

Attachment B1

**Summary of Submissions –
All or Multiple Items**

Summary of submissions

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No.	Submitter ¹	Submission summary	Submission response
A All or multiple items			
A1	Heritage Council of NSW and Heritage NSW	<p>Support. The nine proposed local heritage items represent examples of the Modern Movement in Sydney. Note five of these items are identified as potentially state significant. The MLC Centre is the only heritage item that has a current nomination for the State Heritage Register (SHR). The Heritage Council is currently reviewing the priority of all open SHR nominations. TKD Architects also completed a thematic study on the Modern Movement for the Heritage Council of NSW.</p> <p>Note the Gateway determination required heritage assessments prepared by landowners to be exhibited with the planning proposal. Heritage NSW encourages the identification and listing of new heritage items, providing the necessary due diligence, assessments and notifications have been undertaken. As such, the public exhibition of this proposal along with the heritage assessments prepared by the landowners is considered an appropriate approach.</p>	<p>Support noted. As noted by the Heritage Council, the author of the City study also completed the NSW thematic study in 2013 for the Heritage Council. The NSW thematic history has informed this study. Council included the owners' heritage assessments in the public exhibition. City staff considered all landowner and other submissions, including the exhibited heritage assessments, met with landowners and inspected the building as requested, in order to review this proposal following the public exhibition. As a result of the post-exhibition City review, the listings have been revised and inventories updated.</p> <p>For this planning proposal, Council's decision relates to the local heritage significance of the building to meet the criteria for listing on the local plan. For buildings also assessed as state significant of Sydney Masonic Centre, Town Hall House, MLC Centre, Horwitz House and Earth Mother play sculpture, nominations for the State Heritage Register are not proposed at this stage. The landowners may wish to consider this option to access heritage grants for repair or adaptive reuse of the buildings in the future.</p>
A2	Docomomo Australia Inc	<p>Support. Docomomo Australia is an advising organisation to UNESCO regarding modern architectural heritage, charged with identifying, documenting and conserving buildings, sites and neighbourhoods of the Modern Movement. Based on examining the exhibited planning proposal, TKD and owners' consultants' reports, Docomomo supports the proposal to list 9 items of local significance on the Sydney LEP 2012. All listing inventories should list all the elements that are of significance and must be retained, such as sculptures, internal and external finishes and design details etc. Comments specific to the proposed items are included with the other submissions for each item below.</p>	<p>Support noted. As a result of the post-exhibition City review, the listings have been revised and inventories updated to identify significant features in more detail, where possible. The item names briefly identify significant features, including interiors. This is in accordance with the directions contained in the Standard Instrument (Local Environmental Plans) Order 2006 for item naming. Where detailed heritage assessments of building interiors are available and the assessment is confirmed by City staff review, significant internal features are identified in more detail in the inventory. The non-statutory heritage inventories can continue to be updated, before or after listing, as new information becomes available, such as through completion of a conservation management plan. The specific comments on each of the proposed items are responded to below with the other submissions on these items.</p>

¹ Submitters are named with permission from the submitter

No.	Submitter ¹	Submission summary	Submission response
A3	The National Trust of Australia (NSW)	<p>Support. The National Trust has examined Council's planning proposal to list a number of Central Sydney Modern Movement heritage items. The National Trust supports the proposal to list all 9. With respect to the MLC Centre, the National Trust's Built Heritage Conservation Committee has recommended to the National Trust Board the listing of the Harry Seidler designed Theatre Royal within the MLC Centre for listing on the National Trust Register. It listed the National Trust listing report will be forwarded to Council.</p>	Support noted. The listing report have been received and included below with the MLC Centre submissions.
A4	Property Council of Australia	<p>Support. As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers, and developers of property across all asset classes.</p>	Support noted and comments responded to below.
A4	Property Council of Australia	<p><u>Study and significance</u></p> <p>The City's decision to undertake a heritage study into the Modern Movement (1945-1975) is supported. The study identifies a strong field of buildings and other structures, including artworks, worthy of consideration for listing. The study provides a strong argument in support of the preservation of suitable buildings from this period. These evidence the economic and social circumstances from this important 30-year period, particularly the impact of post-war austerity followed by the "Long Boom" and its eventual collapse. The architectural quality of the buildings reflects the importance of those responsible for each commission. Central Sydney was the site of one of the greatest concentrations of Modern Movement buildings in NSW. A number of comparative studies of Modern Movement architecture have been carried out both at the State level in Victoria (2008) and NSW (2013) and at the local level with Woollahra Municipality in NSW (2005) and Bayside Council in Victoria (2008). The City's interest in and decision to investigate the merit of heritage protection of buildings from this period is welcomed.</p>	<p><u>Study and significance</u></p> <p>Support noted.</p>

