

Millers Point Community Resident Action Group



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Tahlia Alexander

Assessment Planner, City of Sydney

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Dear Tahlia

RE: D/2020/182 – 87 Lower Fort Street, Millers Point

Millers Point Community Resident Action Group would like to make the following comments and objections to the DA for demolition of the Former Baby Health centre at 87 Lower Fort Street, and the subdivision of the site.

1.0 Need for concurrent Demolition and Construction application

On the 10th April 2020, the Millers Point Community Resident Action Group wrote to you with the following request:

The community of Millers Point does not accept that the future 'comprehensive development' of the site is a matter that can be left to a future DA, presumably after a future sale, and possibly to a developer who quite correctly would say that their purchase was made without any indication from the government or the council about what was expected to be achieved on the site. We note the many councils require a concurrent application for demolition and construction in a heritage conservation area. These are generally areas of much less historical importance than Millers Point (eg Willoughby Council DCP).

While we did receive a reply from you on the 14th April regarding other matters of concern in the letter, you did not address this important request.

The supporting documents for D/2020/182 confirm the need for a concurrent construction DA and demolition DA in the following ways:

- The HIS dismisses many potential impacts of future development on the site, such as impact on views, simply because it's 'just a demolition' DA.
- The full impact of the demolition of the current building leading to development of the site is not addressed in any of the supporting documents.

2.0 Heritage Objections

2.1 Laneway amalgamation

'The City of Sydney Policy for the Management of Laneways in Central Sydney' states:

Submissions to the Central Sydney Planning Inquiry in August 1992 noted that laneways in the city were being lost and that therefore something of Sydney's unique scale and character had vanished. This observation was linked to a criticism of the practice of site amalgamation...

The baseline Archaeological Assessment shows the lane appearing on a 1900 plan:



Figure 2.13 1900 Resumption Plan.
Gives an outline of the extensions made to the original site building and outlines the portion of land owned by James Merriman. Rocks and Foreshore Resumption plans (1900, plan R), Historical Atlas of Sydney.

Clearly, given the diminishing number of lanes in Sydney, and the importance of the land as part of the state significant fabric of Millers Point, the lane should be transferred to the ownership of the City of Sydney so it can be managed as a public laneway by the City of Sydney. The lane is paved with historic bluestone pavers which need to be maintained in accordance with their significance, for the public benefit, by the City of Sydney, and not entrusted to a private owner.

1.2 Archaeology

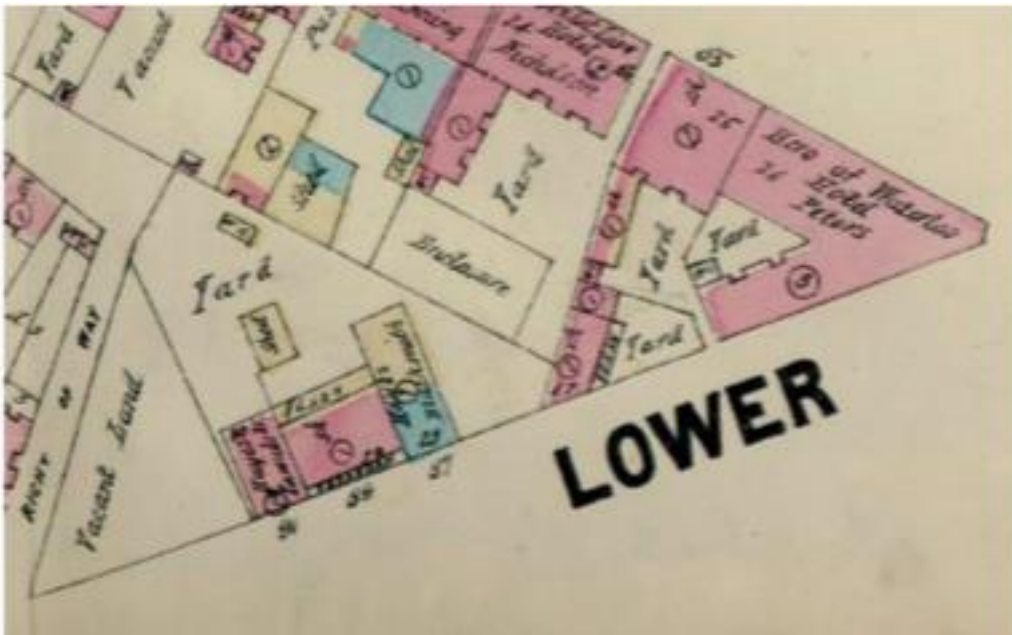
Both the HIS and the baseline Archaeological Assessment concludes that the site contains the potential for underground archaeology of state significance to exist.

Given such potential, the community of Millers Point would be very keen for the following to take place:

- full public consultation before any archaeological work begins,
- public open days during excavation,
- information sessions and
- responsible display of any deposits recovered – i.e. not be boxed and archived but displayed and interpreted for the public benefit.

