

Heritage Referral Response

Application Number:	DA2022/1000
Date:	23/11/2022
To:	Jordan Davies
Land to be developed (Address):	Lot 100 DP 1276056 , 19 - 21 South Steyne MANLY NSW 2095

Officer comments

HERITAGE COMMENTS
Discussion of reason for referral
<p>This application has been referred as the site contains a local heritage item, being Item I245 - The Drummond Far West Home, 22 Wentworth Street, Manly, which is listed in Schedule 5 of Manly Local Environmental Plan 2013.</p> <p>The site is also within the vicinity of a number of heritage items, including:</p> <p>I174 – Beach Reserve – Merret Park, North Steyne and South Steyne I224 – Public Shelters – South Steyne and North Steyne I226 – House at 15-16 South Steyne (also known as The Terraces) I241 – Residential flat building, 29 Victoria Parade I242 - Residential flat building, 31 Victoria Parade I243 - 1920's school building, 10 Wentworth Street I244 – Former School of Arts, 12 Wentworth Street I246 – Street Trees – Wentworth Street</p> <p>The site is also within the vicinity of C2 - Town Centre Conservation Area</p>
Details of heritage items affected
<p>Details of the main heritage item affected, as contained within the Heritage Inventory, are:</p> <p><u>Item I245 - The Drummond Far West Home, 22 Wentworth Street, Manly</u> <u>Statement of Significance</u></p> <p>This building is a good example of Inter-War Classical style in a building with state historical significance for its role as a charitable institution.</p> <p><u>Physical Description</u></p> <p>Three storey Inter-War Classical style building. Cream brick institutional building with tile roof. Wide colonnade ground floor. Paired Doric columns to first and second floor balconies. Contrasting brickwork used as highlight to arches on ground floor and in horizontal bands.</p> <p>The Drummond Far West Home is a three-storey brick and concrete building located on the south side of the street. The building is symmetrical about the main entry. The ends of the front façade are terminated with projecting rooms on the First and Second Floors containing large sliding timber framed windows that provided sheltered sunrooms and the Ground Floor arcade projects to support the sunrooms.</p> <p>The Ground Floor verandah is shaded by an arcade of arches in the face brickwork. The entry is defined by a projecting porch with brick side walls, concrete Doric columns in the opening and rendered moulded cornice. The First and Second Floor verandahs have four pairs of Doric columns dividing the verandahs into five bays. Between the pairs of columns are the original low wrought steel handrails. The original angled tops have been removed and modern glass balustrades have been installed behind the wrought steel balustrades.</p> <p>The windows are timber framed and the main entrance doors are a pair of timber and glass doors</p>

given a horizontal emphasis by the omission of any vertical glazing bars – there being only horizontal glazing bars.

The floor levels are defined with projecting painted rendered moulded cornices and the lintels over the sunroom windows are also rendered and painted. The original unpainted face bricks have now been painted and the original contrast between the painted Second Floor and unpainted Ground and First Floors has now been lost.

Other relevant heritage listings

SEPP (Biodiversity and Conservation) 2021	No	Comment if applicable
Australian Heritage Register	No	
NSW State Heritage Register	No	
National Trust of Aust (NSW) Register	No	
RAIA Register of 20th Century Buildings of Significance	No	
Other	No	

Consideration of Application

Background

This application responds to a Concept Approval (MP 10_0159) which was approved for the site in 2013 and which was amended in May 2022. Heritage raised a number of concerns with the proposed amended concept, and after discussions with the applicants, the main heritage objections were resolved.

Proposal

This application provides for the detailed design of the Royal Far West site, in accordance with the approved Concept Plan (Approved 2013 and amended May 2022).

The application proposes a major mixed use redevelopment of the land holding owned by Royal Far West, on the corner of Wentworth Street and South Steyne. It proposes demolition of all buildings on-site, with the exception of the existing CCK building on Wentworth Street and retention of the front part of the heritage listed Drummond House building, which faces Wentworth Street. It also proposes construction of three new buildings containing residential, commercial and retails uses, with basement parking and landscaping works. The overall building envelope is approved by the original Concept Approval (as amended in 2022), with this DA providing the detailed design.

