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HERITAGE IMPACT STATEMENT

35-43 Belgrave Street, Manly
Guringai Land

Prepared for
TIME&PLACE
11 July 2023

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EXECUTIVE SUMMARY

Urbis has been engaged to prepare this Heritage Impact Statement (HIS) related to a proposed development at 35-43 Belgrave Street, Manly (the subject site).

- 35-39 Belgrave Street (CP/SP14133)
- 40 Belgrave Street (Lot 1/DP100633)
- 41 Belgrave Street (Lot 1/DP104766)
- 42 & 43 Belgrave Street (Lot 1/DP34395 & Lot 1/DP719821, respectively) – note that there is a single building at these 2 individual addresses

This HIS is required due to the site's location in the vicinity of the following heritage items and Heritage Conservation Areas which are listed under Schedule 5 of the Manly Local Environmental Plan 2013 (LEP):

- *Ivanhoe Park*, Ivanhoe Park (bounded by Sydney Road, Belgrave Street and Raglan Street) (Local significance, I162)¹
- *Electricity substation No 15009*, 34A–36 Whistler Street (State significance, I255)²
- *St Mary's Church, presbytery and school*, Whistler Street (corner Raglan Street) (local significance, I254)
- *Baby health care centre building*, 1 Pittwater Road (local significance, I196)
- *Pittwater Road Conservation Area* (local significance, C1)
- *Town Centre Conservation Area* (local significance, C2)

This HIS carries out an assessment of the potential heritage significance of the existing, Inter-War commercial building at 35-39 Belgrave Street in Section 4. The assessment finds that the building does not meet the threshold for individual listing.

An assessment of the proposed development against the applicable heritage-related provisions of the Manly LEP 2013 and the Manly Development Control Plan 2013 is carried out in Section 5 of this HIS. The assessment finds that:

- The proposed demolition of the existing building at 35-39 Belgrave Street will not generate any adverse heritage impacts, owing to its lack of assessed heritage significance.
- The subject site is located with sufficient distance from nearby heritage items so as to fully maintain their legibility and interpretability. While the site has an interface, at Whistler Street, with the listed substation building, the development of other new buildings of similar or taller scale along this frontage will mean that the development which is the subject of this HIS will not result in further impacts to this building.
- The development will not result in any shadow impacts to the LEP- and SHR-listed Ivanhoe Park opposite the site, thereby not resulting in any adverse impacts to this highly significant public open space.
- The development will result in a high-quality contemporary architectural expression befitting the importance of the Manly town centre. Making use of high-quality materials and well-resolved detailing (including the vaulted roofline), the development presents an opportunity to mark a new gateway site into Manly's town centre proper while having due regard for its local context.
- The introduction of a new infill building of high architectural quality on the site will result in a vastly improved interface with nearby heritage items and the Pittwater Road HCA that what is currently present.

The proposed development will, therefore, not generate any adverse heritage impacts and is recommended for approval from a heritage perspective.

¹ This item is also listed on the NSW State Heritage Register (SHR 02029).

² This item is also listed on the NSW State Heritage Register (SHR 00938).

1. INTRODUCTION

1.1. BACKGROUND & PURPOSE

Urbis has been engaged to prepare this Heritage Impact Statement (HIS) related to a proposed development at 35-43 Belgrave Street, Manly (the subject site). This HIS is required owing to the heritage context of the site (discussed below) and will discuss the potential heritage impacts of the proposed development pursuant to the provisions of the *Manly Local Environmental Plan 2013* (LEP).

This HIS is required pursuant to the provisions of the Manly LEP 2013, which state that the consent authority must consider the impact of proposed development on the heritage significance of listed heritage items and Heritage Conservation Areas (HCAs) in the vicinity of proposed development. This HIS will also consider the potential heritage significance of the building located at 35-39 Belgrave Street, which forms part of the development site, following a request from Northern Beaches Council's heritage officer in a pre-application meeting to assess the potential significance of that particular building.

