

6th November 2025

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RE: 105 Miller Street, Response to Submissions SSD-83956216 - New University Campus

To whom it may concern,

We provide this heritage justification letter in support of the proposed design prepared by Bates Smart for the Denison Street wing of 105 Miller Street. Bates Smart are the original architects of the former MLC Building (then Bates Smart & McCutcheon). Their continued involvement represents a rare and invaluable continuity of authorship, ensuring that any new works are grounded in an authentic understanding of the building's design philosophy and cultural significance.

State Design Review Panel (SDRP)

It is noted that the project team met with the State Design Review Panel (SDRP) for a third time on **2 April 2025** prior to lodgement. The Panel provided detailed design feedback, with particular focus on the façade expression. The key matters raised by the SDRP included:

4. Consider how the reimagining of the east wing can honour and represent these characteristics in a contemporary manner, so it retains a coherent and clear relationship with the historical form of the building and its four inter-related parts whilst inverting the minor and major forms.

The blue tiles on the podium currently potentially diminish the impact of the tiles on the southern facades of the Miller Street and Denison Street buildings. Resolve this by either:

6. Ensuring the southern facades of the Miller and Denison Street buildings are visually strong enough that they are not undermined by the blue on the podium.

7. Replacing with an alternative finish or colour that is complementary in character.

8. Reviewing the usability and appearance of seating on the podium around the planters and consider alternative arrangements that support student social activity and engagement.

9. Ensuring the stairs from Brett Whiteley Place provide sufficient depth for comfortable seating and social gathering in addition to safe movement.

11. Consider clearly articulating the building's form as one united plane, consistent with the original and test options to ensure it sympathetic with the proportions of the Miller Street façade.

12. Enable the north and south facade to read predominantly as a singular coherent surface – not a literal copy, but a contemporary interpretation that includes windows or some transparency. (precedents discussed were the use of screened windows with terracotta baguettes seen in the Macquarie Apartments and the New York Times Building facades).

The original western and eastern facades have a subtle complexity in the way they can be read as vertical, horizontal or mosaic patterns depending on the distance and viewpoint. The new proposals don't yet contain this level of detail and richness, which is important to represent given the significance of the heritage setting and the scale of the new built form.

13. Continue to develop the eastern and western facades of the Denison Street building to ensure they are consistent with the intent and character of the original curtain wall.

Bates Smart – The Original Architects

Bates Smart designed the MLC Building in 1955–1957 and were pioneers of Australian post-war modernist architecture. Their façade report¹ confirms the original design intent: absolute clarity, modular rigour, the expression of structure through lightweight curtain wall technology, and a disciplined honesty of form and function. Because Bates Smart understand the building's design logic from first principles, their approach to the new works is **not an external interpretation**, but a genuine continuation of architectural authorship.

Consistent with the Burra Charter, change to a significant place is most defensible when:

- it is based on a deep understanding of cultural significance (Articles 5 & 6); and
- it is undertaken by those who have a continuing association with the place (Article 7.2).

No other architect could achieve this level of fidelity to the original design intent.

Authenticity, not replication

The Burra Charter requires that new work be **distinguishable from old** (Article 22.2) and that reconstruction must **not create a false sense of history** (Article 20.1).

The new design is an authentic and contemporary interpretation of the Bates Smart original, grounded in the same design philosophy of proportion, structural legibility and innovation. It does

¹ Bates Smart 2025, Denison Street Façade Report, 105 Miller Street, prepared for Investa, November 2025.

not mimic the original façade or create a false historical narrative; instead, it expresses the next evolution of the building using 2025 materials, detailing and construction capabilities.

This approach honours the Burra Charter's intent by ensuring the new work is authentic and distinguishable, avoiding imitation while strengthening the building's continued legacy as a defining work of Australian modernism.

Demonstrating Compliance with Heritage Conservation Objectives

- **Authenticity:** Designed by the original architects, ensuring the strongest possible continuity of intent.
- **Legibility:** Old and new remain clearly distinguishable (Burra Charter Articles 20 & 22).
- **Hierarchy Retained:** Miller Street remains the architecturally dominant element.
- **Avoids Imitation of Original Fabric:** The project does not reproduce past fabric or create false history.
- **Spirit of Modernism:** The proposal upholds innovation — the defining characteristic of the original building.

Conclusion

The most respectful and defensible heritage approach is not imitation — it is evolution that remains true to the building's original architectural philosophy. The proposal by Bates Smart maintains hierarchy, ensures legibility, avoids false reconstruction, and reflects the same spirit of innovation that defined the building in 1957. For these reasons, the design should be supported as a heritage-led and authentic outcome.

Should you have any further questions please do not hesitate Celine Louizos celine@curioprojects.com.au or natalie.vinton@curioprojects.com.au

Yours sincerely,



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