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7 March 2023

Anthony Witherdin
Director, Key Sites Assessments
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Anthony,

HERITAGE RESPONSE TO RFI | DEPARTMENT OF LANDS BUILDING, 23-33 BRIDGE STREET, SYDNEY (SSD 7484 – MOD 18)

1. BACKGROUND & PURPOSE

This response has been provided by Urbis, in our capacity as the nominated heritage consultant for SSD 7484, to provide additional information as requested by Heritage NSW and the City of Sydney (via the Department of Planning and Environment) regarding MOD18 of the SSD.

2. AUTHORSHIP

This report has been prepared by Jonathan Bryant, Partner and Co-lead National Director of Urbis. I hold Honours degrees in Architecture and a Masters Degree in Heritage Conservation from the University of Sydney. I have had had over 20 years of professional practice in the design and construction industry in Australia with a focus on adaptive reuse of heritage buildings. I am a full International Member of ICOMOS, a member and former committee member of the Twentieth Century Heritage Society of NSW, and of both the National Trust and Docomomo Australia. I am a member of the Government House Sydney Crown Land Advisory Panel and I sit on the Contemporary Collection Benefactor's Committee of the Foundation of the Art Gallery of NSW. I was also a member of the Professional Advisory Committee for the Graduate Heritage Conservation Program at the University of Sydney.

I have been responsible for a number of major building conservation and adaptive reuse projects, including the refurbishment of Sydney's iconic State listed Queen Victoria Building (awarded a 2010 New South Wales Chapter of the Australian Institute of Architects Commendation for Heritage Architecture), conservation and adaptive reuse of a major historic State listed former banking chamber in Martin Place for Burberry's Sydney Flagship Store (featured in the NSW Heritage Council publication "Heritage Listing Explained: What it means for you"). I have also played a key role in the unique transformation of the upper levels of the State listed State Theatre Building and the Gowings Building into the QT Hotel in central Sydney. This landmark hotel project demonstrates the successful meeting of best heritage practice, architecture and contemporary interior design. This project won the 2013 the New South Wales Chapter of the Australian Institute of Architect's Francis Greenway Award for Heritage Architecture Creative Adaptation. The Greenway Medal is the Institute's highest award for heritage conservation. I have also also been recently involved with the conservation and adaptive

reuse of the State listed former Sydney Water Head Office which has become the five-star Kimpton Margot Hotel. This project was awarded a 2016 New South Wales Chapter of the Australian Institute of Architects Commendation for Heritage Architecture Creative Adaptation.

In my previous position at GBA Heritage, I was the co-author (along with historian Dr Martina Muller) of the endorsed Conservation Management Plans for both the Lands and Education Buildings. I was also the author of the Stage 2 GBA Heritage Statement of Heritage Impact (a component of the EIS for SSD 7484) dated October 2016 for the adaptive reuse of the Lands and Education Buildings. In my role as Director at Urbis, I have continued to provide on-going heritage advice and continuity to the project team.

3. DEPARTMENT OF PLANNING AND ENVIRONMENT SUBMISSION (REF: SANDSTONE PRECINCT – LANDS BUILDING CEILINGS (SSD-7484-MOD18), 10 FEBRUARY 2023

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1.0	*Provide a comprehensive response, including additional information and evidence, which addresses the detailed analysis provided in Attachment 2 of Heritage NSW advice dated 7 February 2023.*	See below.
1.1	*Significance of the ceilings*	Detailed investigations were carried out by the project's remedial structural engineer, Northrop, to determine the condition of the existing ceilings. The outcomes of these investigations have identified systemic defects including shearing of plaster keys, corrosion issues, and the cracking and deterioration of sections of the lath and plaster ceilings. In response to these investigations, temporary and permanent ceiling stabilisation details have been developed. However, as absolute guarantees cannot be provided that a ceiling failure will not occur, no solution is available which provides an acceptable structural outcome for operation of the development upon its completion. Additionally, a detailed assessment by Warrington Fire (as the specialist fire assessor) of the previously proposed fire-rating solutions – namely, intumescent paint application – have been completed. This assessment process included the undertaking

