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SYDNEY NSW 2000**

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14 December 2022

The Minister for Planning
NSW Government, Department of Planning, Industry and Environment
320 Pitt Street
Sydney NSW 2000

Dear Sir,

HERITAGE IMPACT STATEMENT | DEPARTMENT OF LANDS BUILDING (SSD 7484) – MODIFICATION 18 (CEILINGS)

1. INTRODUCTION

1.1. PURPOSE

This Heritage Impact Statement (HIS) has been prepared to assess the potential impacts of proposed modifications (described below) on the heritage significance of the Department of Lands Building (Lands Building), located at 23-33 Bridge Street, Sydney (the site). The site is currently undergoing major adaptive reuse works in accordance with SSD 7484.

The updated drawings submitted for Modification 18 Submission of SSD 7484 seek approval for the demolition of lath and plaster and coke breeze ceilings, following the outcomes of further investigation into the fire performance and structural stability of the ceilings undertaken by the consultant team.

The assessment carried out in this HIS relies on the architectural drawings and design statement prepared by Hassell dated 14 December 2022, the *Heritage Cornice Salvage Methodology* prepared by Traditional Restoration Company (TRC) dated 12.12.2022 and the *Methodology for Templating, Removal, Reinstatement and Reconstruction of Plaster Cornices* prepared by Purcell dated 14 December 2022, which have been submitted with this modification application.

Urbis has reviewed the proposals and supporting information and believe they represent an appropriate balance between the significant conservation works being undertaken, and the major adaptive reuse works which will provide the Lands Building with an appropriate and sympathetic new use.

1.2. METHODOLOGY

This HIS has been prepared in accordance with the guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance, 2013*, known as *The Burra Charter*, and the New South Wales Heritage Office (now Heritage NSW) publication, the *NSW Heritage Manual*.

The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words place, cultural significance, fabric, and conservation, is as defined in Article 1 of The Burra Charter. The NSW Heritage Manual explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

This report should be read in conjunction with the Lands Building Conservation Management Plan (CMP) updated by GBA Heritage dated May 2017 and endorsed by the NSW Heritage Council in June 2017.

1.3. LIMITATIONS

This report only addresses the relevant built heritage planning provisions and does not address general planning or environmental management considerations.

2. HERITAGE CONTEXT

2.1. HERITAGE LISTINGS

The following heritage listings are applicable to the site:

- Located within the *Governors' Domain and Civic Precinct*, a Listed Place on the Australian National Heritage List (Place ID 106103)
- Listed on the NSW State Heritage Register under the *Heritage Act 1977* (SHR No. 00744).
- Listed under Schedule 5 of the Sydney Local Environmental Plan 2012 (Item 1683) as a heritage item of State significance, identified as *Former 'Department of Lands' building including interior*.
- Partially included (northern portion) in the Bridge Street/Macquarie Place/Bulletin Place Special Character Area identified in the Sydney Development Control Plan 2012.
- Partially included (southern portion) in the Farrer Place Special Character Area identified in the Sydney Development Control Plan 2012.
- Listed on the Department of Land and Water Conservation, Section 170 Register (No. 54131).

2.2. STATEMENT OF SIGNIFICANCE

The following Statement of Significance for the Lands Building is drawn from the endorsed CMP for the Lands Building prepared by GBA Heritage, which in turn was drawn from the 2015 CMP:

The Lands Department Building has STATE (and possibly National) heritage significance.

It is an outstanding example of a late nineteenth century purpose-built government administration building and represents a major change in the way government departments were housed at the time. Directly associated with the influential and powerful Lands Department for most of its life, the Lands Department Building is one of a number of public buildings constructed at the time that gave civic expression to the significance of the government's role in guiding the colony's development.

The Lands Department Building is an exceptional example of a late-Victorian classical revival public building adapted for Australian climatic conditions with the addition of colonnades, verandas and central ventilation wells. The scale and style of the building, the use of a mix of Australian, British and classical decorative motifs and the inclusion of statues of famous Australian explorers and surveyors reflects the significant growth in national confidence and pride throughout the late nineteenth century, leading to Federation in 1901. This period marked a change in Sydney's identity from a provincial town to a city of standing within the British Empire and the world. The Lands Department Building is closely associated with a significant phase in Australia's history and in the development of the visual character and identity of Sydney itself during the late-Victorian period.