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A4	Property Council of Australia	<p><u>Conservation</u></p> <p>The study also identifies several issues needing to be resolved as part of the listing process, such as conservation methods for modern buildings involving non-traditional materials, poor workmanship and obsolete building services. It is important there is clarity over these issues before the planning proposal is made.</p>	<p><u>Conservation</u></p> <p>Listed buildings can still be repaired and upgraded to meet current building standards. In response to materials conservation issues, the study notes modern listed buildings are now undertaking conservation works and careful refurbishment, including Qantas House where the facade was drained and resealed rather than replaced. Listing as a heritage item recognises the heritage significance of a building and ensures this is considered in future development. A heritage listing does not direct the form of development or conservation. It is most appropriate to consider and address these issues through the development application process when a detailed proposal is prepared. The non-prescriptive development assessment process for heritage items enables the form of development or conservation to be determined in response to the individual building features and circumstances, while also retaining significance. The views and issues of owners, their consultants and public submissions are considered through this process. Council's development assessment seeks to retain significant fabric where capable of repair and compliance, or otherwise replaced with sympathetic alternatives. For instance, Council approved additional internal sashes to improve thermal and acoustic performance for the listed Transport House, whilst retaining the original façade. Listing gives building owners the option to recoup upgrade, repair or conservation costs through a heritage floor space award.</p>
A4	Property Council of Australia	<p><u>Landowner views</u></p> <p>The Property Council notes that the City has been in contact with all landowners affected by the planning proposal to inform them individually of the proposed heritage listing of their property and that 4 landowners have obtained their own heritage advice. It is understood that several of these heritage reports have provided additional detail to the Council that will assist with the decision-making process. In the case of the former Sydney County Council office building at 552A-570 George Street, the landowner has supplied information about the competitive design process associated with the building's design and the intactness/integrity of the building interiors and external facade. The landowner of the William Bland Centre has submitted a report that questions whether the building is representative of the Modern Movement. It is appropriate that the City take into consideration the views of landowners and additional information relevant to the listing of their premises.</p>	<p><u>Landowner views</u></p> <p>The buildings are identified for listing based on an independent heritage study and individual heritage assessments, in accordance with the Heritage Council criteria and Heritage Office guide. Council's consultation and exhibition for this planning proposal complies with and in some cases exceeds the statutory and Departmental requirements, including consultation before exhibition and an extended exhibition period of 2 months to ensure owners had the opportunity to comment. Council included the owners' heritage assessments in the public exhibition. City staff considered all landowner and other submissions, including the quoted heritage assessments, met with landowners and inspected the buildings as requested, in order to review this proposal following the public exhibition. Submissions were also received in support of the proposed listings. As a result of the post-exhibition review, the listings have been revised and inventories updated. While community views about heritage and aesthetics can be varied, it is important that local history is recognised, including City of Sydney's more recent heritage of modern post-war architecture. Listing provides certainty by recognising the assessed heritage significance of buildings, alerting owners that heritage is a consideration ahead of a development application and giving owners access to conservation incentives.</p>