Heritage Comment

Major heritage concerns were raised in response to the Concept Approval modification, as the concept had shifted from retaining all of heritage listed Drummond House, to only retaining the front bay facing Wentworth Street. After discussions with the applicant this overall objection to extra demolition of the heritage item was removed, after modifications were made to the plan to enable the remaining portion of Drummond House to be more appreciated and understood from Wentworth Street.

These comments are based on the latest amended plans submitted for this application on 16 November 2022.

The updated **Heritage Impact Statement (HIS)** by URBIS, dated 14 October 2022 has also been reviewed. It concludes that *"the proposal is considered to have an acceptable heritage outcome..."* and that

"The potential heritage impacts of the removal of the rear wing fabric of Drummond House and development of two buildings in the immediate vicinity are substantially outweighed by the benefits

provided by the new facilities, which would allow the important charitable operations of Royal Far West - which are of state significance - to continue at the subject site."

The HIS recommends the following conditions of consent, which are all agreed with:

- Preparation of a Photographic Archival Recording prior to CC;
- Engagement of heritage consultant for all stages of project until completion;
- Preparation of a Schedule of Conservation Works prior to CC; and
- Preparation of a Heritage Interpretation Plan, prior to CC.

The application was also supported by a **Conservation Management Plan (CMP)**, also by URBIS, dated 20 November 2020. This CMP identifies the fabric of the rear wings of Drummond House, which are to be demolished, as having Little Significance, with only the front wing identified as having Moderate Significance. Interiors, having been extensively altered over the years, are graded as having Little or Neutral Significance. Original timber framed windows and doors have Moderate Significance with later replacements Neutral.

While Heritage does not agree with these gradings of fabric significance, the proposal is in accordance with the approved Concept Plan which shows demolition of the rear bays of Drummond House. Therefore, these comments are focused on how to achieve the best outcome for the portion of Drummond House which is to remain. Council also requested that the CMP be updated to include policies relating to moveable heritage, as it was silent on this category of heritage, which is relevant due to the fact that Royal Far West have occupied the site since the 1920's. An updated CMP was not submitted with the application.

Changes to Drummond House

As mentioned, demolition of the majority of this heritage item was approved by the modification of the Concept Plan in May 2022. The plans state that there will be "*Refurbishment works to Drummond House to Heritage Architect approval*", but with little specific detail. There is also a lack of detail around the design of the entry vestibule, landscaping in front of Drummond House and proposed materials, finishes and colours (including the roof replacement).

All internal walls and also the rear walls of the front bay are proposed to be demolished, leaving only the shell of the front of the Inter War Free Classical building. It is essential that this demolition be guided by a structural engineer to ensure that no harm comes to that part of the building which is to remain - during demolition, excavation and construction. It is noted that the application was supported by Civil and Structural Comments from James Taylor & Associates (dated 10 June 2022), which concluded that "*We are satisfied that the integrity of Drummond House can be maintained throughout the excavation, construction and afterwards.*" More details of how this will be done are required.

The new construction behind Drummond House has been reduced in width and set back, so that it is largely contained behind the front portion, which now allows for part of the original form of Drummond House to be viewed and appreciated from Wentworth Street. This combined with the larger angled setback of Building C (than in previous concepts), means that more of the original form of Drummond House will be visible from the public domain, especially when viewed from the beachfront. However, the western side context will be affected by the design of the entry vestibule and further details are required to ensure this does not have an adverse impact on the significance of Drummond House.

It is noted that the existing fence in front of Drummond House is to be removed, which is supported, along with the removal of the existing timber screen facade element between the CCK building and

Drummond House.

