

8 March 2023

Michael Cassel
Planning Secretary
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Attention: Annika Hather, Planning Officer, Key Sites Assessment

Dear Annika,

SANDSTONE PRECINCT SSD7484 MODIFICATION 18: RESPONSE TO REQUEST FOR FURTHER INFORMATION AND RESPONSE TO SUBMISSIONS

This letter is submitted to the Department of Planning and Environment (DPE) in response to a Request for a Response to Submissions (RTS) issued on 9 February 2023 and a Request for Further Information (RFI) issued on 10 February 2023 for the current 4.55(2) modification application for State Significant Development 7484 (SSD 7484) relating to adaptive reuse of the Sandstone Precinct (Education and Lands buildings) for tourist and visitor accommodation.

Modification 18 relates to proposed replacement of ceilings within the Lands Building.

The modification was placed on public exhibition from 19 January 2023 until 1 February 2023, and was referred to public agencies, with the following providing responses:

- Heritage NSW (Delegate of Heritage Council of NSW);
- City of Sydney;
- Department of Planning and Environment (Heritage NSW) on Aboriginal Heritage; and
- Transport for NSW.

The DPE have also provided comment, requesting a formal RFI response be prepared to address matters raised in the above submissions.

It is worth acknowledging the considerable efforts and genuine engagement and consultation undertaken by Pontiac Land Group and its project team as part of progressing and resolving what is a very challenging and complex issue that requires a full appreciation of all the issues in order to be able to reach an on balanced position to support the proposed application.

Responses to each of the submissions is provided in the following documentation prepared by the technical experts leading the project:

- Responses to RFI commentary by agencies prepared by project team (**Attachment A**)
- Fire Engineering Brief Questionnaire (**Attachment B**)
- Heritage Response to RFI prepared by Urbis, dated 7 March 2023 (**Attachment C**)
- Heritage Impact Statement prepared by Urbis, dated 14 December 2022 (**Attachment D**)
- Fire Engineering Response to Submissions prepared by Stantec dated 7 March 2023 (**Attachment E**)
- Fire Engineering Process Letter prepared by Stantec dated 7 March 2023 (**Attachment F**)
- Coat of Arms Fire Engineering Response Letter prepared by Stantec dated 7 March 2023 (**Attachment G**)
- Heritage Engineering Letter on Lath and Plaster Ceilings prepared by Northrop dated 1 March 2023 (**Attachment H**)

- Trial Salvage Report prepared by Traditional Stonemasonry Consulting dated 1 March 2023 (**Attachment I**)
- Fire Cap Coatings letter prepared by WarringtonFire dated 1 March 2023 (**Attachment J**)
- Fire Testing Explanatory Letter prepared by WarringtonFire dated 1 March 2023 (**Attachment K**)
- Fire Assessment of Fire Rated Ceilings and Cornices Letter prepared by WarringtonFire dated 2 March 2023 (**Attachment L**)
- FRNSW Discussions Letter prepared by WarringtonFire dated 28 February 2023 (**Attachment M**)
- Ad-hoc ceiling system test report prepared by WarringtonFire dated 29 November 2022 (**Attachment N**)
- Architectural Response Letter prepared by Hassell dated 7 March 2023 (**Attachment O**)
- Existing Lath and Plaster Review prepared by Hassell dated 7 March 2023 (**Attachment P**)
- BCA Statement prepared by Philip Chun dated 7 March 2023 (**Attachment Q**)
- Maintenance Works Letter prepared by Built dated 7 March 2023 (**Attachment R**)

1.0 Proposed Modification 18

Modification 18 as lodged proposes works to replace ceilings and cornices within the Lands Building that have been identified as unstable, and that also do not satisfy fire safety requirements. The works are briefly summarised below.

1.1 Demolition of existing lath and plaster ceilings

Demolition of existing lath and plaster ceilings to Lower Ground, Ground and Level 1, due to large state of failure and collapse.

1.2 New works

New fire rated ceiling linings to Lower Ground, Ground and Level 1 to areas identified below.

