

## Heritage Referral Response

<b>Application Number:</b>	DA2022/2256
<b>Proposed Development:</b>	Demolition works and construction of a mixed use development with basement car parking.
<b>Date:</b>	25/05/2023
<b>To:</b>	Alex Keller
<b>Land to be developed (Address):</b>	Lot 100 DP 1009880 , 22 Raglan Street MANLY NSW 2095

### Officer comments

<b>HERITAGE COMMENTS</b>
<b>Discussion of reason for referral</b>
<p>The proposal has been referred to Heritage as the subject site is located within a conservation area and in the vicinity of a number of heritage items:</p> <p><b>C1 - Pittwater Road Conservation Area</b></p> <p><b>Item I254 - St Mary's Church, presbytery and school</b> - Whistler Street (corner Raglan Street), Manly</p> <p><b>Item I255 - Electricity substation No 15009</b> - 34A–36 Whistler Street, Manly</p> <p><b>Item I196 - Baby health care centre building</b> - 1 Pittwater Road, Manly</p>
<b>Details of heritage items affected</b>
<p>Details of the conservation area and the heritage items in the vicinity, as contained within the heritage inventory, are:</p> <p><b>C1 - Pittwater Road Conservation Area</b></p> <p><u>Statement of Significance</u></p> <p>This street pattern is distinctive and underpins the urban character of the area. The streets remain unaltered in their alignment, although the names of Malvern, Pine and North Steyne are now names for what were Whistler, Middle Harbour and East Steyne respectively.</p> <p><u>Physical Description</u></p> <p>The streetscape of Pittwater Road is a winding vista of late 19th and early 20th century commercial and residential architecture of generally one or two floors - although there are exceptions such as the four storey private hotel. The streetscape provides a 19th century atmosphere due to it's scale, width and the number of extant Victorian structures. Within the streetscape there are a number of individually significant buildings which are listed separately. Adjacent streets generally comprise a consistent pattern of one and two story residential cottages, with the occasional terrace. Some streets have intermittent street plantings and remnant stone kerbs. The flat topography is accentuated by the escarpment to the west which provides an important visual, vertical and vegetated backdrop.</p> <p><b>Item I254 - St Mary's Church, presbytery and school</b></p> <p><b>Item I255 - Electricity substation No 15009</b></p>

### Item I196 - Baby health care centre building

#### Other relevant heritage listings

Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	No	
Australian Heritage Register	No	
NSW State Heritage Register	No	
National Trust of Aust (NSW) Register	No	
RAIA Register of 20th Century Buildings of Significance	No	
Other	No	

#### Consideration of Application

The proposal seeks consent for the demolition of all the structures on the site and the construction of a four storey mixed use development with basement level parking. The subject site contains an Interwar Mediterranean building located in the western side of the site and is currently in use as a hostel along with the later additions, constructed in 2000, to the eastern side of the site. The original face-brick facade has been rendered and painted in the late 1990s. The original building- on the western lot is a contributory item within the HCA, featuring rendered masonry external walls, high pitch tiled roof at the street frontage and arched openings with pilasters to the first floor verandah. The original ambulance garage door has been infilled with glass panels/doors and the entry to the building is through these glazed doors. The original windows on this facade have been replaced with aluminum framed windows. Although, some original elements have been removed from the front facade, the original built form, including the roof line, the openings and the central verandah above the original ambulance garage entry, are still discernible.

Heritage considers that the subject original western building building is a contributory item to the conservation area and should be retained. In a conservation area contributory buildings should be retained including their original forms and features while later alterations and additions that detract from the building's contribution should be removed. Therefore, Heritage supports the demolition of the later addition at the eastern lot of the site subject to a respectful replacement building, but requires the retention of the of the original building at the western side.

The submitted HIS by Weir Phillips, classifies the subject building as "neutral" and states "Although it resembles its original form all of its key details which contribute to its heritage significance have been removed including the exposed face brick elevation to Raglan Street, fine brick detailing, timber framed windows and doors and terracotta tile roof". Heritage do not agree with this statement as the original building considered to contribute positively to the context as it retains the original built form and original fenestration/openings. The building is not considered to be classified as neutral but rather contributory.

The HIS also states that "The Manly Warringah District Ambulance Station had a simple and symmetrical elevation to Raglan Street and was representative of the Inter- War Stripped Classical Style." The original built form, roofline and openings of the former Ambulance Station building have not been altered and despite the damaged original fabric, the original built form and openings including the original central verandah with its metal balustrade and columns have been retained. Therefore, Heritage require the retention of the building with its original form, roof line and openings. It is considered that conserving this building will allow its positive contribution to the significance of the

HCA to continue.

Furthermore, the original building is considered to be classified as contributory rather than neutral as follows:

- The building is important in the course, or pattern, of New South Wales' cultural history, for being constructed as Manly's first purpose-built Ambulance Station in 1936, and had been used until December 1986.
- The building has strong or special association with the life or works of a person, or group of persons, of importance in New South Wales' cultural or natural history (or the cultural or natural history of the local area); as it was designed by Trenchard Smith and Maisey Architects, who also designed the Manly Town Hall.
- The building has potential to yield information that will contribute to an understanding of New South Wales' cultural history, as the original built form is still discernible and along with an interpretation plan would continue to contribute the HCA.

The HIS also states that "The site has a low level of integrity as the building has been substantially modified internally and externally from its original form and use as an Ambulance Station to accommodate adaptive reuse as a backpacker hostel". However, adaptive reuse is a form of known conservation method and it is not used for losing the heritage significance of a place but enabling the place to have ongoing, viable life that responds to the contemporary needs of the community and the subject building is able to demonstrate the key characteristics of its original form and fenestration/openings to the street frontage. Heritage conservation requires the retention of an appropriate visual setting that contributes to the significance of the HCA, and it is believed that, an appropriate restoration to its façade would enhance its ability to this contribution.

In the PLM/Heritage comments the recommendation was; to retain and restore the existing façade of the original building - western portion of the site; and to incorporate it into the new design. The applicant has not responded to these comments and the recommendations. It is also noted that, in the HIS submitted with this DA, the contribution of the original building to the HCA has been disregarded, and therefore the justification to the proposed demolition of the existing front facade is not considered to be sufficient.

The Burra Charter – the Australia ICOMOS charter for the conservation of places of cultural significance – is the key document guiding conservation practice in Australia. It states that: Conservation requires the retention of an appropriate visual setting and other relationships that contribute to the cultural significance of the place. New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate. (Article 8)

NSW Heritage Office & Royal Australian Institute of Architects NSW - Design in context: Guidelines for infill development in the historic environment - states that: "Designing in context does not mean imitation or following inflexible design rules. A wide range of solutions may emerge for any design problem after careful analysis of surrounding buildings and sympathetic interpretation of their design elements."

Heritage is also not supportive of the breaches of the height limit and the floor space ratio as they contribute to the building's poor relationship to the conservation area and emphasis its bulk and scale.

Therefore, Heritage cannot support the proposal in its current form and require amendments.

Consider against the provisions of CL5.10 of Manly LEP 2013.  
Is a Conservation Management Plan (CMP) Required? No  
Has a CMP been provided? No  
Is a Heritage Impact Statement required? Yes  
Has a Heritage Impact Statement been provided? Yes

The proposal is therefore unsupported.

Note: Should you have any concerns with the referral comments above, please discuss these with the Responsible Officer.

**Recommended Heritage Advisor Conditions:**

Nil.