

Attachment D

<p>Summary of Submissions – William Bland Centre</p>

Summary of submissions

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No.	Submitter ¹	Submission summary	Submission response
F	William Bland Centre, 229-231 Macquarie Street, Sydney		
F1	GBA Heritage for landowner	Oppose. The building should not be listed for the reasons outlined below.	Objection noted and issues responded to below. This assessment prepared for the landowner was exhibited with the proposal.
F1	GBA Heritage for landowner (26/7/19)	<u>Listing justification</u> Listing justification is insufficient. The building is relatively undistinguished and of little relevance to the planning proposal as an exemplar of the Modern Movement.	<u>Listing justification</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. From a survey of more than 110 Modern Movement buildings in the central Sydney, the study identifies this building as worthy of local listing. Further City review before exhibition supported this study recommendation. The study concludes the William Bland Centre fulfils six Heritage Council criteria for local listing for its historic, associations, aesthetic/ technical, research, rarity and representative significance. A building does not need to be an 'exemplar' or ideal model for listing under the Heritage Council criteria. The Heritage Office guide instead refers to 'examples'. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern. It demonstrates the work of respected emigre architect Hans Peter Oser and the oldest known surviving example of lift slab construction in central Sydney. It also has significant associations with the medical profession.

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¹ Submitters are named with permission from the submitter

No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Modern Movement characteristics</u> Apart from its facade, the building does not adequately demonstrate the defining Modern Movement characteristics identified in the TKD study. The TKD study achievement is that it identifies a series of specific criteria which distinguish Modern Movement buildings in the City of Sydney. The TKD study identifies 13 characteristics as essential to meet the heritage listing planning proposal. The building does not demonstrate 6 quoted characteristics of: geometric forms, framed systems that enable open planning and encourage transparency, flexible planning aided by framed building construction, to be seen as free-standing objects, asymmetrical in plan and mass, internal function clearly expressed on the outside. The building does demonstrate 5 quoted characteristics, some in part, of: celebrating the potential of new building materials, ornament largely abandoned, careful use of colour on wall surfaces, lightweight construction techniques using modular building components, modern building materials. Two quoted characteristics are noted as not applicable: sun shading devices and murals. This reason is given for rejecting five Heritage Council listing criteria for historic, aesthetic/ technical, research, rarity and representative significance.</p>	<p><u>Modern Movement characteristics</u> The study recognises the diversity of the Modern Movement, as represented by this and other surviving identified examples. It does not identify set Modern Movement characteristics or building features as essential or more important than others for listing. The characteristics referred to by this submission are from the historical overview of the movement in chapter 2 of the study. These characteristics and study chapter were considered in arriving at the recommendation to list this building, together with further detailed assessment. Buildings demonstrate aspects, not every characteristic of a movement. Even the Opera House does not demonstrate all or only the 13 characteristics referenced in this submission. The movement history and characteristics do not assess City buildings for listing, set the requirements or criteria for listing, form part of or override the study conclusions. The criteria for listing are instead set by the Heritage Council. The parts of the study that assess the significance of this building are the recommended listings and inventory. These represent the outcome of the full study process, including a survey of more than 110 comparable buildings in the city and individual assessment of the building's significance under the Heritage Council criteria. This building is assessed as significant for more than Modern Movement features or the facade; also including the historical phase, associations and technical features. A building does not need to conform to all characteristics of a style to satisfy the Heritage Council listing criteria. A building can also be listed for aesthetic distinctiveness or variations, as well as other historic, association or technical values, as with the William Bland Centre.</p>

No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Building type and period</u> Designed in 1956, the building predates the 1957 Act for increased building heights that resulted in a surge of Modern Movement buildings, as noted in the study. It is one of 3 small-scale curtain wall buildings of this period for medical professional rooms in the Macquarie Street precinct. This is unlike the majority of large open-plan buildings that distinguished the Modern Movement buildings identified by TKD in the study. William Bland Centre is essentially a traditional inter-war infill building, with three major lightwells, other than the glass curtain facade. It was developed as company title and converted to strata title. The building does not pass the inclusion threshold for listing for its historic or aesthetic significance.</p>	<p><u>Building type and period</u> The study and planning proposal do not restrict significant examples to buildings constructed after the 1957 Act, taller than 150 feet or with open floor plans. These are only some significant historic phases identified in this study from 1945. The study recognises the diversity of the Modern Movement, as represented by the identified buildings. It does not identify set Modern Movement characteristics or building features as essential or more important than others for listing. Significant characteristics of this building are individually assessed in the study inventory, based on the full study process and Heritage Council listing criteria. The building's period, scale and design for small medical suites are acknowledged in the inventory. These aspects contribute to the building's significance as one of a small extant group of distinct low-scale post-war offices in the city centre, and its association with the medical profession. Another local building of this scale, style and period is listed as state significant; the 1960 Liner House on Bridge Street. The study and planning proposal also include another low-scale curtain wall building at 62 Pitt Street. The submission does not provide substantive new information to overturn the building's assessed historic, aesthetic, association and representative significance.</p>
F1	GBA Heritage for landowner	<p><u>Facade significance</u> The only Modern Movement attribute is the Macquarie Street facade. The curtain wall is a very simple example of the emerging fashion. The construction does not use the prefabricated curtain wall systems with integrated fire-rated spandrels like the MLC building in North Sydney. There is no evidence that this glazed facade was unique or a proprietary system, which often used double glazing or integrated venetian blinds of some post-war buildings. The spandrel panels are fixed to a single brick wall on the edge of the floor slabs for fire protection between levels. The building does not demonstrate prominent three-dimensional characteristics of Qantas House and AMP Circular Quay. The building does not pass the inclusion threshold for listing for its aesthetic or rarity significance.</p>	<p><u>Facade significance</u> The study, planning proposal, Heritage Council listing criteria and Heritage Office guide do not restrict significant examples to particular types of curtain wall design, construction or form. The facade details are acknowledged in the inventory. The extra spandrel wall detail has been added to the inventory. The facade pattern is assessed in the study inventory as unusual and distinctive. Uniqueness is not required to meet the inclusion guidelines for rarity or other criteria. The study recognises the diversity of the Modern Movement, as represented by surviving identified examples. It does not identify set Modern Movement characteristics or building features as essential or more important than others for listing. Significant characteristics of this building are individually assessed in the study inventory, based on the full study process and Heritage Council listing criteria. The building is assessed as significant for more than Modern Movement features or its façade. Of the local examples noted, Qantas House and AMP building are not directly comparable because these are assessed as state significant; a higher level of significance than this building, and with different building forms in response to their corner sites. The state-listed Liner House has a non-three-dimensional form, in response to its similar mid-block location. Docomomo Australia rejects the relevance of a three-dimensional building form in this location and supports the building's aesthetic significance. The submission does not provide substantive new information to overturn the building's assessed aesthetic and rarity significance.</p>

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No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Associations significance</u> The John Bibb association for ownership of the site before the building was constructed does not meet the listing threshold. The building was one of group purpose designed for medical and dental suites in the inter-war and post-war decades close to Sydney Hospital. HP Oser is not regarded as one of the important Modern Movement architects in post-war Sydney. The building does not pass the inclusion threshold for listing for its associations.</p>	<p><u>Associations significance</u> Agree Bibb's association is not sufficiently significant to satisfy the Heritage Council criteria for listing. This association has been removed from the inventory. The submission does not provide substantive new information to alter the study assessment that the building satisfies at least one Heritage Council criteria for its other associations. These include the building design by respected emigre architect, Hans Peter Oser, and association with the medical profession. The study recognises the diversity of the Modern Movement, as represented by surviving identified examples. It is not limited to specific architects. The inventory highlights notable buildings designed by Oser in Sydney during this era. These and the subject building demonstrate Oser was a practicing architect of the Modern Movement. Other submissions highlight that Oser and this building are featured in an article on migrant Modern architecture by Rebecca Hawcroft and in the 2018 Museum of Sydney exhibition. Docomomo Australia rejects the GBA statement that Oser is "not regarded as one of the important Modern Movement architects in post war Sydney". The Heritage Council and Docomomo Australia submissions recognise this building by Oser as a Modern Movement example. The building's medical association is also reflected in its name after an eminent colonial surgeon. The grouping of this building with medical suite buildings of the same era in the Sydney Hospital precinct is part of its assessed significance.</p>

No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Lift slab construction significance</u> Lift slab construction commenced in Australia under licence from the US in 1957. The building is one of at least 23 examples of this construction in Australia and the Pacific region using the lift slab method and therefore is not an important benchmark. Although other examples have since been demolished, evidence of the construction is now buried and inaccessible in the building structure. This construction is well documented in the original engineering drawings in City archives, the US patents and contemporary publications. Quotes two articles from 1957 and 1960 on lift slab construction. Notes that Lift Slab of Australia that constructed the first example in Lidcombe used the same consulting structural engineer of PO Miller Miston & Ferris as William Bland Centre. While now a defunct process, the opportunity remains for its reintroduction. The TKD study does not identify lift slab construction as a characteristic of post-war Modern Movement buildings in Sydney. The building does not pass the inclusion threshold for listing for its research significance.</p>	<p><u>Lift slab construction significance</u> The period of the building and the history of lift slab construction is acknowledged in the inventory. The lift slab construction contributes to the building's assessed significance under three Heritage Council criteria of technical, research and rarity significance. When the building's structure and history are inaccessible or not visible, documentary evidence helps to interpret and understand its significance. Documents are no substitute for the constructed building. The benchmark importance and rarity of this construction is as the oldest known surviving in the local Sydney context. The small number noted in Australia and the Pacific region, before excluding those demolished, suggests this building may be rare in a wider context than assessed. The study recognises the diversity of the Modern Movement, as represented by surviving identified examples. It does not identify set Modern Movement characteristics or specific building features as essential or more important than others for listing. The TKD study includes the inventory for this building which identifies lift slab construction as part of its assessed significance. The submission does not provide substantive new information to overturn the building's assessed technical, research and rarity significance.</p>
F1	GBA Heritage for landowner	<p><u>Social significance</u> The building has some association with medical and dental professions. The connection to the community is primarily through various professional tenants and owner-occupiers. For these reasons, the building does not pass the inclusion threshold for listing for its social significance.</p>	<p><u>Social significance</u> Noted. The building has not been assessed as meeting this criterion in the study report or inventory statement of significance as one of the seven potential Heritage Council criteria for listing. An inconsistency in the inventory for the social significance assessment has been corrected to match the report conclusion for this criterion. The submissions in support of the heritage value and listing of this building from heritage bodies, some owners, professionals and community members may indicate it has potential social significance.</p>

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No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Condition, integrity and upgrades</u> Building condition overall is reasonable. Tenancy suites have been upgraded, fitted with suspended ceilings, undetermined survival of original air conditioning ducts. The Fire Order upgrade outstanding works include engineering alternative solutions and installing fire stopping measures between floors. Facade glazing is likely to be original with 2 reported failures in the last 15 years. Concludes failure of remainder of glass facade panels is low risk with an option to mitigate danger through reinstatement of street awning.</p>	<p><u>Condition, integrity and upgrades</u> City compliance and heritage staff inspected some building interiors and the fire safety order works at the request of owners in April 2019. The City inspection supports the conclusion of this submission about reasonable building condition. This inspection also noted some original internal finishes or features in the common areas and steel windows to the lightwells, and that the constructed fire upgrade works have no or minimal impact on significant features. Details from the submission and City inspection have been added to the inventory. The recommendation to mitigate the low risk of further facade glazing failure through reinstating a street awning is noted, and the management recommendations in the inventory updated to accommodate this advice. The detailed design of an awning to achieve both safety and compatibility with original architectural features can be resolved through the development application process.</p>
F1	GBA Heritage for landowner	<p><u>Excluded buildings</u> The 1951 Berger House identified in the TKD study as the first lightweight metal and glass curtain wall in Sydney, recommended for listing in the study, was excluded from the planning proposal. The City's further criteria for inclusion in the planning proposal are quoted. Also refers to the Modern Movement characteristics identified in the study report.</p>	<p><u>Excluded buildings</u> The exclusion of Berger House is acknowledged in the pre-exhibition report, as part of the City's investigation to select buildings for the current planning proposal. All buildings have been impartially assessed using the criteria and process set out in the reports before exhibition. In addition to the study assessment, the City reviewed all study recommended buildings against three additional criteria to establish that their assessed significance can still be reasonably appreciated. The criteria includes buildings having sufficient integrity, comparative value within the local area, and a significance that is maintained in approved or advanced plans. The Modern Movement characteristics from the study historic overview, referenced by this submission, are not criteria for the study assessment or City review. The City review found that the William Bland Centre, together with other accomplished examples of this type and period, met the noted criteria for inclusion in the planning proposal for further review through public exhibition. Council provided its records of the early study identification process and the City's pre-exhibition review to these owners in response to an information request. These document the consistent identification and selection of this building through the TKD study and City review process. Berger House and other excluded examples have not been reviewed further at this stage, as they are not part of the subject planning proposal.</p>

