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## Government Property NSW

Stage One Proposal for Tourism Re-use  
Former Lands and Education Department Buildings  
“Sandstone Precinct”, Bridge Street, Sydney

### Statement of Heritage Impact



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# 1.0 Introduction

## 1.1 Background and Public Policy Context

### 1.1.1 Public Policy Context

This Statement of Heritage Impact (SHI) has been prepared on behalf of Government Property NSW (GPNSW). It forms part of the overall Stage One SSD Environmental Impact Statement, responding to a major NSW Government initiative to seek the revitalisation of the Lands Department and Education Department buildings in Bridge Street, Sydney, following the impending vacation of the buildings by their respective, long term government agency occupants.

The proposed project responds to various tourism initiatives by the State Government, including *NSW 2021 A Plan to Make NSW Number One*, and *Visitor Economy Industry Action Plan*. GPNSW has identified the "Sandstone Precinct", comprising the Lands and Education Department Buildings and the adjacent Farrer Place, as a preferred location for tourism and visitor accommodation uses. In late 2013 GPNSW sought Registrations of Interest (ROI). This was followed, in October 2014, by a call for Expressions of Interest (EOI) from developers, investors and hotel operators who have an interest in adaptively re-using these fine historic buildings for tourism related purposes.

To assist in providing further certainty to potential purchasers, GPNSW is seeking approval from the Minister of Planning for a Stage One Development Application which establishes the project concept. A subsequent detailed design will be prepared and submitted, as a Stage Two Development Application, by the preferred proponent, once such a group has been selected by the Government.

The following public policy context has been drawn from the Request for SEARS for Stage One of the project, as submitted by Urbis in October 2014.

*In response to the State Government's various tourism initiatives, including NSW 2021 A Plan to Make NSW Number One and Visitor Economy Industry Action Plan, GPNSW has identified the 'Sandstone Precinct' as a preferred location for tourism and visitor accommodation uses and in late 2013 sought 'Registrations of Interest' (ROI) from developers, investors and hotel operators who had an interest in adaptively re-using the buildings for these purposes.*

*To assist with providing further certainty to potential purchasers, GPNSW is seeking approval from The Minister for Planning for a Stage 1 Development Application which establishes a development 'concept', with detailed design elements and physical works to be subject to a later separate (Stage 2) development application.*

*The Stage 1 DA will seek approval for the use of the Sandstone Precinct for tourist and visitor accommodation (and ancillary uses) and a building envelope defined by a maximum building height that will facilitate the adaptive re-use, extensions and alterations to the existing buildings.*

*It is also intended to use this Stage 1 DA process to establish the potential for subterranean linkage between the two buildings as well as subterranean opportunities for the provision of support infrastructure, loading, access and car parking that could be located under existing road reserves. The ultimate opportunity for the use of subterranean space below road reserves will be subject to the separate agreement with the City of Sydney.*

*This project represents a unique strategic opportunity to promote the adaptive re-use of tourism and visitor accommodation in an iconic precinct in the heart of Sydney's CBD. This accords with State, Regional and Local strategic initiatives to promote tourism and ultimately contribute to doubling the visitor expenditure of NSW by 2020.*

### **1.1.2 Procedural Context of the Document**

This Statement of Heritage Impact has been prepared in response to the final Secretary's Environmental Assessment Requirements (SEARS) for Application SSD 6751. It encompasses two major historic buildings in Central Sydney, collectively known as the "Sandstone Precinct": it has been prepared on behalf of Government Property NSW (GPNSW) by Graham Brooks and Associates, Heritage Consultants (GBA).

- 23-33 Bridge Street, (Lands Department Building)
- 35-39 Bridge Street, (Education Department Building)

The particular final SEAR responded to by this Statement of Heritage Impact is:

*Item 4, Heritage:*

*The EIS shall provide a Heritage Impact Assessment which addresses:*

- *All heritage items (state and local) including the subject sites and surrounding sites, and why the items and sites are of heritage significance, what impact the proposed use will have on the significance, what measures are proposed to mitigate negative impacts, and why more sympathetic solutions are not viable;*
- *Impacts of the proposed use on the visual character of the area and its historical associations with government uses;*
- *The suitability of the site for the proposed use and its implications on heritage conservation, including discussion on any other uses that have been considered and discounted;*
- *Impacts of potential changes to the public domain, including access and landscaping;*
- *Updated Conservation Management Plan(s) for the two buildings, addressing the proposed use including measures to minimise impacts of future development of the site; and*
- *A preliminary archaeological assessment of the potential for Aboriginal cultural heritage, European cultural heritage and other archaeological items on the site, how such archaeology would be impacted by the proposal, and potential mitigation, in-situ conservation and interpretation measures for any archaeological resources uncovered during the works.*

The archaeological assessment component of the SEARS is beyond the scope of this SHI and has been undertaken by a specialist consultancy and is presented to the Department under separate cover.

### **1.1.3 Additional assessment requested by NSW Heritage Council**

In response to the request from the NSW Department of Planning, the NSW Heritage Council responded with a letter dated 4 November 2014, setting out a request for information across a range of issues. This requested information was to be in addition to that contained in the original SEARS issued by the Department. Item 3 of their letter also referred to Archaeology information and analysis, which is outside the scope of this Statement of Heritage Impact. Some of these items are now contained in the amended SEARS,

While some of these items were not carried over to the final SEARS on which the EIS has been formulated, it was felt appropriate to respond to these various additional issues within this Statement of Heritage Impact. Refer to Section 3.2 below

*It is requested that the applicant be required to submit a detailed Heritage Impact Assessment Report providing the following information in addition to the requirements contained in the Draft SEARS:*

#### **1. Proposed change of use**

- a. A detailed description of the proposed uses and suitability of the site for the proposed uses including discussion of any other uses that have been considered & discounted in order to demonstrate that the final proposal is the best option with least heritage impacts;*
- b. What alterations and additions may be required to the interior and the exterior of the two buildings to accommodate the proposed uses and what are their potential impacts;*
- c. What future fire safety and easy access measures may be required to allow the proposed uses and what are their potential impacts;*
- d. What HVAC works will be required to allow the proposed uses and what are their potential impacts;*
- e. What other services will need to be upgraded and augmented? How will this work be carried out and what will be the potential impact;*
- f. How much and what type of signage will be required internally and externally to allow various proposed uses and what are their potential impacts; and*
- g. Would the proposed uses require subdivision of any internal spaces by way of internal partitions? How will that be achieved without impacting on their significance and spatial qualities?*

#### **2. Additional floors on the Education Building**

- a. It is understood that there is no proposal to add any floor space on the Lands Building. However, three floors are proposed to be added on top of the Education Building. These floors will remain within the existing height of the lift motor room (RL 58.69). The extent of the additional floors and setback from the existing building facades must be clearly identified;*
- b. Visual impact assessment of the proposed floors must be included as part of the Heritage Impact Assessment using photo montages (showing before and after shots) and three dimensional representations. These photomontages should include views from all significant view points and from any tall buildings in the vicinity;*
- c. The Heritage Impact Assessment must specify if there will be any plant and equipment located above the RL 58.69 that has been proposed to define the maximum height of the additions;*
- d. The heritage impact assessment should provide a well-argued justification for the proposed setbacks and the intensification of development within the proposed building envelope;*
- e. Discussion of any other options that have been considered and discounted in order to demonstrate that the final proposal is the best option with least heritage impacts.*

#### **4. Public Domain**

- a. Impact on the visual character of the area in the vicinity, being a group of historically significant and highly articulated, architecturally significant buildings forming the seat of power for NSW Government, must form part of the Heritage Impact Assessment report;*
- b. Any potential changes to the public domain including physical changes, traffic, changes and landscaping changes must also be discussed as part of the Heritage Impact Assessment.*

### **5. Impact on the Heritage Significance**

- a. Detailed discussion of the likely impacts of the proposal on the overall heritage significance of the subject properties and the area in general; and
- b. Discussion of the likely impacts of the proposal on the heritage significance of any significant heritage buildings in the vicinity.

### **6. Conservation Management Plan**

- a. It is also considered that the Heritage Impact Assessment to be submitted with the application should assess the proposals against the policies of Conservation Management Plans, for the two buildings, endorsed by the Heritage Council of NSW.

### **7. Moveable Heritage Items**

- a. These buildings contain a significant collection of moveable heritage items consisting of furniture, fittings, fixtures, artworks, artefacts and other items associated with the Government use over a long period of time. It is noted that the draft CMPs submitted for endorsement by the Heritage Council include sections on moveable heritage with a list of items. The Heritage Impact Assessment accompanying the application must:

- i. assess compliance with the policies contained in these sections of the CMPs; and
- ii. identify any likely impacts on the significance of these moveable heritage items arising out of the proposed change of use and potential alterations & additions that may be required by the proposed use.

- b. It is recommended that a formal Collections Management Plan be submitted, either separately or combined, with the development application at stage 2, providing detailed recommendations on the future display conditions, conservation management, security and location of each of the identified moveable heritage items.

## **1.1.4 Specific Use Request**

The specific nature of the Stage One project, as submitted to the Department, encompasses:

- Change of use of the Lands Department and the Education Department Buildings in Bridge Street for tourist and visitor accommodation and ancillary uses.
- A vertical expansion of the permissible building envelope of the Education Department Building that extends approximately 3 levels above the existing parapet to a maximum height that is consistent with the top of the existing lift motor room. There is no request for an expansion of the building envelope of the Lands Department Building.
- It is also intended to use this Stage 1 DA process to establish the potential for subterranean linkage between the two buildings in order to minimise/avoid the need for major new entries through the highly significant street facades of the two buildings. In addition, subterranean opportunities will be explored for the provision of support infrastructure such as loading, access and car parking that could be located under existing road reserves. The ultimate opportunity for the use of subterranean space below road reserves will be subject to the separate agreement with the City of Sydney.
- The intent of the project is to celebrate the differences between the two buildings and their shared importance in the development of Sydney and their unique location.

The assessment of heritage impact undertaken for the preparation of this report has concluded that the proposed development concept and adaptive re-use of the Lands and Education Department Buildings and surrounding public domain, including potential subterranean areas, has been formulated in a manner which minimises and mitigates some relatively minor adverse impacts on the heritage significance of the places.

The Conservation Management Plans for the two buildings, which were in the process of being updated in consultation with the NSW Heritage Division at the time of writing, provide an appropriate and adequate framework for the on-going conservation and assessment of the future detailed adaptive re-use design by the future long term lease holder of the site.

This SHI report assesses a range of alternative uses that could be applied to the site in the context of relocation of the traditional occupying departments. These include occupation by another government or private sector commercial office user, residential conversion, cultural institution and re-use for tourism related purposes.

Overall, the Statement of Heritage Impact concludes that there is a strong potential for the project to mobilise extensive private sector financial resources and for their application to the retention, conservation and sensitive adaptive re-use for tourism related purposes of the fine and distinctive historic Lands and Education Department Buildings. Such a project, once defined in detail is highly likely to have a very positive outcome on the long term continuity and evolution of their heritage significance, architectural character and public accessibility. There is also likely to be a positive activation of the surrounding public realm from the increased pedestrian traffic associated with high quality tourism related re-use.

### **1.1.5 Heritage Buildings and Tourism Re-use**

In the context of the current SSD 6751 application to the Department of Planning, it is important to recognise current best practice in terms of ICOMOS International, as reaffirmed at the November 2014 18<sup>th</sup> General Assembly in Florence. The embodiment of this best practice, as relevant to the project is the concept that:

*Conservation can be regarded as the Management of Change, while ensuring the continuity and evolution of the Heritage Significance of the Place.*

The explanatory notes to Article 1.2 of the Australia ICOMOS *Burra Charter* (2013 version) recognise the important concepts that:

- *Cultural significance may change over time and with use.*
- *The understanding of cultural significance may change as a result of new information.*

In addition, the two primary drivers of intervention with regard to historic buildings and places throughout the world, over thousands of years have been:

- Intervention to conserve, repair or reconstruct damaged, decayed or threatened fabric
- Intervention to breathe new life into redundant buildings or to extend the functional life of places that have become inadequate or unfit for contemporary requirements.

Unlike many societies and regions that have experienced urban and building development for many centuries, the Australian settlement experience over the first two centuries was characterised by the majority of buildings being retained in their original use, whether domestic, commercial, institutional or industrial, etc. The experience since the later decades of the 20<sup>th</sup> century has been that the vast majority of non-residential historic buildings throughout Australia have experienced at least one change of use, often the result of redundancy or economic/cultural circumstances.

Changes of use have been a particular characteristic of historic public sector buildings and places, most relevantly in Sydney and throughout NSW. In many cases these changes of use have resulted in a dramatic uplift in their utility for contemporary life, their imagery in the public mind and the longevity of their heritage significance. Equally, many buildings and places have taken on additional layers of character and heritage significance.

Internationally and nationally, the use and re-use of historic buildings by the tourism sector or for uses that reflect a public interest among local citizens and visitors, has been a major fact of life for centuries. There are hundreds, if not thousands of examples internationally whereby tourism activities or tourism related development have provided welcome opportunities for the built environment of communities to be revived or revitalised and for major benefits to flow back to the host community. The best practice management and facilitation of such revitalisation of significance is a major objective of the *ICOMOS International Cultural Tourism Charter*.

Hotel and tourism re-use of historic buildings has proven to be one of the most successful and sympathetic mechanisms for the conservation and revitalisation of historic buildings world wide since at least the middle decades of the 20<sup>th</sup> century. It is well recognised that the tourism sector seeks to promote the distinctive character of the particular destination in which a particular hotel or facility is located. Coupled with large injections of financial capacity and sensitive design expertise, many modern hotels have been sensitively integrated into redundant historic buildings, via a change of use and public imagery.

Recent examples of Sydney based heritage buildings being converted to hotels include:

- State/Gowings Buildings
- Sydney Water Head Office Building
- Woolloomooloo Wharf
- Pier One, Walsh Bay
- 1888 Hotel, Pyrmont
- No 1 Martin Place, Westin Hotel

Most of these were buildings were converted under the guidance and with the consent of the NSW Heritage Council.

A small selection of international examples of tourism related re-use projects include:

- The historic palace hotels across Rajasthan, India
- Fullerton Hotel in former Central Post Office, Singapore
- Admiral Hotel in former Warehouse, Copenhagen
- Four Seasons Hotel in former prison, Istanbul
- Former Monasteries across Spain and Portugal
- Former caravanserai, Kusudasi, Turkey
- Former 19<sup>th</sup> century bathing facility in the historic spa town of Bath UK

The tourism sector is also vitally interested in the periodic upgrade of historic hotels in order to maintain their market positioning but also to ensure that the historic fabric of the building is well maintained and presented. Major upgrades of historic hotels include such examples as Raffles Hotel, Singapore and the Euston Station Hotel, London. In Paris the recent renovation of the 1908 Majestic Hotel as the Paris Peninsula Hotel has challenged such famous hotels in the city such as the Ritz and the Carillon, to undertake their own upgrades.

The publicity brochure for the newly opened (October 2014) Peninsula Hotel in Paris captured the idea very clearly. "Steeped in history, the property has been meticulously restored and discretely modernised with the ultimate of 21<sup>st</sup> century convenience"

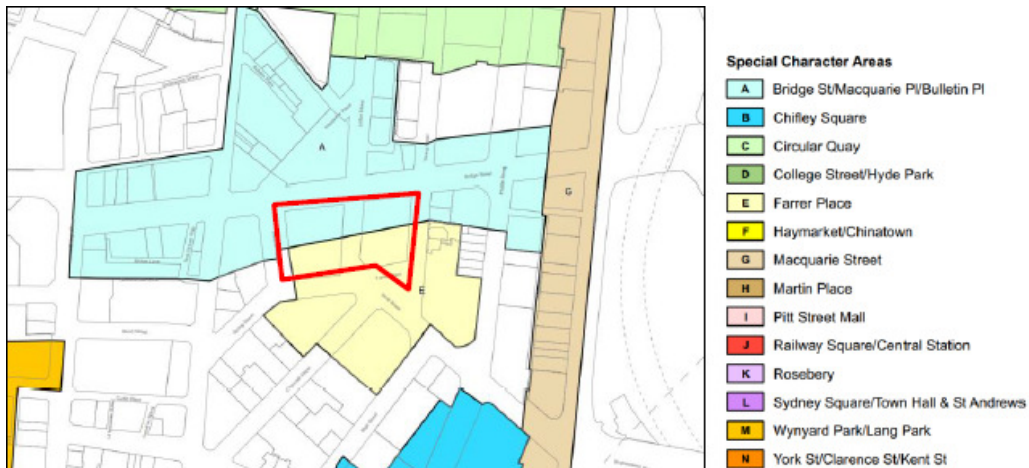
## 1.2 The "Sandstone Precinct"

For the purposes of SSD 6571, the "Sandstone Precinct" which is the subject of the proposal comprises the two major historic public buildings the Lands Department Building (23-33 Bridge Street) and the Education Department Building (35-39 Bridge Street). It also encompasses the adjacent road and public reserve areas of Loftus Street, Gresham Street and Farrer Place.