New fire rating ceilings are to be finished to provide a visual outcome consistent with the original set plaster finish.

All rooms, excluding G.18, G.24 and 1.25 are to include either salvaged cornices (3 rooms) or reconstructed cornices.

1.2.1 Cornice salvage, reinstatement and reconstruction

The hierarchy of rooms has been considered in terms of the relative contribution the spaces make to the overall significance of the Lands Building, identifying a clear three-tier hierarchy. This is largely in keeping with the gradings of significance within the CMP. The rooms have been allocated a “tier” by Urbis as follows (see Attachment D), inclusive of the proposed works:

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.*
 - a. *Non-salvageable cornice sections to be reconstructed to match as per the methodology.*

- b. *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.*
 - a. *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.*
 - a. *Reconstruction of typical cornice profiles as per methodology and following construction of new fire rated plasterboard ceiling.*

This tiered approach is considered the most suitable response when considering the need to balance the heritage values of the building and the critical fire safety and ceiling stability issues.

1.3 Racetrack corridor

Sections of the racetrack corridor require removal of the existing coke breeze and concrete arch ceiling to achieve the required 90-minute fire resistance level (90 FRL):

- Lower Ground Floor: northern corridor, western corridor, part of the eastern corridor, southern corridor groins
- Ground floor: southern corridor groins

These areas will have new arched ceilings constructed to largely maintain existing original form and profiles.

The Lyon and Cottier titled and painted Royal Coat of Arms within the Bridge Street entrance lobby is to be salvaged and reinstated once works are completed.

2.0 Analysis of Submissions

As above, there were four submissions received from public agencies, with information also requested by DPE:

- Heritage NSW (Delegate of Heritage Council of NSW);
 - Refer to **Attachment A** and accompanying technical documentation.
- City of Sydney;
 - Refer to **Attachment A** and accompanying technical documentation.
- Department of Planning and Environment (Heritage NSW) on Aboriginal Heritage; and
 - No further comment in relation to Aboriginal Cultural Heritage is required due to no ground disturbance.
- Transport for NSW.
 - No further comment was provided due to the works not impacting on the surrounding transport network.

As such, responses are required to the Heritage NSW, City of Sydney and DPE submissions.

3.0 Actions taken since Exhibition

Since the exhibition of the modification application, the proponent has been carrying out further detailed design work and discussion in response to the submissions made, including developing appropriate mitigation measures in order to minimise impacts.

These mitigation measures include:

- Detailed documentation of existing ceilings, including archival photography recording, and 3D point cloud survey.
- Salvage and reinstatement of ceilings in three rooms of high and exceptional significance.
- Salvage of representative samples of each ceiling type that can be incorporated into the future heritage interpretation display for the building, providing a unique opportunity for the public (including tour groups) to learn about heritage construction techniques and support a highly positive outcome from a heritage and broader public engagement perspective.
- Replication of cornices using profiles and types that match existing or are rationalised to generally match existing.
- Adopting contemporary construction methodologies and techniques for replica cornices that will support a like for like finish between existing and new (i.e. maintaining a set plaster finish).
- Constructing new ceilings and cornices to generally match existing in terms of height, colour and profile.
- Carefully removing, storing and reinstating the Lyon and Cottier Coat.

4.0 Response to Submissions

Detailed responses to each of the matters raised by DPE, Heritage NSW and the City of Sydney have been provided by the specialist consultants of the project team, and are available at **Attachment A** and within the accompanying technical documentation prepared by the expert consult team engaged on the project.

5.0 Amendments to the proposal

The proposed modifications, as proposed in Modification 18 above, necessitate amendments to the consent conditions which are identified below. Conditions proposed to be amended are indented, words proposed to be deleted are shown in ~~**bold strike through**~~ and words to be inserted are shown in ***bold italics***.

It is noted that Condition A3 – Terms of Consent does not require amendment beyond that originally submitted in the application.

5.1 B8 – Heritage Interpretation Plan

It is proposed to amend Condition B8 in order to specifically reference the need to amend the Heritage Interpretation Plan (HIP) in order to reflect the works proposed in Modification 18.

