

3rd November 2025

J4974_03

Attention: General Manager

Northern Beaches Council
1 Belgrave Street,
Manly NSW 2095

**Re: Statement of Heritage Impact
Amending Development Application
No 22 Raglan Street, Manly (DA2022/2256)**

To whom it may concern,

This Statement of Heritage Impact (SoHI) letter is to accompany an Amending Development Application (DA) at No 22 Raglan Street, Manly utilising provisions of the Low and Mid-Rise Housing Policy and in-fill affordable housing provisions as part of the *State Environmental Planning Policy (Housing) 2021*. This letter should be read in conjunction with the previously court approved (DA2022/2256) NSW Land and Environment Court (Para-ere Holdings Pty Ltd v Northern Beaches Council 2023/00212498) and SoHI prepared by Weir Phillips Heritage for site description and heritage assessment. It should be noted that this consent allowed for the demolition of the buildings on site.

The site is located within the Northern Beaches Council Local Government Area. The principal planning instrument for the site is the *Manly Local Environmental Plan 2013* (LEP 2013). The site is not listed as a heritage item but is located within the Pittwater Road Conservation Area (C1) and is within the vicinity of other heritage items as listed by Schedule 5, Part 1 of this plan.

Amending DA Scope of Work

The proposed scope of work should be read in conjunction with the architectural drawings by Carlisle Architects includes:

- The proposal increases the height of the development from three to eight storeys including a roof terrace (as per the LMR Provisions and in-fill affordable housing provisions of the Housing SEPP). The revised design incorporates a more substantial upper-level setback than the previous scheme above the three-storey podium to reduce visual bulk and improve the transition to the surrounding context.
- The podium composition remains largely consistent with the previously approved scheme, retaining its established proportions, materiality, and relationship with the streetscape.
- The tower element presents a contemporary interpretation of the characteristic Manly and broader Sydney 1930s seaside architectural style with Mediterranean influences.

The design features deep masonry facades with a combination of arched openings and robust, timeless materials such as copper, face brick, and off-white render. These reference the architectural language of the existing backpackers' /former ambulance station façade (arched openings, face brick, solid masonry) without replicating it as a pastiche.

- Internal layouts and finishes have been modified to accommodate the revised design and functional requirements associated with the increased height and building form.

Heritage Impact Assessment

The proposed amendments, primarily relating to an increase in height from four to eight storeys (plus roof terrace), have been carefully designed to respond to both the site context and the heritage values of the surrounding area Pittwater Road HCA.

- While the proposed increase in height will result in a greater visual presence compared to the previously approved scheme, the impacts on the Pittwater Road HCA (C1) and nearby heritage items are considered acceptable for the following reasons:
 - The site is situated on the periphery of the Conservation Area, in a transitional location between the lower-scale shop-top buildings of the historical Manly Town Centre and larger, more recent developments along Raglan and Pittwater Roads. As such, the increased height will be visually contained within this evolving built context and will not dominate or diminish the overall character of the Conservation Area.
 - The design incorporates substantial upper-level setbacks above the three-storey podium, reducing perceived bulk when viewed from the street and adjoining properties. Vertical articulation, recessed balconies, and variation in façade depth have been employed to visually break down the massing of the upper levels. These measures mitigate potential visual intrusion and create a balanced interface with the existing townscape.
 - The architectural expression is a contemporary interpretation of the characteristic 1930s seaside architecture of Manly and Sydney's coastal suburbs, incorporating Mediterranean influences. The use of deep masonry façades, arched openings, and robust, high-quality materials such as copper, face brick, and off-white render ensures a strong and respectful dialogue with the historical architectural vocabulary of the area, particularly referencing the former ambulance station/backpackers building without resorting to replication or pastiche.
 - The Juliet balconies at the new upper floor levels facing Raglan Street are similarly influenced by the arched façade openings below. When viewed from the street, the curved balcony forms echo the proportions of the lower-level arches, creating a visual continuity between the podium's solid masonry composition and the lighter upper levels. This relationship creates a more cohesive vertical rhythm, linking the

street-level articulation with the upper level components of the proposed additions.

- The proposed works are physically separated from the nearest heritage items and will not involve any alteration or impact to their fabric. The additional basement level will be subject to detailed structural design and shoring documentation by a qualified engineer to ensure that there is no adverse structural impact on adjoining properties within the Conservation Area.
- The proposed height increase will not obstruct significant public domain views to or from the identified heritage items within the Conservation Area. The orientation and alignment of the development remain consistent with the existing urban pattern established by the approved scheme.
- Under the Low and Mid-Rise Housing Policy and in-fill affordable housing provisions of the Housing SEPP, the surrounding precinct is expected to experience further mid-rise intensification, leading to a more diverse built form in the Sydney Metropolitan Area. The proposal represents a contextually appropriate transition between the fine-grained heritage fabric of the town centre and newer, higher-density development envisaged under current planning controls.

If you have any questions or require any further information, please do not hesitate to call me on 02 8076 5317.

Yours faithfully,



Patricia Sims | Director