

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

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Royal Far West
c/o Lighthouse Project Group
Suite 201, Level 2
56 Berry Street
North Sydney NSW 2060

To whom it may concern,

HERITAGE LETTER - ROYAL FAR WEST (\$75W MODIFICATION TO PART 3A CONCEPT APPROVAL MP10_0159): SDRP/GOVERNMENT ARCHITECT COMMENTS

1. BACKGROUND

This letter has been prepared in response to the comments received following the State Design Review Panel (SDRP) meeting on 29 April 2021, in relation to the modification application for a mixed use development at Royal Far West at 14-22 Wentworth Street and 12-21 South Steyne, Manly.

The Stage 1 Concept Plan MP10_0159 was granted subject to conditions by the Planning Assessment Commission of New South Wales (PAC) as a delegate of the Minister for Planning and Infrastructure on 18 April 2013. The Concept plan approval includes:

- Use of the site for a mixed use development with associated hospital facility, "Centre for Excellence";
- Indicative building envelopes for buildings;
- Tourist and visitor accommodation, residential, retail/commercial and hospital/medical uses to a maximum FSR of 3:1;
- Basement car parking for 184 car spaces; and
- Landscaping area throughout the site.

2. HERITAGE CONTEXT

The Stage 2 site area contains one heritage item – The Drummond Far West Home at 22 Wentworth Street, Manly. This property is listed as an item of environmental heritage (Item 245) under Schedule 5 of the *Manly Local Environmental Plan 2013*. For the purpose of this response letter, we have outlined the identified significance of the Drummond Far West Home heritage item below. It is important to acknowledge the identified heritage values of the place are twofold, being;

- Significance at the State level for its role as a charitable institution; and
- Significance at the local level as an example of an Inter-War Classical style building – noting that the building’s principal façade makes the defining contribution to this aspect of the building’s significance. It is noted that the building is substantially altered from its original design as a result of the third storey constructed in 1945, the painting of the building’s face brick and extensive internal modifications over time typical of similar institutions.

The existing statement of significance for the place as identified on the NSW State Heritage Inventory is as follows:

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.¹

The heritage context of the Drummond Far West Home is shown in the following heritage map extract.



Figure 1 Extract of heritage map showing Drummond House outlined in blue and the broader Royal Far West site in yellow

Source: NSW Planning Portal 2021

3. RESPONSES TO SDRP HERITAGE COMMENTS

The SDRP at the meeting of 29 April 2021, provided the following heritage related comments for consideration and response.

¹ NSW SHI, Drummond House, <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=2020103>

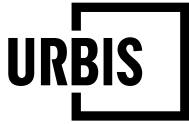
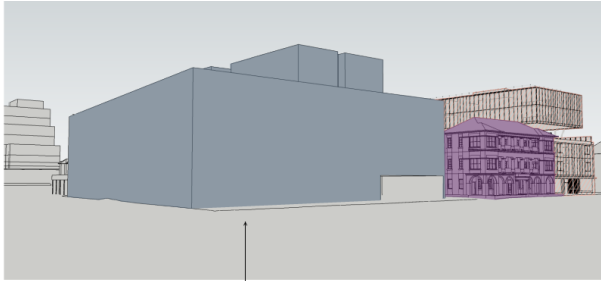


Table 1 Heritage Responses to SDRP Feedback

SDRP Comment	Response
<p>It is understood the adaption of the Drummond House heritage item would lead to unsatisfactory compromises for the RFW accommodation. This determination should be demonstrated via expert advice you have received. While partial demolition of the heritage item is supported in principle, the rationale for demolition should be justified in response to the heritage policy and the Urbis Heritage Conversation Management Plan.</p>	<p>Urbis’s Heritage Impact Statement for the project, dated 22 July 2021 provides a comprehensive assessment of the proposal against heritage related planning provisions of the <i>Manly Local Environmental Plan 2013</i>, <i>Manly Development Control Plan 2013</i>, the <i>Heritage NSW Guidelines for Assessing Heritage Impact</i>, and the <i>Urbis Conservation Management Plan (2020)</i>. Overall this assessment concludes that the potential impact of the partial demolition of Drummond House has an acceptable heritage impact for the following reasons:</p> <ul style="list-style-type: none"> ▪ Drummond House is a highly modified inter-war building which has been subject to numerous rounds of major changes over the years. The original form and fabric of the building is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations. ▪ The proposed demolition of the rear wings of Drummond House is limited to the removal of fabric of secondary importance when compared with the front block and principal elevation, which is generally the only area of the building that makes a defining contribution to the Inter-War Classical style design of the place (albeit, also highly modified). The rear wings of Drummond House, proposed for removal are not required to be retained in order to understand and appreciate the identified heritage significance of the place, being its state-significant function as an on-going charitable institution and its representative value as an Inter-War Classical style building, evidenced by the principal elevation. ▪ The revised CMP grades this rear wing fabric as having ‘Moderate Significance’ only, and as such the removal of this fabric will not affect any fabric of Exceptional or High heritage significance. ▪ Further the proposed new rear additions to Drummond House have adopted a rhythmic wing form that interprets the wing form of the fabric proposed for demolition. This approach allows for an understanding of and sympathetic response to the original design and form of the building

