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Ref: SSD 7484

Mr Brendon Roberts
Department of Planning and Environment
23-33 Bridge Street
SYDNEY NSW 2001

By email: brendon.roberts@planning.nsw.gov.au

Dear Mr Roberts

Sandstone Precinct Stage 2 DA for Tourist and Visitor Accommodation (SSD 7484)

I refer to your email received 15 November 2016 inviting the Heritage Council of NSW (Heritage Council) to comment and provide recommended conditions of consent on the above proposal.

The Heritage Council has had the opportunity to provide input during various stages throughout the design development of this SSD and is impressed by the care that has gone into the detailed design of the buildings. The Heritage Council looks forward to a new world-class building for Sydney.

The Stage 2 detailed design of the Lands and Education Building adaptive reuse project effectively demonstrates an appreciation of the history of these two state significant buildings, with sensitive and innovative modifications that are clearly guided by a detailed understanding of the building fabric.

Whilst substantial alterations are inevitable as a result of the approved change of use, the scope of archaeological impact has effectively been reduced through design modification, and the project manages to enhance the quality and character of the two buildings through its sensitive and innovative design. High quality contemporary architecture has been successfully integrated into its historic context.

The general approach to heritage is supported, and it is understood that this is a complex project that involves substantial new features and interventions. However, further design detail is required for some elements to ensure best practice and to enable the Heritage Council to sufficiently review the heritage impacts of the project.

Specifically, the proposed pool and spa and water "villa" at the Education Building are substantial new features that could impact on the heritage fabric and structural integrity of the Education Building. It is recommended that these aspects of the proposal are not supported at this stage and that further detailed information is sought, with input and review from a structural engineer, and that the detailed design is referred to the Heritage Council for comment prior to approval of these works. In the case of the pool and spa, further consideration should be given to interpreting its former use as a ballroom.

It should also be noted that the works will continue to impact State significant archaeological resources and a number of conditions are recommended to manage this impact.

If approved, the following conditions are recommended:

- a) A heritage consultant experienced in heritage conservation works should work with the project team throughout the design development, contract documentation and construction stages of the project. The heritage consultant should be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, restoration, reconstruction, adaptive reuse, recording and demolition.
- b) The following elements of the proposal require further information to enable a proper assessment of heritage impacts. The EIS should be revised to provide the following information:
 - Detailed drawings for all new, prominent elements, such as staircases and elevators, throughout both buildings.
 - Further details regarding the proposed adaptation of the 'Strong Room' for use as a guest lounge in the Lands Building.
 - Diagrams showing the method of reticulating new services throughout both buildings.
 - Details showing the proposed modifications to significant balustrades in both buildings.
 - Further details regarding the proposed pool and spa in the Education Building.
 - Further details regarding the rooftop water "villa" on the Education Building.
 - Details of junctions between the exceptionally significant roof structures and the replacement roof.
 - Elevations showing proposed alterations to exceptionally significant roof structures at the Lands Building. It is recommended that alterations to significant fabric are minimised and that the new roof is designed so that it can be removed without permanent damage to the significant roof structures.
- c) A Schedule of Conservation Works for both buildings should be included as part of the EIS to guide the appropriate conservation of historic exterior and interior building fabric.
- d) Update the existing Maintenance Plan guiding the long term care of the building prior to issue of a construction certificate.
- e) A photographic archival recording of both buildings, carried out in accordance with the NSW Heritage Office publication: *Photographic Recordings of Heritage Items Using Film or Digital Capture*, should be submitted to the Heritage Council or its delegate prior to issue of a construction certificate.
- f) A Salvage Methodology should be prepared to address the storage and potential reuse of significant fabric proposed to be removed as part of the project. The Salvage Methodology should be submitted to the Heritage Council or its delegate for approval prior to issue of a construction certificate.
- g) Any potential adverse material impacts should be addressed in the final Construction Management Plan to ensure that potential damage to the buildings is avoided during construction.
- h) The Lands Building Movable Heritage Management Strategy prepared by Musecape, August 2013, should be updated into a Movable Heritage Collections Management Plan by an experienced movable heritage curator with a working knowledge of the site. The report should provide detailed recommendations on the appropriate ownership, future conservation, management, display conditions, storage, security, and identify the location and management of all movable heritage within the buildings. The Lands Building Movable Heritage Collections Management Plan should be submitted to the Heritage Council or its delegate for approval prior to issue of a construction certificate.

