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HERITAGE IMPACT STATEMENT

Royal Far West, Manly

Prepared for
ROYAL FAR WEST
22 July 2021

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director, Heritage	Jonathan Bryant, B Sc Arch (Hons), B Arch Hons, M Herit Cons, M. ICOMOS		
Associate Director, Heritage	Ashleigh Persian, B Property Economics, G Dip Herit Cons, M. ICOMOS		
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EXECUTIVE SUMMARY

Urbis has been engaged by Royal Far West to prepare the following Heritage Impact Statement for proposed alterations and additions to the Royal Far West Manly property that the corner of Wentworth Street and South Steyne at Manly.

The subject site includes one heritage item known as Drummond House, and the site adjoins a number of heritage items of local significance.

It is proposed to amend the Part 3A Concept Approval (Application # MP10_0159) under this Section 75W Application, which includes alterations and additions to Drummond House and the construction of mixed use buildings which incorporate tourist and visitor accommodation, residential apartments and retail/ commercial uses with basement parking and landscaping.

Accordingly, a heritage impact statement is required to assess the potential heritage impacts of this proposal on the subject site including Drummond House, and the vicinity heritage items and conservation areas. The assessment has had regard to the updated Conservation Management Plan for Drummond House prepared by Urbis in 2020.

The subject proposal seeks to amend the Part 3A concept envelope approval. This will facilitate future development including demolition and construction of new buildings. Accordingly, our assessment has been prepared with consideration for the future built works that the concept modification will facilitate.

Overall, the proposal is considered to have an acceptable heritage impact for the following reasons:

- Non heritage listed buildings to be demolished include the Royal Far West School (three storey brick building) and the WOTSO brick and concrete building to South Steyne. These two buildings are later twentieth century structures which require updating or replacement to provide adequate facilities for the Royal Far West institution. Neither of these buildings are heritage listed and they are not required to be retained on heritage grounds.
- Drummond House (a listed heritage item) is a highly modified inter-war building which has been subject to numerous rounds of major changes over the years. The original form and fabric of the building is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations.
- Royal Far West who has operated on the subject site for in excess of 95 years, has advised that the current buildings, and in particular Drummond House, are not fit for use. This proposal has been prepared to provide for a particular and highly sensitive use which includes the protection of vulnerable children. The provision of upgraded and fit-for-purpose facilities is critical to the continued operation of Royal Far West as a place of respite and security. As the primary heritage significance of the place is vested in its State-significant long term operation as a charitable institution, the proposal is considered acceptable and appropriate from a heritage perspective as it safeguards these operations allowing them to continue into the future and adapt as required to meet the evolving demands of this important institution.
- The rear wings of Drummond House will be demolished as part of this development for a number of reasons; they are not fit for purpose to support the significant charitable use of the place; they have been highly modified and provide a confused internal configuration; the subject site is being excavated to provide for underground parking and demolition of the rear wings is required to facilitate this use; and the existing outdoor play areas are insufficient to support the special needs of the children and families being supported by Royal Far West and the rear wings of Drummond House are an ideal location to provide a safe and secure outdoor environment for clients. This demolition removes fabric of secondary importance compared with the front principal wing form, which is generally the only area of the building to still demonstrate the Inter-War Classical style of the place (albeit, also highly modified). The rear wings of Drummond House, proposed for removal, are not required to be retained in order to understand and appreciate the identified heritage significance of the place, being its State-significant function as a charitable institution and its representative value as an Inter-War Classical style, evidenced primarily in the principal elevation. The revised CMP grades this rear wing fabric as having 'Moderate Significance'

only, and as such the removal of this fabric will not affect any fabric of Exceptional or High heritage significance.

- The proposal including the new rear additions to Drummond House, the internal adaptive reuse of Drummond House and the new buildings on the site have been designed by two of Australia's preeminent architects, Glenn Murcutt and Angelo Candalepas, and represents a high degree of design excellence. The proposal is finely detailed and carefully considers the heritage context within which the new buildings sit, and having regard for the calibre of the architects involved in this important charitable institution proposal, the proposal has been carefully considered and represents an important addition to the streetscape and the architectural layering of Manly. We also consider that the new work, of design excellence, is very likely to be recognised as an important historic layer in the future.
- The proposed extensions, additions and new buildings are wholly contemporary in their design and materiality, however have been designed to respond to the character of the precinct and the adjoining heritage items. The buildings will incorporate contemporary materials such as concrete and brass or bronze cladding which respond to the masonry materiality of the immediate heritage items including Drummond House and the Victorian building on South Steyne to the south of the site. The new buildings and additions will not replicate traditional or significant detailing or design, retaining a sense of hierarchy across the site and along the streetscape which provides an understanding of the various periods of development.
- The proposed new rear additions to Drummond House have adopted a rhythmic wing form that interprets the wing form of the fabric proposed for demolition. This approach allows for an understanding of and sympathetic response to the original design and form of the building while still being able to facilitate the proposal and retaining the highly significant front portions of Drummond House.
- No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed. While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.
- Along Wentworth Street, the proposal site adjoins the Former School of Arts at 12 Wentworth Street (Item 244). However, it is noted that a new building has been constructed at 18 Wentworth Street as part of the previous approval for the subject site and provides a visual and physical barrier between the heritage item and Drummond House. The new development on South Steyne adjoining the heritage item (Item 226), a Victorian house at 15–16 South Steyne, effectively replaces an existing late twentieth century concrete building with a new development with a more consistent streetscape response. This new building is setback from the Victorian heritage item to provide appropriate distancing. There is no marked change in terms of heritage impact on the Victorian item between the existing building to the new building, apart from an improved streetscape response in design and amenity. The buildings are of a similar scale and the new building provides a larger setback from the heritage item, and is therefore considered to provide an overall improved heritage outcome.
- The subject site is also located in the vicinity of the C2 Town Centre Conservation Area which is significant for its ability to demonstrate the development of the beach-side town centre. The proposal will not impact adversely on any of the heritage values associated with this conservation area.

Overall the proposal is considered to have an acceptable impact and is strongly recommended for approval from a heritage perspective. The design has evolved in response to Council's preliminary feedback to address and manage potential concerns and the proposed scheme is now well resolved and represent a strong collaboration by two of Australia's leading architects.

The potential heritage impacts of the removal of the rear wing fabric of Drummond House and development of new buildings in the immediate vicinity are substantially outweighed by the obvious longer-term benefits of this transformational project to the operations of Royal Far West and the protection and reinforcement of the State-significant heritage values of this place as a long running charitable institution.

1. INTRODUCTION

1.1. BACKGROUND

Urbis has been engaged by Royal Far West to prepare the following Heritage Impact Statement for proposed alterations and additions to the Royal Far West Manly property that the corner of Wentworth Street and South Steyne at Manly.

The subject site includes one heritage item known as Drummond House, and the site adjoins a number of heritage items of local significance.

It is proposed to amend the Part 3A Concept Approval (Application # MP10_0159) under this Section 75W Application, which includes alterations and additions to Drummond House and the construction of mixed use buildings which incorporate tourist and visitor accommodation, residential apartments and retail/ commercial uses with basement parking and landscaping.

Accordingly, a heritage impact statement is required to assess the potential heritage impacts of this proposal on the subject site including Drummond House, and the vicinity heritage items and conservation areas. The assessment has had regard to the updated Conservation Management Plan for Drummond House prepared by Urbis in 2020.

1.2. SITE LOCATION

The subject site is bound by Wentworth Street to the north and South Steyne to the east. The site is located within the Manly Town Centre, one block south of the Corso, and is approximately 300 metres east of the Manly Ferry Wharf.

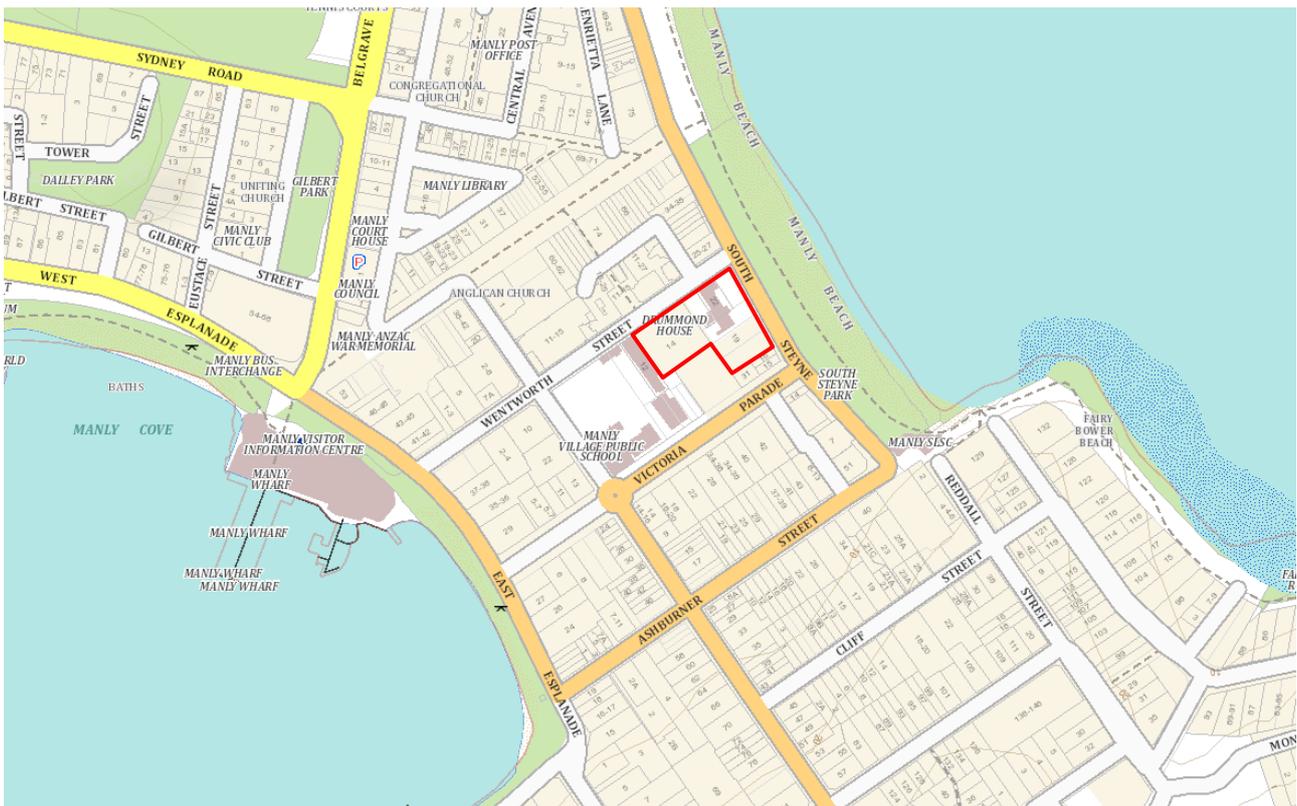


Figure 1 Locality map showing the subject site outlined in red
Source: SIX Maps 2020

1.3. METHODOLOGY

This Heritage Impact Statement has been prepared in accordance with the NSW Heritage Division guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by the Australia ICOMOS Burra Charter 1999 (revised 2013).

Site constraints and opportunities have been considered with reference to relevant controls and provisions contained within the Manly Local Environmental Plan 2013 and the Manly Development Control Plan 2013. The proposal has also been assessed against the relevant policies of the Conservation Management Plan for the Drummond House heritage item prepared by Urbis in 2020 and accompanying this proposal.

1.4. AUTHOR IDENTIFICATION

The following report has been prepared by Ashleigh Persian (Senior Heritage Consultant). Jonathan Bryant (Director, Heritage) has reviewed and endorsed its content. Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

2. SITE DESCRIPTION

2.1. OVERALL SITE DESCRIPTION

The subject site is a consolidation of eight (8) lots at the corner of Wentworth Street and South Steyne at Manly and contains the following existing buildings and lots:

Table 1 Subject site lots and buildings

Lot	Building/s
101 / 1247422	Hospital facility "Centre for Excellence" now known as the 'CCK' building – constructed in 2018 Drummond House – constructed in 1935 and later extensions (only part of the lot)
1 / 435023, 2587 / 752038 & 1 / 1093126, 1&2 / 223468	Royal Far West School
2/1093126	George Moncrieff Barron Wing
12/1096038	Norman Drummond Building



Figure 2 Aerial showing the subject site outlined in red
Source: SIX Maps 2020

There is limited vegetation on the Royal Far West site, which mostly consists of small trees or shrubs throughout the site and garden beds along the main elevations of buildings fronting the roads. The paved playground on the corner of South Steyne and Wentworth Street is part of two allotments. Norfolk Island pines that line Wentworth Street, South Steyne and Victoria Street, are all heritage listed. Car parking on the Royal Far West site is limited to a bitumen car park in front of the Elsie Hill building and a concrete car park at the back of the Elsie Hill building, both areas are west of Drummond House. Along South Steyne and Victoria Parade there is front to kerb parking, and side to kerb parking along Wentworth Street.

2.2. DRUMMOND HOUSE

Drummond House was originally designed as a two-storey building in 1935 by David Thomas Morrow of D. T Morrow and Gordon who acted as an Honorary Architect for the Scheme. Construction of the building was monitored by James Aubrey Kerr who went on to design other buildings on the Far West site. In 1945 a third storey was added and in the early 1960s a rear addition was built.

Drummond House was named after the Scheme's founder Stanley Drummond and the rear 1960s addition was named after Lucy Drummond, his wife.

The building has architectural features of the Inter-War Free Classical style. It is brick with a wide colonnade on the ground floor and paired Doric columns to the first and second floors. Contrasting arches originally highlighted the brickwork on the ground floor arches and in horizontal bands, however it has now been painted over. It has a Marseilles tiled hipped roof over the original building footprint and roof terrace on the rear addition.

Drummond House now houses children and their parents who are receiving treatment at Royal Far West. Over time, as the Scheme developed, so too did the requirements for different spaces within the Far West buildings. A large dining area occupies the ground floor of the rear addition.

Internally, Drummond House has substantially changed and little original fabric survives. Window and door openings are essentially the same with some minor alterations. Timber window joinery has been retained. The spaces on all floors have changed with different needs of the Scheme over time, and as such internal walls are all new. A central stair wraps around the original lift well which is enclosed. It is understood that the lift is still located within the lift well.

A glazed balustrade inside the existing wrought iron balustrade was added around 20 years ago to meet BCA requirements.

Figure 3 – Drummond House, Wentworth St elevation



Figure 4 – Drummond House, external and internal spaces



Eastern elevation



Roof and rear extension



Western elevation of rear 1960s addition to Drummond House and Elsie Hill building (left) with rear car park



Detail of front elevation



Main entrance doors, looking north



Ground floor reception and hall



Dining room in ground floor rear addition



Typical accommodation room, second floor



First floor balcony, looking east



Room off first floor balcony



Detail of openings to second floor balcony, looking south-east



Stair and enclosed lift well

2.3. FAR WEST SCHOOL

The Far West School is a three-storey red brick building with its northern elevation facing Wentworth Street and a playground to its east on South Steyne. It was constructed in 1958 and has had three additions: the north-east side wing with vertical glazing and tower (below centre); rear extension of four windows bays to main building (below left); and the rear south-west wing and link to Drummond House.

On the northern elevation the windows are double-hung vertically proportioned, while on the original portion of the eastern elevation the windows have six separate panes with heavy joinery. The rear addition windows on the eastern elevation have vertically proportioned four pane windows.

All window joinery is timber framed with concrete lintels. The gable form roof has grey metal sheeting.

Figure 5 – Far West School



Figure 6 – Far West School, external and internal spaces



West elevation (left) and extension to Drummond House (rear right)



Rear of School; 1960 walkway link to Drummond House (left) demolished in early 1980s (indicated by arrow)



Roof, looking north



Southern addition indicated by different colour brick & arrow



Undercroft playing area of southern addition



Detail of windows on school building's eastern elevation

2.4. GEORGE MONCRIEFF BARRON WING

The George Moncrieff Barron Wing was built on South Steyne in 1963 to the design of J. Aubrey Ker. Fifteen years later the Norman Drummond Building was added abutting the southern side of this building.

