

# **Attachment B3**

**Summary of Submissions –  
Former Sydney County Council Building**

Summary of submissions  
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No.	Submitter <sup>1</sup>	Submission summary	Submission response
C	Former Sydney County Council Building, 552A-570 George Street, Sydney		
C1	Extent for landowner	<b>Oppose.</b> For the reasons outlined below.	Objection noted and issues responded to below. This assessment prepared for the landowner was exhibited with the proposal.
C1	Extent for landowner	<u>Evidence</u> The revised study (March 2019) undertaken by TKD Architects does not provide sufficient evidence to demonstrate that the building is worthy of heritage listing at a local level. Based on the research and investigation undertaken to date, the study and assertion of local significance is tenuous, the proposed listing is contested and should be rejected.	<u>Evidence</u> The listing is based on the recommendation of an independent heritage study of the Modern Movement in central Sydney and an individual heritage assessment of this building, prepared in accordance with the Heritage Council criteria and supporting Heritage Office guide. The study is informed by a state-wide thematic history of this movement. The study identifies this building as worthy of local listing as an example of local heritage significance. Further City review before exhibition supported this study recommendation. The study concludes the former Sydney County Council Building fulfils five Heritage Council criteria for local listing for historic, associations, aesthetic/ technical, rarity and representative value. The former Sydney County Council Building is assessed as significant as a fine example of the Late Twentieth Century International Style office, distinguished by its building form and dark toned exterior that are unusual for central Sydney. It is significant for its positive streetscape contribution and demonstrating the work of prominent architects Fowell Mansfield & Maclurcan. It represents potentially the only commercial post-war building in central Sydney resulting from an architectural competition, and the purpose-built headquarters of Sydney's electricity supplier.

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<sup>1</sup> Submitters are named with permission from the submitter

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C1	Extent for landowner	<p><u>Competition historic and rarity significance</u></p> <p>The use of an architectural design competition is not in itself significant, as other design competitions were held for more prominent buildings in Sydney at the time, such as the Sydney Opera House in 1955, Melbourne's Flinders Street Station in 1899 competition, the war memorials of Melbourne Sydney and Brisbane from 1922-29, Canberra plan in 1912 and other examples outside of Sydney. The first building designed by competition in Paris was Centre Pompidou in 1971. It is of little relevance to significance and narrow to state that this building "is understood to have been the only commercial office building to have been the subject of an architectural competition commissioned by the Sydney County Council during the post war period in Central Sydney" in the Statement of Significance. The use of a design competition may reflect a lack of access to the City Architect or requisite skills within the organisation for high-rise buildings. There is no definitive history or research of Australian architectural design competitions to verify this was the only such design competition.</p> <p>There is no evidence this competition established a trend for Sydney County Council or for civic buildings in the city. Competitions were not used for the following large Sydney County Council buildings, including the 1975 Roden Cutler House. Later high-rise civic buildings were designed a mix of public and private architects, such as the 1978 McKell Building and the 1977 Town Hall House. The Government Architect's Office designed most civic buildings to the end of the 20th century. It is more unusual this building was not designed by the Government Architect's Office. Design competitions are erratic and controversial in Australia, noting Barangaroo. These do not necessarily result in good design or construction of the design.</p>	<p><u>Competition historic and rarity significance</u></p> <p>The study assesses this building as historically significant and rare as a competition-designed commercial building from the post-war period in central Sydney; understood to be the only such example. The assessment of significance in this inventory does not restrict the building's assessed historical and rarity value to Sydney County Council commissions. The Sydney County Council association is another aspect of its assessed significance under the separate associations criterion. The Statement of Significance has been revised to separate these points for greater clarity, consistent with the assessment in the inventory.</p> <p>The submission, and its noted other examples, does not provide substantive new information to overturn the building's assessed historic significance and rarity at a local level, as evidence of the competitive design process in central Sydney during the post-war period. Of the many noted competitions, this submission does not identify any competition-designed offices in Sydney to dispute the assessed rarity of this building locally. The Opera House and Anzac Memorial are the only Sydney examples noted. Neither are commercial post-war buildings. These are also recognised as world or state significant; a higher level of significance than required for local listing. While noting other examples, the Heritage Office guide states that an item is not to be excluded on the grounds that others with similar characteristics have already been listed, such as other competition-designed buildings.</p> <p>The significance of the subject competition was reported at the time as "one of the most important to be held in Aust for some time". The few competitions in the post-war period adds to the rarity of this example. The constructed building reflects the winning design. As such, this building provides evidence of an early model of the competitive design process, which since 2001, has become an integral part of City of Sydney planning for design excellence, shaping the City of Sydney's skyline and architectural achievements of the 21st century. The merit of the subject design does not affect the building's assessed historic significance or rarity under the Heritage Council criteria and is reviewed separately under aesthetic and representative criteria.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C1	Extent for landowner	<p><u>Sydney County Council associations significance</u>  Sydney County Council was based in several buildings prior to this one. The construction of municipal buildings is a routine exercise of a municipal authority's powers. The design brief from Sydney County Council was for a generic commercial building. There was nothing purpose designed or built for the Sydney County Council, unlike Roden Cutler House that included zone substation as well as office space. The required flexibility of the building has allowed for multiple changes to the building over the years.</p> <p>This was not the first building to house the Sydney County Council, as it first occupied premises next to the Sydney Town Hall and then leased a portion of the Queen Victoria Building. The building was one of many buildings constructed by the City of Sydney and its predecessors "for its own purposes", including its electrical undertaking.