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No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Study update</u> Council's substitution of the updated heritage study report and inventory is a gross failure of process and procedural fairness. The study and inventory additions state criteria are satisfied and are an attempt by Council to reinforce the validity of the analysis by TKD for the nominated buildings.</p>	<p><u>Study update</u> The March 2019 updates to the study report and inventories were requested by the Department of Planning Industry and Environment before issuing its gateway determination for the public exhibition. The minor updates are for greater clarity and do not alter the proposed listings or add substantive new information. These specify the Heritage Council criteria satisfied based on the previous TKD assessment of significance contained in the inventories first reported to Council on 6 August 2018. The public exhibition is the stage when owners and the community are formally consulted and invited to review and comment on the proposal, based on the approved information. The public exhibition began on 19 August 2019. City staff notified interested landowners about the updates 4 weeks before exhibition, on 22 July 2019, and responded to owner requests and enquiries about the updates. Copies of the updated study report and inventories were provided to owners at the public exhibition stage, as required. The public exhibition was extended beyond the required 28 days to 2 months to ensure owners had the opportunity to review and comment on the proposal, as updated. It is noted that this submission, prepared before the public exhibition, has taken the opportunity provided to highlight and review the updated study and inventory on behalf of the landowner. This submission was also exhibited with the planning proposal.</p>

No.	Submitter ¹	Submission summary	Submission response
F1	GBA Heritage for landowner	<p><u>Conclusions</u> On the basis of additional research and renewed heritage assessment findings, this objection recommends the William Bland Centre is deleted from the planning proposal.</p>	<p><u>Conclusions</u> The submitted research has been considered and the building inspected. The GBA submission does not dispute the assessed originality, features or history of this building, and accepts it demonstrates some Modern Movement characteristics. The objection misinterprets the study and planning proposal as limited to specific Modern Movement characteristics from the historical overview in chapter 2 of the study report. These characteristics and study chapter were considered in arriving at the recommendation to list this building, together with further detailed assessment. The GBA threshold of 13 essential defining characteristics would prevent listing the Sydney Opera House as a Modern Movement example. The study and planning proposal recognise the diversity of the Modern Movement, as represented by this and other identified buildings. They do not identify set Modern Movement characteristics or building features as essential or more important than others for listing. Significant characteristics of this building are individually assessed in the inventory, based on the full study process and Heritage Council listing criteria, rather than the movement history or set characteristics. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. This building is assessed as significant for more than Modern Movement features. 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 assessed local significance of the building under six criteria is supported for its historic, associations, aesthetic/ technical, research, rarity and representative value. The building therefore warrants listing as a local heritage item. As a result of the post-exhibition City review, it is recommended that the proposed item name for the building including "significant interiors" is revised to specify the "façade wall and fixtures, foyers, lightwells and internal structure." This excludes non-structural tenancy interiors from the listing. The inventory has been updated to reflect this post-exhibition review.</p>
F2	MinterEllison for landowner	<p>Oppose. Their firm acts for the Body Corporate Services, representing the owners and residents of the William Bland Centre. Issues outlined below.</p>	<p>Objection noted and issues responded to below.</p>

No.	Submitter ¹	Submission summary	Submission response
F2	MinterEllison for landowner	<p><u>Listing justification</u> Clearly and beyond question, this building does not sufficiently exhibit the Modern Movement characteristics identified in the TKD study, or the Heritage Council criteria to warrant listing. Listing is unjustified. MinterEllison engaged Graham Brooks and Associates (GBA) on behalf of the owners to provide expert heritage advice. This heritage report uses the same approach taken in the TKD study and inventory and also took into account additional information revealed during further research and site inspection. Comments and conclusions from the GBA report are quoted.</p>	<p><u>Listing justification</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, in accordance with the Heritage Council criteria and supporting Heritage Office guide. The study identifies this building as worthy of local listing. The study concludes the building fulfils 6 Heritage Council criteria for local listing. The building is assessed as significant for more than Modern Movement features or its facade; also including the historical phase, associations and technical features. The GBA submission was included in the exhibition and has been considered in detail above. This accepts the building demonstrates some Modern Movement characteristics. It does not provide substantive new information to overturn the study assessment. The objection misinterprets the study and planning proposal as limited to specific Modern Movement characteristics from the movement historical overview. These characteristics and study chapter were considered in arriving at the recommendation to list this building, together with further detailed assessment. The study and planning proposal recognise the diversity of the Modern Movement, as represented by this and other identified surviving buildings. They do not identify set Modern Movement characteristics or building features as essential or more important than others for listing, as suggested by GBA. Significant characteristics of this building are individually assessed in the inventory, based on the full study process and Heritage Council listing criteria, rather than the movement history or set characteristics. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example.</p>
F2	MinterEllison for landowner	<p><u>Study update and copies</u> A copy of the updated TKD Study, including inventory data sheets, was not exhibited on Council's website, on the Department of Planning & Environment's (DPE) Gateway Proposal webpage, nor was a copy provided to the owners until after the updated reports were identified in the DPE Gateway Determination report and a copy was requested from Council on 22 July.</p>	<p><u>Study update and copies</u> The public exhibition is the stage when owners and the community are formally consulted and invited to review and comment on the proposal, based on the information approved by the Department in its gateway determination, issued on 10 July 2019. The public exhibition began on 19 August 2019. City staff notified interested landowners about the updates 4 weeks before exhibition, on 22 July 2019, and responded to owner requests and enquiries about the updates. Copies of the updated study report and inventories were provided to owners at the public exhibition stage, as required. The public exhibition was extended beyond the required 28 days to 2 months to ensure owners had the opportunity to review and comment on the proposal, as updated. It is noted landowners' heritage assessment highlights and review the updated study and inventory on behalf of the landowner. This assessment was also exhibited with the planning proposal. The March 2019 updates to the study report and inventories were requested by the Department of Planning Industry and Environment before issuing its gateway determination for the public exhibition. The minor updates are for greater clarity and do not alter the proposed listings or add substantive new information.</p>

No.	Submitter ¹	Submission summary	Submission response
F2	MinterEllison for landowner	<p><u>Fire order works</u> The William Bland Centre is concerned unnecessary development constraints will seriously compromise the ability to implement and undertake further assessment of works required as part of the fire order. The works for the fire order may severely diminish any potential cultural heritage significance. Also makes reference to commercial operations, noted below.</p>	<p><u>Fire order works</u> Listed buildings can still be upgraded to meet current safety, fire and other building standards. City staff met with owners to discuss these matters, inspected the building, and reviewed the 2016 fire order and landowners' condition reports from Surface Design and GBA. City heritage and fire order specialists have conferred and together inspected the building interiors and constructed fire upgrade works. This City review finds no conflict between the fire safety order and listing for the William Bland Centre. The completed and remaining fire order works have no or minimal impact on significant features, including the building facade, foyers and structure. These fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. The fire order process considers the impact of works on the significance of heritage items. Alternatives to major demolition or other heritage impacts can be found through this process, using the Building Code of Australia's non-prescriptive performance measures of 'alternate solutions', such as through sprinkler systems. Owners have engaged a fire engineer to develop such a solution. The GBA heritage submission for the owners notes the fire order works, reasonable building condition, and that remaining fire upgrade works include investigating fire engineered alternate solutions and installing fine grained fire stopping measures between floors. The heritage submission does not indicate that the fire order or building condition require substantial demolition or will diminish significance. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.</p>

No.	Submitter ¹	Submission summary	Submission response
F2	MinterEllison for landowner	<p><u>Development and commercial operations</u> Unnecessary development constraints will seriously compromise the ability to maintain commercially viable operations for the site. Also makes reference to the fire order.</p>	<p><u>Development and commercial operations</u> Non-structural tenancy interiors are excluded from the revised heritage item 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>City staff met with owners to discuss these matters, inspected the building and considered the landowners' submitted reports. Listed buildings can still be repaired, upgraded to meet current standards and developed. Other listed modern office buildings, including Transport House on Macquarie Street and Australia Square, have maintained building standards, operations and their significance. This planning proposal makes no change to the zoning or development standards for the site.</p> <p>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. The 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, provides clarity and certainty. The application documents are unchanged because a heritage impact statement is already required for buildings of this age. The fire order issue is responded to above. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Owners are encouraged to arrange pre-application meetings with City planners to gain greater certainty about development plans.</p>

No.	Submitter ¹	Submission summary	Submission response
F3	Surface Design Pty Ltd for landowner	<p><u>Facade design life, performance and safety</u> They have reviewed the current performance of the building fabric. Modern buildings have a specified design life of 25 to 50 years. The resource consumption, occupant health, safety and integrity is compromised by the building age, as well as the improved materials and construction methods now used. The building fabric is a low performer when compared to modern NCC/ BCA compliance requirements. The facade glazing complies for strength and deflection BCA standards. It does not meet BCA standards for wind loads, deflection requirements, thermal transmission, solar radiation (overheating). It is unlikely to meet the BCA requirement for air infiltration based on reported noise, not confirmed through testing. Further issues include: public safety from 2 reported failed glazing falls in the last 15 years, possibly related to the fully tempered or toughened glass; and water ingress affecting amenity. The minimal intervention option is to replace facade seals and add sealing to mitigate leakage, with reduced cost and disruption to tenants, to partially addresses key minimum performance requirements, however defects may reoccur. Moderate intervention option is to replace glazing, seals, strengthen frames and add insulation to address most performance issues. Recommend high intervention option for full facade replacement for a frame design life of at least 25-years, uniform appearance, to meet energy, work health and safety requirements.</p>	<p><u>Facade design life, performance and safety</u> Information noted. All buildings need ongoing maintenance and repair for their continued use. Listed buildings can still be upgraded to meet current building standards. Other listed modern office buildings of this period have maintained building standards, operations and their significance. Current material specifications for design life is not a measure for the lifespan or condition of these building materials from a different era. The report notes further survey is needed to understand the facade longevity.</p> <p>The main identified effect in this report from material failure associated with design life is costly repairs, managed by regular inspection, maintenance and repair. Glass fall is the only safety risk identified by Surface Design, which GBA concludes is low risk, and both recommend mitigating with an awning. The GBA submission notes the building's condition as reasonable. It is noted Surface Design provides an option to address the identified performance issues while retaining the façade, through repair and improved sealing, or alternatively added strengthening, insulation and new glazing.</p> <p>It is most appropriate to consider and address the identified performance issues at the development application stage when a detailed proposal is prepared. The development assessment process for heritage items enables the form of development to be determined in response to the individual building features and circumstances, while also retaining significance. The views and issues of owners and their consultants 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.</p> <p>Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' Owners are encouraged to arrange pre-application meetings with City planners to gain greater certainty about development plans and the most streamlined assessment process.</p>
F4	Strata Plan Committee Chairman	<p>Oppose. The building should be eliminated as an item of heritage significance in the proposal of the Modern Movement as identified by the City of Sydney Council.</p>	<p>Objection noted and responded to below.</p>

