

1 April 2021

Mr Adrian Pilton
Chair of the Panel
Office of the Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000

Dear Mr Pilton,

Re: MLC Building, North Sydney (former) – Public submission on proposed listing on State Heritage Register

Multiplex welcomes this opportunity to provide a public submission to the IPC on the proposed listing of 105 Miller St, North Sydney on the State Heritage Register.

Multiplex, as a premier global construction company, have delivered over 1000 building projects which have defined the skyline of major cities in Australasia, Asia, Europe and America. In many of the projects we undertake, we encounter opportunities to respect our architectural and construction history by restoring heritage buildings and elements, incorporating old with new. We are proud of the great outcomes working in collaboration with experts, authorities and the community.

Multiplex current heritage projects include the protection of Shell & Beneficial House buildings in the One Carrington project in Sydney; the preservation of the original façade at the Australian Nursing and Midwifery Federation building in Melbourne; and one of our proudest achievements, the preservation of one of London's original Roman Walls in the aptly named London Wall Place project. Other projects involving heritage works in Sydney include the Intercontinental Hotel incorporating the former Treasury building, the Grace Hotel, Sydney Central Plaza, Finger Wharf, Jones Bay Wharf, Walsh Bay and Luna Park.

As part of the global Brookfield group and in delivering projects for our clients, Multiplex understand the challenge that property owners have to continuously upgrade their building assets to respond to future trends and requirements. Preserving our built heritage must be balanced against the need for modern and safe workplaces, high quality community facilities and sustainable buildings with small environmental footprints. Sydney needs modern, cohesive workplaces that satisfy the safety, technology, and cultural expectations of the globalised 21st century workplace. Furthermore, the buildings in use and being built today must be capable of renewal in response to jobs of the future.

On the proposed heritage listing of the MLC Building at 105 Miller Street North Sydney, we are of the view that this listing would not be appropriate. The existing B-grade building is already challenged in keeping up with the standards of today's workplaces. This building does not meet the criteria of a premium grade building including floor plate size, floor to floor height, tenant requirements, environmental and energy rating. If the building is subject to a heritage listing, refurbishment works would be bound by a CMP constrained by the 1950s style built form and elements, and continue to fall in ranking and relevance compared with recent developments like 177 Pacific Highway, 100 Mount, 118 Mount and 1 Denison, and upcoming projects like Victoria Cross and 110 Walker.

NSW Planning Minister Rob Stokes who in June last year described the current North Sydney as “one dimensional”; “where segregated land use planning saw wall-to-wall commercial offices towers displace virtually every other use”; and “This saw the soul stripped out of the inner-city hub, with much of the local character lost to nondescript commercial office towers.”

Given the significant size of the site and its location adjacent to two train stations and transport interchange nodes, it would be a major missed opportunity for North Sydney and its community, if the transformational scheme proposed by Investa does not proceed. The proposed redevelopment would be a landmark building which leads the way in environmental initiatives - carbon neutral and water self-sufficiency – two exemplar aspirations for all future buildings. The proposed building, with high ceilings, open atrium and well-ventilated spaces would be a vast contrast to the current building and its future under a heritage listing.

The redevelopment proposal has the support of the local community, including residents, business, and council. These stakeholders have recognised that the scheme will provide f & b and entertainment venues, and create an area with an free and open public space for the local community to meet and enjoy in all-hours.

The North Sydney community through its elected local representatives has made its views known. The North Sydney Council supports the redevelopment of 105 Miller St, North Sydney.

It is unfortunate that the Heritage Council has felt it necessary to revisit the issue of 105 Miller Street. It had previously considered the building and did not proceed with recommending its listing on the State Heritage Register. As a result of that decision, Investa and its investors rightfully understood that they could proceed with confidence.

If the NSW community, local and global investors, property owners and the construction sector are to have ongoing confidence in the NSW planning and approvals system, including heritage protection, it must provide both certainty and balance between competing interests in a timely manner.

Investors and property owners need to have confidence that a decision on heritage once made, is binding. The alternative is either investors requiring a higher return for the higher risk of investing in NSW or investing elsewhere. As a global company, we stress that New South Wales is in a global competition for investment capital. Consideration must be exercised not to impede the State’s economic recovery from the recent pandemic.

Multiplex would be willing to assist the Independent Planning Commission review further if required.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D Ghannoum', with a long horizontal flourish extending to the right.

David Ghannoum
Regional Managing Director
Multiplex