The building retains a very high degree of authenticity and integrity in its external form and detailing, its internal layout and decorative detailing, and its moveable heritage. The retention of the look, feel and spatial qualities of a late-nineteenth century building, combined with its complementary townscape, is rare in Australia.

The Lands Department Building is a very fine example of NSW Colonial Architect James Barnet's work and clearly demonstrates his skilful detailing of the classical style, combined with the beginnings of a more vernacular style for major public buildings. The building is also associated with the work of builder and notable citizen John Young, as well as the numerous State Ministers and Surveyor Generals who occupied offices in the building.

At the time of its construction the Lands Department Building was a landmark and it remains so today. It is particularly well known because of its portrait statues and its clock tower. Together with the Chief Secretary's Building, the former Treasury and the Education Department Building, the Lands Department Building contributes to one of the most intact late Victorian/early Edwardian precincts in Sydney. Forming the core of the colonial government administration, this monumental precinct reinforced the role and importance of government in New South Wales.

The Lands Department Building was notable at the time of its construction for its innovative use of fire-resistant materials, as well as its services including heating, lighting, ventilation and communication devices, which were at the forefront of technology. The building displays a high degree of technical achievement in its fine detailing and high-quality workmanship, both externally and internally; particularly its carved stonework, joinery, metalwork and decorative plasterwork.

3. HISTORICAL & PHYSICAL EVIDENCE

For detailed historical and physical analyses of the site, refer to the GBA CMP.

4. PROPOSED WORKS

The works which are proposed under this modification relate to the existing ceilings within the Lands Building, and are the result of ongoing testing of both the structural integrity of the ceilings as well as of contemporary fire-rating requirements. The proposed works entail the following:

4.1. DEMOLITION OF EXISTING LATH & PLASTER CEILINGS

- All existing lath & plaster ceilings to Lower Ground, Ground and Level 1 – which have been found to be largely in a state of failure – to be demolished.

4.2. NEW WORKS

- New fire-rated ceiling linings to be installed to Lower Ground, Ground and Level 1 in areas noted below
- New fire rated ceilings to be finished with a suitable coating that provides a visual outcome consistent with the original set plaster finish
- All rooms except for G.18, G.24 & 1.25 to include reconstructed cornices

4.3. CORNICE SALVAGE, REINSTATEMENT & RECONSTRUCTION

In determining the scope of work proposed to different cornices, the hierarchy of rooms was carefully considered with respect to the relative contribution that individual spaces make to the overall significance of the place. There is a clearly legible, 3-tiered hierarchy of rooms with the Lands Building which is largely in keeping with the gradings of significance for individual spaces as outlined in the GBA CMP, and reflecting the proposed use and public accessibility of the spaces. Methodologies for the salvage, reinstatement, and reconstruction of the cornices are outlined in the *Heritage Cornice Salvage Methodology* prepared by Traditional Restoration Company (TRC) dated 12.12.2022 and the *Methodology for Templating, Removal, Reinstatement and Reconstruction of Plaster Cornices* prepared by Purcell dated 14 December 2022.

The rooms and proposed works are as follows:

- 1. Publicly accessible principal spaces within the building, original rooms which are of exceptional or high significance (per the CMP) and which contain highly elaborate plaster cornices:** G.01 (Chief Surveyor's Room), G.04 (Records & Correspondent's Room) & G.07 (Minister's Room)
 - Salvage of sections of the existing plaster cornices where possible and in accordance with the methodology, and reinstatement in spaces from which they were salvaged.
 - Non-salvageable cornice sections to be reconstructed to match as per the methodology.
 - Moulds to be taken of existing cornice and beam profiles prior to any removal for recording and replication, in event of sections not able to be salvaged, as per the methodology.
- 2. Rooms of exceptional or high significance (per the CMP) which have high ceilings but less elaborate plaster cornices:** LG.01, LG.04, LG.10, LG.11, LG.40, LG.41, LG42a, LG42, G.10, G.13, G.15, G.19, G.20, G.36, G.37, 1.01, 1.04, 1.07, 1.11, 1.15 & 1.19
 - Moulds to be taken of existing cornice and beam profiles prior to removal as per methodology.
 - Reconstruction of existing cornice and beam profiles as per methodology and following construction of new fire rated plasterboard ceiling.