No.	Submitter ¹	Submission summary	Submission response
F4	Strata Plan Committee Chairman	<p><u>Facade issues</u> Refers to Surface Design report on the façade, which identifies problems. The façade has exceeded a design life expectancy according to industry specifications for materials and strength. It has structural and material integrity problems displaying significant deterioration that cannot be repaired. The facade is a safety risk to both the occupants and the public at large. It does not comply with today's minimum standard performance and building codes. The glass does not meet load requirements according to the code with continuing risk of glass failure and public risk. The aluminium framework for the existing façade does not meet minimum strength requirements which has caused buckling in certain areas, which questions the design and longevity of the existing façade. The existing façade was constructed from cheap materials of aluminium and single glazed glass system with poor thermal performance.</p>	<p><u>Facade issues</u> All buildings need ongoing maintenance and repair for their continued use. Listed buildings can still be upgraded to meet current building standards. The Surface Design and GBA reports for landowners on the façade condition and safety issues are considered and responded to in more detail above. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.</p> <p>It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' Owners are encouraged to arrange pre-application meetings with City planners to gain greater certainty about development plans and the most streamlined assessment process.</p>
F4	Strata Plan Committee Chairman	<p><u>Alterations</u> The façade has been altered significantly in an attempt to address water leakage, thermal performance, air infiltration and structural deficiency.</p>	<p><u>Alterations</u> City staff inspected the building and considered the landowners' submitted reports from Surface Design and GBA on the building condition and integrity. The building alterations are acknowledged in the inventory. The building retains its original construction, form, facade, internal configuration, lightwells with steel windows, marble cladding, foundation stone and plaque in the ground floor foyer and some timber joinery in upper level foyers, with minor alterations. This review and inspection confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. The building's significance, as assessed by the heritage study, can still be reasonably appreciated.</p>

No.	Submitter ¹	Submission summary	Submission response
F4	Strata Plan Committee Chairman	<p><u>Fire order works and safety</u></p> <p>The fire order works are not yet complete. The fire order states this building: "the design of the spandrels at the front of the building may not be of a suitable form of construction to prevent the spread of fire from one floor to floors above, which could result in the rapid spread for fire throughout the building." Fire safety and public safety must override the subjective aesthetic considerations in the City's heritage proposal. All the issues relevant to fire safety must be resolved before any other matters. The heritage proposal is premature. The building is not fine or well-built as proposed by the listing. The owner reports identify defects and call for major remedial works to make the building safe, as supported by the observations in Council's fire order.</p>	<p><u>Fire order works and safety</u></p> <p>The fire upgrade works have progressed since the 2016 fire order. These works are considered in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety.</p> <p>The Surface Design and GBA reports on the façade condition and safety issues are considered and responded to above.</p>
F5	Stephen Nikolovski, Nikolovski Investment Fund Pty Ltd, Lot owner	<p>Oppose. As an owner, they respond to the central assertion that the William Bland Centre is significant in the modern movement when considering the other buildings in the list. Notes issues that will be raised in other owner submissions of the fire order, building condition and refurbishment, cost of maintaining the façade, impacts on the ownership group. The building differs to the true modernist, Harry Seidler's work. Seidler's works were forward thinking, high quality materials and spaces, durable, had strong modernist or Bauhaus concepts, allowed natural light, like an artwork. The MLC Centre is a strong example, unlike the William Bland Centre. The William Bland Centre uses a since unused design style by a comparatively unheard-of architect, with thrift, requiring numerous subsequent internal renovations. The design does not display principals or characteristics of the modern movement like the MLC Centre does, is relatively unremarkable, poorly lit and not particularly modernist. In fact, the only real part the building fits the Council objectives is its period, otherwise it may as well be any office tower in the Sydney basin. It is for this central reason that COS should scrap the listing of William Bland Centre Don't put further strain on the owners and remove the heritage listing on the William Bland Centre.</p>	<p>Objection noted. It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The study identifies this building as worthy of local listing as a city example of the Modern Movement of local heritage significance, based on a survey of more than 110 comparable buildings in central Sydney and further detailed assessment. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The design, construction and materials are acknowledged in the inventory. The study recognises the diversity of the Modern Movement as represented by this and other identified buildings. Seidler and other architects and buildings of different design and construction are included. The study notes the use of artificial as well as natural lighting. The MLC Centre is assessed as state significant; a higher level of significance than required for local listing. The study does not identify set Modern Movement characteristics or building features as essential or more important than others for listing. Some public submissions also support this listing. 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. City staff will continue to assist owners with advice on the development process.</p>

No.	Submitter ¹	Submission summary	Submission response
F6	Lot owner	Oppose. Strongly oppose any listing of the William Bland Centre, as a suite and business owner in the building. Reasons outlined below.	Objection noted and responded to below.
F6	Lot owner	<u>Upgrades and development</u> As the contracted plumber of WBC, they have every reason to believe this will impose many unreasonable and costly impositions on any upgrade and development of the building that may be done to improve property values, building safety and amenity. Building concerns include exposed pipes and wires running through the common property. The façade has extensive structural and leakage problems on rainy days. The building is subject to a fire order from the Council of which the final design is yet to be settled and that design may further impact on the building requiring demolition.	<u>Upgrades and development</u> City staff met with owners to discuss these matters, inspected the building and considered the landowners' consultant reports and submissions from Surface Design, GBA and MinterEllison. The upgrade and development of this building is addressed above in the response to the Surface Design and MinterEllison submissions. Listed buildings can still be repaired, upgraded to meet current standards and developed. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. For development applications, the documents are unchanged because a heritage impact statement is already required for buildings of this age. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. Listing this building gives its owners an option to recoup upgrade costs through a heritage floor space award. City staff will continue to assist owners with advice on the development process.
F6	Lot owner	<u>Landowners' heritage assessment</u> Refer to the extensive GBA heritage submission, additional research and findings prepared on behalf of the building proprietors. Urge Council to remove William Bland Centre from the planning proposal.	<u>Landowners' heritage assessment</u> City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The additional assessment has been addressed in detail above against the submission. The GBA submission does not provide substantive new information to overturn the study assessment. As a result of the post-exhibition City review, the extent of listing has been revised and the inventory updated.
F7	Shweta Arora, Lot owner	Oppose. Strongly object to listing William Bland Centre for the reasons outlined below.	Objection noted and responded to below.

No.	Submitter ¹	Submission summary	Submission response
F7	Shweta Arora, Lot owner	<p><u>Significance</u> It does not meet any of the criteria thresholds and therefore should not be heritage listed. It is not “most significant” for the Modern Movement in NSW, “designed and built to a very high standard”, “outstanding architectural and civic accomplishment” or “exceptional architectural quality”. The original architect used conventional building methods of brick and steel, not the new materials of reinforced concrete, aluminium, internal open design and double glaze glass windows. Therefore, it does not meet the criteria for a modern movement building.</p>	<p><u>Significance</u> The study and planning proposal recognises the diversity of the Modern Movement, as represented by this and other identified buildings. They do not identify set Modern Movement characteristics or building features as essential or more important than others for listing. The quoted comments refer to the Modern Movement period generally, which also includes buildings with greater than local significance required for local listing, such as the world-heritage listed Sydney Opera House. These do not relate to every building and do not set listing requirements. Outstanding or exceptional 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. The parts of the study that relate directly to the assessed significance of this building are the recommended listings and the inventory for this building. These represent the outcome of the full study process, including a survey of more than 110 comparable buildings in the city and further detailed assessment. The study identifies this building as worthy of local listing, fulfilling six Heritage Council criteria. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example.</p>
F7	Shweta Arora, Lot owner	<p><u>Condition and fire order</u> The building has significant structural defects, a facade with extensive leakage problems and a fire order imposed by the same Council department. Listing would significantly delay rectification. As a new owner having completed a recent fit out, they experienced significant delays and financial costs due to the fire order. The final design of the fire order is yet to be determined and the design may require demolition of some aspects that the heritage proposal seeks to preserve. Public safety is of paramount concern for business owners and the general public and must take precedence over the cosmetic appeal of preserving an inappropriate and unworthy building.</p>	<p><u>Condition and fire order</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners’ consultant reports and submissions from Surface Design, GBA and MinterEllison. Listed buildings can still be repaired, upgraded to meet current standards and developed. The façade condition, safety, fire order and development issues are addressed above in response to the Surface Design, GBA and MinterEllison submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. Listing this building gives its owners an option to recoup upgrade costs through a heritage floor space award. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. City staff will continue to assist owners with advice on the development process.</p>

No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	Oppose. As a lot owner, object for the reasons outlined below.	Objection noted and responded to below.
F8	Jane Pistoiese, Lot owner (23/9/19)	<u>Landowners' heritage submission</u> Please review the GBA heritage submission prepared for the strata committee. This states that "in terms of this objection, the author continues to maintain that the William Bland Centre does not meet any of the criteria thresholds and therefore should not be listed" referencing TKD's final reports, 2018 and 2019. This greatly conflicts with Council's expert report by TKD final report.	<u>Landowners' heritage submission</u> City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The additional assessment has been addressed in detail above against the submission. The GBA submission does not provide substantive new information to overturn the study assessment. As a result of the post-exhibition City review, the extent of listing has been revised and the inventory updated.

No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	<p><u>Significance</u> How can Council say that the William Bland Centre fits Council and TKD's criteria for: "20th Century's Most Significant Modern Movement Buildings", "designed and built to a very high standard", "outstanding architectural and civic accomplishments", and "exceptional architectural quality". The building has none of the defining elements quoted in Council's Reports i.e. "most significant", "designed and built to a very high standard", "outstanding architectural and civic accomplishments" and "exceptional architectural quality".</p>	<p><u>Significance</u> It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff met with owners, inspected the building, and reviewed the study and submissions in order to review this proposal. The study recognises the diversity of the Modern Movement, as represented by this and other identified buildings. It does not identify set Modern Movement characteristics or specific building features as essential or more important than others for listing. The quoted comments refer to the Modern Movement period generally, which also includes buildings with greater than local significance required for local listing, such as the world-heritage listed Sydney Opera House. For instance, the study and Council report note "the Modern Movement produced some of the twentieth century's most significant architecture." The quoted comments do not relate to every building and do not set the requirements or criteria for local listing. The criteria for local listing are set by the Heritage Council. Outstanding or exceptional examples would meet the criteria for higher levels of listing as state, national or world heritage. The parts of the study and proposal that relate directly to the assessed significance of this building are the recommended listings and the inventory. These represent the outcome of the full study process, including a survey of more than 110 comparable buildings in the city and further detailed assessment. The study identifies this building as worthy of local listing, fulfilling six Heritage Council listing criteria. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The building's construction and materials are acknowledged in the inventory. 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>