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		of fire testing to both representative ceiling specimens and ceiling specimens which had been extracted from the Lands Building. The outcomes have determined that large extents of the ceilings do not meet the requisite FRLs and, for some ceiling types, no FRL could be provided (such as for the expanded metal mesh ceilings). In response to the outcomes and advice of the fire assessment process, the fire engineer, Stantec, has confirmed that the performance requirements detailed in the FEBQ are not achieved due to the shortfalls in the fire protection measures. In considering both the failures and shortfalls in the structural and fire performance of the design as detailed in the approved development consent, it is therefore acknowledged that intervention into the ceilings is required in order to make the building fit for reasonable and functional purpose. The proposed intervention is as detailed in the MOD18 submission. 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 at the Lands Building which is largely in keeping with the gradings of significance for individual spaces as outlined in the endorsed GBA CMP, and which also reflects the proposed use and public accessibility of the spaces. To this end, a 3-tiered approach to ceiling works is proposed (as outlined in the Heritage Impact Statement prepared for the Modification application) which, in our opinion, appropriately and reasonably responds to the relative contributory value of the ceilings per the endorsed CMP as well as to the necessary structural and fire requirements which will enable the building to remain in use.
1.2	*CMP policies for ceilings*	It is recognised that the endorsed CMP included policies regarding the conservation and protection of ceilings within the Lands Building. We also refer to policy 16.7.3, which is reproduced below:

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		Future adaptations and upgrades of the Lands Building must aim to meet the requirements of the National Construction Code, particularly in regard to protection against fire. Where there is a conflict between the National Construction Code and the heritage significance of the building, alternative options to achieve compliance should be investigated, including performance fire engineered solutions. However if it can be demonstrated that the alteration is absolutely essential then such alteration must be made in accordance with the policies in this Conservation Management Plan. Having regard for structural and fire requirements, we confirm that alternate options have been investigated, as discussed in the HIS prepared as part of the Modification application. These alternate options were all found, for various reasons, to have highly adverse impacts on the presentation, character, and, therefore, overall significance of the Lands Building. These adverse impacts resulting from alternate options include loss of original fabric, lack of ability to meet requisite code requirements (with particular reference to FRLs), as well as the inability to retain the presentation of the spaces within the building. We are therefore of the opinion that the proposed 3-tiered solution for these necessary works to the ceilings is the most appropriate approach which best balances the significance of the Lands Building with code compliance, in accordance with policy 16.7.3 of the endorsed CMP.
1.3	*Assessment of lath and plaster ceiling condition*	Investigations by Northrop to the accessible areas have identified defects throughout the ceilings, including that the keys are variously compromised. We note that the increased quantum of ceilings deemed in 'poor' or 'very poor' condition is likely due to the ability of the remedial structural engineer to access both the underside of ceiling at close range and the rear side of the ceiling (following the removal of flooring and clearance of the sub-floor/ceiling cavity), much of which had been previously concealed. Additionally, representative material testing of the ceilings to inform the design has been completed. Indeed, it is a positive that the true condition of the

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		ceilings has now been brought to light following these detailed investigations and testing. Accordingly, it is our view that the proposed interventions to the ceilings as proposed by this Modification are supportable from a heritage perspective, noting that the ultimate objective of these works is to balance the recognised heritage significance of the Lands Building (including the character and presentation of individual rooms within the building) with the necessary improvements to ensure the building can remain in use well into the future.
1.4	*Previous works to ceilings and heritage approvals*	Previous works undertaken to the lath and plaster ceilings predate possession of the Lands Building by the proponent and the engagement of Urbis. Additionally, Urbis is not aware of any endorsement for works issued on 28.08.2018, and additional information is requested from HNSW on this matter.
1.5	*Ceiling stabilisation*	While some sections of timber and expanded metal mesh lath & plaster ceilings have catastrophically failed in the past, Northrop's assessment is that the plaster keys are variously compromised, and that the achievement of structural adequacy for the existing ceilings will require various strategies to be implemented. The Proponent has also advised that even if these strategies could be successfully carried out and the existing ceilings retained and restored, and in response to the advice by Northop that an absolute guarantee cannot be provided against a failure or collapse of the retained heritage ceilings, the residual risk is not acceptable. In addition, the limitations associated with monitoring inspections and other such measures would be prohibitive and would result in significant negative impact on the building's insurability and eventual occupation and use. Therefore, having regard for the expert structural and fire engineering advice provided to date by Northrop, Warrington Fire, and Stantec, we note that the options of conservation (stabilisation and repair) and like-for-like reinstatement of the ceilings (with respect to new lath and plaster) do not practically

