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10 August 2020

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 design 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 9 Submission of SSD 7484 are largely consistent with the previous drawings submitted under Modification 4. The proposed design modifications, the subject of the S4.55 Application to Modify SSD 7484, are required because:

- The architectural and structural design has been further developed; and
- The confined ceiling cavities of the southern racetrack corridors must be altered to install essential services in a safe working environment.

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' heritage input to minimise adverse heritage impacts while providing 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 not listed on the National Heritage List, however, it 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 "Governors' Domain and Civic Precinct". The area includes many sites fronting Macquarie and Bridge Streets and beyond, including the Lands Building. To date the draft "Governors' Domain and Civic Precinct" Nominated place has not been gazetted.

## 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 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:

### **Statement of Significance:**

*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 submitted for this Modification 9 Submission of SSDA 7484 are largely consistent with the previous drawings submitted under Modification 4. The proposed modifications to the scope, the subject of the S4.55 Application to Modify SSD 7484, are required because:

- The architectural and structural design has been further developed; and
- The confined ceiling cavities of the southern racetrack corridors must be altered to install essential services in a safe working environment.

The key amendments can be summarised as follows:

- Reduced demolition and modification to the Northern Dome and Tempietti reflecting the updated design intent.
- Reduced demolition under the Strong Room on ground floor reflecting the investigations undertaken to assess its significance, fabric and the updated design intent.

- Reduced demolition of existing courtyard cast iron walkways or gantries to retain existing portions reflecting the updated design intent to allow for the heritage interpretation of the courtyard cast iron walkways.
- The reintroduction of previously existing openings around the building's entry spaces to promote public visibility at key points.
- Updated demolition extent of ground floor works reflecting subsurface services integration, landscape and paving works including grading works for drainage falls and provision of accessible routes.
- Salvaging and relocation of historic fireplaces reflecting coordinated services approaches and updated design intent ensuring all fireplaces remain within the building in locations where they historically were located.
- Removal of the southern arched corridor ceilings on Lower Ground, Ground and Level 1 to permit the removal and installation of new concealed services within the ceiling void. After extensive investigations, the much smaller void to the southern half of the building has been established to be unsafe to utilise in its current state and the solution to remove only this portion of the corridor ceilings was deemed to be a less intrusive and more sympathetic outcome for the building's longevity of use. It is vital that new services are located within this service void thereby eliminating the need to install intrusive services in the historic rooms located off the racetrack corridor. New arched ceilings to the same profile will be constructed in their place after the services have been integrated. The more ornate, vaulted arches and groin arches to the northern half of the building and to the corners of the corridors are proposed to be all retained.
- Removal and salvaging of the Strong Room shelving and mezzanines reflecting an updated design intent to utilise Level 2 of the Strong Room as a public function arrivals rooms for hotel guest functions thereby increasing public accessibility into this important space
- Updated demolition extents of the northern portions of existing heritage roofs to permit equitable public access from the two Tempietti into the Northern Dome reflecting further structural investigations that require the updated demolition to construct the new access and egress routes within the roof space. Two sets of the iron trusses will be retained on site and the nature of the original roof structure is addressed in the Freeman Ryan Interpretation Plan. It is noted that although the structure of the northern roofs needs to be rebuilt, the original external form, as seen from the public domain will be retained as well as the original, conserved cast iron terrace balustrade. Of particular merit, the north and south roofs will all be stripped of their later cladding and traditional slate roofing will be reinstated thereby recapturing the original appearance of the ancillary roofs from the public domain. It should also be noted that the original structure of the southern roofs is being retained.

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 main objective of this Heritage Impact Statement is to determine the heritage impact of the Stage 2 amended proposal. Overall the amended 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. On balance, the proposed modification to the amended Lands Building proposal will 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 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, all those aspects of the place that make a defining contribution to significance are being retained and protected. Any adverse impacts on fabric are outweighed by the broader meritorious outcomes of the amended proposal.

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 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 6.10.1 REPLACEMENT ANCILLARY ROOFS*

*Replacement ancillary roofs up to the height identified in the modification to the Stage 1 Approval SSD 6751 approved envelope are permissible.*

### *Policy 6.10.5*

*Any works to improve access to the roof level and above or introduction of new plant equipment should not be located where it adversely affects important views of the significant major roof features when seen from the public domain.*

### *Policy 6.11.1*

*It is permissible to further modify or replace the modified, ancillary linking roof structures provided that new elements are of architectural excellence, of superior materiality, are well articulated, that they maintain the visual prominence of the major roof features (including the southern clock tower, central Strong Room dome, northern dome, and eastern and western tempietti mansard structures) and result in increased amenity.*

### *Policy 6.11.3*

*Any new ancillary roof structures should be of contemporary design and be sympathetic to the significance and appearance of the historic building.*



*Policy 6.12.9*

*It is acceptable to alter or remove the modified cast iron walkways that currently access the modified toilet blocks.*

*However retain a sample portion of the structures in situ or on site as an interpretive initiative.*

*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.

