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Royal Far West
c/o Lighthouse Project Group
Suite 201, Level 2
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To whom it may concern,

HERITAGE LETTER - ROYAL FAR WEST (S75W MODIFICATION TO PART 3A CONCEPT APPROVAL MP10_0159): DPIE RESPONSE TO SUBMISSIONS

1. BACKGROUND

This letter has been prepared in response to the Request for Responses to Submissions received from the Department of Planning, Industry & Environment (DPIE) dated 23 September 2021, in relation to Concept Plan Modification (MP 10_0159 Mod 1) for 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:

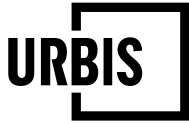
- Use of the site for a mixed use development with associated hospital facility, "Centre for Excellence";
- Indicative building envelopes for buildings;
- Tourist and visitor accommodation, residential, retail/commercial and hospital/medical uses to a maximum FSR of 3:1;
- Basement car parking for 184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

The exhibition of the Concept Plan Modification ended on 6 September 2021. Northern Beaches Council (Council) have provided a submission and four government agencies have provided advice. To date, 45 public submissions have been received, of which 43 object to the proposal.

This letter has been prepared to respond to the built heritage related issues raised in submissions, and summarised by DPIE in their Request for Responses to Submissions as follows:

2. Heritage

Council has advised it does not support the proposed works to Drummond House. The Department requests:



- *that you consult further with Council and make any design changes necessary to resolve its position that the proposed works to Drummond House result in an unsatisfactory heritage outcome*
- *clarification why extensive works to Drummond House did not form part of the original concept proposal noting that the proposed modification contends Drummond House is now not fit for purpose*
- *a revised Heritage Impact Statement to include more detailed consideration of the potential impact of the proposed modified concept proposal on the heritage value of neighbouring heritage items.*

This letter should be read in conjunction with the following heritage documents submitted to DPIE as part of the Concept Plan Modification:

- Drummond House Conservation Management Plan prepared by Urbis and dated 20 November 2020.
- Heritage Impact Statement for the Concept Plan Modification prepared by Urbis and dated 22 July 2021.

2. HERITAGE CONTEXT

The site area contains one heritage item being 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 (as identified in the Northern Beaches Council's established Statement of Significance – included verbatim below); 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 established Statement of Significance for the heritage item on the NSW State Heritage Inventory (that is, Northern Beaches Council's established Statement of Significance) is included below 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 subject site area also adjoins a number of heritage items as identified below:

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

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

The heritage context of the *Drummond Far West Home* heritage item and the broader Royal Far West site is shown in the following heritage map extract.

