

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

19 October 2021

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

Dear Sir,

**HERITAGE IMPACT STATEMENT
PROPOSED MODIFICATIONS - LANDS BUILDING
23-33 BRIDGE STREET, SYDNEY
S4.55 APPLICATION TO MODIFY SSD 7484**

INTRODUCTION

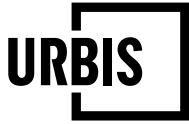
This Heritage Impact Statement has been prepared to assess the impact of the proposed modifications to the approved proposal for the Lands Department Building (Lands Building) located at 23-33 Bridge Street, Sydney. The updated demolition drawings submitted for this Modification 15 Submission of SSD 7484 are largely consistent with the previous drawings submitted under Modification 4 and Modification 9. The proposed modifications, the subject of the S4.55 Application to Modify SSD 7484, are the result of further design development undertaken by the consultant team and contractor (Built) and are required to:

- Facilitate additional demolition to select areas of the Lower Ground floor in response to the developing architectural, structural and services design and documentation; and
- Rectify inconsistencies within the previously approved demolition plans.

The S4.55 Application is being submitted following approval of State Significant Development (SSD) Stage 2 Application Number SSD 7484, for the adaptive reuse of the Lands Building, located at 23-33 Bridge Street, Sydney, and the Education Building, located at 35-39 Bridge Street, Sydney as a hotel facility. Both buildings have been described as the "Sandstone Precinct".

The modifications have been designed by Hassell and developed with Urbis' (as nominated Heritage Consultant) and Purcell's heritage input (as Heritage Architect) to minimise adverse heritage impacts while providing a rational structural and services outcome, as well as reasonable amenity as the building is converted to hotel use.

We understand that this Heritage Impact Statement will be submitted to the Department of Planning, Industry and Environment. Overall the proposal is considered to have an acceptable heritage impact



on the significance of the Lands Building in the context of the major adaptive reuse work. The proposed modification to the Lands Building proposal will have less heritage impact than the work originally approved by SSD7484.

METHODOLOGY AND STRUCTURE

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

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

SITE IDENTIFICATION

The Lands Building (23-33 Bridge Street, Sydney) is located on the south side of Bridge Street facing Macquarie Place to the north, and occupies a whole block bounded by Loftus Street to the east, Gresham Street to the west, and Bent Street to the south. It is described by NSW Land and Property Information as Lot 1877, DP 877000.

HERITAGE MANAGEMENT FRAMEWORK

The statutory heritage management framework of the Lands Building is as follows:

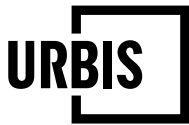
- Listed on the NSW State Heritage Register under the NSW Heritage Act 1977 (SHR No. 00744).
- Listed in Schedule 5 of the *Sydney Local Environmental Plan 2012* (Item 1683) as a State heritage item - *Former 'Department of Lands' building including interior*.
- Partially included (northern portion)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

The Lands Building is included on the National Heritage List as part of the "Governors' Domain and Civic Precinct". The area includes many sites fronting Macquarie and Bridge Streets and beyond, including the Lands Building. The "Governors' Domain and Civic Precinct" was inscribed onto the NHL on 10 February 2021.

REPORT LIMITATIONS

Archaeological assessment of the subject site is outside the scope of this report.

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



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

CONCISE HISTORY

The following concise historical outline (*italics*) for the Lands Building has been sourced from the NSW State Heritage Inventory on-line database:

When responsible government was introduced into New South Wales in 1856 a new department of Lands and Public Works was created to bring together the work of the Surveyor General, the Commissioner of Crown Lands, the Colonial Architect and the Commissioners of Roads and Railways: the last two joined a separate Department of Public Works in 1859, while the separate Department of Lands added sheep, coal-fields and, until 1869, immigration to its portfolio. Its principal functions of surveying, selling and leasing crown land, proclaiming town, village and recreation reserves and administering pastoral areas created a high volume of work and a dedicated building was needed.

The new Lands Department building, designed by James Barnet, the Colonial Architect, was built in two stages, 1876-80 and 1888-93. The site had been occupied since 1788 by the Surveyor General and other officials, and the main Survey building on the site remained in use while the Bridge Street section of the new building was erected by John Young in the 1870s. A more complex bureaucracy was created by the new Lands Act of 1884 and the second stage of the Lands Building was urgently required by 1887. The old buildings were demolished in 1888 by new contractors, Waine and Baldwin, and, after five years of waiting, the whole complex was occupied in 1893. The dome had been completed in 1891 but the hydraulic lifts were not installed until 1894-5 and the 23 statues in the 32 niches took until 1901 to be carved by a variety of sculptors. The highly important Datum Bench Mark Plug, which controls all levels in the state, was inserted on the front of the building at some time between 1887 and 1894.

Initially after 1893 the building was shared by Lands and by Mines and Agriculture, but later reverted to Lands alone. Various internal alterations were made, most notably in the 1950s, when two new lifts were installed, and in the mid 1970s, when a campaign of sandstone conservation was begun. A major fire in 1984-5 made further massive expenditure necessary. Although there were plans to convert the building into a casino or a hotel, it remains the home of what is now the Department of Land and Water Conservation.

