



Guarding the Heart and Soul of St Kilda
PO Box 1099, St Kilda, 3182

**A submission by The Esplanade Alliance
to the City of Port Phillip**

PROPOSED AMENDMENT L68 TO PORT PHILLIP PLANNING SCHEME

The Esplanade Hotel site
11 The Upper Esplanade and 6 Victoria Street, St Kilda

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wind distortions, and poor traffic engineering, which the Alliance highlights later in this submission.

We turn now to particular features of Becton's concept plan and the way they sit with the urban character of the area.

The Bottleshop component – This appears to provide an appropriately sized companion building beside the Esplanade Hotel proper. Our major concern, which needs to be addressed by Council, is that if it comes too far forward it will obscure the view of the upper part of the existing Hotel façade and west wing facade as you travel around the Upper Esplanade from the south.

Baymor Court and stables – A major objection is the proposal to demolish Baymor Court, especially as there is no specific design proposal to go in its place. The hard edge little "village" streetscape that Baymor Court sets up along Victoria Street is very precious. The token offer of open space on the corner, and the looming tower half way down, shows that Becton does not understand this street, and the centrality of the rear Hotel buildings, at all. The low scale residences proposed along Pollington Street appear have the appropriate scale and the right intent. However they will not achieve their desired neighbourly street interface because they are perched too high up on top of a one to two storey car parking podium. They are also intended to screen the towers from the street level at the back, which is really quite impossible.

The mid-height tower – Some of the best aspects of Becton's proposal are at the base of this feature. At ground level there is a large internal service area where trucks can come in and service the hotel and the apartment towers, so all the noise and bins and things are away from the residential streets. On the floor above a large art gallery space is proposed that will link in with artists' studios and facilities on the upstairs floors of the Hotel. But the current kitchen block will be demolished, which is unfortunate. The sheer size of this tower envelope is problematical given that it actually overhangs the current Gershwin Room wing. This is not how Becton's artist's impressions of the building represent this part of the development at all. It is actually considerably wider than any of the artist's images that have been on display.

The Esplanade Hotel – Becton has undertaken to retain most of the building, and, as far as they can assure us, the actual musical and social culture of the Espy too. A major problem is that because this is just a generic envelope development proposal, none of this has been remotely guaranteed.

The success of all these features depends on clever, insightful, sensitive architecture. Becton might provide this in the end, but, as its application does not commit to any specific architectural design at all, there is no guarantee whatsoever that the site will not end up with something completely ham-fisted and dreadful.

2.4 Urban character and the proposed towers

One major argument from Becton is the 'super slim' shape of its main tower, that it is going to be slender in relation to its enormous height. But the plans show that it is going to be enormously wide too. At its slenderest cross-section the main tower is still about as wide as the width of Arrandale. Its length is about twice as long as Arrandale is wide. Right next to it, the 'smaller' tower is as wide as the Arrandale tower again, and as deep too. This is an absolutely vast footprint, planted almost street to street across the entire site. (The overall tower envelope is 45m x 45m, compared to Arrandale's relatively puny 24m x 16m). There is no way the Becton towers can be called 'slim'.

The towers component is completely wrong. It doesn't matter how brilliantly designed it is as a great looking skyscraper. It is the wrong size, in the wrong place, and it will have all the wrong effects. Interestingly, Nonda Katsalidis has designed an almost identical residential skyscraper – the Republic Tower – in Melbourne's La Trobe Street, which is a brilliant piece of architecture for the CAD but not for the Upper Esplanade. Arguments about architectural quality of the design are irrelevant at this stage. It is a matter of where towers are to be located. Let's look at the problems of the principal tower.

3. Local amenity

3.1 Overshadowing.

Becton argues that there are all sorts of clever things about the tower design that "minimize" overshadowing. (One prominent advocate has even suggested that we should be grateful for the shade it will provide.) But the fact remains that the tower will cast vast shadows over a wide swathe of open public space and private houses in the area.

There is some argument that for very nearby residents, a tall tower will cause less overshadowing than a broad slab six-storey block would. But the towers are so broad anyway, and the wider effects so far reaching, that the argument has little relevance.