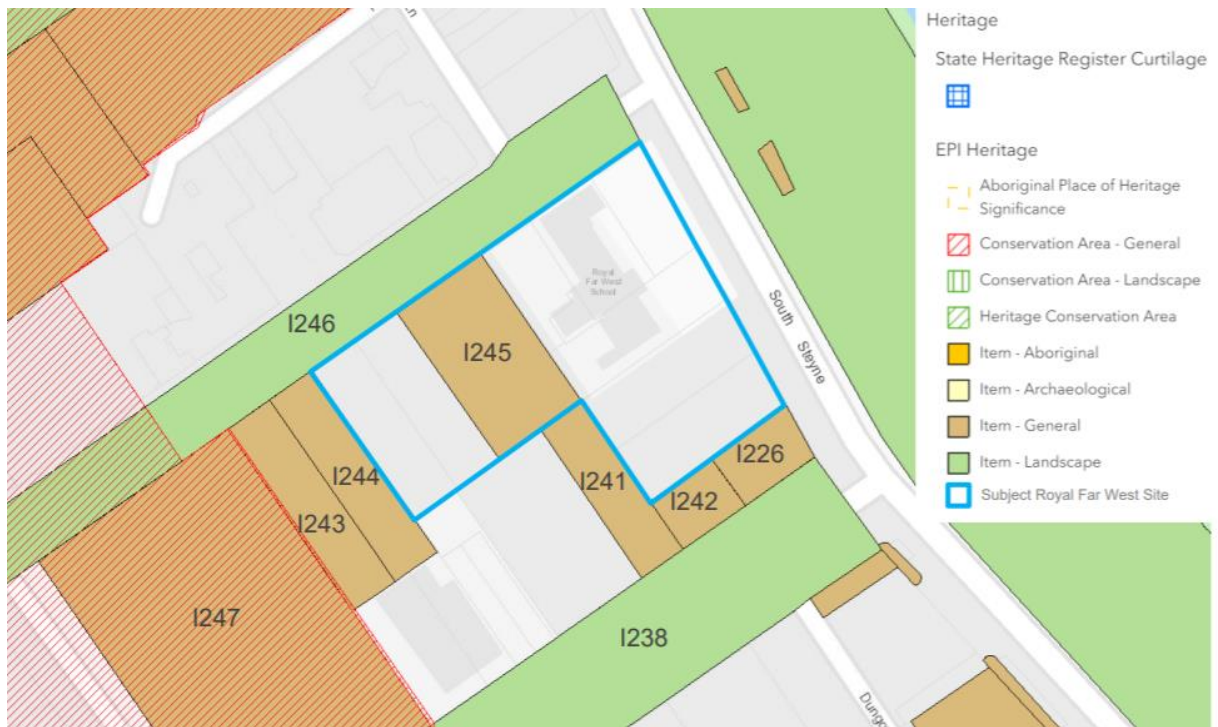


Figure 1 Extract of heritage map showing the broader Royal Far West site in blue

Source: NSW Planning Portal 2021


3. HERITAGE RESPONSES TO DPIE REQUEST FOR SUBMISSIONS


Table 1 Heritage Responses to DPIE Submissions



DPIE Heritage Comment	Response
<p>Council has advised it does not support the proposed works to Drummond House. The Department requests:</p> <ul style="list-style-type: none"> ▪ that you consult further with Council and make any design changes necessary to resolve its position that the proposed works to Drummond House result in an unsatisfactory heritage outcome 	<p>Since the date of this Request for Responses to Submissions, the project team have met with Northern Beaches Council on the following occasions to discuss the proposal and collaborate on the amended design:</p> <ul style="list-style-type: none"> ▪ 8 October 2021 (workshop) ▪ 12 October 2021 (site visit) ▪ 22 October 2021 (workshop) ▪ 11 November 2021 (detailed workshop) <p>We understand that Council’s feedback was provided initially before an internal inspection of Drummond House was conducted. Since the first workshop meeting, Council have had the opportunity to undertake an internal site visit of Drummond to assist in their understanding of the existing site conditions and state of existing facilities for Royal Far West.</p> <p>The project team has engaged with Northern Beaches Council in exploring opportunities to review the proposed design to address heritage concerns, and to explain in detail the critical requirements for the future success and longevity of Royal Far West. In response to these discussions, further amendments to the design have been made to ensure that the heritage concerns about Drummond House are appropriately acknowledged and addressed. This includes a reduction in the proposed footprint in the extension to Drummond House to allow more of the front bay to be revealed and understood. This will allow an appreciation of the ‘wing form’ style of the front bay and facilitate heritage interpretation of the place. This is a positive heritage outcome for the place.</p> <p>See extract of proposed ground floor envelope plan below.</p>

DPIE Heritage Comment	Response
<ul style="list-style-type: none"> clarification why extensive works to Drummond House did not form part of the original concept proposal noting that the proposed modification contends Drummond House is now not fit for purpose 	<p>The previous scheme did not sufficiently provide for the ongoing safety and privacy of the users of the place and as such an amended design is required to address these critical requirements.</p> <p>We have been assured that the current buildings are not fit for use including Drummond House. Drummond House is a highly modified inter-war institutional building which has been subject to numerous rounds of major changes over the years. As an institutional building it was constructed at the time to meet a particular purpose and was modified extensively as these needs changed. Institutional buildings such as Drummond House were built to meet specific requirements and to be functional and it is extremely common to see buildings of this typology altered over time to adapt to evolving requirements of the use.</p> <p>The original form and fabric of Drummond House is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations.</p> <p>The Concept Plan Modification including the proposed changes to Drummond House has been developed by the architects to facilitate and futureproof a unique and highly sensitive use which includes the protection of</p>

DPIE Heritage Comment	Response
	<p>vulnerable children. The revised proposal now 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. This is an extremely critical aspect of the success of Royal Far West and is entirely focused on ensuring protection and privacy for its users.</p> <p>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. Further, the amended proposal has been designed by renowned architects to ensure that all new buildings and interventions are of a high architectural quality and design excellence worthy of the site's significance and history.</p>
<ul style="list-style-type: none"> ▪ a revised Heritage Impact Statement to include more detailed consideration of the potential impact of the proposed modified concept proposal on the heritage value of neighbouring heritage items. 	<p>This heritage letter has been prepared to respond to these queries and should be read in conjunction with the submitted Heritage Impact Statement.</p> <p>The subject site is located in the vicinity of other heritage items, with the following items having an interface with the proposal:</p> <ul style="list-style-type: none"> ▪ Item 226 House at 15-16 South Steyne, being the Victorian 'terrace' house to the immediate south of the site on South Steyne. ▪ Item 242 Residential flat building at 31 Victoria Parade to the immediate south of the site. ▪ Item 241 Residential flat building at 29 Victoria Parade to the immediate south of the site. <p>The potential heritage impacts of the Concept Plan Modification on the above heritage items has been considered in detail throughout the design development phase of this application, and has been discussed in detail with Northern Beaches Council and the State Design Review Panel. The Concept Plan Modification is considered to have an acceptable heritage impact on the above adjoining heritage items for the following reasons:</p> <ul style="list-style-type: none"> ▪ The proposed scale and massing of the Concept Plan Modification design along South Steyne to the immediate north of the Victorian terrace at 15-16 South Steyne is not dissimilar to the scale and massing of the existing building.

