

**URBIS**

# **CONSERVATION MANAGEMENT PLAN**

Drummond House, 22 Wentworth Street,  
Manly NSW 2095

Prepared for  
**ROYAL FAR WEST**  
20 November 2020

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# CONTENTS

<b>Executive Summary</b> .....	<b>1</b>
Background & Purpose of this Conservation Management Plan .....	1
Why is the Place Significant? .....	1
How should the Significance of the Place be Managed? .....	1
<b>1. Introduction</b> .....	<b>3</b>
1.1. Background.....	3
1.2. Site Location .....	3
1.3. Methodology .....	4
1.4. Author Identification and Acknowledgements.....	4
1.5. Limitations.....	4
<b>2. Site Description</b> .....	<b>5</b>
2.1. Site Context .....	5
2.2. Drummond House.....	6
<b>3. History</b> .....	<b>9</b>
3.1. Manly History .....	9
3.2. Royal Far West Site Early History: 1810-1923 .....	9
3.3. Stanley and Lucy Drummond .....	14
3.4. Far West Children’s Home and Scheme: 1924-2011 .....	15
3.5. Drummond House History .....	24
<b>4. Archaeological Overview</b> .....	<b>28</b>
4.1. Aboriginal Archaeology .....	28
4.1.1. Introduction.....	28
4.1.3.1. Mary Dallas Consulting Archaeologists, 2011. <i>Royal Far West, Manly Beach NSW. Cultural Heritage Assessment and Aboriginal Archaeological Assessment</i> .....	28
4.1.4. Aboriginal Heritage Information Management System.....	31
4.1.5. Geology and Soils .....	36
4.1.6. Vegetation and Resources .....	36
4.1.7. Hydrology .....	36
4.1.8. Landform .....	36
4.2. Historical Archaeology .....	38
4.2.1. Archaeological Potential .....	38
<b>5. Comparative Analysis</b> .....	<b>40</b>
5.1. Overview of Architect.....	40
5.2. Comparison Table.....	40
<b>6. Heritage Significance</b> .....	<b>44</b>
6.1. What is Heritage Significance? .....	44
6.2. Significance Assessment.....	44
6.3. Established Statement of Significance – Drummond House.....	48
6.4. Levels and Grading of Significance .....	49
6.5. Schedule of Significant Elements .....	50
<b>7. Heritage Listings &amp; Statutory Obligations</b> .....	<b>52</b>
7.1. Heritage Listings .....	52
7.2. Statutory Obligations.....	55
7.2.1. Commonwealth Legislation and Policies.....	55
7.2.1.1. Environmental Protection and Biodiversity Conservation Act 1999 .....	55
7.2.1.2. Building Code of Australia 1996/ National Construction Code 2011.....	55
7.2.2. NSW Legislation and Policies .....	57
7.2.2.1. Environmental Planning and Assessment Act 1979 .....	57
7.2.2.2. Heritage Act 1977 .....	57
7.2.2.3. National Parks and Wildlife Act 1974 .....	58

7.2.2.4.	State Environmental Planning Policies.....	58
7.2.3.	Local Government Policies.....	60
7.2.3.1.	Manly Local Environmental Plan 2013.....	60
7.2.3.2.	Manly Development Control Plan 2013.....	62
7.3.	Management Plans and Guidelines.....	63
<b>8.</b>	<b>Opportunities and Constraints .....</b>	<b>64</b>
8.1.	Introduction .....	64
8.2.	Statutory and Non-Statutory Requirements.....	64
8.3.	The Burra Charter .....	64
8.4.	Management of Heritage Significance.....	66
8.5.	Condition and Integrity of Fabric and Physical Evidence .....	66
8.6.	Owner's Requirements .....	67
8.7.	Current and Future Uses .....	68
<b>9.</b>	<b>Conservation Policies.....</b>	<b>69</b>
9.1.	What is a Conservation Policy? .....	69
9.2.	Definitions .....	69
9.3.	Adoption and Review .....	71
9.4.	Management of Heritage Significance.....	71
9.5.	Conservation and Maintenance .....	73
9.6.	Use.....	74
9.7.	Managing Change: Alterations, Adaptation and New Works.....	75
9.7.1.	Managing Change: Basis of Approach.....	75
9.7.2.	Exterior Elements and Fabric .....	75
9.7.3.	Interior Elements and Spaces .....	76
9.8.	Archaeology .....	78
9.8.1.	Aboriginal Archaeology.....	78
9.8.2.	Historical Archaeology.....	78
9.9.	Curtilage, Setting and Views.....	79
9.10.	Interpretation.....	79
9.11.	Implementation Strategies .....	79
<b>10.</b>	<b>Bibliography and References .....</b>	<b>80</b>
10.1.	Bibliography .....	80
10.2.	References.....	81
<b>11.</b>	<b>Disclaimer .....</b>	<b>82</b>

## FIGURES

Figure 1 – Location of the Site.....	3
Figure 2 – Aerial photograph showing Royal Far West outlined in red with Drummond House (subject site) in blue .....	4
Figure 3 – Site Context.....	5
Figure 4 – Drummond House, Wentworth St elevation .....	6
Figure 5 – Drummond House, external and internal spaces .....	7
Figure 6 – Portion of East Brighton Estate (c. 1877) and Bassett-Darley Estate (c. 1894) .....	10
Figure 7 – Sandhurst, late 19th century .....	10
Figure 8 – Plan of site, 1889.....	11
Figure 9 – Paris Gardens in backdrop to Manly Beach, 1921 .....	12
Figure 10 – Big Wheel Grounds, 1927 .....	13
Figure 11 – Stanley Drummond with his brother and wife.....	14
Figure 12 – Depot Building (now demolished), Wentworth St.....	15
Figure 13 – Plan of site, 1935.....	16

Figure 14 – South Steyne opposite Luna Park, 1937.....	17
Figure 15 – Aerial of site, 1943.....	17
Figure 16 – Old Nurse’ Quarters in Wentworth Street, c. 1960.....	19
Figure 17 – Elsie Hill Administration and Staff Quarters, c. 1962 .....	20
Figure 18 – Drummond House and Elsie Hill building on Wentworth St, c. 1962 .....	20
Figure 19 – Construction of the Moncrieff Barron Wing, 1964 .....	21
Figure 20 – Far West site, corner South Steyne and Wentworth Street, c.1966 .....	21
Figure 21 – Far West Buildings Complex at Manly, 1975 .....	22
Figure 22 – Aerial photograph of site in Manly, c. 1982 .....	23
Figure 23 – Drummond House, 1934 .....	25
Figure 24 – Drummond House, 1946 .....	25
Figure 25 – Drummond House, 1986 and 1999 .....	26
Figure 26 – Historical Aerial Photographs of the Subject Site.....	27
Figure 27 – 2011 Royal Far West Scheme subject area with areas of Aboriginal archaeological sensitivity .....	30
Figure 28 – Graph showing the results of AHIMS Search for Client Service ID: 537914 .....	33
Figure 29 – Registered AHIMS sites .....	34
Figure 30 – Registered AHIMS sites within the vicinity of the subject area .....	35
Figure 31 – Soil Landscapes and Hydrology.....	37
Figure 32 – Sandhurst, late 19 <sup>th</sup> century .....	39
Figure 33 – Extract of Heritage Map.....	53
Figure 34 – The Burra Charter Process (flow chart showing the steps in planning for and managing a place of cultural significance, with Key articles relevant to each step shown in the boxes).....	65

## TABLES

Table 1 – AHIMS search results (Client Service ID: 537914) .....	32
Table 2 Comparative Analysis Table – Morrow & De Putron/Gordon .....	40
Table 3 – Assessment of Heritage Significance .....	44
Table 4 – Gradings of significance definitions .....	49
Table 5 – Gradings of condition definitions .....	49
Table 6 Gradings of Significant Elements .....	50
Table 7 – Heritage Listings .....	52
Table 8 Vicinity Heritage Items .....	54
Table 9 – Definitions of terms .....	69
Table 10 – Implementation Strategies for Conservation Policies.....	79

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# EXECUTIVE SUMMARY

## Background & Purpose of this Conservation Management Plan

Urbis was engaged by Royal Far West to prepare the following Conservation Management Plan (CMP) for Drummond House, which forms part of the larger Royal Far West holdings in Manly. The CMP provides a considered analysis of the heritage significance of the place and provides policies and guidance to assist owners and users to appropriately manage this significance into the future.

Drummond House is owned and occupied by Royal Far West, a non-profit charitable organisation which has been operating from the site for over 95 years. Royal Far West provides services to enhance the health and wellbeing of children who normally reside in country and regional areas. The services include the provision of clinical, educational, and accommodation services for the treatment of their clients and the safety and security of these children in need and their families.

## Why is the Place Significant?

Drummond House is listed as an individual heritage item (Item 245) under Schedule 5 of the Manly Local Environmental Plan 2013, described as Described as *The Drummond Far West Home, 22 Wentworth Street*.

The established statement of significance for Drummond House is outlined below:

*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.<sup>1</sup>*

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.

## How should the Significance of the Place be Managed?

Section 6.5 of this CMP outlines the individual elements across the site and their relative grading of significance. Section 7 of this CMP outlines the obligations relating to the management of the place given its identified heritage significance.

Section 8 of this CMP outlines opportunities and constraints in relation to the future use and development of the place with regard for its identified heritage significance.

Section 9 of this CMP provides conservation policies which must be adopted to guide the ongoing conservation of the place and its significant elements. Policies provide guidance for change to individual elements, statutory obligations and maintenance and repair.

This CMP should be adopted by all owners, users and tenants of the place to guide and protect the heritage significance of Drummond House.

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<sup>1</sup> Heritage NSW, State Heritage Inventory, The Drummond Far West Home, <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020103>

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# 1. INTRODUCTION

## 1.1. BACKGROUND

Urbis was engaged by Royal Far West to prepare the following Conservation Management Plan (CMP) for Drummond House, which forms part of the larger Royal Far West holdings in Manly. The CMP provides a considered analysis of the heritage significance of the place and provides policies and guidance to assist owners and users to appropriately manage this significance into the future.

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## 1.2. SITE LOCATION

The subject site is located in Manly and fronts Wentworth Street to the north (Figure 1). The subject area for this CMP is limited to Drummond House only and is legally described as Part (the eastern half) of Lot 101 DP1247422 (Drummond House).

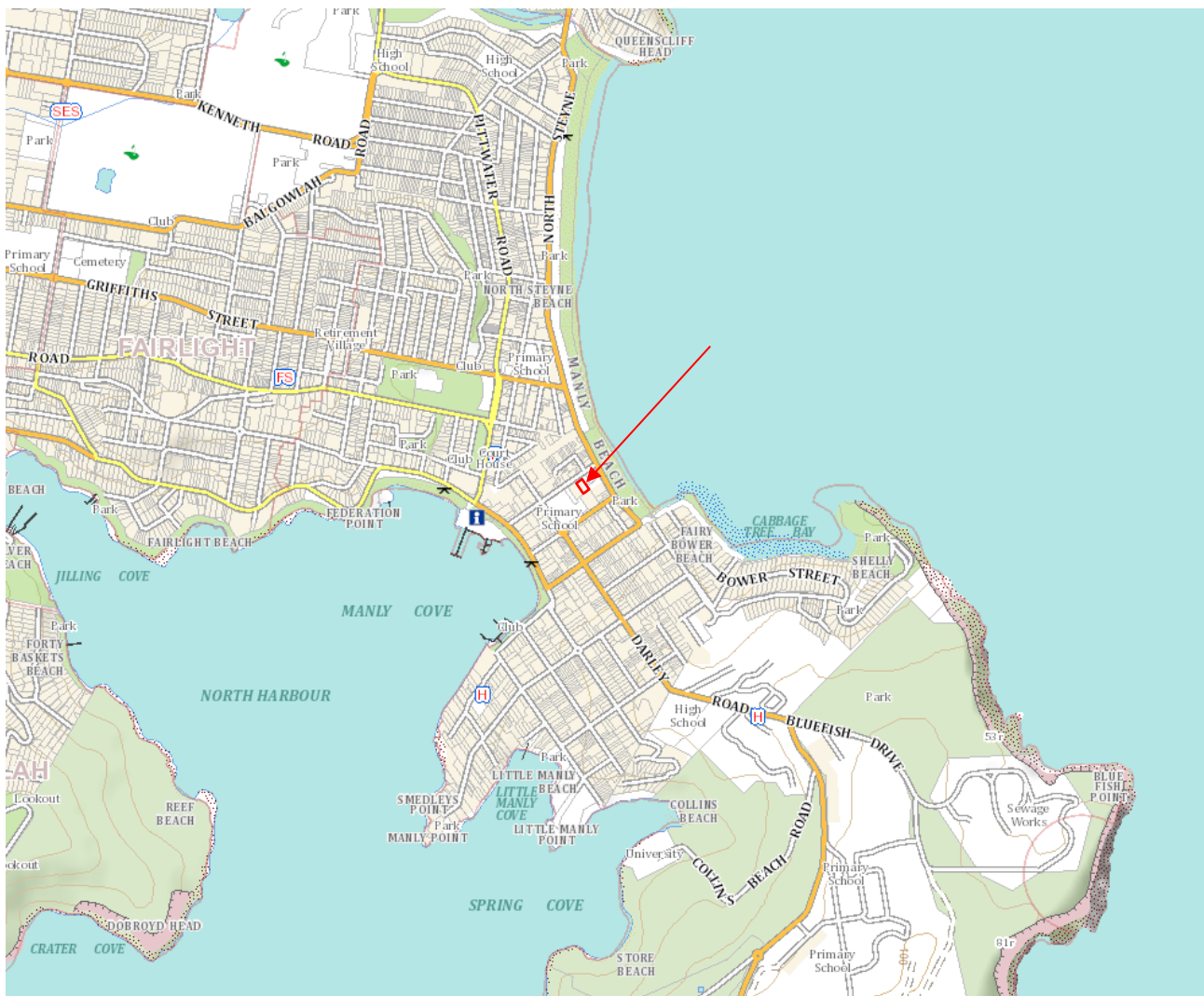


Figure 1 – Location of the Site

Source: Google Maps 2020



Figure 2 – Aerial photograph showing Royal Far West outlined in red with Drummond House (subject site) in blue

Source: Google Maps 2020

### **1.3. METHODOLOGY**

This CMP has been prepared in accordance with the NSW Heritage Manual (1996 and updated publications), and the philosophy and process adopted is guided by the Australia ICOMOS Burra Charter (1999) and The Conservation Plan by James Semple Kerr (2000).

This CMP supersedes the Conservation Management Strategy (CMS) produced by Urbis for Royal Far West in 2011. As this document is a CMP and not a CMS, we have undertaken a more thorough investigation and analysis of the significance, opportunities and constraints of the site. As a result and given the length of time which has passed since the CMS was prepared, some of the recommended management strategies for Drummond House have changed. This is also due to the evolving needs of the Royal Far West charity.

This report also references the 'Cultural Heritage Assessment and Aboriginal Archaeological Assessment' prepared by Mary Dallas Consulting Archaeologists (2011), which provides an overview of Aboriginal archaeological sites and Aboriginal historical association of the Manly area in general and the Royal Far West Health Scheme, to aid in an overview of the Aboriginal cultural heritage significance of the RFW site.

Urbis has prepared a high level overview of the historical archaeological potential of the place. This high level analysis does not constitute a Historical Archaeological Assessment, which may be required to be prepared prior to any subsurface disturbance works to the place.

### **1.4. AUTHOR IDENTIFICATION AND ACKNOWLEDGEMENTS**

This report has been prepared by Ashleigh Persian (Senior Heritage Consultant) and reviewed by Jonathan Bryant (Director Heritage). Archaeological input has been prepared by Andrew Crisp (Senior Archaeologist) and Aaron Olsen (Archaeology Consultant).

Unless otherwise stated, all photographs and content are the products of Urbis.

### **1.5. LIMITATIONS**

Having regard for the sensitive use of Drummond House and lack of available access together with the 2020 COVID-19 climate, internal access to Drummond House was not available for this updated 2020 CMP. Internal photographs have been supplied by Royal Far West to ascertain the internal condition of fabric and these photographs, together with Urbis's previous photographic record, have been relied upon for the discussion and analysis of internal spaces.



## 2. SITE DESCRIPTION

### 2.1. SITE CONTEXT

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. The subject area is legally described as Part Lot 101 DP1247422 (Drummond House). The site has access from Wentworth Street and is located on a generally regular lot of level land.

To the east across South Steyne is Manly beach. A large development fronts the northern side of Wentworth Street to the corner of South Steyne. Manly Public School is directly west of the site, which was used by Far West as schooling facilities throughout the Scheme's history.

Figure 3 – Site Context



Wentworth Streetscape, looking west (Norfolk Island pines, Port Jackson fig and Brush Box are heritage items)



Wentworth Streetscape, looking east



South Steyne, looking north



Beach Reserve (Promenade), South Steyne and Public Shelter (both heritage items)



Victoria Parade Streetscape, looking west (Norfolk Island pines are heritage item)



Newstead Flats, Victoria Parade

## 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.

It is located on the eastern half of Lot 101 DP1247422 with the street address of 22 Wentworth Street. This lot was recently amalgamated with the adjoining Royal Far West land holdings.

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



Figure 4 – Drummond House, Wentworth St elevation



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 10 years ago to meet BCA requirements.

Figure 5 – 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

## 3. HISTORY

This Section provides an overview of Manly's history and development, early development and uses of the site before Far West, the life of the Drummonds, the establishment of the Far West Health Scheme and more detailed history for Drummond House.

### 3.1. MANLY HISTORY

From the early days of European settlement in Sydney the area of Manly was named by Captain Arthur Phillip following his first encounter with the local aborigines in January 1788. He observed the "confident and manly behaviour" of the Aborigines. The area was also referred to as "down the harbour" or "North Arm" before "Manly" became popular.<sup>2</sup>

Manly Council was incorporated as a local government in January 1877. Manly's early development was slow but by 1880 it had become a thriving seaside resort.

House numbers were introduced by Manly Council for most streets in inner Manly in 1909.

The Manly Heritage Study (1986) identified three important components of European history for the municipality:

- Establishment of the area as a resort, with planning designed to provide access to the beach and harbour, with the formality of the streets, parks and street plantings, and the architecture reflecting the two boom periods (c1880-90 and c1910-40);
- Isolation of the place up until the construction of the Spit Bridge in 1924, and the resulting stylistic variations in architectural ornament; and
- The physical environment, including the relationship of the harbour and coast, the visibility of the landform and the ornamental plantings.

Twentieth century Manly has been characterised by large scale demolition of 19<sup>th</sup> century buildings for flats and bungalows, a continuing tourism focus, and until recent decades it has retained a uniformity of scale.

