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25 October 2022

Mr. R. Piggott
Manager, Development Assessment
Northern Beaches Council

Dear Mr. Piggott

DEVELOPMENT APPLICATION No: DA2022/0736 35 PINE STREET, MANLY.

I write in response to the heritage issues raised in your Request for Further Information dated 13 October, which reflect those raised in the Heritage Referral Response provided earlier.

That advice notes that the building's "streetscape presentation, in terms of the bulk and scale, is still discernible." That is true, but the form and detail of the façade are not. The upper veranda has been enclosed and the ground floor has been irreversibly altered. The building's contribution to the significance of the Conservation Area proposal is neutral, at best, while the ground floor considered as an element is clearly intrusive.

The proposal seeks to reverse this situation, to the extent which is feasible. The upper veranda enclosure is to be removed. Furthermore the roughcast render, which has been removed from the brick wall, is to be reinstated. This is supported by Council's heritage officer.

I agree also with the heritage officer's view that it would be preferable to reinstate the ground floor. But as explained in the Statement of Heritage Impact, much of the fabric was lost in the course of the alterations or otherwise, and there is no information about it in Council's files or elsewhere. Hence an authentic reconstruction is not possible, and the Burra Charter does not favour reliance on conjecture.

Given these constraints, I explored what appeared to be several options for an understated *interpretation* of the original form with the architect. But it proved impossible to provide the necessary off-street parking, as there simply is not enough space available for even an undersized vehicle to fit without overhanging the footpath. The suggested sliding gates would reduce the available space even further. Hence the only feasible solution is that proposed in the application.

I cannot agree with the contention that the garages will "dominate the streetscape." The eye will be drawn to the projecting central entry porch. The doors will be a recessive colour, with enough detailing to prevent their appearing as large openings.

As stated in the SOHI, the garage doors will be new elements. They use simplified traditional detailing and traditional proportions. It will be apparent, on close inspection, that they are not original, but sympathetic alterations. The design is consistent with the approach explained in the ICOMOS Practice Note on Article 22 –New Work.

In summary, while it would be ideal to further reinstate the ground floor, that is simply not feasible. But the proposal as submitted will clearly enhance the house's contribution to the significance of the Conservation Area, and to the streetscape. If the application were to be refused, that enhancement will not be possible and the building will remain intrusive.

Consequently, I submit that Council should consent to the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graham Hall', with a stylized, cursive script.

Graham Hall