There is little detail provided on materials, colours and finishes for the proposed changes to Drummond House, apart from statements that refurbishment works will be done with Heritage Architect approval. Full details of all materials, colours and finishes affecting Drummond House and the larger development, will be required to be submitted to Council's heritage officer for approval prior to the issue of a CC. This will include the proposed re-roofing of the heritage building, for which details have not been provided. There is also some confusion about the treatment of the front facade of Drummond House. The architectural plans state that the paint is to be removed on the lower 2 stories, if the bricks are in an acceptable condition, however the HIS states that *"It is not proposed to alter the existing painted facade of Drummond House, however opportunities to recycle brickwork, strip back paint to the original facebrick and apply a different painted colour palette may be explored in the future."*

Due to the lack of detail provided on the refurbishment of Drummond House, a condition will also be imposed requiring the preparation of a detailed *Schedule of Conservation Works*, submitted for approval prior to issue of a CC. An additional condition will be imposed requiring the appointment of a heritage architect/consultant to supervise all works affecting heritage fabric, during construction.

There is also a lack of detail on the Landscape Plans by Jane Irwin Landscape Architecture (dated 18 November 2022), which refers to *"new Drummond House front planting to compliment heritage building"*, without providing any specifics. Details will need to be submitted to Council's heritage officer for approval. No details are shown of a replacement fence. Should one be proposed, full details will need to be submitted to Council's heritage officer for approval.

As mentioned, there is a lack of detail for the entry vestibule shown on the plans adjacent to the western side of Drummond House. Further details should be submitted showing the relationship and integration of this area with the fabric of Drummond House.

There are also no details of the illuminated sign proposed for the front of the CCK building. Given its size and the proximity of this sign to Drummond House, further details need to be submitted for review.

Impact on heritage items in the vicinity

15-16 South Steyne

The site adjoins the heritage listed Victorian terraces at 15-16 South Steyne which currently sits beside the 4 storey WOTSO building. While the proposed new building is of a similar, slightly higher scale to the existing building, it is agreed that the new building will present an improved streetscape design response and therefore will not have a more adverse impact on the heritage building than exists currently. The new building is set back as required by the Concept Approval.

29 and 31 Victoria Parade

The site also adjoins heritage listed residential flat buildings at 29 and 31 Victoria Parade, adjoining the western boundary of the site. Again, setbacks are provided between these heritage buildings and the new buildings. Building C will be located adjacent to these heritage buildings, as approved by the Concept Approval. The setbacks and proposed landscaping will provide some visual relief between the new development and these heritage items. While the new buildings, in particular Building C, will change the context of these heritage buildings, it is agreed that this is an acceptable heritage impact, given the location in the town centre of Manly.

10 and 12 Wentworth Street

The site also adjoins heritage items at 10 and 12 Wentworth Street, however given that the recent CCK building already separates these heritage items from Drummond House, there will be no

increased impact.

Street trees - Wentworth Street

The street trees in Wentworth Street are also heritage listed. There are 3 heritage listed Norfolk Island Pine trees located adjacent to the site, one near South Steyne and the other two located to the east and west of Drummond House. These trees must be protected at all times during demolition, excavation and construction. It is noted that proposed Landscape conditions will ensure that these heritage listed trees are protected.

Beach Reserve and Shelter sheds

The beach reserve with Norfolk Island pine trees and the shelter sheds are also heritage listed. It is not considered that the proposal will have an adverse heritage impact, taking into account the Concept Approval.

Impact on Town Centre Conservation Area

The site is located in the vicinity of the Town Centre Conservation Area, which in this area is located along The Corso and Darley Road. It is considered that there will be no adverse impact upon the significance of this conservation area as a result of this development.

Other matters

Given that the majority of a listed heritage building is being demolished as part of this proposal, it is essential that a thorough and detailed *Photographic Archival Recording* is made of Drummond House (inside and out, including any moveable heritage), along with its setting within the greater Royal Far West site.

Additionally, as the site is of state significance for its association with the work of the Royal Far West, a *Heritage Interpretation Plan* is also required, so that the history of the whole site is interpreted in the new development. There should be a specific Heritage Interpretation Plan for Drummond House and also one for the wider development. These Heritage Interpretation Plans should include any items of moveable heritage remaining in-situ or being relocated on-site.

