

28 July 2017

Mr Steven Avery
Acting Executive Director
Heritage Victoria
8 Nicholson Street
EAST MELBOURNE VIC 3002

Tasma Terrace
4 Parliament Place
East Melbourne
Victoria 3002

Email: info@nattrust.com.au
Web: www.nationaltrust.org.au

T 03 9656 9800
F 03 9656 5397

File No: B0276

Re: Permit Application P23786—Ballarat Railway Complex to construct a hotel and the conversion of goods shed to a conference centre.

Dear Mr Avery,

We write in response to the permit application for adaptive re-use and new works at the Ballarat Railway Complex. The National Trust of Australia (Victoria) (the Trust) objects to the application, and submits that the permit should be refused in its current form. We do not consider that the proposal achieves an appropriate balance between activation and conservation, or that the proposed use of the Goods Shed is appropriate given the heritage values of the place.

The Trust took the opportunity to provide feedback on the concept plans for the Precinct Redevelopment in January of this year. At this time, we submitted that the proposed adaptive re-use of the Goods Shed would have unacceptable heritage impacts, and was not consistent with conservation policies for the site contained in the Conservation Management Plan. We also raised concerns regarding the visual impact of the hotel on the station complex and surrounding heritage places. Unfortunately many of these concerns do not appear to have been addressed in the permit documentation which has been provided to Heritage Victoria. We therefore make the following submissions in respect to the advertised permit application.

Documentation

In our previous submission to Regional Development Victoria, we requested for the Conservation Management Plan for the site to be made publicly available to assist the community's consideration of the proposed redevelopment. As yet, this document has not been made available.

We also submit concerns regarding the level of documentation provided with the current permit application. As the proposal includes the subdivision of the site, it is essential to ensure that overarching management documents are in place to guide development and maintenance across the site, and ensure that activities such as future development, conservation, wayfinding and interpretation are undertaken in a holistic way, rather than piecemeal and fragmented across the site.

We note the lack of detail in the application regarding the provision of services and the treatment of retail tenancies, and the request by the applicant for "in principle" approval for:

- *The introduction of new services to the Goods Shed*

- *General approach to the retail tenancy fitouts in eastern part of the Goods Shed¹*

Similarly, the Heritage Impact Statement indicates that a structural engineering report has not yet been prepared, which could identify further works required to rectify structural issues. We submit that any permit for works should include strict conditions requiring documentation to be submitted and approved by the Executive Director prior to the commencement of works, and that any further works should be consistent with policies outlined in the Conservation Management Plan. Guidelines should be developed for inclusion in future tenancy agreements to ensure that fit-outs and signage are sympathetic to the heritage character of the place.

Hotel

The proposed siting and footprint of the hotel building is generally supported, however its height and massing will result in it becoming the most dominant building within the station complex. In our view, the proposed hotel building is generic in form, rather than responsive to existing site conditions and the heritage of the site, failing to reach a standard of excellence appropriate for this landmark site. It would be our preference for the height of the building to be reduced, and for plantings along the Lydiard Street edge to screen views from Lydiard Street.

Goods Shed

With respect to the Goods Shed, we submit that the use of the Goods Shed for a convention centre with retail tenancies would result in unacceptable heritage impacts. The proposed use is also a departure from what was envisaged in the *Ballarat Station Precinct Master Plan, 2014* (the Master Plan), which did not include a provision for retail tenancies.

Of particular concern is the proposed internal partitioning of the building to accommodate the dual use for a “convention centre” and retail tenancies. This proposal is not supported, and would appear to prevent an appreciation of the internal volume of the Goods Shed. This is addressed in the Conservation Management Plan, which states:

- *A substantial part of the interior should be retained as a large space and open volume, with the internal structure (roof trusses, posts and beams) and side walls exposed.*
- *An internal vista which reflects or emphasises the length of the Goods Shed should be maintained.*

A more acceptable heritage outcome would be to substantially retain the full internal volume of at least part of the building, so that internal views along the east–west axis are retained, providing an appreciation of the size of the building and its historic functions. We strongly disagree with the assessment in the Heritage Impact Statement that “a large volume [is] maintained in the western half of the building”², given the number of internal partitions proposed for this part of the building. The volume of the theatre is further diminished by the presence of raked seating.