No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	<p><u>Listing assessment and excluded buildings</u> Under TKD's final report of January 2018, the WBC would not be listed and the removal of Berger House, Christie Centre, Domain Parking Station, Standard Chartered House and the Supreme Court Hospital Road Court Complex without being subject to any of the 7 heritage assessment criteria demonstrates that it is a selective process not based on merit. It needs to be explained to the lot owners of the William Bland Centre how Council removed 5 buildings from the heritage list. These buildings were never subjected to the 7 NSW heritage assessment criteria to allow them to be removed. How could they have failed to meet any of the criteria if they were not applied to these said 5 buildings to determine whether they were suitable for listing. The William Bland Centre only needs to meet 1 criteria.</p>	<p><u>Listing assessment and excluded buildings</u> All buildings have been impartially assessed using the criteria and process set out in the Council reports before exhibition. The study identifies this building as worthy of local listing for the criteria and qualities outlined above. Before exhibition, for inclusion in the planning proposal, the City reviewed all study recommended buildings against three additional criteria to establish that their assessed significance could still be reasonably appreciated. The criteria includes buildings 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 that this building met these additional criteria, together with other accomplished examples of its type and period, whereas the 5 excluded buildings did not. Council provided its records of the early study identification process and the City's pre-exhibition review to these owners in response to an information request. These document the consistent identification and selection of this building through the TKD study and City review process. The proposal has been reviewed again following exhibition.</p>
F8	Jane Pistoiese, Lot owner	<p><u>Architect</u> How can you list on the basis of the architect when there is no supporting documentation that Hans Peter Oser formed part of the history of modernist architecture in Sydney. The William Bland Centre and its architect are not associated with the Modern Movement. Council's assessment only states he is Austrian and successful, not significant. A reference by Rebecca Hawcroft from Godden Mackay Logan titled "Migrant Architects Practicing Modern Architecture in Sydney, 1930-1960" is quoted as "Despite their sustained success and continual presence in the press the firm Oser and Fombertaux are not mentioned in any history of modernist architecture in Australia."</p>	<p><u>Architect</u> The documentation to support the listing is the heritage study and inventory. The inventory highlights notable buildings designed by Oser in Sydney during this era. These and the subject building demonstrate Oser was a practicing architect of the Modern Movement. The quoted Hawcroft article identifies Oser as a migrant architect in Sydney and continues "competent practitioners of modernist architecture, like many of the migrant architects, they have slipped from view in the reflections of the growth of modernism in Sydney in the post war period." Hawcroft concludes "This architecture is 'un-loved' in that it is largely unknown, un-listed and generally absent from histories...it is important to acknowledge that there were a great many architects with authentic European modernist architectural training active within Sydney designing, commentating and contributing to the development of modern architecture in the post war period." This listing proposal seeks to do so. The GBA heritage submission for landowners acknowledges this building demonstrates some Modern Movement characteristics. Docomomo Australia, an advising organisation to UNESCO on modern architectural heritage, rejects the GBA statement that Oser is "not regarded as one of the important Modern Movement architects in post war Sydney." The Heritage Council and Docomomo Australia submissions recognise this building by Oser as a Modern Movement example.</p>

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No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	<p><u>Building period, height and comparisons</u> The Development Application was lodged in 1956 before the 1957 ACT which enabled the Modern Movement and it is widely acknowledged that “it was adopted by Australian architects during the 1960s” quoted from another reference. The William Bland Centre cannot be in the same category as the MLC, Masonic Centre, Town Hall House, St Julian’s Church, nor the Former County Council with their large stand-alone concrete structures.</p>	<p><u>Building period, height and comparisons</u> The study and planning proposal do not restrict significant examples to buildings constructed after the 1957 Act, taller than 150 feet or concrete construction. These are only some significant historic phases identified in this study from 1945. The study does not indicate that this Act enabled the Modern Movement which began before 1957. The study recognises the diversity of the Modern Movement, as represented by this and other identified buildings. It does not identify set Modern Movement characteristics or specific building features as essential or more important than others for listing. Instead, significant characteristics of this building are individually assessed in the inventory. The study identifies this building as worthy of local listing as a city example of the Modern Movement of local heritage significance. The building period, height and construction are acknowledged in the study inventory for the building. These aspects contribute to the building's significance as one of a small extant group of distinct low-scale post-war offices in the city centre. A similar building of this scale, style and period in the local area is listed as state significant; the 1960 Liner House on Bridge Street. The study and planning proposal include other low-scale curtain wall buildings of this period including Liverpool & London & Globe and Horwitz House.</p>
F8	Jane Pistoiese, Lot owner	<p><u>Study update notification</u> Owners were not advised that the final report of January 2018 and Council’s Inventory dated the 10 May 2018 have both been updated as required. Is Council suggesting that it is the owner’s responsibility to know that TKD revised their final issue again in March 2019 when, I understand, that final means final. They have only been directed to the website.</p>	<p><u>Study update notification</u> This matter is considered and responded to above in the response to the MinterEllison and GBA submissions for landowners. Copies of the study report and inventories were provided to owners at the public exhibition stage, as required, through the City website and One Stop Shop, and interested landowners notified 4 weeks prior. The exhibition was extended to 2 months to ensure owners had the opportunity to review and comment on the proposal, as updated. The GBA heritage assessment reviews the updated study and inventory on behalf of the landowner and was included in the public exhibition.</p>

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No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	<p><u>Study and inventory update</u> The Department's requested amendment confirms that the TKD January 2018 final report was lacking substance and was inconclusive. Council and TKD's "cut and paste" from the inventory and added generalised comments did not enhance the material to justify listing the William Bland Centre. Inserting "meets this criterion at a local level" has misled those who are approving this listing. The added comment in the study report of "Most evident in extant original external and internal fabric" is generalised with no additional assessment or research. To subsequently add to the inventory that it "meets this criterion at a local level" is unfair. Identifies a contradictory statement in the inventory for social significance. This document been manipulated to suit Council's agenda and does not rely on further research. Quotes the GBA heritage submission that "The substitution of the key reference documents...can be regarded as a gross failure of process and procedural fairness".</p>	<p><u>Study and inventory update</u> This matter is considered and responded to above in the response to the MinterEllison and GBA submissions for landowners. The March 2019 updates were requested by the Department of Planning Industry and Environment for greater clarity and do not alter the proposed listings or add substantive new information. The study report and inventories were exhibited in August-October 2019 for public comments, based on the final versions approved in the Department's Gateway determination of July 2019.</p> <p>The updates specify the Heritage Council criteria satisfied based on the previous TKD assessment of significance contained in the inventories first reported to Council on 6 August 2018 and approved by Council and Central Sydney Planning Committee in October 2018. The research for this study assessment was completed by January 2018. The identified inconsistency in the inventory for social significance has been corrected to match the report conclusion and statement of significance in the inventory.</p>
F8	Jane Pistoiese, Lot owner	<p><u>Gateway determination report exhibition</u> The Gateway determination report was not put online. How can Council not regard this "as the full supporting documents" which required it to be placed online as requested by the DPIE.</p>	<p><u>Gateway determination report exhibition</u> The Department's Gateway determination letter and other information for Council's planning proposal were included in the Council's public exhibition as required. The Gateway assessment report does not form part of Council's planning proposal or supporting justification. The Department placed its Gateway assessment report on the its own website. City staff gave owners links to the Department's website to access this information on request.</p>

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No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	<p><u>Significant interiors inclusion</u> "Significant interiors" were never included and she first detected it in the Gateway determination report. Council advised that the words "significant interiors" is in the planning proposal table and not the text. How would she have known to look in the table and not the text? There has been no formal notification to the owners that "significant interiors" are included in the proposed listing. There is no supporting documentation to support the proposition that "significant interiors" should be included in the listing. The GBA heritage submission does not reference "significant interiors" because it was not in the TKD final report of January 2018 or final report of March 2019, and only placed in the table of Council's planning proposal.</p>	<p><u>Significant interiors inclusion</u> The inclusion of interiors is described in the pre-exhibition reports to Council and Central Sydney Planning Committee of August and October 2018, in the planning proposal and inventory. The planning proposal and inventory were exhibited for comment. The listing of interiors is described in the body of the reports, planning proposal and inventory, as well as the planning proposal table. In August 2018, Council's notification letter to landowners highlights that the planning proposal identifies significant components in the item name and that these will be reviewed through the next planning proposal stages. City staff inspected the building interiors with landowners, met with landowners to discuss the listing and answer questions and considered all submissions. As a result of the post-exhibition City review, it is recommended that the proposed item name for the building including "significant interiors" is revised to specify the "façade wall and fixtures, foyers, lightwells and internal structure." This excludes non-structural tenancy interiors from the listing. The inventory has been updated to reflect this post-exhibition review.</p>
F8	Jane Pistoiese, Lot owner	<p><u>Inventory comprehensiveness</u> The inventory states "Heritage Inventory sheets are often not comprehensive and should be regarded as a general guide only" and yet Council, TKD and the DPIE found them acceptable to enhance the TKD final report January 2018 to allow this building to meet the criterion at a local level.</p>	<p><u>Inventory comprehensiveness</u> The inventory is non-statutory and provides the assessment of significance of buildings in accordance with the Heritage Council criteria and supporting Heritage Office guide to support the listing proposal. The 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 quoted standard comment is included in all inventories. It also states that inventory sheets continue to be updated and that further research is recommended as part of the preparation of development proposals so that the significance of heritage items can be fully assessed prior to submitting development applications.</p>
F8	Jane Pistoiese, Lot owner	<p><u>Building photographs</u> Object to the photographs of the William Bland Centre as enhanced with colour not representing the true and natural visual appearance of the building.</p>	<p><u>Building photographs</u> Objection noted. The photographs included in the inventory and Council reports are as true and clear an illustration of the building as possible and, to City staff knowledge, have not been recoloured.</p>

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No.	Submitter ¹	Submission summary	Submission response
F8	Jane Pistoiese, Lot owner	<p><u>Building condition</u> Quotes extracts of the TKD study report on building construction difficulties for Modern Movement buildings. The deteriorating façade with 2 panes of glass falling out of the aluminium frames, difficulty in sourcing the glass for the windows, weathering and staining on the façade's surfaces and the building is not earthquake safe has put this building into TKD's assessment that "Difficulties arise in various areas" and this comment needs to be recognised by Council. The rain in Sydney during the week of the 16th to 19th of September 2019, caused significant water leakage problems with our façade.</p>	<p><u>Building condition</u> City staff met with owners to discuss these matters, inspected the building, and considered the landowners' submitted condition reports from Surface Design and GBA. The façade condition and safety issues are considered above in response to these submissions. Listed buildings can still be repaired and upgraded to meet current building standards. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. 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. It is most appropriate to consider and address the identified performance issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p>
F8	Jane Pistoiese, Lot owner	<p><u>Fire order</u> There are 70 owners in our Strata Plan who are dealing at the same time with a fire order imposed on the building and this additional heritage listing proposal has placed an enormous strain on the strata committee and lot owners. Has Council considered the implications of a fire order and heritage listing for the owners of the William Bland Centre?</p>	<p><u>Fire order</u> The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety.</p>
F9	Anthony Pistoiese, Lot owner	<p>Oppose. As a lot owner, object for the reasons outlined below. The William Bland Centre should be rejected from heritage listing and deleted from the planning proposal.</p>	<p>Objection noted and responded to below.</p>

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No.	Submitter ¹	Submission summary	Submission response
F9	Anthony Pistoiese, Lot owner	<p><u>Landowners' heritage submission</u></p> <p>There is insufficient evidence that the WBC demonstrates a fine example of the architectural style representative of the Modern Movement studied for Central Sydney.</p> <p>The TKD heritage study and landowners' heritage submission from GBA demonstrate widely opposing assessments, which cannot be ignored and requires further independent investigation. The whole premise that the WBC is worthy of heritage listing and represents a fine example of the Modern Movement should be rejected. GBA's submission is well investigated and independent, which opposes the heritage listing on all 7 criteria of significance.</p>	<p><u>Landowners' heritage submission</u></p> <p>The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F9	Anthony Pistoiese, Lot owner	<p><u>Further review</u></p> <p>In the real estate article by Sue Williams on 13 September 2019, John Oultram stated that where there were conflicting heritage reports, the council might opt to have the reports peer reviewed or bring in other experts to find the balance. In the same article Andrew Woodhouse stated Council should now set aside the proposals with objections to undertake further analysis based on the new evidence. Good heritage planning requires certainty, consistency and clarity.</p>	<p><u>Further review</u></p> <p>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. This building is identified for listing based on an independent heritage study and individual heritage assessment, in accordance with the Heritage Council criteria and Heritage Office guide. City staff reviewed this 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. Council included the owners' heritage submission in the public exhibition. City staff considered all owner and other submissions, including the GBA heritage submission, met with owners and inspected the building in order to review this proposal following public exhibition. Submissions have also been received in support of listing. As a result of the post-exhibition City review, the listing has been revised and inventory 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>