1.2. SITE IDENTIFICATION

The site comprises five (5) individual properties, identified below:

- 35-39 Belgrave Street (CP/SP14133)
- 40 Belgrave Street (Lot 1/DP100633)
- 41 Belgrave Street (Lot 1/DP104766)
- 42 & 43 Belgrave Street (Lot 1/DP34395 & Lot 1/DP719821, respectively) – note that there is a single building at these 2 individual addresses

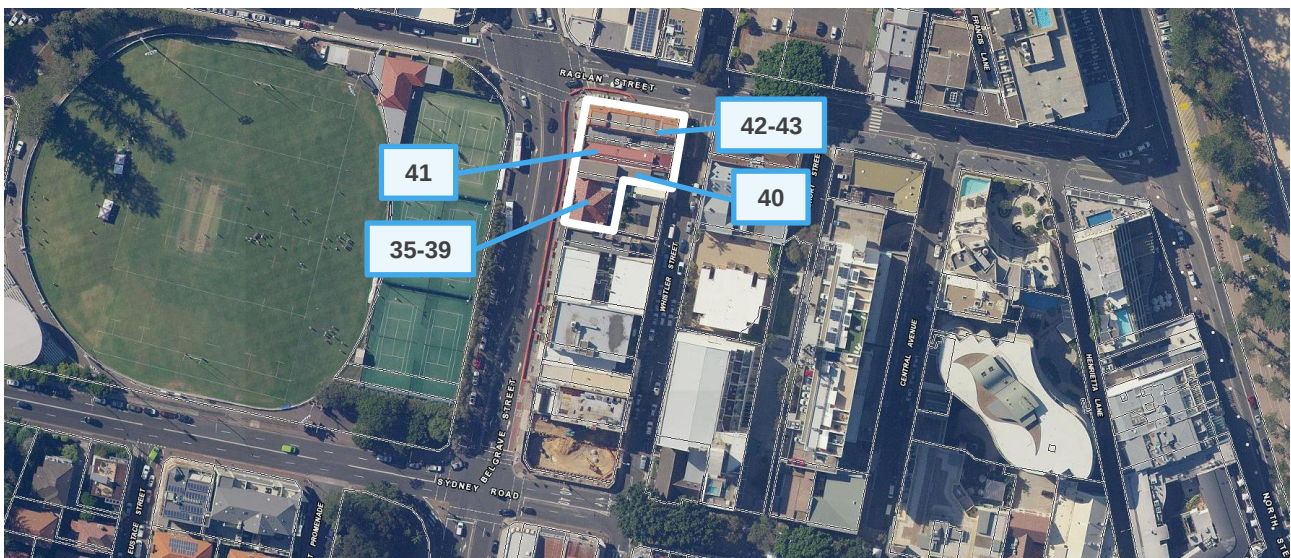


Figure 1 – Aerial of locality, with subject site indicated
Source: SIX Maps, 2023, with Urbis overlay

1.3. HERITAGE CONTEXT

1.3.1. Heritage listings

There are no heritage listings applicable to the site.

1.3.2. Heritage Conservation Area

The site is not located within the boundaries of any Heritage Conservation Area (HCA).

1.3.3. Heritage items & HCAs in the vicinity

The site is situated in the vicinity of the following heritage items and HCAs, as listed under Schedule 5 of the Manly LEP 2013:

- *Ivanhoe Park*, Ivanhoe Park (bounded by Sydney Road, Belgrave Street and Raglan Street) (Local significance, I162)³
- *Electricity substation No 15009*, 34A–36 Whistler Street (State significance, I255)⁴
- *St Mary's Church, presbytery and school*, Whistler Street (corner Raglan Street) (local significance, I254)
- *Baby health care centre building*, 1 Pittwater Road (local significance, I196)
- *Pittwater Road Conservation Area* (local significance, C1)
- *Town Centre Conservation Area* (local significance, C2)