### 3.2. 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.

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<sup>2</sup> Manly Council 2011



Figure 6 – 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.<sup>3</sup>

Figure 7 – Sandhurst, late 19th century



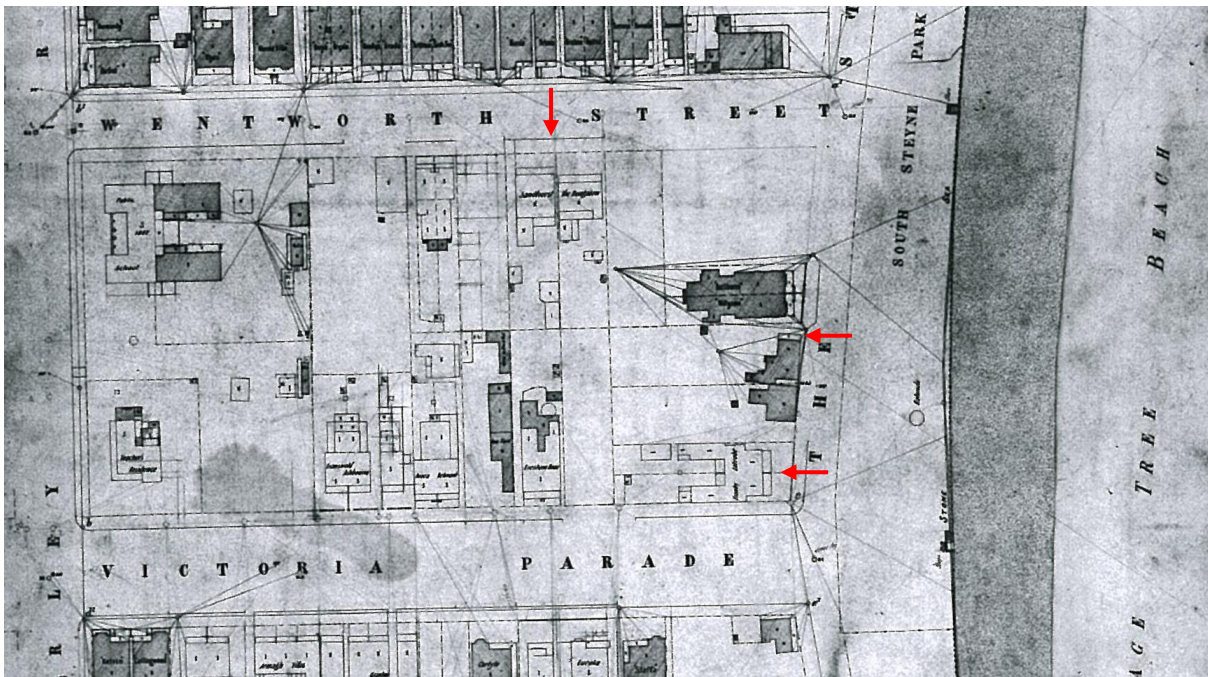
Source: Manly Studies Local Studies Library, MAN09172 Sandhurst, Wentworth Street. MWPMS image

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).

<sup>3</sup> *Sands Directory*



Figure 8 – 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 Directory 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*.<sup>4</sup>

*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.<sup>5</sup>

<sup>4</sup> Sands Directory

<sup>5</sup> Metherell 2006, Chapter 5

Figure 9 – 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.<sup>6</sup>

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.

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, RJ 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.

<sup>6</sup> *Sands Directory*



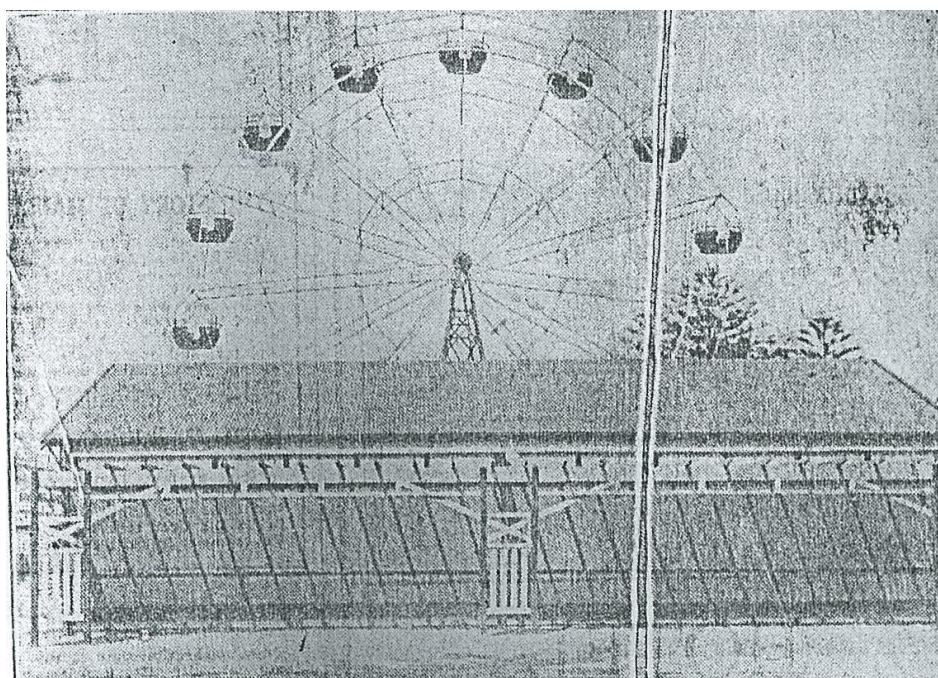
In 1922 the Paris Gardens on the corner of South Steyne and Wentworth Street became the Palais de Danse and from 1923 until 1925 as The Follies, after the 'Folies Bergere', at the notorious Moulin Rouge in Paris. In 1925-26, racing to keep up with the next big thing, it became The Palais.<sup>7</sup>

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.<sup>8</sup>

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.

Figure 10 – 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.<sup>9</sup>

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.

<sup>7</sup> Metherell 2006, Chapter 5

<sup>8</sup> Metherell 2006, Chapter 3

<sup>9</sup> Manly Local Studies Library 2011; Metherell 2006, Chapters 5 and 6

### 3.3. 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 led him to become a carpenter's assistant.<sup>10</sup>

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.<sup>11</sup>

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.<sup>12</sup>

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

Figure 11 – 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]

<sup>10</sup> Royal Far West Children's Health Scheme 1984:4

<sup>11</sup> Killeen 1995:3-6

<sup>12</sup> Mitchell 2011

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

The Far West Children's Health Scheme<sup>13</sup> 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 1<sup>st</sup> Annual Summer Camp for children from the remote far west of NSW, held in Cronulla in December 1924. It was successful enough for a 2<sup>nd</sup> camp, which was at Collaroy in January 1925.<sup>14</sup>

In January 1926 a 3<sup>rd</sup> 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.

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).<sup>15</sup>

Figure 12 – 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.

<sup>13</sup> The Scheme was officially given the title of 'Royal' in recognition of its long service to country children in 1970.

<sup>14</sup> Bavinton 2011, Far West Timeline

<sup>15</sup> Bavinton 2011, Far West Timeline



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.<sup>16</sup>

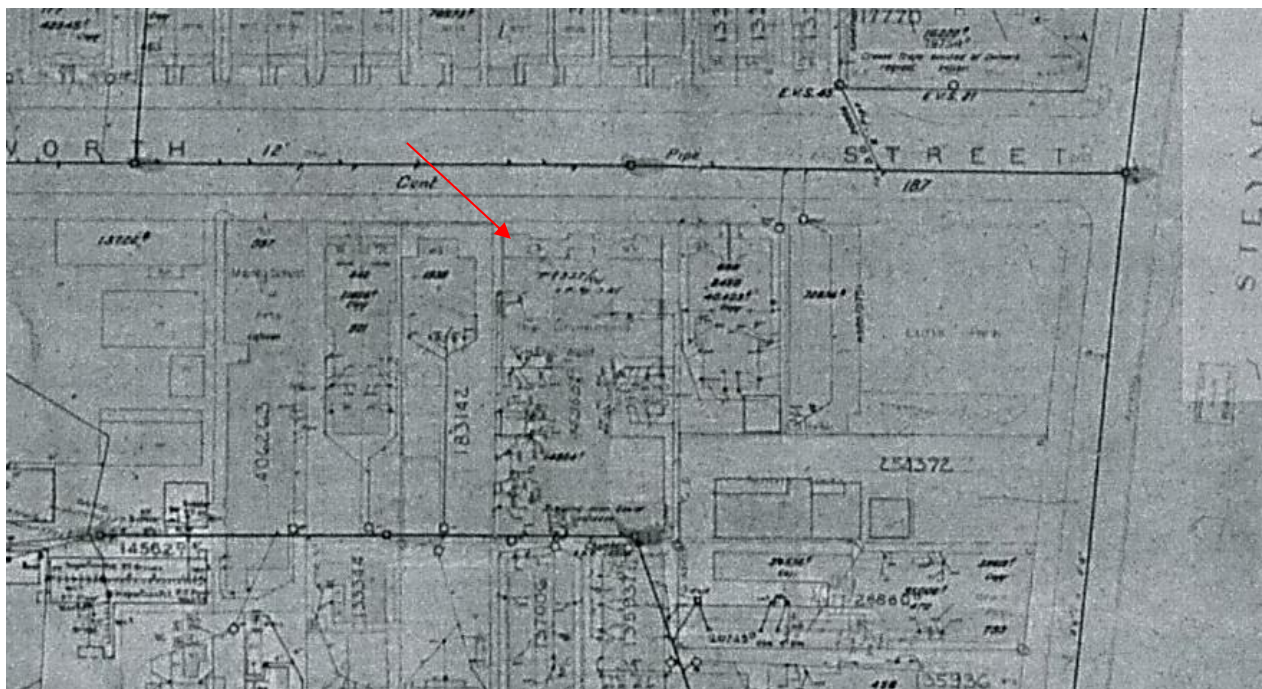
The schooling facilities at the site are conducted by the Education Department solely for Far West patients. This enabled country children to keep up their studies even while in bed and undergoing long periods of treatment.

Stanley and Lucy Drummond spent much of their time “touring the Inland, constantly finding ill and crippled children”.<sup>17</sup> 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 House<sup>18</sup>, 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.<sup>19</sup>

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

Figure 13 – 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.

<sup>16</sup> Wearn 1966:19; Bavinton 2011, Far West Timeline

<sup>17</sup> Wearn 1966:20

<sup>18</sup> A detailed history of Drummond House is provided in the next Section of this Report

<sup>19</sup> Wearn 1966:37

Figure 14 – 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.<sup>20</sup>

Figure 15 – Aerial of site, 1943



Source: SIX Maps 2020

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<sup>20</sup> Wearn 1966:204

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 old nurses' block adjoining the home, the nurses' home becoming a Far West Home annexe.<sup>21</sup>

Facilities at the Manly site included a splint room, eye clinic, ideal nursery and school for patients.

In 1953 a two year legal negotiation to acquire vacant possession of a cottage, next door to Drummond House, was completed. This became the 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' contained 27 bedrooms, 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.<sup>22</sup>

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.<sup>23</sup>

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 windows and a special alcove for storage. Following the renovations, Drummond House was officially reopened in May 1954 by the Hon. J.B. Renshaw.<sup>24</sup>

The Wentworth Flats at No. 18-20 Wentworth (built in 1919) were used as staff quarters at this time. A new garage was 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 1953 to make it 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. Louvres 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 was used for table tennis by the nurses and for relaxing.

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 a library.<sup>25</sup> 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.<sup>26</sup>

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

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<sup>21</sup> The Far West Children's Health Scheme 1950:5,8

<sup>22</sup> The Far West Children's Health Scheme 1953:4

<sup>23</sup> The Far West Children's Health Scheme 1953:17

<sup>24</sup> Bavinton 2011, Far West Timeline

<sup>25</sup> Wearn 1966:240

<sup>26</sup> Royal Far West 2011; Bavinton 2011, Far West Timeline



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.<sup>27</sup>

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 catered for the sick and handicapped children who were patients at the Home. The wing had 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 after the office and nursing staff moved into their new quarters the nurses' old quarters were razed to the ground.

Figure 16 – 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.<sup>28</sup>

<sup>27</sup> Wearn 1966:244

<sup>28</sup> The Far West Children's Health Scheme 1962:8

Figure 17 – Elsie Hill Administration and Staff Quarters, c. 1962



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

The Elsie Hill Administration and Staff Quarters were officially opened in September 1962 by the NSW Governor, Lt-General Sir Eric Woodward (Figure 28).<sup>29</sup> 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 18 – 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.<sup>30</sup>

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.<sup>31</sup> It was to be used as a speech therapy clinic.

<sup>29</sup> Wearn 1966:251

<sup>30</sup> *The Far West Children's Health Scheme 1962:6*

<sup>31</sup> *Manly Daily* 20 February 1964

Figure 19 – 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 20 – 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.<sup>32</sup>

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.

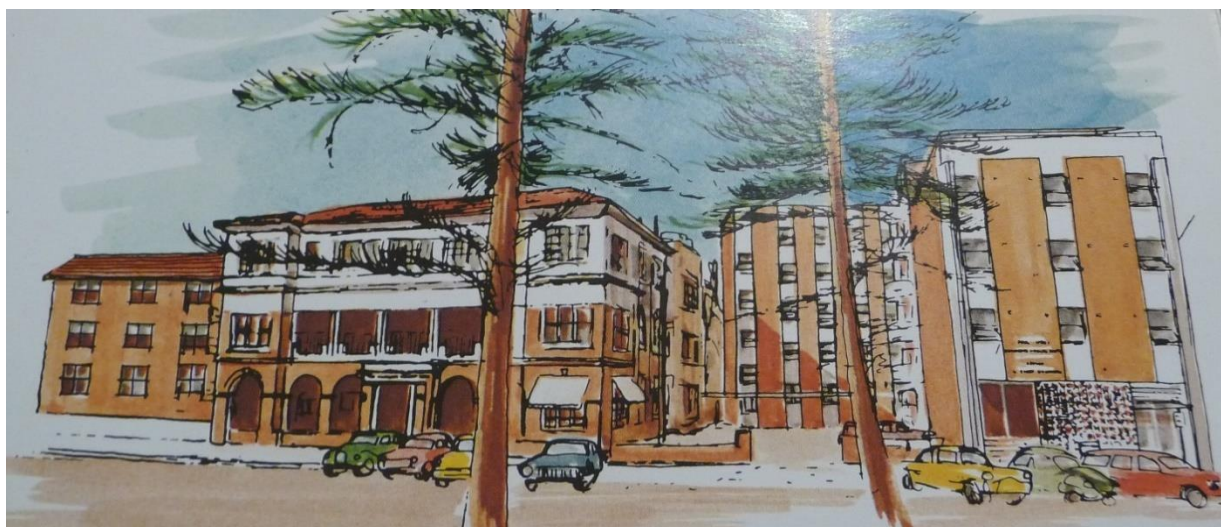
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<sup>32</sup> Royal Far West 2011; Bavinton 2011, Far West Timeline



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.<sup>33</sup>

Figure 21 – 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.<sup>34</sup>

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.<sup>35</sup> 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.

<sup>33</sup> *The Far West Children's Health Scheme 1975:1*

<sup>34</sup> *The Far West Children's Health Scheme 1975:6*

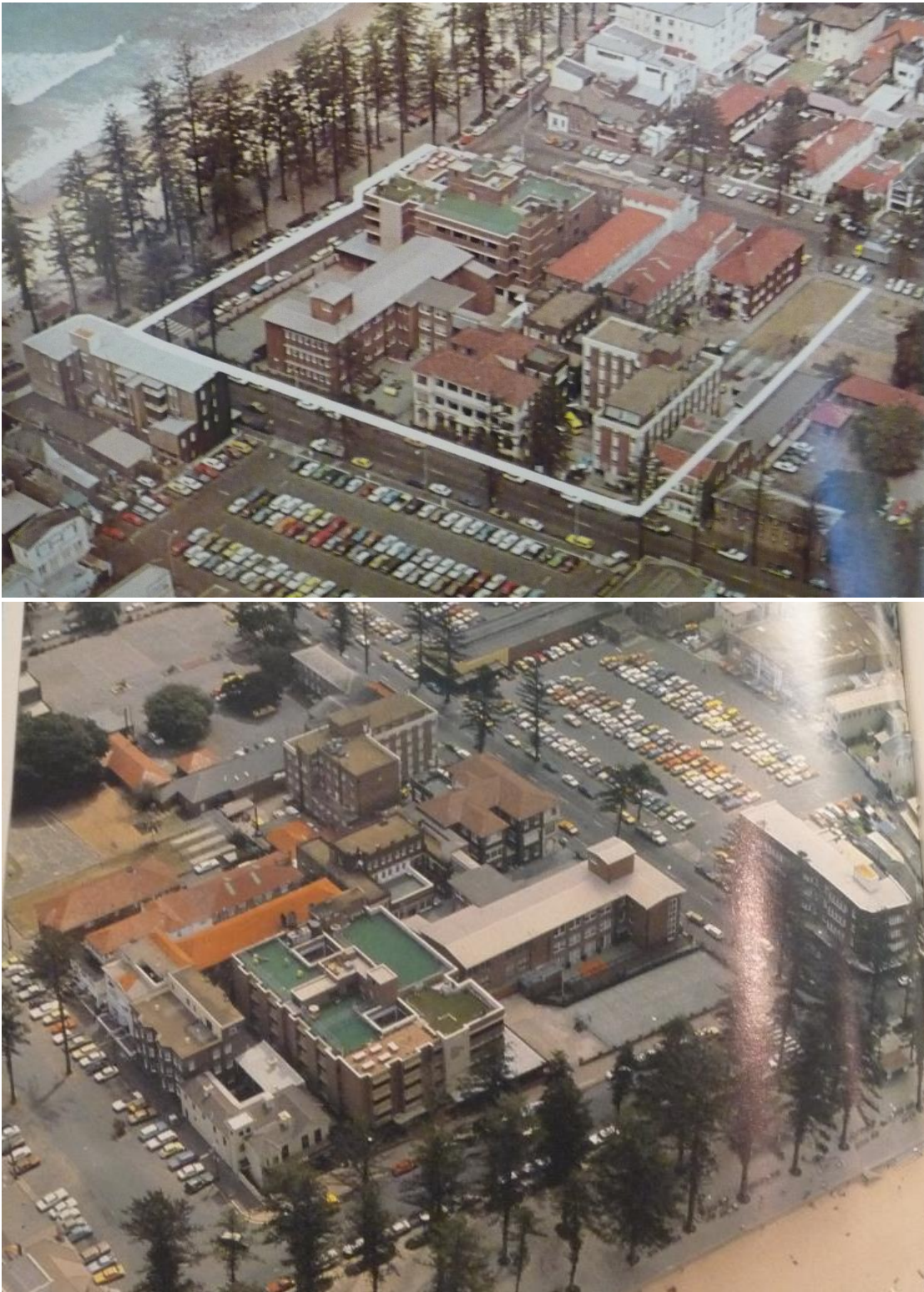
<sup>35</sup> Bavinton 2011, *Far West Timeline*



The Scheme's 1981-82 Annual Report noted that several buildings had been referred to the Scheme for use, but they were not always in good condition. This had 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 22 – 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 meant that the Scheme was reclassified 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.<sup>36</sup>

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. 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.<sup>37</sup>

By 2006 it has been decided that the high care nursing homes were 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.<sup>38</sup>

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.

