



To: Lara Huckstepp
From: Lucinda Varley
Date: 10 September 2020
Re: DA 147/20 -105- 153 Miller Street, North Sydney MLC Building

1. CURRENT HERITAGE STATUS

The subject site is currently listed as a heritage item of local significance (No. 10893) in Schedule 5 of the North Sydney Local Environmental Plan (LEP) 2013. The Statement of Significance states:

The first high rise office block in North Sydney and the largest for a number of years after its construction, the MLC Building in North Sydney is a seminal building on subsequent high-rise design in Sydney and utilised construction and structural techniques not previously used in Australia. With the first use of a curtain wall design and the first use of modular units in Australia, its use of exceptional modernist building materials in the curtain wall facade and terracotta glazed bricks are representative of the Post-War International style of architecture that predominated in these early commercial high-rise buildings. The architect, Walter Osborn McCutcheon's desire for his buildings to integrate modern art within the fabric of the design is demonstrated by the inclusion of significant artists such as Andor Mészáros and Gerald Lewers. As a result, and despite subsequent modifications, the interior, exterior and landscape setting are of high aesthetic, technical and representative significance. The building is also of historical, associative and aesthetic significance as an important work by a significant firm of architects Bates Smart and McCutcheon, and master builders Concrete Constructions, and as a landmark site at North Sydney which signified the transformation of the centre of North Sydney from Nineteenth Century town to the second commercial hub of metropolitan Sydney from the late 1950s.

The property is listed as a heritage item in the North Sydney LEP, however, it is not within any Heritage Conservation Area. The property has never been nominated by North Sydney Council for state heritage listing, although it has been identified by Council's Conservation Planners as reaching the threshold. In response to community interest to the development application, the NSW Heritage Council resolved on 1 September, 2020 of its intention to state list the building. The statement of significance may be viewed at <https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5062226>

The NSW Heritage Listings Committee has also considered a request for an Interim Heritage Order at its meeting held on 2 August 2020 and resolved:

'To recommend to the Minister that an Interim Heritage Order for the MLC Building be made pursuant to section 24 of the Heritage Act 1977 to enable that further inquiry be undertaken as the item is under immediate or imminent threat of harm.'

The site is not listed on the Register of the National Trust of Australia (NSW) however, the property is listed on the Australian Institute of Architects National Register of Significant Twentieth Century Architecture.

2. HERITAGE SIGNIFICANCE

Further research and an assessment of significance has been undertaken in the course of assessing the development application. The building is considered to meet the following NSW Heritage criteria for heritage significance:

- a) **Historical Significance** – The MLC state headquarters at North Sydney was constructed by prominent master building firm Concrete Constructions Pty Limited to the design of architects Bates Smart McCutcheon [BSM]with Associate Architects Hennessy, Hennessy & Co from 1955 to 1957. It is a

fourteen storey cubiform building in the Post-War International style that is a pioneering work in the development of high-rise buildings in Australia.

The design is based on designs of influential architects Ludwig Mies van der Rohe and Le Corbusier in the 1920-30s who both published designs for high-rise glass and steel buildings that were never conceived. In 1936, Le Corbusier acted as a consultant to a team of South American architects, including Oscar Niemeyer to design the new office for the Ministry of Education and Public Health in Rio Janeiro, Brazil. Most of this building's characteristics including the height versus site coverage, the solid end walls, air conditioning and open planned office spaces were incorporated into the design characteristics of the MLC Building.

The MLC Building embodies the sleek, recognisably modern prismatic form that had previously been employed by successful American corporations and government including the UN Secretariat Building, New York which was conceived as a 39 storey vertical city to serve the new post-modern international community and Lever House, New York, for the soap making company Lever Bros. It is the first lightweight freestanding modern office building in Australia which used this American model of a modern, well-serviced workplace with modular open plan spaces and was fully air conditioned with an entire room set aside for centralised air conditioning controls. The style of the building, and its association with the latest American trends in design and business, was central to the rebranding of the client company, MLC, which had been in business in Australia since 1886. MLC subsequently employed Harry Seidler to design their next office tower in Sydney, the largest in the city when it opened in 1977.