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A4	Property Council of Australia	<p><u>Heritage floor space</u> A consequence of the planning proposal is the potential for creation of additional heritage floor space. A building owner may be eligible to seek an award of heritage floor space subject to meeting the requirements. The potential for creation of heritage floor space by the City is welcomed. They acknowledge it should not play a part in the decision to list new heritage items. Those decisions need to be made having regard to the building's heritage significance. It is unclear whether the City will be entitled to an award for Town Hall House. Given the Council has roles in both listing of heritage items and the regulation of the heritage floor space scheme, it is expected Council would be seeking advice from a probity adviser. The Property Council will raise issues with this scheme separately with Council, about the scheme's ability to service the market without obstructing major projects and meet the projected development potential. Despite recent changes, demand continues to outstrip supply, resulting heritage floor space rising in per metre square cost from \$1,000 in 2016 to over \$2,100 in 2019, an unsustainable increase of approx 30% annually.</p>	<p><u>Heritage floor space</u> This listing proposal is based on the assessed heritage significance of the identified buildings. The heritage floor space scheme provides an incentive for the conservation and ongoing maintenance of heritage buildings within central Sydney, including both public and private buildings. If listed as a heritage item as proposed, the Council-owned property of Town Hall House will be eligible for a heritage floor space award. This building has been independently identified and assessed for listing using the same measures and process as the other 7 buildings, as disclosed in the Council reports and outlined above. The Council-owned Earth Mother sculpture will not be eligible for a heritage floor space award that only applies to buildings. Applications for heritage floor space awards for Council-owned property are assessed independently to ensure no conflict of interest.</p> <p>The City of Sydney continues to monitor the situation with Heritage Floor Space, noting recent changes have brought additional supply to market with more imminent.</p>
A5	AMP Capital	<p>No objection. AMP Capital is an institutional investment house that is part of the ASX listed AMP. They are long-term asset managers and developers with over \$28.9 billions of retail, commercial and industrial property through the Asia Pacific and over 60 years' experience managing and investing in real estate. AMP Capital Real Estate manages and has interests in many significant commercial buildings in the City of Sydney, noting 13 properties including the listed 33 Alfred Street.</p>	<p>No objection and comments noted and responded to below.</p>
A5	AMP Capital	<p><u>Significance</u> The study recommended nine examples of Modern Movement architecture for local heritage listing. The Heritage Council of NSW stated that "the modern movement period produced some of the 20th century's most important architecture, including styles known as modern, international, brutalist and Sydney school." The Lord Mayor said the modern movement era was an important chapter in Sydney's architectural history and should be preserved and "As Sydney experiences unprecedented development, it's important we preserve those buildings of significant heritage value."</p>	<p><u>Significance</u> Noted.</p>

No.	Submitter ¹	Submission summary	Submission response
A5	AMP Capital	<p><u>Listing process</u> AMP Capital recommends robust, consistent and transparent processes that are designed, documented and exhibited by the City of Sydney to identify buildings which rightfully belong on the heritage register so that the market has clear and consistent signals in the way Council values and treats potential heritage items.</p>	<p><u>Listing process</u> The proposed listings have been assessed, exhibited and rigorously reviewed, using the process described in the Council reports, in accordance with heritage, statutory and NSW government requirements. The buildings are identified for listing based on an independent heritage study and individual heritage assessment, by TKD Architects, commenced at the direction of a Council resolution to identify post-war modern buildings. The listing standards used are the NSW Heritage Council criteria and supporting Heritage Office guide for assessing local heritage significance. City of Sydney reviewed the study identified buildings against three further criteria to establish their significance can still be appreciated before inclusion in the planning proposal for exhibition. The amendment to the local environmental plan and exhibition has been processed in accordance with the requirements of the Environmental Planning and Assessment Act 1979 and Department of Planning Industry and Environment's gateway determination.</p>
A5	AMP Capital	<p><u>Upkeep</u> The City must demonstrate that these more modern buildings require the same level of upkeep and restoration as those older listed buildings constructed to different standards.</p>	<p><u>Upkeep</u> The non-prescriptive effects of listing apply equally to modern as well as older buildings of different construction standards. Listing recognises the heritage significance of a building and ensures this is considered in future development. Listing does not direct the form of development or conservation. These issues are addressed through the development application process when a detailed proposal is prepared. The development assessment process for heritage items enables the form of development or conservation to be determined in response to the individual building features and circumstances, while also retaining significance. The views and issues of owners, their consultants and public submissions are considered through this process. Council's development assessment seeks to retain significant fabric where capable of repair and compliance, or otherwise replaced with sympathetic alternatives. For instance, Council approved additional internal sashes to improve thermal and acoustic performance for the listed Transport House, whilst retaining the original façade. Owners may propose some restoration, where appropriate, in support of a heritage floor space award. Listing gives building owners the option to recoup upgrade, repair or conservation costs through a heritage floor space award.</p>