</p>	<p><u>Sydney County Council associations significance</u>  The significant association with Sydney County Council is strengthened by the building's purpose-built design for its headquarters, and its long-term occupation and use by this electricity supplier and its subsequent iterations for approximately 50 years during an important period of supplying electricity to Sydney during the second half of the twentieth century. The building design reflects the civic importance of the organisation and function, and incorporates rooms specific to this use, including the retained theatrette originally used for demonstrating new electrical appliances.</p> <p>The building is not comparable to other local council buildings because it was built for Sydney County Council; a separate organisation formed to supply electricity. This building was the first purpose-built headquarters for Sydney County Council following its formation in 1935 to take over electricity supply for Sydney from the local council's electricity department. This headquarters predates the 1970s Roden Cutler House in Haymarket. The submission does not provide any assessment of Roden Cutler House, which is not currently listed and is located outside the study area, for comparison. The submission does not provide substantive new information to overturn the buildings assessed significance for its association with Sydney County Council.</p>
C1	Extent for landowner	<p><u>Architect association significance</u>  The architectural firm of Fowell, Mansfield, Jarvis &amp; Maclurcan is not noted for its high-rise designs, but more for its churches and infrastructure designs. As a practice, the firm did not have a lasting impact upon Australian architecture. It ceased to be a major firm by the late 1970s.</p> <p>In terms of individuals of this practice, the principal architect, Joseph Fowell won the RAIA Gold Medal in 1962, known for designing church buildings, the Gladesville Bridge, UNSW buildings and schools. Neither of the other two partners at the time of the design competition for this building – Mansfield and Maclurcan – appear to have received any architectural awards. Earlier iterations of the firm received the Sulman Medal for St Anne's Church, Bondi (in 1935) and the Orient Line Building (in 1943). Osmond Jarvis joined the firm in 1962. Neither James Kell and Diana Pratt appear to have been notable architects in their own right, as there is little information available regarding their careers, and neither appears to have won any architectural awards. Discusses the design merit of this building for setting standards, trends and uniqueness.</p>	<p><u>Architect association significance</u>  Fowell, Mansfield, Jarvis &amp; Maclurcan is regarded as a prominent architectural firm of the twentieth century. Its range of work, including churches, is acknowledged in the inventory. The awards and work of this firm, noted in this submission, supports the prominence of the firm and its work during the twentieth century. It is acknowledged the Sydney County Council building demonstrates a less common high-rise commercial example of the firm's work. This contributes to and does not diminish its significance. Regarding the project architects, the Docomomo Australia submission notes the importance that these were from the younger generation as "up and coming" architects of the time. Winning this prominent design competition, judged by senior architects, against 61 other local and international architects, is an indicator of their skill. The merit of the design or its uniqueness does not affect the assessed significance of the building for its associations under the Heritage Council criteria. Design merit is assessed under the separate Heritage Council criteria for aesthetic, rarity and representative significance, reviewed separately. The submission does not provide substantive new information to overturn the buildings assessed significance for its association with Fowell, Mansfield, Jarvis &amp; Maclurcan.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C1	Extent for landowner	<p><u>Aesthetic and representative significance</u>  The building is not identified as a significant building by the Australian Institute of Architects, and the building did not win any architectural awards. The electricity agency publications in 1955, 2004 and 2015 make only passing reference to building this building as the head office as a routine matter.</p> <p>The highly prescriptive design brief led to a design lacking innovation or distinction. The form responded to the brief to accommodate public rooms “easily accessible from the street”, and entrance hall, information centre, receiving cashier’s booths, a display showroom and a thetrette for cookery demonstrations. Quotes the study report: "the competition didn't produce a design of exceptional or ground-breaking character but encapsulated mainstream corporate architecture at this point of time...The similar building forms [of the three top rated competition entries] suggest the influence of the competition brief." By TKD’s own assessment, the building was not a notable or innovative design, highly constrained by the design brief, evidenced by the similarity of the top three entries. The architectural competition did not achieve an exceptional or notable outcome, but a mannered, conservative design, in keeping with the organisation for which it was designed.</p> <p>The building is at best an ordinary example of the International style and is not exemplary. Claims it is a fine example of its style are not substantiated. The design did not establish new standards or architectural trends. The 3 principles of International style architecture are not assessed. While it demonstrates one principle of regularity with the repetitive modular form of the curtain wall, curtain wall construction is common.</p>	<p><u>Aesthetic and representative significance</u>  Where all building designs have client requirements and briefs, the difference for this building design is it won a competition against 61 other designs from Australian and international architects. The judges included the Institute of Architect’s president. This indicates design merit. Following the 1960 competition win, it is acknowledged the TKD heritage study is the first formal heritage or architectural recognition for this building. The building is identified in at least one major architectural publication including Jennifer Taylor’s "Tall Buildings, Australian Business Going Up: 1945-1970" (2001). The TKD study assesses this building as a fine example of a Late Twentieth Century International style commercial building in central Sydney, designed by Fowell, Mansfield, Jarvis &amp; Maclurcan, demonstrating characteristics of the style, with a positive streetscape contribution. The study identifies building features unusual for central Sydney at this time including the building's overall form and dark toned exterior, maintained in alterations. Further features identified include the loggia and curtain wall. This satisfies two Heritage Council listing criteria of aesthetic and representative significance at a local level.</p> <p>The study report acknowledges that the design was not ground-breaking or exceptional but reflected mainstream corporate architecture of the time and the competition brief requirements, such as for an open plan and a design imparting civic dignity. This contributes to or does not diminish the building's assessed significance. Docomomo Australia have submitted that this building is exceptional for Sydney at the time for its curtain wall aesthetic, as well as its dark finish identified as uncommon for Australia by Taylor (2001). Other heritage and architect professionals and organisations also made submissions in support of the building’s heritage value. A building does not need to conform to all characteristics of a style, be exemplary or set trends to satisfy the Heritage Council criteria for local significance. A building can also be listed as a fine local example of a style, aesthetic distinctiveness and evidence of significant historic activity; all demonstrated by this building. This submission does not provide substantive new information to overturn the building's assessed local aesthetic and representative significance.