HERITAGE IMPACT STATEMENT 67 EUROBIN AVENUE MANLY



The front elevation of No. 67 Eurobin Avenue Manly

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I.0 INTRODUCTION

This report was prepared by Ruth Daniell for the owners of the property to address the proposed alterations and additions at 67 Eurobin Avenue Manly.

2.0 REQUIREMENT FOR THIS REPORT

It is proposed to make alterations and additions to an existing apartment building located on the north east side of Eurobin Avenue Manly. The building at No. 67 Eurobin Avenue is part of the Heritage Item-'Group of 2 storey residential flat buildings – Eurobin Avenue, north eastern side (from Pittwater Road to Collingwood Street) Manly'.

Northern Beaches Council requires a heritage report for work that occurs to a Heritage Item to assess the impact of the proposed alterations on the Heritage Item.

3.0 LOCATION

No. 65 Eurobin Avenue is located on the northern side of Eurobin Avenue between Pittwater Road and Collingwood Street Manly. It is located at the end nearer Collingwood Street. No. 67 and some the properties along Eurobin Avenue back onto the reserve facing Manly Lagoon.



Location Plan with the arrow indicating the location of the property. Source: Six Maps



Aerial bhotograbh showing No. 67 Eurobin Avenue. Source Six Mabs.

4.0 METHODOLOGY

This report uses the methodology outlined in the NSW Heritage Office Manual and the Australian ICOMOS Burra Charter.

5.0 BACKGROUND HISTORY

The History of the Locality

The first land grant at Manly was thirty acres made to Gilbert Smith in 1810. The northern boundary of Baker's land grant became the alignment of the Corso and the southern (parallel) boundary became that of Ashburner Street.

In 1842, a 100 acre grant was made to John Thompson (Deputy Surveyor General) for the land immediately to the north and west of Baker's land grant. In 1852 Henry Gilbert Smith bought the Thompson grant and began laying out a township. In 1854 Smith began the ferry service to Circular Quay and Manly's development began. In 1856 Gilbert cleared and named the Corso.

Smith has a grand plan for a private village at Manly, 'Montpelier'.

In the 1860s Manly was the fashionable bathing place of Port Jackson.

Manly boomed in the 1870s for the first time and a number of gentlemen's villas were constructed and by the mid 1870s the villages had many services including banks, a post and telegraph office. On 6 January 1877 the village of Manly and its hinterland became the Municipal District of Manly. Remarkable change occurred during the next 20 years as the Council continued to transform the sandy flat into a residential suburb and tourist resort. Large building projects were completed, native vegetation was cleared and exotic species planted. While extensive areas of land in the district were sold, very little outside the village was settled. The population grew from 1827 in 1881 to 3236 ten years later.

Manly was a confident and prosperous village by the end of the nineteenth century. Its rapid development in the first decade of he 20th century was partly the result of surfing's evolution into a mass participation sport. But probably of greater significance was the Sydney wide boom at this time and the buoyant economy in the years prior to the Great War.

Despite the fact that the ferry renamed Manly's 'real highway', the land route assumed greater importance in the years prior to World War I.

Manly continued to boom in the 1920s, as it had in the first 20 years of the century. Manly was becoming more of a Sydney suburb and less of a tourist resort. A number of subdivisions were undertaken and the real estate market was lively. The depression had an impact on Manly's development, but Manly was one of the first suburbs in which the building industry recovered. Blocks of flats, already a feature in Manly for twenty years took the place of many substantial private dwellings. In 1935 Manly received a stream of building applications for flats. In 1940 Manly Council sought permission to ban flats in Seaforth, Clontarf and a portion of Balgowlah where there had been 'great building activity' in the previous two years.

Sands Directories

The following information was obtained from the Sands Directories. The Sydney Sand's Directory was published annually between 1858 and 1932. Each issue of the Sands Directories listed householders, businessmen, public institutions and officials of the entire Sydney area, in a format that varied during the 74 years of publication.

Sands was not a legal document and the information was collected by a Sand's agent who called door to door and the entries are variable and may contain errors.