### **3.5. DRUMMOND HOUSE HISTORY**

Following the establishment of the Far West Children's Scheme in 1924, various buildings were used in Manly by the Scheme prior to their first purpose-built building in 1935, Drummond House. Until 1935, children were housed by volunteers in their private dwellings, such as Gordon Winn and Elsie Hill, children were treated at the hospital owned by Dr. Moncrieff Barron, and the Scheme's first headquarters was purchased in 1929, 'The Depot'.

His Excellency Sir Phillip Game showed a keen interest in the work of the Scheme, and through discussions with Mr Drummond in 1932, a building fund was established to purchase land and erect a house to accommodate the children. Following a government grant of £3,000 and other donations in the early 1930s, David Thomas Morrow of D. T Morrow and Gordon offered his services as Honorary Architect to design the new building.

The foundation stone of Drummond House was laid by Premier Hon. B.S.B. Stevens in October 1934.<sup>39</sup> Construction of the two-storey building was monitored by James Aubrey Kerr, following the resignation of Morrow in 1932.<sup>40</sup>

Drummond House was officially opened in 1935 by His Excellency the Governor of NSW, Sir Alexander Hore-Ruthven and Lady Hore-Ruthven to a crowd of 5,000 people. The building was named after the Reverend Stanley Drummond who founded the Royal Far West Children's Health Scheme in 1924.

A third storey was added to Drummond House in 1945, which gave space for additional staff and better accommodation with more equipment.<sup>41</sup>

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<sup>36</sup> The Far West Children's Health Scheme 1989:3,13

<sup>37</sup> The Far West Children's Health Scheme 1998:14

<sup>38</sup> Royal Far West 2011

<sup>39</sup> Wearn 1966:39

<sup>40</sup> *Sydney Morning Herald* 20 March 1918

<sup>41</sup> The Far West Children's Health Scheme 1962:5



Figure 23 – Drummond House, 1934



Source: State Library of NSW, Image No. Home and Away – 4924 by Sam Hood

During World War II, Drummond House housed units of the Australian Women's Army.<sup>42</sup> Figure 24 shows Drummond House in August 1946.

Figure 24 – Drummond House, 1946



Drummond House, Wentworth Street; [Source: State Library of NSW, Government Printing Office 1 – 41892]



Nursery in Drummond House; [Source: State Library of NSW, Government Printing Office 1 – 41895]

In April 1953 Drummond Home was refurbished for the dental surgery on the top floor. The second floor was used as a recreational space for patients in isolation.

In 1960 a rear addition was added to Drummond House and a narrow walkway link on the second floor to connect to the rear addition of the School building to its east.

The second floor of Drummond House was renovated at the start of 1966 and completed in mid 1967. The new area provided more space for physiotherapy, occupational therapy and orthoptics services. Around the same time the Far West Council erected a Sun Playroom on the roof of the existing main dining room, which developed to encompass dining room facilities. The area was referred to as “the flats” and was a self

<sup>42</sup> *Manly Daily* 31 July 2009

contained unit. The dining room was used as a library reading room for children. The day room servery was also remodelled.

A survey of Drummond House in 1973 showed that the building did not meet requirements of the Fire Commissioners and would require upgrading. The rear wing was altered in 1976-78 providing a link to the George Moncrieff Barron Memorial Wing. The exterior brickwork on the main elevation of Drummond House was painted in the 1970s.

In 1983 a roof-top play centre on the rear roof of Drummond House was opened by the Major of Manly, Alderman D. Hay.<sup>43</sup>

Drummond House was noted as having “*minor significance as an example of institutional architecture*” and “*moderate significance in terms of the history of social welfare in Manly*” in the Manly Heritage Study of 1985.<sup>44</sup>

Figure 25 – Drummond House, 1986 and 1999



1986, photography by Blackmore, Ashton and Co  
[Source: Heritage Branch 2011a]



1999, photograph by W McArthur  
[Source: Heritage Branch 2011a]

In 1992 renovations of Drummond House were completed with a new ‘Care-by-Parents’ unit installed, where parents could stay in the same room as their child. The conversion work was estimated at over \$700,000, which was not funded by the government but through community support. The new unit was officially opened by the NSW Premier John Fahey.<sup>45</sup>

Drummond House was refurbished in 1997 to provide an aged care hostel costing \$1.6M. It had become outdated as a children’s hospital and in more recent times had been used as a recreation facility. Drummond House Hotel opened in March 1998 for the Aged with the official opening in June. It converted the building to 40 self contained suites with bathrooms and kitchenettes designed for the aged. The entire exterior brickwork was painted in the 1990s.

Drummond House was further refurbished in 2009 and reopened by NSW Governor Professor Marie Bashir in July. The building was converted from housing 34 aged care residents to providing home-style accommodation for 100 parents and children. Spaces included ensuite and interconnecting family rooms and lounge areas.<sup>46</sup>

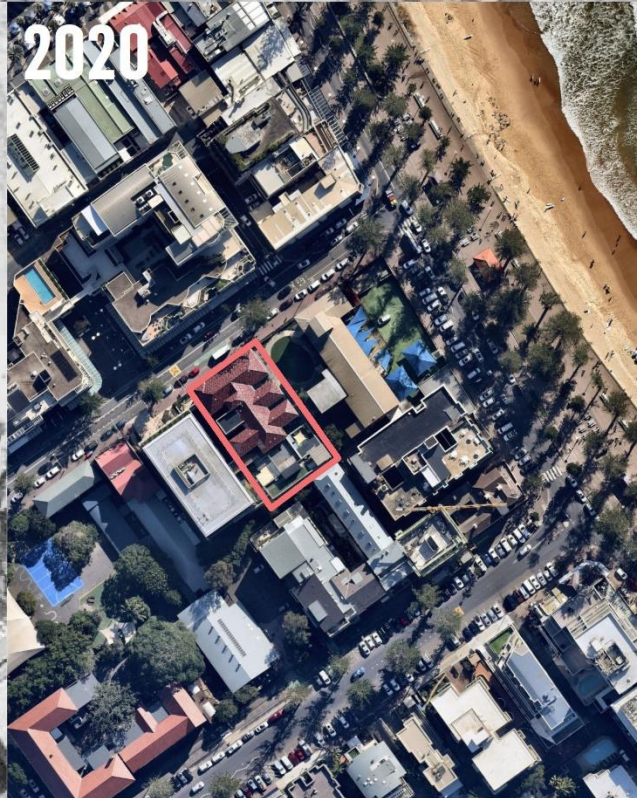
<sup>43</sup> Bavinton 2011, Far West Timeline

<sup>44</sup> Kate Blackmore and associated Consultants 1986 Vol 4., Inventory Form No. 9109-1

<sup>45</sup> The Far West Children’s Health Scheme 1991:3; Bavinton 2011, Far West Timeline

<sup>46</sup> *Manly Daily* 31 July 2009





GDA 1994 MGA Zone 56



Project No: P0019382  
 Project Manager: Andrew Crisp  
 ■ Subject Area

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**HISTORICAL AERIAL PHOTOGRAPHS**  
 Royal Far West Manly  
 Prepared on behalf of Royal Far West

Figure 26 – Historical Aerial Photographs of the Subject Site

## 4. ARCHAEOLOGICAL OVERVIEW

### 4.1. ABORIGINAL ARCHAEOLOGY

#### 4.1.1. Introduction

This section outlines the following:

- Basic and extensive search of the Aboriginal Heritage Information Management System (AHIMS) to confirm the presence or absence of recorded Aboriginal objects and/or places.
- Preliminary discussion of Aboriginal cultural heritage significance and archaeological potential of the subject site based on previous assessment by Mary Dallas Consulting Archaeologists (2011).
- Analysis of the archaeological context in accordance to the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010)* (the Due Diligence Code) including the review of previously conducted Aboriginal archaeological assessment of the subject site (Dallas 2011).
- Analysis of the landscape features of the subject area in accordance to the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010)* (the Due Diligence Code) to identify potential for sub-surface Aboriginal archaeological deposits.
- Analysis of the soil landscapes of the subject site prepared in accordance to the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010)* (the Due Diligence Code) to understand the impacts of historical land use and potential for any sub-surface Aboriginal archaeological resources that may be still present.

#### 4.1.2. Regional Archaeological Context

Previous archaeological assessments across the Cumberland Plain provide important data on Aboriginal archaeological site distribution and typology. An understanding of the archaeological landscape within the subject area can be developed through this analysis.

Aboriginal occupation in the Sydney region encompasses at least 20,000 years with dates of 13,000 before present (BP) at Shaws Creek in the Blue Mountain foothills; 11,000 BP for Mangrove Creek and Loggers Shelter and c. 20,000 BP at Burrill Lake on the NSW South Coast (Attenbrow 2002).

The majority of sites in the Sydney region have been dated to within the last 3,000 to 5,000 years, with many researchers proposing that occupation intensity increased during this period. This apparent intensity of occupation may have been influenced by rising sea levels. By about 6,500 BP, seas had risen to their present levels.

Radiocarbon dating of charcoal samples from sand sheet contexts in proximity to the Cooks River have indicated occupation to the late Pleistocene (McDonald 2005). Older occupation sites along the now submerged coastline would have been flooded, with subsequent occupation concentrating and utilising resources along the current coastlines and changing ecological systems in the hinterland and the Cumberland Plain (Attenbrow 2002).

#### 4.1.3. Local Archaeological Context

The subject site has been assessed by one previous Aboriginal archaeological assessment. This is discussed below.

##### 4.1.3.1. Mary Dallas Consulting Archaeologists, 2011. *Royal Far West, Manly Beach NSW. Cultural Heritage Assessment and Aboriginal Archaeological Assessment*

The document produced by Mary Dallas Consulting Archaeologists (MDCA 2011) provides an overview of Aboriginal archaeological sites and Aboriginal historical association with the Manly area in general and the Royal Far West Health Scheme (at the time) to aid in an assessment of the Aboriginal cultural heritage significance of the Royal Far West (RFW) health facilities at Manly.

A burial site was recorded in the East Esplanade Reserve at the end of Ashburners Street. The records for this site are limited to a Sydney Morning Herald article for 28th January 1938 which indicated it was

unearthed by Council workers in the Reserve. It is not known whether the remains were forwarded to the Australian Museum, although this is likely to have occurred.

On the basis of the topography and the underlying Quaternary sands of the Manly isthmus and where relatively undisturbed sands might be expected, the types of Aboriginal sites that are likely to have been located here include burials and open occupation sites containing shell midden, stone artefacts and/or hearths.

Although not registered on the DECCW AHIMS database there are also three known Historical Aboriginal camp sites at Manly, one of which was on land now occupied by the Manly Public School on Wentworth Street, to the immediate west of the subject area. This camp was known as a summer camp and a stopover before travelling on to Narrabeen-Pittwater.

Concerning the Wentworth Street camp, 'An Old Hand' wrote in a short history of Manly presented in the *Sydney Morning Herald*:

*A tribe of aborigines used to camp annually in the bush about where the public school now stands, on their way to Narrabeen and Pittwater. They used to corroboree frequently, and afforded amusement to young and old near the Church of England, and incidentally near the place behind the church which was the accepted ground for settling differences by the lads.*

*One of the aborigines was called "Blucher, the singer," and for a penny or even a broken knife would make the air ring with his interpretation of a song he called "Highland Laddie;" probably nothing like it has been heard since.*

### **Aboriginal Associations with the Royal Far West Scheme**

The Royal Far West (and its antecedents) drew children to Manly from Western NSW, and conversely, RFW health providers visited communities in need of health care throughout remote NSW.

With locations such as Byrock, Bourke, Boggabilla and Brewarrina connected to the RFW from its earliest days, it is not surprising that the children who received remote care (and/or attended treatment in Sydney and camps at Manly) included considerable numbers of Aboriginal children.

It is known for example that:

- During the 1930s the Far West Children's Health Scheme saw 'approximately 50 babies, including Aboriginal children'.
- The Far West Children's Health Scheme visited and treated children at Aboriginal camps, stations and missions such as those at Moree, Yandama and Brewarrina.
- Aboriginal children were frequently involved in the Far West summer camps at Manly.
- The Far West Children's Health Scheme treated its first Aboriginal twins in 1962.
- A Scheme dentist pulled 18 teeth from one Aboriginal child at Pilliga during a visit in 1953. The teeth were part of 1506 teeth removed over 21 days.
- Betty Zooch (a 16 year old Aboriginal girl from the Parramatta Girls School) was made a 'ward of the Aborigines Welfare Board' in 1954 when she was put into the care of Far West Health Scheme treasurer Dr W. Wearne.
- Belinda (from an Aboriginal reserve at Moree) was treated in Sydney for injuries and malnutrition in 1964.

It is evident that Royal Far West would have had a significant impact on remote Aboriginal children's health and wellbeing particularly when specialist care was needed.

### **Aboriginal Archaeological Sensitivity**

The Aboriginal archaeological heritage is currently not known. Archaeological sensitivity of the subject land is related to the likelihood of Aboriginal sites [inclusive of human remains] remaining on the land given the degree of disturbance resulting from past construction activities.

### **Conclusions and Recommendations**

The study by MDCA (2011) identified three areas which appear to have sustained fewer disturbances from construction and related activities (Figure 27). However, MDCA stated there could be no definitive



determination at that stage (2011) that the subject land does not contain any Aboriginal archaeological remains. The areas defined as sensitive (Figure 27) may or may not contain Aboriginal objects and they may or may not contain Potential Archaeological Deposit [PAD]. In 2011 MDCA did not know the structure or condition of the sand deposits underlying the site. There remained a possibility for Aboriginal burials (either in situ or human remains disturbed by previous land use activities) and similarly a possibility for isolated remnants of former (now buried) land surfaces to be present in less disturbed areas of the site within which Aboriginal archaeological remains may also survive. In 2011 there was little information on the sand body across the isthmus which could have guided an archaeological examination of the sand body. MDCA stated that it is possible the sand deposits are greatly truncated and there remains little of the upper units which might contain artefact bearing deposit.



Figure 27 – 2011 Royal Far West Scheme subject area with areas of Aboriginal archaeological sensitivity

Source: MDCA 2011

MDCA (2011) determined that an archaeologist and a representative of the Metropolitan Local Aboriginal Land Council should conduct test excavation in the sensitive areas immediately following demolition in these areas and prior to demolition in neighbouring areas. The archaeological investigation would aim to identify presence or absence of Aboriginal archaeological remains as may be resident on or within former land surfaces. The timing of the investigations is logistically tied to the demolition phase of the project as access to the subsurface deposits is currently limited by buildings and concrete surfaces.

The recommended test excavation and monitoring of initial post-demolition excavation works were intended to clarify/refine the overall archaeological sensitivity of the subject land and potentially preclude the need for further test excavation or monitoring work.

MDCA recommended that Aboriginal archaeological test excavation and monitoring should be conducted in tandem with historical archaeological investigations as may be recommended.

MDCA (2011) recommended that:

1. While the work of the Royal Far West scheme is celebrated for its vision and humanitarianism, it can be especially celebrated that the scheme was non-discriminatory. Consideration should be given to commemorating the work with Aboriginal communities, mothers and children throughout its history.
2. At the commencement of any earthworks or remediation works on site the excavation workers be provided Cultural Heritage Awareness Induction by a qualified archaeologist and a representative of the Metropolitan Local Aboriginal Land Council. The induction should ensure that workers can identify cultural remains so that they can be managed appropriately.
3. An Aboriginal archaeological test excavation be conducted within the areas identified as archaeologically sensitive immediately following demolition of the court surfaces of the Far West School and the concrete slab surface of the rear car park of the Elsie Hill building and across the footprint of the Terrace should it not be retained. These areas should be investigated before neighbouring demolition to avoid contamination of sediments. The test excavations should be co-ordinated with any historical archaeological investigations as may be recommended.

#### **4.1.4. Aboriginal Heritage Information Management System**

The AHIMS database comprises previously registered Aboriginal archaeological objects and cultural heritage places in NSW and it is managed by the Department of Premier and Cabinet (DPC) under Section 90Q of the *National Parks and Wildlife Act 1974* (NPW Act). Aboriginal objects are the official terminology in AHIMS for Aboriginal archaeological sites. The terms 'Aboriginal site(s)', 'AHIMS site(s)', 'archaeological site(s)' are 'sites' used herein to refer to and describe the nature and spatial distribution of archaeological resources in relation to the subject area.

An extensive search of the AHIMS database was carried out by Urbis on the 24<sup>th</sup> September 2020 (AHIMS Client Service ID: 537914) for an area of approximately 6 km<sup>2</sup>. A summary of all previously registered Aboriginal sites within the extensive search area is provided in Table 1 and the spatial distribution of the sites is shown in Figure 29 and Figure 30.

The AHIMS search identified no Aboriginal sites or Aboriginal places within, or in close proximity to, the subject area.

The nearest registered Aboriginal sites to the subject area are AHIMS ID# 45-6-0725 (approximately 460m south of the subject area), AHIMS ID# 45-6-1153 (approximately 450 south west of the subject area) and AHIMS ID# 45-6-2239 (approximately 500m north west of the subject area). AHIMS ID# 45-6-0725 and AHIMS ID# 45-6-1153 are both rock engravings, while 45-6-2239 is a rock shelter with an associated midden.

In the broader Extensive AHIMS search area a total of 109 Aboriginal sites are registered. Three search results were identified as 'not a site'. These have been excluded from the analysis, reducing the number of sites in the extensive search area to 106 (see Table 1).

Identified sites in the extensive search area include both open context and closed context sites, consistent with the varied landforms across the search area. The most common site types identified in the search are art sites, which represent 23% (n=24) of search results, and middens, which represent 21% (n=22) of search results. The high proportion of art sites, mostly rock engravings, and middens is consistent with the abundance of sandstone outcrops and maritime resources available to Aboriginal people in the coastal region around the subject area. A relatively high proportion of closed sites, representing 31% (n=31) of all sites, is also consistent with coastal geology and general availability of rock overhangs.

It should be noted that the AHIMS register does not represent a comprehensive list of all Aboriginal objects or sites in a specified area as it lists recorded sites only identified during previous archaeological survey effort. The wider surroundings of the subject area and in general the Cumberland Plain area have been the subject of various levels and intensity of archaeological investigations during the last few decades. Most of the registered sites have been identified through targeted, pre-development surveys for infrastructure and maintenance works, with the restrictions on extent and scope of those developments.