3. Secondary rooms (namely, smaller spaces) with lower ceilings and simple cornice

detailing: G.02, G.03, G.05, G.06, G.08, G.09, G.11, G.17, G.21, G.22, 1.02, 1.03, 1.05, 1.06, 1.09, 1.10, 1.12, 1.17, 1.18, 1.20, 1.21

- Moulds to be taken of representative cornice, typically found across these spaces, prior to removal and as per methodology.
- Reconstruction of typical cornice profiles as per methodology and following construction of new fire rated plasterboard ceiling.

4.4. RACETRACK CORRIDOR

- Removal of the existing coke breeze & concrete arched ceiling is required to achieve a 90min fire resistance level (FRL) in the following select sections of the racetrack corridor:
 - Lower-ground floor:
 - Northern corridor
 - Western corridor
 - Sections of the eastern corridor
 - Southern corridor groins
 - Ground floor:
 - Southern corridor groins
- Reconstruction of new arched ceilings and fire rating in the abovementioned corridors, to largely maintain existing original form and profiles
- Salvage & reinstatement of original surviving portions of Lyon and Cottier tiled and painted Royal Coat of Arms from the Bridge Street entrance lobby (note all grey tiles are new replacements, with no original tiles or evidence remaining under)

5. BACKGROUND TO PROPOSED WORKS

5.1. CONTEXT

5.1.1. Lath & plaster ceilings

The Lands Building contains a large extent of expanded metal & timber lath & plaster ceilings that have a history of failure. Some rooms contain extremely heavy decorative cornices which could endanger life if they were to fail, as they have done in the past.

The project's remedial structural engineer, Northrop, has carefully examined the historic ceilings from below and above, now that floorboards have been lifted and coke breeze material has been removed (as part of the now-completed Phase 1 works) allowing full access and assessment of the condition of the majority of the ceilings (allowing reasonable assumptions for non-accessed ceilings as based on the general condition of ceilings which have been accessed). While some sections of timber & expanded metal mesh lath & plaster ceilings have catastrophically failed in the past, Northrop's assessment is that all keys are variously compromised, and that the achievement of structural adequacy for the existing ceilings will require various strategies to be implemented. The client, Pontiac

Land Group (PLG) has also advised that even if these strategies could be successfully carried out and the existing ceilings retained & restored, certification and warranty limitations which can be provided by the Consultant and the Contractor would result in significant negative impact on the building's insurability and eventual occupation and use.

In addition to the structural adequacy of the ceilings, the spaces are required to achieve specific fire performance requirements commensurate with the buildings use and contemporary standards. As part of the development of solutions for the ceilings, fire testing and an assessment pathway was developed and undertaken to verify the performance and suitability of potential intumescent coatings which could be applied to restored ceilings to achieve the required fire performance requirements. The results of the completed fire tests showed varying levels of failure against the required FRLs for numerous heritage ceiling configurations. Following detailed fire testing, the required ceiling configurations established for the ceilings are: expanded metal lath & plaster ceilings for 60-minute and 90-minute FRL, and the timber lath & plaster ceilings for 90-minute FRL. This testing has confirmed that application of intumescent coatings to these ceilings (as previously proposed) is not a viable option.

5.1.2. Racetrack corridor – coke breeze & concrete arch ceilings

Following further reviews and as established during fire testing, the existing coke breeze & concrete arch ceilings within the abovementioned sections of the racetrack corridor do not meet the required 90-minute FRL. Intervention into these ceilings is therefore necessary in order for the building – which has suffered catastrophic fire damage in the past – to comply with the already reduced FRL which has been justified through a fire engineered performance solution endorsed by FRNSW, and for the building to remain safe into the future.