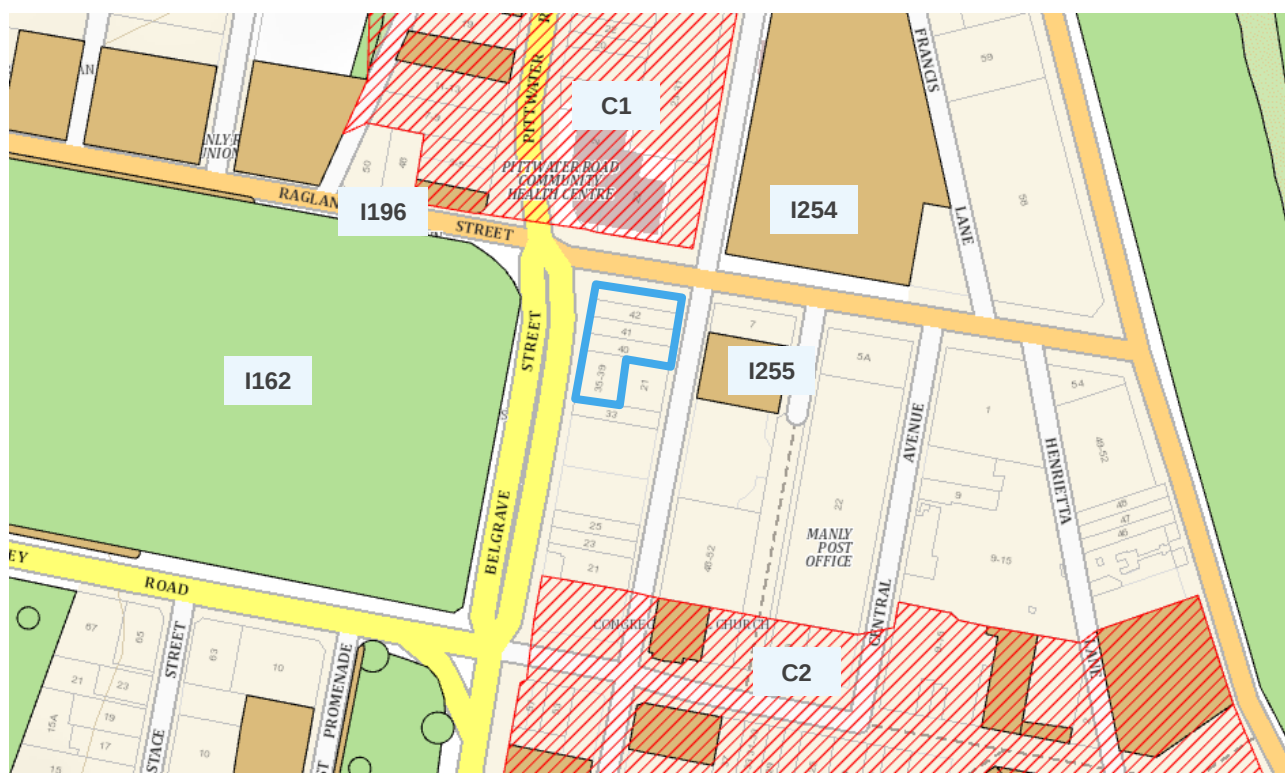


Figure 2 – Aerial of locality, with subject site indicated
Source: SIX Maps, 2023, with Urbis overlay

1.4. METHODOLOGY

This HIS has been prepared in accordance with the NSW Heritage guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by the Australia ICOMOS *Burra Charter* 1999 (revised 2013).

Site constraints and opportunities have been considered with reference to relevant controls and provisions contained within the Manly LEP 2013 and the Manly Development Control Plan 2013 (DCP).

Historical research has been undertaken for the subject site only as it relates to the property at 35-39 Belgrave Street, in order to inform an assessment of the building's potential heritage significance as requested by Northern Beaches Council. The history and potential significance of the other buildings on the site is not considered in this HIS, as only 35-39 Belgrave Street was discussed between the applicant and Council.

³ This item is also listed on the NSW State Heritage Register (SHR 02029).

⁴ This item is also listed on the NSW State Heritage Register (SHR 00938).

1.5. AUTHORSHIP

This HIS has been prepared by Oliver Lennon (Assistant) and Anthony Kiliyas (Senior Consultant). It has been reviewed and endorsed by Ashleigh Persian (Associate Director).

1.6. THE PROPOSAL

The proposal entails the demolition of the existing buildings on the site, and the development of a new 5-storey, mixed-use building incorporating ground-floor commercial tenancies and residential apartments at levels above. The development will also include 2 levels of basement carparking / plant under the building.

The proposal is shown in drawings prepared for the development application by SJB, as listed in the table below. Photomontages from the drawing set have been reproduced in small scale below for reference purposes; for details, the full set of drawings submitted with the application should be referred to.

Table 1 – Architectural plans

Drawing no.	Title	Revision	Date
DA-0000	Cover	-	28.06.2023
DA-0101	Location plan	1	28.06.2023
DA-0103	Site plan & Site analysis	6	28.06.2023
DA-0110	Floor plan – Basement 2	7	28.06.2023
DA-0111	Floor plan – Basement 1	8	28.06.2023
DA-0112	Floor plan – Ground	8	28.06.2023
DA-0113	Floor plan – Level 1	8	28.06.2023
DA-0114	Floor plan – Level 2	4	28.06.2023
DA-0115	Floor plan – Level 3	4	28.06.2023
DA-0116	Floor plan – Level 4	7	28.06.2023
DA-0117	Floor plan – Roof	6	28.06.2023
DA-1401	Elevation north	3	28.06.2023
DA-1402	Elevation east	3	28.06.2023
DA-1403	Elevation south	3	28.06.2023
DA-1404	Elevation west	2	28.06.2023
DA-1410	Streetscape elevation	5	28.06.2023
DA-1501	Section A-A	7	28.06.2023
DA-1502	Section B-B	2	28.06.2023
DA-2510	3D height plan diagram	3	28.06.2023
DA-4400	Apartment plan – Adaptable unit – Sheet 1	1	28.06.2023