The street by street listing includes the householders' names and title, street name and house name where established, and the householders occupation and type of business.

Eurobin Avenue is first listed in the Sands Directory in 1930. In 1930 there are three properties and three occupants listed: Mrs Ada Hadley Percy MTipping A G Faulkes

In 1931 there are: North side Mrs Ada Hadley George Jackson

South Side A. Davies Thos. Rooney Reg T. Thompson Joe Bidell

In 1932 there are:

North side Alfred H James George Jackson

South Side

Joseph Biddell RT Thompson 'Sterling' A Brand 'Hurlstone' P M Tipping 'Tsen Ruo' Miss L Heard 'Eden Brae' A G Faulkes 'Euripedes' Arthur Davies T Rooney 'Columbo'

As there are no street numbers it is not possible to determine an exact construction date for the building. However the building in design is a typifies a style indicative of 1930s flat building.



Architectural plan for additions to the rear of the building dated 1948, but not constructed.



Architectural rear elevation additions to the rear of the building dated 1948, but not constructed. The owner was Mrs F. J. Sullivan.

Summary of the Documentary Evidence

The establishment of Eurobin Avenue and its early development occurred in the early 1930s. This coincided with a post depression era building boom of the 1930s, which included many residential flat buildings.

No. 67 Eurobin Avenue was built in the 1930s.

6.0 THE HERITAGE ITEM

The Heritage Item listed on the Manly LEP is a group of 2 storey residential flat buildings, Eurobin avenue, northern side from Pittwater Road to Collingwood Street, Item No. 1154 – Local item. The real property description is SP 10663; Lot B, DP 382088; SP 16862; SP 62282; Lots 53, 54, 59, 61–63, 70, 72, 75, 80 and 81, DP 14521; Lot 1, DP 1033816; Lot B, DP 184940; Lot 1, DP 328983; SP 54561; SP 56288; Lot B, DP 329376; SP 52019; SP 513; SP 47559; SP 42119; SP 36272; SP 13982; Lots A–E, DP 17744; SP 10063; SP 14914; SP 69959; SP 6307; SP 15126.

The heritage items are characterised by:

- Overall rectangular form, two storey scale, a steeply pitched hipped and tile roof.
- The materials are rendered brick or face brick, tiled roof and timber joinery including timber double hung windows, and on No. 65 these are casement or sliding windows
- On some buildings concrete roof tiles have replaced the original tiles.

Description of No. 67 Eurobin Avenue Manly

No. 67 Eurobin Avenue is a two storey Inter-War flat building. The symmetrical façade has a central projecting bay. The façade is rendered and may have been unpainted brickwork like the majority of the flats in the heritage listed, which have red and dark grey face brick with decorative areas of brickwork. The stepped brickwork details on the former open balconies on the front facade and first floor porch suggest the influences of the Art Deco style. The windows are timber framed with a high horizontal glazing mullion. The tiled roof is hipped with a smaller hipped section over the projecting bay. There is another small hip over the external entry porch at the top of the stairs to the first floor. The roof has a wide eave with a stepped barge under the eave. The building has a rectangular form. accessing the top flat.

There is a set of rear stairs in poor condition, and single storey structures including a laundry. There is a garage forward of the front building line on the western side of the front setback.

Interior photographs are at Annexure A.

Evaluation of Heritage Significance

The apartment building is a typical style of an Inter War flat building built in large numbers through Sydney suburbs in the 1930s. The heritage significance derives from the group value as a pattern of building in the streetscape. The building does not have historic associations with persons or events of importance. There is no evidence that the building is a seminal work of an important architect. There is no technical innovation in the building. There are no important social associations. The flat building is not rare. The building has representational value as a typical Inter War two storey flat building.



The front of No. 67 Eurobin Avenue view from inside the front garden.





Detail of the windows on the western facade.

Detail of the front facade.



The rear facade of No.67 Eurobin Street showing the single storey laundry under the skillion roof and the second (rear) stair to the first floor unit.