The cumulative effect of existing shadows and the shadows that would be caused by the proposed Becton tower would be to cast a relatively continuous set of shadows across Alfred Square for nearly all of the winter months. This is a completely unacceptable outcome that must be avoided. The towers will also cast shadows in winter that will move slowly across the foreshore proper from close to the St Kilda pier to the southern edge of the Sea Baths envelope. At times, the shadows caused by the towers will extend out across the water to a length equivalent to about a quarter of the St Kilda pier. A key planning principle must be to ensure that public open space is not impinged upon in this way merely to maximise individual private gain. A superior community benefit must arise in order to justify such a planning approval, and that benefit is not evident in this proposal.

3.2 Overlooking and loss of privacy

The effect of having more spectators to the foreshore scene needs to be carefully assessed. The effect on the immediate residential areas is likely to be substantial – a never-ending wall of ever-present eyes peering into backyards and the scenes of everyday life. For residents of Victoria and Pollington Streets, half the sky will virtually be obliterated.

3.3 Wind effects

Pollington Street, between Arrandale and the Hotel, is already an almighty wind tunnel. The effects in Pollington and Victoria Streets will be multiplied beyond imagination. But this application for a tower envelope doesn't require any wind testing data to be provided. Only when the actual details of the approved tower come up for consideration will Becton have to start thinking about the wind problem, which will be too late.

3.4 Traffic

Just by the sheer number of its occupants, the tower will generate a lot more traffic. And there are also visitors and service vehicles to add in. Becton's traffic engineering report shows that traffic volumes will just about double in the side streets during morning and evening peak hours. But they do not appear to have made any study of the tower's

impact on the weekends – which, of course, is when St Kilda's major traffic congestion begins.

3.5 Parking

Becton has not disclosed exactly how many apartment units will be built in the tower. Their traffic engineers assume 100 to 150 in their report. Add up the floor areas and you can come to well over 200. Provision for on-site parking for residents will possibly be quite adequate. For guests and patrons, Becton intends to contribute to an expanded parking facility on the 'triangle' site down by the Palais Theatre. This may relieve parking pressure overall, but the fact remains that with 100 or more apartments full of new residents, a local parking spot will become an extremely rare commodity.

The effect on local amenity will be substantial, and overwhelmingly negative. Clearly, it will significantly reduce the quality of life for hundreds of residents in the immediate vicinity. Technically, in later rounds of the planning process, amenity criteria may reduce the size of the tower that eventually fills the envelope. But in the later rounds there will be no provision for public consultation. The proposal is clearly a case of over-development of the site, and the likely effects are already obvious. They must be addressed now.

4. Social impact

The physical scale of the building has been the chief focus for attention, but what about the economic and social impacts? Where do these considerations enter the planning equation? Just as Becton's proposal will impact on traffic, and on the future ambitions developments for the foreshore, it will also impact on the housing affordability of central St Kilda, the future of the local shopping districts, and the demand for services from both Council and from the private sector.

In 1976, the Town Clerk of St Kilda gave this response to residents protesting about the Arrandale development:

in the conduct of planning investigations social factors have an important aspect in determining the appropriate policy for any area. In the future these will be investigated more comprehensively, the results being embodied in any planning policy in such a manner as to clearly indicate that they have been considered with as much seriousness

as the physical aspects.

Council should undertake a detailed social and economic study before proceeding any further with the amendment .

5. Planning processes and the existing planning framework

Becton claims that this proposal will not represent a precedent for further high rise development - but no developer can guarantee this. It is utterly misleading of Becton to argue that 17 and 38 storeys on the Esplanade Hotel site won't be replicated elsewhere. A precedent can only be prevented by a proper planning framework, and as the SJB report notes, the existing controls are valid only until 31 December. Indeed Becton's policy justification for the proposal specifically argues: 'the purposeful removal of mandatory development controls, in this case, building set back and height controls, is an approach which is integral to the intent and strategic direction of new planning schemes.' Becton wants the loosest possible regulatory framework within which to capitalise its investment and so it opposes height controls for the site, and opposes the inclusion of height controls per se in the planning scheme. Yet publicly it appears to advocate firm controls for the rest of St Kilda and Port Phillip. Council should reject the double standard being promoting by Becton.

The current requirement on the City of Port Phillip to review its development controls has led to a report that forms part of Amendment C5, currently on exhibition. This report recommends the retention of the 18 metre height limit on the Esplanade Hotel site. The Esplanade Alliance maintains that it is absurd that a single development application such as this one should precede, or in any way influence, the considered strategic application of controls for the entire area.