No.	Submitter ¹	Submission summary	Submission response
F9	Anthony Pistoiese, Lot owner	<p><u>Study and inventory update</u> DPIE state in the Gateway determination report that TKD “finalised the comprehensive heritage study in 2018” so there was no need for further revision. The update was needed to strengthen its argument. The updated report inserts a table for how the 9 proposed items meet the NSW Heritage assessment criteria and excludes the previous chronology appendix. Why was it necessary to alter the inventories when produced according to Government application protocol? Quotes the GBA submission that this is a “gross failure of process and procedural fairness on the part of Council” and heritage listing the WBC should be rejected. The March 2019 study report refers to the planning proposal when it is Council's responsibility to publish the planning proposal rather than TKD. It appears Council's planning proposal of August 2018 had pre-determined the 9 items it wanted before the TKD report update of March 2019.</p>	<p><u>Study and inventory update</u> This matter is considered and responded to above in the response to the MinterEllison and GBA submissions for landowners. The final study report and supporting inventories exhibited in August-October 2019 for public comment were the final versions approved as part of the Department of Planning Industry and Environment's Gateway determination in July 2019.</p> <p>The March 2019 updates to the study report and inventories were requested by the Department, as noted in the study report, before the Department issued its Gateway determination for exhibition of the planning proposal. The minor updates are for greater clarity and do not alter the proposed listings or add substantive new information. The updates specify the Heritage Council criteria satisfied based on the previous TKD assessment of significance contained in the inventories first reported to Council on 6 August 2018.</p> <p>The study update refers to the planning proposal because the planning proposal was approved by Council and Central Sydney Planning Committee the previous year and is the reason for the update. The chronology appendix is retained in Council's records.</p>
F9	Anthony Pistoiese, Lot owner	<p><u>Updated inventory assessment</u> The inventory states the building meets 6 criteria when previously it was assessed as having 'some' historic significance. This is a pure fabrication of evidence. This assertion of some historical significance is questionable and refuted in GBA's assessment. Upscaling the assessment of “some historical significance” to satisfying six of the Heritage Council criteria in the following version of the inventory. This is manifestly unfair and dishonest.</p>	<p><u>Updated inventory assessment</u> The assessment finding that this building meets 6 Heritage Council criteria for local listing, including some historic significance, is unchanged in the update. The update specifies the Heritage Council criteria satisfied based on the previous TKD assessment of significance. The reason given for its historic significance is unchanged for "its intermittent and then continuous association with the medical profession and provides evidence of the importance of the locality to the profession because of its proximity to Sydney Hospital". The GBA submission for the landowner has been considered, as noted above.</p>
F9	Anthony Pistoiese, Lot owner	<p><u>Study versions</u> A 'final' version of the report in 2014 is not publicly available to see changes made between in the final issues of January 2018 and March 2019. When a final report issue can be revised several times, it raises suspicion these are being unfairly manipulated. The reports from TKD and the Council have been revised and altered several times so that the 9 listed items could meet the heritage significance criteria that it demonstrates an unfair and unjust process. The TKD study cannot be accepted as an objective assessment of the William Bland Centre.</p>	<p><u>Study versions</u> The study was reported to Council and made public in August 2018 as soon as possible after its completion in January 2018. Earlier drafts, described by various names, were part of the process of preparation of this study from 2013 and have no status before its completion and report to Council. Council provided its records of the early study identification process, including the 2014 draft, and the City's pre-exhibition review to these landowners in response to an information request. These document the consistent identification and selection of this building through the TKD study and City review process. The subsequent March 2019 update of the study at the request of the Department is addressed above.</p>

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No.	Submitter ¹	Submission summary	Submission response
F9	Anthony Pistoiese, Lot owner	<p><u>Listing assessment and excluded buildings</u> This selection process is totally unfair, subjective and unacceptable. The 14 study inventories were not made public. For the 5 items that were excluded, supposedly because they did not meet the threshold, their inventories of assessment should have been made available to the public to assess the basis for rejection. Council including or excluding items for heritage listing without providing a detailed explanation of their assessment for the item through heritage inventories is unfair and unacceptable. It is not good enough to state that “the other five items do not form part of the planning proposal”. This omission is a gross failure of process and procedural fairness.</p> <p>They do not know the basis for Berger House, completed in 1955 and a fine example. The Supreme Court Hospital Road Court complex was excluded even though designed in 1956 and opened by Premier Cahill. The study is intended to guide development so that these are appropriately managed and protected. TKD note 3 other similar buildings to on Macquarie Street, including Park House, with medical profession associations, which should have equal historical significance, but are not nominated.</p>	<p><u>Listing assessment and excluded buildings</u> All buildings have been impartially assessed using the criteria and process set out in the Council reports before exhibition. The study identifies this building as worthy of local listing for the criteria and qualities outlined above, following a survey of more than 110 comparable buildings.</p> <p>Before exhibition, for inclusion in the planning proposal, the City reviewed all study recommended buildings against 3 additional criteria to establish that their assessed significance could still be reasonably appreciated. The additional criteria included buildings 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 that the William Bland Centre met these additional criteria, together with other accomplished examples of its type and period, whereas Berger House and 4 other excluded buildings did not. The excluded buildings have not been reviewed further at this stage, as they are not part of the approved planning proposal on public exhibition. The proposal has been reviewed again following exhibition.</p> <p>The inventories for the 9 buildings and artworks proposed for listing were included in the public exhibition. The other inventories are retained in Council records. Council provided its records of the early study identification process and the City's pre-exhibition review to these landowners, including the Berger House inventory, in response to an information request.</p>

No.	Submitter ¹	Submission summary	Submission response
F9	Anthony Pistoiese, Lot owner	<p><u>Information access</u></p> <p>The availability and transparency of documents to the public should be paramount. The Gateway determination from the Department required all effected landowners to be provided with a copy of the planning proposal and supporting documents. They further recommended that heritage assessments of the landowners be additionally exhibited with the planning proposal to ensure that their views are considered by public authorities, the community and council. The DPIE believed that “the proposal is expecting likely to raise concern from landowners subject to the proposed listing”. Can Council confirm it complied with consultation requirements of the Gateway determination. If supporting documents of heritage inventories for 5 excluded items are not made available, how can the effected landowners of the 9 listed items be treated fairly and have confidence in selection process carried out by Council which should be unbiased in its decision.</p>	<p><u>Information access</u></p> <p>The information for Council's planning proposal was exhibited for public review and comment in 2019, as approved by Council, Central Sydney Planning Committee and the Department of Planning Industry and Environment's gateway determination. This includes Council's final planning proposal, study report and inventories for the 9 proposed heritage items. It does not include inventories for excluded buildings because these do not form part of the planning proposal on exhibition. 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 submission period of 2 months. The landowners' heritage assessment was included in the public exhibition. City staff considered all landowner and other submissions, including the GBA heritage submission.</p> <p>The inventories for excluded buildings are retained in Council records. Council provided its records of the early study identification process and the City's pre-exhibition review to these landowners, in response to an information access request.</p>
F9	Anthony Pistoiese, Lot owner	<p><u>Building period, height and comparisons</u></p> <p>William Bland Centre is not part of one of the most significant events in Central Sydney during the 1950's as part of the Modern Movement, the abolition of the 1912 height limit of 45.72 metres in 1957. Unilever House completed in 1958 was regarded as “Sydney's first major curtain walled office block as well as its most visually pure example”. The building does not demonstrate strong elements of the Modern Movement which predominantly occurred in the 1960s, several years after the William Bland Centre. It is not a fine example of the Modern Movement built to a very high standard. It was built at a period during the second half of the 1950's when, as TKD notes “Office buildings and retail construction priced residential buildings out of Central Sydney for many years because they offered better investment returns”. Sydney's emergence as a financial centre pushed up demand for all office space.</p>	<p><u>Building period, height and comparisons</u></p> <p>The study and planning proposal do not restrict significant examples to buildings constructed after the 1957 Act or taller than 150 feet. These are only some significant historic phases identified in this study from 1945. The Modern Movement began before the 1960s. The study recognises the diversity of the Modern Movement, as represented by this and other identified buildings. It does not identify set Modern Movement characteristics or specific building features as essential or more important than others for listing. The study identifies this building as worthy of local listing as a city example of the Modern Movement of local heritage significance. The building period and height are acknowledged in the study inventory for the building. These aspects contribute to the building's significance as one of a small extant group of distinct low-scale post-war offices in the city centre. Unilever House on Macquarie Street no longer forms part of this group as it has been demolished. A similar building of this scale, style and period in the local area is listed as state significant; the 1960 Liner House on Bridge Street. The study and planning proposal include other low-scale curtain wall buildings of this period including Liverpool & London & Globe and Horwitz House.</p>

No.	Submitter ¹	Submission summary	Submission response
F9	Anthony Pistolese, Lot owner	<u>Architect</u> Evidence is lacking that the architect, Hans Peter Oser, was prominent in the Modern Movement of Central Sydney in commercial office buildings. He died in 1967 at a time when the Modern Movement was at the peak of its expression.	<u>Architect</u> The documentation to support the listing is the heritage study and inventory. The inventory highlights notable buildings designed by Oser in Sydney during this era. These and the subject building demonstrate Oser was a practicing architect of the Modern Movement. The Modern Movement began before the 1960s. Other submissions highlight that Oser and this building are featured in an article on migrant Modern architecture by Rebecca Hawcroft and in the 2018 Museum of Sydney exhibition. The GBA heritage submission for landowners acknowledges that this building demonstrates some Modern Movement characteristics. Docomomo Australia, an advising organisation to UNESCO on modern architectural heritage, rejects the GBA statement that Oser is “not regarded as one of the important Modern Movement architects in post war Sydney.” The Heritage Council and Docomomo Australia submissions recognise this building by Oser as a Modern Movement example.
F9	Anthony Pistolese, Lot owner	<u>Building alterations</u> The building has undergone considerable renovations to the fabric and style since its construction both internally and externally. The foyer has been renovated and modernised from its original design years ago.	<u>Building alterations</u> City staff inspected the building and considered the landowners' submitted reports from Surface Design and GBA on building alterations and integrity. The building alterations are acknowledged in the inventory. The building retains its original construction, form, facade, internal configuration, lightwells with steel windows, marble cladding, foundation stone and plaque in the ground floor foyer and some timber joinery in upper level foyers, with minor alterations. This review and inspection confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. The building's significance, as assessed by the heritage study, can still be reasonably appreciated. The listing has been revised to exclude non-structural tenancy interiors.
F9	Anthony Pistolese, Lot owner	<u>Fire order works</u> Works are underway for the fire order upgrade. Many conditions, in particular fire stopping, stair pressurization, electrical upgrading, lift upgrading, water tanks upgrading, air conditioning vents sealed, fire alarm monitoring, fire hydrant upgrading and façade repairing are forcing necessary structural changes, altering the building design. Works to the slabs and fire stopping structural columns are a great cost. Many works have altered the interiors. To list the façade, significant interiors and concrete slab will pose problems for compliance with the order and burden owners with high levies. Listing on top of the fire order disregards the necessary changes and the considerable economic hardships to 70 owners and occupants.	<u>Fire order works and costs</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners' consultant reports. The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. The listing for interiors has been revised to exclude non-structural tenancy interiors. There are no direct cost or works required because of listing. 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. For development applications, the required documents are unchanged as a heritage impact statement is already required because of the building age. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.

