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**Sent:** 28/01/2022 2:07:27 PM  
**Subject:** Submission re Development Application 2021/2257  
**Attachments:** National Trust Submission - Manly, 75 The Corso\_Final.pdf;

**Attention:**

Maxwell Duncan  
Development Assessment Officer

Dear Maxwell,

Please find attached a submission from the National Trust re DA 2021/2257. Please do not hesitate to contact should you wish to discuss our submission in more detail.

Kind regards,  
Jane



Jane Alexander

*Advocacy Manager*

**National Trust of Australia (NSW)**

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28 January 2022

Maxwell Duncan  
Development Assessment Officer  
Northern Beaches Council  
1 Belgrave Street  
Manly NSW 2095

By email: [Council@northernbeaches.nsw.gov.au](mailto:Council@northernbeaches.nsw.gov.au)

Dear Mr Duncan,

**National Trust submission relating to DA2021/2257**

The National Trust of Australia (NSW) makes comment on the above Development Application, and expresses our concern that a heritage listed building is proposed for demolition with little justification and without first assessing its significance.

The primary focus of the Trust is the proposed demolition of the building referred to in the documentation as the “Steyne Café” – a 1910, three storey building located to the north of the Steyne Hotel, which is included within the heritage listing for that building.

**Heritage Impact Statement**

The Heritage Impact Statement (p.9) for the proposal states that the building has a “low significant level of integrity internally and externally” and that it “never provided any cohesion in the streetscape.” This is a rather unkind assessment given that the photo of the building when constructed showed it has a clear relationship to its northern neighbor and obviously anticipated redevelopment to the south which was documented in 1913 redevelopment proposals for the hotel. The street elevation to the café Steyne building, while somewhat modified, is largely intact and certainly not beyond redemption and reinstatement of some original heritage details.



The subject building proposed for demolition (outlined) as pictured in 1910. It pre-dates the c.1936 remodeling of the Steyne Hotel and is one of a small number of early buildings to remain on South Steyne. (Source: Architectural Projects Conservation Management Plan with National Trust overlay).



### Heritage Listing of the site

The National Trust seek clarification on the heritage status of the Café Steyne building. Our assessment of the relevant planning documents indicate it is listed under the Manly Local Environmental Plan as Heritage Item No. I111, and is also included in the Manly Town Centre Conservation Area.



Map illustrating the subject site and its location within the Manly Town Centre Conservation Area (Source: <https://www.planningportal.nsw.gov.au>)

The Conservation Management Plan (p.16) does not appear to assess the building, yet it notes that:

*"The 3-storey building at No. 41 North Steyne (to the north) is part of the hotel site. This a Federation Free style building with a café to the ground floor, pairs of timber shingled projecting balconies above, and a tall parapet featuring semi-circular blind arches. **This building is not heritage listed and is outside the Manly Town Centre Heritage Conservation Area.**" (our emphasis).*

The Heritage Impact Statement (p.7) by the same consultants would appear to contradict this claim that the building is not listed:

*"The site of the Hotel Steyne is a composite of three buildings, the original 1936 building, the 1941 building and the 1910 building... The site, comprising the 1936 and 1941 buildings, is listed on the Manly Local Environmental Plan as Heritage Item No. I111. **The 1910 building Steyne Café, which is part of the site, is a part of the Heritage Item listing** (our emphasis) but does not contribute to its significance and is not noted in the inventory sheet."*

Much has been made in the Heritage Impact Statement (p.10, sic) that *"no elements and finishes in 1910 Building Steyne Café are described in Section 5.10. The 1910 building Steyne Café is not mentioned in the heritage inventory sheet."*

The National Trust would respectfully suggest that the fact that the 1910 Steyne Café building is not mentioned in the inventory sheet is not a reason to suggest that it can be demolished. The Trust has long-maintained that just because a building is not on a heritage list does not mean it is without heritage value. Here, however, we have a building that is in fact listed – and strongly suggest that now would be an important time to review that list and actually assess the building and revise the inventory sheet for the Hotel Steyne if required, and produce a separate one for the Steyne Café building if desired.