¹ Heritage Impacts Statement for Proposed Redevelopment, Lovell Chen Architects & Heritage Consultants, July 2017, p28.

² Heritage Impacts Statement for Proposed Redevelopment, Lovell Chen Architects & Heritage Consultants, July 2017, p 25.

We further object to the replacement of the roof sheeting with galvanised steel. We submit that Heritage Victoria should require the roof to be reclad in slate, as recommended in the Conservation Management Plan.

In our view, the plans for this building should be revised significantly to achieve a more acceptable heritage outcome. Helpful guidelines for adaptive re-use can be found in the issues paper Adaptive Re-use of Industrial Heritage: Opportunities and Challenges, published in 2013 by the Heritage Council of Victoria. This paper emphasises that the “new use should support the ongoing interpretation and understanding of that heritage while also accommodating new functions” (page 4). Also discussed is the important of maintaining spatial structures and configurations, as well as “traces of activities and processes” (page 4).

In determining what an appropriate re-use is, the guidelines state that “The new use, and the level of change required to accommodate that use, needs to be compatible with and appropriate to the heritage significance of the place...” We submit that the use as envisaged in the application is not appropriate to the heritage significance of the place, given the level of change required, and should be reviewed. Carriageworks, located at the Former Eveleigh Carriage Workshops in New South Wales offers a successful solution to adaptive re-use that retains the spatial qualities, structure and experience of the original building.

Public Plaza

While interpretive elements are included in the proposal for the Public Plaza, no Interpretation Strategy has been provided as part of this application. It is therefore unclear how the proposed interpretive elements, such as the “innovative” striped treatment proposed for the public plaza relate to an overall strategy for the site. A holistic Interpretation Plan for the entirety of the Railway Complex should be undertaken by a qualified expert to inform landscape planning for the site. This should be included as a condition of any permit issued. We note for instance that no provision for interpretive signage. Interpretation should be integrated into wayfinding, landscaping, lighting, and street furniture according to an approved strategy, not in an ad hoc way.

The remnants of the former weighbridge embedded in the bitumen of the existing carpark to the north of the train station should also be incorporated into the public plaza if possible (see Figure 1).



Figure 1: Remains of former weighbridge.

Car Park

We generally support the location and envelope of the proposed car park, however care should be taken to ensure that the detailed design and materials are site responsive and that the building is visually recessive.

Reasonable or Economic Use

In making a determination, we understand that under Section 73 of the Heritage Act 1995, the Executive Director of Heritage Victoria has to consider:

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

the extent to which the application, if refused, would affect the reasonable or economic use of the registered place or registered object, or cause undue financial hardship to the owner in relation to that place or object.

However, we note that no documentation has been provided with the application outlining the business case for the redevelopment, or to indicate what feasibility studies have been undertaken, and whether there are available options for the redevelopment which would have fewer heritage impacts on the site. We therefore submit that the Executive Director should **only** have regard to the extent to which the application would affect the cultural heritage significance of the place.

Conclusion

While the Trust is supportive of the activation of the Ballarat Railway Precinct and the adaptive re-use of the former Goods Shed, we object to the proposal in its current form. Broadly, we are concerned that the proposed use and adaptation of the Goods Shed is inappropriate and will result in unacceptable heritage impacts; and that the proposed new development does not adequately respond to the site's context. We are also concerned that the proposal would result in the erasure of significant layers of the site's history.

We appreciate the opportunity to respond to the permit application. Please don't hesitate to contact me on 03 9656 9802 or at felicity.watson@nattrust.com.au.



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