No.	Submitter ¹	Submission summary	Submission response
F9	Anthony Pistoiese, Lot owner	<p><u>Building condition</u> The building is energy inefficient due to single glazing and the poor quality of the aluminium framing. It is also east-facing with the early morning heat problem. The façade leaks considerably on rainy days and glass panels have fallen out of their frames onto the Macquarie street pavement. This is a serious danger to the public.</p>	<p><u>Building condition</u> City staff met with owners to discuss these matters, inspected the building, and considered the landowners' submitted condition reports from Surface Design and GBA. The façade condition and safety issues are considered above in response to these submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p>
F10	Peter Sorras, Lot owner	<p>Oppose. This building does not meet any of the criteria thresholds, whether it's architecture, façade or initial building materials used. It is totally illogical to heritage list this building.</p>	<p>Objection noted. It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The study identifies this building as worthy of local listing as a city example of the Modern Movement of local heritage significance, based on a survey of more than 110 comparable buildings in central Sydney and further detailed assessment. The study concludes the building fulfils 6 Heritage Council criteria for local listing. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>

No.	Submitter ¹	Submission summary	Submission response
F11	Anthony Peters, Peter Superfund Co, Lot owner	<p>Oppose. As an owner and occupier of a lot in the building and owner of two other beautiful heritage properties in Surry Hills and Ultimo, they strongly object to the proposed heritage listing. They request Council revisit the selection criteria as the building has zero character, no cultural significance other than its named after William Bland and needs to be modernised rather than preserved. I'll leave it to your professionals to make the final call however, with respect, initially thought it was some type of mistake. Thank you for the avenue for providing feedback. Best of luck with the process moving forward. Council does a lot of good work in keeping Sydney beautiful.</p>	<p>Objection noted. It is acknowledged that this submission represents a current community view about the heritage value of this building. The study identifies this building as worthy of local listing as a city example of the Modern Movement of local heritage significance, based on a survey of more than 110 comparable buildings in central Sydney and further detailed assessment. The study concludes the building fulfils 6 Heritage Council criteria for local listing. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The study recognises the diversity of the Modern Movement, as represented by this and other identified buildings. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F12	Diana Vandeppeer, Lot owner	<p>Oppose. Strongly reject this proposal for heritage listing for the reasons below.</p>	<p>Objection noted and responded to below.</p>
F12	Diana Vandeppeer, Lot owner	<p><u>Significance</u> This building exhibits no significant value of architectural importance related to this time of the Modern Movement. This was extremely well covered and explained in the report by GBA Heritage report, engaged by the William Bland Centre Strata Committee. This completely contradicts the report by the Councils consultant TKD Architects.</p>	<p><u>Significance</u> The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The building is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>

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No.	Submitter ¹	Submission summary	Submission response
F12	Diana Vandeppeer, Lot owner	<p><u>Justice</u> If this listing proceeds it will be a complete injustice for absolutely no architectural significance relating to this period.</p>	<p><u>Justice</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. This building is identified for listing based on an independent heritage study and individual heritage assessment, 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 submission in the exhibition. City staff considered all owner and other submissions, including the GBA heritage submission, met with owners and inspected the building in order to review this proposal following public exhibition. Submissions have also been received in support of listing. As a result of the post-exhibition City review, the listing has been revised and inventory updated. 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>

No.	Submitter ¹	Submission summary	Submission response
F12	Diana Vandeppeer, Lot owner	<p><u>Costs</u> If this listing proceeds it will be an added financial burden to all lot owners for absolutely no architectural significance relating to this period.</p>	<p><u>Costs</u> There are no direct costs or works required because of listing. All buildings need ongoing maintenance and repair for their continued use. 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. By providing advance notice of heritage issues before an application is lodged, listing can reduce the cost and assessment time for an application. The application documents are unchanged because a heritage impact statement is already required for buildings of this age. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. The fire safety upgrade works for this building can continue uninterrupted. Retention and repair can be less disruptive and costly than demolition and replacement. For instance, the Surface Design report for landowners recommends sealing and repairs as the option of lowest cost and disruption to improve the façade performance. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Other potential savings from listing include reduced land taxes through a heritage valuation from the NSW Valuer General and waving the usual development contributions levy for adaptive re-use. Owners are encouraged to arrange pre-application meetings with City planners to minimise costs and for greater certainty about development plans.</p>
F13	Gregory Vandeppeer, Lot owner	<p>Oppose. As an owner, oppose the heritage listing for the reasons below.</p>	<p>Objection noted and responded to below.</p>

No.	Submitter ¹	Submission summary	Submission response
F13	Gregory Vandeppeer, Lot owner	<p><u>Significance</u> After reading the heritage report by GBA, commissioned by our Strata Committee to evaluate the heritage proposal, he completely agrees with their findings and conclusions that the building does not meet any of the criteria for defining the Modern Movement characteristics.</p>	<p><u>Significance</u> The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The building is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F13	Gregory Vandeppeer, Lot owner	<p><u>Fire order works</u> Disturbed about what impact and cost heritage listing will have on the completion of this fire order, which is yet to be settled.</p>	<p><u>Fire order works</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners' consultant reports. The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. There are no direct cost or works required because of listing. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.</p>
F13	Gregory Vandeppeer, Lot owner	<p><u>Façade condition</u> The condition of the glass façade, during rainy days, allows water to penetrate into the suites. This will have to be remedied in the future, but at what complications and extra costs if there is a heritage listing in place.</p>	<p><u>Façade condition</u> City staff met with owners to discuss these matters, inspected the building, and considered the landowners' submitted condition reports from Surface Design and GBA. The façade condition and safety issues are considered above in response to these submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p>

No.	Submitter ¹	Submission summary	Submission response
F13	Gregory Vandeppeer, Lot owner	<p><u>Interiors</u> Concerned with the potential heritage listing of the wording "significant interiors". What does this imply and what impact does this have on refurbishing suites?</p>	<p><u>Interiors</u> Non-structural tenancy interiors are excluded from the revised heritage item 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>
F14	Geoff Simpson, Lot owner	<p>Oppose. As a lot owner in the William Bland Centre, he has seen the proposal and also the conflicting reports as to the architectural merit of this building. With due respect, the William Bland Centre has little architectural merit and should not be listed.</p>	<p>The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The building is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F15	Ren Zhou Lawyers for lot owner	<p>Oppose. Instructed by the lot owner to strongly object to the listing for the sake of present and future occupants of the building with three reasons, noted below.</p>	<p>Objection noted and responded to below.</p>
F15	Ren Zhou Lawyers for lot owner	<p><u>Building alterations</u> It is not in the public interest to list a building which underwent significant refurbishments including the suites, foyer, façade and foyer since it was built. There is no heritage value to protect a building that has departed from its original form.</p>	<p><u>Building alterations</u> It is in the public interest to conserve buildings of assessed heritage significance, and through listing, alert owners that heritage is a consideration ahead of a development application and give owners access to conservation incentives. City staff inspected the building and considered the landowners' submitted reports from Surface Design and GBA on building alterations and integrity. The building alterations are acknowledged in the inventory. The building retains its original construction, form, facade, internal configuration, lightwells with steel windows, marble cladding, foundation stone and plaque in the ground floor foyer and some timber joinery in upper level foyers, with minor alterations. This review and inspection confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. The building's significance, as assessed by the heritage study, can still be reasonably appreciated. The listing has been revised to exclude non-structural tenancy interiors.</p>

No.	Submitter ¹	Submission summary	Submission response
F15	Ren Zhou Lawyers for lot owner (24/9/19)	<u>Fire order works</u> The building is subject to a fire order from Council. The final plan of the fire order is yet to be finalised and that the final plan may further impact on the building requiring demolition of some aspects that the heritage proposal seeks to preserve.	<u>Fire order works</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners' consultant reports. The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety.
F15	Ren Zhou Lawyers for lot owner	<u>Future building works</u> Further costs and delays in future building works will be incurred by occupants or future occupants of the building if it is heritage listed.	<u>Future building works</u> City staff met with owners to discuss these matters, inspected the building and considered the landowners' consultant submissions from Surface Design, GBA and MinterEllison. The development of the building and its commercial operation is addressed in the above response to the MinterEllison submission. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. For development applications, the documents are unchanged because a heritage impact statement is already required for buildings of this age. By providing advance notice of heritage issues before an application is lodged, listing can reduce the cost and assessment time for an application. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. City staff will continue to assist owners with advice on the development process.
F16	Lot owner	Oppose. For reasons below.	Objection noted and responded to below.
F16	Lot owner	<u>Significance</u> It is questionable that this building in a notable representation of the Modern Movement Architecture including significant interiors.	<u>Significance</u> It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.

No.	Submitter ¹	Submission summary	Submission response
F16	Lot owner	<p><u>Upgrades and development</u> Listing the WBC will impose many unreasonable and costly impositions on any upgrades and further development of the building that may be required so as to meet the standards for building safety, especially fire safety, and amenity.</p>	<p><u>Upgrades and development</u> City staff met with owners to discuss these matters, inspected the building and considered the landowners' consultant reports and submissions from Surface Design, GBA and MinterEllison. The upgrade and development of this building is addressed above in the response to the Surface Design and MinterEllison submissions. Listed buildings can still be repaired, upgraded to meet current standards and developed. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. For development applications, the documents are unchanged because a heritage impact statement is already required for buildings of this age. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. Listing this building gives its owners an option to recoup upgrade costs through a heritage floor space award. City staff will continue to assist owners with advice on the development process.</p>
F17	Lot owner	<p>Oppose. On behalf of he and his wife, outlined below.</p>	<p>Objection noted and responded to below.</p>

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No.	Submitter ¹	Submission summary	Submission response
F17	Lot owner	<p><u>Significance</u> In his general dental practice he tells patients from all over Sydney about the proposed listing as a point of interest. The unanimous reply has been "why?" and unanimous expression of disbelief. The GBA heritage submission for landowners says it all. GBA states the building does not meet any of the criteria thresholds required for heritage listing. Indeed, that it is listed as 'Modern Movement' is bizarre. Modernism in architecture, using reinforced concrete, is to allow natural light, by the use of glass, to pass through the building between at least two sides, preferably four. William Bland Centre was never going to fulfil this with over 100 small strata units demanding privacy from one another and it being surrounded on three sides by other buildings. The expansive glass of the street façade is absent from the other three sides, which face closely onto other buildings. The William Bland Centre building requires electric lighting throughout daylight hours. It is a waste of the Council's time, effort and money to pursue this listing further.</p>	<p><u>Significance</u> It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The GBA submission has been addressed in detail above. The TKD study identifies this building as worthy of local listing as a city example of the Modern Movement of local heritage significance, based on a survey of more than 110 comparable buildings in central Sydney and further detailed assessment. The study concludes the building fulfils six Heritage Council criteria for local listing. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The building's design, construction and materials are acknowledged in the inventory. The study recognises the diversity of the Modern Movement as represented by this and other identified buildings. Buildings of different design and construction are included. The study notes the use of artificial as well as natural lighting in Modern Movement building interiors. The study does not identify set Modern Movement characteristics or building features as essential or more important than others for listing, as suggested by GBA. Significant characteristics of this building are individually assessed in the inventory, based on the full study process and Heritage Council listing criteria, rather than set movement characteristics. Some public submissions also support this listing. 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>

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F17	Lot owner	<p><u>Building condition</u> All it has is a peculiar street façade that is failing in its functionality. Before long the building will require demolition. The building has exposed pipes and wires running through common property. The mural in the foyer, a copy of Dr Bland's colonial home, is less than 10 years old and likely to fade in time. The recent cheap refurbishments merely 'prettied it up' somewhat but did not hide that the interior is basically falling apart. It simply has a cheap appearance including the front façade which is sad at best and leaks.</p>	<p><u>Building condition</u> City staff met with owners to discuss these matters, inspected the building, and considered the landowners' submitted condition and integrity reports from Surface Design and GBA. The façade condition and safety issues are considered above in response to these submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p>
F18	Lot owner/ occupant	<p>Oppose. They wish to voice strong objection to heritage list this site as it was an ordinary office building constructed in 1959 and does not have the qualities of other properties with a historical significance.</p>	<p>Objection noted. It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F19	Newman Psaltis & Co Lawyers for lot owner	<p>Oppose. They act for the owner and strenuously oppose the listing for the reasons below.</p>	<p>Objection noted and responded to below.</p>

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F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Costs</u> Onerous financial and business interruption burdens will be placed on the owners' corporation and the individual proprietors.</p>	<p><u>Costs</u> There are no direct costs or works required because of listing. All buildings need ongoing maintenance and repair for their continued use. Listing as a heritage item recognises the heritage significance of the building and ensures this is considered in future development through the development application process. By providing advance notice of heritage issues before an application is lodged, listing can reduce the cost and assessment time for an application. The application documents are unchanged because a heritage impact statement is already required for buildings of this age. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. Retention and repair can be less disruptive and costly than demolition and replacement. For instance, the Surface Design report for landowners recommends sealing and repairs as the option of lowest cost and disruption to improve the façade performance. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Other potential savings from listing include reduced land taxes through a heritage valuation from the NSW Valuer General and waving the usual development contributions levy for adaptive re-use. Owners are encouraged to arrange pre-application meetings with City planners to minimise costs and for greater certainty about development plans.</p>