5.2. TIMELINE

The existing ceilings in the Lands Building have been subject to ongoing testing and discussion for some months now, including a series of discussions with relevant approval authorities and their representatives. A timeline of key events is outlined below:

- **July 2022:** Project team first engaged with PDU on the issue of the ceilings. The project team requested that PDU raise these identified concerns around the ceilings with relevant authorities and gain endorsement of an alternative proposal.
- **1 August 2022:** PDU informed Heritage NSW of the ceiling issues. HNSW recommended that the project team seek the advice of the Technical Advisory Panel.
- **10 August 2022:** Site inspection carried out with HNSW & City of Sydney heritage specialists, to inspect ceilings and better understand the issues.
- **26 August 2022:** Briefing meeting held with the Department of Planning, Industry & Environment.
- **31 August 2022:** Meeting with the TAP convened to discuss the issue.
- **9 September 2022:** Briefing meeting held with City of Sydney heritage specialists.
- **21 September 2022:** Formal advice received from TAP.
- **20 October 2022:** Out-of-session meeting held with TAP to further discuss ceilings (including provision of additional documentation as requested).
- **26 October 2022:** Briefing meeting held with CoS heritage specialists.

- **31 October 2022:** Formal advice received from TAP.
- **2 November 2022:** Meeting held with HNSW.
- **9 November 2022:** Site walk with CoS heritage specialists, representatives from HNSW, and representatives from DPIE.

5.3. OPTIONS ANALYSIS

Investigations have identified a number of complex issues (the extent and severity of which were not apparent prior to the completion of investigations, testing and design works completed recently), that render the previously proposed design solutions no longer suitable. Alternate solutions must therefore be considered and resolved to achieve adequate fire and structural compliance, while protecting the heritage significance and presentation of the place. It is acknowledged that the building has already suffered extensive fire damage in the mid-1980s to the Bent and Gresham Street roof spaces, making this aspect of the building's refurbishment all the more urgent.

The following section contains a brief summary of the alternate options developed and explored by the project team, and indicates the reasons why these options have been deemed unviable and discounted as a result of non-preferable heritage (or other) impacts.

5.3.1. Lath & plaster ceilings

Option 1: Retain & Restore – option discounted

Retaining and restoring the existing ceilings as per the original approval, while noted as the preferred heritage outcome, is no longer possible when considering the various structural and performance requirements for the building. The issues which render the preferable option of retaining and restoring these ceilings unviable can be summarised as follows:

- The ceilings have been generally found to be in very poor structural condition.
- The ceilings would require significant stabilisation and intervention in order to be made safe, in accordance with current best practice. While possible, the works would be undertaken without any guarantees of achieving a warrantable solution, compromising the insurability and therefore, ongoing use of the building.
- The works would necessitate the removal of hazardous material, including lead paint and the resultant damage to retained significant fabric from this process, the necessary stabilisation works and application of new fire-rated coatings would result in a substantial loss of fabric.
- The ceilings, with stabilisation and additional protection, will not achieve the required compliance with NCC requirements using a performance-based approach (e.g., performance solutions associated with fire engineering measures – noting that a 50% reduction in the required FRLs through a fire engineered performance solution endorsed by FRNSW) and structural performance criteria reductions for the project, again, compromising the insurability and ongoing use of the building.
- The limitations and application of applied coatings that achieve the necessary FRLs as detailed above, which still showed varying levels of failure against the required FRLs for numerous heritage ceiling configurations.
- The long-term durability and ongoing maintenance of the ceilings to ensure integrity with respect to fire, and public and user safety.

- Operational concerns regarding access to carry out inspections, and long-term maintenance requirements for the repaired and stabilised ceilings.
- Insurance considerations particularly linked to the future use of the heritage asset, i.e., publicly accessible retail, food & beverage, function, and co-working spaces for large numbers of public guests.

Having regard for the above considerations the option of retaining & restoring the existing ceilings was discounted, noting that this solution would not provide a safe or viable outcome for the client's operations within the adaptively reused building. It is also recognised that the failure of existing fabric to date, and its inability to perform under the required fire conditions will result in a lack of guarantee for the ongoing viability of the ceilings, a high likelihood of further degradation of the fabric resulting in additional intervention in the future.