Drawing no.	Title	Revision	Date
DA-4401	Apartment plan – Adaptable unit – Sheet 2	1	28.06.2023
DA-6020	Shadow diagrams (winter solstice) 9am	1	28.06.2023
DA-6021	Shadow diagrams (winter solstice) 12pm	1	28.06.2023
DA-6022	Shadow diagrams (winter solstice) 3pm	1	28.06.2023
DA-6030	Views from the sun (winter solstice) – Sheet 1	2	28.06.2023
DA-6031	Views from the sun (winter solstice) – Sheet 2	1	28.06.2023
DA-6032	Views from the sun (winter solstice) – Sheet 3	1	28.06.2023
DA-6033	Views from the sun (winter solstice) – Sheet 4	1	28.06.2023
DA-6040	Solar compliance	1	28.06.2023
DA-6041	Cross ventilation compliance	1	28.06.2023
DA-6101	Area plans GFA	3	28.06.2023
DA-6601	Photomontage – View from Belgrave St	3	28.06.2023
DA-6602	Photomontage – View from Whistler St	3	28.06.2023
DA-6603	Photomontage – View from Manly Oval	1	28.06.2023
DA-6610	External finishes	1	28.06.2023



Figure 3 – Perspective view of proposed development, facing south-east at intersection of Belgrave and Raglan Streets
Source: SJB, July 2023



Figure 4 – Perspective view of proposed development, facing south-west at intersection of Raglan and Whistler Streets
Source: SJB, July 2023



Figure 5 – Perspective view of proposed development, facing north along Belgrave Street
Source: SJB, July 2023