There was much that was unprecedented in the North Sydney MLC building. It was the largest office block in Australia when completed in 1957. The floorplates were largest ever used. The aluminium-framed glass exterior walling system, sometimes called a 'curtain-wall' had not previously been seen in Australia. The building pioneered techniques such as a second skin of glazing 250 mm inside the curtain wall so that the heat load from the western sun could be accommodated by contemporary glass specifications and the air conditioning technology. The MLC Building and the national heritage-listed ICI House, Melbourne (also designed by Bates Smart McCutcheon and completed 1955-1958), are the two most significant examples of glazed curtain-wall skyscrapers in Australia.

The architects' integration of modern art into the design within the interior and exterior with works by significant artists Andor Mészáros (bronze bas-reliefs), and Gerald Lewers (front garden and stones) also contribute to its significance and influential design. The most obvious comparative example is Tom Bass's 1960 artwork, *Amicus Certus in re Incerta*, on the AMP Building at Circular Quay which surpassed the MLC block as the country's tallest office when completed in 1962.

The building is assessed as having national historical significance.

Jennifer Taylor 'Tall Buildings: Australian Business Going Up 1945-1970'



MLC, VIEW FROM NORTH WEST, LATE 1950s

Source: Jennifer Taylor, Tall Buildings Australian Businesses Going Up 1945-1970

- b) **Associative Significance-** The work is an example of the work of the architects BSM who were influential in the design of high-rise buildings in Australia. The design was finalised after a study trip to the United States where Sir Oswald McCutcheon spent time working with the American practice Skidmore Owings & Merrill who were practitioners of the International style, with many of their designs such as Lever House being identified as icons of American modern architecture.

BSM had worked for MLC since the 1930s. Earlier works included the MLC Building in Martin Place, constructed in 1937. These buildings comprise a body of work that explored structural innovation, technical innovation and advanced environmental control with the architects engaging with a team of specialised consultants throughout the whole design process. Unfortunately, the majority of the earlier BSM buildings have been modified, adding to the significance of the MLC Building at North Sydney.

MLC Brisbane, 243 Edward Street, Brisbane - This building has been refurbished internally and externally. The façade and front awning have been replaced, thus de-valuing its design integrity.

MLC Newcastle, 438 Hunter Street, Newcastle - This building has also had its façade replaced with aluminium cladding and a glass canopy has been attached. Nothing remains of its original character.

MLC Perth, 171-177 St Georges Terrace, Perth - This building was stripped back to its steel frame during the 1990s and its use altered to mixed use. The floorplates were extended at the front and rear and balconies added. The original form, detailing and character has been lost.

Beacon House, 181-191 Victoria Square, Adelaide -This building retains its design integrity and is widely regarded as an outstanding example of the International style. This was acknowledged in its state listing in 1986.

MLC Building, North Sydney, has additional associative significance because of the involvement of Concrete Constructions Pty Ltd, a major construction firm in New South Wales from 1916 whose notable projects include work on the Mark Foys department store in the 1920s and the Government Savings Bank in Martin Place, MLC Building Martin Place (1938), King George V Memorial Hospital (1939), Royal Canberra Hospital (1942), Qantas House (1957), AMP Building Circular Quay (1962) and Centrepoint Tower (1970).

The building also has associative significance with the significant artists Andor Mészáros who created the bronze bas-relief on the tower as well with Gerald and Margot Lewers, the creators of the sculpture garden at the entrance. (See further information in (c) Aesthetic Significance, below.)

The building is assessed as having state associative significance.

- c) **Aesthetic Significance** - The building occupies an important place in the development of high-rise buildings in Australia. It is one of the first true high rise buildings and the first free-standing office building with setbacks from all boundaries creating landscaped spaces at ground level. Its use of materials such as light weight steel, the curtain wall facade and terracotta glazed bricks is representative of the Post-War International style of architecture that predominated in these early commercial high-rise buildings. It characterises the values of rationality, efficiency, integrity of materials, functionality and the use of technology. The exterior of the building is essentially intact with only the removal, in 1987, of the original entrance stairs to the Upper Ground Foyer and Lift Lobby and subsequent replacement entrance at the Ground Floor.