Option 2: Retain, Restore & Encapsulate – option discounted

A second option considered was to retain & restore the existing ceilings, and to encapsulate them – including the existing cornices – with new linings which would meet the required FRLs.

In addition to the issues noted above this option was also discounted from a heritage perspective as it would generate an unacceptable heritage impact on the detailing and spatial volumes of the existing spaces. In particular, lowering the ceilings in these spaces would result in an obscured and diminished visual relationship between the exceptionally rare and significant Australian Cedar timber joinery and the intricately detailed ceilings. In many of these spaces the underside of the cornices comes close to touching the top of the joinery, however the two elements remain visually distinct. In our opinion, this visual relationship makes a vital and defining contribution to the significance of the building, and in all cases of encapsulation, the spatial volume of the rooms will be entirely and unreasonably obscured, significantly diminishing the character, presentation, and significance of these spaces as they are opened up for future public use.

Furthermore, this type of intervention would result in significant and irreversible damage to existing ceilings, due to the installation of hangers the new ceilings as well as necessary services penetrations.

As such, the option to retain, restore & encapsulate ceilings was discounted due to highly adverse visual and physical heritage impacts.

Option 3: Salvage all cornices, introduce new ceilings – option discounted

Having regard for the issues related to option 1 (retain & restore) and option 2 (retain, restore & encapsulate) as discussed above, a third option considered was to salvage all cornices, demolish the existing ceilings, reinstate new fire-rated ceilings, and reinstate the salvaged cornices.

However, this option was discounted as salvaging all the cornices could still result in the likely loss of cornice fabric (where beyond salvage), and may also necessitate the removal of original timber structural members if the moulded plasterwork and its secondary framing is not able to be removed from the primary structure. This option therefore may result in removal and replacement of fabric above and beyond that required to achieve the relevant structural and fire safety outcomes for the building (refer to methodologies prepared by TRC and Purcell for details).

On this basis, this option was discounted.

Option 4: Salvage sections of key cornices, reinstate salvaged elements with reconstructed ceilings & cornices – proposed solution

Having undertaken testing and analysis of all other options, the option which has been adopted for this proposed modification and for which approval is sought is that which is outlined in Section 4, above.

A discussion of the heritage impacts of this proposal is carried out in Section 6, below.

5.3.2. Coke breeze & concrete arch ceilings – racetrack corridor

After extensive investigations, no alternative solutions have been deemed suitable for the racetrack corridor. Similar to the issues outlined in Option 2 for the lath & plaster ceilings, encapsulation has been considered, however this solution would detrimentally alter the spatial qualities of the building, and would, therefore, have an adverse impact on the overall presentation and proportions of the space. The proposal to demolish and reconstruct, while resulting in a loss of fabric, will enable these key relationships to be respected and interpreted as the new ceilings will largely maintain the existing heights, visual appearance, details and profiles around the exceptionally significant timber joinery.

The exceptionally significant Lyon and Cottier tiled and painted Royal Coat of Arms will also require removal. No alternate solutions are possible for this element, and as such, it is proposed to carefully remove and reinstate the Coat of Arms, in accordance with a future methodology to be prepared by suitably qualified experts. It is noted that a large portion of the mural has been previously lost, with the grey sections of tile assessed as new replacements following restoration works carried out in the 1980s.

6. IMPACT ASSESSMENT

The works have been guided by relevant CMP policies, including “Principles for Proposed Change” as reproduced below:

6.7 PRINCIPLES FOR PROPOSED CHANGE

Policy 6.7.1

Generally, proposed changes that impact on heritage significance should only be considered if:

- *The change is considered necessary to maintain the asset in working order;*
- *They support the conservation and maintenance of elements of that make a defining contribution to the place’s heritage significance;*
- *They enable the removal of intrusive fabric, thereby re-capturing degraded aspects of significance;*
- *Care is taken to minimise adverse impacts on heritage significance;*
- *The change helps to maintain the security or safety of the heritage building, its significant elements and its users;*
- *There is no other alternative solution;*
- *New work is of design excellence and quality materials are used that are sympathetic to the significant fabric;*