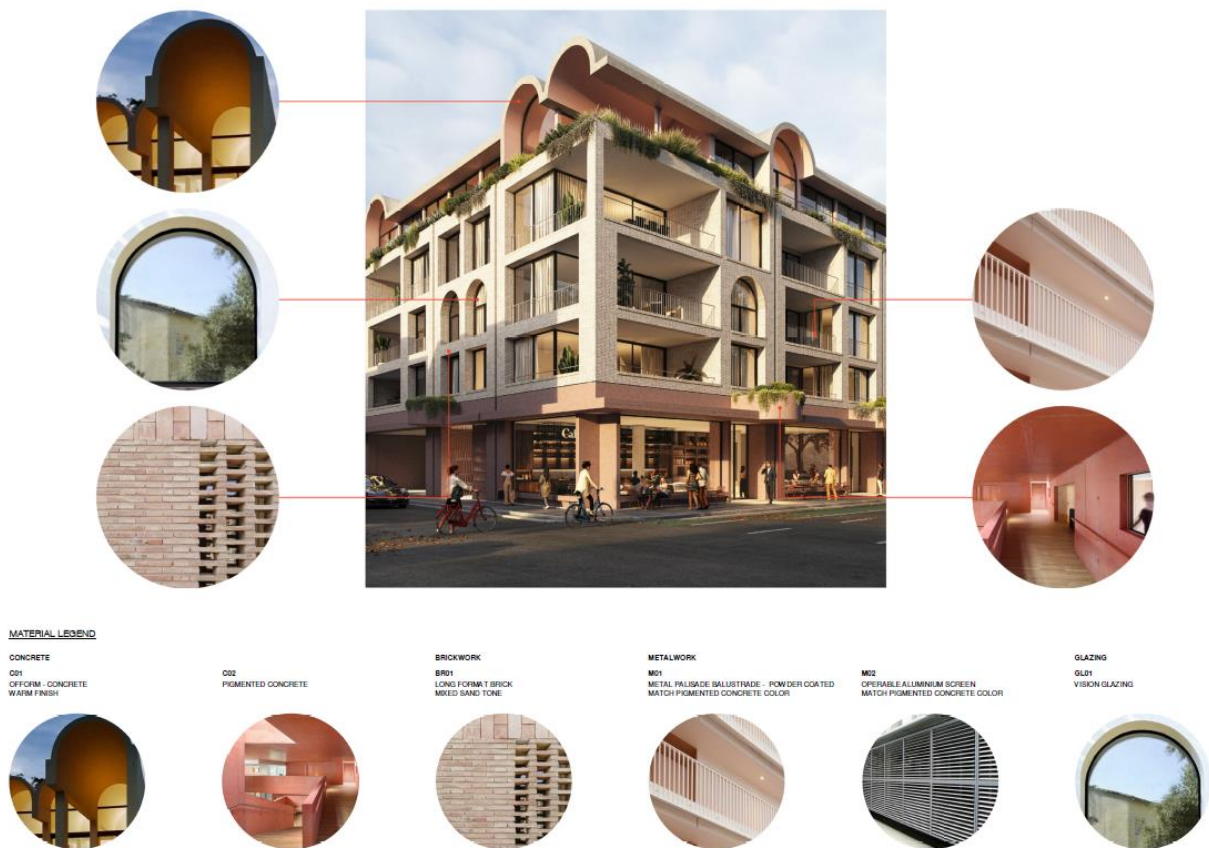


Figure 6 – External finishes
Source: SJB, July 2023

2. HISTORICAL OVERVIEW

2.1. AREA HISTORY

The following area history is sourced from a Conservation Management Plan prepared by GML Heritage in 2021 for Ivanhoe Park,⁵ with additional contributions from Urbis.

2.1.1. Aboriginal Country: The Early Colonial Period and Ongoing Connections

Aboriginal people have lived in Australia for at least 60,000 years. Hundreds of generations of coastal Aboriginal people witnessed the rising waters through the Holocene, with the greatest rise occurring around 6,000 years ago as water filled the valley of what became Sydney Harbour.⁶ The present shoreline of the Northern Beaches was formed at this time. Drowned sandstone valleys formed into lagoons and other estuaries while erosion shaped headlands, beaches and sand dune systems. Aboriginal people took advantage of this new shoreline with access to an abundance of marine food and resources. Evidence of the shellfish diet can still be found in large midden sites around the North Head peninsula and the greater Manly area.⁷

Approximately 1,500 years ago trade networks shifted south and north along the coast, rather than inland. New fishing technologies were developed in response, with the development of bone barbs to tip fishing spears and fishing hooks adapted from shell and the use of locally available quartz stone.⁸ Aboriginal mastery of fishing and navigating the harbour waters was recorded with awe by Europeans who observed the diving skills of men and women:

“Getting onto the rocks that projected into the sea, they plunged from them to the bottom in search of shellfish. When they had been down for some time, we became very uneasy on their account ... At length, however, they appeared, and convinced us that they were capable of remaining underwater twice as long as our ablest divers ... They did this repeatedly until their baskets were nearly full.”⁹

The landscape of the Northern Beaches was shaped by Aboriginal land management practices, with controlled fire used to clear country for hunting and attract kangaroos, wallabies and other game. The cleared space also made travel easier and encouraged growth of root vegetables like yams and grass seeds. The seeds were ground into a flour for a type of pancake and sometimes mixed with plant roots. The cultivated look of this area led the Europeans to mistakenly believe they had discovered pastures ‘very proper for cultivation.’

The rich cultural and spiritual life of coastal Aboriginal people was not just performed through song, dance and oral traditions but also etched into the landscape itself. Carvings on rock platforms and walls were noted by Europeans as ‘proofs of their ingenuity in the...representations of themselves in different attitudes, of their canoes, of several sorts of fish and animals...’¹⁰ Rock art engravings in the Northern Beaches remain some of the most outstanding examples in Sydney.¹¹

⁵ Ivanhoe Park, Manly, Conservation Management Plan, prepared by GML Heritage for Northern Beaches Council, 2021.

⁶ Irish, P 2019, ‘Aboriginal Paddington’ in Young, G (ed), Paddington: A History, New South and The Paddington Society, page 19.

⁷ Attenbrow, V 1991, ‘Port Jackson Archaeological Project: A Study of the Prehistory of the Port Jackson Catchment, New South Wales, Stage I — Site Recording and Site Assessment’, Australian Aboriginal Studies, no 2.; Attenbrow, V 2010, Sydney’s Aboriginal Past: Investigating the Archaeological and Historical Records, University of New South Wales Press, Kensington, NSW.

⁸ Irish, P 2017, Hidden in Plain View: The Aboriginal People of Coastal Sydney, NewSouth, pp 13–17. Attenbrow, V, Aboriginal Fishing in Port Jackson, and the Introduction of Shell Fish-Hooks to Coastal NSW, report prepared for Australian Museum, April 2010.

⁹ Ogden, J 2011, Saltwater People of the Broken Bays, Cyclops Press, p 28.

¹⁰ Arthur Phillip, as quoted in Barrenjoey Peninsula and Pittwater Heritage Study, 1988, page 69.