The four-storey brick building was constructed with rectangular grouped glazing on the ground floor and vertically proportioned banded timber framed windows on the upper floors. It originally had a narrow verandah that extended from the buildings primary elevation to the concrete feature wall on the building's northern elevation. On the third floors rooms were large rectangular dormitories for children.

The building was named after Dr George Moncrieff Barron, who was instrumental in the Scheme's early years.

When the Norman Drummond building was built in 1978 the Far West Chapel on the ground floor was decommissioned and the front façade of the building was altered. This included a new entry ramp, new awning on the ground floor and removal of window joinery and glazing on all levels and replacement with tinted glazing and aluminium framed panels.

The building is currently occupied by clinical services and offices of the Royal Far West Scheme.

Figure 7 – George Moncrieff Barron Wing



Figure 8 – George Moncrieff Barron Wing, external and internal spaces



Detail of main elevation ground floor



Roof, looking east (right roof top building is on 1970s Norman Drummond Building)



Typical accommodation room, second floor, looking north



Typical dormitory, second floor, looking north

2.5. NORMAN DRUMMOND BUILDING

The Norman Drummond Building was constructed in 1978 on the southern side of the Moncrieff Barron Wing, which was built in 1963, both fronting South Steyne.

The building was named after Norman Drummond, the Scheme's second Chairman, and brother to the Scheme's founder Stanley Drummond.

This four-storey brick building has articulated concrete panels that house the tinted vertically proportioned glazing with concrete window awnings. There is an addition floor in the centre of the roof.

The building has two open courtyards in the centre of the building that act as light-wells.

Internally the building has been substantially altered, although the stair and hallway configuration is generally the same. Accommodation, clinical rooms and offices have changed the room configuration on all floors.

Figure 9 – Norman Drummond Building



Figure 10 – Norman Drummond Building, external and internal spaces



Portion of roof, looking south



Concrete stairs with metal balustrade



Typical hallway, offices and courtyard, ground floor



Typical hallway and clinical rooms, first floor

3. HISTORICAL OVERVIEW

The following historical summary provides an overview of the Royal Far West site. Refer to the Conservation Management Plan for Drummond House (Urbis, 2020) for a more detailed history of this building.

3.1. ROYAL FAR WEST SITE EARLY HISTORY: 1810-1923

The early land grants in the area included Gilbert Baker's 30 acre grant of 1810, later purchased by D'Arcy Wentworth and leased to HG Smith. HG Smith had planned the Montpelier subdivision, his grand scheme for the private village that was to become Manly.

Development on the south side of the Corso was slow until settlement and subdivision in 1877 of the Bassett-Darley Estate. The Royal Far West site is within Section 5 of the Bassett-Darley Estate, which contained seven lots facing Wentworth Street (lots 1 to 7) (Figure 16). This subdivision created various streets, with Victoria Street (later Victoria Parade) picking up the existing alignment of Pacific Street. Few of the subdivision lots were sold from 1877, and numerous re-subdivisions were to follow throughout East Brighton over the next decade.

Manly Public School opened in Darley Road in 1883 with a frontage to Wentworth Street and the headmaster's cottage with a frontage to Victoria Parade.

Figure 11 – Portion of East Brighton Estate (c. 1877) and Bassett-Darley Estate (c. 1894)



East Brighton Estate; [Source: Manly Local Studies Image Library, MML/4745]



Bassett-Darley Estate; [Source: National Library of Australia, Map Folder 92, LFSP 1442]

Two weatherboard cottages were constructed in the late 1880s along Wentworth Street, Sandhurst (later known as No. 22) and The Bungalow (later known as No. 24). Sandhurst was demolished in 1934 to make way for Drummond House. Sandhurst was owned by T W Craven, produce merchant, in 1889, which was later purchased by Richard J Wild, carrier, in the mid-1890s (Figure 17).

The Bungalow was owned by Major J R Cooper in 1889 and D F Thornbury in 1897. In 1905 the dwelling was renamed Pearl Villa and was owned by George Blair.¹

¹ Sands Directory

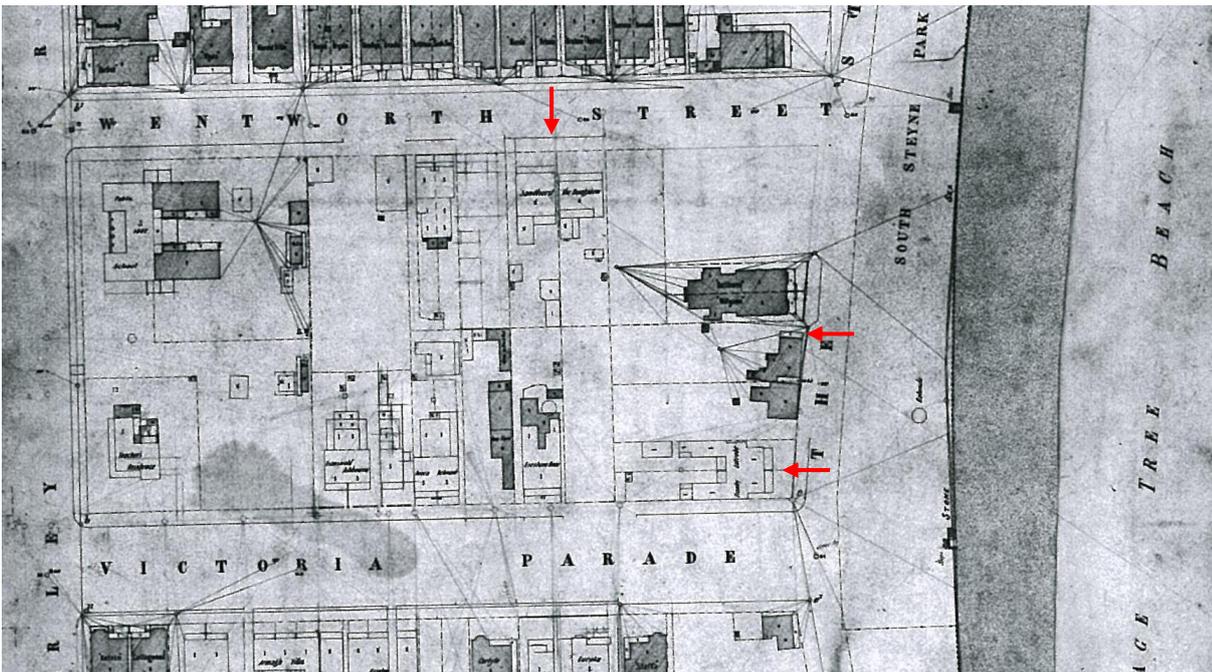
Figure 12 – Sandhurst, late 19th century



Source: Manly Studies Local Studies Library, MAN09172 Sandhurst, Wentworth Street. MWPHS image

Within the boundaries of the current Far West site there were six buildings by 1889. They include the two c. 1880s weatherboard cottages of *Sandhurst* and *The Bungalow* along Wentworth Street, the c.1885 terraces on the corner of Victoria Parade and South Steyne known as *Tranby* and *Latrobe*, two unnamed dwellings to the north (since demolished), and two other c. 1880s terraces further north known as *Bucklawen* and *Willyama* (since demolished).

Figure 13 – Plan of site, 1889



Source: Sydney Water 2011, Manly Sheet No. 11, 21 Dec 1889

In 1892, from The Corso to Victoria Parade along the Steyne, there were four properties owned but they were not numbered yet: AR Winckler, Robert Cook, HR Woods (accountant) and Mrs Lequesne.

The first mention of *Latrobe* in the Sands Direction was in 1894 with the owner being Mrs Cook. In 1896 *Latrobe* was still owned by Mrs Cook and *Tranby* was listed as a 'Patient's Home' owned by Nurse Bonnar. In 1902 the terrace was listed as a 'Patients and Nurses' Home' owned by Nurse Graham and called *Omrah*.

Two dwellings north of the corner terrace were used as refreshment rooms. The corner terrace was owned by Arthur Griffith MLA in 1908 and named *Ancowinna*.²

Bucklawen was owned by Mrs Ethel Knight in 1908 may have also owned the twin terrace of *Willyama*, as she is noted as the owner of that terrace in 1910 with *Bucklaweni* owned by E. Leslie Moses in 1910. Other dwellings along South Steyne included *Chicheley* owned by Albert Pearce, Clovelly owned by Halimton Naeth, the Manly 'Palace Skating Ring' managed by J. Crockford, WJ McCarthy (contractor), Mrs WJ McCarthy (refreshment rooms) and Arthur Griffith.

The Steyne was renamed as North and South Steyne around 1910, and properties were numbered. From around 1910-1930, properties along South Steyne changed ownership many times.

In 1911 the Eden Gardens commenced as an open-air and under canvas venue for stage acts and music operating only in the summer. This site on the corner of South Steyne and Wentworth Street was later to house the Big Wheel then Luna Park. Around 1921 it became known as the Paris Gardens, reflecting its 'naughty' new image, and new buildings appear to have been erected.³

Figure 14 – Paris Gardens in backdrop to Manly Beach, 1921



Source: Manly Local Studies Library, 'Eden Gardens / Paris Gardens'

Property owners of No. 15 South Steyne (corner Victoria Pde) include J Blair Hickman of *Colona* (victualling officer) in 1910, John S Grigson of *Colona* in 1912, Mrs G Broadwood in 1920, Bushell, John W in 1925 and Miss E. Davidson in 1930.⁴

Property owners of No.16 South Steyne include Arthur Griffith of *Ancowinna* in 1910, Mrs MW Kilminster of *Aberdeen* in 1912, FR Watson (medical practitioner) in 1920, Miss Mildred Yeo in 1925 and CH Coleman in 1930. Property owners of No. 18 South Steyne include H Goodwin of *Chicheley* in 1910, FC Tompson of *Chicheley* in 1912, JW Hart in 1920, Miss E Davidson in 1925 and no owner was listed in 1930.

Property owners of No. 19-20 South Steyne include F Sceats (refreshment rooms) in 1910, Charles Cowley in 1920 and Goward (refreshment rooms) in 1930. Property owners of No. 21 South Steyne include Ethel Knight of *Willyama* in 1910. Property owners of No. 22 South Steyne include E. Leslie Moses of *Bucklawen* in 1910. In 1930 Miss E Davidson owned No. 21-22.

Meanwhile on Wentworth Street, a new boarding house called *Wingadee* was built east of Pearl Villa (The Bungalow) at the ocean beach end around 1908.

² *Sands Directory*

³ Metherell 2006, Chapter 5

⁴ *Sands Directory*

By 1910 another new house *Halcyon* had been built between Wild's *Sandhurst* and Mrs Dandie's boarding house *Wingadee* (No. 28). *Halcyon* (No. 26) may also have been purpose-built as a boarding house by E A Baldeck and was certainly operated as one by Jacob Morris by 1914.

Many women at this time were the owner's of boarding houses, which were thickly clustered at either end of Wentworth Street near the harbour-front and wharf and particularly near the ocean beach. By late 1914 Wentworth Street was nearly fully developed.

Wild still owned *Sandhurst* in 1914 and land to the west which may have housed materials for his business, R J Wild & Sons, General Carriers. To the east of *Sandhurst* along Wentworth Street, William Gardner owned *Grantleigh* (No. 24), Jacob Morris (No. 26) and JW Piggott (painter) of *Wingadee* (No. 28).

By 1915 along Victoria Pde *The Carlton Residential Chambers* (No. 29) were established on the vacant block west of Tranby and Latrobe (facing South Steyne) and east of Eversham (No. 27).

Around 1919 the site of the old house *Idalia* (No. 18) was redeveloped and became Wentworth Flats. This forced the closure of part of R J Wild and Sons' carrier's yard fronting Wentworth Street. Wild sold *Sandhurst* in 1920 and moved his family to Eastern Hill. *Sandhurst* then became a boarding house or residential run first by Mrs JJ Ormiston then by Mrs G E Offord. *Halcyon* (No. 26) was demolished in 1920 and redeveloped for the new Yandilla Flats.

In 1922 the Paris Gardens on the corner of South Steyne and Wentworth Street became the Palais de Danse and from 1923 until 1925 as The Follies, after the 'Folies Bergere', at the notorious Moulin Rouge in Paris. In 1925-26, racing to keep up with the next big thing, it became The Palais.⁵

By 1922 along Victoria Parade the *Newstead Flats* (No. 31) were established in the former rear yards of Tranby and Latrobe to the design of architects Waterhouse and Lake. Properties along the western side of Victoria Parade were predominantly boarding houses throughout the 1920s and 1930s, however residential flats were becoming popular.⁶

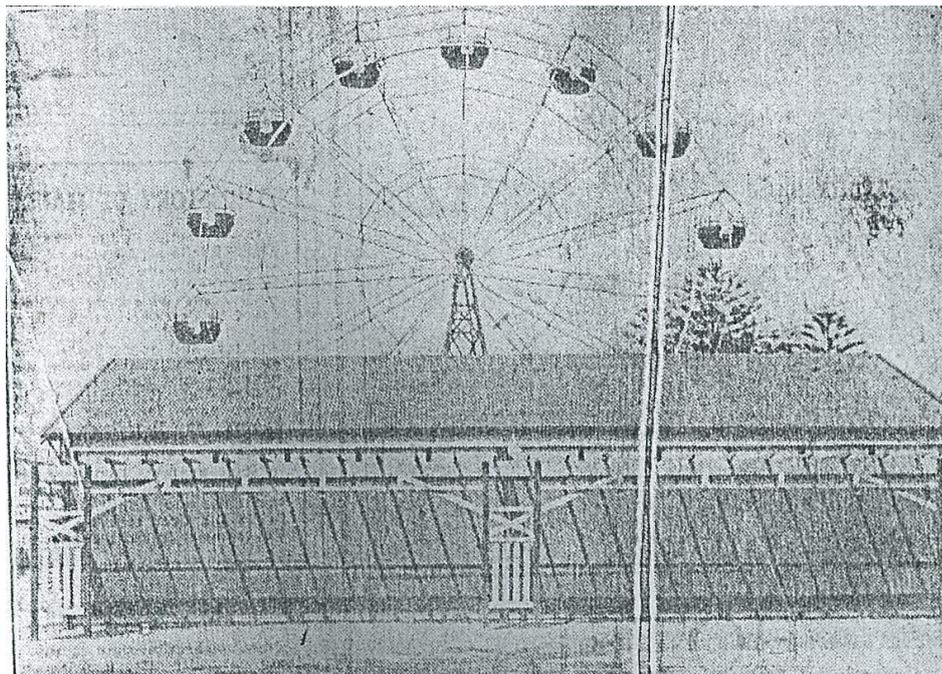
In 1925 along Wentworth Street, Mrs E Foster owned *Wingadee* (No. 28), *Yandilla Flats* (four flats, No. 26) had two tenants, E J Bourne owned *Grantleigh* (No. 24), Mrs G E Offord owned *Sandhurst* (No. 22), and the *Wentworth Flats* (No. 18-20) had three tenants.

The Palais was pulled down in late 1926 in preparation for Manly's newest attraction, the Big Wheel. In 1927 Australia's biggest Ferris wheel was erected on the site, renamed the Big Wheel Gardens (Figure 20). Towering 80 feet above the Steyne and Ocean Beach, the Giant Ferris Wheel became a Manly landmark and a beacon for Manly's children and visiting families.

⁵ Metherell 2006, Chapter 5

⁶ Metherell 2006, Chapter 3

Figure 15 – Big Wheel Grounds, 1927



Source: Manly Local Studies Library, 'Big Wheel Grounds', MML CB4 from Daily Telegraph 7 Jan 1927

The Big Wheel and its surrounding amusement park entertained large weekend and holiday crowds attracted to Manly in the 1920s and 1930s on the corner of Wentworth Street and South Steyne. When the grounds were sold in 1930, Harold Spry established Luna Park on the site. The site boasted the biggest Ferris wheel in Australia, at a height of 80 feet. The Manly Luna Park predated the Sydney Luna Park at Milson's Point by five years. There was no admission charge and none of the rides cost more than 9d.⁷

Rides at Manly Luna Park included dodgem cars and gee-whizz rides, with the major ride being a large carousel or merry-go-round. The Park's dodgem car building was also used as a venue for screenings of 16mm films, such as Charlie Chaplin silent films. There was a penny arcade with slot machines. Over the years pieces of the land, which was not owned by Mr Spry but by the State Education Department and the Far West School, were resumed for the expansion of the Royal Far West complex, and Luna Park became smaller, finally closing in the 1957.