The "Sandstone Precinct" sits within two special character precincts within Central Sydney under the Sydney DCP 2012. See further discussion in Section 1.4.4 below.

- Bridge Street/Macquarie Place/Bulletin Place Special Character Area
- Farrer Place Special Character Area



*The location of the Sandstones Precinct relative to the two adjoining Special Character Areas*

## 1.3 The Two Buildings

### 1.3.1 Lands Department Building

Located at 23-33 Bridge Street, Sydney, this free standing four storey building occupies the entire city block surrounded by Bridge, Loftus, Bent and Gresham Streets, immediately to the west of the Education Department Building. Its primary frontage is to Bridge Street, although there are secondary pedestrian entries from Loftus and Gresham Streets. The Gresham Street pedestrian entry is the only one with direct disabled access provisions. Vehicular access to a small ground level loading dock is available from the Gresham Street near the Bent Street intersection. In plan form, the entire building is arranged around a large central light well that contains a tower deliberately designed to provide fire resistant storage facilities for the documentary survey, land and property records prepared by the Lands Department. The roovescape of the building is enlivened by a distinctive tower and several large square-domed spaces. There is also a stormwater drainage tunnel around the perimeter of the building, set below the level of the adjoining footpaths.

This large sandstone clad building, which embodies a dramatically modelled Victorian Free Classical exterior with deep verandahs and elaborate Victorian interiors that reflect in their detailing and spatial composition the varying institutional status of its original occupants. It was erected in two major stages:

- The northern half facing Bridge Street in 1876, to the design of the important late 19<sup>th</sup> century Government Architect, James Barnet
- The southern half facing Bent Street in 1893, in a matching style to the original component.

The building also contains a number of "moveable" heritage artefacts including furniture and plaques, reflecting the history and use of the building. The main historic documentary records of the Lands Department were relocated to new off-site archives in 2014.



*The Lands Department Building, with its distinctive corner tower and richly decorated sandstone façade, viewed from Spring Street (GBA)*

### 1.3.2 Education Department Building

Located at 35-39 Bridge Street, Sydney, this free standing seven and eight storey building occupies the entire city block surrounded by Bridge, Loftus, Young Streets and Farrer Place, immediately to the east of the Lands Department Building. Its primary frontages and pedestrian entries are Bridge Street to the north and Farrer Place to the south, with a vehicle entry from Loftus Street into a sizeable ground level parking area. The entire building was erected with a large internal lightwell, extending to the full height of the building. The upper level of the northern half of the building contains an art gallery style space lit by a series of impressive skylights.

This large sandstone clad building, which demonstrates a well ordered Edwardian architectural style, is considered a fine example of an early 20th century Government Administration building. It was erected in two stages:

- The northern section, comprising seven storeys and facing Bridge Street, between 1912 and 1914, to the design of George McCrae, Government Architect
- The southern half of the building, comprising eight storeys and facing Farrer Place, between 1929 and 1930 to the design of the private sector architect, John Reid & Son.

The second stage of the building was designed using a full structural steel frame and sandstone façade cladding, in contrast to the steel framed and traditional masonry construction of the older section. Major renovations to the building in the 1990s were designed by the noted Sydney Architects, Ancher Mortlock Woolley. They included the installation of an "external" circulation pathway around the inner lightwell, serving all upper floors and providing a new circulation pathway that maximised the planning efficiency of the relatively open office floors within the main volumes of the building.

The building also contains a number of "moveable" heritage artefacts including furniture and plaques, reflecting the history and use of the building. There is also a large art collection associated with historic initiatives of the Education Department. Documentary research undertaken for the preparation of the CMP revealed that there may be archaeological relics, related to earlier periods of European occupation, located under the north western quadrant of the overall footprint of the building.



*Education Department Building with Lands Department in the background (GBA)*

## 1.4 Current Heritage Listings

### 1.4.1 Lands Department Building

The statutory heritage management listings affecting the future management and potential adaptive re-use of the Lands Department Building are:

- Listed on the NSW State Heritage Register under the NSW Heritage Act, 1977 (SHR No. 00744).
- Listed in Schedule 5 of the *Sydney Local Environmental Plan 2012* (Inventory No. 1683) as a heritage item - Former 'Department of Lands' building including interior.
- Included in the Bridge Street/Macquarie Place/Bulletin Place Special Character Area under the Sydney DCP 2012.
- Listed on the Department of Land and Water Conservation, Section 170 Register. (Heritage and Asset No. 54131).

Non statutory heritage listings applicable to the building comprise:

- Classified by the National Trust of Australia (NSW)

The Lands Department Building also forms part of a nomination for inclusion on the National Heritage List, currently under consideration by the Australian Heritage Council for an area of Sydney currently called "Colonial Sydney". The area includes many sites fronting Macquarie and Bridge Streets and beyond, including the Education Building. The National Heritage List falls under the Commonwealth Government *Environmental Protection and Biodiversity Act 1999* (EPBC Act 1999).

### 1.4.2 Education Department Building

The statutory heritage management listings affecting the future management and potential adaptive re-use of the Education Department Building are:

- Listed on the NSW State Heritage Register under the NSW Heritage Act 1977. (Item 00726)
- Listed as a Heritage Item of State Significance on *Sydney Local Environmental Plan 2012* (Item 1684)

Non statutory heritage listings applicable to the building comprise:

- Register of the National Estate (Listing ID 1793)
- Classified by the National Trust of Australia (NSW)
- Australian Institute of Architects Register of Significant Architecture in NSW (Number 4700597).

The Education Department Building also forms part of a nomination for inclusion on the National Heritage List, currently under consideration by the Australian Heritage Council for an area of Sydney currently called "Colonial Sydney". The area includes many sites fronting Macquarie and Bridge Streets and beyond, including the Education Building. The National Heritage List falls under the Commonwealth Government *Environmental Protection and Biodiversity Act 1999* (EPBC Act 1999).

### 1.4.3 Palm Trees, Farrer Place

The Palm Trees in Farrer Place are separately heritage listed in the Sydney LEP 2012, although the intent of the listing does not apply to its physical, urban or architectural characteristics.

The Statement of Heritage Significance for the Palm Trees in Farrer Place, as contained in the NSW State Heritage Inventory is as follows:

*The trees are a landmark feature and form the focal points for the views along Bent Street and O'Connell Street. The trees are of cultural, historic and aesthetic significance.*

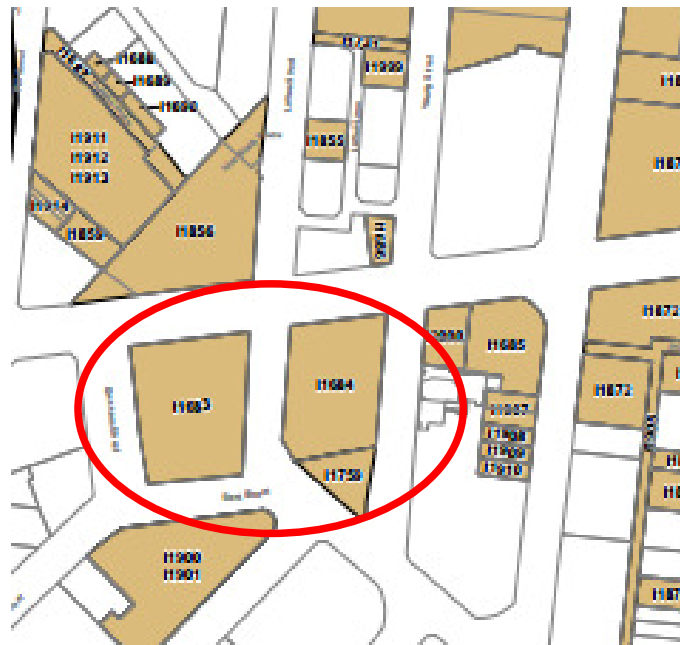
### 1.4.4 Heritage Items in the Vicinity

In accordance with the heritage management objectives and controls of Sydney LEP 2012 and Sydney DCP 2012, the assessment of heritage significance for SSD 6751 must also take account of the likely heritage impact on the significance of nearby listed heritage items and on the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.

Listed heritage items in the vicinity that might be affected by the Stage One proposal are:

- SLEP 2012 Item 1856, Macquarie Place
- SLEP 2012 Item 1686, 44 Bridge Street
- SLEP 2012 Item 1900, 1-7 Bent Street Façade
- SLEP 2012 Item 1901, 2-6 Spring Street Façade
- SLEP 2012 Item 2000, 36-42 Young Street

Other heritage items in the locality, including First Government House Site, Chief Secretary's Building, 50 Philip Street, former Treasure Building, and the buildings to the north west of Macquarie Place are not regarded as being sufficiently in the vicinity of the subject site to have their significance potentially impacted upon by the SSD 6751 proposal.



Extract from the Heritage Item Map of Sydney LEP 2012, showing the subject site and heritage items in the locality



*Education Department Building looking east along Bridge Street towards the Young Street Terraced Houses and Chief Secretary's Building in the distance. Only the Young Street buildings are sufficiently close to the Education Department Building to potentially be affected by the potential roof top addition. (GBA)*



*Looking down Young Street towards 44 Bridge Street (GBA)*

Statements of Heritage Significance for the various heritage items in the vicinity of the Sandstone Precinct, as contained in the NSW State Heritage Inventory are as follows:

### **SLEP 2012 Item 1856, Macquarie Place**

*Macquarie Place represents one of the most historically significant urban spaces in Sydney and Australia, which was first established less than 25 years after the arrival of the First Fleet. The 1810 park and its later monuments outline the development of Sydney since its colonial foundation. Macquarie Place was the first and main town square of colonial Sydney and is a surviving remnant of the first town centre of Sydney beside First Government House (now demolished) and on the original foreshores of Sydney Cove before the shoreline was extended. The Obelisk, erected in Macquarie Place in 1818, is the geographic centre point of nineteenth century Sydney, the Colony, and the network of nineteenth century roads throughout NSW. It was erected in this location by Governor Macquarie to mark the place from where all public roads were to be measured and has continued to perform this function over most of the history of European settlement in Australia, for over 190 years. The park and monument were well recognised landmarks of colonial Sydney and appeared in many nineteenth century artist views, including paintings by Conrad Martens.*

*Although the original importance of Macquarie Place as the main town square of Sydney, the geographic and symbolic centre of the Colony, the setting to First Government House and the landmark qualities of Obelisk are now less apparent than in Colonial times due to the level of surrounding changes, the park and its monuments remain one of the few tangible links to this first Colonial town centre and thereby part of the earliest history of European settlement in Australia. It is also possibly the only remnant of the natural landform of the original foreshores of Sydney Cove which has survived relatively unchanged over two centuries of European settlement, and can therefore symbolise the first place of meeting between Aboriginal people of the Eora Country and British settlers at Sydney Cove in 1788.*

*Macquarie Place represents the oldest planned town square in Australia. Together with Hyde Park, it is also the oldest urban park in Australia, and has been in continuous use as a public space for at least 195 years, possibly operating as a public place of gathering from as early as 1791. The Obelisk is the oldest milestone for measuring of roads in Australia and the second oldest known European monument in Australia. The inscriptions on the Obelisk provide evidence of the extent of the small colony in 1818 when the colony was first expanding into the interior of New South Wales. The Obelisk was also the 'symbolic peg' indicating the far extent of the British Empire in the early 1800s.*

*Macquarie Place and the Obelisk are rare surviving evidence of the transition of the Colony from a rough penal settlement to a planned town during the early 1800s under the direction of Governor Macquarie. This transition is demonstrated by the function of the Obelisk in the expansion of the Colony, by the establishment of a formal centre to the Colony, by the first formal layout of public space, and by the quality and design of the park and monument. The Obelisk and Macquarie Place are fine examples of the layout and ornamentation of Sydney town and its public spaces in the Georgian style, and rare surviving remnants of Macquarie's Georgian town plan for Sydney, together with the Hyde Park Barracks, St James Church, and First Government House Stables (now the Conservatorium). The Obelisk was designed by one of the most celebrated architects of the Colonial period, Francis Greenway, and was built by stonemason, Edward Cureton, with convict labour.*

*These qualities of the Obelisk and Macquarie Place symbolise Macquarie's vision for a permanent planned settlement, which provided the genesis for the development of the nation, and which far exceeded the views of the British Government of the Colony as simply a penal settlement. When the Obelisk was first erected in Macquarie Place, Commissioner Bigge, representing the British Government, found even this simple monument too grand for a penal colony. Governor Macquarie defended the expense and design of the monument with indignation as a "little unadorned Obelisk...rendered at a trifling expense, somewhat ornamental to the Town" which in his view did not "merit any censure". It was this difference of opinion that contributed to the resignation of a disillusioned Governor Macquarie, and*

meant that many of his plans and Greenway's designs for an elegant Georgian township were not realised.

The "Sirius" cannon and anchor mounted in Macquarie Place are rare relics of the first defences of the Colony by the man-of-war flagship of the First Fleet that arrived in Sydney Cove in 1788. Both the cannon and anchor have been mounted in Macquarie Place for over a century after the canon and anchor were salvaged from the wreck of the vessel in 1791 and 1905 respectively and mounted at Macquarie Place in the 1880s and 1907. Macquarie Place is also the site of the first constructed defences of Sydney Cove when the First Redoubt was built at its northern end as the first fortification of Sydney from 1788-1791.

Later public monuments and structures constructed in Macquarie Place illustrate the continued civic importance of the park and demonstrate the continued evolution and achievements in the civic planning, services, design, construction, industry and growth of Sydney since Colonial times.

### **SLEP 2012 Item 1686, 44 Bridge Street**

The building reflects an important period of development in the city during the 1930s as well as the association of this area of the city with professional premises. It is an excellent and rare expression of the Functionalist style meeting a need for continuous natural light, through bands of windows, to accommodate Wool Broking activities. Such an uncompromising approach to the Functionalist tradition of office design is rare in the CBD. The building's scale, proportions and materials are contextually appropriate for its location in one of the city's most important historic streetscapes in Bridge Street and skilfully addresses its prominent corner site. The later conversions reflect important changing uses in the CBD.

### **SLEP 2012 Item 1900, 1-7 Bent Street Chatsworth House Façade**

No separate listing or statement of heritage significance could be located for the remnant façade of Chatsworth House at 1-7 Bent Street, in the NSW Heritage Inventory.

### **SLEP 2012 Item 1901, 2-6 Spring Street Orient Building Façade**

Macknade house is an award winning building reflecting the attitudes to architecture in Australia and Britain in the 1940's. It is a good example of the influence of English design in Australia after the recession and an early example of the work of Fowell and McConnell, prominent Sydney architects of the Post War period. The building, a seven storey steel and concrete framed construction, has a simple and clear facade, to Spring Street, made up of well defined elements. The flat surface of the facade is punctured by a regular fenestration pattern giving the building a distinct classical feeling. There is a tripartite composition within the modulation of the facade; ground floor section and top floor with balcony. Surfaced with polished granite with aluminium windows, the facade even though classically derived, is truly in the modern mode of expression.

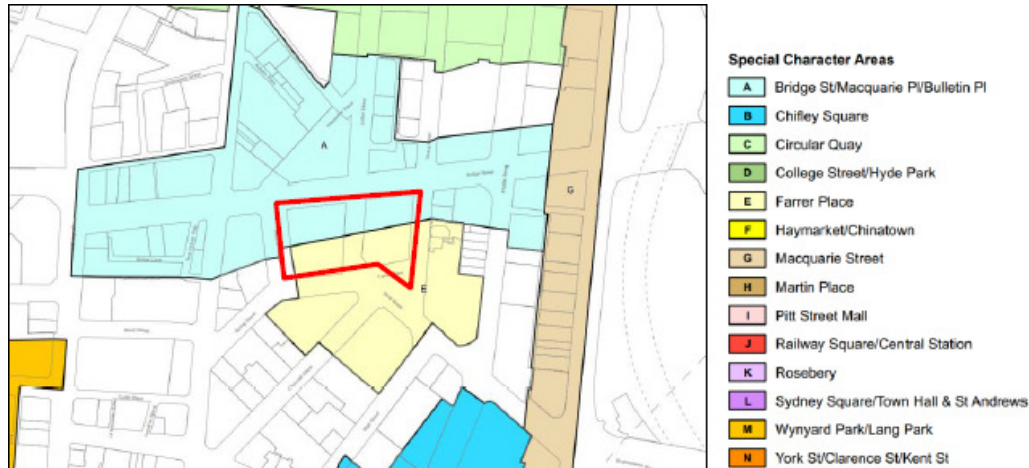
### **SLEP 2012 Item 2000, 36-42 Young Street**

Young Street Terraces are the only buildings that still remain in-situ, demonstrating the latter post-Government House phase of development on the First Government House site. They were part of the early development of this area which became the leading government administrative precinct later in the 19th century. Their relative simplicity contrasts with the more opulent public administrative buildings built at the end of the 19th century showing the change in attitude to public buildings. Together with the Philip Street Terraces, they represent an essentially residential form of building which is now rare in the Sydney CBD. The various adaptations made to the building have been minor and the intention of the residences is still obvious.

