more than 30,000 members and supporters across Victoria. As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

The former Land Titles Office is one of Victoria's most prominent and significant civic buildings, noted in the statement of significance as having "one of the most extensive public building facades in Melbourne", spanning a full city block.

The primary purpose of the *Heritage Act 2017*, as stated at Section 1(a) of the Act, is to provide for the protection and conservation of the cultural heritage of the State.

When making a permit determination, under Section 101 the Act, the Executive Director is required to consider:

(a) the extent to which the application, if approved, would affect the cultural heritage significance of the registered place or registered object;

(b) the extent to which the application, if refused, would affect the reasonable or economic use of the registered place or registered object;

With regard to the first consideration, it is our submission that the proposed development would have an adverse and unacceptable impact on the registered place.

We acknowledge that this application improves on the 2017 scheme for this site, particularly in terms of physical impacts on the fabric of the Strong Room. We also strongly support the proposed conservation of the former Land Titles Office complex.

However, we object to the adverse and irreversible impact on the architectural and aesthetic significance of the place that would arise from the development of a tower over the former Strong Room building, which would loom over the heritage building in views from all sides. Fundamentally, we do not believe that a high-rise tower can be accommodated on this site without adversely impacting on the cultural significance of the place for the reasons previously set out by Heritage Victoria in its refusal of the 2017 proposal.

With regard to the consideration of reasonable or economic use, the proposed use of the building for commercial office space is supported, and continues the building's historic use.

We also support the intention of the proponent to provide public access to the former Strong Room, which due to its role as a secure storage facility has largely been obscured from public view throughout its history. However, we do not believe the provision of "affordable community space" in this location mitigates the impacts on the cultural heritage significance of the place. As a privately-owned property, there is no guarantee that this use will continue into the future.

With regard to economic use, we note that the applicant's documentation relating to this (as listed in the Heritage Impact Statement) has not been made public:

- Roger Gibbins, Former Land Titles Office 247 to 283 Queen Street, Melbourne Report on 'Reasonable or Economic Use' December 2021).
- Cost Plan for Economic Use Assessment, Land Titles Office Site Redevelopment, November 2021 (Updated) (included in attachments of Gibbins, Report on 'Reasonable or Economic Use' December 2021)

We are therefore unable to meaningfully comment on the case for the economic use of the place.

In summary, we object to the application on the basis that the proposal would adversely impact the cultural significance of the Land Titles Office. As one of the state's major nineteenth-century public buildings, it should be treated as sympathetically as possible.

Should you require any clarification on our position, I welcome you to contact me at felicity.watson@nattrust.com.au or on 9656 9802.

Yours faithfully,



Felicity Watson
Executive Manager, Advocacy
National Trust of Australia (Victoria)