

2 December 2022

HPS Reference: 2021053

The General Manager
Northern Beaches Council
PO Box 82
MANLY NSW 1655

Dear Sir,

**NORTHERN BEACHES LOCAL PLANNING PANEL (NBLPP) – ITEM 5.1
DA 2022/0643 – 19-23 THE CORSO, MANLY – ALTERATIONS AND ADDITIONS TO THE EXISTING BUILDING
TO ALLOW FOR SHOP-TOP HOUSING AND A PUB**

We refer to the aforementioned development application to be considered in closed session on Wednesday 7 December 2022.

We would like to thank the Council staff for their efforts in relation to this application and are pleased with the recommendation for approval of this application.

The following submission relates to proposed Condition 17 of the draft conditions of development consent, which states as follows:

17. Interpretation of original layout

The original layout of the existing building at 19-21 The Corso is to be reflected in the new layout configuration by the retention of the wall nibs -300mm minimum and the retention of the existing ceilings and cornices, where the original walls are proposed to be removed. Details demonstrating compliance with this condition are to be submitted to the Council's Heritage Advisor for approval prior to the issue of the Construction Certificate. Reason: To allow the interpretation of the original room layouts of the existing Inter-War flat building "The Exeter Flats".

We have a number of concerns relating to this conditions.

The Applicant accepts, and agrees with, the importance of acknowledging the significance of The Exeter Flats as an existing Inter-War flat building, which includes the opportunity to interpret the original layout of the rooms as part of this contemporary adaptive reuse of the building. However, as identified in Section 5.1 of the Heritage Impact Statement prepared by City Plan Heritage, the existing layout is not the original layout, as follows:

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Internally, the apartment building has undergone various alterations and the interior has been modified to accommodate the contemporary requirements and changing nature of visitor accommodation. The interior is entirely comprised of later additions with carpet and tiled flooring, wall finishes, aluminium framed windows, facets of kitchen and bathrooms in the apartments, and fire safety equipment. The internal staircase connecting with the upper levels appears original with the timber windows alongside the south-eastern façade. The reconfigured internal layout provides little to no evidence of the original detailing with a labyrinth-like later configuration. Therefore, the integrity of the interiors of the building is considered to be low with primarily non-original finishes. [Our emphasis]

In addition, one of the fundamental drivers for undertaking this application is to ensure that equitable access is available within the building, through the implementation of a lift to service all levels and that openings are of sufficient size to allow for equitable access. There is concern that, by seeking the retention and/or recreation of the nib walls, will result in:

1. the openings within the building precluding equitable access, as intended
2. potentially affecting those with a disability related to vision impairment
3. potentially impacting the ability to achieve the adaptable apartment layout as required by the NSW ADG
4. potentially impeding safe egress during the event of an emergency, such as fire.

The retention and/or replacement would defeat the purpose of the building upgrade to current fire safety and equitable standards, which were the precursors to this application.

In addition to the concerns regarding equitable access and safety, the retention of these is also likely to affect logical furniture placement and thus erode the amenity of these apartments, again a key driver to the refurbishment of this building.

In addition, the Applicant also raises concern with the need to retain the existing ceilings and cornices where the original walls are proposed to be removed as this is not a matter previously contemplated at any stage of the application, through the pre-lodgement application meetings and the subsequent three meetings after the application was lodged by the Council. It was not a matter raised by the Council's heritage team during all of these stages, nor by the Design Review Panel who have considered this application in detail. The intent of the purpose of this is unknown.

Given the concerns raised, the Applicant would request consideration to an amended condition which allows for an alternative approach to the interpretation of the original layouts of the existing Inter-War flat building, as follows:

17. Interpretation Plan



Prior to issue of a construction certificate, a Heritage Interpretation Plan is to be submitted for approval by Northern Beaches Council to acknowledge the heritage of the development site as a whole providing policies, strategies, and detailed advice for interpretation of the original room layouts of the existing Inter-War flat building "The Exeter Flats".

It is to be based on research, analysis and plans to communicate the significance of the place to the intended audience. Interpretation may be a combination of the treatment and fabric of the place, the use of the place, and the use of interpretative media, such as events, activities, signs and publication.

The Interpretation Plan should identify key themes, storylines and audiences and provides recommendations about interpretation media to be located within the common lobby of the 'Exeter Flats'.

The Heritage Interpretation Plan should be prepared by a suitably qualified consultant in accordance with NSW Heritage Council guidelines Interpreting Heritage places and Items (2005) and Heritage Interpretation Policy (2005), and overseen by a member or associate of either Interpretation Australia or ICOMOS International Scientific Committee on Interpretation and Presentation of Historic Sites (ICIP).

Reason: interpretation of the original room layouts of the existing Inter-War flat building "The Exeter Flats" and overall development site.

We appreciate the NBLPP consideration of the above position in its determination of this matter.

Yours sincerely,



Kristy Hodgkinson
Director

