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42 Glenmore Road Paddington NSW

Rodney Piggott
Manager, Development Assessment
Northern Beaches Council
PO Box 82 Manly NSW 1655

Attention: Stephanie Gelder

Dear Ms Gelder,

RE: 199-205 Pittwater Road Manly-DA2022/0193

This submission addresses the request for additional Heritage information in the letter from Northern Beaches Council dated 27 May 2022

As background Ruth Daniell is a specialist conservation architect with extensive experience in conservation and its management. Ruth has been involved in architectural projects, urban design projects, main street projects, conservation management plans and heritage impact assessments. Ruth has worked for local government at Woollahra Council as the Heritage Officer; and was the project director for the Paddington Development Control Plan and Waverley Council's Imperial Avenue DCP. Ruth has worked for State Government at the NSW Heritage Office. Ruth has a Bachelor of Laws degree.

The heritage request (No. 4) included:

"Heritage recommends considering reinstating the original wrap around verandah."

This submission examines the development of the building and the alterations to the building, the contribution of the building to the conservation area, and the surviving building fabric. An assessment using the NSW Heritage Office criteria and the Significance of the This submission also examines the proposal in the context of the Pittwater Road Conservation Area.

The Building

The building today is a degraded former commercial building with shopfronts on the ground floor and residential accommodation on the first floor level. The fenestration and openings on the ground floor have been altered in size location and detailing. The overall form of the building is visually evident. The parapet detail remains with a few missing elements.



This photograph shows the degree of alterations to the building. Both the ground floor and first floor facades have been extensively altered and contain building fabric of low significance. The parapet retains some of the original detailing. The parapet is the only stylistic element of the commercial building.

History of the Building

The building was constructed in 1914 as the Nixon Building known as Nixon's Corner.

A photograph dated 1937 shows a two storey wraparound verandah.

Alterations and additions to the building

- Date Unknown (Post 1937) - Removal of the two storey timber verandah. In the period from the 1930s-1950s verandahs were removed from commercial buildings in retail strips for a reasons including safety concerns arising from fear of collapse from motor vehicle collisions, a desire for modernity and more visible shopfronts. Municipal by-laws reinforced verandah removal. Occasionally an owner resisted. Awnings replace verandahs.
- Date Unknown - Addition of an awning structure (from physical evidence on the building facade of the awning points)
- 1997- Alterations and additions - Shops/Flats/Warehouse S96 382/1997
- 1998- Demolition & reconstruction of new concrete slab, etc
- 2013 - An addition o the rear of the site along Golf Parade, which is a separate building accessible from the corner building, where parking & 3 studio apartments have been built in 2003.

This is a record of the accessible DAs. The building fabric shows that the current state of he building is the result of a large number of incremental alterations

Contribution of the building to the Pittwater Road Conservation Area

In order to determine the contributory value the following assessment of significance is provided.

Assessment of Significance

The concept of 'cultural significance' or 'heritage value' recognises the value of a place or item, which cannot be expressed in monetary terms. Assessment of cultural significance attempts to establish the foundations on the basis of which a place or an item is valued by the community. Cultural significance is embodied in the fabric of the place, in it's setting and its relationship to other items, the records associated with the place and the response that the place evokes in the community.

Both the Burra Charter of Australia ICOMOS and its Guidelines for Assessment of Cultural Significance; and the NSW Heritage Manual prepared by the NSW Heritage Office recommends that significance be assessed in categories such as aesthetic, historic, scientific and social significance. The NSW Heritage Manual includes two additional criteria for assessing the comparative significance of an item.

Since the preparation of the NSW Heritage Manual, the NSW Heritage Act 1977 was amended in 1999, and again in 2000. Under this amendment the NSW Heritage Council has adopted revised criteria for assessment of heritage significance. The evaluation of cultural significance is based on the adopted approach and the results of the assessment are incorporated into a statement of significance, which is usually included in the inventory sheet of a heritage item.

A. HISTORICAL SIGNIFICANCE

An item is important in the course, or pattern, of the cultural or natural history of NSW; or of the local area's cultural or natural history.

No. 199-205 Pittwater Road is part of commercial development along Pittwater Road Manly, where commercial development was built to provide goods and services to the growing urban population along an established transport route.