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A5	AMP Capital	<p><u>Heritage floor space</u> The additional Heritage Floor Space (HFS) these buildings would 'release' is much needed in the City of Sydney "in a period of unprecedented development" where current demand for HFS outstrips supply. The heritage floor space system itself requires refreshment. It needs to be demonstrated that the heritage floor space system applies to the preservation of buildings that are less the 100 years old. AMP Capital understands this scheme is to allow for the upgrade of a "heritage" building which would otherwise involve an unfeasible cost for different restoration practices than is required of a modernist building. A modernist building is far from a sandstone historical monument that needs careful restoration to upkeep or maintain. For instance, the Seidler MLC tower has recently had a facade upgrade. Accordingly, what building upkeep is the award meant to help with?</p>	<p><u>Heritage floor space</u> Sydney's heritage and recognition through heritage listing is not restricted to older buildings, although modern heritage is currently under-recognised with only 10 standalone heritage items in central Sydney designed between 1945 and 1975. The heritage floor space scheme provides an incentive for the conservation and ongoing maintenance of heritage buildings within central Sydney. Building age does not affect the operation of this scheme. If the 8 buildings are listed as proposed, these additional heritage items will be eligible for a heritage floor space award, in the same manner as older buildings. The form of conservation for a heritage floor space award would reflect the significant building features of these modern buildings. In the event all appropriate conservation works have been completed before listing, heritage floor space can be awarded retrospectively for previously completed conservation works, to assist with ongoing maintenance. The City of Sydney continues to monitor the situation with Heritage Floor Space, noting recent changes have brought additional supply to market with more imminent.</p>
A5	AMP Capital	<p><u>Council assets</u> Conflicts of interest need to be identified and appropriately managed given that the City owns buildings that are identified for heritage status given that the City design, administers and controls the HFS system. Where the City of City is the beneficiary of heritage floor space and the administrator of the system, all stakeholders must be confident there is rigorous and independent control of the heritage floor space system and listing of property owned by the City. AMP Capital believes it is essential that the identification of Council owned assets as heritage items is assessed with rigour, independence, measured against consistent and transparent processes, which have been designed, documented and exhibited by the City of Sydney.</p>	<p><u>Council assets</u> The heritage floor space scheme provides an incentive for the conservation and ongoing maintenance of heritage buildings within central Sydney, including both public and private buildings. If listed as a heritage item as proposed, the Council-owned property of Town Hall House will be eligible for a heritage floor space award. This building has been independently identified and assessed for listing using the same measures and process as the other 7 buildings, as disclosed in the Council reports and outlined above. The Council-owned Earth Mother sculpture will not be eligible for a heritage floor space award that only applies to buildings. Applications for heritage floor space awards for Council-owned property are assessed independently to ensure no conflict of interest.</p>