### 1.4.5 Special Character Areas within the Setting of the Buildings

The subject site sits within two special character precincts within Central Sydney. Specific development principles have been established to inform development and are listed below.

- Bridge Street/Macquarie Place/Bulletin Place Special Character Area
- Farrer Place Special Character Area



*Relationship between the Sandstone Precinct and the two Character Areas*

#### Bridge Street/Macquarie Place/Bulletin Place Special Character Area

The Bridge Street/Macquarie Place/Bulletin Place Special Character Area is described as follows:

*Bridge Street was the earliest east-west link across the Tank Stream between George and Macquarie Streets. It is significant for its association with a major colonial government building programme in the 1880's, which included the First Government House and Macquarie Place Reserve. Both the Reserve and Bridge Street represent the early planning of the colony with a street pattern that is reflective of the area's early topography.*

*The area retains evidence of its establishment by Governor Macquarie as the geographic and administrative centre of the colony, with the sandstone obelisk placed at the centre of Macquarie Place to mark the point from which all distances in the colony were measured.*

*A cohesive group of landmark sandstone buildings, some occupying whole blocks, define important public spaces and corners. Bridge Street offers an important vista to the Conservatorium of Music to the east and views to the water. Other views are distinguished by significant buildings within the area, especially those with special roof features.*

*The intact system of supporting lanes, some incorporated within building facades, is rare in the City and improves pedestrian permeability.*

## Character Management Principles

- (a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.
- (b) Recognise and enhance Bridge Street as one of Sydney's pre-eminent urban spaces and as the locality of heritage items which have housed activities of State and National significance.
- (c) Protect and extend morning sun access to Macquarie Place, Bridge Street and First Government House Place.
- (d) Conserve the existing significant laneways in the area and encourage active uses, where compatible with their significance.
- (e) Maintain and reinforce existing important public spaces, intersections and corners, in particular those crowned by significant buildings, such as the Lands Department and the Chief Secretary's Department Building.
- (f) Maintain and enhance existing views to the water, and also significant vistas to the Lands Department Building from Loftus Street, Macquarie Place and Bridge Street itself, in addition to the vista along Bridge Street to the Conservatorium of Music.
- (g) Maintain and reinforce the cohesive and rare streetscape character of Bridge Street and Macquarie Place by requiring new buildings to be built to the street alignment and with building heights that reinforce the existing predominant street frontage height.
- (h) Protect vistas that terminate at significant heritage buildings, including nineteenth and twentieth century public and commercial buildings.



The Lands Department Building is located directly across Bridge Street from Macquarie Place, while Education Department is located further east. (GBA)

## Farrer Place Special Character Area

Farrer Place Special Character Area is described as follows;

*Historical evidence shows that Farrer Place dates back as early as 1865 mainly being a street. Its original name was Fountain Street as known in 1871 and the name was changed in 1880 to Raphael Street, after the name of an alderman between the 1860s and 70s.*

*In 1935, the Minister for Agriculture requested that Raphael Street and the triangular plantation space fronting the building housing the Department of Agriculture which, at the time, occupied the southern wing of the Department of Education, be renamed as "Farrer Place". This was to commemorate William J. Farrer, a noted wheat breeder whose work had incalculable benefit to the wheat growing industry.*

*The closure of Young Street to traffic formalised the space and gave it the character of a plaza. The place was further enhanced by the development of Governor Macquarie Tower as a major public building, complementing the public and institutional character provided by the Departments of Lands and Education buildings to the west.*

*The area's location in the heart of the financial core of the city has resulted in large-scale high rise towers, interspersed with lower scale development, mostly with high quality design and elegant rooftops contributing to the skyline of the city. The limited height of the heritage buildings to the north and west allows solar access and provides some visual relief in this highly built up area.*

*The orientation of the place to the north allows for views to the water and the Harbour Bridge, while the clock tower of the Lands Department building to the west enhances the views from the place and adjoining streets.*



*The Education Department Building dominates Farrer Place, with the Lands Department further west down Bent Street (GBA)*

## Character Management Principles

- (a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.
- (b) Reinforce the urban character and sense of enclosure of Farrer Place by requiring new buildings to:
  - i. be built to the street alignment; and
  - ii. have adequate setbacks above the street alignment.
- (c) Restrain the building bulk and scale of new development, particularly to the east and south of the place.
- (d) Protect and extend winter sun access to the place, particularly during lunchtime.
- (e) Interpret the history of the place and its evolution in the design of new buildings and elements within the public domain and give it its own sense of place.
- (f) Improve, enhance and activate the public domain within the place.
- (g) Maintain and enhance existing views to Sydney Harbour and the Harbour Bridge to the north and vistas to the tower of the Lands Department building to the west.



*Farrer Place is an expansive public space in a highly crowded urban environment (GBA)*

## 1.5 Statement of Heritage Significance - Lands Department

### 1.5.1 Summary Statement of Heritage Significance

Extract from *The Lands Building, Conservation Management Plan*, Draft October 2014, prepared by Government Architect's Office

*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 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 both its external form and detailing and its interiors. 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 Barnett'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.*

## 1.6 Statement of Heritage Significance – Education Department

### 1.6.1 Summary Statement of Heritage Significance

Extract from *The Education Department Building, Conservation Management Plan*, Draft October 2014, prepared by City Plan Heritage

*The Department of Education building has been synonymous with the provision of universal public education in New South Wales since its construction in 1915 and is still used for its original purpose. The Department's association with the site dates from its establishment under the Public Instruction Act 1880. The southern half of the building, the former Department of Agriculture offices, demonstrates that Department's importance in the development of scientific agriculture and support for primary production when this was a major industry in the state in the first half of the 20th century.*

*The architectural style of the building, a restrained form of Federation Free Classical with plain facades highlighted by ornamentation at the entrances and upper floor entablature, is representative of contemporary tastes demonstrating external materiality and scale of the building in its original design by George McRae with Stage 2 (for the Department of Agriculture) being completed by a private firm, John Reid & Son.*

*The Department of Education building is a fine example of early 20th century government offices combining elements of their historic 19th century predecessors, with a concern for contemporary office design. Built in two stages 1912-15 and 1929-30, the building demonstrates rapidly changing methods in building construction of the early 20th century. The 1994-95 refurbishment by noted architect Ken Woolley provided a rational and elegant solution to the historic problems posed by key planning differences between the two stages of construction and resulted in efficient circulation and improved accommodation to contemporary standards.*

*Although the second stage of the building (1915 and 1930) was designed by a different architect using a different, more technologically advanced form of construction, the external architectural presentation of the two stages is remarkably unified or consistent. Occupying the whole of the city block bounded by Bridge Street, Loftus Street, Young Street and Farrer Place, the building is a key element in the built landscape of Bridge Street, in the surrounds of Macquarie Place and in Farrer Place to all of which it makes a notable contribution. It is part of an important group of late 19th and early 20th century government offices that represent the continuing association of this area with government and administrative activities since 1788. The site is part of a street plan that reflects the earliest development of the city of Sydney.*

*The Department's Art Gallery is unique in government offices and its student art collection, William Wilkins Memorial Art Collection, is the oldest in Australia.*

*The building is associated with key personalities in the history of education in New South Wales including Peter Board and Sir Harold Wyndham. It is also associated with Government Architect George McRae, who is considered as a key practitioner of the Federation Romanesque, Anglo-Dutch and Free Style in Sydney and whose work played a dominant role in the evolution and spread of Federation architecture throughout Australia.*

*The building has been the symbolic headquarters for generations of teachers and administration staff who have worked in the NSW education system since 1915.*

*The heritage significance of the Education Building is enhanced by the collection of movable heritage including furniture and war memorials. The movable heritage of the building has an ongoing and continuous association with the government function and demonstrates the building's association with public service. The collections of furniture and fixtures associated with public service and government administration demonstrate superior quality in local design, manufacturing and materials. The war memorials are of particular social significance for its commemoration of the role of Department of Education employees in war.*

## 1.7 Reference Material

### 1.7.1 Reference Material

The following reference material was consulted during the preparation of this Statement of Heritage Impact:

- *The Lands Building, Conservation Management Plan*, Draft October 2014, prepared by Government Architect's Office
- *The Education Department Building, Conservation Management Plan*, Draft October 2014, prepared by City Plan Heritage
- *Request for Secretary's Environmental Assessment Requirements*, prepared by Urbis Planning Consultants, and submitted to the Department of Planning in October 2014
- Architectural Volumetric Diagrams, prepared by Johnson Pilton Walker, Architects, (JPW) prepared as part of the Request for Secretary's Environmental Assessment Requirements.
- *Final Secretary's Environmental Assessment Requirements (SEARS) for Application SSD 6751*, issued in November 2014.
- Responses to the request for comment to the draft SEARS from NSW Department of the Environment and Sydney City Council, dated November 2014
- *Information Memorandum*, prepared on behalf of Government Property NSW, issued to interested parties as part of the international call for Expressions of Interest for the long term (99 years) lease of the "Sandstone Precinct", including the Lands Department and Education Department Buildings.
- Relevant Extracts from Sydney LEP 2012 and Sydney DCP 2012
- Relevant Extracts from the NSW Heritage Inventory for listed heritage items in the vicinity of the "Sandstone Precinct"
- Response the NSW Heritage Council, dated 4 November 2014, setting out a request for heritage related information in addition to the relevant requirements of the draft SEARS.

### 1.7.2 Context and Limitations

This Statement of Heritage Impact has been prepared in the context of the Stage One SSD 6751 SEARS and also responds to the Response from the Heritage Division regarding additional issues to be considered by the SHI in the context of the SEARS EIS. It has also been prepared in advance of the submission of any firm EOI bid conceptual re-use proposals, and more importantly in the context of any final preferred project proponent submission to GPNSW.

Accordingly, this Statement of Heritage Impact examines in conceptual terms the likely heritage impacts generated from the proposed re-use of the two major buildings and other components of the "Sandstone Precinct" in relation to the Draft Conservation Management Plans prepared for the two buildings.

At the time of writing, the Draft CMPs were under review for potential endorsement by the NSW Heritage Council. It is envisaged that the timetable for potential endorsement will be concurrent with the Heritage Council's review of this Statement of Heritage Impact.

## 1.8 Authorship

This Statement of Heritage Impact has been prepared by Graham Brooks, Director, Graham Brooks and Associates Pty Ltd, Heritage Consultants.

Graham holds a Bachelor of Architecture (Hons) from Sydney University (1972) and a Master of the Built Environment (Building Conservation) from UNSW (1974). He is a member of Australia ICOMOS, the Australian Institute of Architects, Royal Institute of British Architects and is a Registered Architect, NSW.

He was President of the ICOMOS International Cultural Tourism Committee from 2001 until 2011 and was the coordinating author of the *ICOMOS International Cultural Tourism Charter* (1999). On behalf of the UN World Tourism Organisation, he was the principal author of the *Handbook for Tourism Congestion Management at Natural and Cultural Heritage Sites* (2005) and the *Handbook on Communicating Heritage for the Tourism Sector* (2011).

Graham has been actively involved in formulating policy at an international level related to the management of tourism development and activity at heritage sites for more than 15 years. He has participated in the World Heritage Sustainable Tourism Program, as an adviser to the UNESCO World Heritage Centre. Over the last 40 years he has inspected well over 300 World Heritage Sites, a number on multiple occasions to monitor long term development issues. He has closely studied the relationships between the heritage and tourism sectors in the conservation, re-use and re-vitalisation for tourism and/or cultural purposes, of many types of heritage buildings and places, both in Australia and internationally. He is a member of the Senior Advisory Board of the Global Heritage Fund and has also consulted to the Getty Conservation Centre in Los Angeles.

He has been actively involved as a Heritage Consultant on projects throughout NSW and other regions in Australia for over 35 years, including projects in the United Kingdom, India and Indonesia.

Graham Brooks and Associates were recognised by the Australian Institute of Architects in 2013 with the Conservation Award for the conversion of the former Gowings and State Theatre Office building in Sydney to the QT Hotel. The firm is currently working with Greenland Australia on the adaptive re-use of the former Sydney Water Head Office (1939) to a major hotel. Both these projects involved buildings listed on the NSW State Heritage Register, as well as the Sydney LEP 2012 Heritage Schedule, and involved close and continuous consultation with both the NSW Heritage Division and Sydney City Council.

## 2.0 The Stage One SSD 6751 Proposal

### 2.1 Overview

The information contained in this Section has been drawn from the Request for Secretary's Environmental Assessment Requirements submission.

*GPNSW is seeking approval for a staged development application in accordance with Section 83B of the EP&A Act 1979. This Stage 1 development application will seek to secure approval for a concept proposal only with subsequent detailed proposals (and physical works) to be subject to subsequent development applications.*

*The Stage 1 DA seeks approval for a concept proposal for the use of the Sandstone Precinct for tourist and visitor accommodation, retail premises and a function centre and a building envelope defined by a maximum building height that will facilitate the adaptive re-use, extensions and alterations to the existing buildings.*

*The concept proposal the subject of the Stage 1 DA includes subterranean linkages between the two buildings (most likely underneath Loftus Street) as well as subterranean opportunities for the provision of hotel associated enabling services and support infrastructure including but not limited to back of house facilities, loading access and car parking that could be located under existing road reserves. Any future development beneath the road reserves will be subject to separate agreement with the City of Sydney as the relevant roads authority and landholder.*

With regard to the proposed Land Tenure:

*Both the Lands and Education Buildings will remain in freehold ownership of the NSW Government, with leasehold arrangements to be put in place for prospective development partners. Therefore, the applicant's preference to secure use approval as tourism and visitor accommodation is an important one that requires resolution at an early stage.*

### 2.2 Alternative Land Use

*In accordance with the NSW Government's objective to adaptively re-use the Sandstone Precinct to address the immediate hotel accommodation shortage in Sydney, the applicant is seeking to secure approval for the use of both the Lands and Education Building as **'tourism and visitor accommodation'** as defined in SLEP 2012 below:*

***tourist and visitor accommodation*** means a building or place that provides temporary or short-term accommodation on a commercial basis, and includes any of the following:

- (a) backpackers' accommodation,*
  - (b) bed and breakfast accommodation,*
  - (c) farm stay accommodation,*
  - (d) hotel or motel accommodation,*
  - (e) serviced apartments,*
- but does not include:*
- (f) camping grounds, or*
  - (g) caravan parks, or*
  - (h) eco-tourist facilities.*

*It is the proponent's express intention to utilise the buildings predominantly for hotel or motel accommodation which is defined as follows:*

**hotel or motel accommodation** means a building or place (whether or not licensed premises under the Liquor Act 2007) that provides temporary or short-term accommodation on a commercial basis and that:

- (a) comprises rooms or self-contained suites, and
- (b) may provide meals to guests or the general public and facilities for the parking of guests' vehicles, but does not include backpackers' accommodation, a boarding house, bed and breakfast accommodation or farm stay accommodation.

It is also proposed that the following ancillary uses will have the potential for inclusion as part of the proposed use being:

- **Serviced apartments** (but only as a minor proportion to the overall hotel use)
- **Retail Premises** (to allow for ancillary shops, food and drink premises including cafes and restaurants and roof top bars and the like) all of which would support the proposed hotel function.
- **Function Centre** (to support the opportunity if available to hold events, conferences and the like)
- **Other** – (Gym, spa and other ancillary uses relating to the hotel functionality)

## 2.3 Floor Space

A maximum floor area for the development has not been established at this time and will be determined based on the approved building envelope for the site, including any subterranean floor space established. The total GFA of the site will be within the maximum permitted under the SLEP 2012 of 14:1.

## 2.4 Lands Department Building

The Lands Building has a highly complex roofscape, incorporating towers, domes and other features. As a consequence, it is not proposed to establish a specific building envelope above this particular building. Nevertheless, it is proposed to explore opportunities for new building works to enhance the use of the roofscape for uses such as roof top bars, restaurants, urban garden spaces, meeting rooms and high end space.

It is proposed to establish a subterranean building envelope to accommodate the potential for additional floor space for this building that may include hotel associated services, back of house activities, and car parking, and loading docks.