¹¹ Ivanhoe Park, Manly, Conservation Management Plan, prepared by GML Heritage for Northern Beaches Council, 2021.

2.1.2. Contact, and the emergence of Manly

The first European contact in the Manly area was on January 22, 1788 when Governor Phillip scouted the cove for a landing site for the First Fleet. He wrote, “*The boats....were seen by a number of men and twenty of them waded into the water unarmed, received what was offered them and examined the boats with a curiosity that gave me a higher opinion of them than I had formed from the behaviour of those seen in Captain Cook’s voyage. Their confidence and manly behaviour made me give the name of Manly Cove to this place.*”¹² Land began to be granted in 1810, first to Richard Cheers and Gilbert Baker, then D’Arcy Wentworth in 1818 with a 380-acre grant.

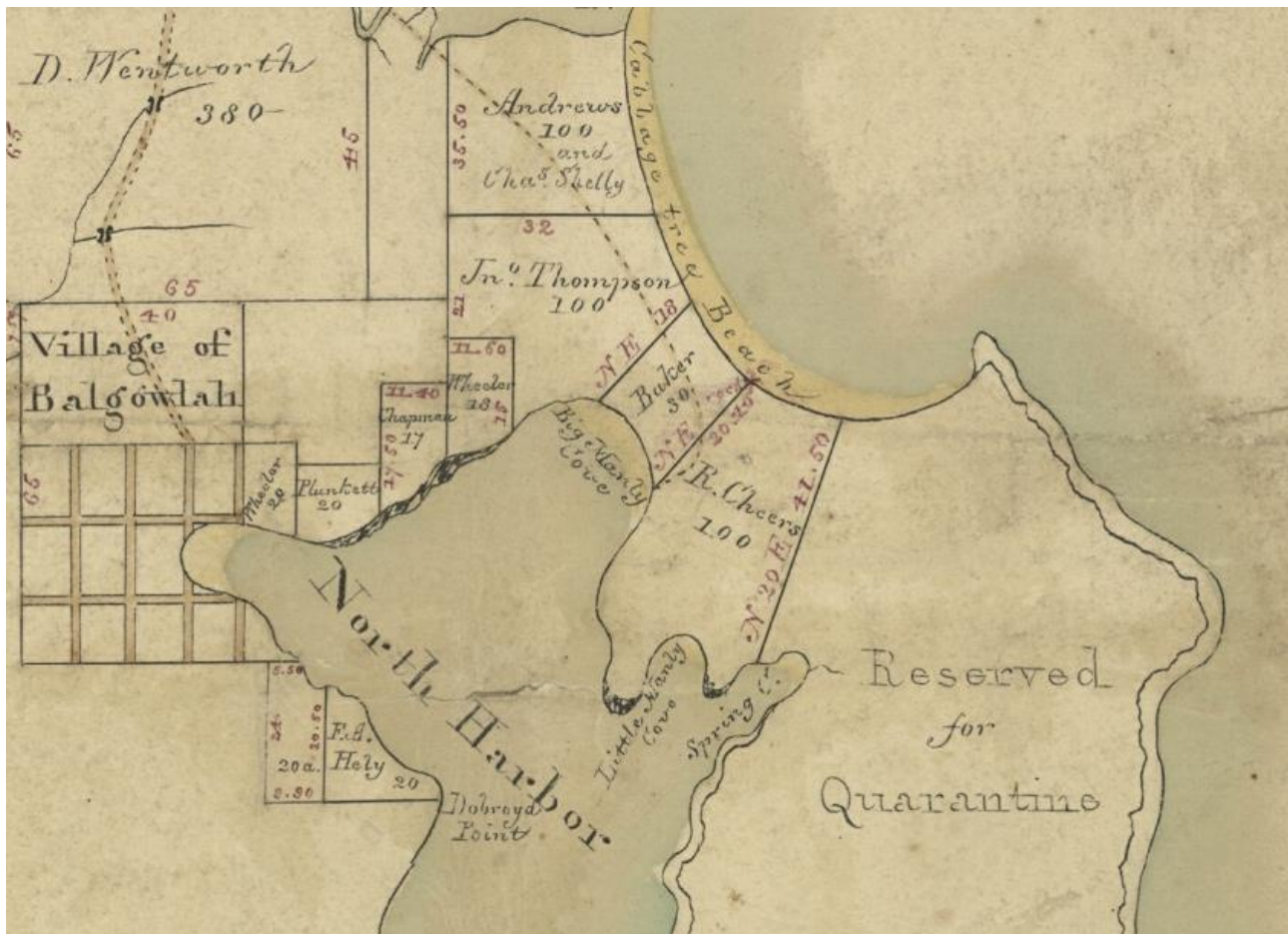


Figure 7 – Extract of a map of the coastal area between Broken Bay and Middle Harbour, showing the land grants in the undeveloped area that would become Manly. The subject site lay in the grant of Thompson.