DPIE Heritage Comment	Response
	 <p>The new design includes a similar physical setback from this heritage item to the south to what currently exists, but will provide an improved aesthetic outcome with a well designed building replacing a generally pedestrian masonry structure.</p> <p>The existing views to and from this heritage item will remain generally unchanged as the primary aspects of the building and its curtilage as well as its position in the streetscape will not be modified. Changes to the contemporary development to the north will not result in reduced or obscured heritage value for this vicinity heritage item.</p> <p>Overall the proposed interface with this heritage item will not result any cumulative visual heritage impacts compared with the existing built form context. There are no physical works proposed to the adjacent heritage item which will retain its existing curtilage and significant fabric.</p> <ul style="list-style-type: none"> ▪ The adjacent heritage items on Victoria Parade to the south of the subject site are residential flat buildings oriented away from the subject site.

DPIE Heritage Comment	Response
	 <p data-bbox="651 943 1414 1227">These buildings are strong buildings within the streetscape which can withstand surrounding development without detracting from their prominence in the street or their identified significance. Both buildings are three storeys high and constructed with a robust masonry exterior. The subject proposal will have no adverse physical or visual impacts on these two adjacent heritage items and won't obstruct any significant views to either of the buildings. The identified significance of these two residential flat buildings will be retained and conserved.</p> <ul data-bbox="603 1261 1422 1995" style="list-style-type: none"> ▪ The proposed Building C envelope (included below) has been assessed for its potential visual impact on the adjacent heritage items. In particular the impact of the revised Building C envelope has been considered with regard for existing views towards Drummond House. Overall the revised Building C envelope is not considered to result in a material impact on Drummond House – Building C will be visible in broader views along Wentworth Street towards Drummond House, however the existence of the building and envelope will not have an adverse visual impact. Drummond House already sits within an altered contemporary context and is already surrounded by a variety of contemporary built forms. In particular, the existing Building CCK to the immediate west of Drummond House is substantially larger in scale compared with the heritage item, as is the existing development on the opposite northern alignment of Wentworth Street. The proposed Building C envelope is therefore consistent with the established built form of the immediate locality within which Drummond House sits, and this revised envelope providing a marginally taller form, will not have a cumulative adverse heritage impact on Drummond House, which will still be able to be viewed in its existing setting and no significant views will be compromised.

DPIE Heritage Comment	Response
	  <ul style="list-style-type: none"> ▪ Further, the Building C envelope is setback further from the street frontage than Drummond House itself and provides an appropriate response to the streetscape and the heritage item (see ground floor envelope plan below). The wing form which projects north from this building has no detrimental impact on Drummond House building or views to or from it as this element has been angled away from Drummond House, providing an appropriate physical buffer. The new ground floor layout has been prepared to respond to the Council's concerns regarding setback and provides a larger area of breathing space around the Drummond House building to appreciate the original building form and setting. ▪ The proposed additional height at the rear of Building B (directly behind Drummond House) will not be visible from the public domain and will not visually dominate the retained portions of the heritage item. Within the

DPIE Heritage Comment	Response
	<p>context of the neighbouring developments, this proposed increased scale is considered minor and will not have an adverse visual impact on the significance of Drummond House, which will continue to be able to be read and appreciated within the streetscape.</p> <p>The diagram is a site plan showing the layout of buildings and setbacks. On the left is 'EXISTING BUILDING A 'C.C.K. BUILDING'' with a red hatched pattern. To its right is 'EXISTING BUILDING B DRUMMOND HOUSE' in purple. Below Drummond House are two 'RFW ACCOMMODATION' blocks in orange, separated by a 'LANDSCAPING / PLAYGROUND' area in green. To the right of the RFW blocks is a 'COMMERCIAL' building in red. Dimensions include 14.7m setbacks for Drummond House and RFW blocks, a 6m setback for the Commercial building, and a 3.6m setback for the RFW blocks. A 'SUBJECT SITE' boundary is indicated at the top left.</p>

4. HERITAGE RESPONSES TO COUNCIL SUBMISSIONS

The following table provides a response to the summary heritage issues raised in Northern Beaches Council's (Council) Submission letter dated 6 September 2021. The responses provided below have had regard for the extended discussion provided by Council in their letter which has not been reproduced below.