3.2. STANLEY AND LUCY DRUMMOND

Stanley Gillick Drummond was born at Attunga in May 1884. His father was a saddler who later became a teacher in NSW. On leaving school Stanley became a junior clerk in the Lands Department, until ill health lead him to become a carpenter's assistant.⁸

Stanley decided to give his life to Christ and he became a Minister. In 1909 in his first posting as a Minister, he was thrown from a sulky and landed on a stump on his hip. He spent eighteen months in pain in an iron splint, moving with the aid of crutches. He eventually recovered but retained a slight limp, however the injury caused him to be invalided and he gave up his ministry.

He retired to Bowral and married Lucy who was a mission sister at the Central Methodist Mission. He was fitted with an iron splint to help his injury and later received physiotherapy. He was admitted to the Methodist Ministry in 1914.

Stanley Drummond was posted to the position of superintendent of the Far West Mission of NSW Conference of the Methodist Church in 1924. The centre of the Mission was Cobar with responsibilities to other rural areas of 130,000 km sq. In 1924 Drummond was treated in Sydney for gallstones, and the idea for Far West was conceived by Drummond, while he was convalescing at Manly.⁹

⁷ Manly Local Studies Library 2011; Metherell 2006, Chapters 5 and 6

⁸ Royal Far West Children's Health Scheme 1984:4

⁹ Killeen 1995:3-6

Drummond's health deteriorated in 1927 and he chose to abandon his Church position and risk financial insecurity, which was partly relieved by £250 damages he received for being hit by a car in 1928. In June 1933 he was appointed MBE, and in July published in *Health* his account of the inspiration and innovations of the operation.

Lucy Drummond passed away in December 1942 and Stanley Drummond died of cancer in April 1943.¹⁰

The next section outlines the establishment and development of the Far West Scheme.

Figure 16 – Stanley Drummond with his brother and wife



Reverend Stanley Drummond (left) and his brother Norman Drummond, c. 1915; [Source: Manly Local Studies Image Library, MML/2765]



Stanley and Lucy Drummond, c. 1936; [Source: Far West Children's Health Scheme Magazine 1936:4]

3.3. FAR WEST CHILDREN'S HOME AND SCHEME: 1924-2011

The Far West Children's Health Scheme¹¹ was founded in 1924 by Stanley and Lucy Drummond. Stanley's brother, Norman Drummond was the Scheme's second Chairman.

1925 was determined by the Church to be the "Children's Year" as the number of children attending Methodist Sunday schools was declining in 1923. The aim was to enliven their interest in the Church. Drummond wanted to extend Mission services to a group of poor and less than robust children to holiday in Sydney.

Stanley and Lucy Drummond, Mr Sid Coleman and several volunteers organised the 1st Annual Summer Camp for children from the remote far west of NSW, held in Cronulla in December 1924. It was successful enough for a 2nd camp, which was at Collaroy in January 1925.¹²

In January 1926 a 3rd camp was held in a large house on the Esplanade at Manly with Gordon Winn. Eighty children were taken on the basis of unfavourable health from medical officers of the NSW Education Department and other doctors. The house was next door to a hospital owned by Dr. Moncrieff Barron, who offered his services free of charge, having discovered many of the camp children had severe health problems.

¹⁰ Mitchell 2011

¹¹ The Scheme was officially given the title of 'Royal' in recognition of its long service to country children in 1970.

¹² Bavinton 2011, Far West Timeline

In 1928 Elsie E. Hill turned her guesthouse in Wentworth Street Manly into the first home for the far west children. She was appointed the Scheme's first Matron in 1926 and received an MBE in 1956 in recognition for her life-long dedication.

Until 1929 children were taken to Sydney by volunteers to be looked at by doctors and afterwards they were farmed out to private homes or at Elsie Hill's boarding house. The demand for accommodation grew and the Scheme purchased its first headquarters in 1929 at No. 25 Wentworth Street for £2,259. It became known as 'The Depot' and was located opposite the present Drummond House, and it housed the children while they received post-operative treatment in the 1920s (Figure 22).¹³

Figure 17 – Depot Building (now demolished), Wentworth St



Source: Wearn 1966

Dr Barron became the Scheme's first Honorary Medical Superintendent in 1929 and was awarded an MBE in 1937 for his dedication and service. At this time the Manly Public School became the venue for the annual summer camps.

In 1930 education authorities in NSW realised that country children who were convalescing in Manly were missing their school lessons and made a suggestion that a classroom was needed. The NSW Department of Education provided a teacher from the Manly Infants School for patients staying at the Scheme.¹⁴

The schooling facilities at the site are conducted by the Education Department solely for Far West patients. This enabled country children to keep up their studies even while in bed and undergoing long periods of treatment.

Stanley and Lucy Drummond spent much of their time "touring the Inland, constantly finding ill and crippled children".¹⁵ They brought children to Sydney to be cared for. The holiday scheme eventually expanded and became a health scheme. More children were being treated and facilities became inadequate and crowded. His Excellency Sir Phillip and Lady Game showed a keen interest in the work of the Scheme, and through discussions with Mr Drummond established a Building Fund in 1932 for the purchase of land and the erection of a house to accommodate the children.

The Scheme's first modern building was Drummond House¹⁶, designed by David Thomas Morrow of D. T Morrow and Gordon as Honorary Architect. Construction of the building was monitored by James Aubrey Kerr, who went on to have a long association with the Scheme as an Honorary Architect.¹⁷

By 1935 there were over 500 Far West Branches in NSW supporting the Manly headquarters.

¹³ Bavinton 2011, Far West Timeline

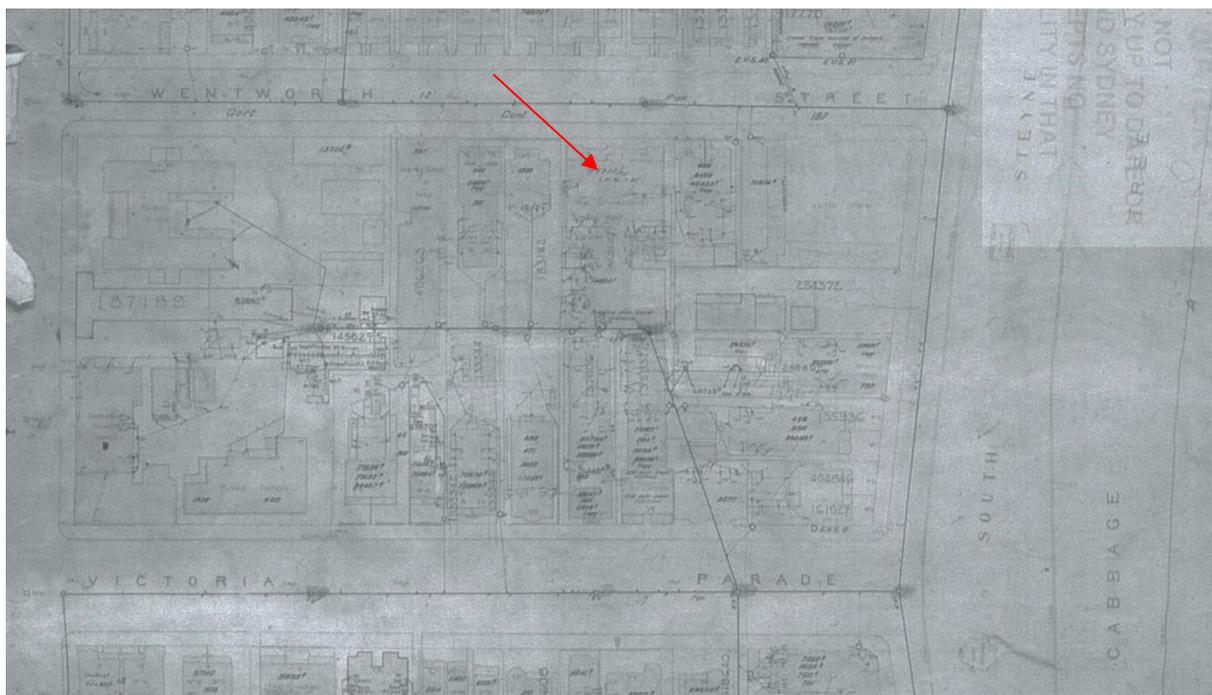
¹⁴ Wearn 1966:19; Bavinton 2011, Far West Timeline

¹⁵ Wearn 1966:20

¹⁶ A detailed history of Drummond House is provided in the next Section of this Report

¹⁷ Wearn 1966:37

Figure 18 – Plan of site, 1935



Source: Sydney Water 2011, Manly Sheet No. 11, 2 Dec 1935

In August 1938 the Far West School was formally opened as a school in its own right with teachers employed by the Department of Education.

Figure 19 – South Steyne opposite Luna Park, 1937



Source: Manly Local Studies Image Library, File No. 100\100228

War time restrictions and months of stress with low finances took its strain on the Scheme. The School was relocated to Springwood in 1942. In 1944 permission was granted to resume the residence at Manly and the School at Manly reopened.

Luna Park can be seen on the corner of Wentworth Street and South Steyne where land was slowly resumed by Far West until the Park closed in 1957. There are several buildings located between Drummond House and the Merry-go-round, which may have been associated with the Park (i.e. dodgem car building). There were also various buildings fronting South Steyne, north of the c.1885 terraces on the corner of Victoria Parade.

In 1949 the Government contributed £1,000 to the Scheme and took steps to resume land on the Ocean Beach at Manly, adjoining the Far West Home for the establishment of a school building. In the meantime the present school was refurbished with additional rooms for manual training boys and domestic science for girls.¹⁸

¹⁸ Wearn 1966:204

Figure 20 – Aerial of site, 1943



Source: SIX Maps 2020

In 1950 the Annual Report noted that the Scheme was having problems trying to cope with the pleas for treatment from doctors with a waiting list of nearly 100 children recommended for treatment. The Far West Council decided not to renew the lease of the 'Plaza' next door to the Far West playground (a residential block owned by the Scheme), and they hoped to take over the building to provide more accommodation for children. Nurses could have then been accommodated in the 'Plaza' instead of the present nurses' block adjoining the home, the nurses' home becoming a Far West Home annexe.¹⁹

Facilities at the Manly site included a splint room, eye clinic, ideal nursery and school for patients. A room was established for a mother and her child, which has proved most useful and appreciated. The extra accommodation for the home and the new school and playground to which the adjoining resumed land, now used as an amusement park, will be devoted, will make a wonderful difference to the Home.

In 1953 a two year legal negotiation to acquire vacant possession of a cottage, next door to Drummond House, was completed. This has now become headquarters for the nursing staff. The two-storey building was named in memory of the late Mr JH McNevin, a grazier who generously bequeathed sufficient funds which permitted this specific expansion. The 'McNevin Nurses' Home' contains 27 bedroom, white tiled toilet facilities, recreation rooms, lounge and dining room overlooking Pacific Ocean and all modern amenities to facilitate the easy running of the establishment.²⁰

The nurses' old quarters were renovated throughout and furnished with two beds to each room and opened up as an annexe in which 41 additional patients were housed. It was named the 'Lucy Drummond Girls' Annexe' after Lucy Drummond, wife of the Scheme's founder Stanley Drummond.²¹

Drummond House was also refurnished in 1953. A new purpose built Splintmakers' workshop was built at the back of the Wentworth Flats (previously housed on the second floor of Drummond House). The new Splintmakers' workshop, completed in November 1953, was a single-storey brick building with tiled roof, large

¹⁹ The Far West Children's Health Scheme 1950:5,8

²⁰ The Far West Children's Health Scheme 1953:4

²¹ The Far West Children's Health Scheme 1953:17

windows and a special alcove for storage. Following the renovations, Drummond House was officially opened in May 1954 by the Hon. J.B. Renshaw.²²

The Wentworth Flats at No. 18-20 Wentworth (built in 1919) were used as staff quarters at this time. A new garage has been constructed at the back of the clerical office to store the gear needed for the annual camps.

The Plaza renovations and repairs were completed at the end of June to make it residential suitable for nurses' quarters. The back of the building adjoined the playground of Drummond House, giving easy access for staff. The nursing staff had a large furnished lounge with glass windows facing across the promenade with an adjoining modern dining room. Louvers were fitted to the side windows to give plenty of light and two double doors and plate glass windows. The dining room was previously a public café. The airy recreation room in the quadrangle at the back is used for table tennis by the nurses and for relaxing. The 27 bedrooms are painted cream and finished with a washable gloss.

A building was acquired in Dee Why in 1956 for the Home to accommodate mothers. It was officially opened in May 1956, however it was too far from Manly.

When Manly Luna Park closed in 1957, the rides were sold off, and around 1958 the remaining land was added to the Far West Children's Home.

The Wentworth Flats were demolished to make way for the Far West Hospital School, which was completed in 1958 with spacious classrooms, craft room and modern home management unit and a library.²³ It was officially opened in February 1959 by the Hon R.J. Heffron, Deputy Premier and Minister for Education. It was located setback from South Steyne where there was a play ground.

The Scheme continued to expand and on 24 April 1959 the 'Far West Children's Health Scheme' was incorporated. The Hospital School was officially opened in February 1959 by the Hon. R.J. Heffron, Deputy Premier and Minister for Education.²⁴

In 1960 the Far West Council was forced to revise its building plans for the Moncrieff Barron Wing due to action taken by Manly Municipal Council resuming the frontage of Ocean Road and No. 25 Wentworth Street, which required the demolition of this building. Wentworth Flats, next to the Home, were renovated to provide extra accommodation for staff. These changes lead to alterations with the building plans, with a new five-storey building to be erected on the land adjacent to the Home in Wentworth Street, which was occupied by two old semi-detached houses. The ground floor was to be used as administration offices for the Scheme and other floors for nurses' accommodation, with a penthouse on the top floor. The basement would house cars.²⁵

Additions to the Hospital School were undertaken in 1960 with a three-storey wing added and a link from the new school to Drummond House at the second level. A three-storey wing costing £15,000 was added by the Department of Education to the Far West Hospital School in the early 1960s, which caters for the sick and handicapped children who are patients at the Home. The wing has a fully protected passageway at the second floor linking the classrooms with the therapy rooms in the adjoining Drummond House.

The depot (25 Wentworth St) was parted with by the Far West Council in 1962, the location where the Scheme had commenced in the 1920s by the Drummonds. The depot was used as an Administration Block in later years. Less than a month of the office and nursing staff moving into their new quarters the nurses' old quarters were razed to the ground.

²² Bavinton 2011, Far West Timeline

²³ Wearn 1966:240

²⁴ Royal Far West 2011; Bavinton 2011, Far West Timeline

²⁵ Wearn 1966:244

Figure 21 – Old Nurse' Quarters in Wentworth Street, c. 1960



Source: *Opposite side of Wentworth Street to Drummond House; [Source: Bavinton 2011, Photograph in Exhibition*

The foundation stone of the new 'Elsie Hill' administration office and nurses' quarters was laid in 1962. The building had black and white ceramic mosaic pillars on either side of the entrance steps and backed by large plate-glass picture windows and entrance door in which was set the emblem of the Scheme, a red shining Sturt Desert Pea.

The building had a honeycomb patterned glazed cement panel outside which gave privacy to the reception desk in the foyer. The top floor of the building was occupied by a penthouse, available for visiting country Sisters when they are in Sydney. Excavation under the building provided accommodation for the Far West ambulances, other cars and contained a boiler. Maintenance men had a well-lit workroom on the ground floor.²⁶

Figure 22 – Elsie Hill Administration and Staff Quarters, c. 1962



Source: *The Far West Children's Health Scheme 1962:7*

²⁶ The Far West Children's Health Scheme 1962:8

The Elsie Hill Administration and Staff Quarters were officially opened in September 1962 by the NSW Governor, Lt-General Sir Eric Woodard (Figure 28).²⁷ The building was designed by James Aubrey Kerr. Elsie Hill was a volunteer with the Collaroy Camp and she housed children at her property in Sydney Road Manly.