## 2.5 Education Department Building

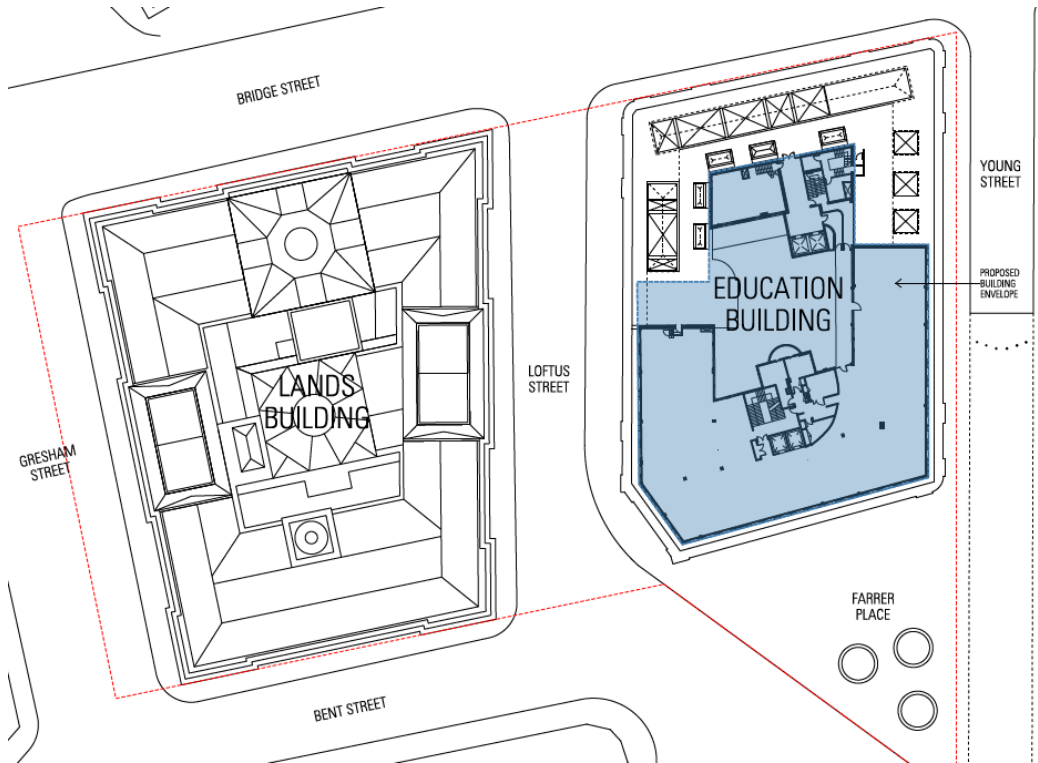
It is also proposed to establish a subterranean envelope for potential linkages including back of house services, access, car parking and loading.

## 2.6 Expansion of the Building Envelope

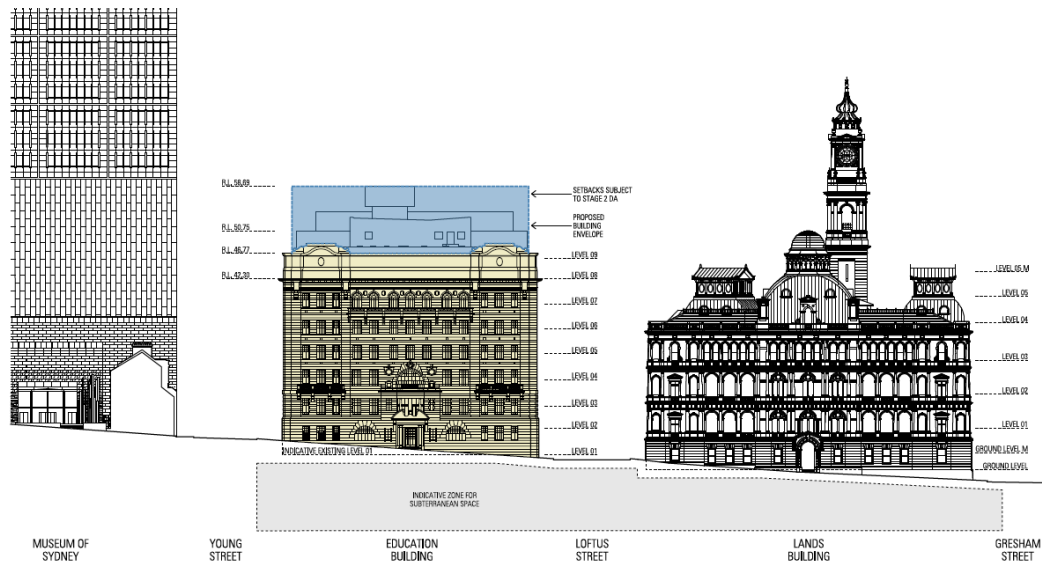
The building envelope proposed for the site seeks to optimise the development potential having regard to existing constraints in terms of heritage and planning controls.

The Lands Building has a highly complex roofscape, incorporating towers, domes and other features. As a consequence, it is not proposed to establish a specific building envelope above this particular building.

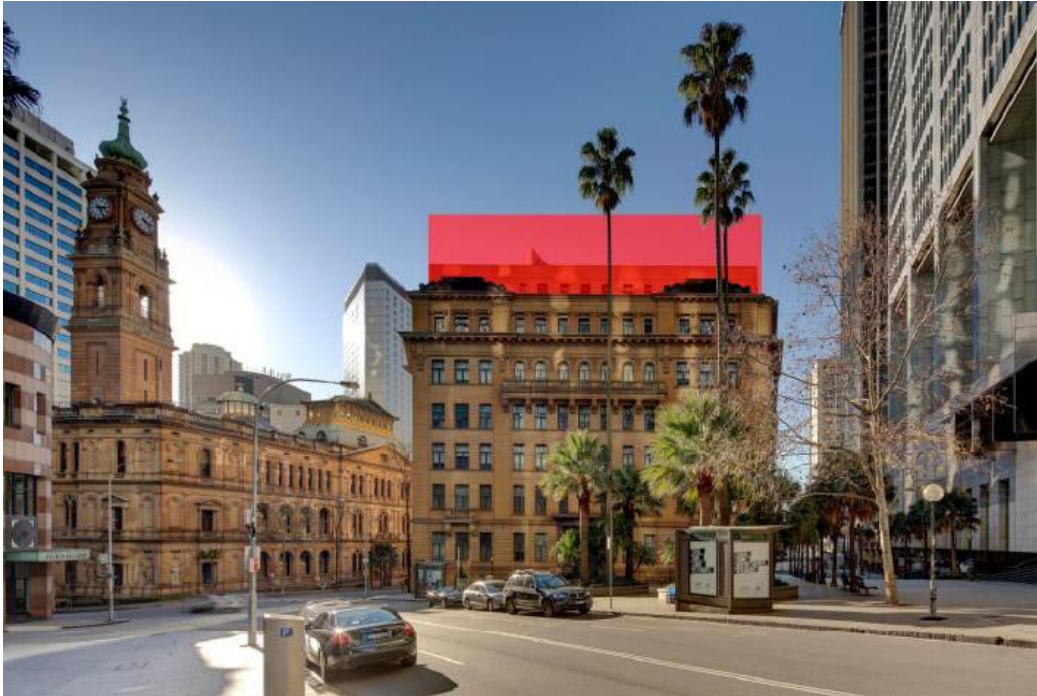
The proposed development concepts has established the opportunity for a building envelope for the Education Building that extends approximately 3 levels above the existing parapet to a height that is consistent with the top of the existing lift motor room.



Potential location and extent of the additional upper building volume to be located on the Education Department Building (JPW Architects)



Bridge Street elevation of the two buildings and the adjoining buildings to the east, illustrating the relative height of the potential upper level building volume above the Education Department Building (JPW Architects)



*Indicative streetscape view of the potential upper level building volume above the Education Department Building, when viewed from the south (JPW Architects)*

## 2.7 Subterranean Public Domain Potential

*In order to facilitate the proposed adaptive re-use of the Lands and Education Buildings, the proponent is seeking to explore opportunities within the public domain to provide:*

- *Pedestrian connection between the two buildings under Loftus Street;*
- *The use of the sub terrain below Farrer Place for potential hotel related facilities including back of house facilities, loading dock and potential car parking.*

*The ability to create a pedestrian connection between the two buildings is considered to be a critical success factor in the proposed adaptive re-use of the buildings for hotel use. Similarly, the potential for services and back of house of facilities to be isolated from the significant heritage fabric is also seen as fundamental to the preservation of the intrinsic significance of the heritage items.*

*Early discussions have commenced with the City of Sydney to explore the opportunities to create such opportunities, noting that final details associated with the creation of substratum spaces and the like would be a matter for further resolution with key stakeholders at the detailed DA stage.*

## 3.0 Assessment of Heritage Impact

### 3.1 Strategic Heritage Assessment of SSD 6751 Proposal

This strategic heritage assessment of the SSD 6751 proposal is structured to examine the individual components of the proposal as outlined in the Request for SEARS submitted in October 2014. It also responds in general terms to the issues contained in Section 4 of the final SEARS issued by the Department of Planning. The discussion in section 5.4 of the CMP for the Lands Department Building recognised the reality of the current context of the building and examined issues surrounding a number of re-use options:

*In the case of the Lands Building the ability of the place to demonstrate its historic purpose-built use as an administration building for government land management (through the integrity of its fabric and layout) is a key aspect of its heritage significance (see Part 4 of this CMP for further information about significance). Because of this outstanding heritage value, it would be preferable that the Lands Building continues to be used for government administrative uses. However it is recognised that any future use for the Lands Building (including a continuation of administrative uses) may require substantial change to the spatial qualities and fabric of the building and an upgrade of services in order to meet contemporary requirements for safety, security, environmental control and flexibility; and also to ensure conservation of key heritage elements.*

*Where this administrative use of the place is no longer feasible any proposed new use for the Lands Building should be compatible with the conservation of its heritage values. Because of the integrity of its exterior design, interior layout and external and internal finishes, it should be recognised that the Lands Building has a lower tolerance for change than other heritage assets of its type. This does not mean adaptation is not feasible, rather that it requires more careful consideration.*

*Use of the building by the private sector for office accommodation (e.g. international consular facilities) or educational purposes should not be discounted. Commercial retail and/or restaurant uses across the whole building are a poor match in terms of functionality and the required subdivision and servicing would place undue pressure on the significant spatial qualities and fabric of the building.*

*Cultural uses such as an art gallery (whether public or private) also remain as an option, although the precinct is already well served with cultural facilities including Customs House and the Sydney Living Museum properties.*

*The inflexibility of the Lands Building and the small size of the commercial market for many alternative uses is noted. It is important that any alternative future use provides for the economic sustainability of the asset into the future including ongoing maintenance and repair.*

*Currently there is very limited opportunity for the wider community to appreciate the heritage interiors of the Lands Building. Uses which enable a wider appreciation of the significant interiors of the building should be favourably considered.*

*Following an expert consultant team's consideration of the future of both the Lands Building and the Education Building, the State Government determined in late 2013 that both buildings were unsuitable for contemporary government administrative purposes and that tourism and ancillary uses (in particular hotel accommodation) should be considered to ensure their viable future. The analysis included consideration of both the Lands and Education Buildings being managed by a single entity to achieve the required returns, diversity of facilities and flexibility (given the greater capacity for changes to the interior spaces of the Education Building due to previous interventions).*

This situation is similar for the Education Department Building

### 3.1.1 Alternative Land Use and Tenure

In the context of the SSD 6751 Proposal, it is the general intention of GPNSW to introduce tourism related uses into the two historic buildings under the umbrella of a long term (99 year) leasehold arrangement with the State Government, which will retain the freehold title and ultimate responsibility for the building.

The two buildings were purpose built to accommodate the public administration functions of three state government departments; Lands, Education and Agriculture. Over the intervening decades there have been some changes in the departments who have occupied the buildings, whereby the Lands Department building is now largely occupied by the Department of Planning and the Education Department Building by Education. In addition, numerous upgrades have taken place in the nature of the generally internal accommodation, fixtures, equipment and furniture provided for the operational functioning of those departments. However, in essence, the buildings have remained as commercial facilities accommodating major State Government administrative departments.

The proposed change of use is taking place in accordance with Government policy and the relocation of the current occupants to other premises is underway. As such, the change of use from commercial office premises associated with Government Administration to tourism related uses will have an impact on the continuity of that aspect of their heritage significance related to their traditional use. It will not have an impact on the continuity of that aspect of their significance as demonstrated over the period between when they were first occupied and 2014.

#### Strategic Heritage Council Concerns

Consideration of any potential re-use for the two buildings must take account of the concerns expressed by the NSW Heritage Council regarding adverse impacts on the heritage significance of the buildings arising from the loss of their historic uses.

The loss of significance due to the removal of their historic use is already a fact to some extent and is the result of government policy. Any loss of significance arising primarily from a change of use is, to some extent an esoteric issue that has affected virtually every non-residential building in Australia since the 1990s. Such changes of use are typically driven by big evolutionary, technological, organisational, property management and economic forces in 21<sup>st</sup> century society.

A common mitigation strategy will be the introduction of some form of interpretation within the particular building. Interpretation strategies will eventually be included in any development consent as a matter of common practice. It can be asserted that a change of use to hotel provides higher quality and more publicly accessible opportunities for interpretation than may be possible with some alternative uses. This can also be claimed for cultural buildings, but is unlikely to be the case for a wider audience if the buildings are re-used for school or commercial purposes due to security of access restrictions.

Consideration of any potential re-use for the two buildings must also take account of the concerns expressed by the NSW Heritage Council with regard to the physical impact on the heritage fabric of the buildings arising from substantial interventions that would be generated by compliance requirements of the National Construction Code.

A proposed change of use must be dealt with by means of a Development Application, which switches on the need for a full analysis and appropriate upgrade to BCA compliance or its "deemed to satisfy" provisions, under the National Construction Code. Such an outcome will be required for any change of use. Even if the buildings remained in their current use, they would need to be progressively updated to contemporary building code requirements, as has been the case with periodic upgrades in the past.

Designing and implementing code upgrades in an historic building are always demanding if alterations to historic fabric and spaces are to be avoided or minimised. Recourse to

alternative compliance approaches, deemed to satisfy provisions, fire engineered outcomes and careful repair are typical processes that must be explored and eventually implemented. The HC resolution implies that there will be a diminution in the integrity and heritage significance of the buildings. This is inevitable to some extent with all building upgrades and is a typical component of projects approved under s60 of the NSW Heritage Act.

It will be essential for the future applicant to demonstrate that the upgrades can be undertaken with the least possible impacts to integrity, fabric or spaces.

In accordance with sound conservation practice, the impact arising from this proposed change of use needs to be assessed in the context of potential alternatives, which may result in a lesser degree of impact on the heritage significance of the two buildings.

### **Option 1: Continuation of Government administrative occupancy**

The nature, scale and operational issues associated with the existing commercial accommodation within the building are such that, in fundamental terms, they could continue to be occupied and used by State Government administrative departments. Continuation of the existing or related occupation would achieve the lowest possible impact on this aspect of the heritage significance of the two historic buildings. This is particularly so if those departments were Lands and Education for which the buildings were designed and which were the longest or only occupants.

Continuing use does potentially pose a number a number of short or long term threats to this aspect of heritage significance. The nature of contemporary commercial use by large organisations typically requires large, open or flexible floor plans, high quality occupant amenity in terms of air-conditioning and lighting, increasing levels of technological support and competitively priced rental. There is the potential for these demands to eventually place significant strains on the building in terms of upgrading the physical fabric and services installations to meet contemporary requirements and standards. Such upgrades may negatively impact on other aspects of the heritage significance of the buildings.

Postponing or delaying a change of use does not necessarily mean that it will not reappear at some future time. In a dynamic city such as Sydney, there is a continuing supply of alternative accommodation that is available for consideration by public sector property managers. Continuing occupation by either the most recent occupants or other departments is subject to the technical, financial and policy objectives, including the Decade of Decentralisation<sup>100</sup> Policy and requirements of the State Government within the management of its overall property portfolio. In this context, the decision has been taken at the highest levels of Government to relocate the current users to other premises and not to relocate other administrative departments from their current accommodation into the subject buildings.

Accordingly, the option of retaining the current or alternative state government administrative department occupants no longer exists.

### **Option 2: Re-use for Inner City School**

There has been some public interest in the potential to adaptively re-use the Education Department Building as an Inner City High School. These suggestions do not appear to extend to the Lands Department Building, leaving the future of this building potentially unresolved as a stand alone property asset.

Adaptive re-use for a high school is likely to generate substantial intervention into the fabric and spaces of the building, and generate demand for a variety of new facilities to cater for a relatively large number of students. No formal user brief has been sighted at this stage and no capacity study has been undertaken as to whether the building is large enough to cater for the use. The concept has some merit in that the upper floor galleries could remain in their current use as exhibition or specialised teaching spaces.

There is some case to be made that a High School would provide some continuity of the connection with education, albeit through a different strand to that of Public Education Administration.

While any re-use, including tourism accommodation/hotel re-use, school use etc, is likely to generate a reasonably extensive physical intervention in the Education Department building, the High School option may require a similar degree of intervention to a hotel re-use in order to create the required range of teaching spaces, circulation, recreation facilities, administration and staff accommodation.

A significant issue for the option of an Inner City High School is the source of funds to cover the cost of land purchase/lease. If it were to be a publicly owned and operated High School, the Government would need a policy decision to undertake the project and forego the currently scheduled financial return from the sale of a long term lease. If it were to be a privately operated High School, the cost of the lease over the site would need to be factored into the feasibility.

### **Option 3: Occupation by other commercial office users**

The option for occupation by other commercial office users may minimise but not entirely negate an adverse impact on that aspect of heritage significance related to continuing occupation by state government administrative departments.