Guidelines for Inclusion	
	Shows evidence of a significant human activity
	Is associated with a significant activity or historical phase
	Maintains or shows the continuity of a historical process or activity
Guidelines for Exclusion	
	Has incidental or unsubstantiated connections with historically important activities or processes
X	Provides evidence of activities or processes that are of dubious historical importance
X	Has been so altered that it can no longer provide evidence of a particular association well

Nos. 199-205 Pittwater Road does not importantly satisfy this criteria.

B ASSOCIATIVE SIGNIFICANCE

An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history; or of importance in the local area's cultural or natural history.

There are no relevant entries for owners of the property have been found in the Australian Dictionary of Biography, ANU, 2002, www.adb.online.anu.edu.au/adbonline.htm or A Biographical Register 1788-1939 ed. H.J. Gibbney and Ann Smith, 1987, Canberra, ADB.

Guidelines for Inclusion	
	Shows evidence of a significant human occupation
	Is associated with a significant event, person or group of persons
Guidelines for Exclusion	
	Has incidental or unsubstantiated connections with historically important people or events
X	Provides evidence of people or events that are of dubious historical importance
X	Has been so altered that it can no longer provide evidence of a particular association

Nos. 199-205 Pittwater Road fails to meet this criterion, as it is not directly or substantially associated with historically important persons in NSW.

C AESTHETIC SIGNIFICANCE

An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW; or in the local area.

Nos. 199-205 Pittwater Road is a very altered commercial corner building. It does not have the mark of a prominent architect or architectural practice.

Guidelines for Inclusion	
	Shows or is associated with, creative or technical innovation or achievement
	Is the inspiration for a creative or technical innovation or achievement
	Is aesthetically distinctive
	Has landmark qualities
	Exemplifies a particular taste, style or technology

Guidelines for Inclusion	
	Guidelines for Exclusion
	Is not a major work by an important designer or artist
X	Has lost its design or technical integrity
X	Its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded
	Has only a loose association with a creative or technical achievement

Nos. 199-205 Pittwater Road fails to meet this criterion.

D. SOCIAL SIGNIFICANCE

An item has strong or special associations with a particular community or cultural group in NSW; or in the local area for social, cultural or spiritual reasons.

The building is an ordinary residence in a typical suburban setting without associations to particular community groups or cultural groups.

Guidelines for Inclusion			
	Is important for its associations with an identifiable group		
	Is important to a community's sense of place		
	Guidelines for Exclusion		
	Is important to the community for amenity reasons		
X	Is retained only in preference to a proposed alternative		

Nos. 199-205 Pittwater Road fails to meet this criterion.

E RESEARCH POTENTIAL

An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history; or of the local area's cultural or natural history.

Nos. 199-205 Pittwater Road has no potential for yielding archaeological information relating to the development of the area as it appears to be the first building constructed on the site. Nos. 199-205 Pittwater Road is a standard type of construction and will not yield new or important information that is not available elsewhere.

Guidelines for Inclusion	
	Has the potential to yield new or further substantial scientific and/or archaeological information
	Is an important benchmark or reference site or type
	Provides evidence of past human cultures that is unavailable elsewhere
Guidelines for Exclusion	
	The knowledge gained would be irrelevant to research on science, human history or culture
	Only contains information that is readily available from other resources or archaeological sites
X	Has little archaeological or research potential

Nos. 199-205 Pittwater Road fails to meet this criterion.

RARITY

An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history; or of the local area's cultural or natural history.

Nos. 199-205 Pittwater Road is not a rare example of its kind locally or in NSW.

Guidelines for Inclusion	
	Provides evidence of a defunct custom, way of life or process
	Demonstrates a process, custom or other human activity that is in danger of being lost
	Shows unusually accurate evidence of a significant human activity
	Is the only example of its type
	Demonstrates designs or techniques of exceptional interest
	Shows rare evidence of a significant human activity important to a community

Guidelines for Inclusion	
	Guidelines for Exclusion
X	Is not rare
	Is numerous, but under threat

Nos. 199-205 Pittwater Road fails to meet this criterion.

G REPRESENTATIVE

An item is important in demonstrating the principal characteristics of a class of NSW's; or of the local area's - cultural or natural places; or - cultural or natural environments.

The building does not demonstrate characteristics of any style in particular.