Table 1 – AHIMS search results (Client Service ID: 537914)

Site Type	Context	Total	Percentage
Art Site	Open	24	23%
Midden	Open	22	21%
Shelter with Midden	Closed	16	15%
Shelter with Art	Closed	8	8%
Artefact Site	Open	7	7%
Shelter with Artefact/s	Closed	6	6%
Burial/s	Open	2	2%
Grinding Grooves	Open	2	2%
Habitation Structure	Open	2	2%
Habitation Structure with Earth Mound	Open	2	2%
PAD	Open	2	2%
Quarry	Open	2	2%
Restricted Site	Open	2	2%
Burial/s with Midden	Open	1	1%
Earth Mound	Open	1	1%
Grinding Grooves with Art	Open	1	1%
Midden with Artefact/s	Open	1	1%
Shelter with Art and Artefact/s	Closed	1	1%
Shelter with Art and Midden	Closed	1	1%
Shelter with Burial/s, Art and Midden	Closed	1	1%
Water Hole with Art	Open	1	1%
Water Hole with Art and PAD	Open	1	1%
<b>Total</b>		<b>106</b>	<b>100%</b>

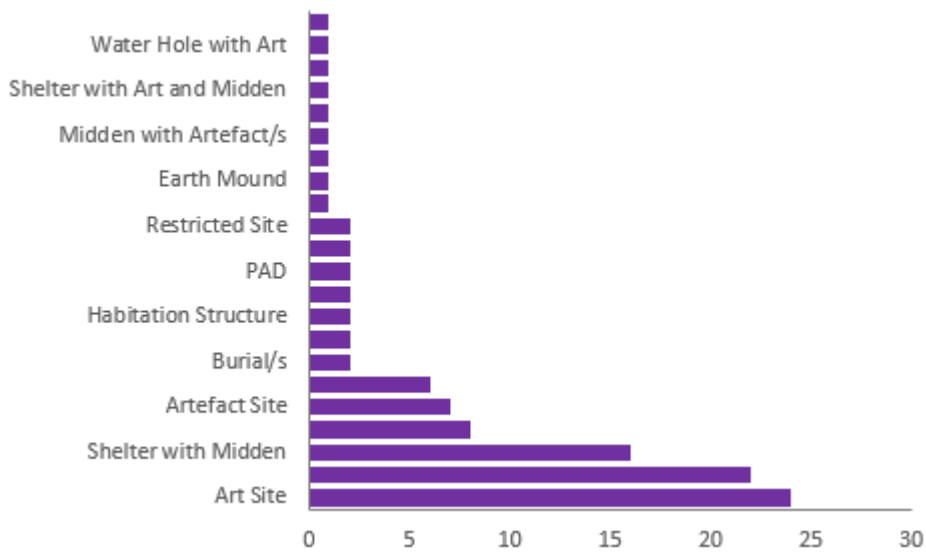


Figure 28 – Graph showing the results of AHIMS Search for Client Service ID: 537914





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### AHIMS Sites in Extensive Search area

Royal Far West Manly

Prepared on behalf of Royal Far West

Project No: P0019382

Project Manager: Andrew Crisp

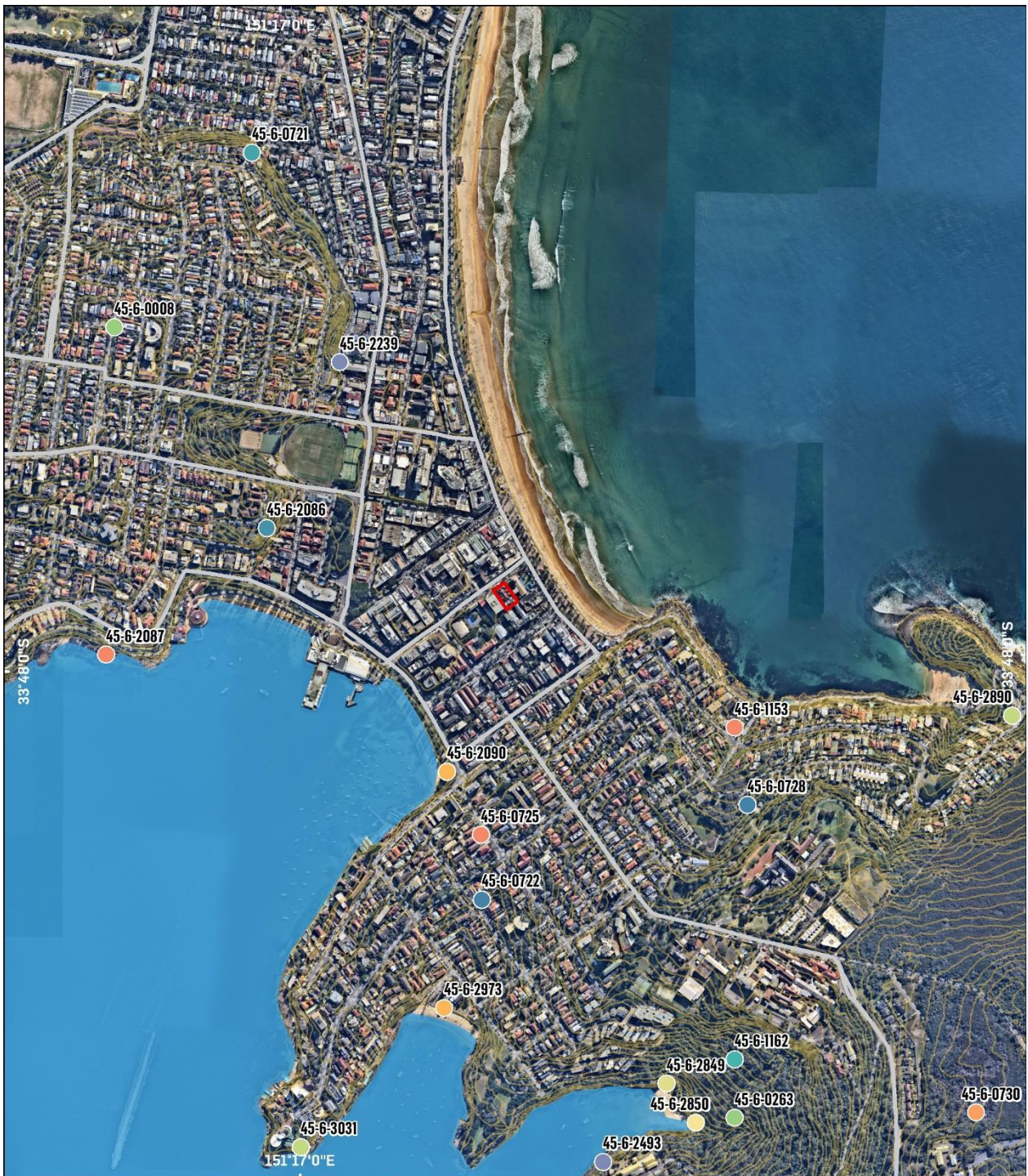
Subject Area

- Contours
- Hydrology
- Art Site
- Artefact Site
- Burial/s
- Burial/s with Midden
- Earth Mound
- Grinding Grooves
- Grinding Grooves with Art
- Habitation Structure
- Habitation Structure with Earth Mound

- Midden
- Midden with Artefact/s
- Not a Site
- PAD
- Quarry
- Shelter with Art
- Shelter with Art and Artefact/s
- Shelter with Art and Midden
- Shelter with Artefact/s
- Shelter with Burial/s, Art and Midden
- Shelter with Midden

Figure 29 – Registered AHIMS sites





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Project No: P0019382

Project Manager: Andrew Crisp

- |              |               |                                       |                                 |                             |
|--------------|---------------|---------------------------------------|---------------------------------|-----------------------------|
| Subject Area | Art Site      | Habitation Structure                  | Not a Site                      | Shelter with Art and Midden |
| Hydrology    | Artefact Site | Habitation Structure with Earth Mound | Shelter with Art                | Shelter with Artefact/s     |
| Contours     | Burial/s      | Midden                                | Shelter with Art and Artefact/s | Shelter with Midden         |

### AHIMS Sites in proximity

Royal Far West Manly  
Prepared on behalf of Royal Far West

Figure 30 – Registered AHIMS sites within the vicinity of the subject area

### **4.1.5. Geology and Soils**

The subject area is located within the Sydney Basin bioregion and primarily within the Narrabeen Soil Landscape (9130na), although the western portion of the subject area is at the margins of the Woy Woy Soil Landscape (9130ww) (Figure 31).

The Narrabeen Soil Landscape is described as residing on beaches and coastal foredunes on marine sands. Soils are described as deep (>200 cm) Calcareous Sands (Uc1.11, Uc1.12) on beaches, with Siliceous Sands (Uc1.21, Uc1.22) and occasional calcareous compressed sands on foredunes. Dominant soil materials include loose orange shelly beach sand and loose yellowish-brown quartz sand.

The Woy Woy Soil Landscape is described as residing on level to gently undulating non-tidal beach ridges on marine sands. Soils are described as deep (>200 cm) Siliceous Sands (Uc1.22, Uc5.11) and occasional Podzols (Uc2.3) on sandy rises, Humus Podzols (Uc4.2) in poorly drained areas and Calcareous Sands (Uc1.11, Uc1.13) near beaches. Dominant soil materials include dark brown loose loamy sand, grey loose sand and brown loose sand.

Predictive modelling based on previous archaeological studies identifies sand dune systems, such as the Narrabeen and Woy Woy Soil Landscapes, as generally having high potential for Aboriginal objects.

The depth of natural soils is relevant to the potential for archaeological materials to be present, especially in areas where disturbance is high. In general, as disturbance level increases, the integrity of any potential archaeological resource decreases. However, disturbance might not remove the archaeological potential even if it decreases integrity of the resources substantially. The deep soils of the Narrabeen Soil Landscape in which the subject area is located may mitigate the effects of ground disturbance on archaeological potential.

### **4.1.6. Vegetation and Resources**

There is no remnant vegetation currently present within the subject area due to historical land clearance. At the time of European settlement, the subject area would likely have been covered by spinifex grassland/herbland and closed-scrub, consistent with the foredunes of the Narrabeen Soil Landscape. The western portion of the subject area may have merged with the closed-scrub and low eucalypt woodland of the Woy Woy landscape.

Resources would include a variety of floral and faunal species that may have been utilised by Aboriginal people for medicinal, ceremonial and subsistence purposes.

### **4.1.7. Hydrology**

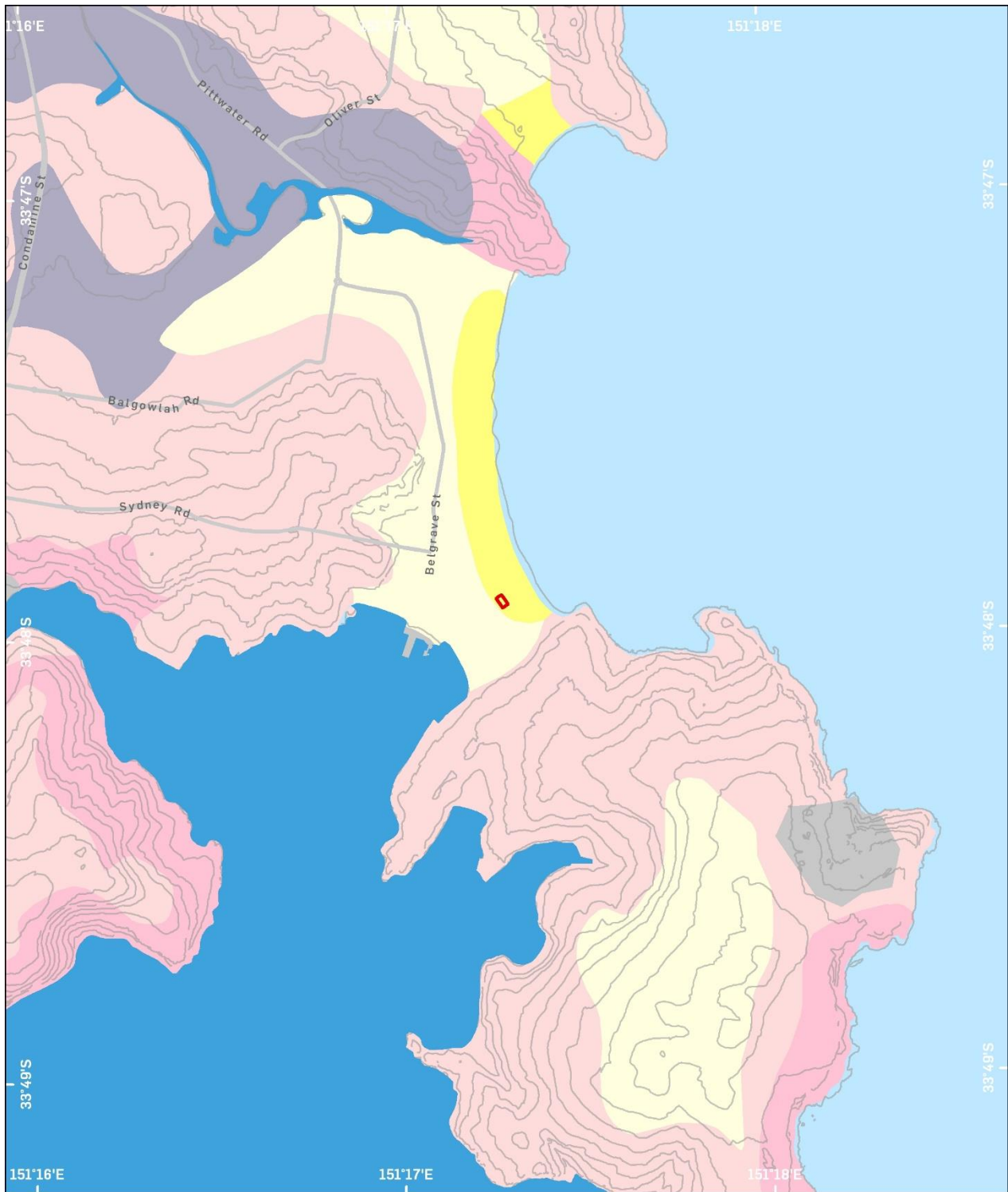
The subject area is located on an isthmus, with the Pacific Ocean approximately 100 to the east and North Harbour approximately 250m to the south west.

Predictive modelling based on previous archaeological studies indicates that sites can be anticipated to be higher in frequency and density within approximately 200m of water, including coastlines. This prediction is reinforced by the analysis of the AHIMS presented in Section 4.1.4 above. The proximity of the subject area to the coastline suggests a high potential for finding Aboriginal objects in the subject area.

### **4.1.8. Landform**

The present subject area is an isthmus. An isthmus is a narrow strip of land that connects two larger landmasses and separates two bodies of water. This landform would have been of strategic importance and utilised heavily by Aboriginal people transiting between the headland and mainland. As such this landform is associated with moderate to high Aboriginal archaeological potential.





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### SOIL LANDSCAPES AND HYDROLOGY

Royal Far West Manly  
Prepared on behalf of Royal Far West

Project No: P0019382

Project Manager: Andrew Crisp

- Subject Area
- Aeolian (AEnh)
- Beach (BEEna)
- Disturbed Terrain (DTxx)
- Swamp (SWwa)
- Hydrology
- Aeolian (AEww)
- Colluvial (COha)
- Colluvial (COWN)
- Erosional (ERgy)
- Water
- Contours
- Erosional (ERla)

Figure 31 – Soil Landscapes and Hydrology



## 4.2. HISTORICAL ARCHAEOLOGY

This section provides a high-level assessment of the historical archaeological potential of the subject area.

### 4.2.1. Archaeological Potential

In addition to the built structures and open space on the site, there may also be archaeological evidence relating to the existing buildings and uses, or earlier buildings and uses (now demolished).

Archaeological Potential is defined as<sup>47</sup>:

*The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research. Common units for describing archaeological potential are:*

- *known archaeological features/sites (high archaeological potential);*
- *potential archaeological features/sites (medium archaeological potential);*
- *no archaeological features/sites (low archaeological potential).*

The archaeological resources of any site are finite but have the potential to provide insights into everyday life that are not available from any other resource. Archaeological resources may provide evidence that will enhance the historical record and, as such, make a contribution to an understanding of the history and settlement of a local region. In view of the costs involved in archaeological excavation of a site, a clear justification for any archaeological excavation needs to include the following considerations:

- What is the likely integrity of the archaeological resource? Is it likely that largely intact physical evidence would be exposed during excavations such as structural features, artefacts from underfloor deposits, rubbish- or cess-pits, wells or other features with an ability to contribute meaningfully to an understanding of the development of the site as part of the wider development of Sydney?
- What is the research potential of the archaeological resource? Is it likely that the results of the excavation make a significant or important contribution to an understanding of wider research issues regarding the early settlement and development of Sydney?

The archaeological potential of the subject site is considered to be medium to low. Places mentioned in the following assessment are discussed in the history (Section 3.2) and revisited below.

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 (Figure 17) 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.

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<sup>48</sup>.

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<sup>47</sup> Department of Urban Affairs and Planning 1996

<sup>48</sup> *Sands Directory*

Figure 32 – Sandhurst, late 19<sup>th</sup> century



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

Various stages of development of Drummond House are likely to have disturbed the archaeological remains of the former Sandhurst. The area considered to have low archaeological potential is the footprint of Drummond House. Potential archaeological resources in this area would likely have been disturbed for excavation and construction of this buildings.

Prior to any major excavation at the site, including new development, the site's archaeological potential should be further assessed. Information from the archaeological resource can add to information about the site that is not found in any other source

# 5. COMPARATIVE ANALYSIS

## 5.1. OVERVIEW OF ARCHITECT

David Thomas Morrow of Morrow and Gordon designed Drummond House (1934).

David Thomas Morrow started his own architectural practice in 1897, was joined by William de Putron in 1909, and Percy James Gordon in 1921. Morrow resigned in 1932 and Drummond House may have been one of the last buildings he designed.


Notable commercial buildings designed by the firm include the Grace Building (c. 1928) and AWA Building (c.1937). Significant domestic residences include Babworth House (c.1912) for Samuel Horden and Hopewood House for Lebbeus Horden, both at Darling Point.<sup>49</sup>

Although Drummond House has been substantially altered, externally with a third storey addition and internally with the changing needs of the Scheme, it is considered to be of some architectural merit and has a strong connection to the Far West Scheme being its first purpose built building.

In comparison to other buildings designed by Morrow, Drummond House was probably built with limited funds available to the Scheme and the use of the building. Drummond House when compared with other examples of the firms work, including Babworth House, Curzon Hall and Retford Park Mansion, is clearly a restrained example. Drummond House was designed as a functional institutional building and does not display any of the finesse evident in the firms more celebrated buildings. Drummond House by comparison is not representative of the calibre of architecture the firm is known for and is a modified and pedestrian example of the Inter-War Stripped Classical style.