Conclusions

In light of the approved Concept Plan, the proposal is considered to have an acceptable impact upon the heritage significance of Drummond House, subject to careful management of excavation/construction works and the implementation of appropriate refurbishment works, including the use of appropriate materials, colours, finishes and landscaping. It is also considered to have an acceptable impact upon the heritage items adjacent to the site and in the vicinity.

Therefore, the proposal can be supported on heritage grounds, subject to the imposition of conditions:

Prior to Construction Certificate

- Heritage Interpretation Plans
- Photographic Archival Record
- Supervision by Heritage Architect/Consultant
- External finishes, materials and colours
- Detailed Schedule of Conservation Works
- Landscaping - Wentworth Street in front of Drummond House
- Entry vestibule design - Drummond House
- Update of Conservation Management Plan - Drummond House
- Structural engineering advice - Drummond House
- Illuminated sign - Wentworth Street

During Works

- Exposure of bricks - Drummond House
- Archaeological finds

Prior to Occupation Certificate

- Implementation of Heritage Interpretation Plans

Consider against the provisions of CL5.10 of MLEP 2013:

Is a Conservation Management Plan (CMP) Required? Yes Has a CMP been provided? Yes

Is a Heritage Impact Statement required? Yes Has a Heritage Impact Statement been provided? Yes

Further Comments

NOTE: Not all conditions could be pre-filled in the conditions section, as there were not enough Prior to CC blank conditions available. Therefore, 5 x Prior to CC conditions have been pre-filled as well as 2 x During Works and 1 x Prior to OC conditions.

The remaining 5 x Prior to CC conditions are listed below and **MUST be added to any Notice of Determination.**

Prior to Construction Certificate

Landscaping - Wentworth Street, in front of Drummond House

Details of proposed landscaping in front of Drummond House (including any fencing) are to be submitted to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate. Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that landscaping in front of Drummond House is sympathetic with its aesthetic heritage significance.

Entry Vestibule Design - Drummond House

Details of the design of the entry vestibule, located adjacent to the western side of Drummond House, are to be submitted to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that the entry vestibule does not adversely impact upon the aesthetic significance of Drummond House.

Update of Conservation Management Plan - Drummond House

The Conservation Management Plan for Drummond House (Urbis - 20 November 2020), is to be updated to include consideration of, and policies for, the protection of moveable heritage. The updated Conservation Management Plan is to be submitted to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate.

Reason: To ensure that the Conservation Management Plan for Drummond House is comprehensive.

Structural Engineering Advice - Drummond House

A report is to be submitted which details how the remaining portion of Drummond House is to be structurally supported and protected during demolition, excavation and construction. This report is to be prepared by a suitably qualified structural engineer and submitted to Council's Heritage Officer,

prior to the issue of a Construction Certificate.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that the remaining heritage item structure is not damaged during any works.

Illuminated Sign - Wentworth Street

Further details of the illuminated sign on the CCK building fronting Wentworth Street are to be provided to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate. Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that the sign does not adversely impact upon the significance of Drummond House.

The proposal is therefore supported.

Note: Should you have any concerns with the referral comments above, please discuss these with the Responsible Officer.

Recommended Heritage Advisor Conditions:

CONDITIONS TO BE SATISFIED PRIOR TO THE ISSUE OF THE CONSTRUCTION CERTIFICATE

Photographic Archival Record

A photographic archival record of the is to made of Drummond House (including interiors and exteriors) as well its setting within the overall Royal Far West site. This archival record is to also record any items of moveable heritage, prior to their removal for storage or relocation.

This record is to be prepared generally in accordance with the guidelines issued by NSW Heritage and must be submitted to Council's Heritage Officer for approval, prior to the commencement of any demolition or works on-site.

The photographic record should be made using digital technology, submitted on archival quality CD-R disc, and should include:

- Location of property, date of survey and author of survey;
- A site plan at a scale of 1:200 showing all structures and major landscape elements;
- Floor plans of any buildings at a scale of 1:100;
- Photographs which document the site, cross-referenced in accordance with recognised archival recording practice to catalogue sheets. The extent of documentation will depend on the nature of the item.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To provide an archival photographic record of this heritage item, prior to commencement of any demolition or works.