SDRP Comment	Response
	<p>while still being able to facilitate reasonable on-going use while retaining the highly significant front portion of Drummond House.</p> <ul style="list-style-type: none"> ▪ We have been assured that the current buildings are not fit for use. The proposal has been developed by the architects to provide for a particular and highly sensitive use which includes the protection of vulnerable children. The proposal provides for an internal courtyard space for children to safely play in, and this design is only achievable on the site through the removal of the rear wings of Drummond House. The provision of these facilities is critical to the continued operation of Royal Far West as a place of respite and security. As the primary heritage significance of the place is vested in its state-significant long term operation as a charitable institution, the proposal is considered acceptable and appropriate from a heritage perspective as it safeguards these operations, allowing them to continue into the future and adapt as required to meet the evolving demands of this important institution. ▪ The potential impact of the removal of the rear wing fabric of this heritage item is substantially outweighed by the longer term benefit to the operations of Royal Far West and the protection of the state-significance of this place as a long running charitable institution. <p>Please refer to the Urbis Heritage Impact Statement (2021) for a full and detailed impact assessment of the demolition works.</p>
<p>The podium setback and the 6m lower level setback from Wentworth Street, as per the previous concept plan, have been removed in the modified concept plan. The proposed eight-storey building with no setback alters the scale of the development from the street and results in the following challenges that should be addressed as part of design development:</p> <ul style="list-style-type: none"> - the previous massing and setback referenced the height of Drummond House. The 	<p>The revised proposed plans as dated 14 July 2021 (Revision B) and extracts of included hereunder demonstrate the changes in the proposed concept plan in response to the SDRP comments, including a greater setback applied to Wentworth St for the two eastern buildings (Buildings C &D) – resulting in a slightly reduced setback to the terraces in the south.</p> <p>The form of the revised proposed building to the immediate east of Drummond House has employed a setback of 6-metres from Wentworth Street for the western half of this new building’s northern frontage. The revised design also incorporates a splay corner to Drummond House over the ground, first and second levels, providing further physical separation from the Drummond House item and responding to the datum of the heritage item.</p> <p>The eastern half of the new building’s northern frontage has an angled north-east projection which <i>marginally</i> encroaches on the 6-metre setback from Wentworth Avenue, but is necessary to achieve the floor space required to make this development feasible. This building has been set further back in</p>

SDRP Comment	Response
<p>current proposal dominates Drummond House and further design development is required, which could include exploration of new setbacks to ensure the existing heritage item is respected.</p> <p>- the massing of the current proposal could impact the views of neighbouring residential properties. Further investigation is required to illustrate any impacts to views as a result of the modified concept plan.</p>	<p>response to SDRP feedback. Given the above setback measures that have been employed directly adjacent to Drummond House to minimise physical and visual impacts, and with consideration for the significance of ensuring the Royal Far West organisation continues to provide support and relief for disadvantaged children, we are comfortable that the revised design will have an acceptable heritage impact regarding setbacks.</p> <p>Further analysis has been undertaken to compare the approved Part 3A envelope with the revised design to consider all aspects of physical and visual impacts. Notwithstanding that the revised design provides a development which in some areas is larger in scale than the previous envelope, the revised design has been prepared to consider all aspects of the operation requirements of the organisation, and to ensure a longevity and success which will provide critical support to the community. The changes undertaken in response to the SDRP feedback has also resulted in a loss of bulk along the South Steyne frontage thereby reducing the potential visual impacts of the proposal.</p> <div style="text-align: center;">  <p>SOLE STREET BUILDING TO WESTWORK OF SOUTH STEYNE</p> <p>01 APPROVED 3A ENVELOPE VIEW LOOKING WEST FROM SOUTH STEYNE</p>  <p>OPEN UNDERCROFT TO BUILDING 0 TO ALLOW FOR A BOLD CONNECTION TO MARY BEACH NEW PUBLIC PORCH/COFFEE</p> <p>02 PROPOSED 3A ENVELOPE VIEW LOOKING WEST FROM SOUTH STEYNE</p> </div> <p>Overall the proposed changes are not considered to have any unacceptable impacts on the Drummond House heritage item, which will continue to retain</p>

SDRP Comment	Response
	<p>its own sense of identify within the streetscape with the principal significant elements of this item being retained and conserved. The Drummond House heritage item as well as the vicinity heritage items along South Steyne and Victoria Parade sit within a heavily altered context already. The proposal is simply seeking to replace later non-significant buildings with new facilities which better respond to the site context and which are of design excellence being designed in collaboration by two of Australia’s most prominent and celebrated architects.</p> <p>The primary significance of Drummond House is vested in its non-tangible state-significant heritage values being its continued charitable operations over a long period of time at this site. While the subject proposal seeks to retain and conserve the front principal form of the existing building, noted as being of secondary heritage significance, the ultimate goal of the proposal is to facilitate the ongoing successful operation of the state-significant charitable operations.</p> <p>Minor physical and visual impacts associated with the proposed built form of the new development are considered acceptable as the outcome of the proposal will be to successfully safeguard the continued operation of Royal Far West and facilitate the critical support they provide for vulnerable children and families in need. This in turn is protecting and conserving the state heritage significant values of the heritage item and should therefore be supported strongly from a heritage perspective. The changes undertaken in response to the SDRP feedback have resulted in a superior heritage outcome for the place.</p>

Please don't hesitate to contact me should you wish to discuss any aspect of this letter.

Yours sincerely,



Jonathan Bryant
 Director | Heritage
 +61 2 8233 9903
 jbryant@urbis.com.au