Table 2 Heritage Responses to Council Submission


Council Summary Heritage Comment	Response
<p>The proposal provides a poorer heritage outcome than the approved concept plan.</p>	<p>The previous scheme did not sufficiently provide for the ongoing safety and privacy of the users of the place and as such an amended design is required to address these critical requirements.</p> <p>As previously discussed in this letter, the project team have met with Northern Beaches Council on the following occasions to discuss the proposal and collaborate on the amended design:</p> <ul style="list-style-type: none"> ▪ 8 October 2021 (workshop) ▪ 12 October 2021 (site visit) ▪ 22 October 2021 (workshop) ▪ 11 November 2021 (detailed workshop) <p>We understand that Council's feedback was provided initially before an internal inspection of Drummond House was conducted. Since the first workshop meeting, Council have had the opportunity to undertake an internal site visit of Drummond to assist in their understanding of the existing site conditions and state of existing facilities for Royal Far West.</p> <p>The project team have engaged with Northern Beaches Council in exploring opportunities to review the proposed design to address heritage concerns, and to explain in detail the critical requirements for the future success and longevity of Royal Far West. In response to these discussions, further amendments to the design have been made to ensure that the heritage concerns about Drummond House are appropriately acknowledged and addressed. This includes a reduction in the proposed footprint in the extension to Drummond House to allow more of the front bay to be revealed and understood. This will allow an appreciation of the 'wing form' style of the front bay and facilitate heritage interpretation of the place. This is a positive heritage outcome for the place.</p>

Council Summary Heritage Comment	Response
	<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 heritage 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.</p> <p>Changes undertaken to the design in collaboration with Northern Beaches Council have resulted in a superior heritage outcome and in our opinion, sufficiently address the heritage concerns raised in the Submissions.</p>
<p>Drummond House is of high heritage significance for its physical characteristics and presentation, which the proposal fails to provide for.</p>	<p>It is important to acknowledge the identified heritage values of Drummond House are twofold, being;</p> <ul style="list-style-type: none"> ▪ 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. <p>The established Statement of Significance for the heritage item on the NSW State Heritage Inventory (that is, Northern Beaches Council’s established Statement of Significance) is included below as follows:</p> <p style="text-align: center;"><i>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.</i></p> <p>This Statement of Significance has formed the basis for the approach to heritage conservation in this proposal, which seeks to retain, enhance and</p>

Council Summary Heritage Comment	Response
	<p>protect the ongoing use and function of Royal Far West which is identified as its primary significance. The physical aspects of the building which are considered to represent the place as 'a good example of Inter-War Classical style' have been retained and conserved within the proposal, being the primary front wing.</p> <p>We are satisfied that the revised proposal appropriately conserves the identified significance of the site as established by Northern Beaches Council in the current Statement of Significance.</p> <p>As part of this proposal a revision was undertaken to the outdated Conservation Management Strategy (CMS) for the Royal Far West site, replacing this old document with a comprehensive updated Conservation Management Plan (CMP) for Drummond House. This CMP included extensive further research and analysis for the place and provision of comprehensive management policies for the place. Reference to the old outdated CMS is not relevant for this proposal, in this modern climate, as it does not reflect current heritage practice and approach nor the owner's requirements. All assessment has had regard for the updated CMP and its extensive analysis and policy.</p>
<p>The demolition of the majority of the Drummond House fails to properly adapt the item and retain significant features and presentation.</p>	<p>We have been assured that the current buildings are not fit for use including Drummond House. Drummond House is a highly modified inter-war institutional building which has been subject to numerous rounds of major changes over the years. As an institutional building it was constructed at the time to meet a particular purpose and was modified extensively as these needs changed. Institutional buildings such as Drummond House were built to meet specific requirements and to be functional and it is extremely common to see buildings of this typology altered over time to adapt to evolving requirements of the use.</p> <p>The original form and fabric of Drummond House is obscured by the additional third storey constructed in 1945 and the contemporary changes to the exterior including painting of the original face brick. The overall building form is not original and the roof form and materiality is not original. The original balustrades to the principal frontage have been replaced and the windows have been modified. Internally, the majority of early or original features have been stripped out and the original configuration modified to accommodate the change in use over time for the continuation of charitable institution operations.</p>