- *The change supports a viable ongoing use;*
- *The change enables or increases public accessibility;*
- *The change enables increased interpretation; and*
- *Any change is reversible if it adversely affects elements that make a defining contribution to the place's heritage significance. Non-reversible change should not prevent future conservation action.*

6.1. LATH & PLASTER CEILINGS

As discussed above, the proposed solution has been subject to detailed testing and analysis, including an assessment of all other feasible options. The proposed solution to remove all lath & plaster ceilings and to either salvage and reinstate, or reconstruct, decorative cornices demonstrates, in our opinion, an appropriate balance of compliance and reasonable performance-based solutions in order to ultimately safeguard the conservation and ongoing use of this exceptionally significant heritage asset.

The existing lath & plaster ceilings have been found to be in generally poor condition by the project's remedial structural engineer, Northrop. This includes the failure of a high proportion of the plaster keys and the catastrophic failure of a number of ceilings to date. While the ceilings could undergo repair, such work would entail a high degree of intervention and, crucially, would mean that building insurances – and, by extension, future use – would be compromised. While the removal of original building fabric is ordinarily the least preferable outcome from a heritage perspective, in this instance it would constitute essential work which would enable the building to continue to be safely used and appreciated into the future, and as such is deemed supportable from a heritage perspective. It is noted that the removal of existing ceiling in the Minister's Room (G.07) will result in the loss of what survives of the original paint scheme for this space (noting the current scheme is a reconstruction). While the loss will result in some adverse impact on the space, this is mitigated by the extensive recording and documentation of the original finishes as part of this project, which will enable accurate reconstruction in the future, if required.

The proposed new ceilings will be fire-rated to achieve the required level of compliance for the building as justified through a fire engineered performance solution endorsed by FRNSW, and will enable its ongoing, safe use. The new ceilings will be finished with a suitable coating that provides a visual outcome consistent with the original set plaster finish, and will be set at levels as close as possible to existing in order to maintain the visual presentation of the rooms, including the relationship between the exceptionally significant original joinery and decorative plasterwork. In our opinion, the protection of the Australian Cedar joinery within the rooms – including both its presentation and its fabric in tandem with its overall visual imagery – is of paramount importance to the conservation of the building and thus, the proposal strikes an appropriate balance between the necessary performance and compliance upgrades, and heritage significance of the place.

With the building having been subject to fire damage in recent decades, it is evident that reasonable solutions need to be considered, and accepted, in order to ensure the building's long-term conservation and use. The proposal represents a balance between the ongoing conservation and maintenance of the place, and the compliance requirements for its future preservation, conservation, and use, and is therefore supported from a heritage perspective.

6.2. CORNICES

6.2.1. Cornice Salvage & Reinstatement

In the context of the works which are required to maintain the building's ongoing functionality, the proposed salvage & reinstatement (where possible) of original sections of the exceptionally significant and highly elaborate plaster cornices within original rooms which will be publicly accessible (G.01, G.04. & G.07) is considered an appropriate and positive heritage outcome. This will enable the retention and meaningful reuse of original building fabric which will provide evidence of traditional techniques & materials which were used in the building's construction.

The salvage of cornices in the Minister's Room (G.07) will also enable the evidence of the original decorative scheme to be retained on this element, noting that it has been extensively documented via paint scrapes as part of this project.

6.2.2. Cornice Moulding & Reconstruction

As discussed above, only selected sections of original cornice are proposed for salvage, as the safe removal of the cornices (where able to be salvaged) may also necessitate the removal of original timber structural members to which the moulded plasterwork is adhered. On this basis, the salvage of all cornices was deemed to generate unreasonable adverse impacts as it may entail the removal and replacement of original fabric over and above what would have been required in order to achieve the relevant structural and fire safety outcomes for the building.

The proposal to take mouldings and reconstruct the cornices, therefore, is an acceptable heritage outcome that balances the retention of original fabric with the conservation of the original presentation and character of these highly significant spaces, including detailing and proportions.

