

05 September 2024



The Hon. Sonya Kilkenny MP
Minister for Planning
Development Approvals
Department of Transport and Planning

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Re: Objection to PA2403006, Former Taxation Office, 436 Lonsdale Street

Dear Minister,

The National Trust of Australia (Victoria) objects to the above permit application for a part demolition of the existing building and construction of a 23-storey building at the former Taxation Office, 436 Lonsdale Street.

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 60,000 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 National Trust classified the Taxation Office in 1994 at the level of regional significance. The site is protected under the City of Melbourne planning scheme through local Heritage Overlay (HO717) as an individually significant building. The Statement of Significance for the site notes,

The Taxation Office was built in 1924 to a design by architects Oakley and Parkes. The two top floors were added by the PWD in 1935. The design of the building conveys a deliberate attempt to marry the Renaissance style of the adjacent Titles Office with the "Wall Street" image of a modern financial building. It is a notable indicator of the early establishment of the Commonwealth Government in Melbourne.

National Trust position on facadism

We find the current proposal, to demolish all but the Lonsdale Street facade of the of the former Taxation Office, is a clear case of facadism. The National Trust, as a matter of principle, does not support facadism as an acceptable heritage practice. Furthermore, the City of Melbourne [Heritage Design Guides](#) state, 'It is policy to: Encourage the retention of the three dimensional form regardless of whether it is visible whilst discouraging facadism.' The guide also defines facadism as, 'The retention of the exterior face/faces of a building without the three dimensional built form providing for its/ their structural support and understanding

of its function.' We are not satisfied that the application has provided any justification for ignoring the City of Melbourne policy on facadism, especially considering the practice is widely disliked by the community.

In 2021, the National Trust released a revised Facadism Policy contained within the [Facadism Discussion Paper](#), which notes the following,

Demolishing everything but the external face(s) of a building removes all evidence of how a building was used, its layout and arrangement, and the methods and materials of its construction - all of the things that made that building a lived place. The National Trust strongly believes that the heritage significance of a place is associated with that place as a whole. It is evident in the bricks and mortar, but also in its internal spaces, which provide evidence of its former use and story. It does not rest only in the facade, even if this may appear to be a building's most notable feature from the street level. If everything but the facade of a building has been demolished, it is no longer a building, and most of its heritage significance has been lost. Facadism should therefore not be considered an acceptable heritage outcome in the redevelopment of a heritage place. Furthermore, this loss of significance cannot be mitigated through a token setback of a new development only a few metres from the facade. Enough original fabric must be retained to ensure that the heritage place can be appreciated and understood.

In the first instance, the aim should be to retain as much significant heritage fabric as possible, and any changes to a heritage place must be guided by an understanding of its assessed values. The National Trust Facadism Policy states that 'historic multi-storey office buildings include internal spaces such as foyers, corridors, and stairs which are essential to understand their significance, and so retention of the whole building is strongly preferred.' We submit that at the very least the lobby and ground floor levels of the former taxation office should be retained.

Furthermore, the new development should be substantially set back behind the retained building and be able to be read as a separate building in the urban context. A minimum 10 metre setback should be applied to the proposal rather than the current 5 metres on Lonsdale Street, as the 18-metre setback from the Land Titles office is not an adequate balance for this lack of setback.

The new development must also be respectful of the building's character, appearance, scale, materials, style, and architectural expression.

Consideration of adaptive reuse

The National Trust strongly advocates for retrofitting and adaptive reuse of historic buildings to provide new uses for properties without requiring their demolition. We note that until 2021, the building was being used by a number of public services to conduct day to day operations. While we understand fire safety concerns lead to the former users ending their tenancy, we find the proposal of wholesale demolition is an extreme course of action. Especially when considering this is an individually significant building within a historic precinct, that has demonstrated its continued use throughout the building's lifetime. While we understand the applicant has noted constraints due to a lack of interest from potential users for a refurbishment of the building as office space, we are not satisfied that adaptive

reuse and retrofitting the existing building to convert it to a residential property has been meaningfully explored.

Additionally, we find this proposal goes against objectives of the Victorian Government's Built Environment Climate Change Adaptation Action Plan;

- *New and Existing Buildings – Consider the value of embodied energy contained in existing and heritage buildings (p13)*
- *Heritage – Identify and support conservation and adaptive reuse of heritage buildings as an alternative to new construction (p14)*

Considering the above, we further submit that potential risk of a lower quality proposal being sought should the current permit be refused is not an adequate justification for the current plans.

The National Trust does not find the current proposal to be an acceptable outcome. We would expect a proposal by State Government to be exemplary, especially regarding heritage, when the department proposing the design is responsible for managing building and heritage systems to shape places and communities.

Conclusion

The National Trust of Australia (Victoria) strongly opposes this application on the basis that facadism is an unacceptable heritage practice and the proposal would have an adverse impact on the heritage significance of the former Taxation Office and surrounding historic civic precinct.

We therefore respectfully request the Minister for Planning to refuse the application.

Should you require any clarification on our position, I welcome you to contact me at samantha.westbrooke@nattrust.com.au or on 9656 9818.

Yours sincerely,



Samantha Westbrooke
Executive Manager, Conservation & Advocacy
National Trust of Australia (Victoria)