No.	Submitter ¹	Submission summary	Submission response
F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Justification</u> This action by council is both inappropriate and unnecessary.</p>	<p><u>Justification</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. This building is identified for listing based on an independent heritage study and individual heritage assessment, in accordance with the Heritage Council criteria and Heritage Office guide. The study was commenced at the direction of Council. 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. City staff considered all owner and other submissions, including the GBA heritage submission, met with owners and inspected the building in order to review this proposal following public exhibition. Submissions have also been received in support of listing. As a result of the post-exhibition City review, the listing has been revised and inventory updated. 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>
155 F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Significance</u> William Bland Centre does not in any reasonable interpretation of the heritage legislation meet the criteria for such a listing. We refer to and rely on the submissions contained in the GBA Report prepared on behalf of the proprietors of WBC and submitted for exhibition.</p>	<p><u>Significance</u> The building has been assessed for listing and the planning proposal processed in accordance with the Environmental Planning and Assessment Act 1979 and the Heritage Council criteria for local significance under the Heritage Act 1977. The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The building is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>

No.	Submitter ¹	Submission summary	Submission response
F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Alterations, condition and safety</u> Many of the suites, foyer and hallways in the building have been refurbished to new and the façade has extensive structural and leakage problems with inadequate protection from the elements in accordance with today's building standards.</p> <p>Public safety must take precedence over the cosmetic appeal of preserving an inappropriate and unworthy building. To impede the eventual replacement of the facade will over the following decade result in a threat to the safety of the pedestrians below. The facade will require replacement in the coming years as a vital safety issue involving further substantial expense to proprietors.</p>	<p><u>Alterations, condition and safety</u> City staff inspected the building and considered the landowners' submitted reports from Surface Design and GBA on building alterations, condition and integrity. The building alterations are acknowledged in the inventory. The façade condition and safety issues are considered above in response to these submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p> <p>The building retains its original construction, form, facade, internal configuration, lightwells with steel windows, marble cladding, foundation stone and plaque in the ground floor foyer and some timber joinery in upper level foyers, with minor alterations. This review and inspection confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. The building's significance, as assessed by the heritage study, can still be reasonably appreciated. The listing has been revised to exclude non-structural tenancy interiors.</p>
F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Fire order and costs</u> The extent of the fire order will substantially alter the appearance of every facet of the building. The final design of the fire order is yet to be settled. That design will substantially impact on the building's appearance, requiring demolition of some aspects that the heritage proposal seeks to preserve and generally defacing the building as is evident from the work which has already been carried out. The fire order is impacting what little character the building has. The financial burden of the fire order on close to 100 proprietors over the last 3 years and continuing into at least the next 2 years is greatly burdensome both financially and in the interruption of normal business activity.</p>	<p><u>Fire order and costs</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners' consultant reports. The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. The listing for interiors has been revised to exclude non-structural tenancy interiors. There are no direct cost or works required because of listing. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.</p>

No.	Submitter ¹	Submission summary	Submission response
F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Commercial operations</u></p> <p>The building is comprised of numerous independent small business operators and professionals. The listing will cause them great distress culminating in the possible closing of their businesses or the laying off of staff. There are many doctors, dentists, lawyers and craftsmen of various professions operating to serve the community. These businesses have already suffered immeasurable interruptions and expenses due to the fire order.</p>	<p><u>Commercial operations</u></p> <p>City staff met with owners to discuss these matters, inspected the building and considered the landowners' consultant submissions from Surface Design, GBA and MinterEllison. The development and upgrade of the building is addressed in the above response to the MinterEllison submission. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. For development applications, the documents are unchanged because a heritage impact statement is already required for buildings of this age. By providing advance notice of heritage issues before an application is lodged, listing can reduce the cost and assessment time for an application. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. City staff will continue to assist owners with advice on the development process.</p>
F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Building type and period</u></p> <p>The architect used conventional building methods of brick and steel and not the new materials of reinforced concrete, aluminium, internal open design and double glaze glass windows. The building does not fall within the Modern Movement heritage study. The development application predates the very legislation that is being used to enable the study to take place.</p>	<p><u>Building type and period</u></p> <p>The study and planning proposal do not restrict significant examples to buildings of particular materials or construction, built after the 1957 Act or with open floor plans. These are only some significant historic phases and building types of the Modern Movement identified in this study from 1945. The study recognises the diversity of the Modern Movement, as represented by the identified buildings. It does not identify set Modern Movement characteristics or building types as essential or more important than others for listing. Significant characteristics of this building are individually assessed in the study inventory. The building's period, when heights and construction were changing, construction, materials and design for small medical suites are acknowledged in the inventory. These aspects contribute to the building's significance as one of the small extant group of distinct lower-scale glass curtain wall post-war office buildings in the city centre, associated with the medical profession. A similar building of this scale, style and period in the local area is listed as state significant; the 1960 Liner House on Bridge Street. The study and planning proposal include other low-scale curtain wall buildings of this period including Liverpool & London & Globe and Horwitz House.</p>
F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Images</u></p> <p>Council has seen fit to 'photo shop' the images of the William Bland Centre. The images seen online are distant from the reality of its appearance.</p>	<p><u>Images</u></p> <p>The photographs included in the inventory and Council reports are as true and clear an illustration of the building as possible. It is unclear what change is objected to through the 'photo shop' description.</p>

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F19	Newman Psaltis & Co Lawyers for lot owner	<p><u>Criteria and comparisons</u> Council's premise to list the "most significant" buildings for the Modern Movement in NSW is to preserve those commercial buildings which are "designed and built to a very high standard", have "outstanding architectural and civic accomplishments" and "exceptional architectural quality". WBC does not reasonably fall within this premise and is day by day with the carrying out of the fire order moving further and further away from it.</p> <p>The building has erroneously been placed in essentially the same category as the MLC Centre, an architectural marvel that meets all modernist principals both within and without. The building does not in any way meet the same design standards as the MLC Centre and cannot reasonably be considered a "significant" building insofar as the modern movement is concerned.</p>	<p><u>Criteria and comparisons</u> The study and planning proposal recognises the diversity of the Modern Movement, as represented by this and other identified buildings. They do not identify set Modern Movement characteristics or building features as essential or more important than others for listing. The quoted comments refer to the Modern Movement period generally, which also includes buildings with greater than local significance required for local listing, such as the world-heritage listed Sydney Opera House. These do not relate to every building and do not set listing requirements. Outstanding or exceptional 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. The parts of the study that relate directly to the assessed significance of this building are the recommended listings and the inventory for this building. These represent the outcome of the full study process, including a survey of more than 110 comparable buildings in the city and further detailed assessment. The study identifies this building as worthy of local listing, fulfilling six Heritage Council criteria. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. The MLC Centre is assessed as state significant; a higher level of significance than required for local listing.</p>
F20	Lot owner	<p>Oppose. As a lot owner, for the reasons below. Council should reconsider its position and remove the William Bland Centre from its proposed heritage list.</p>	<p>Objection noted and responded to below.</p>

No.	Submitter ¹	Submission summary	Submission response
F20	Lot owner	<p><u>Investment, operations and development</u> Concerned about the impact listing may have on the value of the investment, interruption to business, potential future development opportunities and upgrades. They are not comforted by the heritage floor space as compensation for listing and the impacts of listing.</p>	<p><u>Investment, operations and development</u> City staff met with owners to discuss these matters, inspected the building and considered the landowners' consultant submissions from Surface Design, GBA and MinterEllison. The development and upgrade of the building is addressed in the above response to the MinterEllison submission. Listed buildings can still be repaired, upgraded to meet current standards and developed. This planning proposal makes no change to the zoning or development standards for the site. 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. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. For development applications, the documents are unchanged because a heritage impact statement is already required for buildings of this age. By providing advance notice of heritage issues before an application is lodged, listing can reduce the cost and assessment time for an application. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. City staff will continue to assist owners with advice on the development process.</p>
159 F20	Lot owner	<p><u>Landowners' heritage submission</u> The GBA heritage submission for landowners indicates the building does not sufficiently exhibit defining Modern Movement characteristics identified in the TKD study, not does it pass any of the thresholds for listing on Sydney LEP 2012. Based on these conclusions it would be inappropriate and unreasonable for Council to pursue listing the building as an exemplar of the Modern Movement.</p>	<p><u>Landowners' heritage submission</u> The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The building is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F21	Lot owner	<p>Oppose. As a lot owner, for the reasons below.</p>	<p>Objection noted and responded to below.</p>

No.	Submitter ¹	Submission summary	Submission response
F21	Lot owner	<p><u>Criteria</u> The William Bland Centre does not in any reasonable sense meet the criteria for a heritage listing.</p>	<p><u>Criteria</u> It is acknowledged that this submission represents a current community view about the heritage value of the William Bland Centre. City staff considered all owner and other submissions, including the exhibited GBA heritage submission, met with owners and inspected the building in order to review this proposal. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>
F21	Lot owner	<p><u>Fire order</u> The William Bland Centre is subject to a fire order from the council, which is substantially altering the appearance of every facet of the building. The final design of the fire order is yet to be settled. That design will substantially impact on the building's appearance, requiring demolition of some aspects that the heritage proposal seeks to preserve and generally defacing the building, as evident from the work carried out.</p>	<p><u>Fire order</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners' consultant reports. The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.</p>

No.	Submitter ¹	Submission summary	Submission response
F21	Lot owner	<p><u>Alterations, condition and safety</u> Many of the suites, foyer and hallways in the building have been refurbished to new and the façade has extensive structural and leakage problems with inadequate protection from the elements in accordance with today's building standards.</p> <p>Public safety must take precedence over the cosmetic appeal of preserving an inappropriate and unworthy building. To impede the eventual replacement of the facade will over the following decade result in a threat to the safety of the pedestrians below. The facade will require replacement in the coming years as a vital safety issue involving further substantial expense to proprietors.</p>	<p><u>Alterations, condition and safety</u> City staff inspected the building and considered the landowners' submitted reports from Surface Design and GBA on building alterations, condition and integrity. The building alterations are acknowledged in the inventory. The façade condition and safety issues are considered above in response to these submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p> <p>The building retains its original construction, form, facade, internal configuration, lightwells with steel windows, marble cladding, foundation stone and plaque in the ground floor foyer and some timber joinery in upper level foyers, with minor alterations. This review and inspection confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. The building's significance, as assessed by the heritage study, can still be reasonably appreciated. The listing has been revised to exclude non-structural tenancy interiors.</p>
F21	Lot owner	<p><u>Building type and period</u> The William Bland Centre's architect used conventional building methods of brick and steel and not the new materials of reinforced concrete, aluminium, internal open design and double glaze glass windows. The building does not fall within the Modern Movement heritage study. The development application for the erection of the building in fact predates the very legislation that is being used to enable the study to take place.</p>	<p><u>Building type and period</u> The study and planning proposal do not restrict significant examples to buildings of particular materials or construction, built after the 1957 Act or with open floor plans. These are only some significant historic phases and building types of the Modern Movement identified in this study from 1945. The study recognises the diversity of the Modern Movement, as represented by the identified buildings. It does not identify set Modern Movement characteristics or building types as essential or more important than others for listing. Significant characteristics of this building are individually assessed in the study inventory. The building's period, when heights and construction were changing, construction, materials and design for small medical suites are acknowledged in the inventory. These aspects contribute to the building's significance as one of the small extant group of distinct lower-scale glass curtain wall post-war office buildings in the city centre, associated with the medical profession. A similar building of this scale, style and period in the local area is listed as state significant; the 1960 Liner House on Bridge Street. The study and planning proposal include other low-scale curtain wall buildings of this period including Liverpool & London & Globe and Horwitz House.</p>