Figure 23 – Drummond House and Elsie Hill building on Wentworth St, c. 1962



Source: *Manly Local Studies Image Library, MML/2771*

The Terraces were purchased by the Scheme in 1962 and were completely refurbished. The building had previously housed nurses and had been run as a boarding house and café. With the closing of Dee Why House, the Terraces (known as ‘Surfside’) now provided accommodation for mothers who accompanied their children to Sydney for treatment.²⁸

Excavation commenced in late 1962 for the new Moncrieff Barron Wing. The foundation stone was laid in May 1963. The George Moncrieff Barron Wing was officially opened by the Prime Minister, the Rt Hon Sir Robert Menzies in 1965. The four-storey building was designed by James Aubrey Kerr and cost £120,000.²⁹ It was to be used as a speech therapy clinic.

²⁷ Wearn 1966:251

²⁸ The Far West Children’s Health Scheme 1962:6

²⁹ *Manly Daily* 20 February 1964

Figure 24 – Construction of the Moncrieff Barron Wing, 1964



Source: Manly Local Studies Image Library, MML/2775

Drummond House was refurbished in 1966-67 and a roof terrace added around the same time.

Figure 25 – Far West site, corner South Steyne and Wentworth Street, c.1966



Source: *Wearn 1966:i*

In 1970, following a visit by Her Majesty, Queen Elizabeth II and Princess Anne, the Scheme was officially given the title of 'Royal' in recognition of its long service to country children.³⁰

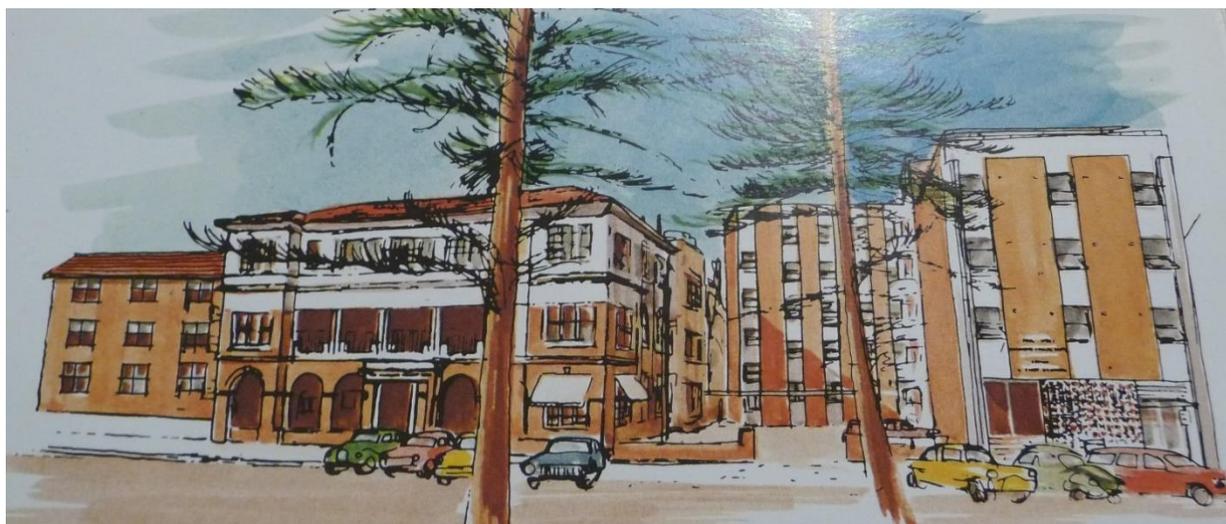
The Terraces were further altered in 1974 when they were opened as the Far West Parent and Child Units. By 1975 Drummond House accommodated 80 children. Physiotherapy, occupational therapy, orthoptics and dental surgery departments were located on the top floor of the building. The three-storey Far West Hospital School is a modern building catering for 200 walking patients.

The Elsie E. Hill Staff and Administration Quarters accommodated trained nurses, nursing aides, assistant nurses and Nurse Aid Training School on the top three floors with administration offices on the ground floor.

³⁰ Royal Far West 2011; Bavinton 2011, Far West Timeline

The George Moncrieff Barron Memorial Block accommodated an additional 126 children on three floors with the ground floor is the speech therapy department and recreational training.³¹

Figure 26 – Far West Buildings Complex at Manly, 1975



Source: Wentworth Street (top) and South Steyne (bottom); [Source: *The Far West Children's Health Scheme 1975:1*

The *Nursing Homes (Assistance) Act* of 1974 was established which provided for Australian Government funding assistance. State Government funding for the Scheme increased in 1975.³²

Drummond House was upgraded around 1973 to meet safety standards, and a new wing to link the George Moncrieff Barron Memorial Wing was undertaken from 1976. The extension was completed in 1978, doubling the size of the George Moncrieff Barron Memorial Wing and the new portion was named after the Scheme's second Chairman, Norman Drummond (Stanley's brother). The extension was funded by a Commonwealth Department of Social Security grant, and was officially opened by the Governor-General, Sir Zelman Cowan.

The camps for the far west children continued for over 50 years, staffed only by volunteers. The last camp was in Narrabeen in 1977.³³ Additions to the School were completed in 1977, which included a new library, art and craft room, and home science room.

The Norman Drummond Treatment and Training Centre was opened by His Excellency the Governor-General of Australia, Sir Zelman Cowen in 1978. The Roger Morgan rooftop garden was opened in 1979.

³¹ *The Far West Children's Health Scheme 1975:1*

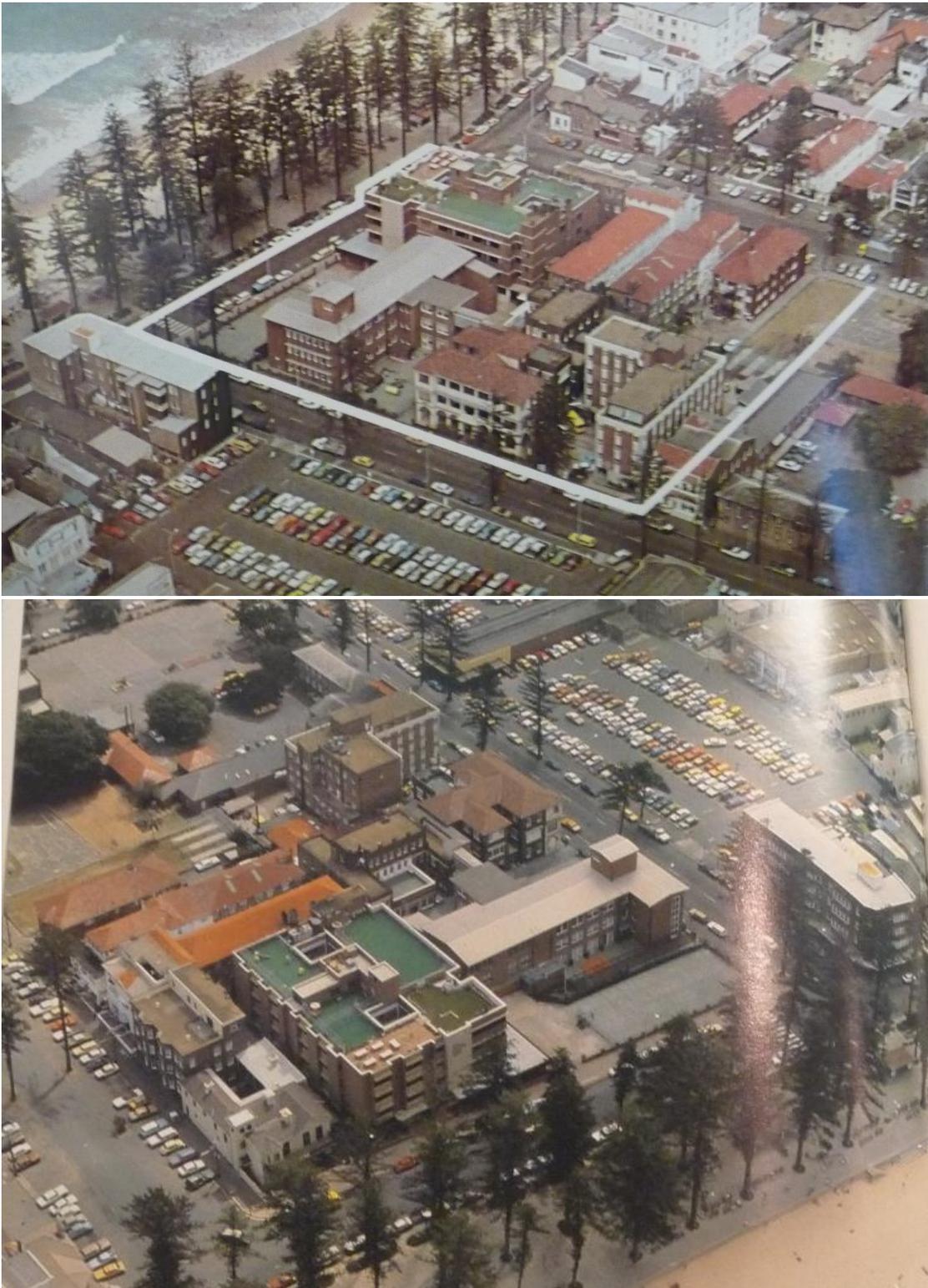
³² *The Far West Children's Health Scheme 1975:6*

³³ Bavinton 2011, *Far West Timeline*

The Scheme's 1981-82 Annual Report noted that several buildings have been referred to the Scheme for use, but they are not always in good condition. This has drained funds, especially with economic losses in the state through bush fires and drought. During the 1980s various facilities were upgraded.

The Splint Department closed its doors in 1982, as polio was no longer a problem in Australia. The purpose built Splint Workshop at the back of the Wentworth Flats may have operated out of the Drummond House or the Stanley Drummond building, following the demolition of the Flats and Workshop around 1957 to make way for the new School building.

Figure 27 – Aerial photograph of site in Manly, c. 1982



Source: *The Far West Children's Health Scheme 1982:1 (top) and 1982:i (bottom)*

The 1988-1989 Annual Report noted that changes in government policy mean that the Scheme is now classified as a non-government organisation. Around this time murals were painted within the Medical Centre and Royal Far West School through grants from the Aboriginal Arts Board.³⁴

In the late 1980s Royal Far West became responsible for two aged nursing homes in the area, Austral House in North Manly and Ocean View in Mona Vale.

Drummond House was refurbished in 1997 to provide an aged care hostel costing. Other Aged Services owned by Royal Far West included Palm Grove, Austral and Ocean View. The *Aged Care Act 1997* was introduced which led to changes to funding and accommodation of residents, and certification of buildings by the year 2000.³⁵

By 2006 the high care nursing homes were decided to be sold by the Far West Council. Various buildings underwent general repairs and maintenance.

In 2008 the organisation changed its name to Royal Far West.³⁶

The Terraces were altered in 2010 for their new lease by the Manly Medical Centre. Changes to the building include removal of doors, part demolition and part infill of internal walls and new kitchen fitouts.

³⁴ The Far West Children's Health Scheme 1989:3,13

³⁵ The Far West Children's Health Scheme 1998:14

³⁶ Royal Far West 2011

4. HERITAGE SIGNIFICANCE

4.1. WHAT IS HERITAGE SIGNIFICANCE?

Before making decisions to change a heritage item, an item within a heritage conservation area, or an item located in proximity to a heritage listed item, it is important to understand its values and the values of its context. This leads to decisions that will retain these values in the future. Statements of heritage significance summarise the heritage values of a place – why it is important and why a statutory listing was made to protect these values.

4.2. HERITAGE LISTINGS

4.2.1. Subject Site Heritage Listings

The following heritage listings apply to the subject site.

Table 2 – Heritage Listings

Type of Listing	Name of Item	Assessed Level of Significance
STATUTORY LISTINGS		
World Heritage List under the World Heritage Convention (places of outstanding universal value)	Not applicable	Not applicable
National Heritage List under the Federal Environment Protection and Biodiversity Conservation Act 1999 (natural and cultural places of outstanding heritage value to the nation)	Not applicable	Not applicable
Aboriginal Heritage under the National Parks and Wildlife Act 1974 (places that hold great meaning and significance to Indigenous people)	Not applicable	Not applicable
Commonwealth Heritage List under the Federal Environment Protection and Biodiversity Conservation Act 1999 (natural, Indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control)	Not applicable	Not applicable
NSW State Heritage Register under the Heritage Act 1977 (items of state significance)	Not applicable	Not applicable
State Government Agency Section 170 Heritage and Conservation Register under the Heritage Act 1977 (items of local or state significance)	Not applicable	Not applicable

Type of Listing	Name of Item	Assessed Level of Significance
Manly Local Environmental Plan 2013 Schedule 5 – Items of Environmental Heritage (items of local significance)	Item 245 (<i>Lot 1, DP 72969; Lot 1, DP 979703</i> – now amalgamated, so heritage listing applies to Part Lot 1 in DP 1247422 – Schedule 5 needs to be updated to reflect this lot amalgamation, however the listing only applies to part of the new amalgamated lot). Described as <i>The Drummond Far West Home</i> , 22 Wentworth Street	Local
NON-STATUTORY LISTINGS		
Conservation Areas under the Manly Development Control Plan 2013	Not applicable	Not applicable
National Trust of Australia (items of local, state or national significance)	Not applicable	Not applicable
Register of the National Estate (not operational) under the Environment Protection and Biodiversity Conservation Act 1999 (items of local, state or national significance)	Not applicable	Not applicable
Australian Institute of Architects Register of Significant Architecture in NSW	Not applicable	Not applicable
Institution of Engineers Australia (no official register but informal list of buildings that have heritage value)	Not applicable	Not applicable

4.2.2. Vicinity Heritage Listings

Table 3 Vicinity Items

Heritage Item	Description
Item 226	House, 15–16 South Steyne, Part C, DP 369972; Lot 1, DP 1091717
Item 238	Street trees, Victoria Parade
Item 241	Residential flat building, 29 Victoria Parade, SP87727
Item 242	Residential flat building, 31 Victoria Parade, SP 11799
Item 243	1920s school building, 10 Wentworth Street, Lot 1, DP 999134
Item 244	Former School of Arts, 12 Wentworth Street, Lot 1, DP 999137
Item 246	Street trees, Wentworth Street
Item 247	Manly Village Public School, Wentworth Street (corner of Wentworth Street, Darley Road and Victoria Parade), Lot 1, DP 999133

Figure 28 – Extract of Heritage Map



Source: NSW Planning Portal

4.3. ESTABLISHED STATEMENTS OF SIGNIFICANCE

The following established statements of significance have been included for Drummond House, which is the only listed heritage item on the subject Royal Far West site, and the heritage items in the vicinity of the Royal Far West site.

4.3.1. Drummond House

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.³⁷

Urbis generally agree with the above established statement of significance however make the following comments:

- The building, whilst being an example of the Inter-War Classical style, has been substantially modified from its original form with many original features obscured by later works or removed. The original building was a two-storey form with a flat parapeted roof, and this form was lost through the later addition of the third level. Further, the interior of the building has been substantially modified and upgraded in line with the evolving needs of the charity to provide an appropriate level of amenity for their residents, and there is limited original or significant fabric remaining.
- The building has a high level of heritage significance for its long running and ongoing role as a charitable institution providing a place of respite, education and security for children in need. This institutional role is central to the significance of the place and is regarded as being of higher significance than the fabric of the building.

4.3.2. Vicinity Heritage Items

The following statements of significance for the heritage items in the vicinity of the subject site have been directly sourced from the Heritage NSW State Heritage Inventory database online.

Table 4 Statements of Significance – Vicinity Items

Heritage Item	Description	Established Statement of Significance
Item 226	House, 15–16 South Steyne, Part C, DP 369972; Lot 1, DP 1091717	Representative substantial Victorian Italianate house. ³⁸
Item 238	Street trees, Victoria Parade	Historical line of HG Simth's intended Victoria Park. Aesthetic. ³⁹
Item 241	Residential flat building, 29 Victoria Parade, SP87727	Not available.
Item 242	Residential flat building, 31 Victoria Parade, SP 11799	Not available.
Item 243	1920s school building, 10 Wentworth Street, Lot 1, DP 999134	Not available.
Item 244	Former School of Arts, 12 Wentworth Street, Lot 1, DP 999137	Not available.

