

28 February 2023

6 Parliament Place  
East Melbourne  
VIC 3002

Mr Steven Avery  
Executive Director  
Heritage Victoria  
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Melbourne VIC 3000

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T 03 9656 9818

**File No: B6083 Tea House Southbank**

**Re: Permit application P33108 – Robur Tea Building, 28 Clarendon St, Southbank**

Dear Mr Avery,

The National Trust of Australia (Victoria) objects to the above permit application for part demolition and adaptation of the Robur Tea House building and the development of interconnected towers; four to the south boundary (of 13, 27, 24 and 17 levels), one to the west boundary (6 levels) and two to the north boundary (of 5 and 3 levels).

The National Trust of Australia (Victoria) has Classified the Robur Tea House as a place of State significance. The Robur Tea House Statement of Significance as listed on the Victorian Heritage Register notes:

*The Robur Tea Building is of architectural significance as one of the finest and most prominent examples of a 19th century warehouse in Melbourne. It was for many years one of the tallest buildings outside the CBD, its height and freestanding character making it a South Melbourne landmark even today. The functional requirements of a warehouse are clearly evident in its simple box-like shape, but a certain amount of pride is expressed in the restrained decoration of the eastern façade.*

When making a permit determination, under Section 101 of 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](#);

Regarding 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. As the development proposal would significantly impact the landmark values of the site by blocking views to the building.

We note that in 2018 Heritage Victoria refused a permit application to construct a new building, on the grounds that a 24 storey tower would have a substantial detrimental impact

on the cultural heritage significance and the setting and views of the place; and that viable economic use of the place did not require the level of change proposed. The National Trust is of the view that the current application does not suitably address the previous reasons for refusal, and we consider it would cause an unacceptable impact on the landmark qualities and freestanding character of the building.

In summary, we object to the application on the basis that the proposal would adversely impact the cultural significance of the Robur Tea House. Should you require any clarification on our position, I welcome you to contact me at [madeleine.moore@nattrust.com.au](mailto:madeleine.moore@nattrust.com.au) or on 9656 9879.

Yours sincerely,

A handwritten signature in black ink that reads "Maddi Moore". The signature is written in a cursive, slightly slanted style.

Maddi Moore

Acting Manager—Advocacy

National Trust of Australia (Victoria)