McCutcheon's desire for his buildings to integrate modern art within the fabric of the design is demonstrated by the inclusion of the work of Andor Mészáros (two bronze bas-reliefs of which one remains), and Gerald and Margot Lewers (front garden and stones). The MLC gardens can be seen as an evolution of the factory garden movement, evident at sites such as Davis Gelatine (Australia) Ltd in Botany, BHP (1923) in Newcastle and Sweetacres in Rosebery (1924), whereby pleasant surrounds were designed at the time of construction for the welfare of workers. This 'enlightened capitalism' was more apparent in the MLC building through the provision of squash courts and an outdoor terrace within the building. These were new concepts in office design.

Whilst modernist residential garden design in Australia dates from the 1930s, with projects such as Paul Sorensen's pool terrace at the Everglades in Leura, Walter McCutcheon's design is an early commercial

expression of the modernist garden, one which borrows from Le Corbusier. It scrapes clean the front setback to planar lawns so that the building is seen as a sculptural object. The western garden on Miller Street provides an integrated setting to the building rather than one that is merely decorative. One passes between four Plane trees (originally six) planted along the frontage before entering. This differs from Harry Seidler's Rose Seidler House which sits above and separate from the landscape and later modernist designs where buildings respond organically to the topography and setting with terraced and stepped forms using muted materials. The intended screen of deciduous leaves in front of the glass curtain wall is most obvious now that the trees have matured.

The building's original entrance was emphasised by the modernist sculpture garden designed by Gerald and Hettie Margaret (Margo) Lewers that also assisted in forming an integral element of the original design of the office development. The use of river rocks, sculpted sandstone and desert succulent plantings was also used by the Lewers in their design for the gardens of McCutcheon's ICI House, Melbourne (1955-58), which forms an integral part of its recognised national significance

There are seven large biomorphic carved sandstone blocks which are reminiscent of the work of Henry Moore, situated with smaller stones in a bed of pebbles from the Nepean River. All are interspersed with exotic succulent plants, including Yuccas and Agaves, that themselves exhibit a strong sculptural quality, and were not common in Australia at that time. The curvaceousness of the sculpted stone provides a counterpoint to the geometric and repetitive design of the building.

Gerald Lewers was a significant member of the artistic community being a foundation member of the Society of Sculptors and Associates which successfully campaigned to have sculpture included in new developments. The MLC pieces are significant as surviving examples of his later major commissions. In an obituary to the artist, novelist Patrick White described the pieces as among Lewers' most 'memorable' sculptures'. A photograph of the work was included in the memorial exhibition to the artist held at the Art Gallery of New South Wales in 1963. The artist Peter Pinson OAM, describes Lewers as 'a central figure in precipitating the penetration of Modernism into Australian sculptural practice'. The Lewers family home is now the Penrith Regional Art Gallery.



The Lewers Sculpture

On the southern façade of the MLC Building is a metal bas-relief sculpture of the MLC logo, 'Strength in Unity' by Andor Mészáros. It depicts a man attempting to break up a bundle of rods, a motif derived from a fable attributed to Aesop. It is an early surviving example of a modernist sculptural work commissioned for a commercial building. The bas-relief typifies Mészáros' work being an image of a stylized figurative human form, showing endurance in adversity. The style of the artwork is as much important as the subject matter itself and is contrapuntal to the simplicity of the stark South Elevation which is covered in 94,000 charcoal grey glazed ceramic veneer blocks.



The bas-relief by Andor Mészáros on the South Elevation.
 Photo: Max Dupain 1957, Stanton Library Local Studies Collection.