In rooms with high ceilings but less elaborate cornices (including rooms constructed during the 1894 extension to the building, as well as the entry vestibules), the cornices and ceiling beams will be reconstructed on a like-for-like basis based of moulds, retaining a greater proportion of the original timber structure. While this will result in the loss of fabric in rooms of Exceptional and High significance, it will be mitigated by the like-for-like reconstruction of the cornices retaining full legibility and appreciation of the original visual & spatial qualities of these rooms, including the visual relationship between the exceptionally rare and significant Australian Cedar timber joinery and the ceilings, that make a high contribution to the overall significance of the building.

In smaller, secondary rooms with lower ceilings and simpler cornice detailing, the proposal will reconstruct a new, representative cornice which is currently found in a majority of the spaces. While it is recognised that some of the existing cornices will not be reinstated, on the whole the proposal will facilitate an ongoing understanding of this defined hierarchy of individual spaces within the building and, as such, will constitute a reasonable heritage outcome when understood in tandem with the other issues which are being resolved as part of this suite of works.

In a small number of selected spaces (G.18, G.24 & 1.25), no cornice replacement is proposed to finish the new fire-rated lining. This solution is appropriate in these spaces as they are back of house spaces, which have generally been located within spaces of lesser relative significance that contain less sophisticated detailing, and will not be publicly accessible. On this basis, the solution for these spaces is acceptable from a heritage perspective.

6.3. RACETRACK CORRIDOR – COKE BREEZE & CONCRETE ARCH CEILINGS

As detailed above, sections of the existing vaulted concrete ceiling to the racetrack corridor do not meet with the required 90-minute FRLs. Noting the requirements for the building to remain safe and useable for future occupants, demolition and replacement of the ceiling structure is a necessary outcome. To mitigate the adverse impacts associated with these necessary works, the proposed replacement ceiling will be constructed to match the existing original in terms of form and profiles, and as such will be a sympathetic, faithful recreation which will enable the ongoing legibility of the exceptionally significant racetrack corridors.

It is also recognised that the works will result in the removal of the exceptionally significant Lyon and Cottier painted and tiled Coat of Arms, which is found within the Bridge Street entrance vestibule resulting in a potentially adverse, yet necessary impact on the place. To mitigate this impact, the proposal will undertake careful removal and reinstatement of the Coat of Arms as part of these ceiling works. This should be carried out in accordance with a detailed methodology, to be prepared by a recognised and suitably experienced professional in materials conservation.

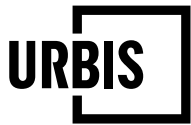
7. CONCLUSION

The works proposed as part of this modification constitute necessary interventions which will enable the building to remain safe and useable as it enters the next phase of its functional life. While the proposed works would entail the removal and replacement of a high degree of original building fabric, these works, and alternate options, have been carefully considered in close consultation with Urbis, as the project heritage consultants, and in our opinion constitute the most feasible outcome in the context of the building's future conservation, maintenance, and use.

The works which are proposed under this modification have been designed with due consideration for the history and significance of the building in tandem with relevant compliance matters. The proposed works will enable ongoing legibility of the exceptionally significant character of the Lands Building, including the majority of its internal fabric, while ensuring it remains safe and functional long into the future.

To this end, the proposed works will:

- Enable the asset to be maintained in working order while setting it up for the next functional phase of its existence
- Support the conservation and maintenance of other elements that make a defining contribution to the place's heritage significance (including the highly ornate moulded cornices to be reinstated and the exceptionally rare & significant Australian Cedar joinery)
- Enable the removal of fabric which is in very poor condition or a state beyond reasonable repair
- Maintain the safety of the heritage building, its significant elements, and its future users
- Constitute a solution which has been resolved as a result of testing all other alternative options
- Result in a finish which is sympathetic to original fabric (with a suitable coating that will be consistent with the visual appearance of the original set plaster finish)
- Support the viable ongoing use of the building
- Enable and increase public accessibility to the building through adaptive reuse



- Best enable retained legibility & interpretation of the original spatial volumes & visual qualities of the internal rooms
- Facilitate the viable ongoing use & conservation of the building

Accordingly – and having regard for the other options as discussed above – the proposed modification is recommended for approval from a heritage perspective.

Yours faithfully,

A handwritten signature in black ink that reads "Renee Riley". The signature is fluid and cursive, with a small dot at the end.

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