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		resolve these other critical issues which require resolution for the safe future occupation and use of the Lands Building.
1.7	*Lyon and Cottier Coat of Arms*	Urbis endorses the careful removal, safe storage, and future reinstatement of the Lyon and Cottier coat of arms. A detailed methodology will be prepared by a specialist contractor and will be reviewed by relevant experts within the project team prior to its endorsement. It is considered that retaining this exceptionally significant element in situ while carrying out necessary fire-rating interventions to the substrate would cause a significant risk of damage to this element (which, we note, was extensively restored in the 1980s). This will enable future exposure of this element, which is a highly positive heritage outcome.
5.0	*Where retention and restoration of ceilings and cornices is not possible, consider further mitigation and interpretation measures which could include:*	See below.
5.1a	*retention, restoration and conservation of sample rooms, as recommended by Council, to demonstrate the original ceiling construction details*	Retention of representative ceilings and cornices has been considered by the project team. There are several issues which would arise as result of this, namely: ▪ Expanded metal lath & plaster ceilings are unable to achieve a fire rating (as the testing and assessment identified no rating (zero minutes)) or meet structural requirements. Retention of existing expanded metal lath & plaster ceilings would therefore necessitate the installation of a new fire-rated ceiling lining to satisfy the requirements of the FEBQ. This fire rating lining must extend to the existing walls and would encapsulate retained ceilings and cornices. The support hangers for any new lining would need to be fixed through the retained lath & plaster, which would generate highly adverse material impacts. There would also be a requirement to provide fire rating to any retained cornices – likely a bulkhead which would also need to be fixed into the retained fabric (with potential knock-on effects where a bulkhead may interface with the

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		exceptionally significant timber joinery), thereby further concealing any original fabric from view. This, in our opinion, would generate unacceptable impacts with respect to both fabric conservation and the maintained character and presentation of the spaces within the building. ▪ Timber lath & plaster ceilings do not meet the 90-minute FRL or necessary structural requirements. As has been documented elsewhere – and recognised by the TAP – the ceilings are currently in generally poor or very poor condition. This expert opinion has been formed by the project's remedial structural engineer, Northrop following detailed investigations from above the ceilings, which has found that all keys are variously compromised. Any retained ceiling would therefore require the introduction of new structural strengthening elements which would most likely generate irreversible material impacts on the retained original fabric and would therefore not be a positive heritage outcome. Having regard for the issues which would result from retaining representative examples of the ceilings, it is instead proposed that representative samples of each ceiling type (expanded metal mesh, and timber lath and plaster) be carefully salvaged and incorporated into the future heritage interpretation display for the building, in conjunction with Freeman Ryan Design. We note that this solution has already been approved for the salvaged roof trusses. To this end, the heritage interpretation for the building can provide a unique opportunity for the public (including tour groups) to learn about traditional construction techniques, which we believe to be a highly positive outcome from a heritage and broader public engagement perspective. Additionally, the ceilings and cornices have now been documented by project architects Hassell and project heritage architects Purcell. A detailed Archival Recording showing the building's condition prior to the commencement of the current adaptive reuse works was also prepared in 2017, which show internal elevations of all rooms including ceilings and cornices.
5.2b	*commitment to match the finish, colour*	Urbis has provided ongoing advice to the project team regarding the importance of retaining the original presentation

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	scheme and height of any new ceilings with the original ceilings	and proportion of rooms within the building, including the important relationship between ceilings, cornices, and joinery. New fire-rated ceiling linings will be set as high as possible to match the existing proportions of the rooms but, by necessity (due to their material properties), will have a deeper build-up than the existing plaster linings. This is considered an acceptable heritage outcome as it will allow for the retained presentation of the rooms and their hierarchy of elements. The project team, in conjunction with Urbis, will continue to explore options to maintain the appearance of the set plaster finish to the ceiling linings, however this will require consideration of the fire-rating consequences of any new finish. We also note that while contemporary colour schemes are proposed in a number of spaces, there are also spaces identified where interpretations of historic colour schemes is proposed. Urbis considers this to be an acceptable outcome from a heritage perspective. Contemporary, sympathetic colour schemes will not adversely alter the character or significance of the building and are completely reversible. The installation of contemporary, sympathetic colour schemes in historic places is a recognised way of effectively but reversibly update the appearance of a building to suit a new or ongoing use. Additionally, interpretations of historic paint schemes will enable ongoing legibility of the building's original detailing. For the key rooms with the salvaged cornices (G.01, G.04, G.06 & G.07), Urbis understands that the Proponent is committed to a process to select colours in consultation with CoS and HNSW.
5.3c	*commitment to match the design, material and finish of all replicated cornices as the existing cornices.*	All new cornices will match or interpret existing original cornices with respect to design and finish. New cornices will, however, be manufactured using contemporary materials and techniques. We note that contemporary techniques were used by the Traditional Restoration Company to replicate cornices at the neighbouring Department of Education building, to highly satisfactory results, and these techniques are typically utilised in conservation works.