³⁷ Heritage NSW, State Heritage Inventory, The Drummond Far West Home,

<https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020103>

³⁸ <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020518>

³⁹ <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020451>

Heritage Item	Description	Established Statement of Significance
Item 246	Street trees, Wentworth Street	Listed for its aesthetic importance to the streetscape. ⁴⁰
Item 247	Manly Village Public School, Wentworth Street (corner of Wentworth Street, Darley Road and Victoria Parade), Lot 1, DP 999133	Not available.
Town Centre Conservation Area	N/A	<p>The Manly Town Centre Conservation Area (TCCA) 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 TCCA as it is today. The physical elements of the TCCA reflect this early development 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.</p> <p>The beautiful natural setting of the TCCA has provided a solid foundation for its picturesque qualities. The cultural landscape, including plantings, monuments and open spaces, reflects the continued enhancement of the TCCA over time, in order to attract and sustain visitors to the area, which in turn has provided great support to the local economy. The many historic vistas which remain to this day enhance the visitor experience of the TCCA and assist with providing an interpretation of the TCCA as it has changed over time.</p> <p>The TCCA maintains a high level of social significance, as a popular destination for local, national and international tourists, as well as through its encapsulation of the Australian beach culture.⁴¹</p>

⁴⁰ <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020454>

⁴¹ <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020838>

5. THE PROPOSAL

It is proposed to amend the Part 3A Concept Approval (Application # MP10_0159) under this Section 75W Application, which includes alterations and additions to Drummond House and the construction of mixed use buildings which incorporate tourist and visitor accommodation, residential apartments and retail/ commercial uses with basement parking and landscaping.

In summary the works include:

- Demolition of the rear wings of Drummond House
- Excavation of the site for the provision of car parking
- Adaptive reuse and internal reconfiguration of the remaining portions of Drummond House
- Construction of new rear additions to Drummond House
- Relocation of children's play area to an internal courtyard area for security and safety
- Construction of a medical centre and commercial use space to Wentworth Street with accommodation above
- Construction of a new consistent building along South Steyne providing further accommodation

The following plans have been prepared by Murcutt Candalepas (Issue B 14.07.2021) and have been relied on for this heritage impact statement:

DRAWING SCHEDULE

S75W	0001	COVER SHEET
S75W	0150	SITE ANALYSIS PLAN
S75W	1001	BASEMENT LEVEL 2 ENVELOPE PLANS
S75W	1002	BASEMENT LEVEL 1 ENVELOPE PLANS
S75W	1003	GROUND FLOOR ENVELOPE PLANS
S75W	1004	LEVEL 1 ENVELOPE PLANS
S75W	1005	LEVEL 2 ENVELOPE PLANS
S75W	1006	LEVEL 3 ENVELOPE PLANS
S75W	1007	LEVEL 4 ENVELOPE PLANS
S75W	1008	LEVEL 5 ENVELOPE PLANS
S75W	1009	LEVEL 6 ENVELOPE PLANS
S75W	1010	LEVEL 7 ENVELOPE PLANS
S75W	1011	LEVEL 8 ENVELOPE PLANS
S75W	1012	ROOF ENVELOPE PLANS
S75W	1060	SITE PLAN
S75W	1070	GROUND FLOOR LANDSCAPE PLANS
S75W	1080	MASSING DIAGRAM
S75W	1101	ENVELOPE SECTIONS SHEET 1
S75W	1102	ENVELOPE SECTIONS SHEET 2
S75W	1201	ENVELOPE ELEVATIONS (NORTH & EAST)
S75W	1351	ENVELOPE PERSPECTIVE VIEWS SHEET 1
S75W	1352	ENVELOPE PERSPECTIVE VIEWS SHEET 2
S75W	1353	ENVELOPE PERSPECTIVE VIEWS SHEET 3
S75W	1354	ENVELOPE AXONOMETRIC VIEW
S75W	1651	SHADOW ANALYSIS SHEET 1
S75W	1652	SHADOW ANALYSIS SHEET 2
S75W	1653	SHADOW ANALYSIS SHEET 3
S75W	1654	SHADOW ANALYSIS SHEET 4
S75W	1655	SHADOW ANALYSIS SHEET 5
S75W	1801	DEVELOPMENT CALCULATIONS
S75W	1851	SEPP65 AMMENITY DIAGRAMS
S75W	1852	BUILDING HEIGHT ANALYSIS
S75W	1853	DRUMMOND HOUSE AMENITY DIAGRAMS

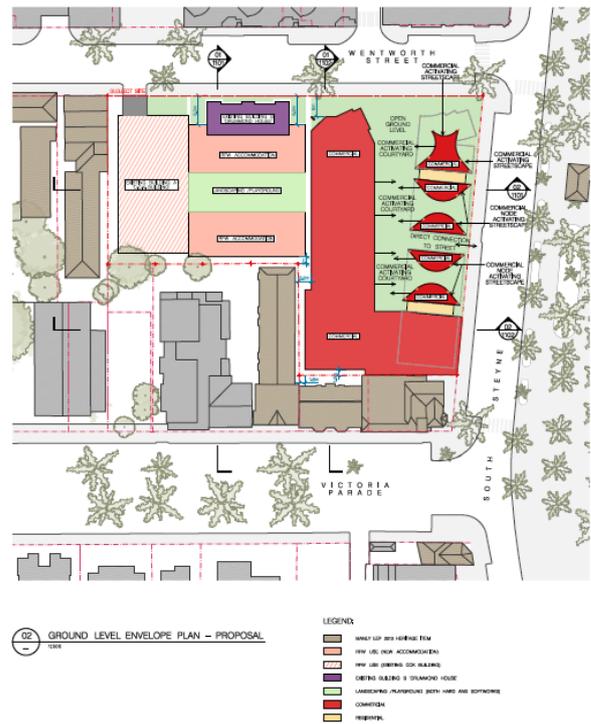
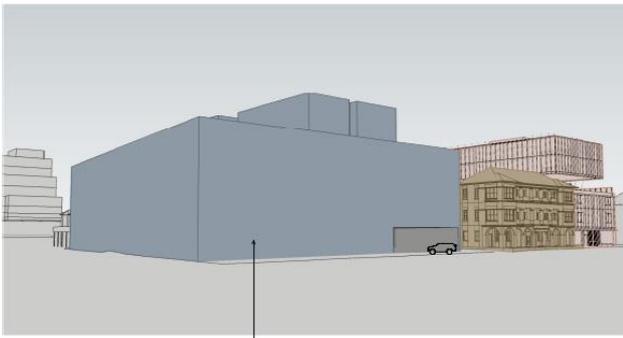


Figure 29 Extract of proposed plan – ground floor
Source: Murcutt Candalepas



Figure 30 Extract of proposed plan – Proposed view changes Wentworth Street
Source: Murcutt Candalepas



01 APPROVED 3A ENVELOPE VIEW
LOOKING WEST FROM SOUTH STEYNE



02 PROPOSED 3A ENVELOPE VIEW
LOOKING WEST FROM SOUTH STEYNE

Figure 31 Extract of proposed plan – Proposed view changes Wentworth Street
Source: Murcutt Candalepas

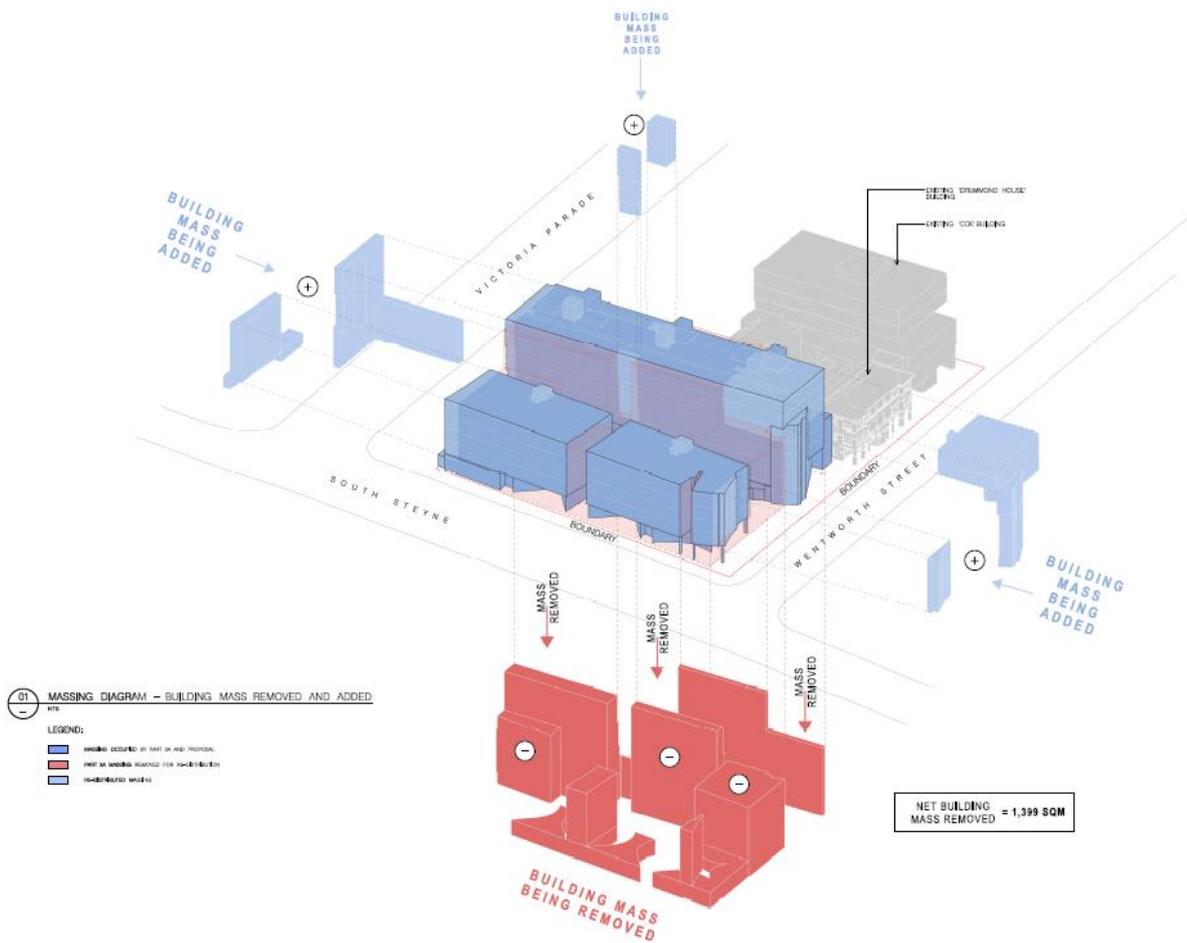
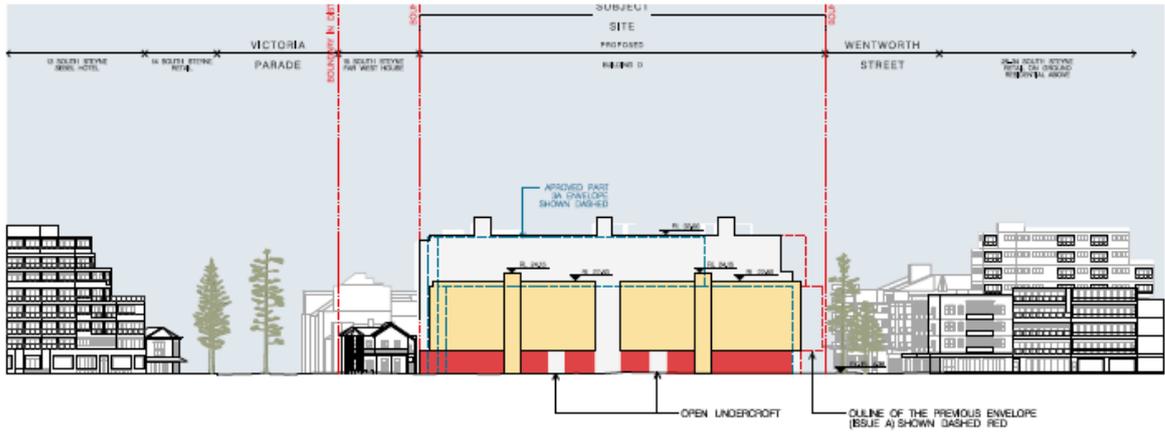
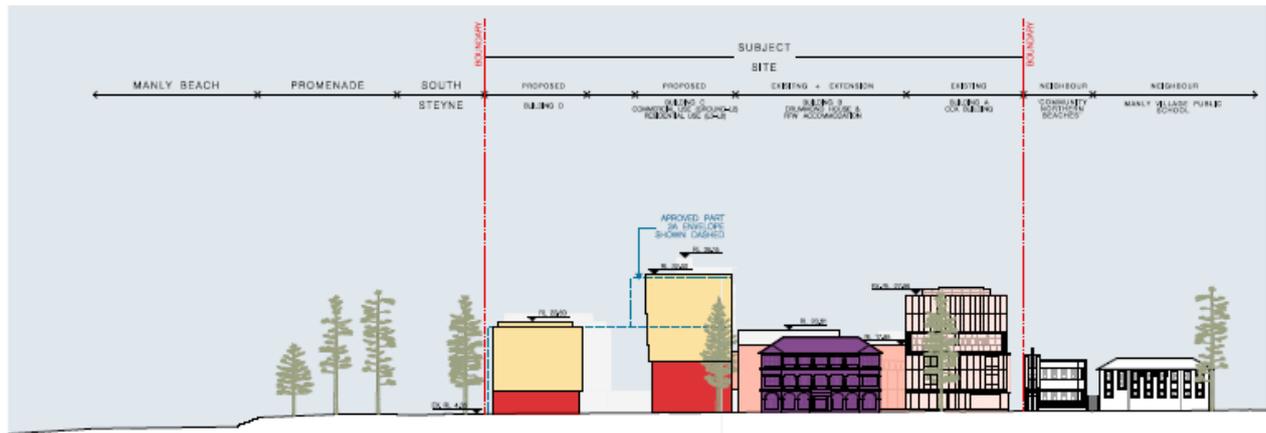


Figure 32 Extract of proposed plan – building mass diagram
Source: Murcutt Candalepas



01 EAST ELEVATION – SOUTH STEYNE
12589



02 NORTH ELEVATION – WENTWORTH STREET
12589

Figure 33 Extract of proposed plan – proposed elevations
Source: Murcutt Candalepas

6. IMPACT ASSESSMENT

The subject proposal seeks to amend the Part 3A envelope concept approval. This will facilitate future development including demolition and construction of new buildings. Accordingly, our assessment has been prepared with consideration for the future built works that the concept modification will facilitate.