Site and Context

The following photographs show that No. 67 is located in a context of two storey flat buildings that form part of the Heritage Item.





No. 51 (left) and 53 (right) Eurobin Avenue is a similar style residential flat building which have

No. 65 Eurobin Avenue Manly has a contemporary fence and a contemporary addition to the (right hand) side and the rear.



The rear addition to 65 Eurobin Avenue viewed from the rear garden of No. 67.



View of the side additional No. 65 Eurobin Avenue.



View of the contemporary rear addition to No. 69 Eurobin Avenue from the rear garden of No. 67 Eurobin Avenue.

8.0 THE PROPOSED WORKS

This report addresses the proposed alterations and additions shown in the DA drawings by Incidental Architecture. It is proposed to covert the exiting duplex to a single family home.

The proposed works retain:

- The existing building and the side stair
- The front facade is not altered and reinstates the first floor open verandah
- The existing garage is retained

Ground Floor

- The external stair is retained on the eastern side of the building
- The original entrance to the ground floor is bricked up
- The room layout of the principal rooms is maintained
- New internal stairs are added within the existing room layout

- The former verandah will be a study
- A new ensuite and laundry are inserted in an existing room
- A new addition is proposed at the rear
- The eastern wall of the proposed additions the same as the same side setback as the existing external stair
- A roofed porch is between the the predominant side setback and the eastern boundary
- A new entry is proposed on the eastern side of the new addition
- The new addition contains a kitchen, living and dining area

Rear garden

- New hard and soft landscaping to the rear garden
- New swimming pool

First Floor

- New stair and living room in the existing building
- Substantial retention of the existing room layout
- New deck to the rear bedrooms (bedroom 1 & bedroom 2)
- A void over the ground floor living area
- A void over the swimming pool
- New landscaped planter

The Design of the Rear Addition

The design of the rear addition is contemporary and uses lightweight materials contrasting with masonry side walls.

Materials

The materials are:

- Painted brickwork
- Reinforced concrete
- Fibre cement cladding
- Steel roofing
- Hardwood for the pergola and the decking
- Timber for the sliding shutters on the side walls
- Polycarbonate roofing over the pergola

8.0 HERITAGE IMPACT STATEMENTS

The heritage impact is considered in relation to:

- The Manly Local Environmental Plan 2013 (LEP)
- The Manly Development Control Plan 2013 (DCP)
- The NSW Heritage Office Guidelines for Heritage Impact Statements

8.1 The Manly Local Environmental Plan 2013(LEP)

The LEP addresses heritage in Section 5.10. The relevant provisions are set out below:

5.10 Heritage Conservation

(1) Objectives

- The objectives of this clause are as follows:
- (a) to conserve the environmental heritage of Manly,
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,
- (c) to conserve archaeological sites,
- (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.
- (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.

Response: This HIS has been prepared for a building in a group Heritage Item to accompany an application for a development consent.

(3) When consent not required

However, development consent under this clause is not required if:

(a) the applicant has notified the consent authority of the proposed development and the consent authority has advised the applicant in writing before any work is carried out that it is satisfied that the proposed development:

(i) is of a minor nature or is for the maintenance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or archaeological site or a building, work, relic, tree or place within the heritage conservation area, and

(ii) would not adversely affect the heritage significance of the heritage item, Aboriginal object, Aboriginal place, archaeological site or heritage conservation area, or

(b) the development is in a cemetery or burial ground and the proposed development:

(i) is the creation of a new grave or monument, or excavation or disturbance of land for the purpose of conserving or repairing monuments or grave markers, and

(ii) would not cause disturbance to human remains, relics, Aboriginal objects in the form of grave goods, or to an Aboriginal place of heritage significance, or

(c) the development is limited to the removal of a tree or other vegetation that the Council is satisfied is a risk to human life or property, or

(d) the development is exempt development.

Response: Consent is required.

(4) Effect of proposed development on heritage significance

The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).

Response: The applicant has commissioned this HIS to assist council.