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C1	Extent for landowner	<p><u>Other stylistic examples</u>            There is no evidence the architects referenced the seminal Lever House in New York design by Skidmore, Owing and Merrill's. While this New York practice is credited with propagating the Internationalist style with their interest in developing the podium and tower typology, this is not true for this building's architects of Fowell, Mansfield, Jarvis &amp; Maclurcan, better known for churches and infrastructure. The podium with a ground level courtyard was used in Lever House in New York where the "raised ground level allowed for public access and created a plaza for people to walk through and enjoy." This building did not have a courtyard like the Lever House, limiting access to the building.</p> <p>Curtain walls most like this building with concrete spandrels and windows include the Commonwealth Savings Bank and Royal Insurance Group Building, both in Melbourne. Significant examples of curtain include the, ICI or Orica House in Melbourne and Qantas House and AMP building in Sydney.</p> <p>Other podium and tower buildings were built in Sydney in the 1960s and 1970s, noting Australia Square, the UTS tower and the Hilton hotel. Contemporary examples noted include Central Park and 500 George Street.</p>	<p><u>Other stylistic examples</u>            From more than 110 post-war buildings surveyed in central Sydney, the study identifies this building as worthy of local listing. The other noted examples do not affect the assessed significance of this building as a fine example of a Late Twentieth Century International style commercial building in central Sydney, demonstrating characteristics of the style, and unusual features for its time, with a positive streetscape contribution. The building satisfies the Heritage Council listing criteria of aesthetic and representative significance at a local level. Examples noted outside of Sydney or from a different contemporary period do not demonstrate Sydney's local post-war heritage. This building's similarities and differences to New York's Lever House, acknowledged in the study, contribute to and do not diminish its assessed significance as a local Sydney example. The similar building form demonstrates the influence of American architecture, as reflected in the style's name; international. Differences demonstrate Sydney variations, such as the loggia in place of a courtyard and more opaque facade. This building is not assessed as equal to the significance of Lever House for influencing the architectural style nationally or internationally. Outstanding or influential examples, compared to others in a wider NSW, Australian or international context, would meet the criteria for higher levels of listing than proposed as state, national or world heritage.</p> <p>The other noted local curtain wall examples of Qantas House and AMP are listed or nominated as state significant; a higher level of significance than required for local listing. Of the two Sydney examples of post-war tower and podium buildings, only one is currently listed: Australia Square. This has a distinctly different form with separate tower and plaza building. The UTS building is not currently listed or assessed for listing and is located outside of the study area of central Sydney. While noting other examples, the Heritage Office guide states that an item is not to be excluded on the grounds that others with similar characteristics have already been listed, such as other post-war curtain walls or tower and podium buildings. The other examples identified in the submission therefore do not provide substantive new information to overturn the building's assessed aesthetic and representative significance.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C1	Extent for landowner	<p><u>Alterations and facade tone</u> The building fabric externally and internally has been substantially altered and there is very little original fabric remaining. The overall form and scale of the building is the only intact element. Archival research and detailed physical inspection have revealed that there is little original fabric within the building. The external fabric and appearance were fundamentally altered in the 1990s through façade recladding. The form of the loggia/ colonnade remains with replaced stone cladding, stairs and an access ramp added, likely in the 1990s. Attaches a fabric analysis report, showing the level 22 circular chambers ceiling is removed and identifying altered and retained fabric.</p> <p>The current tone of the building façade is based on the 1990s cladding, not the original cladding or design. The dark tones analysis relies on original 1960s rendering and 1968 black and white photo. The 1986 and 1990 photos show a lighter toned exterior. The finishes do not reflect the tonal qualities of concrete and granite to match the original. It greatly altered the original appearance of heavier concrete. The concreted panels were deteriorated with delamination and waterproofing issues. In 1995, PTW noted the recladding of the spandrel was darker to decrease contrast between the mullion and the flat panels. The dark tones are a recent development and does not reflect the original design of the building. It is unknown how much if any of the original facade remains beneath the cladding.</p> <p>The corner location did give the high-rise tower prominence when built. However, it now blends in with taller high-rises around that reduce its contribution to the streetscape.</p>	<p><u>Alterations and facade tone</u> City staff inspected the building interiors with the owners and their consultant and considered the submitted reports. The City inspection confirmed the building retains its original podium and tower form, including roof terrace and open loggia, fenestration pattern and aluminium window frames, and some internal features, with minor, compatible or reversible alterations. Since this submission, it is also confirmed the original facade spandrels and mullions are retained behind the 1990s cladding. Internally, the original theatrette form and some marble wall and floor finishes in ground floor foyers are retained. The office floors retain the open plan grid with structural columns and internal face of the perimeter walls, with some original timber-panelled mullions and under-sill vent panels. The contemporary office fit-outs are not significant.</p> <p>The 1990s recladding and other alterations are acknowledged in the inventory. The inventory notes the original concrete and granite facade materials and includes 1980s colour photos, considered as well as other records. Tonal variations in the colour photos are noted, reflecting differing light conditions when taken and possible print degradation. Although the 1990s cladding is not a direct match to the original, it reflects the original design intent and dark exteriors for the building, as documented in the 1962 rendering and 1968 black and white photo. The cladding can also be replaced with sympathetic finishes, as currently proposed.</p> <p>Development surrounding this corner building does not affect its assessed significance, as the original form, prominence and streetscape contribution of this building can still be reasonably appreciated. Historic photos and other documentary evidence can assist with interpreting its significance, the original design intent and restoration of lost details.</p> <p>The City review confirms the building retains a reasonable level of integrity with some alterations that do not compromise its assessed significance. As a result of this review, it is recommended the proposed item name for the building including "significant interiors" is revised to specify inclusion of "façade walls and fixtures, internal structure, ground floor loggia, theatrette and foyer marble cladding." This excludes non-structural features of the office floors and basement carpark from the listing. The inventory has been updated to reflect this post-exhibition review.</p>