The Request for SEARS submission summarised the Gross Floor Area of the two buildings as approximately 10,076 sq metres for the Lands Department Building and 13,410 sq metres for the Education Department Building. The buildings therefore contain substantial quantities of available commercial space, although much of it is located within relatively small internal parcels that are divided by solid walls, dramatically scaled corridors and long narrow floor plates. It is these configurations that have made it difficult, if not impossible for even the long term or current occupiers of the buildings to achieve or maintain contemporary space standards and communication linkages across different parcels of floor space.

The nature and configuration of the two buildings mitigates, in each case, against their attractiveness to large firms in the commercial market place, particularly those who require intensive technical services support.

The nature and configuration of the two buildings suggests that the most likely alternative commercial office users might comprise relatively small to medium scaled organisations, possibly in a series of "boutique" or serviced office configurations. Occupation by multiple tenancies generates issues related to individually controllable air-conditioning or climate control, privacy, identity, signage, shared facilities and coordinated servicing.

While not unique to this use option, the practical and effective resolution of these issues is likely to generate similar physical impacts on the building fabric to other uses, while not maintaining the essential aspects of heritage significance related to the current, traditional occupancy.

### **Option 4: Residential Conversion**

In recent decades many previously commercial properties in Central Sydney have been converted to residential use, or replaced with purpose designed residential buildings. This trend shows every reason to continue unabated into the foreseeable future. Conversion to residential has been undertaken in a number of historic warehouses, where the open floor plates provides an initial level of considerable flexibility in setting out new dwelling units on typical floor plates.

Conversion to multiple residential dwellings, even those which are generously sized, will generate requirements for intense spatial subdivision and intensive, extensively distributed servicing for facilities such as bathrooms, kitchens, and spas. The demand for the range and scale of the common areas common for hotel uses is not typically met by residential re-use.

Conversion to a multi-dwelling residential land use will have an equal impact on the aspect of heritage significance of the buildings as does tourism related uses, while potentially generating a considerably higher spatial and physical impact on the building fabric.

While such an option is more potentially achievable in the Education Department Building than in the Lands Department, the market requirement for strata title occupation tends to work against the fundamental aspect of SSD 6751 for a long term lease over the entire Sandstone Precinct.

In the modern world, there is a potential for one individual residential owner to purchase and occupy one, but probably not both buildings as a private residence. Such an option eventuated with the former Church of Christ Scientist in Liverpool Street Darlinghurst. The spatial and physical implications of such a use in so large a building as the Lands Department are not quantifiable at this stage. While not unique to a single or multiple residential conversion option, the practical and effective resolution of these issues is likely to generate similar physical impacts on the building fabric to other uses, while not maintaining the essential aspects of heritage significance related to the current, traditional occupancy.

### **Option 5: Cultural Institution Re-use**

Consideration of opportunities for the adaptive re-use of any redundant historic buildings for cultural purposes is a necessary component of any heritage impact assessment.

Potential cultural re-use opportunities are generally those associated with the visual or performing arts. They typically include storage, education, administration and display or performance spaces, staff and public facilities, delivery and disposal capacity and to some extent workshop or production potential. The most successful recent examples of such outcomes in Sydney include Pier 4 Walsh Bay, the *Carriageworks* at Eveleigh, Museum of Modern Art at Circular Quay and a number of smaller scale projects.

Intervention to achieve functional and successful re-use can and typically does involve extensive physical intervention to create the new facilities. These can and are often carefully integrated into the existing or remnant architectural character of the building such as with the recently re-opened 1980s conversion of the former Hotel Sale in Paris for the Musee Picasso.

Inevitably the creation of a new cultural identity for an historic building can overwhelm and have an impact on the continuity of any former or traditional associations with former occupants. The Lands and Education Buildings also require very high levels of continuing conservation and maintenance, imposing a significant burden on the public purse.

A major threat to the long term continuity and protection of heritage significance for historic buildings converted to cultural institutions is ensuring and/or generating the continuity of sufficient financial resources to maintain the energy of the place. Unfortunately, cultural institutions world wide are vulnerable to fluctuating levels of public and governmental support that can and has threatened the sustenance of cultural places and their significance.

An idea has been suggested by some members of the public for the introduction of an intimate theatre/concert venue to the courtyard space within the Education Department Building. The exploratory architectural sketches made public to support this suggestion imply considerable intervention into the historic fabric and potentially the street facades in certain places for the installation of large scale loading facilities to suit the theatrical use and large public circulation spaces in the related foyers.

## **Option 6: Tourism Related Uses**

Tourism uses are likely to generate a range of size, spatial, servicing and character requirements that can be successfully accommodated in various locations within the complex physical layouts and arrangements of the two buildings, subject to strong compliance with the CMP policies and guidelines.

A further advantage envisioned by SSD 6751 is that the two buildings provide an overall opportunity for spreading the totality of tourism related facilities and requirements across the two buildings, in accordance with their individual capacity to absorb change while minimising and mitigating any adverse impacts on heritage significance.

The range of conservation policies and guidelines contained in the CMPs, and subject to their future oversight by both City Council and the NSW Heritage Council, has the potential to be successfully and responsibly achieved through the installation of tourism uses into the Lands and Education Department Buildings.

There will be a loss of that aspect of significance related to their current, traditional use and occupancy by state government administrative departments. However the foregoing analysis indicates that any change of use will effectively have the same degree of impact on that aspect of heritage significance of each of the two historic buildings related to the current, traditional occupancy by large scale state government administrative departments. There will be no adverse impacts arising from the change of land use of the "Sandstone Precinct" on the character or significance of the listed heritage items in the vicinity, nor on the significance of the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.

Overall, the potential for the SSD 6751 proposal to mobilise extensive financial resources and their commitment to the retention, conservation and sensitive adaptive re-use for tourism related purposes is highly likely to have a very positive outcome on the long term continuity and evolution of the heritage significance, architectural character and public accessibility of these two fine and distinctive heritage buildings and their surrounding public domain.

### **3.1.2 Floor Space**

There is no proposal with SSD 6751 for any increase in above ground floor space or external volume of the Lands Department Building. Exclusion of any increase in the floor space or external volume from SSD 6751 means that the future adaption of the building for the proposed tourism related uses will be undertaken only within the current, distinctive and highly valued architectural character of the building, other than any new subterranean areas.

Thus there will be no impact on the heritage significance of the Lands Department Building arising from the current proposal.

The proposed potential increase in above ground floor space for the Education Department Building is discussed in Section 3.1.5 below. This assessment concludes that while there will be some visual impact on the overall architectural composition and urban presence of the Education Department Building these impacts are within acceptable limits in heritage terms.

The relatively limited scale of the proposed upper level additions compared with the scale and powerful urban presence of the existing building means that there will be no adverse impacts on the character or significance of the listed heritage items in the vicinity, including the Lands Department Building, nor on the significance of the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.

### **3.1.3 Lands Department Building**

The assessment potential impacts on the heritage significance of the Lands Department Building are too complex to be undertaken in this section of the SHI report. See the assessment in Section 3.2 below

### **3.1.4 Education Department Building**

The assessment potential impacts on the heritage significance of the Education Department Building are too complex to be undertaken in this section of the SHI report. See the assessment in Section 3.3 below

### **3.1.5 Expansion of the Building Envelope**

SSD 6751 contains no proposal for an increase in the floor space or external volume of the Lands Department Building, other than subterranean areas. Thus there will be no impact on the heritage significance of the Lands Department Building arising from the current proposal.

The proposed potential increase in floor space for the Education Department Building comprises the addition of several floor levels over part of the building footprint, as illustrated on the JPW drawings, to a maximum height equivalent to the relatively modern lift overrun. This option includes the removal and replacement of the eighth floor level that was a last minute addition within the 1930s second, southern stage of the building when additional accommodation was required beyond that provided by the matching volume to the initial, northern stage. The current eighth floor of the existing building, with its restrained architectural presentation, is rated as making a lesser contribution to the significance and architectural character of the Education Department Building than the main seven storey components behind the fine sandstone facades. Any subterranean areas will have no impact.

The final architectural or spatial adoption of the potential additional space proposed within SSD 6751 will be the choice of the preferred proponent and will be designed illustrated in preparation of their Stage Two submission. Accordingly, the current assessment must be confined to judging the impact of the potential additional volume and not any particular architectural expression or materiality.

The addition of new architectural components to the upper levels of historic buildings has become over recent years a relatively mainstream approach to enhance the economic capacity of a particular building to sustain its architectural and heritage significance into the long term. The acceptability of such an approach is generally governed by a number of criteria:

- Will the volume of the upper level addition be subservient to the existing volume of the historic building?
- Will the upper level volume be readily distinguishable from the existing volume and architectural expression of the historic building?
- Will the upper level volume be set back from the outer face of the main historic façade by a sufficient dimension to achieve the objectives of distinguishing it from the main building?
- Will the extent of the upper level addition be restricted from extending over the majority of the existing floor plate of the building, in addition to the preferred setbacks from the facades?
- Will any notable roof level features or architectural detailing of the historic building be retained, protected and respected by limitations placed on the extent of the allowable footprint of the proposed upper level?

An analysis of the proposed upper level volume reveals that it has been located, scaled and designed to meet the objectives of all these criteria. The 3D views of the proposed upper level addition from various ground level, public domain viewpoints within nearby streetscapes provides the necessary visual evidence of this outcome.

The relatively limited scale of the proposed upper level additions compared with the scale and powerful urban presence of the existing building means that there will be no adverse impacts on the character or significance of the listed heritage items in the vicinity, including the Lands Department Building, nor on the significance of the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.

### **3.1.6 Subterranean Public Domain Potential**

The potential for the Lands and Education Department Buildings to be adapted for tourism related purposes in a combined and integrated manner, has led to the inclusion in SSD 6751 of the potential for an underground connection below street level to link pedestrian movement and servicing activities to each building with no impact on their fine and distinctive architectural facades.

The application recognises that this idea is only at the potential stage and is subject to the preferences of the eventual preferred project proponent and the consent from a range of state and local agencies and stakeholders.

The concept of underground connectivity to avoid disruption of grand architectural buildings and spaces was first trialled in a major way in the final decades of the 20<sup>th</sup> century with the Louvre forecourt in Paris. Not only were major visitor facilities provided to cater for the millions of current visitors to the museum, a grand new entry to the Louvre was created in the form of a series of glass pyramids in the central forecourt of this vast historic complex. The result, an outcome of a large underground project completed over more than 10 years, has received universal acceptance from public agencies, specialist heritage practitioners and the general public. A second major example is the recently completed



*The Louvre Forecourt has successfully contributed to the transformation of the former historic palace and administrative complex. (GBA)*



*The Louvre has an expansive underground visitor reception area below the main plaza (GBA)*

A second major example of a subterranean connection is during the recent major conservation and revitalisation of the Rijksmuseum in Amsterdam. The functionality of this major public cultural institution had long suffered from the original design that spanned the building across a public roadway. Despite years of negotiations with City officials attempts to close the road and absorb the space into the museum foyers proved unsuccessful. As a result a new underground connection was constructed to link the two ground level entries to the building and provide expansive new visitor reception and circulation facilities for the museum. This project has also received universal acclaim.



*The public road that runs directly through the original Rijksmuseum remained open after the recent major renovation project and now spans the public foyer below. (GBA)*



*The main foyers of the Rijksmuseum are connected by the expansive underground passage, constructed below the road way, which accommodates ticket office and visitor amenities. (GBA)*

There is potential for the excavation and construction of future subterranean connections to disturb archaeological relics and foundation material of each building and relics below the public domain. Subject to the design and development intent of the eventually selected project proponent, and consent from a variety of agencies and stakeholders, any such potential impacts can and will be managed in the final project through the preparation of a detailed Archaeological Assessment and award of a future Excavation Permit for the works. Any potential structural instability can and will be managed and minimised through detailed structural design and the preparation of detailed structural methodologies.

Accordingly, there will be no unacceptable adverse impacts on the heritage significance of the subject buildings and no adverse heritage impacts on any heritage item in the vicinity nor on the Special Character Area, arising directly from SSD 6751.

Subject to the final design, there may or may not be any above ground structure associated with a future subterranean link between the two buildings. The visual and potential heritage impact on the affected streetscape curtilage of the two buildings can be assessed in the appropriate as part of a future Stage Two application.

### **3.1.7 Potential Impact on Heritage Items in the Vicinity**

There will be no physical or visual impact on any of the heritage items in the vicinity of the two historic buildings arising from the proposed tourism related uses for the Lands and Education Department Buildings.

Accordingly there will be no adverse or any other impacts on the heritage significance of nearby heritage items.

### **3.1.8 Potential Impact on the Special Character Area**

Sydney DCP 2012 requires that any proposed works affecting the public realm in the vicinity of the Lands and Education Department Buildings should address the objectives and provisions of Section 5 for the two Specific Areas.

With regards to the principles for the Bridge Street/Macquarie Place/Bulletin Place Special Character Area:

*(a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.*

*(b) Recognise and enhance Bridge Street as one of Sydney's pre - eminent urban spaces and as the locality of heritage items which have housed activities of State and National significance.*

*(c) Protect and extend morning sun access to Macquarie Place, Bridge Street and First Government House Place.*

*(d) Conserve the existing significant laneways in the area and encourage active uses, where compatible with their significance.*

*(e) Maintain and reinforce existing important public spaces, intersections and corners, in particular those crowned by significant buildings, such as the Lands Department and the Chief Secretary's Building.*

*(f) Maintain and enhance existing views to the water, and also significant vistas to the Lands Building from Loftus Street, Macquarie Place and Bridge Street itself, in addition to the vista along Bridge Street to the Conservatorium of Music.*

There will be no physical or visual impact on Bridge Street/Macquarie Place/Bulletin Place Special Character Area arising from the proposed tourism related uses for the Lands and Education Department Buildings. Accordingly there will be no adverse or any other impacts on the heritage significance of that Special Character Area.

With regards to the principles for the Farrer Place Special Character Area:

- (a) *Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.*
- (b) *Reinforce the urban character and sense of enclosure of Farrer Place by requiring new buildings to:*
  - i. *be built to the street alignment; and*
  - ii. *have adequate setbacks above the street alignment.*
- (c) *Restrain the building bulk and scale of new development, particularly to the east and south of the place.*
- (d) *Protect and extend winter sun access to the place, particularly during lunchtime.*
- (e) *Interpret the history of the place and its evolution in the design of new buildings and elements within the public domain and give it its own sense of place.*
- (f) *Improve, enhance and activate the public domain within the place.*
- (g) *Maintain and enhance existing views to Sydney Harbour and the Harbour Bridge to the north and vistas to the tower of the Lands Department building to the west.*

There will be no physical or visual impact on Bridge Street/Macquarie Place/Bulletin Place Special Character Area arising from the proposed tourism related uses for the Lands and Education Department Buildings. Accordingly there will be no adverse or any other impacts on the heritage significance of that Special Character Area.

### 3.1.9 Impacts on the Visual Character of the Area



PICTURE 1 – EXISTING



PICTURE 2 – PROPOSED



PICTURE 3 – EXISTING



PICTURE 4 – PROPOSED

*Extracts from the EIS document confirming that when viewed from the major areas in the surrounding public domain to the north of the Sandstone Precinct, the proposed development will have virtually no impact on the visual character or historic associations with the locality.*

### 3.1.10 Impacts of Changes to the Public Domain



PICTURE 5 – EXISTING



PICTURE 6 – PROPOSED



PICTURE 7 – EXISTING



PICTURE 8 – PROPOSED

*Extracts from the EIS document confirming that when viewed from the major areas in the surrounding public domain to the south and south west of the Sandstone Precinct, the proposed development will have virtually no impact on the visual character or historic associations with the locality.*

As noted in the SSD 6751 EIS report, JPW Architects have prepared indicative architectural plans illustrating the conceptual built form, as well as a view impact analysis. This work facilitates the evaluation of the proposed vertical expansion of the building envelope above the Education Department Building. Thus the SSD application has the following aspects of relevance to visual impacts and impacts on the surrounding public domain.

- The building height, architectural character and complex roofscape, including the prominent corner tower and main dome, remain unchanged will not generate any additional visual or spatial impacts.
- The vertical expansion of the Education Department Building is limited in height to the existing highest point of the building and is set well back from the main facades. This new massing has been located, scaled and conceptually designed to be visually and architecturally subservient to the urban expression and distinctive composition of the existing building.
- The vertical addition responds positively to the character and heritage significance of the existing Education Department Building. As such it will have no adverse impacts on the surrounding public domain or any heritage items in the vicinity, including the nearby Lands Department Building.
- There are several, relatively distant viewpoints within the surrounding streets and public domain where the proposed vertical addition will be visible. Given the generous proposed setback from the Bridge Street alignment, there will be very limited visibility from within Bridge Street. Views to the building from Bent, Spring and O'Connell Streets will be greater but these views will not adversely impact on the public domain, given the dramatic height and scale of surrounding modern buildings.