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A6	Jessica Bokey	<p>Support and oppose. What a sorry state of architecture. The only buildings worth preserving are the Masonic Centre, MLC and Earth Mother. Others, although built at a specific time in our history are pretty poor examples. Their only concern is that if they are pulled down, looking at the current standard of architecture, what will be put up in their place? They can only hope that new buildings will have architectural merits and not just built to price as is our current trend.</p>	<p>Support and objections noted. This submission represents a current community view about the heritage value of the identified buildings and artworks. The listings are based on the recommendation of an independent heritage study of the Modern Movement in central Sydney. From more than 110 post-war buildings surveyed in central Sydney, the study identifies the 9 buildings and artworks as worthy of local listing for their assessed heritage significance. The study recognises the diversity of the Modern Movement including both the supported brutalist concrete buildings and buildings of other construction styles. While community views about heritage and aesthetics can be varied, it is important that local history is recognised, including City of Sydney's more recent heritage of modern post-war architecture.</p>
A7	Carolyn Johnstone	<p>Support. Absolutely critical to Sydney's streetscape and history to protect these modernist and brutalist gems. We can't afford to see a repeat of the Sirius saga. And we can't trust the State Government to do the protecting.</p>	<p>Support noted.</p>
A8	Community member	<p>Support. When so much is changing around us, it makes them feel safe to know that Clover and staff at the City of Sydney are at least one group who actually cares about our heritage. Some things are worth preserving and they feel the City of Sydney really understands this and is doing the job it's put there to do.</p>	<p>Support noted.</p>
A9	Community member	<p>Support. They are a regular Sydney visitor. Like all great cities, Sydney's visual and architectural heritage depends on many styles representing the city's history and development. Some styles are more and less superficially attractive than others. This does not mean less popular styles do not have architectural or aesthetic merit and do not contribute meaningfully to the urban landscape. They support the heritage listing of all the structures listed. They urge inclusion of others such as the Sirius building, as a unique example of high-quality architectural design applied to social housing, and other examples of Brutalist mid-century architecture. The Opera House is a Modernist Brutalist building, exemplified by its exposed concrete and deliberate celebration of its construction. No one doubts its architectural merit or its worthiness of preservation. They hope that the buildings will receive a fair assessment based on their architectural merit and contributions to the visual history of Sydney, rather than decisions based on personal taste and opinion.</p>	<p>Support noted. The listings are based on the recommendation of an independent heritage study of the Modern Movement in central Sydney. From more than 110 post-war buildings surveyed in central Sydney, the study identifies the 9 buildings and artworks as worthy of local listing. The study recognises the diversity of the Modern Movement including brutalist and other building styles. Two brutalist buildings of Town Hall House and the Sydney Masonic Centre are included as proposed heritage items. The Sirius building is not assessed as part of this study and planning proposal because it is located on land not under Council's planning jurisdiction.</p>

No.	Submitter ¹	Submission summary	Submission response
A10	Caroline Noonan-Edwards	<p>Support. It is extremely important to recognise and maintain Sydney's cityscape. These 20th century post war and modern movement buildings and sculpture are an integral part. Their architectural and civic significance should be maintained for future citizens to enjoy and learn from. These buildings represent a time of government architecture and building development that looked to be innovative and long-lasting as well as provide spaces in which people could live and work more holistically. It would be a terrible shame if any of these 'civic' buildings were to be demolished or significantly altered to meet population or development growth needs which are nowadays far too often focused on economic or political advantage.</p>	Support noted.
A11	Stephen Batey	<p>Support. The Modern movement is a vital chapter in the history of development in Australia. Not just because of the style of the buildings but also the way designers approached the way a site was used. It is just as important that good examples of the modern movement or post-war era be conserved as those of Colonial, Victorian or Federation eras for what we can understand about the development of our cities and our societies. All of the identified examples are worthy of consideration.</p>	Support noted.
A12	David Ellison	<p>Support. All these properties deserve heritage listing. Great cities depend upon a diverse urban fabric, as well as the stimulation provided by distinctive and distinguished architecture. Sydney was in many respects a great Modernist city, although the traces of that are disappearing rapidly. Securing these buildings against the rapacity of mediocre developers is a precious gift to the present and the future.</p>	Support noted.
A13	Flavia Scardamaglia	<p>Support. They are very proud to live in the City of Sydney and to finally see this study and listings come true. They wish other local governments will follow the City's lead and more 20th century heritage will be protected. Well done for leading the way!</p>	Support noted.
A14	Community member	<p>Support. I support all of these proposed listings.</p>	Support noted.