A Heritage Interpretation Plan for the site must be prepared in consultation with Council and the Heritage Council and submitted to the satisfaction of the Secretary prior to the issue of Construction Certificate 6 – Façade and Finishes (CC6) for the Lands Building. The Plan may be prepared and submitted separately for each building to the Secretary for separate endorsement. The Plan must be prepared by a suitably qualified and experienced heritage practitioner or historian.

The Heritage Interpretation Plan must detail how information on the history and significance of the site will be provided for the public and make recommendations regarding public accessibility, signage and lighting (specifying whether subject to approval). Public art, details of the heritage design, the display of selected artefacts are some of the means that can be used.

*The Heritage Interpretation plan must specify the location, type, materials and contents of the interpretation device being proposed. The plan must include retention for display within the building of sections of the Lands Building cast iron roof trusses and roof crestings. **The plan must also include the relevant interpretation elements as proposed under Modification 18, including interpretation of historical construction techniques associated with the ceilings and cornices.***

Documentary evidence that the approved Plan has been implemented shall be provided to the satisfaction of the Secretary, in consultation with Heritage Council and Council prior to the issue of any Occupation Certificate. If a Plan is approved for each building, documentary evidence that each approved Plan has been implemented shall be provided to the satisfaction of the Secretary, in consultation with Heritage Council and Council, prior to issue of the Occupation Certificate for the building it relates to.

5.2 Condition B44A – Heritage conservation works schedules and heritage protection construction plan

Condition B44A is to be updated to specifically reference the methodology for the removal and reinstatement of the Lyon and Cottier Royal Coat of Arms. It is further proposed that this condition is amended to enable confirmation of the three rooms where ceilings are to be reinstated, consistent with the approved methodology under this condition, having been selected as three rooms of exceptional heritage.

An experienced heritage materials conservator must prepare a methodology to temporarily remove, store and then reinstall historic materials or to reconstruct affected significant features under the supervision of the project heritage consultant in the following areas after demolition and structural augmentation:

- Lower Ground Level - Bridge Street foyer **including the Lyon and Cottier Royal Coat of Arms;**
- Lower Ground Level - Loftus Street foyer;
- Ground Level - Bridge Street landing;
- Ground Level - Board Room;
- Ground Level - Farrer Place foyer;

- Ground Level - Loftus Street landing;
- Level One - Loftus Street landing; ~~and~~
- Level Five – the Gallery and Annex; ~~and~~
- **cornices within rooms G.01 (Chief Surveyor's Room), G.04 (Records and Correspondent's Room) and G.07 (Minister's Room).**

The methodology is to be submitted to the Heritage Council NSW for approval prior to the commencement of any works to the first affected area.

5.3 Condition B44B – Update of Schedule of Conservation Works

It is proposed that Condition B44B be updated to require amendment of the Schedule of Conservation Works to include the works proposed in Modification 18.

*Prior to the commencement of the additional works associated with Modification 15 (see note below) **and the works proposed under Modification 18**, the Schedule of Conservation Works for the Lands Building shall be updated to include the additional demolition, reinstatement and associated conservation works.*

Note:

The additional works associated with Modification 15 exclude those previously approved as part of Modification 4 and Modification 9 being:

- *demolition extents of the WC locations adjacent the central stairs and in the northern and southern courtyards, at the Lower Ground Mezzanine level of the Lands Building*
- *demolition extents to the floor adjacent to the Loftus Street entry at the Ground Level of the Lands Building*
- *the gantries at Ground Level, Level 1 and Level 2 of the Lands Building, except those portions identified as being removed for reinstatement.*

It appears that Condition B44B was not included in the consolidated consent issued and its inclusion is requested in the next version of the consolidated consent to be issued .

5.4 Condition B44C – New Condition

It is proposed that Condition B44C is created enable confirmation of the three rooms where ceilings are to be reinstated, consistent with a methodology to be prepared, being the three rooms of exceptional heritage.