### **3.1.11 Conclusions on Strategic Heritage Impact Issues**

The proposed tourism related re-use of the two major historic buildings and the "Sandstone Precinct" as a whole, and proposed additional floor space volume on the upper levels of the Education Department Building, contained in SSD 6751, will have some adverse impacts on the heritage significance of the place. Nevertheless, in general, the proposed development accords with the intent and objectives of the relevant and strategic conservation policies contained in the Conservation Management Plans for the two iconic historic buildings.

In fact there is an excellent potential for positive to very positive impacts on the sustainability and evolutionary potential of their heritage significance:

The NSW Government will retain ownership of the land and the buildings, within the context of a 99 year lease for the of the relevant property parcels within the Precinct.

Of the various alternative land uses examined in the options analysis, only the options of cultural centre and tourism use would generate significant increases in public access into and within the buildings. Such access is not readily available in their current use as centres of government administration.

The retention, continuity and evolution of the heritage significance of the place will be carefully managed through the relevant provisions of the ground lease. These provisions will be grounded in the policies and guidelines of the two CMPs prepared for the historic buildings and by any relevant terms of approval issued by the NSW Heritage Council and conditions of consent issued by Sydney City Council or the Department of Planning for a future Stage Two project application.

Overall, there is a strong potential for the project envisioned in the SSD 6751 proposal to mobilise extensive private sector financial resources and for their application to the retention, conservation and sensitive adaptive re-use for tourism related purposes of the Lands and Education Department Buildings. This is highly likely to have a very positive outcome on the long term continuity and evolution of the heritage significance, architectural character and enhanced public accessibility of these two fine and distinctive heritage buildings and their surrounding public domain.

There is little or no risk of any adverse impacts on the heritage significance of any listed heritage item in the vicinity of the project or on the Bridge Street/Macquarie Place/Bulletin Place and Farrer Place Special Character Areas. In fact the additional pedestrian activation of the surrounding streets that is often generated by high quality tourism hotels will result in a positive outcome for this public domain.

In terms of the heritage provisions of Sydney LEP 2012 and Sydney DCP 2012, and in accordance with good national and international conservation practice as guided by the two CMPs, there is no doubt that the SSD 6751 proposal does respond to and respect the significance of the buildings and the context.

## 3.2 Additional Assessment Requested by Heritage Division

The additional assessment information requested by the NSW Heritage Division sought some specific consideration of the likely implications and impacts of the adaptive re-use of the Lands and Education Department Buildings for tourism purposes.

As noted in Section 1.7.2 above, the SSD 6751 project addresses only strategic concepts and issues of re-use for tourism purposes. This assessment is being conducted simultaneously with the preparation by a range of interested parties of EOI responses in accordance with the call for Expressions of Interest. It can be expected that each interested party will take their own view on how they would adaptively re-use the two buildings for tourism purposes, and the details of each are likely to be quite varied. Only at the final submission of a Stage Two Application for Development Approval by the preferred proponent will the detail of a specific proposal emerge for close scrutiny. It is at this subsequent stage that the Heritage Council will have the opportunity to undertake a full and detailed review of the issues raised in the questions below as they relate to the submitted scheme.

Accordingly, and in the absence of any detailed proposal on which to base the assessment requested by the Heritage Division, the following assessment has been undertaken at a strategic level to highlight some of the issues and opportunities that will be more closely examined as part of a later submission. Where consideration of these issues has already been given in this SHI report, reference will be made to that consideration to minimise repetition.

The most important consideration of this assessment is that while some impacts on the building fabric or internal spaces may be unavoidable, the proposed long term project offers an undeniable opportunity for the heritage significance of the Lands and Education Buildings to be sustained into the long term and to evolve over time through the addition of new layers of heritage significance.

### **1. Proposed change of use**

**a. A detailed description of the proposed uses and suitability of the site for the proposed uses including discussion of any other uses that have been considered & discounted in order to demonstrate that the final proposal is the best option with least heritage impacts;**

This issue is partially discussed elsewhere in this Statement of Heritage Impact. The proposed uses, for tourism purposes, fundamentally means a comprehensive adaptation project to convert the Lands and Education Department Buildings, and potentially the subterranean public domain within the designated Sandstone Precinct, into a prestige standard, international quality hotel, commensurate with the architectural, spatial and urban significance of the buildings. It is therefore highly likely that most if not all of the following requirements will be incorporated into the adaption process:

- An entry drop-off and foyer area that creates a dramatic impression on arriving guests
- Registration, Concierge desks and support facilities
- A series of public spaces and facilities for formal dining, casual dining, formal and casual meeting areas and shopping opportunities
- Ready access to the various guest rooms through a series of public spaces including the existing or supplemented corridors and vertical circulation as appropriate
- A range of guest accommodation rooms and suites commensurate with the quality standards of the hotel and the capacity to adapt the internal, largely former administration office spaces within the buildings, in a sensitive manner that respects the heritage significance of the place.
- Recreation areas including spas, pools, gyms, business centres, library etc
- Conference/ballroom facilities where possible within the physical constraints of the buildings and/or the subterranean public domain
- Management and staff facilities

- Back of house facilities to support the essential guest services and accommodation functions
- Back of house facilities to support the various food and beverage operations and spaces within the buildings
- Goods delivery, waste and laundry collection and despatch
- Plant rooms etc and services distribution networks throughout to the buildings and connecting subterranean public domain
- Very limited car parking for guests, given the inner city location

In general the buildings are considered to have the capacity to incorporate all of the above facilities without an undue imposition on their essential heritage significance, with several major strategic provisos:

- The robust and very distinctive historic architectural imagery and character of the Lands and Education Department Buildings becomes, for the hotel operator, the very core of the identity of the new tourism re-use, reinforcing the distinctiveness of central Sydney as the "Spirit of Place" for a new international hotel destination.
- The various functional and spatial requirements for tourism re-use are carefully distributed across and within the two buildings, and potentially within the subterranean public domain. This will be done in a manner that responds directly to the detailed capacity of the individual buildings to absorb change and in accordance with the varying degrees of heritage sensitivity within each.
- The unavoidable physical interventions necessary to absorb change to the new uses are designed and integrated into the buildings in a manner that protects and enhances heritage characteristics, while minimising and/or mitigating potentially negative impacts.
- The extent of physical intervention is very carefully considered, directed to areas of lesser heritage, architectural or spatial sensitivity, and creatively responds to the nature of the existing buildings.
- Facilities that are not capable of being introduced within the architectural, spatial and physical constraints of the buildings or the subterranean public domain, without unacceptable impacts on heritage significance, are not incorporated into the project.

Refer to discussion elsewhere in the SHI report regarding alternative re-use options that have been considered. In essence that analysis concludes that, while there will be an impact on that aspect of heritage significance related to the continuity of original use, adaptive re-use for a prestige quality, international standard hotel presents one of the most sensitive and most sustainable opportunities, in heritage terms, for the continuity and evolution of the fundamental heritage significance of the two buildings. Adaptation to a hotel is also widely recognised as one of the most successful ways of facilitating casual public access to the public areas of major historic buildings. There is a wealth of national and international evidence within the heritage and tourism sectors to support this conclusion.

***b. What alterations and additions may be required to the interior and the exterior of the two buildings to accommodate the proposed uses and what are their potential impacts;***

Some alterations and additions will be required to the interiors of the two buildings, a process that can be mitigated by the careful allocation of new functions to spaces within the buildings that can accommodate them on a "loose fit" basis. These processes are likely to include:

- Subdivision of larger spaces to accommodate guest rooms and guest suites, on the basis that these subdivisions can respond to the differing character and significance of the many and varied spaces within the two buildings.

- Potential removal of the free standing, multi-storey toilet blocks from the inner courtyard to the Lands Department Building to open up and interpret the internal character of the original courtyard and carriage loop, and potentially roof over the atrium.
- Potential removal or re-working of the 1990s multi-storey circulation pattern within the courtyard of the Education Department Building and potential roof over the atrium.
- Additions by way of free-standing canopies or such-like at the street-level main entry to the hotel complex, wherever that may be located by the preferred proponent.
- Upper-level additions to the Education Department Building as outlined in SSD6751.
- General rationalisation and upgrading of service areas and services infrastructure.

***c. What future fire safety and easy access measures may be required to allow the proposed uses and what are their potential impacts;***

There is no doubt that fire safety and easy access measures will need to be reviewed and updated in accordance with the new use. The current buildings have been progressively upgraded over the decades in accordance with their specific use and regulatory requirements and opportunities.

It is highly likely that the project will require detailed fire engineering and accessibility proposals to be developed for each building and for any connecting subterranean public domain areas. These processes are now well established and are typically managed from within the pool of expert advisers that are available in Sydney for involvement in such a project. Their work will be guided by relevant conservation policies, by specialist conservation project members and through close liaison with heritage agencies to identify and introduce alternative strategies and solutions to issues that may generate less than preferred heritage outcomes.

The design and installation of new fire safety and easy access provisions will be undertaken with close oversight and creative design intent by the eventual project team, coupled with close scrutiny of the final design proposals by the Heritage Council and City Council heritage experts.

***d. What HVAC works will be required to allow the proposed uses and what are their potential impacts;***

The details of future HVAC installations are currently unknown. However, a major and extensive re-use project can mobilise sufficient resources and opportunities to remove outdated plant and equipment, that may not be as efficient or small as modern systems.

The installation of air-conditioning services in particular into historic buildings is always a challenge, one that demands innovation and lateral thinking, not only with the actual distribution within the building, but the conceptual approach to the environmental controls and outcomes that are required for different areas of the buildings.

The design and installation of new HVAC systems will be undertaken with close oversight and creative design intent by the eventual project team, coupled with close scrutiny of the final design proposals by the Heritage Council and City Council heritage experts.

***e. What other services will need to be upgraded and augmented? How will this work be carried out and what will be the potential impact;***

It is fair to assume that virtually all of the existing services within the two buildings will be replaced or upgraded to suit a use that has quite different requirements to the previous occupants. Nevertheless, opportunities will arise, as they do with the HVAC system, to review, revisit and update/upgrade the whole services infrastructure of the buildings,

potentially overcoming compromises that were forced upon earlier upgrades by financial, operational or physical constraints.

The design and installation of new services infrastructure will be undertaken with close oversight and creative design intent by the eventual project team, coupled with close scrutiny of the final design proposals by the Heritage Council and City Council heritage experts.

***f. How much and what type of signage will be required internally and externally to allow various proposed uses and what are their potential impacts; and***

External and internal signage will include hotel identification, room designation, safety and relevant way-finding material. The most important aspect in this regard is the ability of a prestige hotel operator to accept and celebrate the existing external and internal imagery of the building and its decorative features as part of their core identity.

There will be other opportunities for redundant or even unsightly current signage to be reworked and rationalised.

The design and installation of new signage etc will be undertaken with close oversight and creative design intent by the eventual project team, coupled with close scrutiny of the final design proposals by the Heritage Council and City Council heritage experts.

***g. Would the proposed uses require subdivision of any internal spaces by way of internal partitions? How will that be achieved without impacting on their significance and spatial qualities?***

As discussed above, it is inevitable that there will be subdivision of some internal spaces to provide accommodation rooms, public rooms, back of house and other facilities. The design and subdivision methodologies for internal accommodation will be undertaken with close oversight and creative design intent by the eventual project team, coupled with close scrutiny of the final design proposals by the Heritage Council and City Council heritage experts.

The advantage of the proposed combined use of the two buildings is that each can be allocated spaces and functions that create the most heritage sensitive outcomes for each building. This opportunity is reinforced by the proposed opening of the subterranean public domain to accommodate functions and facilities that would otherwise impose adversely on the historic buildings. The underground ball room and parking below Cumberland St in the Rocks for what was originally the ANA Hotel is a successful local example.

Summary:

All of these detailed issues will be managed under the auspices of the relevant CMP for the buildings and under the close-quarters involvement of qualified heritage architects and consultants, as well as other members of the design and project teams eventually selected for the preferred proponent's submission.

There will be a lengthy and detailed process of liaison between the project teams and specialists within the NSW Heritage Division and Sydney City Council to resolve the myriad of issues and opportunities that are a natural part of such large scale conservation and adaptive re-use projects.

***2. Additional floors on the Education Building***

***a. It is understood that there is no proposal to add any floor space on the Lands Building. However, three floors are proposed to be added on top of the Education Building. These floors will remain within the existing height of the lift motor room (RL 58.69). The extent of the additional floors and setback from the existing building facades must be clearly identified;***

This issue is assessed and discussed elsewhere in this Statement of Heritage Impact.

***b. Visual impact assessment of the proposed floors must be included as part of the Heritage Impact Assessment using photo montages (showing before and after shots) and three dimensional representations. These photomontages should include views from all significant view points and from any tall buildings in the vicinity;***

This issue is assessed and discussed elsewhere in this Statement of Heritage Impact.

***c. The Heritage Impact Assessment must specify if there will be any plant and equipment located above the RL 58.69 that has been proposed to define the maximum height of the additions;***

Detailed studies by TTW Structural Engineers have confirmed that the overall height of the proposal within SSD6751 is limited, in practical terms, by the inability of the existing structure of the building to support more additional volume than is currently proposed.

The proposed maximum height of the additional space has been explicitly included in SSD 6751. There is no information available to the SHI process that would suggest this height will be exceeded by any secondary elements such as plant or equipment. Definitive height controls are also contained in Sydney LEP 2012.

***d. The heritage impact assessment should provide a well-argued justification for the proposed setbacks and the intensification of development within the proposed building envelope;***

Much of this assessment and argument is contained elsewhere in this report. Key aspects of importance for assessment are the following:

The complex roofscape and highly significant collection of fine former office spaces within Lands Department are very sensitive to change, to the extent that SSD 6751 has deliberately avoided proposing any change to the main roof level architectural elements and composition of the building. Nevertheless, tourism re-use will require an ability to generate quite high revenue streams to support the initial conservation and adaptive re-use investment and then sustain the long term conservation of the buildings. A sizeable component of the revenue generation of any hotel is from the accommodation rooms.

The Education Department Building, with its visually robust and relatively less complex external architectural composition, especially at roof level, is more able to accept a limited new roof addition, if it is limited in scope and set sufficiently back from the main facades to retain a subservient and respectful relationship with the main building. The roof level addition on the southern end of the building and the caretakers flat behind the gallery skylights, are relatively lowly ranked in significance compared to the main sandstone facades and the gallery skylights.

Proposing the additional floor space above the existing building enhances the capacity of the Education Department Building to accept an increased number of income generating accommodation arising the tourism re-use opportunities within SSD 6751. This redirects development pressures away from the more significant and sensitive Lands Department Building, both internally and at roof level.

***e. Discussion of any other options that have been considered and discounted in order to demonstrate that the final proposal is the best option with least heritage impacts.***

Detailed studies of a series of alternative options are explored in depth elsewhere in this report. The range of alternative use options considered did not include more radical uses such as industrial or processing activities that are not appropriate or permissible for any location in the northern section of the Sydney CBD.

In essence, any change of use will have some impact on that aspect of significance related to the continuity of the existing, traditional occupation by stage government administrative agencies. Unfortunately, this process has begun, in accordance with a range of State

Government policy decisions. The challenge of any project at this point in time is to identify a new use that can minimise and/or mitigate any adverse impacts on significance, and enhance that significance wherever possible.

Of all the options considered, the tourism and cultural re-use options provide the most opportunities to retain, re-capture and present the historic and cultural heritage significance of the buildings and to maximise public access to a large proportion of their interiors. They are the use options that most closely align themselves with the spirit and public image of the historic buildings, as has been demonstrated on countless occasions internationally. In fact tourism re-use provides a better opportunity to retain and express significance than might a cultural re-use, given the inherent desire to create a new, self contained image, for most cultural facilities. The examples of the Museum of Contemporary Art in the former MSB Building at Circular Quay, or the *Carriageworks* theatrical venue at Eveleigh Railway Workshops are representative local examples. By contrast the conversion of the former State Theatre and Gowings Buildings to the QT Hotel and the current conversion of the former Sydney Water Head Office Building to the Greenland Hotel are excellent local examples of important, State Significant, historic buildings being sensitively converted to hotel use.

#### **4. Public Domain**

***a. Impact on the visual character of the area in the vicinity, being a group of historically significant and highly articulated, architecturally significant buildings forming the seat of power for NSW Government, must form part of the Heritage Impact Assessment report;***

The impact on the public domain has been discussed elsewhere.

In essence, the majority of the buildings that so ably demonstrate the historic concentration of NSW Government administrative power in Bridge Street and Macquarie Street have already been vacated by their original occupants and successfully given, or are in the process of being given, new lives in contemporary society. These include The Mint, Hyde Park Barracks, Treasury, Chief Secretary's, Health, Public Works/Industrial Court at 50 Philip Street. Lands and Education are now in this process. The historic Royal Exchange was demolished many decades ago. The State Library and Parliament House were both provided with very large modern additions in the later decades of the 20<sup>th</sup> century.