In particular, the Alliance argues that planning should not be driven by principles derived from Becton's in-house panel and design competition. This is clear privatisation of planning, where the principles are established by the advocates for a private development rather than by an independent, impartial public body. The current statutory process of review of development controls and subsequent amendment of the new planning scheme should be allowed to continue to its completion before any further amendment is entertained. Approving a major precedent-setting, custom-designed amendment to the Port Phillip Planning Scheme when the ink on the scheme is not even

dry, would not be good planning practice. The precedent that would be created if the amendment is approved would set the scene for a serious weakening of the remaining unique qualities of this important boulevard. Becton's plan cannot be considered in isolation from its impact on future development in the precinct.

In any event, Amendment L68 must be considered in light of the existing planning framework. Any applicant who wishes to exceed the existing controls must have a strong case for why they should be allowed to do so. We believe that well reasoned exceptions to rules should always be possible, but the reasons have to be good. The strongest case that Becton has is that it owns the site; secondly, that the site is special and that no other site along the Esplanade should receive the same treatment. We have already argued that the case for lifting the controls on this site only is spurious. In addition, the potential here for precedent must be carefully considered. The onus should always be on the applicant to show why the controls should be waived in their favour.

Becton is asking for this amendment on the strength of its concept plan. If the amendment is allowed, control will be handed over almost entirely to Becton. If there is another property market slump, which is not at all inconceivable, or Becton's finances dry up for other reasons, we could end up with an entirely different, non-Nonda Katsalidis-designed structure. This scenario has the potential to take us only too closely to the Seabaths debacle. It is not inconceivable that Becton could decide to sell the site on, with the approved amendment, which would bring a tidy profit to Becton and leave the St Kilda community holding a potential monster. What Becton is really asking for is a blank cheque, on a promise that it will be spent wisely.

Further, the amendment, if allowed, removes all further opportunity for statutory public comment. The element of the proposed Development Plan Overlay that ensures no further public notice of the plans, right to object, or possibility for appeal is particularly objectionable.

Conclusion

Becton has tried in many ways, some token, and some real, to come up with a sensitive and enlightened development. This we would of course welcome, but the skyscraper concept completely disqualifies it from serious consideration. The fact that Becton's application offers an architect's design only as a concept option, with no commitment,

and no basis for specific assessment, makes the whole proposal totally, emphatically unacceptable.

The real significance of this application is that it not only challenges the planning parameters for this site, but over time it will change entirely how we perceive the foreshore, and how this community plans for this city. This is a battle about whether residents and local government will determine the parameters for reasonable development, or whether our rights and responsibilities are to be surrendered to the interests of a powerful individual developer. The Esplanade Alliance strongly urges the Council to seriously consider abandoning this amendment application.

PROPOSED AMENDMENT L68 TO PORT PHILLIP PLANNING SCHEME

affecting land at 11 The Upper Esplanade and 6 Victoria Street, St Kilda;

The Esplanade Hotel site

Submission to the City of Port Phillip from the Esplanade Alliance Inc.

The Esplanade Alliance, an incorporated community organisation, was formed by St. Kilda residents, traders, musicians and artists nearly one year ago, and is dedicated to preserving the best elements of the St. Kilda foreshore and its neighbouring environment. Hundreds of people have contributed to the Alliance. We played a leading role in the improved design outcome achieved for the St Kilda Sea Baths, and we are deeply concerned about Becton's plans for the Esplanade Hotel.

Introduction

We support the Becton Corporation's plans to retain the current operations of the Esplanade Hotel - its music, comedy, poetry, recording studio, kitchen, and unique role in local, national and international sub-cultures. *

The Esplanade Alliance's principal concerns about the proposed amendment relate to

- ◆ the Concept Development Plan
- ◆ the removal of significant heritage and conservation controls on the site
- ◆ the building envelope
- ◆ elements of the Development Plan Overlay

Our submission is organised around five key issues raised by the application:

- ◆ **The 'landmark' concept**
- ◆ **Heritage and urban character**
- ◆ **Local amenity**
- ◆ **Social character**
- ◆ **The planning process**

First, it is timely to place the application in its recent planning context. Controversy has

* see the Espy website at <http://www.ozemail.com.au/~espy> for an indication of the pub's worldwide following, and Appendix 1

surrounded nearly every major development on the Upper Esplanade in recent years, commencing with the Arrandale tower in 1976; the Novotel development in the mid-1980s; Evidon's 18 storey proposal for the Esplanade Hotel in 1987; and now it is Becton's 38-storey tower plan.