An experienced heritage materials conservator must prepare a methodology to temporarily remove, and then reinstate historic cornices within the following rooms per Modification 18:

- ***G.01 (Chief Surveyor's Room);***
- ***G.04 (Records and Correspondent's Room); and***
- ***G.07 (Minister's Room).***

The methodology is to outline the use of plaster and contemporary methodology for the reinstatement of the cornices.

The methodology is to be submitted to the Heritage Council NSW for approval prior to the commencement of reinstatement works to the relevant room. Each room can be provided with a separate methodology if necessary.

5.5 B48 – Archival Recording

It is proposed that Condition B48 is updated to include reference to the ceilings and cornices to be recorded for archive purposes including a 3D Point Cloud survey.

An archival photographic recording of all areas of exceptionally significant fabric is to be undertaken prior to, during and after the works in accordance with CMP Policy 6.9.3 and is to be commenced prior to the issue of the relevant construction certificate. This is to document the changes and to ensure that the appearance of those identified elements remains unaffected in the long term following reinstatement. This recording must take place in accordance with the Heritage Division document entitled, Photographic Recording of Heritage Items using Film or Digital Capture. The original copy of the archival record shall be submitted to the Heritage Division within one month of the works completion.

The works under Modification 18 relating to ceilings and cornices are to be photographically recorded for archive purposes including a 3D Point Cloud survey (or similar technology) prior to works approved under Modification 18 commencing in each relevant room. The survey is to be provided to Heritage Division with one month of the all the works completion. Works and archival photography can be staged as required.

5.6 B44D – New Condition

It is proposed that a new Condition B44D is created to require detailed design plans to be prepared to address the replacement of ceilings and cornices removed under Modification 18 addressing existing fabric in terms of height, design, colour and the like dependant on the significance of the relevant room.

Prior to the commencement of works under Modification 18, detailed plans for each room where ceilings and cornices are being replaced are to be prepared and submitted to the Planning Secretary. The design must ensure that the new ceilings and cornices proposed generally match the existing heritage ceilings and cornices in terms of replication of design and cornice type.

Rooms are to be defined on the detailed plans as one of the below:

- ***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: rooms G.01 (Chief Surveyor's Room), G.04 (Records and Correspondent's Room) and G.07 (Minister's Room).***
- ***Rooms of exceptional or high significance (per the CMP) which have high ceilings with 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***
- ***Secondary rooms (namely, smaller spaces) with lower height 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***

Other rooms are to reflect the approved hotel use and utilise neutral colours.

Cornice types are to be rationalised to between 12 and 15 types in total and confirmed as part of detailed design plans.

The replicated cornices are to use contemporary equivalents of materials and finishes 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 manufacture.

All new ceilings are to be finished to a standard that is generally consistent with the original set plaster finish.

Ceiling replacement is to use contemporary construction techniques with contemporary materials which is to be documented as part of the detailed design plans.

5.7 B49A - Update of Salvage Methodology

It is proposed that condition B49A is updated to require the preparation of a salvage methodology for Modification 18 works.

*Prior to the commencement of the additional works (as described in Condition B44B) associated with Modification 15, **and the works associated with Modification 18**, the Salvage Methodology shall be updated to include the additional works **under Modification 15 and the works associated with Modification 18**. The methodology must detail how all architectural elements and fabric, which are to be removed, are to be stored and reused within the Lands Building.*

The updated Salvage Methodology shall be prepared in consultation with the project heritage consultant and endorsed by the Heritage Council of NSW or its delegate prior to the works commencing.

The methodology can be prepared in a staged manner to align with the works occurring under each Modification listed in this condition.

5.8 B49B – Reinstatement Methodology

It is proposed that Condition B49B is updated to include the preparation of a reinstatement methodology for the Lyon and Cottier Coat of Arms as proposed under Modification 18.

*Prior to the commencement of the additional works (as described in Condition B44B) associated with Modification 15, a Reinstatement Methodology shall be prepared for the temporary removal of retained portions of existing courtyard gantries and stone floors to three areas within the Lower Ground Floor corridors of the Lands Building. **Prior to the commencement of works on the Lyon and Cottier Coat of Arms under Modification 18, a reinstatement methodology for the Lyon and Cottier Coat of Arms is to be prepared.***

The Reinstatement Methodology shall be prepared in consultation with the project heritage consultant and endorsed by the Heritage Council of NSW or its delegate prior to the works commencing.