No.	Submitter <sup>1</sup>	Submission summary	Submission response
C1	Extent for landowner	<p><u>Conclusions</u> This report concludes that the building at 552A-570 George Street Sydney does not meet the criteria for local heritage significance and should not be listed on the City of Sydney Local Environmental Plan at any level. The significance of the building under the assessed criteria is not demonstrated, and further analysis has revealed that there are many incorrect assertions about the building, its history, significance and intactness.</p>	<p><u>Conclusions</u> The submitted report and information for the landowners have been considered and the building inspected. Submitted assessments with different conclusions about significance do not make the study incorrect. It makes the study contested. The contested points have been considered against the Heritage Council criteria and supporting Heritage Office guide. The submission does not dispute the building age, style, architect, competition history, use or alterations identified in the study inventory. The submission seeks greater demonstration of the significance of these facts, or a significance comparable to buildings of state or higher significance or unrelated to Sydney's local heritage, than is required by the Heritage Office guide for assessing local heritage significance. If the significance of this example was comparable to other buildings or rare in a wider NSW, Australian or international context, it would meet the criteria for higher levels of listing as state, national or world heritage. The building is assessed as meeting the Heritage Council listing criteria of local heritage significance in accordance with the Heritage Office guide. This is based on an independent heritage study of the Modern Movement in central Sydney, a survey of more than 110 comparable post-war buildings and an individual building assessment. The submission does not present substantive new information to overturn the study assessment that the building satisfies at least one Heritage Council listing criteria of local heritage significance. The assessed local significance of the building under five criteria is supported for its historic, associations, aesthetic/ technical, rarity and representative value. The building therefore warrants listing as a local heritage item. Docomomo Australia and further heritage and architect professionals and organisations support the building's heritage value and listing. As a result of this review, it is recommended the proposed item name for the building including "significant interiors" is revised to specify inclusion of "façade walls and fixtures, internal structure, ground floor loggia, theatrette and foyer marble cladding." This excludes non-structural features of the office floors and basement carpark from the listing. The inventory has been updated to reflect this post-exhibition review.</p>
C2	Weir Phillips for landowner	<b>Oppose.</b> For the reasons outlined below.	Objection noted and responded to below.

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C2	Weir Phillips for landowner	<p><u>Significance and exclusion guidelines</u>  Disputes study assessment of significance against 7 Heritage Council criteria, using the exclusion guidelines of the Heritage Office guideline. This analysis demonstrates that the criteria for listing are not satisfied and that there are sufficient reasons for exclusion, in particular, due to the extensive alterations to the building over time. Consequently, there is inadequate justification for the heritage listing of the building.</p>	<p><u>Significance and exclusion guidelines</u>  The Heritage Office guide provides inclusion and exclusion guidelines for each of the seven Heritage Council criteria. The submission only references the exclusion guidelines. The Heritage Office guide states that the exclusion guidelines do not cancel out inclusion guidelines and should not be applied in isolation. The study assessment of this building and City review of this proposal consider both reasons for inclusion and exclusion, as required by this guide. The study concludes the former Sydney County Council Building fulfils five Heritage Council criteria for local listing for historic, associations, aesthetic/technical, rarity and representative value. The building is assessed as significant as a fine example of the Late Twentieth Century International Style office, distinguished by its building form and dark toned exterior that are unusual for central Sydney. It is significant for its positive streetscape contribution and demonstrating the work of prominent architects Fowell Mansfield &amp; Maclurcan. It represents potentially the only commercial post-war building in central Sydney resulting from an architectural competition, and the purpose-built headquarters of Sydney's electricity supplier.</p>
C2	Weir Phillips for landowner	<p><u>Competition historic significance</u>  The building being the subject of a design competition is not in itself, of particular historical significance if the design produced is not exceptional or ground-breaking, as noted in the study report. This fulfils the exclusion guideline for historic significance of "provides evidence of activities or processes that are of dubious historical importance."</p>	<p><u>Competition historic significance</u>  The building satisfies the inclusions guidelines for historic significance and rarity at a local level as evidence of the competitive design process in central Sydney during the post-war period; understood to be the only such surviving example. This is not considered of dubious historic importance to satisfy the exclusion guidelines for historic significance. The significance of the subject competition was reported at the time as "one of the most important to be held in Aust for some time" attracting 62 entries. The constructed building reflects the winning design, thereby providing evidence of an early model of the significant competitive design process. Since 2001, these competitions have become an integral part of city planning for design excellence. The merit of the subject design does not affect the building's assessed historic significance or rarity under the Heritage Council criteria and is reviewed separately under aesthetic and representative criteria. The submission therefore does not provide substantive new information to overturn the building's assessed historic significance at a local level.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C2	Weir Phillips for landowner	<p><u>Competition rarity</u></p> <p>There were numerous other commercial buildings that were the subject of a competition, noting the Anzac Building (1948), Sydney Opera House (1956-57) and The Rocks Redevelopment (1963). This fulfils the exclusion guideline for rarity significance of "the building is not rare."