Each of these proposals has met with extraordinary community interest, indicating the central place this area holds in the public imagination of St Kilda. The arguments from the planning battles of those times are resounding again too, with the proponent of this amendment arguing that the area lacks architectural consistency, and that the diversity of the existing environment should allow a new building of this bulk and height. But the planning mistakes from an earlier era, such as the development of the Arrandale tower, must not be used as benchmarks for subsequent planning decisions. If unfortunate precedents from the past are used to inform and justify the analysis of the current application, there is a great danger that the Esplanade streetscape will eventually be totally corrupted.

1. The 'landmark' concept

Becton has mounted several arguments in support of its contention that the site needs a distinctive landmark.

The key document in support of this application, the SJB report, **Planning and Design Parameters of the Esplanade Hotel Site St Kilda**, says the Esplanade Hotel site should have 'a residential tower with a landmark/ beacon/lighthouse character to re-establish the site's prominence within St Kilda'. It argues for 'a noteworthy building on the city's most noteworthy site'.

What basis is there for arguing that the existing controls should be lifted on only the Esplanade Hotel site? The SJB report suggests that sight lines, from St Kilda pier, the Bay and other points along the foreshore should determine the optimum building envelope for the site. A major leap of logic is made: ' . . . the site occupies a promontory, or point, where significant views from surrounding locations converge. This characteristic allows it to sustain taller building elements than other sites in the locality. It will also reduce the current prominence of the Arrandale and Bayview buildings . . . new development should

be composed to promote the site's landmark status while still respecting its relationship with surrounding streets.'

What exactly is proposed - a lighthouse, a beacon, or a landmark – as these are all potentially quite different things. None of these objectives lead to the conclusion that a skyscraper should be built on the site: Melbourne has many landmarks that are not towers, as Becton demonstrates in its promotional video (eg. which focuses on the National Gallery of Victoria, the Shrine of Remembrance, and so on). The site can sustain new, notable, imaginative and excellently designed buildings that could become landmarks, lighthouses and beacons in Melbourne, without breaching the current height controls.

The site is noteworthy because of the existing Esplanade Hotel, not its particular geography. The Hotel's axial alignment with the pier, which Becton uses as a distinguishing feature of the site, has an impact only if you are out on the end of the pier. This alignment is not particularly significant if you are travelling along the Upper Esplanade, which is the most common experience of the site. The site is not the highest point on the Upper Esplanade, in fact the buildings around Alfred Square are. The most prominent site in this quarter is the old St Moritz (Novotel) site. If Becton owned Novotel, or any of the buildings around Alfred Square, it would most likely run the same argument, that the controls should be lifted 'only on those sites'.

The report describes the site as forming an important node of intersecting visual links from as far away as the Mornington Peninsula and the Melbourne Central Activities District (figure 3). It is also asserted that from a central point in Hobson's Bay the site can be construed as forming one part of a so-called 'bookend', the other 'end' being the Mirvac/NFK/Becton developments in Port Melbourne (figure 6). Council should reject such fanciful and completely arbitrary notions; they have no planning validity. Not only are the visual links an exaggeration, they are only possible from a high rise tower in the CAD, or a hot air balloon rising over the Peninsula, or from a yacht sailing on the Bay. These transitory experiences should not be the basis to inform and cause such a critical change to the landscape of St Kilda.

There is no intrinsic connection between sight lines and the logic of developing a skyscraper tower; this has certainly not been a feature of Australian CBD planning and indeed the idea of geographical prominence has often deterred skyscraper erections (eg.

the Flagstaff Hill precinct in Melbourne). If the towers are intended as a gesture to somehow compensate or mask Arrandale and Bayview, this is highly contentious. Planning for the site should respond to the totality of the environment, not planning mistakes that are manipulated to justify a priori views about height and capital return.

The fact is that the site is in a predominantly low-rise precinct. Its key relationships are to Marli Place on the Upper Esplanade, the Victorian and Edwardian terraces and villas of Pollington and Victoria Streets, and to a lesser extent, the low-rise buildings directly on the foreshore. If any site in the precinct is engulfed by towers it will radically devalue the overall heritage character of the related buildings.