(5) Heritage assessment

The consent authority may, before granting consent to any development:

- (a) on land on which a heritage item is located, or
- (b) on land that is within a heritage conservation area, or
- (c) on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

Response: This Heritage Impact Statement has been prepared to assist Council to assess the potential impacts of the development proposal on the Heritage Item.

(6) Heritage conservation management plans

The consent authority may require, after considering the heritage significance of a heritage item and the extent of change proposed to it, the submission of a heritage conservation management plan before granting consent under this clause.

Response: The site is part of a group heritage item. It is a local item. Previous similar development has not required a heritage conservation management plan.

(7) Archaeological sites The consent authority must, before granting consent under this clause to the carrying out of development on an archaeological site (other than land listed on the State Heritage Register or to which an interim heritage order under the Heritage Act 1977 applies)—

(a) notify the Heritage Council of its intention to grant consent, and

(b) take into consideration any response received from the Heritage Council within 28 days after the notice is sent.

Response: The disturbance is unlikely to impact on any archaeological potential.

(8) Aboriginal places of heritage significance The consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance—
(a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and
(b) notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.

Response: The site has not been identified as an area where it is likely to that the proposal will impact on an Aboriginal place of heritage significance.

8.2 The Manly Development Control Plan 2013 (DCP)

The relevant sections of the DCP are outlined below.

2.1.5.1 Heritage Management Documents

This section of the DCP requires a heritage impact statement prepared by a qualified Heritage Consultant to assist Council in the assessment of the heritage impact.

Response: This heritage impact statement has been prepared and complies with the requirements.

3.2 Heritage Considerations

Heritage Items and Conservation Areas listed in the LEP; development in the vicinity of heritage.

Relevant DCP objectives in relation to heritage in this plan include the following:

Objective 1)

- significant fabric, setting, relics and view associated with heritage items and conservation areas;
- the foreshore, including its setting and associated views; and \cdot
- potential archaeological sites, places of Aboriginal significance and places of natural significance.

Objective 2)

• To ensure any modification to heritage items, potential heritage items or buildings within conservation areas is of an appropriate design that does not adversely impact on the significance of the item or the locality.

Objective 3)

• To ensure that development in the vicinity of heritage items, potential heritage item and/ or conservation areas, is of an appropriate form and design so as not to detract from the significance of those items.

Objective 4)

• To provide infrastructure that is visually compatible with surrounding character and locality/visual context with particular regard to heritage buildings/areas and cultural icons.

Objective 5)

• To integrate heritage management and conservation into the planning development process including incentives for good heritage management, adaptive reuse, sustainability and innovative approaches to heritage conservation.

Response: The proposal meets these objectives. Refer to the comments in 3.2.1.1.

3.2.1 Consideration of Heritage Significance

LEP Clause 5.10(4) requires that Council consider the effect of proposed development on heritage significance of a heritage item or heritage conservation area.

3.2.1.1 Development in the vicinity of heritage items, or conservation areas

a) In addition to LEP listings of Environmental Heritage (LEP Schedule 5), this DCP requires consideration of the effect on heritage significance for any other development in the vicinity of a heritage item or conservation area.

Response: No. 67 is part of a heritage listed group. This HIS considers the impact of the buildings forming the Heritage Items, in the vicinity of the subject site, in section 8.3 of this report.

b) Proposed development in the vicinity of a heritage item or conservation area must ensure that:

i) it does not detract or significantly alter the heritage significance of any heritage items, conservation area or place;

Response: The proposal does not detract from the heritage significance of No. 67 and the group of buildings forming the heritage item because it is an architecturally, well designed, contemporary addition of an appropriate scale, height and design. The proposed works retain a high percentage of significant fabric, internally and externally. Refer to the interior photographs annexed to this report.

ii) the heritage values or character of the locality are retained or enhanced;

Response: The heritage values of the listed group of Inter War flat buildings are retained. Refer to the comments below.

iii) any contemporary response may not necessarily seek to replicate heritage details or character of heritage buildings in the vicinity, but must preserve heritage significance and integrity with complementary and respectful building form, proportions, scale, style, materials, colours and finishes and building/street alignments.