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6.1	*Provide expert heritage advice on the feasibility of salvaging and reinstating cornices, based on the investigation of the existing fabric and experience in previous conservation projects.*	Wet run cornices, which are found in secondary rooms, are unable to be salvaged and reinstated owing to the material properties of these elements. In our experience, salvaging and reinstating moulded cornices is an achievable exercise. However, due to the heavy and fragile nature of this fabric, there is a risk of plaster breakage between lath sections. A program of salvage and reinstatement would also result in increased joints between the reinstated sections of the cornices, which could adversely impact their installation and future presentation. It is additionally acknowledged that the current construction environment makes such an undertaking practically unviable, due to the scarcity of suitably qualified tradespeople and the resultant cost impacts to the project (on top of material costs, which themselves are significantly higher at present than at the beginning of the development).
7.1	*Justify the proposed reconstruction of cornices in secondary rooms with 'typical' cornice profiles, rather than exact profiles.*	An investigation of all existing cornice types which are the subject of MOD18 has found that there are currently 22 individual cornice types in the building, including 15 types in the secondary rooms.[1] The following considerations were made during the rationalisation design: ▪ Several of the 15 cornice types within the secondary rooms were found to be highly similar in appearance and detailing, especially when viewed from below within the rooms with only extremely minor differences. ▪ While there are only a small number of examples of each cornice type within the secondary rooms (generally 1 or 2 of each type, with 1 type occurring in 3 locations), there is also a typical cornice type which occurs in 16 locations within the secondary rooms across ground-floor level and level 1.

[1] Secondary rooms are defined as those rooms assessed as being of High or Little contributory value in the endorsed 2017 Conservation Management Plan. Principal rooms are assessed as being of Exceptional contributory value, being the corner offices and the entry vestibules.

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		On this basis, it is therefore proposed to rationalise these 15 secondary room cornice types to 12 cornice types, with 1 type not being reinstated (as the space in which it occurs will be a future back-of-house area). We also note that all cornice types have been inspected, measured, and have now been documented by Purcell for future archival documentation purposes. It is important to recognise that the hierarchy of individual spaces within the building which will continue to remain readily legible and understandable as a result of the proposed cornice rationalisation within these secondary rooms. The simpler cornices within these secondary spaces will continue to provide a meaningful counterpoint to the more ornate cornices which will be part salvaged and carefully reconstructed in the principal rooms of Exceptional contributory value. The proposed solution respects and responds to the presentation, character, and significance of the Lands Building and therefore, in our opinion, constitutes an acceptable heritage outcome.
8.1	*Explore and document options to retain the vault containing the Lyon and Cottier Coat of Arms in-situ.*	Refer to discussion at point 1.7, above.

4. CITY OF SYDNEY SUBMISSION (REF: R/2014/39/AD, SANDSTONE PRECINCT MODIFICATION 18 – LANDS BUILDING CEILINGS)

Ref.	Matter raised	Response
Demolition of existing lath & plaster ceiling and replacement of fire rated plasterboards		
10.1	*Given the condition of the existing ceilings and the test failures in their fire rating capacities, the City have no objection on the proposed replacement. However, the finish, colour scheme and the height of the new ceilings must match the original*	Refer to discussion at point 5.1a, above.

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	ceiling. The construction details of the of both lath and plaster ceilings, and mesh and plaster ceilings are to be properly documented.	
10.1	*In addition, two sample rooms, one containing intact timber lath & plaster ceiling and the other containing metal mesh lath & plaster ceiling should be retained to demonstrate the original ceiling construction details.*	Refer to discussion at 5.1.a, above.
Demolition and reinstatement of wall and beam cornices		
10.2	*Though in principle the City support the proposed salvage, replica and reinstatement scheme, we recommend more cornices may be salvaged and reinstated where possible. The option of retaining the wall cornices in-situ should be tested by a professional contractor. Retention of more existing cornices has both heritage and economical benefits.*	Removal and reinstatement of the cornices has been considered as part of ongoing design development. This was, however, considered unfeasible due to FRL requirements (namely, a new fire-rated barrier is required at the junction of the new fire-rated ceiling and the brick wall, with a resultant effect of having to fully seal this barrier and thus affecting the ability of the cornice to be adequately reinstated). In addition, the new fire-rated ceiling build-up will be deeper than the existing plaster and, as such, the cornices are required to be removed to accommodate the required works to the ceilings.
Demolition and replacement of breeze arches		
10.3	*The corridor ceiling contains a painted and tiled Coat of Arms which is of exceptional significance. Its removal and reinstatement is considered to have major adverse heritage impact. Options to retain it in-situ are not discussed in the application. Given its significance, the portion of vault containing the artwork should be retained in-situ*	Refer to discussion at 7.1, above.