The idea of the landmark in this case appears to be a moveable feast, as the original Nonda Katsalidis design proposed a tower of about 24 storeys. Somehow this has been vamped up in this amendment application. Becton's credibility is in serious question as a result. Many of its arguments appear to have been concocted in order simply to achieve greater height and thus maximise the company's potential capital gain.

The proponent has argued elsewhere (Herald-Sun, 16/11/98) that a tower is 'necessary to ensure the future of the much loved hotel at its base. We want to save the Espy by giving it a commercial as well as a cultural future, and we need height to do that'. This contrasts with recent development experience in the inner city and St Kilda in particular. It especially contrasts with the successful refurbishment of the George and Prince of Wales Hotels, places with similar histories facing similar heritage and viability issues, without high-rise towers. Towers were not necessary to restore their commercial success, nor has the genuine landmark status of either been diminished as a consequence. Both hotel renovations reflect a love of their character and past, a commitment to imaginative design, and a clear understanding of the landscape and context within which the buildings are located.

Council needs to clarify whether the main purpose of the Becton towers actually is to create a 'landmark', to subsidise continued operation of the Espy, or to ensure a substantial capital gain to the proponent of the application. Given the paucity of argument and contradictions presented by the proponent, there may be something of an ambit claim for the height and development parameters contained in the application. It does not advance proper planning in this city to see a respected developer potentially abuse the

planning process in this way. Local and State planning authorities should condemn such practice.

2. Heritage and urban character

Becton says it is concerned about the heritage values on the site. If this is the case we need to query why it opposed the site's listing on the Historic Building Register, but especially why it has submitted an application that has few provisions to protect the remaining post-redevelopment historic fabric of the hotel. It has sought to demolish most of the site including features of local and regional significance without offering any justification other than the necessity of having a cleared site. Becton's lack of regard for the site's history and framing is integral to the consideration of this proposal. A prime example is its treatment of Baymor Court.

2.1 Baymor Court

Baymor Court, the Spanish Mission style flats at 6 Victoria Street, was a local and metropolitan landmark in the 1920s and is deeply reflective of the aspirations of the time to cultivate a Moorish/Mediterranean sensibility. It is to be replaced by a basement carpark for a new form of global architecture.

In 1988, noted local architect Allan Powell wrote to Council saying:

Baymor Court has a town streetscape while evoking the seaside. It has an urbanity that essentialises St Kilda's traditional atmosphere. As an architect, I cannot think of a better design solution. The standard of the building is in the best Melbourne domestic tradition . . .this clever building could be a valuable asset to imaginative and sensitive consultants wishing to develop the remainder of the site.

The Becton application seeks to have local heritage protection removed from these historic apartments. The debate on Baymor Court's preservation is complicated but, at the bottom line, it is absolutely unacceptable that a developer should apply for the demolition of a heritage listed building without having submitted any actual design proposal for its replacement. That in itself should be enough for Council to reject this application.

2.2 The Esplanade Hotel

Retention of the building, at least in its physical appearance from the street, is a cornerstone of the development proposal and Becton should be applauded for it (and, if any development is allowed, held to it).

But the proposal calls for the demolition of the hotel's original rear service wing, where the current Espy Kitchen is, and this should not be contemplated without a proper heritage assessment. Again, what is going to replace it should be made fully explicit, and be fully committed to. Vague and generic development applications must not be allowed to sweep away uniquely important parts of our heritage.

Heritage protection, also, is not just about preserving the physical building itself. It just as importantly ensures that the building retains its proper place, and prominence, and relationship within its setting.

2.3 Urban character

The essence of the Esplanade Hotel's significance is its prominent, landmark, icon status on the St Kilda foreshore Esplanade. The proposed tower will completely dwarf and overwhelm it. The Espy is like a great keystone in St Kilda's historic foreshore frontage, but the tower will just reduce it to a trivial curiosity at its foot. Becton seeks to trade on the Espy's landmark status at one moment, and then treat it so dismissively when it comes to the bigger picture. If local heritage protection for vulnerable key sites is to be taken seriously, the Becton development must be brought under control.

Heritage controls currently mandate that any development immediately next to a high-grade heritage building should not be allowed to be built any higher than the existing heritage building. This is one of the principles behind the current height control on the site of 18 metres – essentially the height of the top of the Espy's chimneys. Every metre above that mark should have to be argued for. That's the starting point, not 38 storeys.