</p>	<p><u>Competition rarity</u></p> <p>The building satisfies the inclusion guidelines for rarity as the only example of its type as a surviving competition-designed post-war commercial building in Sydney, and as rare evidence of a significant human activity. Its importance to the architectural and heritage community is indicated by supporting submissions from community organisations and individuals. No submission identifies other surviving examples of competition-designed commercial buildings of the post-war period to dispute this building's assessed rarity or satisfy the exclusion guidelines that these are numerous or not rare. The competitions noted in this submission are not for extant commercial post-war buildings. No record of an "Anzac Building" could be found; only an "Anzac House" competition for a building since demolished. The Rocks Redevelopment design was not constructed due to Green Bans. The one built surviving example of the Opera House is also recognised as world significant; a higher level of significance than required for local listing. While noting other examples, the Heritage Office guide states that an item is not to be excluded on the grounds that others with similar characteristics have already been listed, such as other competition-designed buildings. The submission, and its noted other examples, therefore does not provide substantive new information to overturn the building's assessed rarity at a local level.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C2	Weir Phillips for landowner	<p><u>Associations significance</u> A strong association with the Sydney County Council is not, in itself, of particular historical significance. The Sydney County Council no longer exists. Sydney County Council (SCC) in Sydney is of limited historical importance as the nature of electricity supply to Sydney has undergone substantial and numerous changes since its formation in 1935. The SCC lost most of its functions in 1952 and merged with other Councils to form Sydney Electricity in 1989. In 1996 it merged with Orion to form the Government owned, Energy Australia and in 2011 it changed its name to Ausgrid. The retail arm of Energy Australia was sold to Hong Kong in 2010.</p> <p>The building has been significantly modified, in particular on the exterior, it no longer retains the core architectural characteristics which arise from its connection with Fowell, Mansfield and Maclurcan. The interior has been significantly altered including the removal of the Council Chamber. This fulfils the exclusion guideline of "provides evidence of people or events that are of dubious historical importance" and "has been altered so that it can no longer provide evidence of a particular association."</p>	<p><u>Associations significance</u> The building satisfies the inclusion guidelines as evidence of and association with significant people and activities, including the Sydney County Council for which it was built and the architects responsible for its competition-winning design, Fowell, Mansfield, Jarvis &amp; Maclurcan. Neither are considered of dubious historical importance to satisfy the exclusion guidelines for associations. Fowell, Mansfield, Jarvis &amp; Maclurcan is regarded as a prominent architectural firm of the twentieth century, whose building designs won awards and competitions, including works now recognised as state significant heritage, such as St Anne's Church, Bondi (1964). The association with Sydney County Council is strengthened by the building's purpose-built design for its headquarters, and its long-term occupation and use by this electricity supplier and its subsequent iterations for approximately 50 years during an important period of supplying electricity to Sydney during the second half of the twentieth century. Organisational changes do not affect the significant association of this building with this important function of supplying electricity by Sydney County Council and its subsequent iterations during the twentieth century. Its latest iteration of Ausgrid occupied the building to 2019.</p> <p>The building alterations are considered below. These are minor, reversible or compatible. The original building form and loggia, the open office plans and theatre designed specifically for Sydney County Council functions and other extant original fabric provide evidence of these significant associations. These also provide evidence of the competition design brief for the building to reflect the civic importance of Sydney County Council and its function. The original design can still be appreciated in the extant building and is capable of interpretation and restoration based on the available documentary evidence. This satisfies the inclusion more than the exclusions guidelines.</p> <p>While noting the alterations, the Heritage Office guide also states a building can meet the association criteria "regardless of the intactness of the item or any structure." The submission does not provide substantive new information to overturn the buildings assessed significance for its association with Sydney County Council and Fowell, Mansfield, Jarvis &amp; Maclurcan.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C2	Weir Phillips for landowner	<p><u>Aesthetic and representative significance</u>  This building is representative and demonstrates characteristics of the Late Twentieth Century International Style, including its external silhouette of a tower atop a low horizontal podium, use of modern technology and paired down geometrical repetitious facade using materials of steel, concrete and glass.</p> <p>The building is not defined in the TKD study as a fine example of Late Twentieth Century International Style. It is defined as unexceptional and not ground-breaking.</p> <p>Quotes an online Getty Institute definition for the style as "an emphasis on volume over mass, the use of lightweight, mass-produced, industrial materials, rejection of all ornament and colour, repetitive modular forms, and the use of flat surfaces, typically alternating with areas of glass." The building had limitations regarding these characteristics. It lacked the refined curtain wall cladding of its inspiration, the Lever Building in New York. Where the podium of the Lever Building was light and transparent, the tower of this building was mechanically applied to the podium, making it heavy and lacking in transparency.</p> <p>Describes local examples of Australia Square, AMP building, Sydney Water Corporation building (part demolished), State Office block (demolished).</p> <p>Notes this building is referenced in Jennifer Taylor's "Tall Buildings: Australian Business going Up, 1945-1970" (2001) and Phillip Thalys and Peter John Cantrill's "Public Sydney Drawing The City" (2013). It has been demonstrated that this building is a more modest example of its style.</p>	<p><u>Aesthetic and representative significance</u>  The accepted stylistic features are noted. The study inventory assesses this building as a fine example of a Late Twentieth Century International style commercial building in central Sydney, designed by Fowell, Mansfield, Jarvis &amp; Maclurcan, demonstrating characteristics of the style, with a positive streetscape contribution. The study identifies features unusual for central Sydney at this time including the building's overall form and dark toned exterior, maintained in alterations. Further features identified include the loggia and curtain wall. This satisfies several Heritage Office inclusion guidelines for aesthetic and representative significance, such as for demonstrating creative achievement, aesthetic distinctiveness, and a fine example.