## 5.2. COMPARISON TABLE


Table 2 Comparative Analysis Table – Morrow & De Putron/Gordon




Heritage Item	Established Statement of Significance	Photo
<p>"Bay House" Including Interior  76-82 Bay Street, Ultimo, NSW 2007</p>	<p>Fine example of a four storey facebrick Federation Free Classical style Commercial Building, which makes an important contribution to the streetscape of Bay Street. It is designed by the prominent architectural practice of Morrow and Deputron and provides evidence of the development of the Grace Bros Retail Empire in the early 20th century.</p>	

<sup>49</sup> State Library 2011



Heritage Item	Established Statement of Significance	Photo
<p>"Fayworth House" Including Interior</p> <p>379-383 Pitt Street, Sydney, NSW 2000</p>	<p>Fayworth House is part of an ongoing tradition of centralising commercial, financial and professional dealings within the CBD having particular associations with a well known Australian retailing firm. The choice of site reflects the importance of this portion of the CBD as retail precinct in the 1920s-30s, and retail growth after World War I. It is a good example of the Chicagoesque style, uncommon in Sydney's CBD, with limited use of classical ornamentation. It has landmark presence on a prominent corner site in the southern CBD townscape. The two stages of construction mark the transition from a timber column and beam structure with load bearing masonry walls on the lower two floors, to the post-World War II steel framed upper section.</p>	
<p>Babworth House</p> <p>Mount Adelaide Road, Darling Point, NSW 2027</p>	<p>Babworth House is one of the largest, finest and most intact examples of an early twentieth century grand house in Australia. It is of national significance both historically and aesthetically. Babworth House is an excellent and rare example of the Federation Arts and Crafts style in grand domestic architecture in Australia. The quality and uniqueness of the exterior and interior detailing, incorporating both Art Nouveau and neoclassical motifs and forms is of a standard and scale rarely seen in domestic architecture. The workmanship and detailing of the external cement render work is of national significance technically. Babworth's garden is an integral part of the design for the whole estate and, although the estate is reduced in size, the gardens and grounds provide a substantially intact and highly appropriate setting to the grand mansion. The built garden elements such as stairs, balustrades, grottoes and faux-rockwork amplify the scale of the mansion and demonstrate high technical accomplishment by using the same high standard of construction as the house. The Babworth estate, including house, garden and outbuildings, is representative of the large villa estate established by the wealthy elite of Darling Point during the nineteenth and early twentieth centuries. It demonstrates an affluence and lifestyle which could only be supported by a very large range of live-in servants and which was</p>	

Heritage Item	Established Statement of Significance	Photo
	<p>rare following the First World War. Babworth House was built as the home of Sir Samuel Hordern, a fourth generation member of the notable Sydney Commercial family who founded the famous Anthony Hordern's stores. Sir Samuel was a well-known and influential member of Sydney society. Babworth represents the continuing association of the Hordern family with Darling Point from 1864 through to 1956. The garden is a major extant private collection of plants dating from the nineteenth and early twentieth century. It also contains various plants which are rare or otherwise uncommon in cultivation in Sydney as well as rare indigenous species that have persisted since before site development.</p>	
<p>Curzon Hall - Federation free style mansion</p> <p>53-71 Agincourt Road, Marsfield, NSW 2122</p>	<p>Curzon Hall completed 1899, is of historical significance as one of the last built of the grand gentlemen's villas of the Ryde district, and as the residence of entrepreneur Harry Smith and his family from 1899-1921. During its period as a residence, it was a well-known social venue. Curzon Hall is also of historical significance for its operation as a Catholic seminary from 1922-1982, and as a well-known wedding reception/function centre since 1983. Curzon Hall has historical association with entrepreneur Harry Smith and his family (1897-1921), and with the Catholic Order of the Vincentian Fathers, who operated a Seminary on the property 1922-1982. Curzon Hall is of aesthetic significance as a grand, eclectic example of a Federation Free Classical style residence set within large grounds, on a prominent corner site at the junction of Agincourt and Balaclava Roads, Marsfield. The house is also of historical and aesthetic significance for its design by architect David Thomas Morrow.</p>	

Heritage Item	Established Statement of Significance	Photo
<p>Former "Grace Building" Including Interiors</p> <p>77-79 York Street, Sydney, NSW 2000</p>	<p>Of architectural significance as Sydney's finest example of Skyscraper Gothic. Illustrates American inspiration of Australian commercial architecture. Of environmental significance as a distinctive landmark in the city. Its physical relationship to Broughton House (312-318 Kent Street) allows an interesting contrast of 19th and 20th century styles in significant buildings of a similar mass.</p>	
<p>Former "Snow's Emporium" Including Interiors</p> <p>127-131 Liverpool Street, Sydney, NSW 2000</p>	<p>The Coles Fossey building, formerly Snows, is a six storey building of Federation Free Classical Style located on a prominent corner site. The building, in association with Fayworth House and the former Mark Foy building, is historically significant for its ability to demonstrate the inter-war significance of the Liverpool Street-Pitt Street area as one of Sydney's major retail precincts. The building is an example of a highly intact original commercial exterior of quality design particularly noted for its use of decorative framing. The building is significant for its contribution as a landmark corner building to the Liverpool and Pitt Street streetscapes. The building's association with Sydney Snow is socially significant for its ability to recall the important employment opportunities that drapery stores like Snow's offered for young women.</p>	
<p>Retford Park Mansion</p> <p>Old South Road, Bowral, NSW 2576</p>	<p>N/A</p>	



# 6. HERITAGE SIGNIFICANCE

## 6.1. WHAT IS HERITAGE SIGNIFICANCE?

Before making decisions to change a heritage item, it is important to understand its values. This leads to decisions that will retain these values in the future. Statements of heritage significance summarise a place’s heritage values – why it is important, why a statutory listing was made to protect these values. An assessment of a place’s values is undertaken to provide a state of significance.

## 6.2. SIGNIFICANCE ASSESSMENT

The Heritage Council of NSW has developed a set of seven criteria for assessing heritage significance. There are two levels of heritage significance used in NSW: state and local.

The following assessment of heritage significance has been prepared in accordance with the ‘Assessing Heritage Significance’ (2001) guideline from the *NSW Heritage Manual* for subject site.

Table 3 – Assessment of Heritage Significance

Criteria	Significance Assessment
<p>A – Historical Significance</p> <p><i>An item is important in the course or pattern of the local area’s cultural or natural history.</i></p>	<p>The Royal Far West site in Manly has historical significance at a local level as the location of the Royal Far West Children’s Health Scheme first building, Drummond House. The Scheme was established in Manly in 1924 and also has associations with the greater area.</p> <p>Since 1935, Drummond House was the Scheme’s headquarters and as demand for services grew.</p> <p>The Scheme was officially given the title of “Royal” in 1970 by Her Majesty Queen Elizabeth II and Princess Anne, in recognition of its long service to country children.</p>
<p><u>Guidelines for Inclusion</u></p> <p>shows evidence of a significant human activity <input type="checkbox"/></p> <p>is associated with a significant activity or historical phase <input checked="" type="checkbox"/></p> <p>maintains or shows the continuity of a historical process or activity <input type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>has incidental or unsubstantiated connections with historically important activities or processes <input type="checkbox"/></p> <p>provides evidence of activities or processes that are of dubious historical importance <input type="checkbox"/></p> <p>has been so altered that it can no longer provide evidence of a particular association <input type="checkbox"/></p>
<p>B – Associative Significance</p> <p><i>An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area’s cultural or natural history.</i></p>	<p>The Far West Children’s Scheme has associative significance at a local level with various important persons who established and developed the Scheme in its early years.</p> <p>Stanley Drummond and his wife Lucy founded the Scheme in 1924 and were instrumental in the first 18 years of its development. Drummond House is named</p>

Criteria	Significance Assessment
	<p>after Stanley and the rear 1960s annexe is named after Lucy.</p> <p>David Thomas Morrow of Morrow and Gordon designed Drummond House in 1934, and Percy James Gordon then offered his services, both acting as Honorary Architects.</p>
<p><u>Guidelines for Inclusion</u></p> <p>shows evidence of a significant human occupation <input type="checkbox"/></p> <p>is associated with a significant event, person, or group of persons <input checked="" type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>has incidental or unsubstantiated connections with historically important people or events <input type="checkbox"/></p> <p>provides evidence of people or events that are of dubious historical importance <input type="checkbox"/></p> <p>has been so altered that it can no longer provide evidence of a particular association <input checked="" type="checkbox"/></p>
<p>C – Aesthetic Significance</p> <p><i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i></p>	<p>Drummond House is considered to have limited aesthetic significance as a highly altered inter-war stripped classical building which has been compromised through multiple phases of later works.</p>
<p><u>Guidelines for Inclusion</u></p> <p>shows or is associated with, creative or technical innovation or achievement <input type="checkbox"/></p> <p>is the inspiration for a creative or technical innovation or achievement <input type="checkbox"/></p> <p>is aesthetically distinctive <input type="checkbox"/></p> <p>has landmark qualities <input type="checkbox"/></p> <p>exemplifies a particular taste, style or technology <input type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>is not a major work by an important designer or artist <input type="checkbox"/></p> <p>has lost its design or technical integrity <input checked="" type="checkbox"/></p> <p>its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded <input checked="" type="checkbox"/></p> <p>has only a loose association with a creative or technical achievement <input type="checkbox"/></p>
<p>D – Social Significance</p> <p><i>An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</i></p>	<p>The Royal Far West site has social significance to the community for its provision of medical care to thousands of children from remote areas in NSW, who otherwise had limited access to health care for over 85 years. It is highly likely that a different building providing the same services and use would have a similar value to the community, and therefore the significance to the community is vested in the use of the place and not the building fabric itself.</p>

Criteria	Significance Assessment
<p><u>Guidelines for Inclusion</u></p> <p>is important for its associations with an identifiable group <input checked="" type="checkbox"/></p> <p>is important to a community's sense of place <input type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>is only important to the community for amenity reasons <input checked="" type="checkbox"/></p> <p>is retained only in preference to a proposed alternative <input checked="" type="checkbox"/></p>
<p>E – Research Potential</p> <p><i>An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.</i></p>	<p>The archaeological potential of the site has been reviewed at a high level in this CMP however further analysis is required to determine the potential archaeological resource and its significance. While earlier structures in the area are known, their precise location is unknown and it is not certain whether previous structures existed on the subject site.</p>
<p><u>Guidelines for Inclusion</u></p> <p>has the potential to yield new or further substantial scientific and/or archaeological information <input type="checkbox"/></p> <p>is an important benchmark or reference site or type <input type="checkbox"/></p> <p>provides evidence of past human cultures that is unavailable elsewhere <input type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>the knowledge gained would be irrelevant to research on science, human history or culture <input type="checkbox"/></p> <p>has little archaeological or research potential <input type="checkbox"/></p> <p>only contains information that is readily available from other resources or archaeological sites <input type="checkbox"/></p>
<p>F – Rarity</p> <p><i>An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.</i></p>	<p>The building is not considered to be rare in the local area or throughout Sydney as a modified example of an inter-war stripped classical building.</p>
<p><u>Guidelines for Inclusion</u></p> <p>provides evidence of a defunct custom, way of life or process <input type="checkbox"/></p> <p>demonstrates a process, custom or other human activity that is in danger of being lost <input type="checkbox"/></p> <p>shows unusually accurate evidence of a significant human activity <input type="checkbox"/></p> <p>is the only example of its type <input type="checkbox"/></p> <p>demonstrates designs or techniques of exceptional interest <input type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>is not rare <input checked="" type="checkbox"/></p> <p>is numerous but under threat <input type="checkbox"/></p>



Criteria	Significance Assessment
shows rare evidence of a significant human activity important to a community <input type="checkbox"/>	
<p>G – Representative</p> <p><i>An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):</i></p> <p><i>cultural or natural places; or</i></p> <p><i>cultural or natural environments.</i></p>	<p>Drummond House is a typical representative example of the Inter-War Classical style however it is not considered to be a fine example of the type and is of limited integrity.</p>
<p>Guidelines for Inclusion</p> <p>is a fine example of its type <input type="checkbox"/></p> <p>has the principal characteristics of an important class or group of items <input type="checkbox"/></p> <p>has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity <input type="checkbox"/></p> <p>is a significant variation to a class of items <input type="checkbox"/></p> <p>is part of a group which collectively illustrates a representative type <input type="checkbox"/></p> <p>is outstanding because of its setting, condition or size <input type="checkbox"/></p> <p>is outstanding because of its integrity or the esteem in which it is held <input type="checkbox"/></p>	<p><u>Guidelines for Exclusion</u></p> <p>is a poor example of its type <input checked="" type="checkbox"/></p> <p>does not include or has lost the range of characteristics of a type <input checked="" type="checkbox"/></p> <p>does not represent well the characteristics that make up a significant variation of a type <input type="checkbox"/></p>

## 6.3. ESTABLISHED STATEMENT OF SIGNIFICANCE – 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.<sup>50</sup>*

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.

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<sup>50</sup> Heritage NSW, State Heritage Inventory, The Drummond Far West Home, <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020103>

## 6.4. LEVELS AND GRADING OF SIGNIFICANCE

The Heritage Council of NSW recognises four levels of heritage significance in NSW: Local, State, National and World. The level indicates the context in which a heritage place/item is important (e.g. local heritage means it is important to the local area or region). Heritage places that are rare, exceptional or outstanding beyond the local area or region may be of State significance.

In most cases, the level of heritage significance for a place/item has a corresponding statutory listing and responsible authority for conserving them.

Different components of a place may contribute in different ways to its heritage value. The gradings of significance developed by the Heritage Council of NSW have been modified as part of this report follows:

Table 4 – Gradings of significance definitions

Grading	Justification
E (Exceptional)	Rare or outstanding elements that directly contribute to the place's overall heritage significance; they retain a high degree of integrity and intactness in fabric or use; any change should be minimal and retain significant values or fabric
H (High)	Element demonstrates a key aspect of the place's overall heritage significance; they have a high degree of original fabric or they retain their original use; alterations do not detract from significance
M (Moderate)	Element contributes to the place's overall heritage significance; they may have been altered but they still have the ability to demonstrate a function or use particular to the site; change is allowed so long as it does not adversely affect the place's overall heritage significance
L (Little)	Element may be difficult to interpret or may have been substantially modified which detracts from its heritage significance; change is allowed so long as it does not adversely affect the place's overall heritage significance
N (Neutral)	Elements do not add or detract from the site's overall heritage significance; change allowed
I (Intrusive)	Elements are damaging to the place's overall heritage significance; can be considered for removal or alteration

Each element's significance has been graded having specific regard to its contribution to the overall significance of the property, its period of construction and its condition. We have identified the corresponding condition status for the elements as follows:

Table 5 – Gradings of condition definitions



Grading	Justification
E (Excellent)	Element has no defects. Condition and appearance are stable and not deteriorating.
G (Good)	Element exhibits superficial wear and tear, minor defects, minor signs of deterioration to surface finishes, but does not require major maintenance. No major defects exist.
F (Fair)	Element is in average condition. Deteriorated surfaces require attention. Services are functional but require attention. Deferred maintenance work exists.
P (Poor)	Element has deteriorated badly. Serious structural problems exist. General appearance is poor with eroded protective coatings. Elements are defective, services are frequently failing, and significant number of major defects exists.
VP (Very Poor)	Element has failed. It is not operational and is unfit for occupancy or normal use.
U	Unknown. Unable to access to assess condition.



## 6.5. SCHEDULE OF SIGNIFICANT ELEMENTS

The following tables outline the significant elements (spaces, features and fabric) of Drummond House's exterior and interior.

Table 6 Gradings of Significant Elements

Element	Condition	Grading of Significance
<b>Non-tangible</b>		
Ongoing use as a charitable institution	Good	High
<b>Building Form</b>		
Overall form of the principal wing to Wentworth Street 	Fair – modified building form from the original design with the addition of a third storey and alteration of the original design.	Moderate
Overall form of the secondary rear wings of the main building 	Fair – modified building form from the original design with the addition of a third storey and alteration of the original design.	Little
Later additions and extensions overall form and fabric	Fair	Neutral
<b>Exterior</b>		
Roof form and fabric	Good – non original roof form and fabric. The roof was originally flat with a parapet edge but a hipped roof form was constructed when the third storey was added.	Little – original building footprint Neutral – rear additions
Principal elevation fabric to Wentworth Street overall form and composition	Fair – modified from original design with addition of the third storey and associated modifications to roof form, modification of principal façade	Moderate

<b>Element</b>	<b>Condition</b>	<b>Grading of Significance</b>
	elements and painting of face brickwork.	
Masonry façade elements including brickwork and cement rendered elements to original building footprint	Fair – paint obscures original brickwork finish	Moderate – masonry elements Intrusive - paint
Open balconies including double Tuscan columns with Doric capitals and original steel balustrades	Fair – modifications have obscured original elements	Moderate
Rear later additions, fabric, form etc	Fair	Neutral
Windows	Fair	Moderate – original timber framed Neutral – later replacements
Doors	Fair	Moderate – original timber entrance doors with highlight and side lights Little – all other doors including later doors
<b>Interior</b>		
Walls	Fair	Little – original masonry walls Neutral – later plasterboards walls and reconfigured spaces
Flooring – concrete slab	Fair	Little – slab Neutral – floor coverings etc
Original stairs and lift well	Fair	Little
Internal fixtures and fittings	Fair – all later insertions	Neutral
All interior elements in later additions and extensions.	Fair	Neutral

# 7. HERITAGE LISTINGS & STATUTORY OBLIGATIONS

## 7.1. HERITAGE LISTINGS

The following heritage listings apply to the subject site.