6.1. MANLY LOCAL ENVIRONMENTAL PLAN 2013

Table 5 Assessment against the Manly Local Environmental Plan 2013

Clause	Discussion
<p>(2) Requirement for consent</p> <p><i>Development consent is required for any of the following:</i></p> <p><i>(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):</i></p> <p><i>(i) a heritage item,</i></p> <p><i>(ii) an Aboriginal object,</i></p> <p><i>(iii) a building, work, relic or tree within a heritage conservation area,</i></p> <p><i>(b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,</i></p> <p><i>(e) erecting a building on land:</i></p> <p><i>(i) on which a heritage item is located or that is within a heritage conservation area, or</i></p> <p><i>(ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance ...</i></p>	<p>The subject site includes a listed heritage item known as Item 245 described as The Drummond Far West Home, 22 Wentworth Street, and is located within the immediate vicinity of and is adjoining other heritage items of local significance. Accordingly, consent for the proposal is required under this clause.</p>
<p>(4) Effect of proposed development on heritage significance</p> <p><i>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</i></p>	<p>A detailed impact assessment is included hereunder in this report. The assessment concludes that the proposal will have an acceptable heritage impact.</p>

Clause	Discussion
<p>(5) Heritage assessment</p> <p><i>The consent authority may, before granting consent to any development:</i></p> <p><i>(a) on land on which a heritage item is located, or</i></p> <p><i>(b) on land that is within a heritage conservation area, or</i></p> <p><i>(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),</i></p> <p><i>require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</i></p>	<p>This heritage impact statement has been prepared to assess the potential heritage impacts of the proposal and to assist the consent authority in their determination. This heritage impact statement satisfies the requirement under this clause.</p>
<p>(6) Heritage conservation management plans</p> <p><i>The consent authority may require, after considering the heritage significance of a heritage item and the extent of change proposed to it, the submission of a heritage conservation management plan before granting consent under this clause.</i></p>	<p>A conservation management plan has been prepared for Drummond House (Urbis, 2020) which has guided the design development of the proposal and provides policies to manage change to the place. An assessment of the proposal against the policies of this conservation management plan is included in this report.</p>

6.2. MANLY DEVELOPMENT CONTROL PLAN 2013

Table 6 Assessment against the Manly Development Control Plan 2013

Clause	Discussion
PART 3.2 HERITAGE CONSIDERATIONS	
3.2.1 Consideration of Heritage Significance	
<p>3.2.1.1 Development in the vicinity of heritage items, or conservation areas</p> <p>a) In addition to LEP listings of Environmental Heritage (LEP Schedule 5), this DCP requires consideration of the effect on heritage significance for any other development in the vicinity of a heritage item or conservation area.</p>	<p>This heritage impact statement has been prepared to assess the potential heritage impacts of the proposal and to assist the consent authority in their determination. This heritage impact statement satisfies the requirement under this clause.</p>
<p>b) Proposed development in the vicinity of a heritage item or conservation area must ensure that:</p> <p>i) it does not detract or significantly alter the heritage significance of any heritage items, conservation area or place;</p>	<p>Apart from the Drummond House heritage item which is located within the subject site and is separately assessed below, the subject site adjoins and is located in the vicinity of a number of heritage items of local significance. The subject site is also located in the vicinity of the C2 Town Centre Conservation Area which is significant for its ability to demonstrate the development of the beach-side town centre. The proposal will not impact adversely on any of the heritage values associated with this conservation area.</p>
<p>ii) the heritage values or character of the locality are retained or enhanced; and</p>	<p>The heritage values and heritage items in the vicinity will be retained, with change only proposed to the Drummond House heritage item – all other heritage items will be retained. The character of the place will also be retained as the proposal is providing updated facilities for the existing Royal Far West institution only and there is no change of use required.</p>
<p>iii) any contemporary response may not necessarily seek to replicate heritage details or character of heritage buildings in the vicinity, but must preserve heritage significance and integrity with complementary and respectful building form, proportions, scale, style, materials, colours and finishes and building/street alignments.</p>	<p>The proposed extensions, additions and new buildings are wholly contemporary in their design and materiality, however have been designed to respond to the character of the precinct and the adjoining heritage items. The buildings will incorporate contemporary materials such as concrete and brass or bronze cladding which respond to the masonry materiality of the immediate heritage items including Drummond House and the Victorian building on South Steyne to the south of the site. The new buildings and additions will not replicate traditional or significant detailing or design, retaining a sense of hierarchy across the site and along the streetscape which provides an understanding of the various periods of development.</p>

Clause	Discussion
<p>c) The impact on the setting of a heritage item or conservation area is to be minimised by:</p> <p>i) providing an adequate area around the building to allow interpretation of the heritage item;</p>	<p>No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed. While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. The subject proposal seeks to replace existing Royal Far West buildings to provide an improved amenity and upgraded facilities that will enable the continuation of this historic use. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.</p>
<p>ii) retaining original or significant landscaping (including plantings with direct links or association with the heritage item);</p>	<p>The significant plantings along Wentworth Street and South Steyne outside of the subject property will be retained. No works are proposed that will affect significant vegetation.</p>
<p>iii) protecting (where possible) and allowing the interpretation of any archaeological features; and</p>	<p>It is beyond the scope of this report to assess the archaeological potential or archaeological impacts of the proposal. It is noted that the subject site will be excavated to provide for basement parking. The front principal wing form of Drummond House which is being retained will not be excavated underneath. The site has been highly disturbed through historic development of the existing Royal Far West facilities and buildings.</p>
<p>iv) retaining and respecting significant views to and from the heritage item</p>	<p>As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items.</p>

3.2.2 Alterations or Additions to Heritage Items or Conservation Areas

3.2.2.1 Complementary Form and Scale that Distinguishes Heritage Significance

a) Alterations or additions to heritage items or buildings within a conservation area will not necessarily seek to replicate, overwhelm, dominate or challenge heritage details or character of the building or structure of heritage significant buildings. However, a contemporary response which complements and respects the form and scale of the original buildings may be considered if the heritage significance is retained.

The subject proposal has been prepared to continue the important charitable institutional role of Drummond House and the associated facilities for Royal Far West. The proposal involves major change to the heritage listed Drummond House item, however with consideration for the state significant charitable use of the place, and the existing building providing inappropriate facilities to support this use, the proposal is considered to have an acceptable impact.

The rear wings of Drummond House will be demolished as part of this development for a number of reasons; they are not fit for purpose to support the significant charitable use of the place; they have been highly modified and provide a confused internal configuration; the subject site is being excavated to provide for underground parking

Clause	Discussion
	<p>and demolition of the rear wings is required to facilitate this use; and the existing outdoor play areas are insufficient to support the special needs of the children and families being supported by Royal Far West and the rear wings of Drummond House are an ideal location to provide a safe and secure outdoor environment for clients.</p> <p>The proposed additions to the principal front wing of Drummond House will be wholly contemporary in design and materiality and will not seek to replicate the traditional detailing of the original heritage item. The proposed new additions will embody a stepped / winged form facing south, which interprets and responds to the winged form of Drummond House's original building form.</p> <p>The proposed rear additions to Drummond House have been designed at a scale which will not dominate or overwhelm the retained portions of the heritage building. Extensions to the rear project to the sides and will read as contemporary and separate additions that will not detract from the principal original building form as they are appropriately setback.</p> <p>The proposed new building to the east of Drummond House within the subject site has been setback from Drummond House to provide adequate breathing room around the heritage item. The new building is marginally higher than but generally of the same scale as the recently constructed building to the immediate west of Drummond House, and therefore provides a consistent streetscape response to the heritage item along Wentworth Street. The northern elevation of this proposed new building has been carefully articulated to respond to the Drummond House building, by offsetting the north-eastern wing form away from Drummond House to provides a generous setback that enables continued views and appreciation of Drummond House.</p>

Clause	Discussion
<p>3.2.2.2 Retaining Significant Features and Landscape Setting.</p> <p><i>Note: Significant features in relation to this paragraph include roofs, detailing, brickwork, colours and original windows (size, proportion and type).</i></p> <p>Alterations or additions to heritage items or buildings within a conservation area must:</p> <p>a) retain original and traditional roof form, roof pitch with any alterations to the roofs to be sympathetic to the style of the heritage item or building within a conservation area;</p>	<p>The roof form to the front principal wing form of Drummond House is being retained and conserved. It is noted that this is not the original roof form but a later roof form that was added at a later date when the third storey was constructed. Nevertheless, this roof form will be retained. All roof forms on new buildings are contemporary.</p>
<p>b) retain original architectural detailing such as barge board, finial trim, window awnings and front verandas. New detailing must be complementary to the character of the item or place;</p>	<p>The front principal wing form of Drummond House, including the front northern verandas and architectural detailing will be retained and conserved. There are no significant architectural features in the rear wings that make a defining contribution to the significance of the item.</p>
<p>c) retain original wall treatments and original cladding (including slate). Modifications to face brick dwellings must use the original style of bricks, window heads, mortar joints and other building details;</p>	<p>The original wall treatment of Drummond House has been degraded through painting of what would previously have been decorative face brick.</p>
<p>d) not render or paint original face brickwork. In particular face brickwork where already so treated should be restored, where practical, to its original un-painted state;</p>	<p>No exposed brick or sandstone on Drummond House will be painted or rendered.</p>
<p>e) where surfaces are not originally face brickwork:</p> <p>i) any appropriate use of cement render is complementary to and consistent with the heritage architectural style and colour schemes and repainting must be articulated in the same manner as the original colour rendering of the building;</p> <p>ii) external colour schemes are to be in keeping with the original character of the heritage building based where possible on physical or documentary evidence in keeping with the architectural style and period of the building;</p> <p>iii) contemporary colours are not discouraged, but should be combined in a complementary way; and</p>	<p>Existing painted surfaces of Drummond House will be retained as painted surfaces.</p>

Clause	Discussion
iv) single colour solutions are not permitted;	
f) avoid removal of original fabric in order to retain the integrity of the heritage item or conservation area;	As previously discussed, the partial demolition of Drummond House is required to facilitate the ongoing Royal Far West charitable use of the place, which is noted in the Statement of Significance of the place as being of state significance, secondary to the significance of the building itself. The existing building is not fit for purpose as it contains a difficult internal layout without compliant access to all levels and rooms and has been haphazardly modified over time. The proposal seeks to rationalise the existing spaces and provide new updated and use appropriate buildings and facilities that support the charitable use, while also retraining those portions of Drummond House which make a defining contribution to the significance of the heritage item and which contribute to the character and significance of the streetscape and locality. The integrity of Drummond House as a charitable institution will be retained and enhanced. The proposed new buildings will not compete with the streetscape presence of the Drummond House building and therefore its contribution to the character of the precinct will be protected.
g) ensure that any new windows are to be inserted into the existing fabric of a heritage building and be of a size, proportion and type of window that is compatible with the building's architectural style/period as shown in Figure 7; and	No changes are proposed to the existing fenestration for the retained front principal portion of Drummond House.
h) retain and maintain contributory landscape settings for heritage items and ensure new landscaping is sympathetic to the heritage significance of the item or place	As above, all significant vicinity landscaping will be maintained. There is no significant vegetation on the subject site.
4.4.1 Demolition	
<p>Where development involves demolition, the applicant is to demonstrate that the degree of demolition considers any existing building on the land that should be retained and appropriately adapted in order to:</p> <p>b) Conserve the cultural heritage of the existing building and that of the locality. An appropriate assessment of potential heritage significance must accompany any DA in relation to demolition. If the property has merit as a potential heritage item, the heritage controls and considerations in this plan apply ...</p>	An assessment of significance for Drummond House has been undertaken in a Conservation Management Plan (Urbis 2020) to inform the preparation of this proposal and has been appended to this application. The statement of significance associated with Drummond House has been included in this report. None of the other existing buildings on the subject site are heritage listed.

6.3. HERITAGE NSW GUIDELINES

The proposed works are addressed in relation to relevant questions posed in Heritage NSW's (former Heritage Office / Heritage Division) 'Statement of Heritage Impact' guidelines.

Table 7 Assessment against the Heritage NSW Guidelines

Clause	Discussion
<p>The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:</p>	<p>The proposal has been assessed in detail in this report and is considered to have an acceptable heritage impact for the following reasons:</p> <p>The buildings to be demolished include the Royal Far West School (three storey brick building) and the WOTSO brick and concrete building to South Steyne. These two buildings are later twentieth century structures which require updating or replacement to provide adequate facilities for the Royal Far West institution. Neither of these buildings are heritage listed and they are not required to be retained on heritage grounds.</p> <p>The rear wings of Drummond House will be demolished as part of this development for a number of reasons; they are not fit for purpose to support the significant charitable use of the place; they have been highly modified and provide a confused internal configuration; the subject site is being excavated to provide for underground parking and demolition of the rear wings is required to facilitate this use; and the existing outdoor play areas are insufficient to support the special needs of the children and families being supported by Royal Far West and the rear wings of Drummond House are an ideal location to provide a safe and secure outdoor environment for clients.</p> <p>The proposal seeks to rationalise the existing spaces and provide new updated and use appropriate buildings and facilities that support the charitable use, while also retraining those portions of Drummond House which make a defining contribution to the significance of the heritage item and which contribute to the character and significance of the streetscape and locality.</p> <p>Despite the proposed partial demolition, the integrity of Drummond House as a charitable institution will be retained and enhanced. The proposed new buildings to the east and west, along with the proposed additions to the rear of the retained portions of Drummond House, will not compete with the streetscape presence of the Drummond House building and therefore its contribution to the character of the precinct will be protected.</p>

Clause	Discussion
	<p>While there is an acknowledged heritage impact as a result of the partial demolition of Drummond House, the principal elements of this modified building which make a defining contribution to its physical significance are being retained, and this heritage impact is considered acceptable with consideration for the greater positive heritage outcome of the continued and improved Royal Far West charitable institutional use, which is identified to be of state significance.</p> <p>The proposed extensions, additions and new buildings are wholly contemporary in their design and materiality, however have been designed to respond to the character of the precinct and the adjoining heritage items. The buildings will incorporate contemporary materials such as concrete and brass or bronze cladding which respond to the masonry materiality of the immediate heritage items including Drummond House and the Victorian building on South Steyne to the south of the site. The new buildings and additions will not replicate traditional or significant detailing or design, retaining a sense of hierarchy across the site and along the streetscape which provides an understanding of the various periods of development.</p> <p>No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed. While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.</p> <p>The subject site is also located in the vicinity of the C2 Town Centre Conservation Area which is significant for its ability to demonstrate the development of the beach-side town centre. The proposal will not impact adversely on any of the heritage values associated with this conservation area.</p>

Clause	Discussion
<p>The following aspects of the proposal could detrimentally impact on heritage significance.</p> <p>The reasons are explained as well as the measures to be taken to minimise impacts:</p>	<p>While there is an acknowledged heritage impact as a result of the partial demolition of Drummond House, the principal elements of this modified building which make a defining contribution to its physical significance are being retained, and this heritage impact is considered acceptable with consideration for the greater positive heritage outcome of the continued and improved Royal Far West charitable institutional use, which is identified to be of state significance.</p>
<p>The following sympathetic solutions have been considered and discounted for the following reasons:</p>	<p>Adaptive reuse of the existing Drummond House building was considered as the initial option to provide updated facilities for the Royal Far West charitable institution. However, the existing building configuration provides an inadequate layout for adaptive reuse and the internal spaces are insufficient to accommodate the necessary services. Further, the existing building is not access compliant, and given the winged form of the building providing upgraded services for compliant access would be very difficult and would require substantial intervention. With consideration for the principal significance of the place vested in its historical and continued charitable use, and the lesser significance of the building fabric, alternate options with a higher degree of intervention to achieve the required upgrade outcome have been considered and adopted.</p>
<p>Demolition of a building or structure</p> <p>Have all options for retention and adaptive re-use been explored?</p> <p>Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?</p> <p>Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?</p> <p>Has the advice of a heritage consultant been sought? Have the consultant's recommendations been implemented? If not, why not?</p>	<p>Besides Drummond House, the proposal requires the demolition of the existing buildings across the subject site (excepting the newly constructed building at 18 Wentworth Street which forms part of the larger Royal Far West site). The buildings to be demolished include the Royal Far West School (three storey brick building) and the WOTSO brick and concrete building to South Steyne. These two buildings are later twentieth century structures which require updating or replacement to provide adequate facilities for the Royal Far West institution. Neither of these buildings are heritage listed and they are not required to be retained on heritage grounds.</p>
<p>Major partial demolition</p> <p>Is the demolition essential for the heritage item to function?</p>	<p>The rear wings of Drummond House will be demolished as part of this development for a number of reasons; they are not fit for purpose to support the significant charitable use of the place; they have been highly modified and provide a confused internal configuration; the subject site is being excavated to provide for underground parking</p>