</p> <p>The Heritage Office exclusion guidelines do not apply as the building designer is important, the building maintains reasonable design and technical integrity, and degrading additions are either minor or capable of reversal. The quoted American definition for the style, while noted, does not define the style in Australia or Sydney; for which the subject heritage study is more relevant.</p> <p>The study acknowledges the design was not ground-breaking or exceptional, but reflects mainstream corporate architecture of the time, with a similar form to New York's Lever House, and other distinctive features. This contributes to and does not diminish the building's assessed significance. Similarities to Lever House demonstrate the influence of American architecture in Australia for this international style. Differences noted, including its opaqueness, demonstrate local Sydney variations. If this building's significance was equal or comparable to international examples like Lever House, it would meet the criteria for higher levels of listing as state, national or world heritage. While noting some local examples of the style, the Heritage Office guide states that an item is not to be excluded on the grounds that others with similar characteristics have already been listed.</p> <p>The original merit of this example is indicated by the competition win, judged by the Institute of Architect's president. The building is also identified in architectural publications, noted in this submission. Docomomo Australia submits that this building is exceptional for Sydney for its curtain wall aesthetic, as well as its dark finish identified as uncommon for Australia. The submission does not provide substantive new information to overturn the building's assessed aesthetic and representative significance.</p>

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C2	Weir Phillips for landowner	<p><u>Alterations</u>            Since construction, it has been subject to significant and highly visible alterations which have eroded its original architecture and fundamentally changed its external character. The façade was reclad in 1994 and the ground floor was extensively refurbished in 2000. Lists and pictures the alterations, together with historic illustrations. The cladding although superficially consistent with the original design, has been executed in a manner which deviates in critical aspects from the original design vision and has no technical integrity as an example of the international movement. The removal of the marble wall cladding and modification of the granite stair/ platform at ground level and the insertion of retail outlets has compromised the fundamental architectural character of the building and would be difficult to reverse.</p> <p>This fulfils the exclusion guideline for aesthetic and representative significance of "has lost its design of technical significance" and "positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded", "does not include or has lost the range of characteristics of a type" and "the building has lost many of the key characteristics".</p>	<p><u>Alterations</u>            City staff inspected the building interiors with the owners and their other consultant and considered the submitted reports. The 1990s recladding and other alterations are acknowledged in the inventory. The City inspection confirmed the building retains its original podium and tower form, including roof terrace and open loggia, original fenestration pattern and aluminium window frames, and some internal features, with minor, compatible or reversible alterations. The original facade spandrels and mullions are retained behind the 1990s cladding. Internally, the original theatrette form and some marble wall and floor finishes in the ground floor foyers are retained. The office floors retain the open plan grid with structural columns and internal face of the perimeter walls, with some original timber-panelled mullions and under-sill vent panels. The contemporary office fit-outs are not significant.</p> <p>While the 1990s cladding is not a direct match, it reflects the original design intent and dark exteriors, as documented in the 1962 rendering and 1968 black and white photo. It can also be replaced with sympathetic finishes, as currently proposed for fire safety compliance. Documentary evidence, together with surviving in situ fabric, such as loggia marble retained in one foyer, can assist with the restoration of original details.</p> <p>This review and inspection confirm the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. Its significance and original design can still be appreciated in the extant building and is capable of interpretation and restoration based on the available documentary evidence. This satisfies several Heritage Office inclusion guidelines for aesthetic and representative significance as noted above. The exclusion guidelines do not apply as the building designer is important, the building has maintained reasonable design and technical integrity, and degrading additions are either minor or capable of reversal.</p> <p>As a result of this review, it is recommended the proposed item name for the building including "significant interiors" is revised to specify inclusion of "façade walls and fixtures, internal structure, ground floor loggia, theatrette and foyer marble cladding." This excludes non-structural features of the office floors and basement carpark from the listing. The inventory has been updated to reflect this post-exhibition review.</p>

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C2	Weir Phillips for landowner	<p><u>Social significance</u>            There is no evidence to suggest that there is a community or association of ex Sydney County Council employees and therefore that there is any special significance to the building other than that it was associated with the Sydney County Council place of work. There is no memorial board of the Sydney County Council in the building. It is almost thirty years since the Sydney County Council occupied the building. This fulfils the exclusion guideline of "The building is only important to the community for amenity reasons".</p>	<p><u>Social significance</u>            The building has not been assessed in the study as meeting this criterion as one of the seven potential Heritage Council criteria for listing. The significance of the building to the community of former Sydney County Council workers or visitors has not been ascertained at this stage or identified in the inventory. The submissions in support of the heritage value and listing of this building from the community organisations of the National Trust and Docomomo Australia and individual architects and heritage professionals indicate it has potential social significance to the contemporary architectural community. This would satisfy the inclusion guideline of importance to an identifiable group or to the community's sense of place. These submissions do not refer to amenity concerns as the reason for supporting the heritage value and listing of the building in order to satisfy the quoted exclusion guideline.</p>