In 2013 Government Property New South Wales (GPNSW) identified the "Sandstone Precinct", comprising the Lands and Education 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 had an interest in adaptively re-using these fine historic buildings for tourism related purposes.

To assist in providing further certainty to potential lessees, GPNSW sought approval from the Minister of Planning for a Stage One Development Application which established the project concept.

The Stage 1 Approval SSD 6751 was granted by the NSW State Government for work including:

- *Adaptive reuse of the Lands Building and Education Building for tourist accommodation, and ancillary uses;*
- *A building envelope up to RL58.69 (approximately 3 additional storeys) above the Education Building; and*
- *An indicative subterranean building envelope below the Lands Building and Education Building, under Loftus Street, Farrer Place and Gresham Street.*

The Stage 1 Approval SSD 6751 was subsequently modified to amend the height of the approved Education Building envelope and to introduce a building envelope to the roof of the Lands Building.

In September 2015 GPNSW formally awarded Pontiac Land Group the right to lease and adaptively reuse both the Lands and Education Buildings in Bridge Street, Sydney as a hotel.

The Stage 2 detailed development application SSD 7484, the subject of this modification application, was also approved on 24 April 2018 and granted consent for the adaptive reuse of the Sandstone Precinct for tourist and visitor accommodation. To date there have been multiple modifications.

For further historical information see the updated Conservation Management Plan prepared by GBA Heritage for the Lands Building in May 2017 and both endorsed by the NSW Heritage Council on 7th June 2017.

ESTABLISHED SIGNIFICANCE OF THE SUBJECT SITE

The following Statement of Significance for the Lands Building, located at 23-33 Bridge Street, Sydney is drawn from the updated and endorsed CMP for the Lands Building prepared by GBA Heritage in 2017, which in turn was drawn from the 2015 CMP:

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

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

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

The building retains a very high degree of authenticity and integrity in its external form and detailing, its internal layout and decorative detailing, and its moveable heritage. The

retention of the look, feel and spatial qualities of a late-nineteenth century building, combined with its complementary townscape, is rare in Australia.

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

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

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

THE AMENDED PROPOSAL

The updated demolition drawings dated 15.10.21 and Design Statement (19.10.21) prepared by HASSELL and submitted for this Modification 15 Submission of SSDA 7484 are largely consistent with the previous drawings submitted under Modification 9. The proposed modifications to the scope, the subject of the S4.55 Application to Modify SSD 7484, are required to:

- Facilitate additional demolition to select areas of the Lower Ground floor in response to the developing architectural, structural and services design and documentation; and
- Rectify inconsistencies within the previously approved demolition plans.

The key amendments can be summarised as follows:

- Temporary removal of retained portions of existing courtyard gantries. The sections of retained gantries (as outlined in Modification 9) are to be temporarily removed to facilitate their conservation and reinstated to match existing on completion of the works.
- Updated demolition extent to LG.28 to facilitate access into the site at grade. This represents the only at-grade access into the site, and it is vital for the construction of the project that sufficient access is provided into site for the safe movement of vehicles, equipment and materials.
- Temporary removal of floor structure (joists) to Lower Ground floor rooms LG.01-LG.08, LG.14 and LG.24-LG.25 to facilitate the installation of new in-ground hydraulic services. Modification 9 included the removal of the existing timber floorboards within these spaces, however following extensive coordination, the floor structure requires temporary removal to facilitate the services installation without impact on the existing walls and footings structurally. The consultant team has determined that the removal of these floors is critical, to enable the low level gravity drainage to be

installed and reticulated and it is noted that this is extremely constrained by the existing invert levels of the street connections. It is further noted that these areas will be inaccessible upon completion of the project, thus requiring the construction of the servicing to be undertaken without compromise to the final system to protect remaining heritage fabric during construction and for the life of the building. The salvaged floor joists will be installed at the same level, and the salvage of original floorboards to the retail areas of the Lower Ground floor remains as per previous approval. New floors will be installed where previously approved.

- Localised removal and reinstatement of stone floors to three areas within the Lower Ground floor corridors to allow for installation and reticulation of in-ground services. To minimise impacts across the Lower Ground floor, the service runs have been carefully designed and coordinated to both minimise the number of corridor crossings required, and to avoid prominent, public locations and significant heritage features. The stone will be carefully lifted in the proposed locations, and reinstated to match existing following completion of services installations. It is noted that there will be no disturbance to, or impact on, the chain measure in the eastern corridor as a result of the works.
- Removal of contemporary, intrusive concrete floor and landing to northwest corner (LG.67).
- Removal of one original lath and plaster ceiling to LG.09. This space is to be converted to a commercial kitchen (as per Modification 4), and following extensive design development and coordination with the consultant team, a new ceiling is required to fire rate the space. Two new ceilings will be installed, a higher ceiling to achieve the required fire rating, and a lower, secondary ceiling suitable for a commercial kitchen environment. It is noted that this space is a back of house area, not accessible to the general public.
- Clarification of extent of demolition and rectification of inconsistencies in previous demolition extents comprising the full demolition of the existing WC's, including flooring, located adjacent the central stairs and north and south courtyards, and the demolition of the flooring within the former attendant enclosure to the Loftus Street entry. Both areas comprise the removal of fabric of little significance, or intrusive fabric, the full demolition of which remains consistent with Modifications 4 and 9.

