



**Australian
Institute of
Architects**

ABN 72 000 023 012
The Royal Australian Institute of Architects
trading as Australian Institute of Architects

Tusculum
3 Manning Street
Potts Point, NSW 2011

P: +61 2 9246 4055
nsw@architecture.com.au
Architecture.com.au

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Ken Gouldthorp
General Manager
North Sydney Council
PO Box 12
NORTH SYDNEY
NSW 2059

Via email: council@northsydney.nsw.gov.au

Dear Sir

**Re : DA 147/20
105-153 Miller Street, North Sydney
Demolition and Redevelopment of MLC North Sydney**

The Heritage Committee of the NSW Chapter of the Australian Institute of Architects (the Institute) has reviewed the submission by Bates Smart and the associated heritage report. The proposed demolition of an important and significant North Sydney landmark is of great concern to us, as is the adequacy of the Statement of Heritage Impact that has been prepared.

The MLC North Sydney is currently listed as a local heritage item on the North Sydney LEP 2013, item number I0893, and is one of the few remaining NSW buildings in the post-war international style.

The building is also listed on the Institute's Register of the Significant Architecture in NSW (listing number 4703034), the Institute's listing of National Significant 20th Century Architecture and DOCOMOMO Australia NSW Register. These listings confirm the building is of national importance in the development of Modernism in Australia.

We confirm the building is of architectural significance to the state of New South Wales, and possibly of National significance for the following reasons:

- It is important in the course of NSW's cultural history and is seminal in the development of high-rise buildings in Australia.
- The building used construction and detailing techniques not previously seen in Australia – use of curtain wall and first use of modular units.
- It was the tallest building in North Sydney and a landmark for a very long time, beginning the transformation of North Sydney from low scale to high rise CBD.
- The Building is associated with Bates Smart McCutcheon, who were influential in the design of high rise in Australia. The design is attributed to Sir Walter Osborne McCutcheon who was awarded the Australian Institute of Architects' Gold Medal in 1965 and was knighted in 1966.
- It demonstrates aesthetic characteristics and a high degree of creative and technical achievement through the first US influenced Post-War International Style modern commercial high-rise.
- The building is one of the earliest of its type and one of the few to survive.

Not only is the building an early Sydney example of the Post-War International Style, detailed for commercial office uses, it is also possibly the earliest surviving curtain wall building in Australia. The importance of this building as an exemplar of the style is confirmed by its inclusion in Richard Apperly,

Robert Irving and Peter Reynold's book *A Guide to Identifying Australian Architecture*. One of the closest comparable buildings in Australia, also by Bates Smart McCutcheon, is the ICI House in Melbourne, which is listed on Victoria's State Heritage Register (VHR number H0786).

The Statement of Heritage Impact, prepared for the MLC Building by RPS Group (dated 28 November 2019), has several profound shortcomings that void it as an objective report. These are summarised as follows:

- It does not follow the Heritage NSW guidelines for the preparation of Statements of Heritage Impact.
- It does not undertake any assessment of cultural significance or comparative significance.
- It does not adequately assess the heritage impact for each listed refurbishment option.
- It makes no reference to the policies contained in the Conservation Plan prepared for the MLC building by Jackson Teece Chesterman Willis (May 1998).
- The issues listed as reasons for full demolition are not properly examined, including, for example, an assessment on the viability of refurbishment along with the importance of the building's contribution to the public domain of North Sydney.

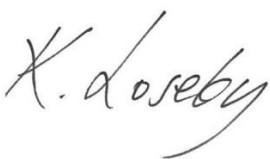
We strongly believe that demolition of this building is not warranted and would constitute an irretrievable loss to North Sydney, if not NSW. We believe that adaption could be undertaken and any heritage impact mitigated through new interventions that retain the building and its recognised heritage significance.

We recommend that North Sydney Council undertake an independent assessment to reconfirm the building's heritage significance, especially against the seven criteria of heritage significance identified by Heritage NSW. We also believe this assessment should include a comparative analysis with similar Post-War International Style buildings and curtain wall buildings of this era.

As and when required, the Heritage Committee of the Institute's NSW Chapter can assist and provide additional information during any reassessment process. We are also available to help in any discussions on the future reuse and adaptation of this exceptionally significant building.

The Institute looks forward to continuing to work constructively with North Sydney Council on this important issue.

Yours faithfully



Kathlyn Loseby
President NSW Chapter
Australian Institute of Architects