Guidelines for Inclusion	
	Is a fine example of its type
	Has the principal characteristics of an important class or groups of items
	Has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity
	Is a significant variation to a class of items
	Is part of a group which collectively illustrates a representative type
	Is outstanding because of its setting, condition or size
	Is outstanding because of its integrity or the esteem in which it is held
	Guidelines for Exclusion
X	Is a poor example of its type
	Does not include or has lost the range of characteristics that make up a significant variation of its type

Nos. 199-205 Pittwater Road fails to meet the criterion for inclusion.

Statement of Significance for Nos. 199-205 Pittwater Road

Nos. 199-205 Pittwater Road does not satisfy the heritage assessment criteria for heritage listing as it fails to demonstrate importantly the assessment criteria to the level required.

Statement of Significance for the Pittwater Road Conservation Area

The Pittwater Road Conservation Area street pattern is distinctive and underpins the urban character of the area. This street pattern comprises the alignment, detailing and silhouette of the street facades and the overall scale of building in Pittwater Road is important. 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. In particular, the streetscape along Pittwater Road from Dennison Road to Collingwood Street is a fine example of a remaining vista of the early settlement period in the Municipality specifically its scale and architectural interest and mixed use and for its association with the tram route and the major northern transport route.

Nos. 199-205 Pittwater Road has limited value in the Significance of the Conservation Area for its form only.

The Definition of a Contributory Building

A contributory building is:

A contributory heritage place is important for its contribution to a heritage precinct. It is of historic, aesthetic, scientific, social or spiritual significance to the heritage precinct. A contributory heritage place may be valued by the community; a representative example of a place type, period or style; and/or combines with other visually or stylistically related places to demonstrate the historic development of a heritage precinct. Contributory places are typically externally intact, but may have visible changes which do not detract from the contribution to the heritage precinct.

The assessment of significance for Nos. 199-205 Pittwater Road indicates that the building does not have important historic, aesthetic, scientific, social or spiritual significance. The building at Nos. 199-205 Pittwater Road does not contribute importantly to the Pittwater Road Conservation Area as the building does not contribute in terms of detailing and integrity. It is not valued by the community as an example of an early 20th century building because it is not a representative example of a "a place type, period or style; and/or combines with other visually or stylistically related places to demonstrate the historic development of a heritage precinct."

Adaptation

The Burra Charter defines 'adaptation' as "Adaptation means changing a place to suit the existing use or a proposed use."

The Burra Charter states:

"5.2 Relative degrees of cultural significance may lead to different conservation actions at a place."

It is generally accepted that the building fabric of low significance, including altered building fabric can be altered. No. 199-205 Pittwater Road apart from its form is a substantially altered building and as such it is an opportunity for "adaptation". The non contributory character of the building provides the opportunity for an adaptive design approach that retains the building form and the parapet.

The location of the building in the Pittwater Conservation Area supports "adaptation" as the building is not part of a row or a group of buildings.

Contributory commercial buildings to the Conservation Area are in contiguous rows and retain original details as shown in the following photograph.



View of the commercial buildings in a contiguous row with original detail between Golf Parade and Rolfe Street.

The Proposal for a Wrap around Verandah

The proposal for a wrap around verandah has been influenced by the historic photograph of the building in the 1930s. While it shows detail of the verandah and a limited number of first floor openings it does not provide comprehensive evidence for the total original design of the building. The Burra Charter states in Article 1.8 "Reconstruction means returning a place to a known earlier state and is distinguished from restoration by the introduction of new material", which In my opinion this is not a reasonable proposal because the building has been so altered and the evidence for reconstruction is not based on known evidence.

If the building had a high degree of intact fabric including original openings and details, intact internal fabric supporting the position of the openings the argument for a verandah reconstruction would have validity and could be considered. However, due to the lack of evidence for the original design of the building, the small amount of original building fabric, the inability of the building to contribute to the significance of the Pittwater Road Heritage Conservation Area in my professional opinion the verandah reconstruction in my professional opinion is not a proposal that can be supported.

Adaption proposed in the DA

For the reasons set out in this submission, including the degree of previous alterations to the building, the assessed significance, its lack of contribution to the Conservation Area and the lack of solid evidence for reconstruction I support an adaptation that retains the building form, restores the parapet, that employs good contemporary design is the preferable over a historicist conjectural reproduction of the original commercial building designed in 1914.

Please contact me if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Ian Daniell". The signature is stylized, with a large, sweeping loop at the end of the last name.