No.	Submitter ¹	Submission summary	Submission response
F22	Lot owner	Oppose. For the reasons below.	Objection noted and responded to below.
F22	Lot owner	<p><u>Landowners' heritage submission and criteria</u> The William Bland Centre does not in any reasonable sense meet the criteria for a heritage listing. Refer to the GBA heritage submission for landowners.</p>	<p><u>Landowners' heritage submission and criteria</u> The building has been assessed for listing and the planning proposal processed in accordance with the Environmental Planning and Assessment Act 1979 and the Heritage Council criteria for local significance under the Heritage Act 1977. The GBA heritage assessment for landowners was exhibited with the planning proposal and is considered in detail above. The GBA assessment does not present substantive new information to overturn the study assessment. The study identifies this building as worthy of local listing, fulfilling 6 Heritage Council listing criteria. The building is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. It is acknowledged that this submission represents a current community view about the heritage value of this building. Some public submissions also support this listing. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. 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. As a result of the post-exhibition City review, the listing has been revised and inventory updated.</p>

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F22	Lot owner	<p><u>Alterations, condition and safety</u> Many of the suites, foyer and hallways in the building have been refurbished to new and the façade has extensive structural and leakage problems with inadequate protection from the elements in accordance with today's building standards.</p> <p>Public safety must take precedence over the cosmetic appeal of preserving an inappropriate and unworthy building. To impede the eventual replacement of the facade will over the following decade result in a threat to the safety of the pedestrians below. The facade will require replacement in the coming years as a vital safety issue involving further substantial expense to proprietors.</p>	<p><u>Alterations, condition and safety</u> City staff inspected the building and considered the landowners' submitted reports from Surface Design and GBA on building alterations, condition and integrity. The building alterations are acknowledged in the inventory. The façade condition and safety issues are considered above in response to these submissions. Surface Design provides options to address the identified performance issues while retaining the façade. GBA concludes the risk of glass fall is low, and both GBA and Surface Design indicate this risk can be mitigated with an awning. It is most appropriate to consider and address the identified issues at the development application stage when a detailed proposal is prepared. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award. Minor repairs can be achieved through the quick low-cost notification process for 'heritage works without consent.' City staff will continue to assist owners with advice on the development process.</p> <p>The building retains its original construction, form, facade, internal configuration, lightwells with steel windows, marble cladding, foundation stone and plaque in the ground floor foyer and some timber joinery in upper level foyers, with minor alterations. This review and inspection confirms the building has a reasonable level of integrity, with some alterations which do not compromise its assessed significance. The building's significance, as assessed by the heritage study, can still be reasonably appreciated. The listing has been revised to exclude non-structural tenancy interiors.</p>
F22	Lot owner	<p><u>Fire order and costs</u> The extent of the fire order will substantially alter the appearance of every facet of the building. The final design of the fire order is yet to be settled. That design will substantially impact on the building's appearance, requiring demolition of some aspects that the heritage proposal seeks to preserve and generally defacing the building as is evident from the work which has already been carried out. The fire order is impacting what little character the building has. The financial burden of the fire order on close to 100 proprietors over the last 3 years and continuing into at least the next 2 years is greatly burdensome both financially and in the interruption of normal business activity.</p>	<p><u>Fire order and costs</u> City staff met with owners to discuss these matters, inspected the building, reviewed the 2016 fire order and considered the landowners' consultant reports. The fire upgrade works are considered and addressed in more detail in the above response to the MinterEllison submission for the landowners. The fire upgrade works can continue uninterrupted, before and after listing, to improve the building's fire safety. The listing for interiors has been revised to exclude non-structural tenancy interiors. There are no direct cost or works required because of listing. Listing this building gives its owners an option to recoup upgrade costs or generate revenue for works through a heritage floor space award.</p>

No.	Submitter ¹	Submission summary	Submission response
F22	Lot owner	<p><u>Commercial operations</u> The building is comprised of numerous independent small business operators and professionals. The listing will cause them great distress culminating in the possible closing of their businesses or the laying off of staff.</p>	<p><u>Commercial operations</u> City staff met with owners to discuss these matters, inspected the building and considered the landowners' consultant submissions from Surface Design, GBA and MinterEllison. The development and upgrade of the building is addressed in the above response to the MinterEllison submission. The reduced listing, excluding non-structural tenancy interiors, and proposed complying development mean the development process will be unchanged for most commercial fit-outs. For development applications, the documents are unchanged because a heritage impact statement is already required for buildings of this age. By providing advance notice of heritage issues before an application is lodged, listing can reduce the cost and assessment time for an application. Minor works or repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'. City staff will continue to assist owners with advice on the development process.</p>
F22	Lot owner	<p><u>Building type and period</u> The William Bland Centre's architect used conventional building methods of brick and steel and not the new materials of reinforced concrete, aluminium, internal open design and double glaze glass windows. The building does not fall within the Modern Movement heritage study. The development application for the erection of the building in fact predates the very legislation that is being used to enable the study to take place.</p>	<p><u>Building type and period</u> The study and planning proposal do not restrict significant examples to buildings of particular materials or construction, built after the 1957 Act or with open floor plans. These are only some significant historic phases and building types of the Modern Movement identified in this study from 1945. The study recognises the diversity of the Modern Movement, as represented by the identified buildings. It does not identify set Modern Movement characteristics or building types as essential or more important than others for listing. Significant characteristics of this building are individually assessed in the study inventory. The building's period, when heights and construction were changing, construction, materials and design for small medical suites are acknowledged in the inventory. These aspects contribute to the building's significance as one of the small extant group of distinct lower-scale glass curtain wall post-war office buildings in the city centre, associated with the medical profession. A similar building of this scale, style and period in the local area is listed as state significant; the 1960 Liner House on Bridge Street. The study and planning proposal include other low-scale curtain wall buildings of this period including Liverpool & London & Globe and Horwitz House.</p>
F22	Lot owner	<p><u>Images</u> Council has seen fit to 'photo shop' the images of the William Bland Centre. The images seen online are distant from the reality of its appearance.</p>	<p><u>Images</u> The photographs included in the inventory and Council reports are as true and clear an illustration of the building as possible. It is unclear what change is objected to through the 'photo shop' description.</p>

No.	Submitter ¹	Submission summary	Submission response
F22	Lot owner	<p><u>Criteria and comparisons</u> Council's premise to list the "most significant" buildings for the Modern Movement in NSW is to preserve those commercial buildings which are "designed and built to a very high standard", have "outstanding architectural and civic accomplishments" and "exceptional architectural quality". WBC does not reasonably fall within this premise and is day by day with the carrying out of the fire order moving further and further away from it.</p> <p>The building has erroneously been placed in essentially the same category as the MLC Centre, an architectural marvel that meets all modernist principals both within and without. The building does not in any way meet the same design standards as the MLC Centre and cannot reasonably be considered a "significant" building insofar as the modern movement is concerned.</p>	<p><u>Criteria and comparisons</u> The study and planning proposal recognises the diversity of the Modern Movement, as represented by this and other identified buildings. They do not identify set Modern Movement characteristics or building features as essential or more important than others for listing. The quoted comments refer to the Modern Movement period generally, which also includes buildings with greater than local significance required for local listing, such as the world-heritage listed Sydney Opera House. These do not relate to every building and do not set listing requirements. Outstanding or exceptional 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. The parts of the study that relate directly to the assessed significance of this building are the recommended listings and the inventory for this building. These represent the outcome of the full study process, including a survey of more than 110 comparable buildings in the city and further detailed assessment. The study identifies this building as worthy of local listing, fulfilling six Heritage Council criteria. The William Bland Centre is assessed as significant as a central Sydney example of the Post War International style of glass curtain wall offices, distinguished by its unusual curtain wall pattern, the work of respected emigre architect Hans Peter Oser, the oldest known surviving example of lift slab construction in central Sydney, and for its association with the medical profession. The Heritage Council and Docomomo Australia submissions recognise this building as a Modern Movement example. The MLC Centre is assessed as state significant; a higher level of significance than required for local listing.</p>
F22	Lot owner	<p><u>William Bland</u> It is unusual for a building to be named after a killer. Following an argument, William Bland killed Robert Case in a duel in 1813.</p>	<p><u>William Bland</u> Further historical information noted. William Bland was an eminent colonial surgeon. The naming of this building after this historical figure reinforces its association with the medical profession.</p>

No.	Submitter ¹	Submission summary	Submission response
F23	Lot owner	<p>Support. As an owner of two suites in the building, they would love the unique and highly symbolic architecture of this building to be preserved. They would love to see the original facade, of which there are many photos, reinstated. The William Bland Centre was one, if not the main exhibit, from a 2018 Museum of Sydney exhibition of Sydney's Modern Architecture by World War II refugees. Designed by two refugee architects, one French, the other Austrian, the building has a classic European feel. The classic glass frontage shouts "Modernism" in its most innovative and authentic way. The entrance was ruined by ignorant renovators during the 1980s and 1990s, but the awning was destroyed by fire in 2018 and hence the building now in a position to be reinstated to its former glory. They hope Council insists on this. Thank you to Council for including this unique and classical piece of modern architecture in your heritage plans.</p>	<p>Support noted. Listing as a heritage item recognises the heritage significance of a building and ensures this is considered in future development. Landowners can consider the option to reinstate removed features or replace additions with more compatible alternatives through the development application process or in support of a heritage floor space award application. Owners are encouraged to arrange pre-application meetings with City planners to gain greater certainty about development plans.</p>
F24	Lot owner	<p>Support. As an owner of a suite in the building, they would be very pleased to see the exterior of the building and some of the inner features, preserved. The building has serious cultural significance being designed by two refugees from the second world war. It also has, they believe, a unique place in our city's modernist expression movement.</p>	<p>Support noted. The proposal, as revised, is to list the building, structure and some internal features. This recognises the heritage significance of the building and ensures this is considered in future development through the development application or other approval process.</p>

No.	Submitter ¹	Submission summary	Submission response
A2	Docomomo Australia Inc	<p>Support. Docomomo Australia supports the proposed listing of the William Bland Centre as an item of local heritage significance and disagrees with the owners' consultant that the building does not meet the listing criteria. It is incorrect to state that H.P. Oser was "not regarded as one of the important Modern Movement architects in post war Sydney". The consultant provides no evidence for this assertion. In terms of its aesthetic significance, the beautifully modulated geometry of the front façade places the building above most of its contemporaries in terms of design. There is no strict vertical or horizontal grid but a breaking down of the façade by the use of varying spacing of the vertical mullions and the alternation of light and dark spandrel panels. The further subdivision of the glazed sections of the façade further enlivens the façade. The owner's consultants claim that the building does not take advantage of Modernism's "prominent three-dimensional characteristics" ignores the building's location as part of an urban "wall" in what was Sydney's most prestigious street, especially for medical specialists. There was no ability or requirement to sacrifice site area by creating a "three-dimensional" building.</p>	Support noted.
A15	Glenn A Harper	<p>Support. This and the other two curtain wall buildings at 62 Pitt Street and the Former Sydney County Council building 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, they believe, must be recognised by their heritage listing.</p>	Support noted. The curtain wall facade is included in the listing and its significance and integrity described in the inventory.

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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>

No.	Submitter ¹	Submission summary	Submission response
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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No.	Submitter ¹	Submission summary	Submission response
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>
5 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>

No.	Submitter ¹	Submission summary	Submission response
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>

No.	Submitter ¹	Submission summary	Submission response
A6	Jessica Bokey	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.	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.
A7	Carolyn Johnstone	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.	Support noted.
A8	Community member	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.	Support noted.
A9	Community member	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.	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.

No.	Submitter ¹	Submission summary	Submission response
A10	Caroline Noonan-Edwards	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.	Support noted.
A11	Stephen Batey	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.	Support noted.
A12	David Ellison	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.	Support noted.
A13	Flavia Scardamaglia	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!	Support noted.
A14	Community member	Support. I support all of these proposed listings.	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	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.	Support noted.
A18	Anonymous	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.	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.
A19	Bill Hatossy	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.	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.
A20	Andrew Woodhouse	Oppose. Register his objection published in City Hub on 11/9/2019 and Sydney Morning Herald on 13/9/2019.	Objection noted and responded to below.

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No.	Submitter ¹	Submission summary	Submission response
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>