Clause	Discussion
<p>Are particular features of the item affected by the demolition (e.g. fireplaces in buildings)?</p> <p>Is the detailing of the partial demolition sympathetic to the heritage significance of the item (e.g. creating large square openings in internal walls rather than removing the wall altogether)?</p> <p>If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?</p> <p>How is the impact of the addition on the heritage significance of the item to be minimised?</p> <p>Can the additional area be located within an existing structure? If no, why not?</p> <p>Will the additions visually dominate the heritage item?</p> <p>Is the addition sited on any known or potentially significant archaeological deposits?</p> <p>Is the resolution to partially demolish sympathetic to the heritage significance of the item?</p> <p>If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?</p>	<p>and demolition of the rear wings is required to facilitate this use; and the existing outdoor play areas are insufficient to support the special needs of the children and families being supported by Royal Far West and the rear wings of Drummond House are an ideal location to provide a safe and secure outdoor environment for clients.</p> <p>The proposed demolition of the rear wings of Drummond House is limited to the removal of fabric of secondary importance when compared with the front block and principal elevation, which is generally the only area of the building that makes a defining contribution to the Inter-War Classical style design of the place (albeit, also highly modified). The rear wings of Drummond House, proposed for removal are not required to be retained in order to understand and appreciate the identified heritage significance of the place, being its state-significant function as an on-going charitable institution and its representative value as an Inter-War Classical style building, evidenced by the principal elevation.</p> <p>The revised CMP grades this rear wing fabric as having 'Moderate Significance' only, and as such the removal of this fabric will not affect any fabric of Exceptional or High heritage significance.</p> <p>The partial demolition of Drummond House is required to facilitate the ongoing Royal Far West charitable use of the place, which is noted in the Statement of Significance of the place as being of state significance, secondary to the significance of the building itself. The existing building is not fit for purpose as it contains a difficult internal layout without compliant access to all levels and rooms and has been haphazardly modified over time.</p> <p>The proposal seeks to rationalise the existing spaces and provide new updated and use appropriate buildings and facilities that support the charitable use, while also retraining those portions of Drummond House which make a defining contribution to the significance of the heritage item and which contribute to the character and significance of the streetscape and locality.</p> <p>Despite the proposed partial demolition, the integrity of Drummond House as a charitable institution will be retained and enhanced. The proposed new buildings to the east and west, along with the proposed additions to the rear of the retained portions of Drummond House, will not compete with the streetscape presence of the</p>

Clause	Discussion
	<p>Drummond House building and therefore its contribution to the character of the precinct will be protected.</p> <p>While there is an acknowledged heritage impact as a result of the partial demolition of Drummond House, the principal elements of this modified building which make a defining contribution to its physical significance are being retained, and this heritage impact is considered acceptable with consideration for the greater positive heritage outcome of the continued and improved Royal Far West charitable institutional use, which is identified to be of state significance.</p>
<p>Change of use</p> <p>Has the advice of a heritage consultant or structural engineer been sought?</p> <p>Has the consultant's advice been implemented? If not, why not?</p> <p>Does the existing use contribute to the significance of the heritage item?</p> <p>Why does the use need to be changed?</p> <p>What changes to the fabric are required as a result of the change of use?</p> <p>What changes to the site are required as a result of the change of use?</p>	<p>The proposed charitable institutional use will not change, and the proposal's intention is to facilitate the continuation of the Royal Far West use of the site with enhanced facilitates providing an improved service to clients in need.</p>
<p>New development adjacent to a heritage item</p> <p>How does the new development affect views to, and from, the heritage item?</p> <p>What has been done to minimise negative effects?</p> <p>How is the impact of the new development on the heritage significance of the item or area to be minimised?</p> <p>Why is the new development required to be adjacent to a heritage item?</p> <p>How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?</p> <p>Is the development sited on any known, or potentially significant archaeological deposits?</p>	<p>The proposal is across a site which is located within close proximity to and adjoins a number of heritage items. Along Wentworth Street, the proposal site adjoins the Former School of Arts at 12 Wentworth Street (Item 244). However, it is noted that a new building has been constructed at 18 Wentworth Street as part of the previous approval for the site and provides a visual and physical barrier between the heritage item and Drummond House.</p> <p>Excavation is required adjacent to the retained portions of Drummond House to achieve the proposed basement car parking. James Taylor & Associates structural engineers have prepared a methodology to protect the Drummond House item and the adjoining heritage items during excavation including installing permeate sand to a depth of 3 metres. Therefore the existing significant buildings and the retained portions of Drummond House</p>

Clause	Discussion
If so, have alternative sites been considered? Why were they rejected?	will be structurally protected during the excavation and development.
Is the new development sympathetic to the heritage item?	No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed.
In what way (e.g. form, siting, proportions, design)?	While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.
Will the additions visually dominate the heritage item?	
How has this been minimised?	
Will the public, and users of the item, still be able to view and appreciate its significance?	
	The subject site is also located in the vicinity of the C2 Town Centre Conservation Area which is significant for its ability to demonstrate the development of the beach-side town centre. The proposal will not impact adversely on any of the heritage values associated with this conservation area.

6.4. RESPONSES TO COUNCIL FEEDBACK

Council's pre-lodgement meeting feedback identified a number of issues of concern regarding the protection of the heritage significance of Drummond House. The following table contains the "Main issues of concern" raised by Council and summarised in their letter, with Urbis' responses. This response has already been provided to Council.

Table 8 Heritage Responses to Council Feedback

Council Comment	Response
<p>Main issues of concern:</p> <p>1. Non-compliance with Part 3A Concept Approval and accompanying CMP and HIS;</p>	<p>The Conservation Management Strategy (CMS) for Drummond House was prepared by Urbis in 2011. This document requires substantial updating to reflect current best heritage practice, to reflect the owner's requirements and to ensure that the document appropriately manages the identified significance of the place.</p> <p>Urbis has prepared an updated and expanded comprehensive Conservation Management Plan (CMP) for the place. This CMP includes a more comprehensive review of the assessment of significance and gradings of significance to reflect the existing fabric of Drummond House, and a review of conservation policy to ensure the heritage values of the place are appropriately managed and protected in view of safeguarding on-going use and future redevelopment of the site and surrounding properties.</p> <p>The updated CMP provides a comprehensive foundation to properly manage the identified significance of the place, which as outlined in this report, is <u>primarily</u> vested in its operation as a charitable institution and secondarily vested in its Inter-War Classical style.</p> <p>The proposed Stage 2 proposal will reflect the updated CMP policies, and the works have been against these policies in this report.</p> <p>Urbis considers that the proposed updated CMP will be sufficient to appropriately manage the significance of the place in the context of its on-going use.</p>
<p>2. The extent of proposed demolition of Drummond House</p>	<p>Drummond House is a highly modified inter-war building which has been subject to numerous rounds of major changes over the years. The original form and fabric of the building is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations.</p> <p>The proposed demolition of the rear wings of Drummond House is limited to the removal of fabric of secondary importance when compared with the front block and principal elevation, which is generally the only area of the building that makes a defining contribution to the Inter-War Classical style design of the place (albeit, also highly modified). The rear wings of Drummond House, proposed for removal are not required to be retained in order to understand</p>

Council Comment	Response
	<p>and appreciate the identified heritage significance of the place, being its state-significant function as an on-going charitable institution and its representative value as an Inter-War Classical style building, evidenced by the principal elevation.</p> <p>The revised CMP grades this rear wing fabric as having 'Moderate Significance' only, and as such the removal of this fabric will not affect any fabric of Exceptional or High heritage significance.</p> <p>Further the proposed new rear additions to Drummond House have adopted a rhythmic wing form that interprets the wing form of the fabric proposed for demolition. This approach allows for an understanding of and sympathetic response to the original design and form of the building while still being able to facilitate reasonable on-going use while retaining the highly significant front portion of Drummond House.</p> <p>We have been assured that the current buildings are not fit for use. The proposal has been developed to provide for a particular and highly sensitive use which includes the protection of vulnerable children. The proposal provides for an internal courtyard space for children to safely play in, and this design is only achievable on the site through the removal of the rear wings of Drummond House. The provision of these facilities is critical to the continued operation of Royal Far West as a place of respite and security. As the primary heritage significance of the place is vested in its state-significant long term operation as a charitable institution, the proposal is considered acceptable and appropriate from a heritage perspective as it safeguards these operations, allowing them to continue into the future and adapt as required to meet the evolving demands of this important institution.</p> <p>The potential impact of the removal of the rear wing fabric of this heritage item is substantially outweighed by the longer term benefit to the operations of Royal Far West and the protection of the state-significance of this place as a long running charitable institution.</p>
<p>3. Setback of the new building proposed to the east of Drummond House from Wentworth Street (should be 6 metres);</p>	<p>The new building to the east of Drummond House is setback further from the street frontage than Drummond House itself and provides an appropriate response to the streetscape and the heritage item. The wing form which projects north from this building has no detrimental impact on Drummond House building or views to or from it as this element has been angled away from Drummond House, providing an appropriate physical buffer.</p> <p>The new ground floor layout has been prepared to respond to the Council's concerns regarding setback and provides a larger area of breathing space around the Drummond House building to appreciate the original building form and setting. A larger setback from the street is not considered necessary and is not considered that it would result in a marked difference in the streetscape or views.</p> <p>Urbis considers that this setback is appropriate and would not have an adverse heritage impact on Drummond House.</p>

Council Comment	Response
<p>4. Inadequate separation between this new building and Drummond House (should be 6-7 metres);</p>	<p>The new building has been adequately set back from Drummond House and is appropriate in the context of the broader existing development in the streetscape. The new ground floor layout has been prepared to respond to the Council's concerns regarding setback and provides a larger area of breathing space around the Drummond House building to appreciate the original building form and setting. A larger setback between Drummond House and the new building would not result in a marked difference in streetscape character or views. Further, a larger setback would have detrimental impacts on the overall form and design of the new building and would compromise the proposed spaces intended to facilitate the ongoing charitable institution use of the place. The setback applied between Drummond House and the new building aligns with the existing setback between Drummond House and the 'Stage 1 CCK Building' located to the west of Drummond House, and therefore adopts an appropriate symmetry to the overall site design.</p> <p>Urbis considers that this setback is appropriate and would not have an adverse heritage impact on Drummond House.</p>
<p>5. Proposed changes for main entry on new building to the south (no fins or projections into building setback – consider removing existing façade treatment);</p>	<p>The proposal and the new building have been designed by two of Australia's preeminent and celebrated architects, Glenn Murcutt and Angelo Candalepas, and represents a high degree of design excellence. The proposal is finely detailed and carefully considers the heritage context within which the new buildings sit and has been designed by esteemed architects. The proposed detailing of the new building in proximity to Drummond House will have no detrimental impacts on the heritage item as it provides appropriate setbacks (as discussed above) and will have no detrimental visual impacts on views to the heritage item. The design is contemporary but utilises traditional materials in a modern format to respond to the heritage character of the area.</p> <p>Urbis considers that the proposed detailing of the new building is appropriate and would not have an adverse heritage impact on Drummond House. We also consider that the new work, of design excellence, is very likely to be recognised as an important historic layer in the future.</p>
<p>6. Inadequate setback to Terraces at 15-16 South Steyne;</p>	<p>The proposed new building on South Steyne adopts a similar setback from the terraces as currently exists with the Royal Far West brick and concrete building. This setback is considered acceptable from a heritage perspective and is not considered to have a cumulative impact on the adjoining terraces compared with the existing built context of the area.</p> <p>Urbis considers that the proposed setback of the new building to the terraces is appropriate and would not have an adverse heritage impact on the historic terraces.</p>
<p>7. New building to east of Drummond House cuts off existing views of the building when viewed from the street and beyond (building is currently</p>	<p>The views towards the heritage item from the ocean front reserve are oblique and while including the principal elevation, are primarily focused on the secondary side elevation of the building which is of substantially lesser significance. The proposed new building to the east of Drummond House has adopted an appropriate setback from the street front and is located</p>

Council Comment	Response
<p>viewed in 3-D from the oceanfront reserve);</p>	<p>behind the front building line of Drummond House (see above discussion in this letter). The new ground floor layout has been prepared to respond to the Council's concerns regarding setback and provides a larger area of breathing space around the Drummond House building to appreciate the original building form and setting. Oblique views of Drummond House will still be available from the ocean front reserve and from along Wentworth Street and South Steyne.</p> <p>Urbis considers that the proposed the new building is appropriate and would not have an adverse heritage impact on existing oblique views towards Drummond House.</p>
<p>There is an opportunity with the proposed development to celebrate the last remaining heritage item on the Royal Far West site. It should not be demolished, and new buildings should provide some curtilage so that it is clearly visible in the streetscape as the original Royal Far West building.</p>	<p>The Drummond House heritage item, including elements which make a defining contribution to its identified heritage significance, will be retained and conserved.</p> <p>It is envisaged that as part of future built works applications, a heritage interpretation strategy would be implemented to facilitate the understanding and celebration of the significance and important charitable institutional use of the place.</p> <p>Archival recording will be undertaken to appropriately record the heritage item prior to major change being undertaken.</p> <p>Drummond House will remain as a dominant historical element in the streetscape and will not be detrimentally affected by the new surrounding development which has been designed to be refined and respond appropriately to the site while facilitating Royal Far West's important operational needs.</p>

6.5. DRUMMOND HOUSE CONSERVATION MANAGEMENT POLICY

The proposed works are addressed in relation to relevant policies in the Conservation Management Plan for Drummond House (Urbis, 2020).

Table 9 Assessment against the Heritage NSW Guidelines

Policy	Response
<p>Policy 13. Any proposed use of Drummond House should be compatible with the nature and significance of the building.</p>	<p>The proposed charitable institutional use will not change, and the proposal's intention is to facilitate the continuation of the Royal Far West use of the site with enhanced facilities providing an improved service to clients in need.</p>
<p>Policy 14. Future changes should support the ongoing charitable institutional use of the place. The protection and facilitation of the current charitable institutional use is a primary aspect of the significance of the place and this use should be enhanced where possible.</p>	<p>The proposal will protect and facilitate the continuation of the Royal Far West charitable institutional use and therefore safeguard this principal aspect of the heritage significance of the place. While there is an acknowledged heritage impact as a result of the partial demolition of Drummond House, the principal elements of this modified building which make a defining contribution to its physical significance are being retained, and this heritage impact is considered acceptable with consideration for the greater positive heritage outcome of the continued and improved Royal Far West charitable institutional use, which is identified to be of state significance.</p>
<p>Policy 15. Ancillary and supporting uses are appropriate if they facilitate the primary charitable use of the building.</p>	<p>As above, the proposed use is not changing for Drummond House, however the alterations and additions are providing for upgraded and new ancillary facilities to support the function of the place, including communal rooms and accommodation.</p>
<p>Policy 16. Alternative uses if required should have regard to the significant historical use of the place and should enable the continued interpretation and celebration of this use.</p>	<p>The proposal will facilitate the ongoing historical use of the place which underpins the interpretation of the place.</p>
<p>Policy 17. If alternative uses are required for the place, it would be preferable to retain a section of the building for a community-service based use which reflects the site's significant historical use and contribution to the local community and New South Wales more broadly.</p>	<p>The retained portions of Drummond House are being retained as a fundamental part of the Royal Far West charitable institution, and will continue to provide vital services to the community and for children and families in need.</p>
<p>Policy 22. Retention of the existing floor plate of Drummond House in its current configuration is not necessary as it is not fit for purpose to support the primary charitable institutional use of the place. The winged form of the original building should be understood and interpreted as part of future works.</p>	<p>Drummond House is a highly modified inter-war building which has been subject to numerous rounds of major changes over the years. The original form and fabric of the building is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form</p>

Policy

Response

and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations.

The proposed demolition of the rear wings of Drummond House is limited to the removal of fabric of secondary importance when compared with the front block and principal elevation, which is generally the only area of the building that makes a defining contribution to the Inter-War Classical style design of the place (albeit, also highly modified). The rear wings of Drummond House, proposed for removal are not required to be retained in order to understand and appreciate the identified heritage significance of the place, being its state-significant function as an on-going charitable institution and its representative value as an Inter-War Classical style building, evidenced by the principal elevation.

The revised CMP grades this rear wing fabric as having 'Moderate Significance' only, and as such the removal of this fabric will not affect any fabric of Exceptional or High heritage significance.

Further the proposed new rear additions to Drummond House have adopted a rhythmic wing form that interprets the wing form of the fabric proposed for demolition. This approach allows for an understanding of and sympathetic response to the original design and form of the building while still being able to facilitate reasonable on-going use while retaining the highly significant front portion of Drummond House.