The architecture of St Kilda's Esplanade is diverse and eclectic. All sorts of different architectural styles and different types of buildings jostle each other side by side. It is a wonderful, sometimes wacky mix, and it is what people come to visit and live in St Kilda for. The architectural variety reflects St Kilda's social diversity, with all sorts of people and sub-cultures and commercial and entertainment interests rubbing shoulders in a spirit of appreciative co-existence.

The huge size of the Becton tower introduces a completely different force into the picture: a force of singular dominance, both visually and socially. This huge 'landmark' will reduce the central visual and architectural image of the St Kilda foreshore to just one thing. When you look at St Kilda; when you think of St Kilda, there will be just one image – the Becton tower. The rest will become purely incidental. It will also communicate in a powerful and grand way that the trend line in St Kilda is fast moving away from celebrating social diversity to the development of exclusive residential spaces radically divorced from the local environment, neighbourhood context, and from the area's cultural history. In effect it will help dissolve, quite dramatically, the very urban character that it is trying to buy into.

Becton argues that St Kilda is all about being bold and different. Perhaps, but this sense of difference works within a truly pluralistic fabric; bold and different and totally dominant will not work. Building the first CAD style tower on an Australian beachfront (apart from the towers that press skywards on the Queensland Gold Coast) is bold and different, but entirely inappropriate. It is a complete misreading of St Kilda's culture and spirit.

The spirit of co-existence in St Kilda might accommodate a new exclusive subculture living within it, but not one of such overbearing prominence. Co-existence should allow a new architectural neighbour to add a new element of architectural excellence to the Upper Esplanade, one that even outshines its less distinguished neighbouring buildings. But it should not be one that so dominates the whole scene. Becton has not sought to create an architecture or design on a human scale, one intimately related to its neighbours and its context. It is seeking to create a 'lighthouse' intended to narcissistically draw attention to itself, and simultaneously reduce St Kilda, its character, its people, and its history to a mere prop at its feet. The building envelope being sought by Becton might be acceptable on an undistinguished site. But St Kilda is already a locale of national prominence. Its qualities must be reinforced, not displaced by a poorly conceived gimmick such as Becton proposes.

The SJB Design Parameters report argues that 'the Hotel site and, indeed, many other sites in and around the St Kilda foreshore, has a role to play in revitalising an area which has long failed to realise its full potential'. The Concept Development Plan is represented as the flagship for St Kilda's revitalisation. What is the justification for this?

This argument is at least a decade out of date. The foreshore continues to be one of Melbourne's major attractions in terms of both internal and external tourism. The Sea Baths are about to be refurbished, Luna Park is being revived, Donovans has been stylishly renovated, Kirby's is featured on the cover of the Melbourne phone book, international regattas are being held in the St Kilda Harbour, and the Palais continues to draw major national and international artists. Rather than add to the appeal of the area, intensive exploitation of the foreshore in the manner suggested by Becton will not only place further pressure on fragile infrastructure (such as transport systems), and threaten existing environmental qualities, but also may actually kill the goose that laid the golden egg.

Catani's vision of the St Kilda foreshore has sustained the area for close on one hundred years. It is a vision that has enduring appeal, and it should not be laid aside just to maximise a temporary financial gain. The more we live off this history without replenishing it, without giving it an added **public** dimension, the more in fact we deplete our future.

The original St Kilda vision was grounded in a superb human aesthetic and scale, one that encouraged human interaction (eg. promenading), explored our fantasies and fears (eg. Luna Park), refreshed our bodies (eg. beach reclamation) and renewed our souls through music and performance (eg. the Palais). As the cultural history of the Esplanade Hotel produced by the Esplanade Alliance shows, the hotel is in this great tradition.

The towers will literally overshadow this vision, and replace these essentially communitarian values with something driven solely by ego and individual gain. The proponent argues the continued operation of the hotel as a music venue, and the addition of facilities for the visual arts and broadcasting represent a considerable community gain resulting from the proposal. To be sure these are worthy outcomes, but they arise squarely from the commercial opportunities presented by the Hotel's current landmark status in the development and nurturing of Australian music and comedy. When Becton bought the site it also bought the right to further exploit this commercial opportunity. It did not buy the right to trade the Hotel's pivotal role in Melbourne's artistic and cultural life in return for the development of high-rise towers. As we have noted, the towers represent a considerable cultural and community cost. And there is a profound physical dimension to this trade-off, with irredeemable long term impacts such as massive shadowing, ugly