Mészáros was a Hungarian born émigré who arrived in Australia 1939. He quickly established a profile as a sculptor of note. His works included a series of three carved stone figures for Royal Prince Alfred Hospital, Sydney: ‘Motherhood’ (1944), ‘The Surgeon’ (1945) and ‘King George V’ (1946). Among his larger commissions were the hanging rood in the transept of the Cathedral Church of St Peters, Adelaide (1955) and ‘Christ Accepts His Cross’, a bronze figure in All Saints Church, Brisbane (1962). Mészáros’ bas-reliefs in stone and bronze adorn several buildings. ‘The Resurrection’ is a sandstone reredos on the rear wall of the Chapel at the Shore School in North Sydney. There is a memorial to Charles Ulm at Kingsford Smith International Airport, a piece at the Shrine of Remembrance in Brisbane, and at the Supreme Court in Darwin as well.

Mészáros won several international design competitions, including First Prize in the World Exhibition of Medallions in Madrid in 1951 and the ‘purchase prize’ at the International Medallion Competition in Arezzo, Italy in 1964.

Mészáros also created hundreds of medals for significant events, Australian art, history and culture, sport and war as well as celebrating the contributions of Australian leaders in the medical, scientific and artistic fields. His work is represented in collections in the UK including the Royal Collection, seventeen medals at the British Museum and seven silver figures plus the reredos (screen to the altar) at St Andrews Chapel, Canterbury Cathedral. There are five prints and drawings at the Museum of Fine Arts Budapest, Hungary.

Museum Victoria holds the largest collection in Australia of his work including over 40 items such as official medals with images of nature, sport and culture including Olympic medals from the Olympic Games, Melbourne 1956 and the Vietnam Medal for those that served in Vietnam from 1964-1973. There are seven medals held at the Australian Sports Museum at the MCG.



The Participation Medal, Melbourne Olympics 1957

Source: <http://www.olympic-museum.de/pmedals/olympic-games-participation-medals-1956.php#:~:text=Commemorative%20Medals%201956,reverse%20of%20the%20commemorative%20medal.>

The building therefore meets this criteria of aesthetic significance at a national level.

- d) **Social/Cultural Significance** - The MLC building is held in high regard by the design and architectural community. It is listed on the Australian Institute of Architects National Register of Significant Twentieth Century Architecture.

Docomomo Australia and Docomomo International (the International and Australian Committees for Documentation and Conservation of Buildings, Sites and Neighbourhoods of the Modern Movement) placed the MLC Building on their Register in 2004 and concurs with the NSW Heritage that the building reaches state, if not national significance in their submission.

The building is also documented in the following architectural books:

Jennifer Taylor (University of Sydney & Queensland University of Technology), *Tall Buildings: Australian Business Going Up - 1945-1970*, 2001. A chapter is devoted to MLC buildings including the North Sydney MLC Building.

Philip Goad (University of Melbourne), *Bates Smart: 150 Years of Australian Architecture*, 2004- Philip Goad states that Bates Smart McCutcheon 'attained the status of an Antipodean Skidmore Owings and Merrill (SOM), the corporate architectural firm par excellence' (page 162) and 'Of all the projects, it was MLC in North Sydney that was to be the most impressive exposition of BSM's newly acquired expertise. ... the Sydney building was at the time the largest office building in Australia.'

Noni Boyd & Scott Robertson, *Australia Modern: Architecture, Landscape & Design* (2019)

Harry Margalit, *Australia Modern Architectures in History* (2019)

Hericon Consulting Pty Ltd, *The Modern Movement in New South Wales: A Thematic Study and Survey of Places*, (2013). This work identifies the MLC Building as a significant representative building of the modernist movement in NSW.

The building is also socially significant as being the first office building to provide major recreational facilities for the employees. It is significant for providing office space for a large number of office workers in a single building. It is socially significant as the flagship national headquarters of MLC in response to a national expansion to raise their public profile. It is also socially symbolic for the growth and increasing importance of North Sydney as a major commercial district.

The site meets this criterion at a national level.

- e) **Research Significance**- It is unlikely that there is any archaeological research potential due to the site coverage of the building, with an estimated 50,000 tonnes of soil and rock having been excavated in site preparations in 1955 which were then used by North Sydney Council for its parks and gardens.

