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The Department of Planning
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Dear Sir/Madam

Draft Sirius SEPP submission

The draft SEPP for 36-50 Cumberland Street, The Rocks (the Sirius site) should be withdrawn. There are a number of errors and omissions in the Heritage Impact Statement by Architectural Projects (the HIS) which understate the significance of the existing building. This compromises the key recommendations proposed which are only intended to shape a new development. The sale of the site must be postponed until there are new development controls drafted which incorporate a conservation management plan for the retention of the building.

The HIS is blinkered and flawed. It proceeds from the foundation that the building does not deserve to be retained. Inexplicably, the HIS does not accurately document the building's significance which is in fact recognised by:

- The NSW Heritage Council
- The National Trust
- The Australian Institute of Architects
- The City of Sydney
- ICOMOS
- DOCOMOMO
- The World Monuments Fund
- The Historic Houses Association
- The Twentieth Century Heritage Society of NSW & ACT

To blithely state that Sirius is not identified by statutory protection is to ignore the Heritage Council's unanimous recommendation that it should be. It is also listed on the Section 170 Heritage and Conservation Register of the Land Housing Corporation NSW.

It ignores the groundswell of public support and the extensive community campaign underway over the past three years to argue for its retention. APPENDIX A - THE HISTORY OF THE SITE considers that "contemporary" comments stop in 2002 - there is no mention of the Save Our Sirius foundation's work, nor is there recognition of the advocacy of the Millers point Resident Action Group.

I do not support the sale of the Sirius site. It is not surplus to public housing requirements - there is a shortage of both social and affordable housing in the inner city area. To be removing stock in the face of this shortage is extraordinary.

The government's position that it cannot "afford" to keep this valuable site in public hands must now be challenged. In 2014 the earliest canvassing of options led to the extraordinary assertion that the Sirius site was a cash cow which could raise \$100 million if sold off for 250 luxury apartments. The folly of this thought bubble has now been fully exposed - the development yield for the site is a fraction of this first estimate. The maximum gross floor area proposed under the draft SEPP amendment would allow approximately 85 residential apartments. This represents a net gain of 6 apartments from the destruction of a landmark building and its residents.

A sea change is underway globally on the importance of affordable housing options in our cities, and on the relevance of urban communities that maintain a mix of housing types. The City of London has announced that any new development on current housing sites should be 30 per cent social, 30 per cent affordable and a further 40 per cent local affordable. Private sector development that displaces public housing is now being categorised as social cleansing.

<https://www.thefifthestate.com.au/innovation/residential-2/lease-london-project-on-hold-after-social-cleansing-claims/97674>

The social significance of Sirius is well established. It is a product of the original Green Ban in The Rocks and Millers Point. It was conceived in a battle for human dignity and community. It appears that its continuing legacy is to be an enduring reminder of the importance of collective housing in the heart of Sydney at a time when access to housing is more problematic than ever.

The design significance of Sirius is less well understood as many members of the public, and many ministers in the Liberal Government, glibly dismiss the building's brutalist aesthetic. And yet here too, there has been a growing chorus of opinion and commentary to argue the merits of many Brutalist landmarks – including Sirius. There is a new appreciation for the buildings from the '60s and '70s now we are facing greater challenges of building sustainably in ways that express individuality and solve communal needs. Moshe Safdie's Habitat building in Montreal, a 1967 forerunner of Sirius, continues to be loved by both residents and the design community. Habitat pioneered core ideas that are still highly relevant today - a recent profile singled out its exploration of "how to make a place for living in a city that is spatially generous, efficient and with an abundance of natural light and outdoor space – while retaining a similar density to a traditional tower block. And with a strong emphasis on people and community".

<https://www.dezeen.com/2014/09/11/brutalist-buildings-habitat-67-montreal-moshe-safdie/>

The poor quality documentation and flawed analysis on display in this draft SEPP is a matter of embarrassment for the Department of Planning and Environment. It's no consolation that any new building could be a modest redevelopment with minimal impact on The Rocks precinct.

The option of adaptive reuse of the existing building needs to be framed with a commitment to both the built and the social significance of this community benchmark. It must be documented in a Conservation Management Plan that acknowledges both the quality of the design and the trauma caused by the forced eviction of the Sirius community.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sue Wittenoom', with a stylized flourish extending from the end.

Sue Wittenoom

NSW Registered Architect 5521