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**Sent:** 9/10/2019 4:56:10 PM  
**Subject:** GBA Heritage submission for DA2019/0081  
**Attachments:** SoHI Issue for DA20190081\_GBA Heritage.pdf;

Dear Council and Ben,

**Re: DA2019/0081**

Please find attached the Statement of Heritage Impact from GBA Heritage on behalf of residents acutely concerned by the Development Application for 307 Sydney Road and 12 Boyle St, Balgowlah.

Kind regards,

Jane McKie  
8 Boyle St

4 October 2019

The General Manager  
Northern Beaches Council



Dear Sir/Madam

## **STATEMENT OF HERITAGE IMPACT PROPOSED DEVELOPMENT - DA2019/0081 307 SYDNEY ROAD & 12 BOYLE STREET, BALGOWLAH**

We have been requested by concerned residents to comment on a proposed development at the above address, a part of which has local heritage listing status. Our understanding is that Northern Beaches Council has requested the applicant to withdraw the DA due to issues of non-compliance.

Although the Council has stated that it cannot support the application in its current form, as per their correspondence of 4 July 2019, it would appear that this is for reasons other than heritage. This report evaluates the proposed works, provides an overview of the main heritage issues, and has concluded that there will be a substantial adverse heritage impact on the listed item.

### **METHODOLOGY AND STRUCTURE**

This Statement of Heritage Impact has been prepared in accordance with the guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as *The Burra Charter*, and the New South Wales Heritage Office (now Heritage, Department of Premier & Cabinet) publication, *NSW Heritage Manual*.

### **SITE IDENTIFICATION**

The subject development site comprises two properties; 307 Sydney Road, Balgowlah, located on the south side of Balgowlah Road, and 12 Boyle Street, located on the east side of Boyle Street. The two sites adjoin at the southern end of 307 Sydney Road.

### **ESTABLISHED SIGNIFICANCE OF THE SUBJECT SITE**

The subject site at 307 Sydney Road, Balgowlah, forms a part of a listed heritage item, 303, 305 and 307 Sydney Road, Balgowlah, in Schedule 5 of the *Manly Local Environmental Plan 2013*, as an item of local heritage significance (I24). The NSW Heritage Inventory (Database number: 2020520) provides the following Statement of Significance, under the listing title of 'Group of Houses':

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*Major significance as a fine example of thirties modern style architecture. Example of P&O style and moderne functionalist style.*

Council must take into consideration the potential impact of any proposed development on the heritage significance of heritage items, including under the heritage provisions of *Manly LEP 2013*, section 5.10 *Heritage Conservation*.

## **SITE DESCRIPTION AND CONTEXT**

The heritage listed site consists of three 'moderne' heritage residences of the Inter-war period:

- No. 303 Sydney Road presents as a single storey dwelling to the street.
- No. 305 Sydney Road on a 'battle-axe' block behind No. 303, and is a two storey flat building.
- No. 307 Sydney Road, also a 'battle-axe' block, a single storey dwelling to the east of No. 305.

The following physical description is provided by the NSW Heritage Inventory:

*Generally intact example of modern style architecture in rendered brick with flat roof. Significant and typical elements include the strong horizontal elements, notably bands of render; original glazing in fine leadlight; curvilinear form; entry porch and low front fence.*

The three dwellings form part of a group that clearly has a visual relationship to each other, based on the similar use of Inter-war design elements, and their proximity centred around a common driveway and landscaped 'common'.

## **THE PROPOSED DEVELOPMENT**

The proposed development consists of the following works:

- Demolition of the residence at 12 Boyle Street, as well as ancillary structures at 307 Sydney Road.
- Alterations to the heritage house at 307 Sydney Road, including the addition of a second storey to the existing single storey dwelling.
- The construction of a new two storey building to the north, and in front of the heritage building on the site.
- The construction of a new three storey building to the south, behind the heritage building on the site.
- The construction of a new two storey building fronting Boyle Street, and to the west of the heritage building on the site.

## **OVERVIEW ASSESSMENT OF HERITAGE IMPACT**

An assessment of heritage impact is required to take into account the heritage listing of the item as a 'Group of Houses', reflecting the significance of all three structures, and their interrelationship in terms of visual curtilage and sensitivity, one with the others. The Statement of Significance also indicates the importance of the heritage items as of 'Major significance ...' and it can be inferred that the three dwellings collectively have an elevated heritage significance as a group, more so than as single structures.

Further assessment is required by Council in terms of the following *Manly LEP 2013* provisions under 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,

On the basis of the above requirements we comment on the proposed development:

- The proposed second floor addition to the existing heritage dwelling at 307 Sydney Road, as illustrated, is completely incompatible with the original in terms of form, materials and colour. The presence of 'moderne' houses derives from their appearance as a modelled, single material of a usually light coloured form. The proposal adds a grey, metallic material at odds with the original design intent, and thus would remove an appreciation of what constitutes a 'moderne' design.
- The proposed placement of a new residential block to the north, in close proximity and directly in front of the heritage house, removes any visual curtilage of the item, compromises its heritage significance and its ability to be appreciated in its original garden setting.
- The placement of the new building disrupts the visual relationship between the three original buildings, including from the entrance driveway.

## CONCLUSIONS

- The proposed development does not conserve the environmental heritage of Manly, as the listing as a 'Group of Houses' would reduce its significance, and in particular the original single storey form of the heritage item at 307 Sydney Road.
- The proposed development does not conserve the heritage significance of the three buildings as a heritage item in terms of their important setting as a group.
- The proposed development does not maintain a curtilage for the heritage item at 307 Sydney Road, nor the views, both to and from each other.
- The proposed development is therefore, inconsistent with the heritage objectives of the *Manly LEP 2013*, and should not be permitted consent under clause 5.10.

## RECOMMENDATION

The consent authority is correct in requesting the application to be withdrawn and should not consider any approval of the development in its present form. Further, the Council should assess any future applications under the heritage provisions of the *Manly LEP 2013*, as referred to above.

Yours faithfully,  
GBA Heritage Pty Ltd



Garry McDonald  
Associate Director  
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