No.	Submitter ¹	Submission summary	Submission response
A15	Glenn A Harper	<p>Support. As a heritage architect, independent researcher, PhD candidate at Sydney University, long term member of the Australian Institute of Architects Heritage Committee (NSW Chapter), member of DOCOMOMO (Australia), editor of the Brutalist Sydney Map Guide (2017) and author of the monograph Brutalist Sydney (2018), they support the proposed listings. Specific comments for individual items are outlined below. He congratulates City of Sydney for recognising these items, when so few Modern Movement buildings are currently listed in central Sydney. Importantly, these listings represent a crucial step in the recognition of culturally significant late modern heritage in the city, as each have immense heritage value. Attributing statutory protection will allow the current and future community of Sydney to share in the recognition of this important period of architectural production.</p>	Support noted. Comments on individual items are included and responded to below with other submissions for these items.
A16	Angelo Candalepas, Candalepas Associates	<p>Support. They wish to record their interest in all of the nominated buildings being listed. It is an incredibly important initiative of Council to enable the longevity of these buildings, in a vulnerable period of their own history, as masterful architectural works yet of recent generations. It is easy for our generation to disregard their importance in the context of competitiveness of significance with more contemporary work. This would be an error. It is therefore important that Council list these particular buildings which demonstrate, for each of the examples, extraordinary architectural contributions to our city. Such contributions are becoming rarer.</p>	Support noted.

No.	Submitter ¹	Submission summary	Submission response
A17	Shaun Carter, Carter Williamson	<p>Support. Having reviewed all the proposed listings, the City's assessment is warranted. We must protect our heritage, particularly our modern heritage, to be able to tell the stories of where we have come from and remember our past. If we lose these exemplary buildings, we begin to lose ourselves. A further important planning reason to list these buildings, not only for social, cultural and architectural value, is they provide gaps between taller buildings to provide the amenity of light and openness taller cities periodically need. Increasingly we need to be aware of the environmental impact of demolishing buildings every 50 years. These buildings hold large carbon reserves and embodied energy. To release that after only a short period of time is incredibly wasteful and adds to the effects of climate change. Strongly recommend these listings are supported.</p>	Support noted.
A18	Anonymous	<p>Oppose. Absolutely none of these buildings/pieces are worth granting heritage status. If the City of Sydney proceeds to heritage list any of these, it will make a mockery of heritage protection. Sydney has some wonderful heritage, which we should protect. None of this list fits that bill. They cannot believe this is a serious proposal. Sydney would be better off without many of these buildings. It would be common sense to drop this proposal completely.</p>	<p>Objection noted. It is acknowledged that this submission represents a current community view about the heritage value about the identified buildings and artworks. The listings are based on the recommendation of an independent heritage study of the Modern Movement in central Sydney, prepared in accordance with Heritage Council criteria and the supporting Heritage Office guide. From more than 110 post-war buildings surveyed in central Sydney, the study identifies the 9 buildings and artworks as worthy of local listing for their assessed heritage significance. While community views about heritage and aesthetics can be varied, it is important that local history is recognised, including City of Sydney's more recent heritage of modern post-war architecture.</p>
A19	Bill Hatossy	<p>Oppose. None of these buildings have the slightest architectural or artistic merit whatsoever. They were an eyesore when built and still are to this day.</p>	<p>Objection noted. It is acknowledged that this submission represents a current community view about the heritage value about the identified buildings and artworks. The listings are based on the recommendation of an independent heritage study of the Modern Movement in central Sydney, prepared in accordance with Heritage Council criteria and the supporting Heritage Office guide. From more than 110 post-war buildings surveyed in central Sydney, the study identifies the 9 buildings and artworks as worthy of local listing for their assessed heritage significance. While community views about heritage and aesthetics can be varied, it is important that local history is recognised, including City of Sydney's more recent heritage of modern post-war architecture.</p>
A20	Andrew Woodhouse	<p>Oppose. Register his objection published in City Hub on 11/9/2019 and Sydney Morning Herald on 13/9/2019.</p>	Objection noted and responded to below.