## **CONCLUSIONS**

The proposed modifications will have an acceptable material 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 and structural design has been further developed; and
- The confined ceiling cavities of the southern racetrack corridors must be altered to install essential services in a safe working environment.

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 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 approved by SSD 7484.





## RECOMMENDATION

The proposed modifications will have an acceptable impact 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, appearing to be "Jonathan Bryant", written in a cursive style.

Jonathan Bryant  
**Director Heritage**

## ADDENDUM – 30 SEPTEMBER 2020

This addendum has been prepared to supplement the Heritage Impact Statement dated 10 August 2020, in response to a Request for Information from NSW Heritage following submission of Modification 9.

**Salvage methodology:** *A salvage methodology consistent with the requirements of Condition B49 of Stage 2 SSD 7484 and consistent with the revised scope of works is to be provided. The methodology must outline how all architectural elements and fabric which are to be removed as a result of Mod 9 are to be stored and reused within the Lands Building.*

**Comment:**

The approved Lands Department Building Salvage Methodology dated 14 May 2018 and prepared by Urbis is considered to address the roof truss fabric disturbed by the works outlined in Modification 9 and scheduled to be stored on site or disposed of. The demolition extent of trusses is a reduced scope compared to the original Stage 2 approved works that the approved Salvage Methodology addressed. We have amended the Salvage Methodology, in an Addendum, to address fireplaces and some limited Strong Room fabric.

**Southern ceiling service installation:** *details of the investigation which demonstrate that the ceiling cavity is unsafe and not fit for purpose are to be provided. An options analysis of alternative methods for service installation and details of why they were discounted are to be submitted.*

**Comment:**

The Hassell Response to Mod 9 RFI Lands Building demonstrates the investigations that have been carried out to address the installation of services in the southern portion of the building. Urbis considers that the preferred option will have the least adverse heritage impact in terms of the physical presentation of the place while providing a safe working environment. The additional demolition of the southern vault fabric is covered by the approved Lands Department Building Salvage Methodology dated 14 May 2018 and since added to with an addendum.

**Assessment of Strong Room Salvage and use as a function room:** *An assessment of the impact of the proposed use and modifications to the strong room against Policy 6.14.36 Spiral Staircases and Policy 6.14.40 Strong Room of the endorsed CMP are to be included in a revised Heritage Statement.*

**Comment:**

Because an ultimate end use and tenant of the Strong Room is currently unknown, our client has decided to revert to the demolition scope approved by Modification 4.

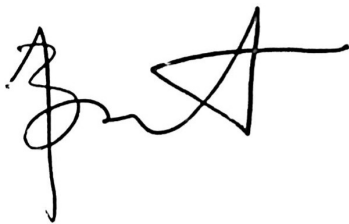
The modified scheme now complies with Policy 6.14.36 Spiral Staircases. For clarity it should be noted that recent investigations by Purcell indicate that the spiral staircase in the Strong Room is of recent date and of little significance. Nevertheless, the current intention, approved in Modification 4, is to retain this element in place.

The proposal, approved in Modification 4, is also considered to have the potential to be in accordance with Policy 6.14.40 Strong Room.

The only changes to the Strong Room scope, already approved in Modification 4, relate to essential modifications required to provide equitable access into the space. These changes are in accordance with Policies 6.18.1 – 6.18.5 of the endorsed CMP that relate to access. Without these changes the space will not be able to be used and while there are reversible adverse impacts on fabric, that is ultimately a poor heritage outcome. To this end the Milners 212 doors on the Strong Room will need to be carefully lifted off their hinges and mounted on the walls adjacent to their original locations. We have added an addendum to the Salvage Methodology to address the Milners 212 doors. The glazed timber doors leading from the Strong Room opening onto the staircase landings will also need to be removed and stored on site in accordance with the approved Lands Department Building Salvage Methodology dated 14 May 2018 and prepared by Urbis and since amended with an addendum.

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

Yours sincerely,

A handwritten signature in black ink, appearing to be "Jonathan Bryant". The signature is stylized, with a large, looped "J" and a long, horizontal stroke extending to the right.

Jonathan Bryant  
**Director Heritage**