Source: State Library of NSW, accessed at <https://collection.sl.nsw.gov.au/record/74VKOQjE8Koy>

Manly had previously been remote to the colony, but as settlement spread out from Sydney, the area began to see settlement in the 1830s. This was a slow process, with the 1841 Census only recording 29 residents of the former Manly Local Government Area:

*“In the early days of white settlement, most colonists, apart from a handful of fisherman and farmers, ignored the district and it was 65 years before a nucleus of a village began to develop on the sandy flat isthmus. For a further 40 years this village, linked to the city by the solidary thread of the ferry service remained mostly quiet and isolated, except at holiday time when visitors poured off the ferries and surged over the sand.”*¹³

¹² Phillip, A 1789, *The Voyage of Governor Phillip to Botany Bay with an Account of the Establishment of the Colonies of Port Jackson and Norfolk Island*; compiled from Authentic Papers ..., printed for John Stockdale, Piccadilly, London, available via Project Gutenberg Australia, viewed 23 June 2023
<<http://gutenberg.net.au/ebooks/e00101.html>>.

¹³ Curby, P 2001, *Seven Miles from Sydney: A History of Manly*, Manly Council, Manly, page 16.

This changed with land speculator and property developer Henry Gilbert Smith, who saw the potential of Manly as a seaside town, writing: "its situation, seven or eight miles from Sydney by water, is as fine a thing as you can imagine and it takes in the only ground which has the sea beach on one side and a fine sandy cove on the other." He began purchasing and leasing land from 1853, the ferry service commenced in 1855, and he built several homes and a hotel near the pier that same year. In 1855 Smith commissioned the Ellensville plan, laying out a vision for the development of the area, including the Corso, and land that would become the beachfront and Ivanhoe Park. This plan was different to the town that ultimately emerged, particularly south of the Corso, but was similar in its objective of exploiting the beachfront and featuring parkland, and some streets remain in the modern geography. In 1858, the subdivision name was changed to Brighton Estate.



Figure 8 – 1855 Ellensville Plan for Manly

Source: State Library of NSW, accessed at https://files02.sl.nsw.gov.au/fotoweb/public_archive/7675/76751230.jpg

Growth remained slow in a town promoted as a health resort, and primarily attracted wealthy settlers. In January 1877, the Municipality of Manly was incorporated, and the Council invested in improving infrastructure to attract growth. Roads, paving and guttering, sewage and gasworks were invested in, and the Port Jackson Steamship Company formed in 1881 providing regular ferry service to Circular Quay. This gave the town access to the city for its population, making it more viable for workers. By the early twentieth century, was a growing suburb whose old estates declined and were subdivided not building lots. The population rose from 5,000 in 1901 to 18,000 in 1921 and 33,500 in 1947, and this brought with it development of apartments and dense commercial space.



Figure 9 – Belgrave Street in the 1880s

Source: *Belgrave Street*. Northern Beaches Council Library Local Studies. Accessed at <https://northernbeaches.recollect.net.au/nodes/view/10537?keywords="35%20belgrave"&highlights=WYjZiZWxncmF2ZSjd>

Belgrave Street previously extended along present-day Pittwater Road, and in the 19th century, modern-day Belgrave Street was known as East Promenade. It was featured in the 1855 subdivision, and populated with a boarding house by 1861. Photographic evidence from the 1880s shows Belgrave Street and the surrounding area dominated by cottages, a boarding house and the first St Matthew's Church in the Corso. The area was in the process of being built up over the late nineteenth and early twentieth century. In 1890 it was dominated by Restormel and Seaforth residences, and a Post Office. Over the early twentieth century, it saw transformation into a commercial and public space, with such key development as a Court House erected in 1923, a Police Station in 1924 and theatre in 1935.¹⁴ The tramline in Manly passed along Belgrave Street during its tenure.