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A20	Andrew Woodhouse	<p><u>Excluded buildings</u> The study recommends 14 buildings and artworks. Why are 5 missing? The list omits references to the Sirius Building in The Rocks or the Surry Hills NSW Police Force building. Or are these too ugly to contemplate and well-known for their “brutalist” aesthetic?</p>	<p><u>Excluded buildings and brutalism</u> Two brutalist buildings of Town Hall House and the Sydney Masonic Centre are included as proposed heritage items. All buildings within the study scope have been impartially assessed using the criteria and process set out in the Council reports before exhibition. The study assesses the significance of these buildings and art under the Heritage Council criteria for local listing. For inclusion in the planning proposal, the City reviewed the study recommended buildings and artworks against 3 additional criteria to establish that their assessed significance could still be reasonably appreciated, in terms of having sufficient integrity, comparative value within the local area, and a significance that is maintained in approved or advanced plans. The City pre-exhibition review found the 9 included buildings and art met these additional criteria, whereas the 5 excluded buildings did not. The Surry Hills Police and Millers Point Sirius buildings are not assessed as part of this study and planning proposal because they are located outside of the study area of central Sydney or on land excluded from Council's planning jurisdiction.</p>
A20	Andrew Woodhouse	<p><u>Owner objections</u> Council has to base its decisions on the merits of each site and cannot ignore owners' views because its consultation strategy states submissions will be considered and acknowledged. The Sydney Masonic Centre, former Sydney County Council building, St Peter's Church and the William Bland Centre all disagree with Council's heritage study. The concerns align with the study, noting problems of alterations, changed uses, poorly made, deterioration, new technology, material repairs for which conservation practices have not evolved, lacking originality and intactness. Owners have been “brutalist”. They employed specialists. Differing conclusions from the owner assessments are quoted. Sydney Morning Herald article quotes Andrew Woodhouse saying council's move to list the buildings is “controversial”, should not “ignore owners' views on their own buildings”, “I object to heritage-listing items where the owners raise valid objections,” and these objections appear “convincing”, “Council should now set aside the proposals for sites objected to and undertake further analysis based on this new evidence” and “Good heritage planning requires certainty, consistency and clarity.”</p>	<p><u>Landowner objections</u> Planning controls, including heritage listings, are updated over time to respond to emerging information, community expectations to conserve heritage and for orderly development. The proposed listing has been assessed, exhibited and rigorously reviewed over a number of years. These buildings are identified for listing based on an independent heritage study and individual heritage assessments. The building construction, materials and alterations are acknowledged in the inventories for the identified buildings. City staff reviewed the study assessment before including the building in the planning proposal in 2018, as well as after the public exhibition of 2019. Council's consultation and exhibition for this planning proposal complies with and in some cases exceeds the statutory and Departmental requirements, including consultation before exhibition and an extended exhibition period of 2 months to ensure owners had the opportunity to comment. The owners' heritage assessments were included in the exhibition. City staff considered all landowner and other submissions, including the heritage assessments, met with landowners and inspected the buildings as requested, in order to review this proposal following the public exhibition. Submissions have also been received in support. Following exhibition, the listings have been revised. Listing provides certainty by recognising the assessed heritage significance of buildings, alerting owners that heritage is a consideration ahead of a development application and giving owners access to conservation incentives.</p>