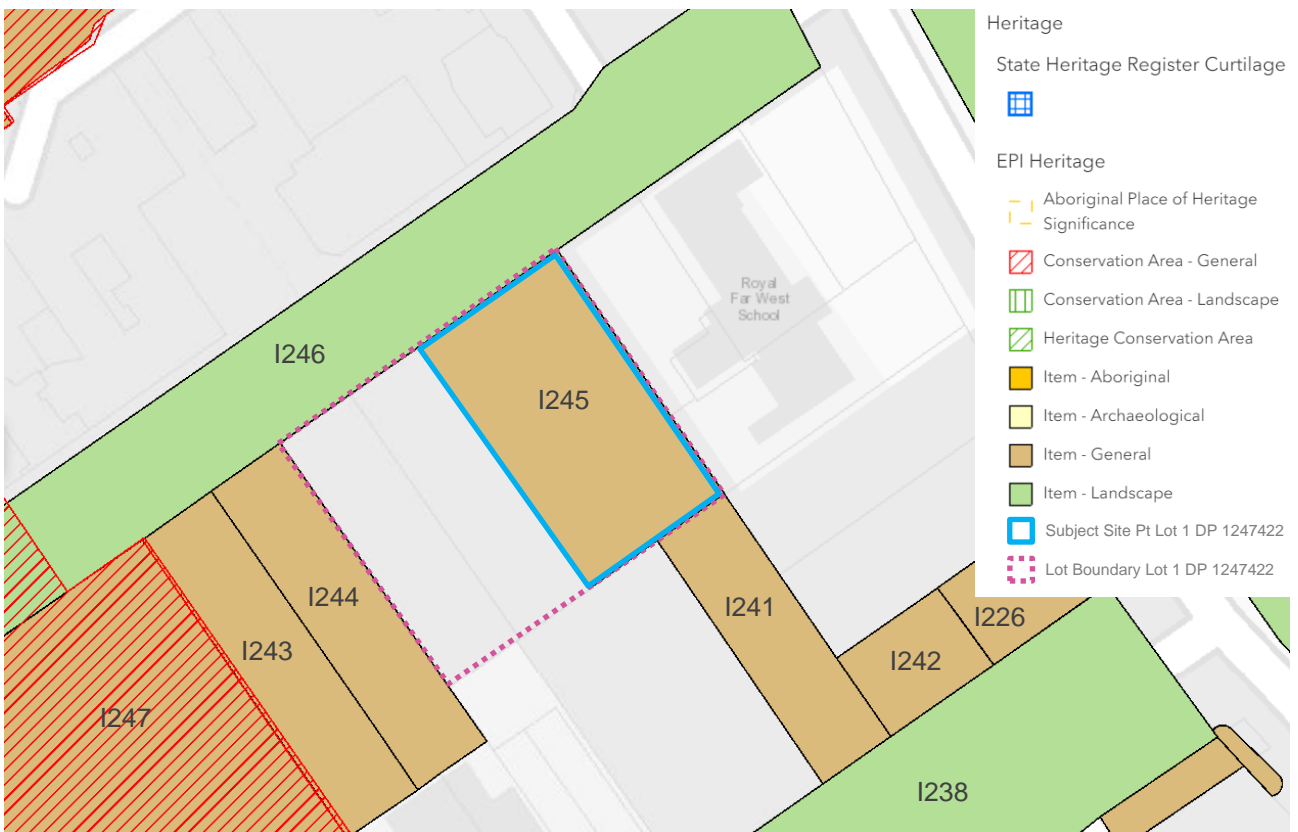
Table 7 – Heritage Listings

Type of Listing	Name of Item	Assessed Level of Significance
<b>STATUTORY LISTINGS</b>		
<b>World Heritage List</b> under the World Heritage Convention (places of outstanding universal value)	Not applicable	Not applicable
<b>National Heritage List</b> 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
<b>Aboriginal Heritage</b> under the National Parks and Wildlife Act 1974 (places that hold great meaning and significance to Indigenous people)	Not applicable	Not applicable
<b>Commonwealth Heritage List</b> 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
<b>NSW State Heritage Register</b> under the Heritage Act 1977 (items of state significance)	Not applicable	Not applicable
<b>State Government Agency Section 170 Heritage and Conservation Register</b> under the Heritage Act 1977 (items of local or state significance)	Not applicable	Not applicable
<b>Manly Local Environmental Plan 2013</b> 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 The Drummond Far West Home, 22 Wentworth Street	Local



Type of Listing	Name of Item	Assessed Level of Significance
<b>NON-STATUTORY LISTINGS</b>		
<b>Conservation Areas</b> under the Manly Development Control Plan 2013	Not applicable	Not applicable
<b>National Trust of Australia</b> (items of local, state or national significance)	Not applicable	Not applicable
<b>Register of the National Estate (not operational)</b> under the Environment Protection and Biodiversity Conservation Act 1999 (items of local, state or national significance)	Not applicable	Not applicable
<b>Australian Institute of Architects</b> Register of Significant Architecture in NSW	Not applicable	Not applicable
<b>Institution of Engineers Australia</b> (no official register but informal list of buildings that have heritage value)	Not applicable	Not applicable

Figure 33 – Extract of Heritage Map



Source: NSW Planning Portal

The following heritage items are located within close vicinity of the subject site:

Table 8 Vicinity Heritage Items

<b>Heritage Item</b>	<b>Description</b>
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, Lot 1, DP 65862
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

## 7.2. STATUTORY OBLIGATIONS

Works to the subject site may require particular approvals depending on the nature of proposed works. Key commonwealth, state and local legislation, plans, policies and programs and committees affecting the management of the place are described below. This Section should be referred to in addition to other management plans for the site.

### 7.2.1. Commonwealth Legislation and Policies

#### 7.2.1.1. Environmental Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the Australian Government's environment and heritage legislation. This act is triggered by developments or actions that will have a significant impact on matters of National environmental significance, including world heritage areas, Commonwealth marine areas, nationally threatened species and communities and migratory birds. The EPBC Act includes a process for assessment of proposed actions that have, or are likely to have, a significant impact on matters of national environmental significance. These actions require approval from the Commonwealth Minister, Environment and Heritage.

A new national heritage system was established in January 2004 under the EPBC Act. This led to the introduction of the National Heritage List, which recognises and protects places of outstanding heritage to the Nation, and the Commonwealth Heritage List, which includes Commonwealth owned or leased places of significant heritage value.

**Drummond House is not listed on the National and/or Commonwealth Heritage Lists.**

#### 7.2.1.2. National Construction Code (incl Building Code of Australia)

The National Construction Code (NCC), incorporating the Building Code of Australia (BCA), is a national set of building regulations with some state-specific variations. The performance requirements of the BCA are mandatory, although the introductory sections of the Code make clear that not all requirements will apply to a given case. The Code also includes 'deemed-to-satisfy' requirements which are accepted as meeting the performance requirements. However, the Code also makes provision for alternative solutions to meet the performance requirements, subject to satisfactory verification.

Under the *NSW Environmental Planning and Assessment (EP&A) Regulation 2000*, all new building work must be carried out in accordance with the BCA. In the case of an existing building, there is generally no requirement to comply with the BCA unless works are being carried out. However, where works (in particular alterations or additions) are proposed to the place, the building will need to comply on completion with the relevant [performance] requirements of the Building Code of Australia (EP&A Regulation Clause 145). In addition, where an existing building has a change of use, the structural capacity and fire safety of the building must be appropriate for the new use, while for a building which undergoes alterations without a change of use, the structural capacity and fire safety of the building must not be reduced by the work (EP&A Act Regulation Clause 143).

In certain circumstances, exemption can be obtained from the requirements of the BCA under Clause 187 of the EP&A Regulation. Because in most cases there will be an acceptable alternative solution to satisfy the performance requirements of the BCA, applications for exemption are sought rarely. If such an application is contemplated, it should be sought at development application stage. The Fire, Access and Services Advisory Panel of the Heritage Council of NSW may be able to assist in resolving conflicts between heritage and regulatory requirements.

#### **Australian Standard AS1428 (Universal Access) / Disability (Access to Premises — Buildings) Standards 2010 (Disability Discrimination Act 1992)**

The objective of this Standard is to provide building designers and users (architects, property owners, regulators, and the like) with the minimum design requirements for new building work to enable access for people with disabilities.

Because of the variety of situations that may need to be addressed when designing buildings and facilities, it is necessary for the Standards to provide a range of data so that the requirements for access can be met and to also allow for flexibility in design where limitations are imposed by other building conditions. The intention is to make the Standard a practical reference document for designers, particularly regarding problem areas such as doorways and sanitary facilities.



To minimise adverse interventions and to assist in maximising the exposure of significant heritage fabric, alternate solutions to the deemed to satisfy provisions of the BCA should be derived from performance based assessments particularly in relation to structural provisions, fire resistance and stability, fire separation, provisions for access and egress, sound transmission and isolation, and energy efficiency.

## 7.2.2. NSW Legislation and Policies

### 7.2.2.1. Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) governs strategic planning and development assessment processes undertaken by State and Local Government in NSW. The Act requires that Local Governments prepare planning instruments (such as Local Environmental Plans [LEPs] and Development Control Plans [DCPs]) in accordance with the Act to provide guidance on the level of environmental assessment required.

Approval is required under this Act for alterations and additions to the subject site. Heritage advice or assessment may be required if works are likely to impact on the overall heritage significance of the place or elements identified in this report as being of exceptional or high significance.

**Drummond House falls within the boundaries of the Northern Beaches amalgamated Local Government Area and is covered by the Manly LEP 2013 and the Manly DCP 2013.**

### 7.2.2.2. Heritage Act 1977

#### State Heritage Register

The Heritage Act is administered by Heritage NSW of the Department of Premier and Cabinet. The purpose of the *Heritage Act 1977* is to ensure cultural heritage in NSW is adequately identified and conserved. The Act is the primary item of State legislation affording protection to items of environmental heritage (natural and cultural) in NSW. Under the *Heritage Act 1977*, 'items of environmental heritage' include places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. State significant items are listed on the NSW State Heritage Register (SHR) under Section 60 of the Act and are afforded protection against activities that may damage an item or affect its heritage significance.

Buildings on the SHR are subject to requirements under the *Heritage Act 1977*. An application must be lodged with the Heritage Council of NSW or Heritage NSW as delegate, and approval is required prior to any modifications to the building being carried out. Works will require approval either as Integrated Development (via Northern Beaches Council) or Section 60 Applications (directly through the Heritage Council of NSW). This applies except where works are exempt under either standard or site specific exemptions or where conservation works are in accordance with a Heritage Agreement or where works are in accordance with an endorsed Conservation Management Plan (CMP) or site specific Development Control Plans (DCP).

Buildings on the SHR are also required to be maintained in accordance with the *Minimum Standards of Maintenance and Repair* found under section 1.6 *Heritage Regulation 2012* under the *Heritage Act 1977*.

**Drummond House is not listed on the SHR.**

#### Historical Archaeology

Historical relics are also protected under the *Heritage Act 1977* throughout all areas of NSW. If historic relics are discovered on the site during any maintenance or construction works, Heritage NSW of the Department of Premier and Cabinet must be notified under Section 139 of the Act.

Section 4(1) of the Heritage Act (as amended 2009) defines 'relic' as follows:

*"relic means any deposit, artefact, object or material evidence that:*

*(a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and*

*(b) is of State or local heritage significance."*

Sections 139-145 of the Heritage Act prevent the excavation or disturbance of land known or likely to contain relics, unless in accordance with an excavation permit. Section 60 excavation permits are required to disturb relics within SHR sites, while Section 140 permits are required for sites that are not listed on the SHR. Under the provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act), excavation permits to disturb relics under Section 60 or Section 140 of the Heritage Act are not required for State Significant Development (SSD) projects.

### 7.2.2.3. National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* is administered by Heritage NSW of the Department of Premier and Cabinet. Under the Act, the Director-General of the National Parks and Wildlife Service is responsible for the care, control and management of all national parks, historic sites, nature reserves, reserves, Aboriginal areas and state game reserves. State conservation areas, karst conservation reserves and regional parks are also administered under the Act. The Director-General is also responsible for the protection and care of native fauna and flora, and Aboriginal places and objects throughout NSW (consisting of any material evidence of the Aboriginal occupation of NSW) under Section 90 of the Act, and for 'Aboriginal Places' (areas of cultural significance to the Aboriginal community) under Section 84.

If Aboriginal objects and places are found, the National Parks and Wildlife Service must be informed under Section 91 of the Act and permits may apply under Section 90. A licence may also be required under the Act to damage or destroy threatened fauna species. Penalties apply for the destruction of Aboriginal objects and places, and the harm of any protected species. There are Interim Guidelines for Consultation associated with applications for permits under Section 90 of the Act.

The protection provided to Aboriginal objects applies irrespective of the level of their significance or issues of land tenure. However, areas are only gazetted as Aboriginal Places if the Minister is satisfied that sufficient evidence exists to demonstrate that the location was and/or is, of special significance to Aboriginal culture.

The Act was amended in 2010 and as a result the legislative structure for seeking permission to impact heritage items has changed. A Section 90 permit is now the only AHIP available and is granted by heritage NSW. Various factors are considered by Heritage NSW in the AHIP application process, such as site significance, Aboriginal consultation requirements, ESD principles, project justification and consideration of alternatives. AHIPs are not required for SSD projects.

As part of the administration of Part 6 of the Act, Heritage NSW has developed regulatory guidelines on Aboriginal consultation, which are outlined in *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (2010). Guidelines have also been developed for the processes of due diligence - *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (2010), and for investigation of Aboriginal objects - *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010) in accordance with the 2010 amendment to the Act.

### 7.2.2.4. State Environmental Planning Policies

State Environmental Planning Policies (SEPPs) deal with issues significant to the state and people of New South Wales. Multiple SEPPs apply to the subject site.

Exempt and Complying Development is managed under the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*. Exempt and Complying development cannot be undertaken on listed heritage items listed under Schedule 5 of an environmental planning instrument. Accordingly, exempt and complying development cannot be undertaken on Drummond House. The relevant sections of the Code are outlined below.

#### 1.16 General requirements for exempt development

(1) *To be exempt development for the purposes of this Policy, the development—*

*(a) must meet the relevant deemed-to-satisfy provisions of the Building Code of Australia, or if there are no such relevant provisions, must be structurally adequate, and*

*(b) must not, if it relates to an existing building, cause the building to contravene the Building Code of Australia, and*

*(b1) must not be carried out on land that is a declared area of outstanding biodiversity value under the Biodiversity Conservation Act 2016 or declared critical habitat under Part 7A of the Fisheries Management Act 1994, and*

*(b2) must not be carried out on land that is, or is part of, a wilderness area (within the meaning of Wilderness Act 1987), and*

*(c) must not be carried out on land that is, or on which there is, an item that is listed on the State Heritage Register under the Heritage Act 1977, or that is subject to an interim heritage order under that Act, and*

(d) must not be carried out on land that is described or otherwise identified on a map specified in Schedule 4.

(1A) Despite subclause (1)(c), if development meets the requirements and standards specified by this Policy and that development—

(a) has been granted an exemption under section 57(2) of the Heritage Act 1977, or

(b) is subject to an exemption under section 57(1A) or (3) of that Act,

the development is exempt development under this Policy.

(1B) If an item listed on the State Heritage Register is not located on, or does not comprise, the whole of the relevant land, subclause (1)(c) applies only to the part of the land that is described and mapped on that register.

(1C) If an item not listed on the State Heritage Register but identified as an item of environmental heritage in an environmental planning instrument does not comprise, or is not located on, the whole of the relevant land, any restriction on carrying out development on the relevant land on which the item is located applies only to the part of the land that is described and mapped on that instrument.

#### 1.17A Requirements for complying development for all environmental planning instruments

(1) To be complying development for the purposes of any environmental planning instrument, the development must not—

(a) be development for which development consent cannot be granted except with the concurrence of a person other than—

(i) the consent authority, or

(ii) the Director-General of the Department of Environment, Climate Change and Water as referred to in section 4.13(3) of the Act, or

(b) be on land that is critical habitat, or

(c) be on land that is, or is part of, a wilderness area (within the meaning of the Wilderness Act 1987), or

(d) be carried out on land that—

(i) comprises an item that is listed on the State Heritage Register under the Heritage Act 1977 or on which such an item is located, or

(ii) is subject to an interim heritage order under that Act or on which is located an item that is so subject, or

(iii) is identified as an item of environmental heritage or a heritage item by an environmental planning instrument or on which is located an item that is so identified, or

(e) except as otherwise provided by this Policy, be on land that is within an environmentally sensitive area.

(2) Despite subclause (1)(d), if development meets the requirements and standards specified by this Policy and that development—

(a) has been granted an exemption under section 57(2) of the Heritage Act 1977, or

(b) is subject to an exemption under section 57(1A) or (3) of that Act,

the development is complying development under this Policy.

(3) If an item listed on the State Heritage Register is not located on, or does not comprise, the whole of the relevant land, subclause (1)(d) applies only to the part of the land that is described and mapped on that register.



(4) If an item not listed on the State Heritage Register but identified as an item of environmental heritage in an environmental planning instrument does not comprise, or is not located on, the whole of the relevant land, subclause (1)(d) applies only to the part of the land that is described and mapped on that instrument.

## 7.2.3. Local Government Policies

### 7.2.3.1. Manly Local Environmental Plan 2013

A Local Environmental Plan (LEP) is the principal legal document for controlling development and guiding planning decisions made by Council. Drummond House is subject to the provisions of the Manly Local Environmental Plan 2013. The LEP came into effect on 5 April 2013. The aims of this plan are outlined as follows:

#### 1.2 Aims of Plan

(1) This Plan aims to make local environmental planning provisions for land in Manly in accordance with the relevant standard environmental planning instrument under section 3.20 of the Act.

(2) The particular aims of this Plan are as follows—

(a) in relation to all land in Manly—

(i) to promote a high standard of urban design that responds to the existing or desired future character of areas, and

(ii) to foster economic, environmental and social welfare so that Manly continues to develop as an accessible, sustainable, prosperous, and safe place to live, work or visit, and

(iii) to ensure full and efficient use of existing social and physical infrastructure and the future provision of services and facilities to meet any increase in demand, and

(iv) to ensure all development appropriately responds to environmental constraints and does not adversely affect the character, amenity or heritage of Manly or its existing permanent residential population,

(b) in relation to residential development—

(i) to provide and maintain a diverse range of housing opportunities and choices that encourages affordable housing to cater for an ageing population, changing demographics and all socio-economic groups, and

(ii) to ensure high quality landscaped areas in the residential environment, and

(iii) to encourage higher density residential development to be located close to major transport nodes, services and employment opportunities, and

(iv) to maintain active retail, business and other non-residential uses at street level while allowing for shop top housing in centres and offices at upper floors in local centres,

(c) in relation to business and the economy—

(i) to encourage, provide and consolidate business opportunities for a range of uses in appropriate locations that support local employment, community services and economic growth in business centres, and

(ii) to recognise that tourism is a major industry and employer in Manly and to encourage its growth and continuing viability while protecting the needs of the local community,

(d) in relation to transport, infrastructure and amenities—

(i) to reduce private car dependency, increase the viability of various public transport modes, minimise conflict between pedestrians and vehicular movement systems and encourage walking and cycling while concentrating

*intensive land uses and trip generating activities in locations most accessible to public transport and centres, and*

*(ii) to provide for a range of recreational and community service opportunities to meet the needs of residents and visitors to Manly and promote the efficient and equitable provisions of public services, infrastructure and amenities,*

*(e) in relation to heritage—to identify, protect, sustain, manage and conserve all heritage, including archaeological relics, sites and resources, places of Aboriginal heritage significance, heritage items (and their curtilages), heritage conservation areas and the cultural (natural and built) environmental heritage of Manly,*

*(f) in relation to the natural environment—*

*(i) to conserve and enhance terrestrial, aquatic and riparian habitats, biodiversity, wildlife habitat corridors, remnant indigenous vegetation, geodiversity and natural watercourses, and*

*(ii) to promote energy conservation, water cycle management (incorporating water conservation, water reuse, catchment management, stormwater pollution control and flood risk management) and water sensitive urban design, and*

*(iii) to protect, enhance and manage environmentally sensitive land with special aesthetic, ecological, scientific, cultural or conservation values for the benefit of present and future generations, and*

*(iv) to protect existing landforms and natural drainage systems and minimise the risk to the community in areas subject to environmental hazards, particularly flooding, bush fires, acid sulfate soils, sea level rise, tsunamis and landslip, and*

*(v) to provide a framework that facilitates and encourages measures to assist the adaptation of the local environment to mitigate the impacts of climate change, and*

*(vi) to give priority to retaining bushland for its own intrinsic value and as a recreational, educational and scientific resource,*

*(g) in relation to Manly's unique harbour, coastal lagoon and ocean beach setting—*

*(i) to preserve and enhance the amenity of public places and areas visible from navigable water around Manly, and*

*(ii) to retain open space, make more foreshore land available for public access and protect, restore and enhance riparian land along watercourses and foreshore bushland.*

Drummond House is listed as a heritage item under Schedule 5 of the Manly LEP 2013. The Manly LEP 2013 requires consent for certain types of development (including development affecting and in the vicinity of heritage items) and the consent authority, in considering any proposed development, must have regard to the relevant aims, strategies and principles contained in this plan. Heritage provisions under the LEP are incorporated under section 5.10 of the instrument.