The MLC building was the largest office building in Australia on its completion in 1957 and its design and construction method was a most influential and important piece of architecture of national significance. The building therefore has potential to provide information about the construction techniques, construction materials and services introduced into Australian in the 1950s including the curtain wall technology. It is considered to have further research potential and is considered to be state significant.

- f) **Rarity**- The building is a significant example of Post-War architecture in the International style of rare quality, size, scale and age which makes it a rare example state-wide. It therefore is considered to meet the criteria for state significance and potentially national significance. As noted, Beacon House in Adelaide is the only other modernist MLC Building in Australia has retained its architectural integrity.

- g) **Representative Significance** - This item is assessed as historically representative in nationally for its importance as a seminal work of high-rise buildings. This item is assessed as aesthetically representative in the state for its use of modernist design and new technologies. This item is assessed as socially representative nationally by being listed on the Australian Architects Register of Significant Twentieth Century Architecture.

3. HERITAGE IMPACT ASSESSMENT

a) North Sydney LEP 2013 Clause 5.10

An assessment of the proposal, with reference to the following Clause of the North Sydney LEP 2013 has been made:

5.10 Heritage conservation

(1) the objectives of this Clause are as follows:

(a) to conserve the environmental heritage of North Sydney

(b) to conserve the heritage significance of heritage items and conservation areas, including associated fabric, settings and views

(4) The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned.

The proposal cannot be supported as it fails to conserve the heritage item as it will result in its complete demolition. The proposal is also completely contrary to the conservation policies established in the MLC Building Conservation Management Plan for Lend Lease Interiors, by Jackson Teece Chesterman, Willis Consultants Pty Ltd.

b) North Sydney DCP 2013

An assessment of the proposal, with reference to Part B Section 13 of the North Sydney DCP 2013 has been made with the following elements of the DCP being of note:

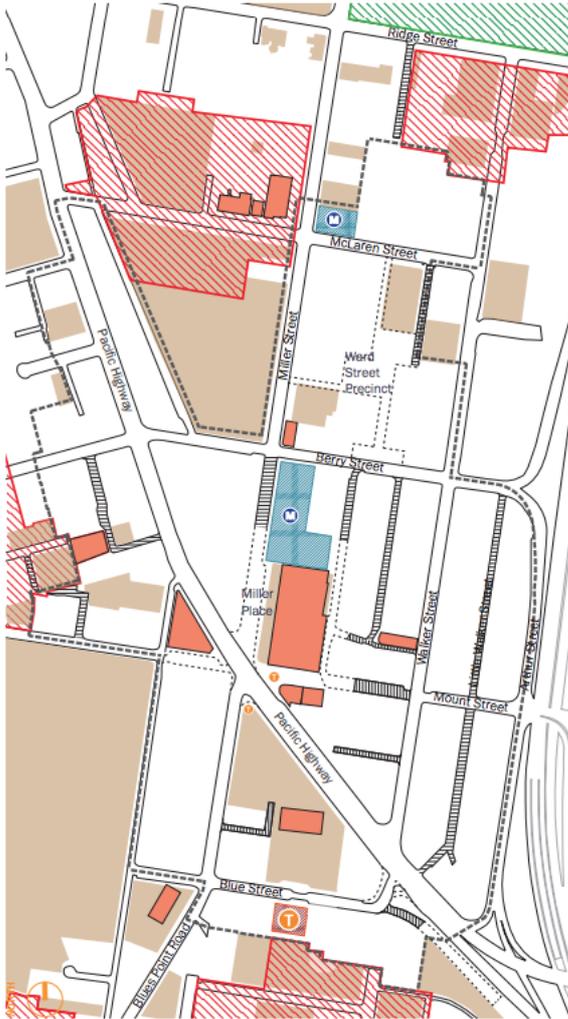
13.1.8 Heritage Applications - Development Applications (a) For development applications for heritage items and buildings in heritage conservation areas may require: (i) A Heritage Impact Statement- The submitted Heritage Impact Statement by the applicant's consultant RPS Group does not adequately assess the heritage significance of the building and places too great an emphasis on the loss of significance resulting from replacement of the façade. As its pioneering role as a high-rise building will remain and the form, massing, scale and detailing of the building will continue to contribute to its primary significance, there is no need to de-list the building if the façade is replaced. ICI House, Melbourne had its western facade sympathetically replaced in 1962 and Lever House, New York in 2001 and both are still heritage-listed.