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	and a fire insulation treatment may be applied in the ceiling space.	
General commentary		
10.4	*Given the complexity of issues in relation to varied conditions of the ceilings, building compliance requirements and heritage significance, it may be more appropriate to allow for flexibility in adopting different options instead of a one-fit-all solution.*	As part of the design development phase of the alternate ceilings, various options were investigated. These options were reviewed against the criteria of Heritage & Architecture, Technical Compliance and Operational Considerations. Each option was given a risk rating. The option which yielded the only appropriate risk across all criteria was the full replacement of ceilings, which forms the basis of this proposal. To provide flexibility in this solution would compromise fire safety and / or stability of the ceilings and, therefore, this solution needs to be applied throughout the building.
10.5	*While overall the City consider this modification application is largely acceptable, we also recommend other options that have been previously discussed should be selectively adopted to some specific elements and rooms. This includes to retain some original ceilings and to retain the significant artwork at the ceilings.*	Refer to discussion at points 5.1a, 5.2b & 5.3c, above
Recommended conditions of consent		
10.6	*A full documentation of existing ceilings to be demolished or modified, including a 3D point cloud survey and archival photograph recording of each room and ceiling details, is to be carried out prior to commencement of any demolition work.*	The ceilings and cornices have now been documented by project architects Hassell and project heritage architects Purcell. A detailed Archival Recording showing the building's condition prior to the commencement of the current adaptive reuse works was also prepared in 2017, which show internal elevations of all rooms including ceilings and cornices.

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		Urbis also understands that, as part of the RTS response, a point cloud survey of the ceilings and cornices will be undertaken.
	Two sample rooms, one containing intact timber lath & plaster ceiling and the other containing metal mesh lath & plaster ceiling (e.g. G07 which contains original painting scheme), including their cornices, should be retained to demonstrate the original construction details.	Refer to discussion at point 1.2, above.
	All new ceilings are to be finished with a coating and finish that is consistent with the original set plaster finish.	Refer to discussion at point 1.1, above.
	Further tests of salvaging more cornices (than the proposed) and options to retain the wall cornices in-situ are to be explored.	Refer to discussion at point 2.1, above.
	The replicated cornices are to use the same material and finish as the existing. The samples/prototypes of all types of new cornices are to be reviewed by Heritage NSW and City of Sydney prior to their manufacturing.	All new cornices will match or interpret existing original cornices with respect to design and finish. New cornices will, however, be manufactured using contemporary materials and techniques due to fire rating requirements. We note that contemporary techniques were used by the Traditional Restoration Company to replicate cornices at the neighbouring Department of Education building, to highly satisfactory results.
	The vault containing the significant Lyon and Cottier painted tiled Coat of Arms is to be retained to preserve the artwork. A fire insulation option that enables its retention is to be adopted.	Refer to discussion at point 3.1, above.

5. HERITAGE NSW SUBMISSION (REF: HMS ID 2221, SANDSTONE PRECINCT MOD 18 – LANDS BUILDING CEILINGS (SSD-7484-MOD-18) – LANDS BUILDING CEILINGS, 7 FEBRUARY 2023)

Ref.	Matter raised	Response
1. Summary		
1.1	*The ceilings proposed for removal in Modification 18 are of high and exceptional significance. The policies in the Conservation Management Plan state that the lath and plaster and decorative plasterwork throughout the Lands Building are of exceptional and high significance and should be retained in situ, repaired, and conserved.*	Refer to discussion at point 1.2, above.
1.2	*The implementation of the methodology for conservation of the ceilings and cornices as outlined in the Northrop report, Preliminary Report on Permanent Stabilisation Detail of Timber and Metal Lath Ceilings (16 August 2022), is supported. According to Northrop's assessment, the proposed method of conservation will have a low risk of major ceiling failure/collapse.*	Refer to discussion at point 1.1, above.
1.3	*Westox has been used in other buildings for conservation of ceilings in NSW. These public and privately owned buildings remain open to the public and for commercial use including the Australian Museum and the GPO Building.*	Refer to discussion at point 1.1, above.
1.4	*The Department of Planning Environment should give consideration to the cumulative impact of incremental loss of original fabric over time that is having a direct, permanent and adverse impact on the intactness and*	Refer to discussion at point 1.1, above.