Clause 5.10 (2) nominates consent required for certain development as outlined below:

*(2) Requirement for consent Development consent is required for any of the following—*

*(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) a heritage item,*

*(ii) an Aboriginal object,*

*(iii) a building, work, relic or tree within a heritage conservation area,*

- (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,*
- (c) *disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,*
- (d) *disturbing or excavating an Aboriginal place of heritage significance,*
- (e) *erecting a building on land—*
  - (i) *on which a heritage item is located or that is within a heritage conservation area, or*
  - (ii) *on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,*
- (f) *subdividing land—*
  - (i) *on which a heritage item is located or that is within a heritage conservation area, or*
  - (ii) *on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.*

Minor change to fabric of little or no heritage significance should be achievable through the application of the pathway provided under Clause 5.10.3(a) of the *Manly Local Environmental Plan 2013*, otherwise known as 'Heritage works without consent'. To qualify for 'consent' through this pathway, the proposed works must be;

- Minor or for the maintenance of the heritage item; **and**
- Have no adverse impact on the significance of the heritage item.

Changes which should be allowed under this pathway may be determined by a heritage consultant and could include:

- Replacement of later fit out elements including carpets/later floor finishes, contemporary lighting, contemporary fixtures, contemporary bathroom and kitchen fit outs.
- Repainting already painted surfaces as long as no significant finishes are painted over.
- Maintenance and conservation works in accordance with a schedule of conservation works or minor maintenance works.

Reference should be made to the full Clause and requirements under the *Manly Local Environmental Plan 2013*.

### **7.2.3.2. Manly Development Control Plan 2013**

A development control plan is a non-statutory document that supports the LEP with more detailed planning and design guidelines. The Manly DCP 2013 applies to the subject site.

The Sydney DCP was adopted by Council on 13 May 2013 and came into effect on 20 May. The DCP incorporates provisions for works to heritage items, development in the vicinity of heritage items, and within special character areas under Part 3 Section 3.2 Heritage Considerations. Other guidelines that apply to the subject site include Part 3 and Part 4 including 4.4.1 *Demolition* and 4.4.3.2 *Signs on Heritage Items and Conservation Areas*.

## 7.3. MANAGEMENT PLANS AND GUIDELINES

This Conservation Management Plan revises the following report:

*Conservation Management Strategy, Royal Far West Manly, prepared by Urbis in May 2011.*

This updated Conservation Management Plan has been prepared in anticipation of major change to the place as part of a broader redevelopment of the Royal Far West facilities in Manly. In accordance with the policy of the former 2011 Conservation Management Strategy (CMS), this revised and updated Conservation Management Plan has been prepared to undertake a review of the significance of the place and prepare conservation policy to guide future change and manage significance in the context of this proposed change. With consideration for the identified significance of the place, and the high level of significance attributed to the intangible charitable institution operations of the site, this document has been prepared to act as a guide for current and future owners and occupiers to help them better understand and manage this significance.

Policy recommendations from the above report have been considered and incorporated in this CMP (refer Section 9) and this report therefore supersedes the policy recommendations of the 2011 report.



# 8. OPPORTUNITIES AND CONSTRAINTS

## 8.1. INTRODUCTION

The conservation planning process established by the *Burra Charter* of Australia ICOMOS guidelines (refer Article 6 which defines the Burra Charter Process) requires that relevant constraints be identified as part of the process for developing conservation policies for places of significance. These constraints include the following considerations:

- Obligations arising from the cultural significance of the place.
- Physical constraints of the place, including environmental factors and the physical condition of the fabric.
- Relevant statutory and non-statutory controls.
- Owners' needs, resources and other external constraints.
- Obligations involved in undertaking research, maintaining records and communicating the heritage values of the place.

The assessment of the following specific constraints and opportunities has informed the development of appropriate policies for the management of Drummond House and its significance.

## 8.2. STATUTORY AND NON-STATUTORY REQUIREMENTS

Approvals for works to the site may be required under the EP&A Act (including the Manly LEP 2013), the Heritage Act and/ or the National Parks and Wildlife (NP&W) Act as outlined above in Section 7. This section should be referred to prior to undertaking any works.

Where new works are proposed, compliance with the Building Code of Australia / National Construction Code and Australian Standard AS1428 (Universal Access) may also be required as outlined in Section 7. Any strategies or solutions to ensure that components of the subject building comply with the BCA/ NCC or AS1428 should be driven by the cultural significance of the place. Where necessary, alternative solutions and performance based outcomes should be pursued to ensure the intent of the code is met without adversely impacting on significant fabric.

To minimise adverse interventions and to assist in maximising the exposure of significant heritage fabric, where relevant, alternate solutions to the deemed to satisfy provisions of the BCA should be derived from performance based assessments particularly in relation to structural provisions, fire resistance and stability, fire separation, provisions for access and egress, sound transmission and isolation, and energy efficiency.

Professional advice should always be obtained and a heritage consultant should be involved from design development in all proposals for major change.

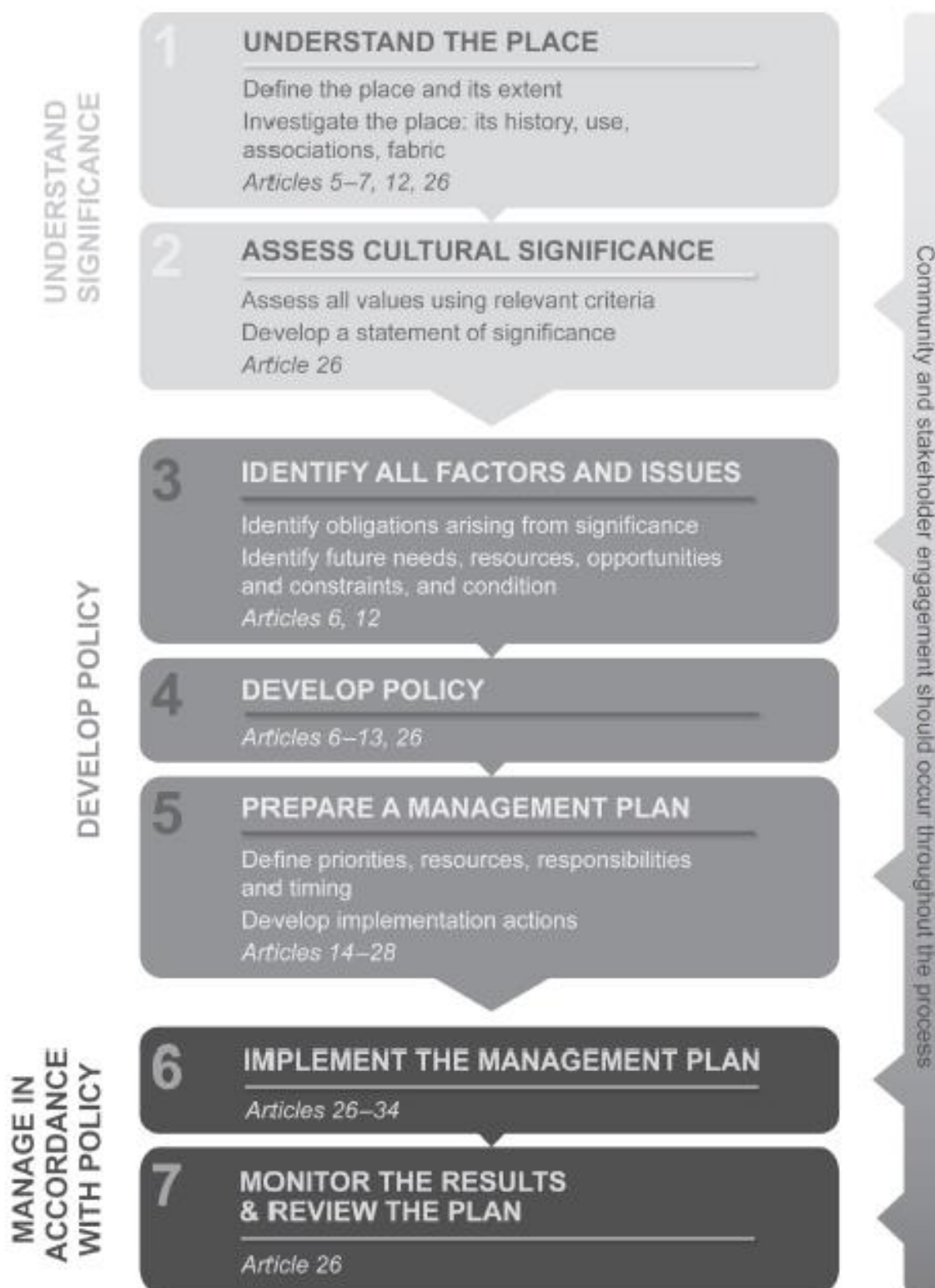
## 8.3. THE BURRA CHARTER

The *ICOMOS Burra Charter 2013* adopted by Australia ICOMOS, establishes the nationally accepted principles for the conservation of places of cultural significance. Although the *Burra Charter* is not cited formally in an Act, it is nationally recognised as a document that shapes the policies of the Heritage Council of NSW. The document provides the underlying methodology by which works to heritage items of all levels of significance are undertaken and provides the guidelines for the management of heritage items. The subject building is of demonstrated cultural significance, and therefore, procedures for managing changes and activities at the site should be in accordance with the recognised conservation methodology of The Burra Charter.

A copy of the Burra Charter is available via the following link: <http://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf>.

The philosophy as set out by the Burra Charter for managing significance is outlined overleaf.

Figure 34 – The Burra Charter Process (flow chart showing the steps in planning for and managing a place of cultural significance, with Key articles relevant to each step shown in the boxes)



Source: *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013.*

## **8.4. MANAGEMENT OF HERITAGE SIGNIFICANCE**

This CMP provides an analysis of the significance of Drummond House in its present form. It has been determined that the building is of heritage significance as an example of the Inter-War Stripped Classical style and for its long-running use as a charitable institution.

This places an obligation for owners, occupiers and users of the building and any other stakeholders responsible for or involved in the maintenance and management of the building to conserve this identified significance. This includes internal and external fabric, individual spaces, elements and structures of the building as identified in Section 5.

Any future proposed changes to the buildings must be undertaken in accordance with the Manly LEP 2013 and Manly DCP 2013, the Burra Charter and with reference to the policy recommendations of this CMP. The significance of the site is summarised above in Section 6.

General constraints in relation to the elements, fabric and spaces of heritage significance and setting include:

- Future uses and changes to the place should support and facilitate the highly significant and long-running charitable institutional use of the place.
- Retain those aspects of the original configuration and fabric of the building which provide a defining contribution to the significance of the place (refer to the schedule of significant elements and the policies herein).
- Future proposed works should aim to regain and interpret “lost” elements of the building which were once important contributors to its architectural design, amenity and significance. This could include the exposure of original face brick work or reinstatement of original principal elevation features and landscaping.
- Elements intrusive to the significance of the building, its interiors and to the setting should be removed concurrent with any major conservation works programme, proposed major alterations and/ or additions, or adaptive reuse.
- Refer to Section 9: Conservation Policies, for all policies regarding management of heritage significance of the building.

## **8.5. CONDITION AND INTEGRITY OF FABRIC AND PHYSICAL EVIDENCE**

This CMP provides an analysis of the condition of Drummond House in its present state. It has been determined that in general terms; the fabric of the building is in good functional condition however the overall integrity of the building is poor. The original form of the building has been lost with the later addition of the third level, and many original architectural features such as the face brick work have been obscured. Internally, the building has been adapted over the years to meet the changing needs of the Royal Far West charitable institution to provide the best facilities available for children in need.

As discussed elsewhere in this CMP, 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.

Future works to the place should seek to recapture missing early architectural elements and features which would assist in the understanding of the place as an Inter-War Stripped Classical building. Works to spaces and fabric which do not provide a defining contribution are permissible if they are for the support and facilitation of the continuation of the charitable institutional use of the place.

Refer to Section 9: Conservation Policies for policies regarding the conservation of the building fabric.

## 8.6. OWNER'S REQUIREMENTS

A previous master planning application was approved in 2013 under the Concept Plan Application (Former Part 3A) for Mixed Use Development at 14-22 Wentworth Street and 16 and 19-21 South Steyne, Manly (MP10\_0159). This application was for the redevelopment of the adjoining Royal Far West sites in Manly.

The owner, Royal Far West, is now seeking to amend this approval and undertake major works to the subject Drummond House and the adjoining buildings to completely upgrade the facilities they manage with a holistic approach. Over time, the needs and demands of operating Royal Far West as a charitable institution for the care of children in need and their families has evolved to the point where the existing facilities no longer provide the security or amenity required for this important and historic use. Royal Far West have advised that the existing building and spaces are not fit for purpose.

Adaptive reuse options of the existing spaces within Drummond House have been explored in the first instance to review the opportunity of fabric retention holistically. This approach was not deemed possible by Royal Far West given the ad-hoc development and configuration of the spaces, which do not provide appropriate modern facilities or equitable access. The later additions and modifications to the place have resulted in a warren-like internal spatial configuration which does not meet the requirements of the charity or the services they are providing to families in need.

Given the relatively high significance of the place for its historic and long-running charitable institutional use in comparison to the compromised significance of the existing fabric, the most appropriate approach has been to adopt a holistic plan of redevelopment across all of the Royal Far West site, including Drummond House. The principal elements of Drummond House which make a defining contribution to its significance are being retained and conserved, while opportunities for expansion and upgraded facilities to the rear will be provided to allow this historic use to continue.

The conservation policies herein have taken the owner's requirements into consideration to ensure the appropriate management of the significance of the place in the context of the proposed change.

The following discussion regarding the use and requirements of the building have been outlined by Royal Far West:

*Royal Far West is a 95-year old charity based in Manly that is dedicated to improving health outcomes for children in rural and remote communities. We provide integrated health, education, and disability services for children with developmental vulnerability and disability, together with capacity building and support for families, schools, and health professionals. These services and supports are provided at our Centre for Country Kids in Manly, using technology (telehealth) and through community outreach programs.*

*Our Manly location is central to the model and is where we provide our most complex children and families with specialist services, support, and respite. Our large, multi-disciplinary team of 90+ clinicians works with the Royal Far West School (part of the NSW Department of Education) to support children and their parents/carers in the Centre for Country Kids. Families are accommodated onsite in our Drummond House guesthouse.*

*Developmental vulnerability and the need for associated services and supports, is increasing across rural and remote communities. In particular, mental health and behavioural issues are rising, due to factors such as drought, bushfires and COVID-19. This has been reflected in year on year growth in the number of families seeking services from Royal Far West. The number of children we work with has tripled over the last decade, and this year, we will support close to 10,000 people through our programs.*

*Building the new Centre of Country for Kids has been critical in enabling Royal Far West to respond to increasing demand, and to provide services in a more contemporary way, thereby enhancing the experience of our families and staff. However, the building is already close to capacity and is short on contemporary therapy spaces, consultation rooms, school rooms and appropriate meeting spaces.*

*In addition, our traditional Drummond House guesthouse, which is adjacent to the Centre for Country Kids, is outdated and no longer 'fit for purpose'. The bedrooms, dining areas, communal and play areas – essentially all aspects of the existing guesthouse – no longer meet the needs of our families with complex health, psychological and emotional needs. The available play areas are small and are not purpose built, which makes it challenging for children to play safely regulate themselves and for parents/carers and/or staff to supervise.*

*The dining area is dark and extremely noisy. Many families struggle to manage at eating times, especially where children have specific needs (for example, children with autism). The bedroom and bathrooms have*



*very little natural light, are poorly ventilated, overlook each other and are space inefficient. The single lift regularly breaks down and is not large enough to fit a stretcher. The mechanical infrastructure overall is basic and inefficient from any energy perspective.*

*Due to the way the building is configured, there is very little opportunity for passive surveillance of children by parents/carers or staff, which is critical in monitoring behaviour and anxiety levels and managing specific risks like 'climbers', 'runners' or 'jumpers', which are common amongst our clients. This makes the building most inefficient from an operational and staffing perspective. Finally, the fit-out of the building is very old and the whole guesthouse needs refurbishing, alongside addressing these fundamental layout issues.*

*The health and well-being campus that Royal Far West is proposing is vital to delivering on our mission and strategy, reaching more rural and children and families with integrated services that significantly improve health and well-being outcomes in an environment that is safe, welcoming and easy to navigate.*

## **8.7. CURRENT AND FUTURE USES**

Drummond House is owned and occupied by Royal Far West, a non-profit charitable organisation which has been operating from the site for over 95 years. The Royal Far West provides services to enhance the health and wellbeing of children who normally reside in country and regional areas. The services include the provision of clinical, educational, and secure and safe accommodation services for the treatment and security of these children in need and their families.

This historic charitable organisational use has been identified to be the primary significance of the Drummond House property and should be retained and conserved. It should be the preferred outcome of any future works that this use is maintained, enhanced and protected. Adaptive reuse of spaces and fabric, modification of fabric and additions are all acceptable means of facilitating this ongoing use, subject to heritage assessment.

# 9. CONSERVATION POLICIES

## 9.1. WHAT IS A CONSERVATION POLICY?

A conservation policy explains the principles to be followed to retain or reveal the heritage significance of a place, and how that significance can be maintained and enhanced. This relies on a full understanding of the significance of the place and a review of the constraints and opportunities arising out of that significance.

The below policies and guidelines are informed by background discussion in this CMP which explains the reasoning behind the policy. It is noted that not all of the guidelines and/ or policy may be achievable when external matters are taken into account such as condition or owner's requirements (within reason).

## 9.2. DEFINITIONS

The below table outlined the definitions of terms used throughout the conservation policy section.