13.4 Development in the Vicinity of Heritage Items- The subject property is located in the vicinity of several heritage items as shown in the images below.



Heritage Listings in the Vicinity of the MLC Building
Source RPS Australia East Pty Ltd. 105-153 Miller Street, North Sydney Statement of Heritage Impact.

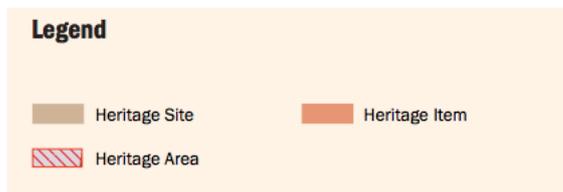
The site is also identified in the North Sydney Public Domain Strategy as contributing to a CBD with a 'strong and rich heritage'.



Heritage

North Sydney CBD has a strong and rich heritage with numerous sites listed on the heritage register. This rich history is celebrated under the Public Domain Strategy with proposed open spaces and laneway upgrades designed to enhance their presence in the public domain.

Public art will also reference and reinterpret the history of the area. Sites including the Tramway Park are proposed to be reopened to the public and transformed through respectful adaptive reuse.



Heritage in the Public Domain Strategy

Source: *North Sydney Public Domain Strategy*, March 2020, Pg18

The MLC Building has been identified by North Sydney Council as contributing to the heritage character of the commercial area. Its removal and replacement with a larger scaled contemporary building with less streetscape contribution will negatively detract from the heritage significance and setting of other heritage items located nearby including the former Bank of NSW (I0919), Façade of the S. Thompson Building at 67A Mount St (I 0920), Façade of Shopfront at 69 Mount St (I0921) and the North Sydney Post Office and Court House (I0953). Note that the GPO Column (I0922) has been removed from Brett Whitely Plaza (Mount Street).

13.5.1 Heritage Items – Objective O1 – Ensure changes to heritage items are based on an understanding of the heritage significance of the heritage item- The submitted proposal does not comply as heritage items are to be conserved not demolished. The demolition of the heritage item does not respond to the significance of the item and is not a reversible outcome. The proposed replacement building in no way mitigates the loss of the building and it is not a reinterpretation of it.

Provision P1 Retain features (including landscape features) that contribute to the significance of the item- The proposal does not comply as the lawns and Lewers sculptures will be demolished.

P3 New work is to be consistent with the setback, massing, form and scale of the significant features of the heritage item- The proposal does not comply as the replacement building higher at 27 storeys with a trapezoidal form as opposed to the MLC Building which is 14 storey in height and uses rectangular prismatic forms.

P4 Retain significant fabric, features or parts of the heritage item that represent key periods of the item's history or development- The proposal does not comply as the whole building will be demolished.

P6 All works are to be consistent with an adopted Conservation Management Plan/s where applicable- The demolition proposal is inconsistent with Policies including but not limited to Nos. 1.1, 1.2, 1.3, 1.4, 1.7, 1.8, 2.1, 3.1, 3.2, 4.1, 4.2, 4.3, 4.4, 4.7, 5.1, 6.1, 6.3 and 6.5. in the Conservation Management Plan for Lend Lease Interiors Pty Ltd prepared by Jackson Teece Chesterman Willis Consultants Pty Ltd, 1998 Volume 1.

13.5.2 Form, Massing and Scale - Objective O1 To allow new alterations and additions to heritage items, where new work does not impact on the heritage significance of the heritage item- The proposal does not comply as the alterations include complete demolition and the works impact negatively upon the building's significance.