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	authenticity of the interior of the Lands Building.	
2. Comments – Ceilings, cornices and decorative plasterwork		
2.1	*Given that the proposed demolition and replacement of ceilings and cornices on the lower ground, ground and level one of the Lands Department Building will have a direct, permanent and adverse impact on the heritage values, the Department of Planning and Environment (DPE) should give consideration to:* ▪ *engaging independent reviewers to peer review the proposed fire strategy and structural engineering approach as part of the assessment of Modification 18* ▪ *whether DPE is satisfied those alternatives to the use of Westox and a performance-based fire safety strategy have been considered and assessed, as the removal of significant heritage fabric should be a last resort.*	As discussed at length in this response and in the HIS prepared as part of the Modification, a number of alternate options were rigorously tested prior to arriving at the solution currently proposed. The alternate options were discounted on heritage grounds owing to the overall negative impacts which would be incurred on the character, presentation, and significance of the Lands Building. In our opinion – and having regard for the compliance requirements for the building – we consider the proposed solution to be the most feasible from a heritage perspective as it would facilitate an ongoing legibility of the internal spaces of the building as it enters the next phase of its functional existence.
2.2	*The Preliminary Report on Permanent Stabilisation Detail of Timber and Metal Lath Ceilings (16 August 2022) details the conservation methodology options for the stabilisation of the lath and plaster ceilings. Timber block attachment and adhesive (Option B) is the option preferred by the consultants (Northrop). This conservation methodology conserves the lath and plaster ceilings and the concrete arch ceilings by allowing those original ceilings that can be retained and treated*	Refer to discussion at point 1.1, above.

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	to meet fire safety requirements are retained in situ.	
2.3	*This methodology also allows the removal of those ceiling components where they are beyond structural recovery or they do not meet the agreed fire requirements. Northrop believe that if Option B is applied, the risk of major failure/collapse is low. This would be an acceptable approach after consideration is given to a peer review of the proposed fire strategy and structural engineering approach and alternatives to the use of Westox and a performance-based fire safety strategy.*	Refer to discussion at point 1.1, above.
2.4	*Northrop have also recommended that where lath and plaster ceilings have collapsed this portion of the ceiling should be removed and the lath and plaster ceiling reconstructed. This is an acceptable approach and consideration should be given to:* ▪ *The condition of all ceilings must be assessed in order to determine the appropriate stabilisation approach. It is noted that ~34% have not been allocated a condition rating.* ▪ *Where original ceilings and cornices are designated for total or part replacement, the replication of those elements must meet exactly the scale, form and detail of the original ceilings and ornamental cornices.* ▪ *Any removed fabric must be archivally recorded prior to removal to the requirements of Heritage Council guidance. Elements of removed detail should be*	Refer to discussion at point 1.1, above.

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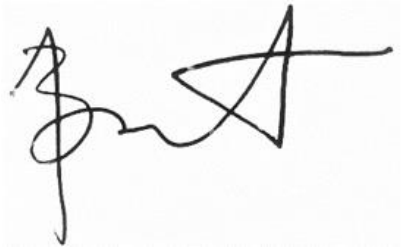
	considered for public display in the building as a record of the technology used in the building's craftsmanship.	
3. Comments – Lyon and Cottier Coat of Arms		
3.1	*The proposal to temporarily remove the Lyon and Cottier Coat of Arms is appropriate. However, it is recommended that the Coat of Arms be carefully removed and stored in its entirety including the more recent restoration works that reinstated lost tiles.*	Refer to discussion at point 1.7, above.

6. CONCLUSION

The proposed solutions are the result of thorough investigations into the conditions of the ceilings and consideration of all options. Retention of the ceilings will require encapsulation which will have an unacceptable heritage impact. In our expert opinion, the protection of the significant Australian Cedar joinery within the rooms – including both its presentation and its fabric in tandem with the rooms' overall visual imagery and proportion – is of paramount importance to the conservation of the building and needs to be prioritised. Accordingly, the ceiling proposal is both reasonable and appropriate from a heritage perspective.

We trust this submission provides you with the information you require in order to make a determination. We look forward to continuing to work constructively with the Department, Heritage NSW, and the City of Sydney on this important project. If you require any clarification, please do not hesitate to contact me.

Yours faithfully,



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