Supervision of works by Heritage Architect/Consultant

All works are to be supervised by an experienced heritage architect/consultant, to provide ongoing advice throughout the construction of the project. The appointed architect/consultant is to be involved in the resolution of all matters where significant fabric and spaces are subject to demolition and adaptive reuse. The heritage architect/consultant is to be available throughout the construction process to respond directly to Council when issues relating to heritage require clarification or resolution. They are also to ensure that the policies outlined in the Conservation Management Plan for Drummond House are adhered to and the approved Schedule of Conservation Works for Drummond House is followed.

Details of the appointment of this heritage architect/consultant are to be submitted to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate. Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that all matters relating to significant fabric and spaces are guided by heritage conservation best practice, the Conservation Management Plan and the approved Schedule of Conservation Works.

Heritage Interpretation Plans

A Heritage Interpretation Plan is to be prepared for the whole Royal Far West site, to interpret the strong social and cultural significance of the use of this land by Royal Far West since the 1920's.

A separate Heritage Interpretation Plan is to be prepared specifically for Drummond House, to interpret this heritage item, its historical role in the work of the Royal Far West as well as its aesthetic significance as an example of the Inter War Free Classical architectural style.

Both Interpretation Plans must be prepared by a suitably qualified consultant in accordance with the Heritage NSW guidelines "Interpreting Heritage Places and Items" and must be submitted to Council's Heritage Officer for approval prior to issue of a Construction Certificate. These Plans must include strategies which are to be implemented as part of the approved development.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that the historical and cultural significance of the site is recognised and interpreted as part of the development of the whole site, as well as incorporated into the refurbishment of Drummond House.

External finishes, materials and colours

Full details of external finishes, materials and colours, for Drummond House and Buildings C and D, are to be submitted to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure compatibility with the architectural significance of Drummond House and its setting as well as compatibility with adjoining heritage items.

Detailed Schedule of Conservation Works - Drummond House

A detailed Schedule of Conservation Works is to be prepared for all proposed works to Drummond

House. This Schedule is to be prepared by a suitably qualified and experienced heritage architect/consultant and is to be submitted to Council's Heritage Officer for approval, prior to the issue of a Construction Certificate.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that all conservation works to Drummond House are carried out in accordance with an approved Schedule of Conservation Works.

CONDITIONS TO BE COMPLIED WITH DURING DEMOLITION AND BUILDING WORK

Exposure of bricks - Drummond House

In accordance with the architectural plans, the paint is to be removed from the bricks of the ground and 1st floor level facade of Drummond House. This work should be carried out under the supervision of the appointed heritage architect/consultant. A test should be initially carried out to ensure that the bricks will not be damaged by the process. If it is determined that removing the paint would be detrimental and damaging to the original brick fabric, then evidence should be provided to Council's Heritage Officer. Consideration should also be given to also removing the paint on the 2nd floor, based on advice from the appointed heritage architect/consultant.

Reason: To ensure that the conservation works to Drummond House are authentic to its original architectural character.

Archaeological finds

Should any archaeological finds be uncovered during demolition/excavation, work is to stop and notice given to the appointed heritage architect/consultant for review and advice as to whether any statutory notices are required under the Heritage Act, 1977 or other Acts. Council's Heritage Officer should also be notified.

Reason: To ensure that any archaeological finds are dealt with appropriately and in accordance with relevant legislation.

CONDITIONS WHICH MUST BE COMPLIED WITH PRIOR TO THE ISSUE OF THE OCCUPATION CERTIFICATE

Implementation of Heritage Interpretation Plans

The approved Heritage Interpretation Plans (for the whole site and for Drummond House) must be implemented to the satisfaction of Council's Heritage Officer prior to the issuing of the Occupation Certificate.

Details demonstrating compliance with this condition are to be provided to the Principal Certifying Authority.

Reason: To ensure that the historical and cultural significance of the site is recognised and interpreted as part of the development of the site.