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C2	Weir Phillips for landowner	<p><u>Development effects</u>  Listing will create impositions far greater than for more modest buildings, with a disproportionate burden on the owner. Office buildings of this type now have an established lifecycle. As requirements for office space change, along with requirement for energy efficiency and occupant facilities, economic pressure demands the building be replaced. As the building ages, its class of office space will be downgraded with resulting lower rental incomes; only arrested with major refurbishment. Listing the building means it will have to be conserved, regardless of economic considerations and could be demolished only in exceptional circumstances. This essentially sterilises an important central city site from further development. The side elevation faces the proposed Town Hall Square. A new building could be designed to take the new square into consideration.</p>	<p><u>Development effects</u>  The non-structural office floors are excluded from the recommended listing and the proposal is amended to enable complying development fit-outs of these excluded interiors. As a result, the development process will be unchanged for most commercial fit-outs. Common tenancy fit-outs or minor repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent', without the need for a development application.</p> <p>Listed buildings can still be upgraded and altered to meet current standards. Listing as a heritage item recognises the heritage significance of the building and ensures this is considered in future development through the development application or other approval process. A heritage listing does not direct the form of development or conservation. The non-prescriptive development assessment process for heritage items provides the opportunity to consider and address building and development issues for the individual building circumstances in a way that respects significant building features. The views and issues of owners and their consultants are considered through this process. By providing advance notice of heritage issues before an application is lodged, listing provides clarity and certainty. Further opportunities to enhance the side elevation interface with the future Town Hall Square and significance of this building, can be explored through this non-prescriptive development application process for heritage items. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. The Far East submission demonstrates their experience with developing heritage items, which can assist with this building. City staff would support a continuation of the positive collaboration to streamline future works and appropriate heritage impact consideration, in the event the building is listed.</p>



No.	Submitter <sup>1</sup>	Submission summary	Submission response
C2	Weir Phillips for landowner	<p><u>Conclusions</u> This heritage assessment does not support the proposed listing of the former Sydney County Council building because it does not meet the threshold for listing as a heritage item under the NSW Heritage criterion.</p>	<p><u>Conclusions</u> The submitted assessment for landowners has been considered, together with other public submissions. The submission does not dispute the building age, style, architect, competition history, use or alterations identified in the study inventory. The submission questions the significance of these facts and its rarity, using definitions or comparisons unrelated to Sydney's local heritage or the subject building type and referring to the building alterations or other information acknowledged in the inventory. The City review of the alterations confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. Its significance and original design can still be appreciated in the extant building and is capable of interpretation and restoration based on available documentary evidence. Docomomo Australia and further heritage and architect professionals and organisations support the building's heritage value and listing. The submission does not provide substantive new information to overturn the study assessment that the building satisfies at least one Heritage Council listing criteria. The submission only references the exclusion guidelines in the Heritage Office guide for assessing significance, without also considering the satisfied guidelines for inclusion. The study assessment of this building and City review consider both reasons for inclusion and exclusion in accordance with the Heritage Office guide. The assessed local significance of the building under five criteria is supported for its historic, associations, aesthetic/ technical, rarity and representative value. The building therefore warrants listing as a local heritage item. As a result of this review, it is recommended the proposed item name for the building including "significant interiors" is revised to specify inclusion of "façade walls and fixtures, internal structure, ground floor loggia, theatrette and foyer marble cladding." This excludes non-structural features of the office floors and basement carpark from the listing. The inventory has been updated to reflect this post-exhibition review.</p>
C3	Far East Town Hall Pty. Ltd., landowner	<b>Oppose.</b> For the reasons outlined below.	Objection noted and responded to below.

No.	Submitter <sup>1</sup>	Submission summary	Submission response
C3	Far East Town Hall Pty. Ltd., landowner	<p><u>Far East record</u></p> <p>The owner company is an entity of Far East Organization, a property development company established in Singapore in 1960. With close to 60 years history, Far East and its sister company, Sino Group in Hong Kong, and other related entities have successfully restored and manage numerous historical buildings across Singapore, Hong Kong and the United Kingdom. They won the 2013 UNESCO Asia-Pacific Award in Cultural Heritage Conservation for the Tai O Heritage Hotel in Lantau Island, Hong Kong; a testament to their commitment to heritage conservation. Provided case studies of 12 other owned heritage assets, including Sydney's GPO.</p>	<p><u>Far East record</u></p> <p>The Far East record of heritage custodianship is noted. Far East's experience with other heritage assets will assist the owner with the development process for heritage buildings. During the listing process, Far East's open collaboration with City staff ahead of planned works to this building and proactive consideration of heritage issues, even where Council's consent is not required, is also recognised. City staff would support a continuation of this positive collaboration to streamline future works and appropriate heritage impact consideration, in the event the building is listed.</p>
C3	Far East Town Hall Pty. Ltd., landowner	<p><u>Heritage merit and detail</u></p> <p>Far East respect and support local conservation efforts. In Australia, they have remediated the GPO building and supporting its nomination to the National Heritage List, demonstrating they are not averse to heritage listing with merit. The two heritage assessments they engaged both conclude the building does not meet the listing threshold and should not be listed. The study lacks sufficient details to help landowners understand what is proposed to be conserved and maintained.</p>	<p><u>Heritage merit and detail</u></p> <p>The listing is based on the recommendation of an independent heritage study of the Modern Movement in central Sydney and an individual heritage assessment of this building, prepared in accordance with the Heritage Council criteria and supporting Heritage Office guide. The study identifies this building as worthy of local listing as an example of local heritage significance. The former Sydney County Council Building is assessed as significant as a fine example of the Late Twentieth Century International Style office, distinguished by its building form and dark toned exterior that are unusual for central Sydney. It is significant for its positive streetscape contribution and demonstrating the work of prominent architects Fowell Mansfield &amp; Maclurcan. It represents potentially the only commercial post-war building in central Sydney resulting from an architectural competition, and the purpose-built headquarters of Sydney's electricity supplier.</p> <p>The Extent heritage assessment was exhibited with the planning proposal. This and the second heritage submission for the landowner are considered above. These assessments do not present substantive new information to overturn the study assessment that the building satisfies at least one Heritage Council listing criteria of local heritage significance. Docomomo Australia and further heritage and architect professionals and organisations support the building's heritage value and listing. As a result of this review, it is recommended the proposed item name for the building including "significant interiors" is revised to specify inclusion of "façade walls and fixtures, internal structure, ground floor loggia, theatrette and foyer marble cladding." This excludes non-structural features of the office floors and basement carpark from the listing. The inventory has been updated to reflect this post-exhibition review.</p>