We have been assured that the current buildings are not fit for use. The proposal has been developed to provide for a particular and highly sensitive use which includes the protection of vulnerable children. The proposal provides for an internal courtyard space for children to safely play in, and this design is only achievable on the site through the removal of the rear wings of Drummond House. The provision of these facilities is critical to the continued operation of Royal Far West as a place of respite and security. As the primary heritage significance of the place is vested in its state-significant long term operation as a charitable institution, the proposal is considered acceptable and appropriate from a heritage perspective as it safeguards these operations, allowing

Policy	Response
<p>Policy 23. The front principal wing form of Drummond House over all three levels should be retained and conserved.</p>	<p>them to continue into the future and adapt as required to meet the evolving demands of this important institution.</p> <p>The potential impact of the removal of the rear wing fabric of this heritage item is substantially outweighed by the longer term benefit to the operations of Royal Far West and the protection of the state-significance of this place as a long running charitable institution.</p>
<p>Policy 24. There should be no modifications to the fenestration of the front principal wing form and no new openings.</p>	<p>As discussed above, the front wing form of Drummond House is being retained and adaptively reused as part of the proposal. The new rear additions are setback from this wing to enable adequate interpretation of the original building form and fabric.</p>
<p>Policy 25. No vertical additions are permissible above the front principal wing form of Drummond House.</p>	<p>There are no changes proposed to the existing fenestration of the principal front wing form of Drummond House, which is being retained.</p>
<p>Policy 26. Future works should seek to restore the external architectural elements to the principal Wentworth Street elevation, including exposure of face brickwork, conservation of original columns, balustrade and joinery and other finishes.</p>	<p>No vertical additions are proposed as part of the proposal above the retained portions of the existing Drummond House building. New rear additions are proposed however these are of a complementary scale to Drummond House to avoid visual domination of the heritage item from the streetscape and public domain.</p>
<p>Policy 27. There is an opportunity in redeveloping the Drummond House property to replace the existing rear additions and areas of lesser significance with a new addition which is fit for purpose and safeguards the ongoing charitable institutional use of the place.</p>	<p>The front principal wing of Drummond House is being retained and protected during construction and is being adaptively reused as part of the larger Royal Far West operations across the site. The building will retain all significant architectural features on the exterior of the wing, however internally all fabric will be removed to facilitate a new layout. This is considered acceptable as the internal configuration currently provides a confused and highly modified interior of little heritage significance.</p>
<p>Policy 28. Major change and new additions must be located to the rear of the front principal wing form of Drummond House. The front wing form of Drummond</p>	<p>As discussed above, the rear wings of Drummond House are being removed and replaced with new additions which provide an improved level of amenity for the clients of Royal Far West, and to provide compliant access and appropriate internal courtyard playground facilities for children which are secure and safe. These changes are safeguarding the continued and historical significant Royal Far West use of the place.</p>
<p>Policy 28. Major change and new additions must be located to the rear of the front principal wing form of Drummond House. The front wing form of Drummond</p>	<p>As discussed above, the front principal wing form is being retained and integrated into the broader development to be meaningfully adaptively reused.</p>

Policy	Response
<p>House must be retained and meaningfully integrated into new development.</p> <p>Policy 29. Any major change should be evident as new work to distinguish between the original building fabric and new additions and should be contemporary in design. New work should not replicate traditional detailing or the design of Drummond House.</p>	<p>The proposed extensions, additions and new buildings are wholly contemporary in their design and materiality, however have been designed to respond to the character of the precinct and the adjoining heritage items. The buildings will incorporate contemporary materials such as concrete and brass or bronze cladding which respond to the masonry materiality of the immediate heritage items including Drummond House and the Victorian building on South Steyne to the south of the site. The new buildings and additions will not replicate traditional or significant detailing or design, retaining a sense of hierarchy across the site and along the streetscape which provides an understanding of the various periods of development.</p>
<p>Policy 30. New additions should respect the history of the original Morrow & Gordon Drummond House by being equal in terms of architecture and quality.</p>	<p>The proposal and the new building have been designed by two of Australia's preeminent and celebrated architects, Glenn Murcutt and Angelo Candalepas, and represents a high degree of design excellence. The proposal is finely detailed and carefully considers the heritage context within which the new buildings sit and has been designed by esteemed architects.</p> <p>The proposed extensions, additions and new buildings are wholly contemporary in their design and materiality, however have been designed to respond to the character of the precinct and the adjoining heritage items. The buildings will incorporate contemporary materials such as concrete and brass or brass or bronze cladding which respond to the masonry materiality of the immediate heritage items including Drummond House and the Victorian building on South Steyne to the south of the site. The new buildings and additions will not replicate traditional or significant detailing or design, retaining a sense of hierarchy across the site and along the streetscape which provides an understanding of the various periods of development.</p> <p>The proposed detailing of the new building in proximity to Drummond House will have no detrimental impacts on the heritage item as it provides appropriate setbacks (as discussed above) and will have no detrimental visual impacts on views to the heritage item. The design is contemporary but utilises traditional materials in a modern format to respond to the heritage character of the area.</p>

Policy	Response
<p>Policy 31. The massing, scale and height of any new development on the Royal Far West site should consider the character and relationship to the mass, scale and height of heritage buildings on the site and in the vicinity.</p>	<p>Urbis considers that the proposed detailing of the new building is appropriate and would not have an adverse heritage impact on Drummond House. We also consider that the new work, of design excellence, is very likely to be recognised as an important historic layer in the future.</p> <p>No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed. While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.</p> <p>Along Wentworth Street, the proposal site adjoins the Former School of Arts at 12 Wentworth Street (Item 244). However, it is noted that a new building has been constructed at 18 Wentworth Street as part of the previous approval for the subject site and provides a visual and physical barrier between the heritage item and Drummond House. The new development on South Steyne adjoining the heritage item (Item 226), a Victorian house at 15–16 South Steyne, effectively replaces an existing late twentieth century concrete building with a new development with a more consistent streetscape response. This new building is setback from the Victorian heritage item to provide appropriate distancing. There is no marked change in terms of heritage impact on the Victorian item between the existing building to the new building, apart from an improved streetscape response in design and amenity. The buildings are of a similar scale and the new building provides a larger setback from the heritage item, and is therefore considered to provide an overall improved heritage outcome.</p>
<p>Policy 32. Any required roof plant should be minimal and located to minimise visual impacts. Any works should not adversely impact on significant views.</p>	<p>All roof plant is located on new buildings and not on the retained portions of Drummond House.</p>
<p>Policy 33. Finishes never intended for painting, such as the stone and brick façades and bronze elements, should remain unpainted. Where these surfaces have been painted, all efforts should be made to expose these materials and restore these finishes.</p>	<p>All existing unpainted surfaces will remain unpainted.</p>

Policy	Response
<p>Policy 34. New works to the place should include a considered landscape plan to the principal elevation having regard to traditional plantings associated with the building and inter war period.</p>	<p>The proposal includes a landscape response along South Steyne underneath the under croft of the proposed new building and provides for an increase in plantings on the subject site. Further the proposal provides for the relocation and upgrade of the existing children's playground area from the Wentworth Street frontage to an internal courtyard location which provides improved security and safety for vulnerable clients.</p>
<p>Policy 35. External signage on the original building form should be minimal and limited to fixed plaque signage fixed into mortar joints only.</p>	<p>No new signage is proposed on the Drummond House building.</p>
<p>Policy 36. External lighting should be minimal and sympathetic to the heritage character of the place.</p>	<p>No new lighting is proposed to the exterior of the Drummond House retained portions.</p>
<p>Policy 37. New services should not be attached to the significant facades of the building.</p>	<p>New services are located within the proposed new additions and new buildings.</p>
<p>Policy 38. The internal spaces can be reconfigured and upgraded to meet the changing needs of the place, particularly if this change facilitates the ongoing charitable institutional use of the place and as long as this change does not adversely impact on any external significant fabric or building form.</p>	<p>The existing building configuration provides an inadequate layout for adaptive reuse and the internal spaces are insufficient to accommodate the necessary services. Further, the existing building is not access compliant, and given the winged form of the building providing upgraded services for compliant access would be very difficult and would require substantial intervention. With consideration for the principal significance of the place vested in its historical and continued charitable use, and the lesser significance of the building fabric, options with a higher degree of intervention to achieve the required upgrade outcome have been considered and adopted. The exterior of the principal front wing form is being retained, and the interior is being adaptively reused and reconfigured to provide improved facilities to service clients of Royal Far West. These changes facilitate the ongoing charitable institutional use of the place and does not adversely impact on external significant fabric or building form of Drummond House.</p>
<p>Policy 39. Adaptive reuse of internal spaces should respond to the fenestration of the original building form as appropriate and seek to interpret original spatial configurations where possible.</p>	<p>No changes to fenestration along the principal elevation of the retained portion of Drummond House are proposed.</p>

Policy

Policy 48. Any development on the Royal Far West site should consider and respect the streetscape character and landscape significance of Wentworth Street, South Steyne and Victoria Parade and key views to other heritage items in the vicinity.

Policy 49. New development should not detract from or obscure the principal Wentworth Street facing elevation of Drummond House. Any proximate redevelopment should be of an appropriate scale to respect the setting.

Response

No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed. While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.

Along Wentworth Street, the proposal site adjoins the Former School of Arts at 12 Wentworth Street (Item 244). However, it is noted that a new building has been constructed at 18 Wentworth Street as part of the previous approval for the subject site and provides a visual and physical barrier between the heritage item and Drummond House. The new development on South Steyne adjoining the heritage item (Item 226), a Victorian house at 15–16 South Steyne, effectively replaces an existing late twentieth century concrete building with a new development with a more consistent streetscape response. This new building is setback from the Victorian heritage item to provide appropriate distancing. There is no marked change in terms of heritage impact on the Victorian item between the existing building to the new building, apart from an improved streetscape response in design and amenity. The buildings are of a similar scale and the new building provides a larger setback from the heritage item, and is therefore considered to provide an overall improved heritage outcome.

The proposed new development including demolition of the rear wings of Drummond House, new additions to the rear of this retained portion of the building, and new adjacent buildings, will not obscure the understanding or interpretation of the principal elevation of Drummond House.

The proposed rear additions to Drummond House have been designed at a scale which will not dominate or overwhelm the retained portions of the heritage building. Extensions to the rear project to the sides and will read as contemporary and separate additions that will not detract from the principal original building form as they are appropriately setback.

Policy	Response
	<p>The proposed new building to the east of Drummond House within the subject site has been setback from Drummond House to provide adequate breathing room around the heritage item. The new building is marginally higher than but generally of the same scale as the recently constructed building to the immediate west of Drummond House, and therefore provides a consistent streetscape response to the heritage item along Wentworth Street. The northern elevation of this proposed new building has been carefully articulated to respond to the Drummond House building, by offsetting the north-eastern wing form away from Drummond House to provides a generous setback that enables continued views and appreciation of Drummond House.</p>

7. CONCLUSION AND RECOMMENDATIONS

The subject proposal seeks to amend the Part 3A concept envelope approval. This will facilitate future development including demolition and construction of new buildings. Accordingly, our assessment has been prepared with consideration for the future built works that the concept modification will facilitate.

Overall, the proposal is considered to have an acceptable heritage impact for the following reasons:

- Non heritage listed buildings to be demolished include the Royal Far West School (three storey brick building) and the WOTSO brick and concrete building to South Steyne. These two buildings are later twentieth century structures which require updating or replacement to provide adequate facilities for the Royal Far West institution. Neither of these buildings are heritage listed and they are not required to be retained on heritage grounds.
- Drummond House (a listed heritage item) is a highly modified inter-war building which has been subject to numerous rounds of major changes over the years. The original form and fabric of the building is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations.
- Royal Far West who has operated on the subject site for in excess of 95 years, has advised that the current buildings, and in particular Drummond House, are not fit for use. This proposal has been prepared to provide for a particular and highly sensitive use which includes the protection of vulnerable children. The provision of upgraded and fit-for-purpose facilities is critical to the continued operation of Royal Far West as a place of respite and security. As the primary heritage significance of the place is vested in its State-significant long term operation as a charitable institution, the proposal is considered acceptable and appropriate from a heritage perspective as it safeguards these operations allowing them to continue into the future and adapt as required to meet the evolving demands of this important institution.
- The rear wings of Drummond House will be demolished as part of this development for a number of reasons; they are not fit for purpose to support the significant charitable use of the place; they have been highly modified and provide a confused internal configuration; the subject site is being excavated to provide for underground parking and demolition of the rear wings is required to facilitate this use; and the existing outdoor play areas are insufficient to support the special needs of the children and families being supported by Royal Far West and the rear wings of Drummond House are an ideal location to provide a safe and secure outdoor environment for clients. This demolition removes fabric of secondary importance compared with the front principal wing form, which is generally the only area of the building to still demonstrate the Inter-War Classical style of the place (albeit, also highly modified). The rear wings of Drummond House, proposed for removal, are not required to be retained in order to understand and appreciate the identified heritage significance of the place, being its State-significant function as a charitable institution and its representative value as an Inter-War Classical style, evidenced primarily in the principal elevation. The revised CMP grades this rear wing fabric as having 'Moderate Significance' only, and as such the removal of this fabric will not affect any fabric of Exceptional or High heritage significance.
- The proposal including the new rear additions to Drummond House, the internal adaptive reuse of Drummond House and the new buildings on the site have been designed by two of Australia's preeminent architects, Glenn Murcutt and Angelo Candalepas, and represents a high degree of design excellence. The proposal is finely detailed and carefully considers the heritage context within which the new buildings sit, and having regard for the calibre of the architects involved in this important charitable institution proposal, the proposal has been carefully considered and represents an important addition to the streetscape and the architectural layering of Manly. We also consider that the new work, of design excellence, is very likely to be recognised as an important historic layer in the future.
- The proposed extensions, additions and new buildings are wholly contemporary in their design and materiality, however have been designed to respond to the character of the precinct and the adjoining heritage items. The buildings will incorporate contemporary materials such as concrete and brass or bronze cladding which respond to the masonry materiality of the immediate heritage items including Drummond House and the Victorian building on South Steyne to the south of the site. The new buildings

and additions will not replicate traditional or significant detailing or design, retaining a sense of hierarchy across the site and along the streetscape which provides an understanding of the various periods of development.

- The proposed new rear additions to Drummond House have adopted a rhythmic wing form that interprets the wing form of the fabric proposed for demolition. This approach allows for an understanding of and sympathetic response to the original design and form of the building while still being able to facilitate the proposal and retaining the highly significant front portions of Drummond House.
- No changes to the existing curtilages or physical lot boundaries of adjoining heritage items are proposed. While the visual setting of the immediately adjoining heritage items will change as a result of the proposal, this does not equate to an adverse impact on the significance of these items. As the proposal effectively provides for the replacement of existing buildings with new upgraded facilities for Royal Far West, there will be negligible changes to views towards and from vicinity heritage items. The vicinity heritage items will continue to be appreciated within their existing setting and will be readily interpretable.
- Along Wentworth Street, the proposal site adjoins the Former School of Arts at 12 Wentworth Street (Item 244). However, it is noted that a new building has been constructed at 18 Wentworth Street as part of the previous approval for the subject site and provides a visual and physical barrier between the heritage item and Drummond House. The new development on South Steyne adjoining the heritage item (Item 226), a Victorian house at 15–16 South Steyne, effectively replaces an existing late twentieth century concrete building with a new development with a more consistent streetscape response. This new building is setback from the Victorian heritage item to provide appropriate distancing. There is no marked change in terms of heritage impact on the Victorian item between the existing building to the new building, apart from an improved streetscape response in design and amenity. The buildings are of a similar scale and the new building provides a larger setback from the heritage item, and is therefore considered to provide an overall improved heritage outcome.
- The subject site is also located in the vicinity of the C2 Town Centre Conservation Area which is significant for its ability to demonstrate the development of the beach-side town centre. The proposal will not impact adversely on any of the heritage values associated with this conservation area.

Overall the proposal is considered to have an acceptable impact and is strongly recommended for approval from a heritage perspective. The design has evolved in response to Council's preliminary feedback to address and manage potential concerns and the proposed scheme is now well resolved and represent a strong collaboration by two of Australia's leading architects.

The potential heritage impacts of the removal of the rear wing fabric of Drummond House and development of new buildings in the immediate vicinity are substantially outweighed by the obvious longer-term benefits of this transformational project to the operations of Royal Far West and the protection and reinforcement of the State-significant heritage values of this place as a long running charitable institution.

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[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]

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