Objective O2 To maintain and promote the original built form of the heritage item as viewed from the public domain- The proposal does not comply as the view of the building will be completely removed due to its demolition.

Provision P4 Maintain the integrity of the building form (including the roof form and profile) so that the original building is retained and can be clearly discerned- The proposal does not comply as integrity of the building will be lost due to its demolition.

13.5.5 Interior Layouts – Objective O1 To ensure that significant interior elements are retained and preserved- The proposal does not comply as the significant interiors will be demolished including the floor layout, lift core, room configuration, inner stairwell, staff dining hall/auditorium and associated kitchen, toilets and squash courts.

13.5.6 Upgrading for Fire Safety, BCA – Provision P2 Fire and other upgrades are to be consistent with the heritage significance applicable to the property. Upgrades and replacement of balconies, stairs, timber windows etc are to be sensitive to that significance- The proposal does not comply as the building may be retained and upgraded whilst sensitively retaining its heritage significance.

Provision P3 Fire and other upgrading works need to balance the fire safety and other compliance needs with protecting heritage significance. In order to achieve the most appropriate outcome, applicants may need to utilise alternate solutions to BCA compliance issues – The proposal does not comply as the proposed outcome of demolition does not protect the building's heritage significance.

13.8 Demolition - Objectives O1 To ensure that heritage items and buildings which positively contribute to the significance and character of a heritage conservation area retained.

O2 To outline the criteria which need to be considered by Council should applicant still seek to demolish the heritage item or building which positively contributes to a heritage conservation area.

Provisions Demolition of heritage items P1 Heritage items must not be demolished and demolition will not be supported by Council.

P2 Despite P1 above, Council may consider the demolition of a heritage item, but only where an applicant can satisfactorily demonstrate:

(a) why it is not reasonable to conserve the heritage item taking into consideration:

(i) The heritage significance of the property; and

(ii) the structural condition of the building; and

(iii) pest inspection reports; and

(iv) whether the building constitutes a danger to the public.

Note: A report from a qualified quantity surveyor is required where the costs of retention are part of the justification for the proposed demolition.

The proposal does not comply as the building has been assessed as having state and potentially national significance and it is structurally sound. The building is a viable commercial building currently used by MLC as well as also leased to others and therefore cannot be described as being a danger to the public.

(b) that alternative options to demolition have been considered with reasons provided as to why the alternatives are not acceptable.

Note: Plans of the replacement building are to be lodged concurrently so that the applications can be assessed concurrently- The proposal does not comply as the reasons for alternative options are not based on judgements of heritage significance but have been based on economics. The environmental reasons are also sceptical as the embodied energy of the existing building has not been submitted and is likely to be extremely high due to the extensive use of aluminium used on the facades which would have had a high energy consumption when manufactured.

13.11.1 Commercial and Office Buildings- Objective O2 Conserve important building elements and features including significant facades, fenestration patterns, decorative details, external materials and internal lobbies- The proposal does not comply as the building will not be conserved but is to be demolished. Other glazed curtain walled exemplar Modernist office buildings have been conserved including the United Nations Headquarters in New York (1952), the Inland Steel Building in Chicago (1956-8), Lever House, New York, the Crown Zellerbach Building in San Francisco (1959) and ICI House, Melbourne (1955-8).

3. Conclusion

The proposed demolition of a heritage item that is assessed as having national heritage significance and is capable of conservation and continued use ,cannot be supported.

The proposal will remove a building identified in Council's *Public Domain Strategy* as contributing to North Sydney's heritage character. It will also result in the loss of a building that has been identified as a potential state item by Heritage NSW, as a 'Significant Twentieth Century Building' by the Australian Institute of Architects and by DOCOMO as a nationally significant building, and that is unique within North Sydney. The proposal is also contrary to the Conservation Management Plan for Lend Lease Interiors, by Jackson Teece Chesterman, Willis Consultants Pty Ltd that was prepared for the building.

It is recommended that the application be withdrawn or refused.

Lucinda Varley
Conservation Planner