6.0 Updated Project Justification

The modification application relates to the replacement of heritage ceilings and coke breeze elements within the Lands Building as a result of detailed on-site investigations which indicate that large areas of these ceilings are at risk of collapse and/or, irrespective of potential permanent stabilisation, are incapable of meeting the fire safety requirements applicable to the building.

The modified development remains consistent with the approved Stage 1 SSD consent and relevant statutory and strategic plans and policies that apply to the site.

The proposed modifications ensure that the development continues to deliver the adaptive reuse of the state significant heritage buildings for tourist and visitor accommodation use as contemplated – fully consistent with the approved Stage 1 consent and conditions.

While noting differences in construction methodologies, the high-quality craftsmanship and application of a plaster finish to the ceilings/cornices of the recently completed Education Building, demonstrates the expected quality and finish of the replaced ceilings and cornices for the Lands Building – refer to images below.



Figure 1 *Example of completed works within the Education Building*

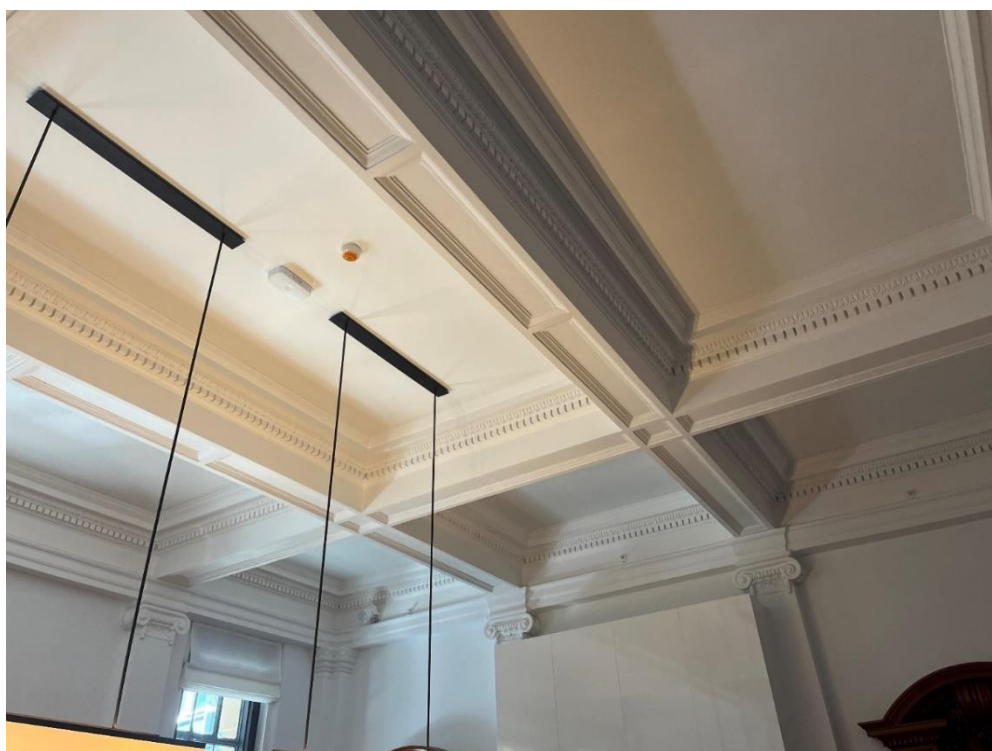


Figure 2 *Precedent quality and finish of ceilings*

In accordance with section 4.55(2) of the EP&A Act, the DPE may modify the consent as the proposed development remains substantially the same development as that originally granted.

The Proponent believes that the above information and attachments will assist DPE in formalising its assessment as required.

Yours sincerely,



Alexis Cella

Director

acella@ethosurban.com



Christopher Curtis

Associate Director

ccurtis@ethosurban.com