Response: The design of the rear addition does not a replicate the heritage listed building. Instead, it is a well designed contemporary addition. The materials for the side walls reference traditional materials. The infill is lightweight and contemporary. The design language allows the heritage fabric and the new work to be

differentiated. This is a valid approach and complies with the DCP. The additions to the adjacent buildings have taken this approach.

c) The impact on the setting of a heritage item or conservation area is to be minimised by:

i) providing an adequate area around the building to allow interpretation of the heritage item; retaining original or significant landscaping (including plantings with direct links or association with the heritage item);

ii) providing an adequate area around the building to allow interpretation of the heritage item;
 retaining original or significant landscaping (including plantings with direct links or association with the heritage item);

Response: The proposed addition occurs at the rear of the heritage item, and is a two storey high. The neighbouring buildings have two storey contemporary additions. The proposal retains a large rear garden area. No significant landscaping features are affected. The garden setting provides an adequate area for the appreciation of the heritage item and the adjoining heritage items.

iii) protecting (where possible) and allowing the interpretation of any archaeological features; and

Response: There are no identified archaeological features. The potential for archaeological features is low.

iv) retaining and respecting significant views to and from the heritage item.

Response: The proposed addition occurs at the rear of the heritage item, and is a two storey height and lower than the gutter line of the existing building. This is an appropriate height and minimises any potential issues of visual dominance. A small single storey porch is proposed on the eastern side. The significant views to the group of buildings in the heritage listed group are from the street frontage. There is no impact on significant views and vistas to the Heritage Item.

3.2.2.1 Complementary Form and Scale that Distinguishes Heritage Significance

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

Response: The design approach is not to replicate the existing building. Rather than copying materials and details from the existing building the two storey addition has been designed to be sympathetic and referential to the existing building and is able to be differentiated as new work.

b) Consideration should be given to whether making a house bigger will ruin its appearance. Additions to small houses can easily overwhelm them and use up garden space needed for private open space and impact the setting and

pattern of development in the locality. Modest additions work best and can be organised as wings or pavilions to the existing house. All additions must be at the back of the house, not the front.

Response: The proposal is a modest two storey rear addition and a small side porch. It retains a large area of rear garden space and facilitates the use of this space.

8.3 The NSW Heritage Office Guidelines for Heritage Impact Statements

The Heritage Impact Statements examine the heritage impact of the proposed alterations and additions on the existing building, which is part of a heritage listed group and the heritage items in the vicinity which are the adjoining buildings which are buildings in the heritage listed group of flat buildings.

It is important that heritage items retain their setting and curtilage. It is also important that any new development has a sympathetic and appropriate type of visual relationship with the nearby heritage item.

The documents dealing with setting and curtilage of heritage items are:

- The Australian ICOMOS Burra Charter
- The NSW Heritage Office publication 'Heritage Curtilages'

The NSW Heritage Office publication 'Heritage Curtilages' defines the term 'heritage curtilage' as: 'the area of land (including land covered by water) surrounding an item or an area of heritage significance which is essential for retaining and interpreting its heritage significance'.

The Australian ICOMOS Burra Charter does not use/or define the notion of curtilage, however it does stress the importance of 'setting' in Article 8:

'Conservation requires the maintenance of an appropriate visual setting: e.g. form, scale, colour texture and materials. No new construction, demolition or modification which would adversely affect the setting should be allowed. Environmental intrusions, which adversely affect the setting, should not be allowed. Environmental intrusions which adversely affect the appreciation or enjoyment of a place should be excluded'.

The curtilage of the heritage listed two storey group of flats can be:

- The space around the two storey blocks of flats and the unbuilt upon areas of the site
- The legal lot curtilage of the individual flat buildings

In addition there are views and vistas to the group of two storey flats from a wider area. These are known as an expanded curtilage. In the instance of the two storey blocks of flats it would include views and vistas from Eurobin Avenue and Manly Lagoon.