1.4 Subdivision of the site

The HIS puts forward the argument that the proposed sub-division follows the 'historical breakup of the lot' as shown on the Percy Dove plan of 1880, which showed a single cottage at 85 Lower Fort Street and shops and residence at 87 Lower Fort Street, as shown below



Detail from Percy Dove's Plans of Sydney Blocks 37 and 53 dated 1880 showing the Hero of Waterloo Hotel, the single storey cottage at 85 Lower Fort street and the shops and residence at 87 Lower Fort Street (numbered at this time as 81, 85 and 87 Lower Fort Street)

Source: *Historical Atlas of Sydney (Urbis HIS 2020: 17)*

If this is the intention, then why not sub-divided the block exactly as in the 1880 plan, leaving one small vacant lot next to the laneway and one block for mixed development?

1.5 Twentieth century significance of Millers Point

The HIS gives the following assessment of Historical significance for the building:

No. 87 Lower Fort Street is of historical significance on a Local level for its contribution to the significant history of the Millers Point and Dawes Point Precinct as one of a small number of community facilities constructed in the locality following government resumption in the early 1900s. (Urbis HIS: 24)

And the following assessment of its rarity:

As a former Baby Health Centre building located within Millers Point and built during the mid-20th century by the City of Sydney Council, the place is considered uncommon within the context of the historic development of the locality, which in the main occurred throughout the 19th century, ceasing in the early 20th century with government resumption of the majority of the properties.

One of a small number of community facility buildings constructed in the locality in the mid-20th century, 87 Lower Fort Street is a notable anomaly in the history of the development of Millers Point and this makes the property unusual in the local context. (Urbis HIS: 28)

And yet, despite this assessment of significance and rarity, the HIS concludes that:

(a) The proposed demolition of the existing building on the subject site and the proposed subdivision of the site will not detrimentally affect the significance or character of the Millers Point locality. The existing building on the subject site is a mid-twentieth century structure, and although it has been identified to have some degree of social significance, the building does not positively contribute to the broader historic landscape and character of the locality (Urbis HIS Feb 2020: 40).

Yet again, evidence of the hundred years of social housing in Millers Point is being removed in favour of a sanitised version of the area as being one of grand 19th century gentlemen's residences. The HIS states that the building is an 'anomaly' in the area and is rare and of local significance. Yet this is not enough to prevent demolition of this rare anomaly. Currently, the only remaining evidence of the social housing occupancy of Millers Point is the Harry Jensen Centre, built at the same time as the Baby Health Centre. Both these buildings demonstrate an era when both local and state governments worked together to provide needed housing and amenities for low income citizens. Other cities of the world such as New York, Glasgow and Dublin have house museums which tell the story of 20th century tenement/social housing. Millers Point, indeed Sydney, has no such house museum, and indeed no interpretation at all of the lives of people who occupied the area as social housing tenants for 100 years.

In these times of change and uncertainty, it is important to understand how our governments responded to the needs of its vulnerable citizens in the past, and learn from these practices. If the demolition of the Baby Health Centre is to

proceed, then some of the proceeds of the sale should be put towards the establishment of a centre that will interpret the hundred years of social housing in Millers Point.

1.6 Significant views

The HIS states that:

(e) The proposed subdivision and demolition of the existing building will not affect any existing significant views or sightlines.

Correct – demolition rarely affects views. However, the report fails to comment on the potential for loss of views from the next stage of development – the construction of two new dwellings. Hence the need to have both a DA with building envelopes as well as a DA for demolition.

3.0 Summary

In summary the CRAG objects to the following aspects of D/2020/182:

- *That the DA only covers demolition and site remediation, not future development.* The DA should be refused and re-assessed in conjunction with envelopes for future development. This is a crucial point.
- *That the DA includes amalgamation of the laneway into the adjacent lot.* The lane should be transferred to the City of Sydney to be managed under their development instruments and Laneway Management Policy.
- *That the Archaeological work to be undertaken on the site, which has been assessed as having the potential to contain archaeological deposits of state significance, should be carried out with full public consultation, public open days, information sessions and responsible display of any deposits recovered.*
- *That consideration should be given to leaving the block adjacent to the laneway as vacant land, and only developing the block adjacent to 85 Lower Fort Street, in accordance with historical use of the land as shown on the Percy Dove plan of 1880.*
- *That the history of the hundred years of social housing in Millers Point should not be systematically eradicated (as is currently taking place) and*

that the City of Sydney and LAHC should take responsibility for finding ways to commemorate this important aspect of Millers Point, and NSW', history and significance.

With regards

A handwritten signature in black ink, appearing to read 'Anne Warr', written in a cursive style.

Anne Warr, FRAIA, PhD
President
Millers Point Community Resident Action Group CRAG

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