### Streetscape character and heritage contribution

The character and significance of the *Manly Town Centre Heritage Conservation Area* are outlined in the Manly DCP, an excerpt of which is shown below:

#### **5.1.1.1 Statement of Significance for Manly Town Centre Conservation Area**

*The Manly Town Centre Conservation Area is of local heritage significance as a reflection of the early development of Manly as a peripheral harbor and beachside village in the fledgling colony of New South Wales. This significance is enhanced by its role as a day-trip and holiday destination during those early years, continuing up to the present time, and its association with H G Smith, the original designer and developer of the Manly Town Centre Conservation Area as it is today. **The physical elements of the Manly Town Centre Conservation Area reflect this early development (our emphasis) and its continued use for recreational purposes, most notably the intact promenade quality of The Corso and its turn of the century streetscape, as well as key built elements such as hotels, and remaining original commercial and small scale residential buildings (our emphasis).***

*The many historic vistas which remain to this day enhance the visitor experience of the Manly Town Centre Conservation Area and assist with providing an interpretation of the Manly Town Centre Conservation Area as it has changed over time.*



The current Streetscape, from the same viewpoint as the 1910 image shown earlier. The Café Steyne building is clearly seen. (Source: Google Maps)

The Corso in particular is a place of historic integrity and is a large component of why this place in particular continues to have heritage significance. As the Manly DCP states (5.1.2), *“this significance has been recognised via listings as Items of the Environmental Heritage in the LEP... These listings place a responsibility on Council, land owners and applicants to maintain the significance of the ‘greater whole’ of both The Corso and the Manly Town Centre Conservation Area.”*

The DCP’s Statement of Significance for The Corso is relevant to this application:

*The Corso is a most impressive formal street, with a central avenue planting of mature Phoenix palms and Moreton Bay figs. **It has its own unique streetscape shaped by an uncommon grouping of fine late 19 century to early 20 century buildings. Despite varying levels of intactness and some less aesthetic and sympathetic development, the group as a collective whole contributes to the historic streetscape (our emphasis).***





## Heritage Approach

The National Trust acknowledges that our cities are not best-served by being “time capsules”, and we note that other DCP guidelines (eg: 5.1.2.14) for The Corso speak to the fact that new buildings will of course be constructed over time and that these should be of a “contemporary design idiom”.

The starting point for consideration of this proposal should, however, not be whether or not the new building is of an appropriate scale or design quality, but rather whether it should replace an earlier building with acknowledged heritage significance and listed heritage protection.

The DCP’s Heritage Guidelines for The Corso state that:

- 5.1.2.1 *Most existing buildings are significant and are to be conserved, not redeveloped;*
- 5.1.2.2 *Internal changes are important;*
- 5.1.2.3 *Significance is more than the depth of a façade: thus new development is to be to the rear;*

Indeed, the list of heritage guidelines for The Corso starts with this premise:

**5.1.2.1 Most existing buildings are significant and are to be conserved, not redeveloped**

- a) *The only exceptions are in respect to buildings identified in Schedule 6 – The Corso: Site Specific Controls as may be able to accommodate redevelopment.*

**Existing street facades, including all original detailing, are particularly important and are to be maintained** (our emphasis). *This includes original framing details and materials to windows, doors and other openings. Original details missing or removed should be reinstated and unsympathetic additions removed* (our emphasis). *Appendix 6 lists requirements and suggestions.*

## Conclusion

Across NSW, our heritage is constantly under threat and conservation areas have been proven as the most effective way to not only protect our heritage buildings but also their context and settings. This building would appear to be a contributory element of the Manly Town Centre Conservation Area and, with appropriate conservation and repair, could continue to contribute to maintain the significance of that area.

The National Trust would argue that the heritage significance of the Café Steyne building proposed to be demolished has not been properly established or assessed, and that the relevant provisions and guidelines that are applicable to the heritage listed site must help guide any future proposal for this site. We urge Council to consider this proposal in that context.

Yours sincerely,

David Burdon  
Director, Conservation