The modified works have been designed by Hassell and developed with Urbis' and Purcell's heritage input to minimise adverse heritage impacts while adapting the building into a high quality, functional hotel facility.

ASSESSMENT OF HERITAGE IMPACT

The proposed changes under Modification 15 are assessed to have a limited, yet acceptable impact on the significance of the Lands Building in the context of the major adaptive reuse work. On balance, the proposed modification to the amended Lands Building proposal will still have less heritage impact than the work originally approved by SSD7484.

All adaptive reuse projects will inevitably have heritage impacts which cannot be completely avoided in order to effectively re-purpose important historic buildings. The challenge is always to retain those aspects of a place that make a defining contribution to its overall significance while carefully guiding required change.

The amended demolition proposal has been the subject of careful analysis, ongoing heritage advice throughout the design development, and has considered the associated impacts and mitigating factors required to effectively adapt the subject building to hotel use. We believe an appropriate balance has been reached and that, generally, retains and protects all those aspects of the place that make a

defining contribution to the significance of the Lands Building. Any adverse impacts on fabric are outweighed by the broader meritorious outcomes of the amended proposal, and these are in overall terms, limited in nature and focused on fabric that does not make a defining contribution to the significance of the place.

It remains essential that the adaptive reuse interventions equip the building to function in its new role as a commercially viable tourism facility while protecting and celebrating its heritage significance. In our expert opinion the amended demolition proposal will achieve this, and will have an acceptable heritage impact.

Further, the modifications to the approved proposal are in accordance with the following policies identified in the endorsed CMP. The endorsed CMP for the Lands Building prepared by GBA Heritage in May 2017 identifies the following relevant policies for the Lands Building:

Policy 6.2.4

Future changes to fabric, form and associated structural elements should respect the building's visual significance and architectural integrity, and respond accordingly to the Grading of Significance

Policy 6.9.1

In general, future changes should be focused on areas or components which provide a lesser contribution to the overall significance and are, therefore, less sensitive to change.

Policy 6.14.15 CEILING PLASTERWORK

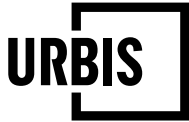
The elaborate lath and plaster decorative plasterwork throughout the Lands Building contributes to the significance of the place and must generally be retained in-situ, repaired and conserved.

Policy 6.16.2 UPGRADE OF SERVICES

Ensure that the upgrading of services and/or planning for new services:

- *Minimises the impact on significant fabric;*
- *Locates services in areas of lesser significance or areas already containing services;*
- *Uses the existing penetrations as much as possible; and*
- *Avoids areas of potential archaeological sensitivity.*

This letter confirms that the proposed modifications are in accordance with the endorsed conservation policies. Works proposed to significant lath and plaster ceilings are limited to one room with considerable servicing requirements, and the bulk of significant ceilings will be retained, and conserved. The loss of once ceiling is deemed to be in accordance with the above policy which seeks to generally retain ceilings in-situ. The temporary removal of floor joists is required to facilitate the installation of services necessary as part of the adaptive reuse of the site. These elements will be



salvaged and reinstated, limiting potential heritage impact. Additional demolition proposed in other areas is minor in nature and will not have an adverse impact on the significance of the Lands Building.

CONCLUSIONS

The proposed modifications will have a limited, yet acceptable impact on the historic fabric and significance of the Lands Building in the context of the major adaptive reuse works. The proposed modifications, the subject of the S4.55 Application to Modify SSD 7484, are required because:

- The architectural, structural and services design has been further developed; and
- Rectification of inconsistencies in the previous documentation is required to achieve construction certification.

The modified proposal is generally in accordance with the intent of the endorsed May 2017 CMP prepared by GBA Heritage. The proposal is also considered to be in accordance with the requirements of the *Sydney Local Environmental Plan 2012* and the guidelines of the *Sydney Development Control Plan 2012*.

Overall, the proposal is considered to have limited additional heritage impact on the significance of the Lands Building in the context of the major adaptive reuse work. The proposed modification to the Lands Building proposal will have less heritage impact than the work approved by SSD 7484.

RECOMMENDATION

The proposed modifications will have limited additional heritage impact on the Lands Building, in the context of the major adaptive reuse works approved by SSD 7484 to adapt the building to hotel use. On this basis we recommend that the Department should have no hesitation, on heritage grounds, to approve the S4.55 Application to Modify SSD 7484.

Should additional information be required, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink that reads "Renee Riley".

Renee Riley
Associate Director
+ 61 2 8233 7627
rriley@urbis.com.au