Despite the changes of use of the majority of the handsome brick and sandstone buildings within this administrative precinct, the historical and associational significance of the precinct remains undiminished. The individual buildings have, to a large degree, been retained, conserved and internally refitted or extended in a sympathetic manner. The intent contained in SSD 6751, supported by the two CMPs, is to continue this proven track record of successful adaptive re-use while maintaining the essential characteristics of heritage significance and the distinctive urban contribution of this collection of buildings.

***b. Any potential changes to the public domain including physical changes, traffic, changes and landscaping changes must also be discussed as part of the Heritage Impact Assessment.***

The potential changes are yet to emerge in any definitive manner. However, the potential is contained in SSD 6751 for the use of part of the ground level public domain within the Sandstone Precinct for a new entry to one or both of the historic buildings, for the introduction of vehicle access to an underground service area or parking and possibly for the installation of new substation capacity.

The concept of using the public domain at ground level for a new, subterranean entry has been offered as a creative option to redirect the provision of a major new hotel entry into one or both of the historic buildings, thus avoiding an adverse impact on the fine and highly significant historic facades.

If such a new entry concept is adopted, there will be some visual impact on the immediate streetscape arising from its presence. If well designed such a structure could be as acclaimed as the Pyramid in the Louvre. There need be no physical impact on the historic facades and the new structure could become the emblematic signifier of a new generation of internal use.

A new hotel use is likely to generate increased pedestrian activity in the surrounding streets and public domain, especially out of normal office hours. This enlivening influence will generate positive benefits to the social values of the precinct.

Entries to underground facilities such as loading docks or carparks are a common feature in Sydney, and most modern cities. Their ultimate impact on the immediate streetscape will need to be carefully designed. The urban and spatial qualities of Farrer Place indicate that there is unlikely to be any adverse intrusive interventions into this popular public space.

### **5. Impact on the Heritage Significance**

#### **a. Detailed discussion of the likely impacts of the proposal on the overall heritage significance of the subject properties and the area in general; and**

This issue is discussed at length elsewhere in this report.

In summary, there will be some negative impacts on significance, primarily that which has already been generated by the decision to vacate the building by the current occupants.

There will be some impacts on the internal fabric and spaces of the buildings arising from the future adaptation to a hotel. Not all of these impacts will be negative, many will be very positive or at least beneficial to the long term sustainability of the heritage character, identity and significance of the buildings. There will certainly be a considerable enhancement of the ability of the general public, staff, visitors and hotel clients to appreciate and gain an understanding of the heritage features and significance of the interiors.

There will be no adverse or unacceptable impacts on the external architectural character, materiality and distinctive architectural presentation of the two buildings in their own right or as components of the two special character areas in which they are located.

#### **b. Discussion of the likely impacts of the proposal on the heritage significance of any significant heritage buildings in the vicinity.**

This issue is discussed elsewhere in the report.

In short there be no adverse impacts on the heritage significance of any historic or heritage listed buildings, urban precincts such as Macquarie Place or Farrer Place or any notable streetscape in the vicinity of the historic buildings.

There will be no diminution of potential for the extensive "Colonial Sydney" precinct that has been nominated for National Heritage Listing, to be considered for such listing.

### **6. Conservation Management Plan**

#### **a. It is also considered that the Heritage Impact Assessment to be submitted with the application should assess the proposals against the policies of Conservation Management Plans, for the two buildings, endorsed by the Heritage Council of NSW.**

This detailed assessment is contained elsewhere in this report.

It generally concludes that, at a strategic level, commensurate with SSD 6751, the proposal has or can take account of the relevant conservation policies at the appropriate time.

### **7. Moveable Heritage Items**

**a. These buildings contain a significant collection of moveable heritage items consisting of furniture, fittings, fixtures, artworks, artefacts and other items associated with the Government use over a long period of time. It is noted that the draft CMPs submitted for endorsement by the Heritage Council include sections on moveable heritage with a list of items. The Heritage Impact Assessment accompanying the application must:**

- i. assess compliance with the policies contained in these sections of the CMPs; and**
- ii. identify any likely impacts on the significance of these moveable heritage items arising out of the proposed change of use and potential alterations & additions that may be required by the proposed use.**

This Statement of Heritage Impact recognises that the two buildings do contain a significant collection of what is known as moveable heritage items. It also recognises that some of the items or categories of items within those collections have been generally recognised by the supporting CMPs or other studies as potentially having a stronger association with the vacating agency than with the building as such. The prime example is the historic collection of student art held by the Education Department.

It is clear that the preparation of a Collections Management Plan for each building can only and must in fact be prepared in close consultation with the relevant vacating agency and with the incoming hotel operator.

The amended CMPs will contain a policy that calls for the preparation of a detailed moveable heritage or Collections Management Plan for each building. This must accompany the Stage Two application by the preferred proponent. The Plans will then be available for detailed review by the Heritage Council.

**b. It is recommended that a formal Collections Management Plan be submitted, either separately or combined, with the development application at stage 2, providing detailed recommendations on the future display conditions, conservation management, security and location of each of the identified moveable heritage items.**

The recommendation for the submission of a Collections Management Plan for each of the historic buildings is supported by the Statement of Heritage Impact. It should be included as a condition of consent should SSD 6751 be approved.

### 3.3 Tourism Re-Use: Lands Department

#### 3.3.1 Assessment against the CMP Statement of Heritage Significance

This section examines the potential of the SSD 6751 proposal to adversely affect each of the major components of the relevant Conservation Management Plan.

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

##### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that there will be some adverse impact on the current State level of heritage significance of the Lands and Education Department Buildings arising from the loss of the traditional occupation by state government administrative agencies. This loss has been generated by a State Government policy decision to relocate the current occupying agencies to other premises, a process which is currently underway, and to call for Expressions of Interest for the private sector conservation and adaptive re-use of the two buildings for tourism purposes.

It is highly unlikely, however, that the inevitable evolution of the heritage significance of the buildings will in any way adversely impact on the State Level of Significance currently held by either the Lands or Education Department Buildings.

*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 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.*

##### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that the proposal envisioned by SSD 6751 will have no unacceptable adverse impacts on the architectural character, historic purpose, historical associations or original civic purpose of the Lands Department Building.

*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.*

##### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that, with careful and carefully controlled execution of the future project, the proposal envisioned by SSD 6751 will have no unacceptable adverse impacts on the exceptional architectural expression, planning arrangement, historic motifs and symbolic external decoration or original colonial identity of the Lands Department Building.

*The building retains a very high degree of authenticity and integrity in both its external form and detailing and its interiors. The retention of the look, feel and spatial qualities of a late nineteenth century building, combined with its complementary townscape, is rare in Australia.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that while a future adaptive re-use proposal will need to be very carefully designed and executed, the policies and guidelines contained in the CMP, combined with relevant consents from the Heritage Council and City Council and/or Department of Planning, will generate an outcome that fully respects the retained authenticity and integrity of the external form and interior detailing. There is likely to be some rearrangement and/or reversible subdivision of some existing or former internal spaces. However any potential can be mitigated by locating adverse proposals in the adjoining, less sensitive interiors of the Education Department Building or at a subterranean level.

*The Lands Department Building is a very fine example of NSW Colonial Architect James Barnett'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.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that these historical associations will not be adversely affected by the proposal. In fact a tourism re-use provides many potential naming and graphic opportunities to recognise and celebrate these historic figures and associations within a future hotel.

*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.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that there will be no adverse impacts on any of these features of heritage significance of the Lands Department Building in its own right or as part of the historic civic precinct.

*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.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that with careful controls and sensitive design interventions, the vast majority of the distinctive features, remnant services installations and detailing noted above will be retained and/or celebrated by the current proposal.

## **3.3.2 Assessment against relevant CMP Policies and Guidelines**

This section of the Statement of Heritage Impact examines the proposal contained in SSD 6751 against the relevant conservation policies contained in the Conservation Management Plan for the Lands Department Building. The CMP also carries a wide range of specific conservation policies that will be applicable to the detailed design and resolution of a future preferred project submission and to the heritage impact assessment of that submission.

Section 5.0 of the Lands Department Building CMP carries the following conservation policies and guidelines of relevance to this Statement of Heritage Impact. Section 5.1 of the CMP confirms the purpose of the policies and guidelines.

*This section contains heritage conservation policies for the Lands Building. These conservation policies are aimed at guiding the building owner, lessee, sub-lessees, property managers, consultants and contractors through the processes of conserving, adapting, repairing and maintaining this significant heritage item. The policies aim to be sufficiently flexible in recognising the constraints and requirements for the place, while enabling the significance of the item to be retained and celebrated.*

*Decisions about future work to the Lands Building, including conservation, maintenance works and/or more extensive adaptation, should always take into consideration the significance of the place, both as a whole and the particular spatial and fabric elements affected. The conservation policies provide a set of guidelines to inform future decisions, but are not intended to impose a blanket prohibition on modifications to the building. It is critical, however, that future decisions are made on an informed basis.*

### **Conservation Policy Section 5.2: Ownership**

#### **POLICY 1.**

*The leasing of the Lands Building for private sector use should be on the basis of a long term 'whole of building' ground lease. Do not allow strata subdivision of the building that would result in multiple ownership and tenancies.*

#### **POLICY 2.**

*Conditions in the ground lease should require that:*

- *the Lessee adopts and complies with the policies in this CMP;*
- *the Lessee takes responsibilities for the monitoring, maintenance and repair of all significant fabric, which is to be clearly defined and funded; and*
- *the heritage impact of modifications to significant fabric proposed by the Lessee are adequately assessed by the Building Owner prior to the granting of owner's consent.*

#### **Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

### **Conservation Policy Section 5.3: Managing Change**

#### **POLICY 3.**

*Ensure all conservation works, maintenance programs and new works:*

- *are undertaken in accordance with the principles and objectives of the Burra Charter: the Australia ICOMOS Charter for the Conservation of Places of Cultural Significance;*
- *are undertaken in accordance with the policies in this CMP;*
- *use an understanding of all aspects of the cultural significance of the Land Building as one of the key factors for future planning and implementation;*
- *are aimed at ensuring the retention and enhancement of the cultural significance of the Lands Building;*
- *seek to minimise adverse heritage impacts;*
- *are co - ordinated by a project manager familiar with the philosophy, methodology and practice of heritage conservation; and*
- *follow the required statutory approvals or notification processes.*

**POLICY 6.**

*Change may be necessary for the continued use of the building, but it is undesirable where the change has an adverse impact on cultural significance. Any change which reduces cultural significance should be reversible, and be reversed when circumstances permit. Reversible changes should be considered temporary. Non - reversible change should only be used as a last resort and should not prevent future conservation action.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

The Guideline supporting Policy 6 states:

*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 of elements of Exceptional and High heritage significance;*
- *care is taken to minimise the adverse effect on heritage significance;*
- *the change helps to maintain the security or safety of the heritage building or its significant elements;*
- *there is no other alternative solution;*
- *new work is of a high design standard and quality materials used are sympathetic to the significant fabric.*

*It is also important to consult with expert consultants and with the relevant consent authorities as soon as practical when planning major changes.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 5.4: Use**

**POLICY 7.**

*Any new use of the Lands Building should minimise physical changes to the place, particularly changes that would involve subdivision or demolition of significant internal spaces, or the removal or obscuring of highly significant internal and/or external detailing.*

**POLICY 8.**

*Any new use of the Lands Building should provide for the economic sustainability and conservation of the asset into the future, including the funding of ongoing maintenance and repair.*

**POLICY 9.**

*If Government administrative use is no longer feasible then a use which enables a wider appreciation of the significant interiors of the building should be favourably considered.*

**POLICY 10.**

*As part of any change of use to the Lands Building an archival and celebratory record of its heritage value as a public institution should be made.*

**POLICY 11.**

*Due to the need to minimise physical interventions in the Lands Building consideration should be given to developing an integrated design solution for a new use that involves one of the adjacent buildings of lesser heritage significance*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 5.6: Setting/Expanded Curtilage**

**POLICY 13.**

*Any decisions regarding external change to the Lands Building should have regard to its important contributory role to the Bridge Street/Macquarie Place/Bulletin Place Special Character Area, especially its physical and historical relationships to the other public buildings on Bridge Street.*

**POLICY 14.**

*The Building Owner and Lessee should work with the City of Sydney Council and adjoining land owners to maintain the setting (expanded curtilage) of the Lands Building, in particular its relationship with adjacent heritage buildings and Macquarie Place and the conservation of significant views to and from the Lands Building and its landmark qualities.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 5.8: Retention of Key Aspects of Significance**

**POLICY 20.**

*The following aspects of the Lands Building are integral to the significance of the place. Manage them to ensure they are conserved and their heritage values retained.*

- *the internal layout of the building including the hierarchy of office spaces (ministerial to clerk level), the circulation corridors and central, multi - storey records storage space;*
- *the internal detailing of joinery and other finishes that denote the use of spaces, hierarchy of their users and publicly accessible areas;*
- *the external detailing of the building including fine stone carvings using a mix of Australian, British and classical motifs;*
- *the external form of the building incorporating more vernacular features such as verandas and classical details such as the copper domes, columns and clock tower;*
- *the statues of notable Australian explorers and surveyors that adorn the building exterior;*
- *design features relating to ventilation and light transfer;*
- *original technical detailing of the building form climate; daylighting, security and fire safety;*
- *the multi - storey central records storage room;*
- *the building's setting in Bridge Street;*

- the survey base line in the floor of the eastern circulation corridor on the ground floor, the survey base marker on the Bridge Street façade of the building and the remaining evidence of the observatory including its copper dome;
- the potential to interpret the ground floor carriage way; and
- movable heritage as outlined in the separate document: *Lands Building Movable Heritage Management Strategy (MUSEscape 2013) Appendix B.*

**POLICY 21.**

*Ensure adequate funding and resources are available to support the conservation, repair and maintenance necessary for the long - term conservation of the identified heritage values of the Lands Building; and ensure that all work is undertaken in accordance with the policies of this CMP.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 5.12: Adaptation, Alterations and Additions**

**POLICY 32.**

*External Change:*

- *Do not extend the building outside or above the existing building envelope.*
- *Any works to improved access to Level 4 and above or introduction of new plant equipment should not be located where it disrupts the significant roofscape, and/or can be seen from the expanded curtilage.*

**POLICY 38.**

*No new openings should be created in the external envelope of the Lands Building. Discrete new internal openings can be considered with some provisos.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 5.28: Public Access and Interpretation**

**POLICY 69.**

*Take the opportunity of any change of use to increase the areas open to public access in the Lands Building.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies.

## 3.4 Tourism Re-Use: Education Department Building

### 3.4.1 Assessment against the CMP Statement of Heritage Significance

This section examines the potential of the SSD 6751 proposal to adversely affect each of the major components of the relevant Conservation Management Plan.

*The Department of Education building has been synonymous with the provision of universal public education in New South Wales since its construction in 1915 and is still used for its original purpose. The Department's association with the site dates from its establishment under the Public Instruction Act 1880. The southern half of the building, the former Department of Agriculture offices, demonstrates that Department's importance in the development of scientific agriculture and support for primary production when this was a major industry in the state in the first half of the 20th century.*

#### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that none of these historic associations will be lost, despite the fracturing of contemporary functional uses of the building by the Education Department.

*The architectural style of the building, a restrained form of Federation Free Classical with plain facades highlighted by ornamentation at the entrances and upper floor entablature, is representative of contemporary tastes demonstrating external materiality and scale of the building in its original design by George McRae with Stage 2 (for the Department of Agriculture) being completed by a private firm, John Reid & Son.*

#### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that all of these fine and distinctive architectural features and materials can and will be retained and conserved as part of the future project envisioned by SSD 6751.

*The Department of Education building is a fine example of early 20th century government offices combining elements of their historic 19th century predecessors, with a concern for contemporary office design. Built in two stages 1912-15 and 1929-30, the building demonstrates rapidly changing methods in building construction of the early 20th century. The 1994-95 refurbishment, by noted architect Ken Woolley provided a rational and elegant solution to the historic problems posed by key planning differences between the two stages of construction and resulted in efficient circulation and improved accommodation to contemporary standards.*

#### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that the early architectural style and detailing of the building will be retained and conserved in the future project. It is too early to determine if the 1990s refurbishment works will be retained or at least remodelled in a future project.

*Although the second stage of the building (1915 and 1930) was designed by a different architect using a different, more technologically advanced form of construction, the external architectural presentation of the two stages is remarkably unified or consistent. Occupying the of the city block bounded by Bridge Street, Loftus Street, Young Street and Farrer Place, the building is a key element in the built landscape of Bridge Street, in the surrounds of Macquarie Place and in Farrer Place to all of which it makes a notable contribution. It is part of an important group of late 19th and early 20th century government offices that represent the continuing association of this area with government and administrative activities since 1788. The site is part of a street plan that reflects the earliest development of the city of Sydney.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that the second stage architectural style and detailing of the building, its powerful urban presence and historic associations will be retained and conserved in the future project.

*The Department's Art Gallery is unique in government offices and its student art collection, William Wilkins Memorial Art Collection, is the oldest in Australia.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that this art collection has been or will be relocated by the Department when it completes its operational removal from the premises. The CNP calls for the preparation of a Moveable Heritage Plan, in conjunction with the vacating Department.