Table 9 – Definitions of terms

Term	Definition
Archaeological assessment	A study undertaken to establish the archaeological significance (research potential) of a particular site and to identify appropriate management actions
Archaeological potential	The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research
Archaeology	The study of past human cultures, behaviours and activities through the recording and excavation of archaeological sites and the analysis of physical evidence
Australia ICOMOS	The national committee of the International Council on Monuments and Sites
Burra Charter	Charter adopted by Australia ICOMOS, which establishes the nationally accepted principles for the conservation of places of cultural significance; Although the <i>Burra Charter</i> is not cited formally in an Act, it is nationally recognised as a document that shapes the policies of the Heritage Council of NSW
Conservation	All the processes of looking after an item so as to retain its cultural significance; it includes maintenance and may, according to circumstances, include preservation, restoration, reconstruction and adaptation, and will be commonly a combination of more than one of these
Conservation Management Plan	A document explaining the significance of a heritage item, including a heritage conservation area, and proposing policies to retain that significance; it can include guidelines for additional development or maintenance of the place
Conservation policy	A proposal to conserve a heritage item arising out of the opportunities and constraints presented by the statement of heritage significance and other considerations
Context	The specific character, quality, physical, historical and social characteristics of a building's setting; depending on the nature of the proposal, the context could be as small as a road or entire suburb
Curtilage	The geographical area that provides the physical context for an item, and which contributes to its heritage significance; land title boundaries do not necessarily coincide
Heritage item	A landscape, place, building, structure, relic or other work of heritage significance
Heritage significance	Of aesthetic, historic, scientific, cultural, social, archaeological, natural or aesthetic value for past, present or future generations
Integrity	A heritage item is said to have integrity if its assessment and statement of significance is supported by sound research and analysis, and its fabric and curtilage and still largely intact

<b>Term</b>	<b>Definition</b>
Interpretation	Interpretation explains the heritage significance of a place to the users and the community; the need to interpret heritage significance is likely to drive the design of new elements and the layout or planning of the place
Maintenance	Continuous protective care of the fabric and setting of a place; to be distinguished from repair; repair involves restoration or reconstruction
Setting	The area around a heritage place or item that contributes to its heritage significance, which may include views to and from the heritage item; the listing boundary or curtilage of a heritage place does not always include the whole of its setting
Use	Means the functions of a place, as well, as the activities and the practices that may occur at the place; a compatible use respects the cultural significance of a place

### 9.3. ADOPTION AND REVIEW

Various state legislation applies to the management of Drummond House. The subject site is listed as a local heritage item on Schedule 5 of the Manly Local Environment Plan 2013. Approvals are required for works to the heritage item and exemptions may be applicable for maintenance or minor works (with notifications and approval required in writing). Approvals may also be required for works in the vicinity of the item.

Any works to the property should comply with appropriate legislation, policies and guidelines, as amended from time to time, including but not limited to the Building Code of Australia, the Australia ICOMOS Burra Charter 2013 and relevant LEP and DCP documentation.

- Policy 1. This CMP should be adopted by present and future owners and users as a guide for the ongoing management and conservation of the place.
- Policy 2. A copy of this CMP should be retained on site at all times for use by those responsible for the management and conservation of the place.
- Policy 3. A copy of the CMP should be submitted to the Northern Beaches Council and the NSW Heritage State Heritage Inventory for archival and research purposes.
- Policy 4. This CMP should be submitted to the Northern Beaches Council as part of any application for new works. Where appropriate or requested, it should be accompanied by a heritage impact statement that assesses the specific impacts of the proposal against relevant legislation and policies in this CMP.
- Policy 5. This CMP should be reviewed and updated within the next 5- 10 years if applicable or in conjunction with any major works to the site, to remain relevant to ongoing change and use of the place, and statutory compliance.

### 9.4. MANAGEMENT OF HERITAGE SIGNIFICANCE

Article 3 of The Burra Charter indicates that conservation is based on a respect for the existing fabric of a place and should therefore involve the least possible physical intervention in order not to distort the evidence provided by the fabric. One of the key objectives therefore, of contemporary conservation practice is to retain as much of the **significant** original fabric as possible, in order to preserve the essential integrity of the heritage resource.

It has been determined that the building is of heritage significance as an example of the Inter-War Stripped Classical style and for its long-running use as a charitable institution.

The fabric of the building is in good functional condition however the overall integrity of the building is poor. The original form of the building has been lost with the later addition of the third level, and many original architectural features such as the face brick work have been obscured. Internally, the building has been adapted over the years to meet the changing needs of the Royal Far West charitable institution to provide the best facilities available for children in need.

As discussed elsewhere in this CMP, 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.

Various built components contribute in different ways to the overall significance of the building and the degree of change considered appropriate is dependent on its assessed level and grading of significance. Elements with a higher grade of significance will have greater constraints on change.

The Statement of significance embodies the core heritage values of the buildings and all future decisions and works to the buildings must be guided by the statement of significance and the identified significant spaces, fabric and building elements identified in this CMP together with any additional detailed research and assessment.

Owners, occupiers and stakeholders responsible for and involved in the maintenance and management of the building should be aware of the identified significance and aim to conserve and enhance this significance as well as identified significant internal and external fabric and spaces.



Works should be undertaken in accordance with the principles of the Australia ICOMOS Burra Charter.

Policy 6. Elements of **exceptional significance** are rare or outstanding elements that directly contribute to the place's overall heritage significance. They demonstrate a key aspect of the place's overall heritage significance and should be retained and conserved in-situ. Any change should be minimal and retain significant values or fabric.

Elements of **high significance** have a high degree of original fabric; they demonstrate a key aspect of the place's overall heritage significance and should be retained and conserved; retention should be considered in-situ; minor change is allowed so long as significant values and fabric are retained and conserved.

Elements of **moderate significance** have been altered or modified or do not demonstrate a key aspect of the significance of the place; they contribute to the place's overall heritage significance however change is allowed so long as it does not adversely affect values and fabric of exceptional or high significance.

Elements of **little significance** do not substantially add to the significance of the place in a positive way, though neither do they detract from its overall significance. Elements of little significance may also reflect fabric that may have been substantially altered or modified or may reflect non-significant phases of development. Changes are allowed so long as it does not adversely affect values and fabric of exceptional or high significance.

Elements identified as **neutral** do not contribute or detract from significance. The attribution of 'neutral' typically applies to introduced new or utilitarian fabric that does not relate to a significant historical period or use. Changes are allowed so long as they do not impact on associated fabric of higher significance.

**Intrusive** elements are damaging to the place's overall heritage significance; they should be considered for removal or alteration;

Policy 7. All future decisions and works to the building must be guided by the statement of significance and the significant spaces, fabric and building elements identified in this CMP together with any additional detailed research and assessment.

Policy 8. All contractors, consultants and project managers engaged to work on the building should have appropriate conservation skills, experience and techniques appropriate to the trade, fabric or services.

Policy 9. The future conservation and development of the place should be carried out in accordance with the principles of the Burra Charter. The Burra Charter advocates a cautious approach to change: *do as much as necessary to care for the place and to make it useable, but otherwise change it as little as possible so that its cultural significance is retained.*

Policy 10. Any significant elements proposed for demolition or removal should be subject to archival photographic recording, copies of which should be retained on site and provided to the consent authorities (Northern Beaches Council). This should include photography and/ or measured drawings. Archival recording should be undertaken in accordance with the Heritage Council of NSW Guidelines for Photographic Recording of Heritage Items Using Film or Digital Capture, or How to Prepare Archival Records of Heritage Items.

## 9.5. CONSERVATION AND MAINTENANCE

Drummond House requires regular maintenance and upgrade works to conserve its heritage significance and identified significant fabric. Change should also be considered with a goal to conserve and enhance the identified heritage values of the asset, wherever possible, while accommodating its continued use.

Management and maintenance of the asset should aim to conserve its heritage significance. Works should be sympathetic to highly significant fabric and repairs should be undertaken over replacement, if possible.

Maintenance works to Drummond House should be undertaken on a regular basis to avoid substantive conservation works.

Any repair, conservation or reconstruction works to significant elements or facades should be undertaken with appropriate supervision by a suitably qualified heritage consultant /architect and/ or relevant materials specialist/s or conservator.

Policy 11. A schedule of maintenance works should be prepared by a suitably qualified heritage consultant / conservation architect.

Policy 12. The significant fabric of the building should be maintained by the implementation of a cyclical maintenance program. As a necessary minimum, the ongoing maintenance should include works that will ensure that each element retains its current level of significance and not allow the loss of significance due to the deterioration of fabric.

## 9.6. USE

Drummond House is owned and occupied by Royal Far West, a non-profit charitable organisation which has been operating from the site for over 95 years. The Royal Far West provides services to enhance the health and wellbeing of children who normally reside in country and regional areas. The services include the provision of clinical, educational, and secure and safe accommodation services for the treatment and security of these children in need and their families.

This historic charitable organisational use has been identified to be the primary significance of the Drummond House property and should be retained and conserved. It should be the preferred outcome of any future works that this use is maintained, enhanced and protected. Adaptive reuse of spaces and fabric, modification of fabric and additions are all acceptable means of facilitating this ongoing use, subject to heritage assessment.

- Policy 13. Any proposed use of Drummond House should be compatible with the nature and significance of the building.
- 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.
- Policy 15. Ancillary and supporting uses are appropriate if they facilitate the primary charitable use of the building.
- 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.
- 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.

## 9.7. MANAGING CHANGE: ALTERATIONS, ADAPTATION AND NEW WORKS

Any proposed modifications to the heritage item must take into consideration the identified significance and must have regard for the total resource. New works should ensure that the primary aspects of the significance of the place is protected.

### 9.7.1. Managing Change: Basis of Approach

Articles 15, 22 and 27 of the Burra Charter establish the principles and processes for managing significance in the event of change and new work. The impact of proposed changes including incremental changes should be assessed with reference to the statement of significance and policy for managing change. Existing fabric, use, associations and meanings should be adequately recorded prior to making any change. New work should respect and enhance significance, rather than distort or obscure significance. Changes which reduce significance should be reversible. Articles 16 to 21 inclusive establish the conservation processes to significant fabric and spaces, whether it is maintenance, preservation, restoration, reconstruction or adaptation.

Any major works to the building, particularly to the interiors and rear of the building, should be based upon the investigation and analysis in this CMP.

- Policy 18. The future conservation and development of the place should have regard for the principles of the Australia ICOMOS Burra Charter (The Burra Charter).
- Policy 19. While recognising the need for change, the approach to the building fabric should be a realistic and practical approach, one of minimal intervention to key areas and elements of significance but flexibility in areas of lesser significance – changing as much as necessary, but as little as possible.
- Policy 20. The results of any further analysis and all new evidence uncovered during works to the place should be recorded to provide an on-going resource for reconstruction, repair and maintenance, and added to the existing archive on the place or incorporated into a report or addendum to this Conservation Management Plan, as appropriate.
- Policy 21. Reconstruction is appropriate only where there is sufficient evidence to reproduce an earlier state of the fabric. Reconstruction should be identifiable on close inspection or through additional interpretation.

### 9.7.2. Exterior Elements and Fabric

Section 6.5 of this report set out the levels of significance of the exterior elements and fabric that should form the basis of the approach for all works. The original form and fabric of the building has been substantially altered over time. Originally, the building was only two levels with a flat roof and exposed face brickwork detailing. Over time a third level was added, changing the overall building scale and adding a new hipped roof form. The external elements were modified over time with face brick work being painted and the original setting altered through landscaping and later alterations.

Proposed alterations should consider the relative significance of the existing building and elements, and the primary aspect of the significance of the place being the ongoing historic use as a charitable institution. The winged form of the original building provides a difficult floor plate for the effective use of the building. While the winged form is a distinctive part of the original design, changes in requirements for the care and protection of children over time has meant that internally significant changes have been made to accommodate the current use. This winged layout is not fit for purpose for the current and significant historical use. Future change should retain an understanding of this winged form however retention of the floor plate in the current form is not considered necessary for the protection of the significance of the place.

Proposed alterations should also consider the potential heritage impact upon adjacent heritage items in the vicinity, and the general streetscape.

- 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.



- Policy 23. The front principal wing form of Drummond House over all three levels should be retained and conserved.
- Policy 24. There should be no modifications to the fenestration of the front principal wings form and no new openings.
- Policy 25. No vertical additions are permissible above the front principal wing form of Drummond House.
- 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.
- 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.
- 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 House must be retained and meaningfully integrated into new development.
- 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.
- Policy 30. New additions should respect the history of the original Morrow & Gordon Drummond House by being equal in terms of architecture and quality.
- 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.
- Policy 32. Any required roof plant should be minimal and located to minimise visual impacts. Any works should not adversely impact on significant views.
- 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.
- 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.
- Policy 35. External signage on the original building form should be minimal and limited to fixed plaque signage fixed into mortar joints only.
- Policy 36. External lighting should be minimal and sympathetic to the heritage character of the place.
- Policy 37. New services should not be attached to the significant facades of the building.

### 9.7.3. Interior Elements and Spaces

Section 6.5 of this report provides a schedule of significant interior elements and fabric that should form the basis of approach for all works.

Internally, the building has undergone substantial change over time with modifications internally to spatial configuration and upgrading access and services in line with changing needs associated with the care and security of children in need for the Royal Far West charity.

- 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.

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.

#### Building Code of Australia

In any major upgrade of the building, new works will need to comply with the BCA/ NCC and Australian Standards under Section 94 of the *Environmental Planning and Assessment Regulations 2000*. To minimise adverse interventions and to assist in maximising the exposure of significant heritage fabric, alternate solutions to the deemed to satisfy provisions of the BCA should be derived from performance based assessments particularly in relation to structural provisions, fire resistance and stability, fire separation, provisions for access and egress, sound transmission and isolation, and energy efficiency. Professional advice should always be obtained.

- Policy 40. Required initiatives to meet the requirements of the National Construction Code (including the Building Code of Australia and the Plumbing Code of Australia) and other codes and standards must be carefully designed to avoid unacceptable adverse heritage impacts.
- Policy 41. Future adaptations and upgrades of Drummond House must aim to meet the requirements of the National Construction Code, particularly in regard to protection against fire. Where there is a conflict between the National Construction Code and the heritage significance of the building, alternative options to achieve compliance should be investigated, including performance fire engineered solutions. However if it can be demonstrated that the alteration is absolutely essential then such alteration must be made in accordance with the policies in this Conservation Management Plan.
- Policy 42. If original or early architectural elements have to be removed or concealed in order to achieve code compliance, then the appropriate approach should be one of “reversibility” and the minimisation of damage.
- Policy 43. A strategy should be developed which seeks to address Code compliance from a whole of building perspective to avoid piecemeal solutions that may have an incremental adverse heritage impact.
- Policy 44. The reticulation of services should be designed and managed so as to minimise their impact on original internal areas and not obscure significant elements.

## 9.8. ARCHAEOLOGY

### 9.8.1. Aboriginal Archaeology

Section 4.1 of this report outlines the potential Aboriginal cultural heritage values of the place and investigations undertaken to inform this analysis. Based on the research undertaken by MDCA (2011) it is considered that the subject site represents a moderate to highly culturally significant portion of the wider cultural landscape for Aboriginal people in association to pre-contact utilisation of the subject area, contact period usage and the Royal Far West Scheme itself.

The assessment by MDCA (2011) and the high level Aboriginal archaeological overview produced for this CMP (Urbis 2020) determined that Aboriginal objects have been identified in proximity to the subject site as well as within the Narrabeen and Woy Woy Soil Landscapes. There is moderate potential for subsurface archaeological material to remain within the subject site associated with pre-colonisation Aboriginal use of the subject area. Additionally, historical records indicate Aboriginal campsites in the vicinity of the subject site following colonisation indicates that there exists potential for contact archaeological deposits associated with this period of use. There is an enduring cultural significance between the Aboriginal community and the subject site through the RFW Scheme.

- Policy 45. An Aboriginal Cultural Heritage Assessment should be prepared in consultation with the relevant Aboriginal stakeholders and in compliance with the relevant guidelines under the *National Parks and Wildlife Act 1974*. As part of the Aboriginal Cultural Heritage Assessment, it may be deemed necessary to obtain an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the *National Parks and Wildlife Act 1974* prior to undertaking works to the site.
- Policy 46. Prior to undertaking any subsurface excavation as part of future works within the subject site, geotechnical analysis should be undertaken to ascertain the presence or absence of natural soils, particularly the Narrabeen and Woy Woy Soil Landscapes.

### 9.8.2. Historical Archaeology

Section 4.2 of this report outlines the high-level analysis of historical archaeological potential of the subject area. Whilst the level of disturbance to the subject area following the construction of Drummond House is unknown, it is considered that there is low to moderate potential that the archaeological remains of Sandhurst and associated deposits/outbuildings will be present within the subject site.

A significance assessment has not been undertaken as part of this CMP, nor does this high-level assessment constitute an Historical Archaeological Assessment (HAA).

- Policy 47. An Historical Archaeological Assessment (HAA) should be prepared by a suitably qualified historical archaeologist in accordance with the Heritage Council of NSW Guidelines 'Assessing Significance for Historical Archaeological Sites and Relics' 2009 and 'Archaeological Assessments' 1996. This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential resource. Test excavation may be appropriate depending on the results of the HAA.

## 9.9. CURTILAGE, SETTING AND VIEWS

The building plays a role in the appreciation of the historic streetscape and townscape values within the immediate precinct. The site has operated as the Royal Far West institution for over 90 years and this streetscape presence should be maintained and celebrated.

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.

## 9.10. INTERPRETATION

Interpretation should be consistent with the NSW Heritage Manual, the NSW Heritage Office Interpreting Heritage Places and Items: Guidelines (August 2005) and the NSW Heritage Council's Heritage Interpretation Policy (endorsed August 2005).

Policy 50. An interpretation strategy should be implemented as part of any major phase of works.

Policy 51. The primary significance of the place being the ongoing and historically significant Royal Far West charitable institution should be the focus of new interpretation.

Policy 52. The highest form of interpretation is the retention and conservation of significant fabric, spaces and relationships and accordingly significant elements as identified herein and in accordance with this CMP policy should be retained, exposed and interpreted.

Policy 53. The ongoing interpretation of the place should be considered strategically, with consideration for future uses, ongoing maintenance of extant and proposed interpretive media, public access and amenity issues and ordinance compliance.

## 9.11. IMPLEMENTATION STRATEGIES

The following table lists strategies for implementing the conservation policies for Drummond House. The strategies have been cross-referenced to conservation policies above and prioritised as follows. Please note that the below timeframes have been provided as a **guideline only** to assist in scheduling, and may be subject to change dependant on the construction program of the owner and future tenants of the building, or subject to further investigations.

- high priority works should be undertaken within the next two to four years;
- medium priority works should be undertaken within the next four to six years, and
- low priority works should be undertaken within the next six years.

Table 10 – Implementation Strategies for Conservation Policies

Conservation Policy	Priority
Policy 1 This CMP should be adopted by present and future owners and users as a guide for the ongoing management and conservation of the place.	Upon finalisation
Policy 11 A schedule of maintenance works should be prepared by a suitably qualified heritage consultant / conservation architect.	High/ in conjunction with future development proposals
Policy 50 An interpretation strategy should be implemented as part of any major phase of works.	High/ in conjunction with future development proposals



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