



29 August 2022

Mr Steven Avery
Executive Director
Heritage Victoria
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East Melbourne
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File No.: B6435

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

Dear Mr Avery,

The National Trust of Australia (Victoria) objects to the above permit application for the demolition and partial reconstruction works to the No. 2 Goods shed to facilitate the construction of two towers (47 levels and 38 levels) in place of the existing Pavilion and Lantern buildings.

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 40,000 members and supporters across Victoria.

The National Trust of Australia (Victoria) has Classified the former Goods Shed as a place of National Significance. The Statement of Significance for the place, written prior to the Collins Street extension project which resulted in the demolition of 9 bays in the centre of the building, notes the following:

The former "A" Goods Shed is architecturally significant at the National level. It is a highly prominent part of a significant group of buildings in the docklands area and is one of the most significant railway structures in the State. It is certainly the largest and most architecturally pretentious railway goods building in Victoria. It particularly reflects the importance of goods handling in the Melbourne yard. Located adjacent to the docks, it was the major Outwards Shed from the time of its construction - each of the fifty-four external arched openings were dedicated to a different part of the Victorian railway system. The form of the building clearly demonstrates these methods of goods handling before trucks and containerisation. The building, remarkably, still fulfills its original function, though at a greatly reduced scale.

The rustic-Italianate architectural style of the building is comparable to, but more ornate than, the Newport Workshops and other industrial buildings of the era, and it is more intact.

The heritage values recognised by the National Trust, as well as the Victorian Heritage Register Statement of Significance remain evident in the place, and it is one of the few remaining historic places providing a tangible connection to the rich industrial history of Docklands.

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 cultural heritage significance of the registered place.

We recognise the positive heritage impacts arising from the proposal to provide improved public access and interpret the spatial form of the original structure through the reconnection of the north and south goods sheds. However, we do not consider that these measures mitigate the extent of demolition proposed to facilitate the tower construction, noting that the extent of demolition and reconstruction proposed is contrary to the policies in the Conservation Management Plan.

With regard to the consideration of reasonable or economic use, the Applicant has not demonstrated that the proposed height and footprints of the twin tower buildings are necessary to enable the economic use of the place, including the long-term conservation of the heritage place.

As outlined in the response to Heritage Victoria's Request for Further Information dated 8 August 2022 we note that the Applicant has declined to provide information regarding the extent to which a reduction in the scale of the development would impact the economic use of the place and its long-term conservation.

We also note the comments of the Victorian Design Review Panel outlined on p3 of the Planning Report at Attachment K, which identified the following issues:

- Questioning of the appropriateness of the scale of intervention needed to accommodate the proposed twin tower configuration given the site's significance. Demolition and percentage loss of heritage fabric required more careful evaluation and a more sensitive approach.*
- Two slender vertical forms have the potential to create an interesting counterpoint to the long horizontal form of the Goods Shed. However, the slenderness ratio needs to be re-addressed (current floor plate is too big and the two towers need to be more like 'needles')*

The National Trust agrees with the assessment of the Design Review Panel, and it is our view that the footprint and height of the towers should be further reduced to minimise the need for demolition and reconstruction of significant fabric, and better respond to the scale of the Goods Shed.

In summary, we object to the application on the basis that the proposal would adversely impact the cultural significance of the No. 2 Goods Shed. 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,

A handwritten signature in black ink, appearing to read 'F. Watson', written in a cursive style.

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