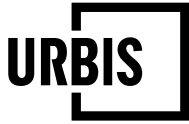
Council Summary Heritage Comment	Response
	<p>The Concept Plan Modification including the proposed changes to Drummond House has been developed by the architects to facilitate and futureproof a unique and highly sensitive use which includes the protection of vulnerable children. The revised proposal now 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. This is an extremely critical aspect of the success of Royal Far West and is entirely focused on ensuring protection and privacy for its users.</p> <p>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. Further, the amended proposal has been designed by renowned architects to ensure that all new buildings and interventions are of a high architectural quality and design excellence worthy of the site's significance and history.</p> <p>As discussed above, design modifications have occurred in consultation with Northern Beaches Council since the date of Submissions received, resulting in a reduction in footprint area to expose more of the Drummond House front wing form and improve heritage interpretation of the site. This is a positive heritage outcome.</p> <p>Overall, we strongly consider that the identified significance of the place, being its historic use and some primary physical features, are being appropriately managed and protected as part of this proposal.</p>
<p>The demolition of the majority of the item fails to meet the objectives of clause 5.10 of the Manly Local Environmental Plan 2013.</p>	<p>A detailed impact assessment against Clause 5.10 of the LEP has been undertaken in the Heritage Impact Statement lodged with the modification application. As discussed above in detail, the identified significance of the place, being its historic use and some primary physical features, are being appropriately managed and protected as part of this proposal.</p>
<p>The proposal fails to properly address Section 3.2 Heritage Considerations of the Manly Development Control Plan.</p>	<p>A detailed impact assessment against Section 3.2 of the DCP has been undertaken in the Heritage Impact Statement lodged with the modification application (refer to pages 42-46 of the Heritage Impact Statement).</p>
<p>Proposed work within the vicinity of Drummond House</p>	<p>As discussed above, design modifications have occurred in consultation with Northern Beaches Council since the date of Submissions received, resulting</p>

Council Summary Heritage Comment	Response
<p>fails to provide an adequate curtilage and buffer and simultaneously loses its presentation through rear dominant additions.</p>	<p>in a reduction in footprint area to expose more of the Drummond House front wing form and improve heritage interpretation of the site. This is a positive heritage outcome.</p>
<p>The proposal provides a poor response and outcome to the adjoining heritage items, such as The Terraces at 15-16 South Steyne.</p>	<p>The potential heritage impacts of the Concept Plan Modification on the vicinity heritage items has been considered in detail throughout the design development phase of this application, and has been discussed in detail with Northern Beaches Council since the date of Submissions being received and the State Design Review Panel. The Concept Plan Modification is considered to have an acceptable heritage impact on the vicinity heritage items with a direct interface with the subject site for the following reasons:</p> <ul style="list-style-type: none"> ▪ The proposed scale and massing of the Concept Plan Modification design along South Steyne to the immediate north of the Victorian terrace at 15-16 South Steyne is not dissimilar to the scale and massing of the existing building.  <p>The new design includes a similar physical setback from this heritage item to the south to what currently exists, but will provide an improved aesthetic outcome with a well designed building replacing a generally pedestrian masonry structure.</p> <p>The existing views to and from this heritage item will remain generally unchanged as the primary aspects of the building and its curtilage as well as its position in the streetscape will not be modified. Changes to</p>

Council Summary Heritage Comment	Response
	<p>the contemporary development to the north will not result in reduced or obscured heritage value for this vicinity heritage item.</p> <p>Overall the proposed interface with this heritage item will not result any cumulative visual heritage impacts compared with the existing built form context. There are no physical works proposed to the adjacent heritage item which will retain its existing curtilage and significant fabric.</p> <ul style="list-style-type: none"> ▪ The adjacent heritage items on Victoria Parade to the south of the subject site are residential flat buildings oriented away from the subject site.  <p>These buildings are strong buildings within the streetscape which can withstand surrounding development without detracting from their prominence in the street or their identified significance. Both buildings are three storeys high and constructed with a robust masonry exterior. The subject proposal will have no adverse physical or visual impacts on these two adjacent heritage items and won't obstruct any significant views to either of the buildings. The identified significance of these two residential flat buildings will be retained and conserved.</p>

5. SUMMARY & CONCLUSION

Overall the proposed changes are not considered to have any unacceptable impacts on the Drummond House heritage item, which will continue to retain 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.

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.

Minor physical and visual heritage 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. Changes undertaken to the design in collaboration with Northern Beaches Council have resulted in a superior heritage outcome and in our opinion, sufficiently address the heritage concerns raised in the Submissions.

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

Yours sincerely,

A handwritten signature in cursive script that reads "Ashleigh Persian".

Ashleigh Persian
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