- i) The Movable Heritage Review of the Former Department of Education Building, 35 Bridge Street, Sydney, prepared by Musecape, June 2016, should be updated into a Movable Heritage Collections Management Plan by an experienced movable heritage curator with a working knowledge of the site. The report should provide detailed recommendations on the appropriate ownership, future conservation, management, display conditions, storage, security, and identify the location and management of all movable heritage within the building. The Lands Building Movable Heritage Collections Management Plan should be submitted to the Heritage Council or its delegate for approval prior to issue of a construction certificate.
- j) Tenancy Fitout Guidelines should be developed to advise retail/hospitality tenants of the cultural significance of the Lands Building and the requirements for its ongoing conservation and management. Any future works relating to the retail and food and beverage use will require approval under the *Heritage Act 1977*, unless deemed to be State Significant Development.
- k) Pre Works: A detailed Archaeological Research Design and Excavation Methodology undertaken by a suitably qualified and experienced historical archaeologist must be submitted to the Secretary of the Department of Planning and Environment for review and approval by the Heritage Council or its delegate prior to the commencement of any ground disturbing works on site.
- l) Pre Works: The name of a nominated excavation director suitable to satisfy the Excavation Director Criteria of the Heritage Council of NSW for the proposed activity for State significant archaeological sites must be submitted to the Secretary of the Department of Planning and Environment for review and approval by the Heritage Council or its delegate prior to the commencement of any ground disturbing works on site.
- m) During Archaeological Works: The Applicant must ensure the approved Excavation Director is present at the site supervising all excavation activity likely to expose relics. The Applicant must ensure that the approved Excavation Director takes adequate steps to record in detail relics, structures and features discovered on the site during the archaeological works in accordance with current best practice. This work must be undertaken in accordance with the NSW Heritage Office guidelines, 'How to Prepare Archival Records of Heritage Items' (1998) and 'Guidelines for Photographic Recording of Heritage Items' (2006).
- n) Final Excavation Report: The Applicant must ensure that a final excavation report is prepared by the approved Excavation Director, to publication standard, within one (1) year of the completion of the field based archaeological activity. Further copies of the report should be lodged with the City of Sydney library and the Heritage Division Library and another appropriate local repository in the area in which the site is located.
- o) Following Archaeological Works: The Interpretation strategies should be updated to include details of the archaeological investigation of the site and how the results will be incorporated into the completed development. Following completion the Interpretation Strategy must be submitted to the Secretary of the Department of Planning and Environment for review and approval by the Heritage Council or its delegate.
- p) Unexpected Historical Archaeology: The Applicant must ensure that if unexpected archaeological deposits not identified and considered in the supporting documents for this approval are discovered, work must cease in the affected area(s) and the Secretary of the Department of Planning and Environment and the Heritage Council of

NSW must be notified. Additional assessment and management must be confirmed with the Department of Planning and Environment to manage any such additional archaeological resources prior to works continuing in the affected area(s).

- q) Unexpected Aboriginal archaeology: The Applicant must ensure that if unexpected Aboriginal archaeological information is identified during the historic excavations the procedures recommended in the report 'Aboriginal Cultural Heritage Methodology and Methodology for Unexpected Aboriginal Archaeology' prepared by Curio Projects dated September 2016 will be followed.

If you have any further enquiries regarding this matter, please contact Nina Pollock, Senior Heritage Assessment Officer at the Heritage Division, Office of Environment and Heritage, on (02) 9873 8520 or nina.pollock@environment.nsw.gov.au.

Yours sincerely



Pauline McKenzie
Executive Director
Heritage Division
Office of Environment & Heritage

As Delegate of the Heritage Council of NSW

DATE 31st January 2017