The Heritage Impact Statements have to consider whether there are adverse heritage impacts including:

- Disruptive visual contrasts; and
- Forms that conflict, degrade, detract or impinge by way of unsympathetic bulk height and scale, colour type, pattern or conflicting use or amenity issues.

The NSW Heritage Office Guidelines *Heritage Curtilages* and *Heritage Impact Statements* pose a series of questions to be answered when assessing the heritage impacts. The relevant questions and responses are set out below:

Statements of Heritage Impact

The relevant questions from the NSW Heritage Office Statements of Heritage Impact are set out below.

Why is the new development required to be adjacent to a heritage item?

No 65 Eurobin Avenue is an existing flat building on its own legal lot curtilage. There is the potential to develop the building on the subject site with sympathetic additions provided its does not have adverse impacts on the heritage items in the vicinity.

Has an adequate setting for the heritage items been provided, enabling the heritage significance to be maintained?

The heritage listed group of two storey flats have their individual legal lot curtilages. The proposed works to No. 67 Eurobin Avenue will not impact on the individual curtilages of the flat buildings or the collective curtilage of the group. The proposed two storey addition is located behind the front portion of the building and will not affect views to the two storey group of flats from Eurobin Avenue. The single storey porch on the eastern side will not affect the legal lot curtilage or the expanded curtilage.

Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?

The proposed alterations and additions to No. 67 Eurobin Avenue are architect designed and sympathetic to the Heritage Item in terms of placement, scale and design approach. The location of the addition at the rear minimises visual impact on the heritage item. The height of the addition is below the gutter line of the existing building.

The contemporary design approach differentiates the new work from the existing face brick flat building which is an acknowledged approach in the Australia ICOMOS Burra Charter. This is an appropriate approach because it expresses the proposed work as a contemporary 2014 layer and differentiates it from the Inter-War fabric of the existing building and the heritage listed group of flats. This is the approach of the approved and constructed additions at Nos. 65 and 67 Eurobin Avenue.

The two storey scale of the rear additions is in keeping with the scale of additions to the rear of Nos. 65 and 69 Eurobin Avenue.

The proposed alterations and additions will be lower height than the existing building. The foot print of the rear addition is smaller than the footprint of the existing building. Similarly, the single storey open porch on the eastern, lower in scale, and has a small footprint. There will be no issues of dominance on the existing building or the other flat buildings in the heritage listed group.

The proposed works not affect subdivision patterns evident on the northern side of Eurobin Avenue.

Will the public, and users of the item, still be able to view and appreciate its significance?

The appreciation and use of the group of heritage listed flat buildings will not be affected by the proposed development at No. 67 Eurobin Avenue.

9.0 SUMMARY

No. 65 Eurobin Avenue is part of a group of 1930s heritage listed flat buildings, which have group and streetscape value.

The proposed internal works at No. 67 are minor works, which do not affect important building fabric and the original layout is easily discerned.

The proposed additions are architect designed and are sensitive to the existing building. The form of the building, the external stair and a large percentage of original fabric is retained externally and internally.

The additions comprise a single storey open porch on the eastern side and a two storey addition to the rear of the building. The design of this addition is contemporary. Side walls in masonry contain a lightweight structure with a partial void on the first floor. A single storey side addition is proposed, on the eastern side, for an open entry porch.

The materials for the side walls of the rear addition, reference traditional materials yet allow, the addition to be differentiated from the historic building fabric. The addition has limited visibility from Eurobin Avenue, and less impact than approved and constructed additions at Nos. 65 and 69.

The proposed works to No. 67 do not create any disruptive visual contrasts and there is no impact on the curtilage or significant views and vistas to and from the group of heritage listed Inter War flat buildings.

The proposed works have been assessed against the consideration of the Manly LEP and the provisions of the Manly DCP and address the heritage considerations. The 'Statements of Heritage Impact' have considered the issues that are relevant to development in the vicinity of heritage items and has determined that the impact of the proposal is acceptable.

10.0 RECOMMENDATION

In light of the heritage assessment, the recommendation is that the proposed works be approved.