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C3	Far East Town Hall Pty. Ltd., landowner	<p><u>Central Sydney Planning Strategy development opportunities</u>  The proposed heritage-listing appears to directly contradict Council's vision for the city in its proposed Draft Central Sydney Planning Strategy and future Town Hall Square. The building is located immediately adjacent to one of the three proposed civic squares, Town Hall Square, under the draft strategy. In 2017 and early 2018 Council encouraged Far East to explore how a mixed-use development on this site could complement the proposed square and broader strategy. While discussions were exploratory, the proposed listing came as a surprise, aborting the cost of concept plans they had prepared. If the building is heritage listed, it will be at a significant cost, as a missed opportunity to develop a landmark on this site that can further anchor Sydney as a vibrant cosmopolitan city, contribute to new jobs, enhance tourism and make the city centre more attractive.</p> <p>Retaining the building in its current form will remove its potential to contribute to the square with a more sympathetic and congruent building, ongoing efforts to pedestrianize and inject greater vibrancy to George Street, and above and underground pedestrian links between key transport nodes of Town Hall Station, Sydney Light Rail and future Pitt Street Metro Station. This opportunity to contribute to the draft Central Sydney Strategy is sterilised by listing. Far East has a strong track record in developing quality assets with strong urban design outcomes, demonstrated by multiple international awards, such as for the Oasia Downtown in Singapore. Far East request Council withdraw this planning proposal in order to undertake a comprehensive review against the aims and objectives for the city's future under the Central Sydney Planning Strategy, before it is resubmitted to the Department.</p>	<p><u>Central Sydney Planning Strategy development opportunities</u>  The significance of the building and consistency with the draft Central Sydney Planning Strategy was considered in preparing this proposal for listing, and reviewed further by City staff after exhibition, including consideration of all submissions. The existing building is assessed as having local heritage significance for its aesthetic, historic and other values in the heritage study completed in early 2018. City staff reported this study to Council with a planning proposal as soon as possible after its completion to gain greater certainty about the recommended listings, then adopted for public exhibition in late 2018. It is acknowledged the listing is a new direction for this property and resulting opportunities based on the new information of the heritage study and Council resolution. As assessed local heritage, this building contributes to the identity, streetscapes, history and culture of Sydney in its current form. If listed, the owners of this building will have the opportunity to seek a heritage floor space award to fund its ongoing conservation.</p> <p>Listing and retention of this building is consistent with the vision of the Central Sydney Planning Strategy for growth and plans for a future Town Hall Square. The listing is compatible with the objects of the strategy which seeks to facilitate growth in a way that maintains central Sydney's identity, including its heritage items and sunlight access to public open spaces. The retention of this building will not impede delivery of the 2.9 million square metres of additional employment floor space unlocked under the strategy. Retention of this building will continue to contribute its existing commercial floor space and potentially facilitate further floor space in the city centre if the owners seek a heritage floor space award.</p> <p>The existing building can also contribute to future Town Hall Square. The lower podium and loggia along George Street will front the square. The taller corner tower, setback to the south, frames the open space, together with other surrounding Victorian and proposed modern heritage items, without overshadowing the square. Further opportunities to enhance the ground level interface, connectivity and significance of this building, can be explored through the development application process for alterations to heritage items. Owners are encouraged to arrange pre-applications meetings with City planners to discuss plans to integrate the building with the square.</p>

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A2	Docomomo Australia Inc	<p><b>Support.</b> The importance of the design competition is questioned by the owner's heritage consultants. These competitions were usually restricted to government and other public buildings. The architects of this tower were a young couple, James Kell and Diana Parrott. When they won the competition, Fowell, Mansfield &amp; Maclurcan required Kell to bring the project to the firm. Kell's and Parrott's role in the design and government support for the up and coming design generation should be acknowledged. The comment the "competition didn't produce a design of exceptional or ground-breaking character" is not supported because the design was expressing a curtain wall aesthetic that broke away from the aluminium-framed curtain walls of the early Modern skyscrapers and the increasingly popular load-bearing precast panel buildings emerging in the late 1960s and early 1970s. Taylor's 2001 study of high-rise offices in Australia states the dark finish was "uncommon for Australia...with polished black granite mullion cladding and exposed aggregate black granite chips in the spandrels". The 1990s spandrel panel refurbishment in no way diminishes the importance of the design. The building retains its original design intent and aesthetic above the ground floor. Docomomo Australia supports the inventory management recommendations and encourages reinstatement of marble facing to the ground floor.</p>	<p>Support noted. The inventory has been updated to name Kell and Parrott as project architects, alongside the architectural firm, and to encourage reinstatement of marble cladding in the management recommendations.</p>
A15	Glenn A Harper	<p><b>Support.</b> This and the other two curtain wall buildings of the William Bland Centre and 62 Pitt Street have representative significance. Exhibiting the integration of curtain wall technology within the office type, these buildings still retain their original curtain wall fabric. The integrity of these facades must be recognised in the heritage listing.</p>	<p>Support noted. The inventory has been updated to note the retention of original facade fabric underneath the recladding. The revised listing includes the curtain wall.</p>