*The building is associated with key personalities in the history of education in New South Wales including Peter Board and Sir Harold Wyndham. It is also associated with Government Architect George McRae, who is considered as a key practitioner of the Federation Romanesque, Anglo-Dutch and Free Style in Sydney and whose work played a dominant role in the evolution and spread of Federation architecture throughout Australia.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that these historical associations will not be adversely affected by the proposal. In fact a tourism re-use provides many potential naming and graphic opportunities to recognise and celebrate these historic figures and associations within a future hotel.

*The building has been the symbolic headquarters for generations of teachers and administration staff who have worked in the NSW education system since 1915.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that these historical associations will not be adversely affected by the proposal, although their demonstration within the fabric and spaces of the building is likely to be removed or expressed in a more interpretive manner.

*The heritage significance of the Education Building is enhanced by the collection of movable heritage including furniture and war memorials. The movable heritage of the building has an ongoing and continuous association with the government function and demonstrates the building's association with public service. The collections of furniture and fixtures associated with public service and government administration demonstrate superior quality in local design, manufacturing and materials. The war memorials are of particular social significance for its commemoration of the role of Department of Education employees in war.*

### **Impact Assessment and Commentary**

The analysis and evaluation conducted during the preparation of this SHI demonstrates and confirms that a considerable proportion of the "moveable heritage" will be relocated by the Department when it vacates the building and moved to locations where the close associations can be retained and celebrated in a more direct manner than if the items were retained in-situ. This issue will be the subject of future negotiations with the Department and be guided by an updated Moveable Heritage Strategy that takes account of the new uses and occupants.

### 3.4.2 Assessment against relevant CMP Policies and Guidelines

This section of the Statement of Heritage Impact examines the proposal contained in SSD 6751 against the relevant conservation policies contained in the Conservation Management Plan for the Education Department Building. The CMP also carries a wide range of specific conservation policies that will be applicable to the detailed design and resolution of a future preferred project submission and to the heritage impact assessment of that submission.

Section 10 of the Education Department Building CMP carries the following conservation policies and guidelines of relevance to this Statement of Heritage Impact. Section 10.1.1 contains the contextual background discussion to the conservation policies.

*The NSW Government has determined that the building will be utilised by the private sector (namely office, commercial or tourism uses) in the near future. As details regarding any potential lessee, nature of works or specific use is not known it is not possible to provide specific policies for its conversion. Although the future use has been identified as tourism by the Government as the owner, the following policies seek to guide the adaptive reuse of the building regardless of the proposed use itself.*

*The conservation policies are intended to assist and guide the building owner, site managers, consultants, contractors and occupants through the processes of conserving, repairing, maintaining and using the site. The conservation policies provide a set of guidelines to inform future decisions, including the adaptive reuse of the building. Decisions about future work including repair, conservation, maintenance works or future additions and development should take into consideration the significance of the place as a whole as well as of the affected separate parts and their interrelationship. The conservation policies are not intended to prohibit change at the site. Use of the policies will ensure that future decisions are made on an informed basis enabling the significance of the place to be retained and enhanced. The policies target the issues that are relevant to the site but also are intended to be flexible in recognising the site and owner's constraints and requirements.*

#### **Conservation Policy Section 10.2.1: Building Ownership, Management and Tenancy**

##### *Policy 1.1 Ownership*

*Ownership of the building should remain with the NSW Government to ensure that the NSW Government continues to monitor appropriate use and change to the Education Building.*

##### *Policy 1.2 Leasing*

*Leasing of the Education Building is considered acceptable. However, any lease should be to a single entity (the Head Lessee) to ensure continuity of use within the building. Any sublease would need to be approved by the Holder of the Ground Lease and must take into consideration any heritage impact.*

*Ground Lease should be on the basis for a long term 'whole of building' lease, and not multiple leases for parts of the building. Strata subdivision is not appropriate.*

##### *Policy 1.3 Responsibility for ongoing care*

*The responsibility for the ongoing care and maintenance of the Department of Education Building should be incorporated into Head Lease obligations. This responsibility involves the employment of a strategy for the protection of significant fabric and spaces and the architectural integrity of the building.*

##### *Policy 1.4 Management Programme*

*Establish and maintain a Management Programme that:*

- Integrates conservation and maintenance into the overall management of the Department of Education Building*
- Disseminates the aims and objectives of this Conservation Management Plan to the appropriate building managers*
- Outlines the responsibilities at each staff level for implementing this Conservation Management Plan*

*Policy 1.5 Ongoing Commitment*

*There shall be an ongoing commitment from the lessee and manager of the building to make adequate financial provision for the engagement of persons able to provide relevant and experienced conservation and management advice.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 10.2.2: Use of the Building**

*Policy 2.1 Compatible Uses*

*Future uses for the building would be considered compatible if the following criteria are met:*

- *The symbolic significance of the building is not compromised.*
- *The new use is sympathetic to the original use and does not detract from that use, particularly in relation to the art galleries at Level 7.*
- *Fabric and spaces are not to be destroyed, damaged or altered except in accordance with later policy: Treatment of Areas and Elements of Various Levels of Significance.*
- *The nature of any new use would not result in an unacceptable level of wear and tear on the fabric.*
- *Any fixtures or fittings required for the new use would not damage or compromise significant fabric.*
- *Future compatible uses may include commercial offices, reception rooms with galleries, private sector and libraries.*
- *Residential apartment use is not considered as a compatible use for the Education Building.*

*Policy 2.4 Incompatible Uses*

*Considering the significance of Department of Education Building as identified in the Statement of Significance, incompatible uses of the buildings include uses of the building which:*

- *Require the removal of the highly significant original spaces;*
- *Require the removal of the highly significant elements; or*
- *Do not complement the government administrative nature of the neighbourhood or do not reflect the design and construction methodology of the building as identified in the Statement of Significance; or*
- *Require the removal of, or the loss of significant features of the highly significant fabric;*

*Policy 2.5 Uses to be Encouraged*

*Considering the significance of the Department of Education Building as identified in the Statement of Significance, uses of the buildings to be encouraged include:*

- *Uses, which are compatible with historical use of the building.*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

### **Conservation Policy Section 10.4.7: Interpretation and Public Access**

*Policy 14.26 Provision of public access*

*Make provision for public access on a regular basis to areas of interest including the Level 2 atrium, the former ministerial suite and the art galleries.*

*Policy 14.27*

*Maintain the intent and tradition of the building by encouraging the use of the art galleries for the public exhibition of student artworks as possible.*

Comment:

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

## **3.5 Potential Subterranean Public Realm Works**

### **3.5.1 Assessment against relevant CMP Policies and Guidelines**

#### **Conservation Policy Section 10.2.2: Use of the Building**

*Policy 2.6 Inappropriate Uses in the setting*

*Considering the significance of the Department of Education Building as identified in the Statement of Significance, inappropriate activities in the place and its setting include:*

- *Activities that obscure the view of the building.*
- *Development that removes and obscures the significant rooftop sky lanterns*

Comment:

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

#### **Conservation Policy Section 10.5: Archaeology**

*Policy 15.1 Archaeological Assessment*

*An Archaeological Assessment should be prepared by a suitable qualified archaeologist prior to any excavation works under the Education Building.*

A preliminary archaeological assessment has been carried out by an independent archaeologist and is submitted under separate cover as part of the SSD 6751 submission.

## 3.6 Additional Accommodation at Roof Level: Education Department Building

### 3.6.1 Assessment against relevant CMP Policies and Guidelines

#### Conservation Policy Section 10.2.2: Use of the Building

*Policy 2.6 Inappropriate Uses in the setting*

*Considering the significance of the Department of Education Building as identified in the Statement of Significance, inappropriate activities in the place and its setting include:*

- *Activities that unnecessarily destroy significant original fabric*
- *Activities that obscure the view of the building.*
- *Development that removes and obscures the significant rooftop sky lanterns*

**Comment:**

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

#### Conservation Policy Section 10.3.1: Setting

*Policy 13.1 Site Context & Setting*

*Any proposals for alterations to the external facades or roof of the building must take into account the impact on the aspect of the building as seen from key viewpoints, principally from Bridge Street (east and west ends) and Bent Street (high view from the south-east, and west), and O'Connell Street.*

**Comment:**

There is no specific reference in the CMP to the two Special Character Areas that form in the immediate urban setting of the Education Department Building. However the assessment undertaken in Sections 3.1.9 and 3.1.10 above have concluded that the potential roof addition to the Education Department Building will have no adverse impact on the setting.

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

#### Conservation Policy Section 10.4.1: Building Exterior

*Policy 14.1 Building Exterior*

*The building exteriors and roof areas shall be conserved maintained and managed in accordance with Policy 1.17 Treatment of Site Areas and Elements.*

*Policy 14.2 Building Form*

*Retain the existing form of the building. There is an opportunity to incorporate some new work in areas of moderate and little significance including the Level 8 additional 1930s accommodation, Level 9 plant room, in the 1970s lift and fire stair upgrade or in the 1990s refurbishment areas. Any such work should be closely guided by the recommendations and policies of this Conservation Management Plan, in order that impacts on heritage significance can be positive rather than negative.*

*Policy 14.4 New work and vertical additions*

- *Additions to the Education Building should be kept to a minimum. New works and vertical additions must be limited to areas where elements of little significance have been identified such as the plant rooms.*
- *Any roof top additions must be designed, scaled and sited such that they do not challenge the architectural scale, power and dominance of the main building volume.*
- *Additions involving any intervention with highly significant fabric, including but not limited to the Sky Lanterns, should not be permitted.*
- *Any vertical additions should be designed to retain and protect the sky lanterns, and be setback from the stone parapet in a manner that respects and compliments the building's significant architectural style, features and form.*
- *The current highest point of the Education Building is RL 58.69, which is the top of the existing lift motor room on Level 9. Maximum height of any future vertical addition should not exceed the RL 58.69 and be designed in a well-articulated manner to avoid a box-like bulk at the top of the building.*

*Comment:*

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

**Conservation Policy Section 10.4.3: Building Structure**

*Policy 14.7 Conservation of building structure*

*Retain, conserve and maintain all structural elements of the original c.1915 and c.1929 building phases and the subsequent 1990s additions and alterations.*

*Comment:*

SSD 6751 includes a proposal to undertake the project on the basis of a 99 year lease for the two buildings. Suitable requirements will be included in the Head Lease requiring the Lessee to comply with all the conservation policies contained in the CMP. Accordingly, SSD 6751 complies with these conservation policies. Subsequent detailed proposals to be eventually submitted by the preferred proponent will be the subject of careful design and detailed assessment by all relevant heritage consent agencies.

A detailed assessment of the existing buildings and the surrounding context by JPW Architects and TTW Engineers concluded that the existing structure of the Education Department Building could not support any additional floors above those that are proposed within SSD 6751.

### 3.7 Assessment of Impact on Special Character Areas

#### 3.7.1 Bridge Street/Macquarie Place/Bulletin Place Special Character Area

Principle	Assessed Outcome
<i>(a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.</i>	The proposal is consistent with the character statement particularly as the dominant buildings that define the immediate precinct within the SPA are retained and conserved, while being enlivened by the proposed tourism related uses.
<i>(b) Recognise and enhance Bridge Street as one of Sydney's pre-eminent urban spaces and as the locality of heritage items which have housed activities of State and National significance.</i>	The proposed development will recognise and enhance the role and character of Bridge Street primarily by retaining and conserving the two major heritage buildings.
<i>(c) Protect and extend morning sun access to Macquarie Place, Bridge Street and First Government House Place.</i>	The proposal will have no influence on morning access to these important public spaces.
<i>(d) Conserve the existing significant laneways in the area and encourage active uses, where compatible with their significance.</i>	The proposed development does not affect these laneways in any manner.
<i>(e) Maintain and reinforce existing important public spaces, intersections and corners, in particular those crowned by significant buildings, such as the Lands Department and the Chief Secretary's Department Building.</i>	The proposed development will ensure that these two major buildings retain their prominent role and reinforce important public spaces, intersections and corners.
<i>(f) Maintain and enhance existing views to the water, and also significant vistas to the Lands Department Building from Loftus Street, Macquarie Place and Bridge Street itself, in addition to the vista along Bridge Street to the Conservatorium of Music.</i>	The proposed development will protect the identified existing views or vistas.
<i>(g) Maintain and reinforce the cohesive and rare streetscape character of Bridge Street and Macquarie Place by requiring new buildings to be built to the street alignment and with building heights that reinforce the existing predominant street frontage height.</i>	The proposed development , including the roof top addition, is consistent with the existing streetscape mass and scale of the Education Department Building.
<i>(h) Protect vistas that terminate at significant heritage buildings, including nineteenth and twentieth century public and commercial buildings.</i>	The proposed development retains and protects existing vistas.

### 3.7.2 Farrer Place Special Character Area

Principle	Assessed Outcome
<i>(a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.</i>	The proposed development will satisfy the outcomes expressed in the character statement and supporting principles.
<i>(b) Reinforce the urban character and sense of enclosure of Farrer Place by requiring new buildings to: i. be built to the street alignment; and ii. have adequate setbacks above the street alignment.</i>	The proposed development retains the existing Education Department Building and its street alignment. The proposed roof top addition is set back sufficiently to have no impact on the robust visual and urban relationship of the Education Department Building with Farrer Place.
<i>(c) Restrain the building bulk and scale of new development, particularly to the east and south of the place.</i>	The proposed expansion of the building envelope is relatively minor compared to the existing large urban bulk and scale. It is set well back and respects this principle.
<i>(d) Protect and extend winter sun access to the place, particularly during lunchtime.</i>	The propose development will generate some additional shadow impacts on the stairs and ground plane of 1 Bligh Street. However, this is not a heritage related issue.
<i>(e) Interpret the history of the place and its evolution in the design of new buildings and elements within the public domain and give it its own sense of place.</i>	The proposed development does not include such interpretation. However, it will facilitate the provision of such interpretation as part of a Stage Two application by the preferred proponent.
<i>(f) Improve, enhance and activate the public domain within the place.</i>	The proposed tourism related re-use of the two historic buildings will enliven the surrounding streets and public domain through the increased pedestrian traffic, including that generated after normal office hours, when the streets in the northern CBD can feel deserted on occasion.
<i>(g) Maintain and enhance existing views to Sydney Harbour and the Harbour Bridge to the north and vistas to the tower of the Lands Department building to the west.</i>	The proposed development will maintain these existing views from the public realm.

## 4.0 Conclusions and Recommendations

### 4.1 Conclusions

The proposed tourism related re-use of the two major historic buildings and the "Sandstone Precinct" as a whole, and proposed additional floor space volume on the upper levels of the Education Department Building, contained in SSD 6751, will have some adverse impacts on the heritage significance of the place. Nevertheless, in general, the proposed development accords with the intent and objectives of the relevant and strategic conservation policies contained in the Conservation Management Plans for the two iconic historic buildings.

In fact there is an excellent potential for positive to very positive impacts on the sustainability and evolutionary potential of their heritage significance:

Of the various alternative land uses examined in the options analysis, only the options of cultural centre and tourism use would generate significant increases in public access into and within the buildings. Such access is not readily available in their current use as centres of government administration.

The NSW Government will retain ownership of the land and the buildings, within the context of a 99 year lease for the of the relevant property parcels within the Precinct.

The retention, continuity and evolution of the heritage significance of the place will be carefully managed through the relevant provisions of the ground lease. These provisions will be grounded in the policies and guidelines of the two CMPs prepared for the historic buildings and by any relevant terms of approval issued by the NSW Heritage Council and conditions of consent issued by Sydney City Council or the Department of Planning for a future Stage Two project application.

Overall, there is a strong potential for the project envisioned in the SSD 6751 proposal to mobilise extensive private sector financial resources and for their application to the retention, conservation and sensitive adaptive re-use for tourism related purposes of the Lands and Education Department Buildings. This is highly likely to have a very positive outcome on the long term continuity and evolution of the heritage significance, architectural character and enhanced public accessibility of these two fine and distinctive heritage buildings and their surrounding public domain.

There is little or no risk of any adverse impacts on the heritage significance of any listed heritage item in the vicinity of the project or on the Bridge Street/Macquarie Place/Bulletin Place and Farrer Place Special Character Areas. In fact the additional pedestrian activation of the surrounding streets that is often generated by high quality tourism hotels will result in a positive outcome for this public domain.

In terms of the heritage provisions of Sydney LEP 2012 and Sydney DCP 2012, and in accordance with good national and international conservation practice as guided by the two CMPs, there is no doubt that the SSD 6751 proposal does respond to and respect the significance of the buildings and the context.

### 4.2 Recommendation

On the basis that there are no adverse, unacceptable heritage impacts, the Department of Planning should have no hesitation in approving the SSD 6751 Stage One proposal for tourism re-use of the "Sandstone Precinct", including the Lands and Education Department Buildings, the potential for some additional floors over part of the Education Department Building and potential subterranean public domain facilities.