¹⁴ 'Belgrave Street' study, Northern Beaches Library Services History Hub, accessed at <https://northernbeaches.recollect.net.au/nodes/view/10537?keywords="35%20belgrave"&highlights=WYjZiZWxncmF2ZSjd>

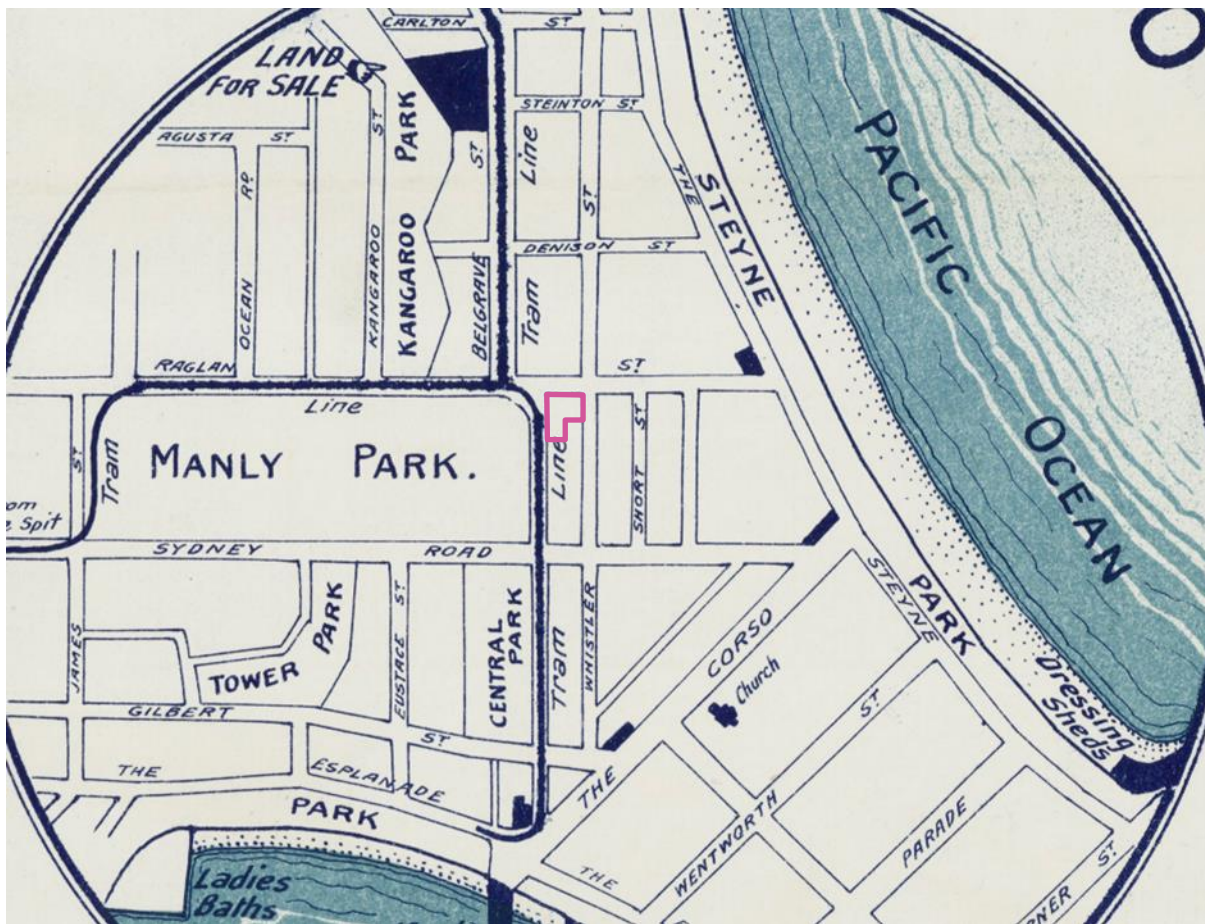


Figure 10 – Extract of 1917 Manly Undercliffe Estate subdivision plan, with approximate location of subject site indicated
Source: 007 - SP/M5/7 - Manly Undercliff Estate - Kangaroo Park, Belgrave St, 1917, of Manly Subdivision plans accessed at <https://collection.sl.nsw.gov.au/record/74Vvdye3DM2Z/7qAkoDq5DWvvM>, with Urbis overlay

2.2. 35-39 BELGRAVE STREET

Part of the 100-acre parcel of land granted to John Thompson in 1842, then sold to Gilbert Smith, the history of the subject site is linked to the history of the adjoining Lot at 21 Whistler Street, Manly. The site was part of a collection of Lots (Lots 8, 9, 10 and 11) on Brighton Estate that traded with Application 18475, in the context of Manly's growth and development. The Lots moved ownership in their early years, and Lots 8 and 9 were in the hands of Thomas and Charlotte Rowe by 1875.¹⁵

¹⁵ NSW Historical Lands Records Viewer, Primary Application Number 18475.

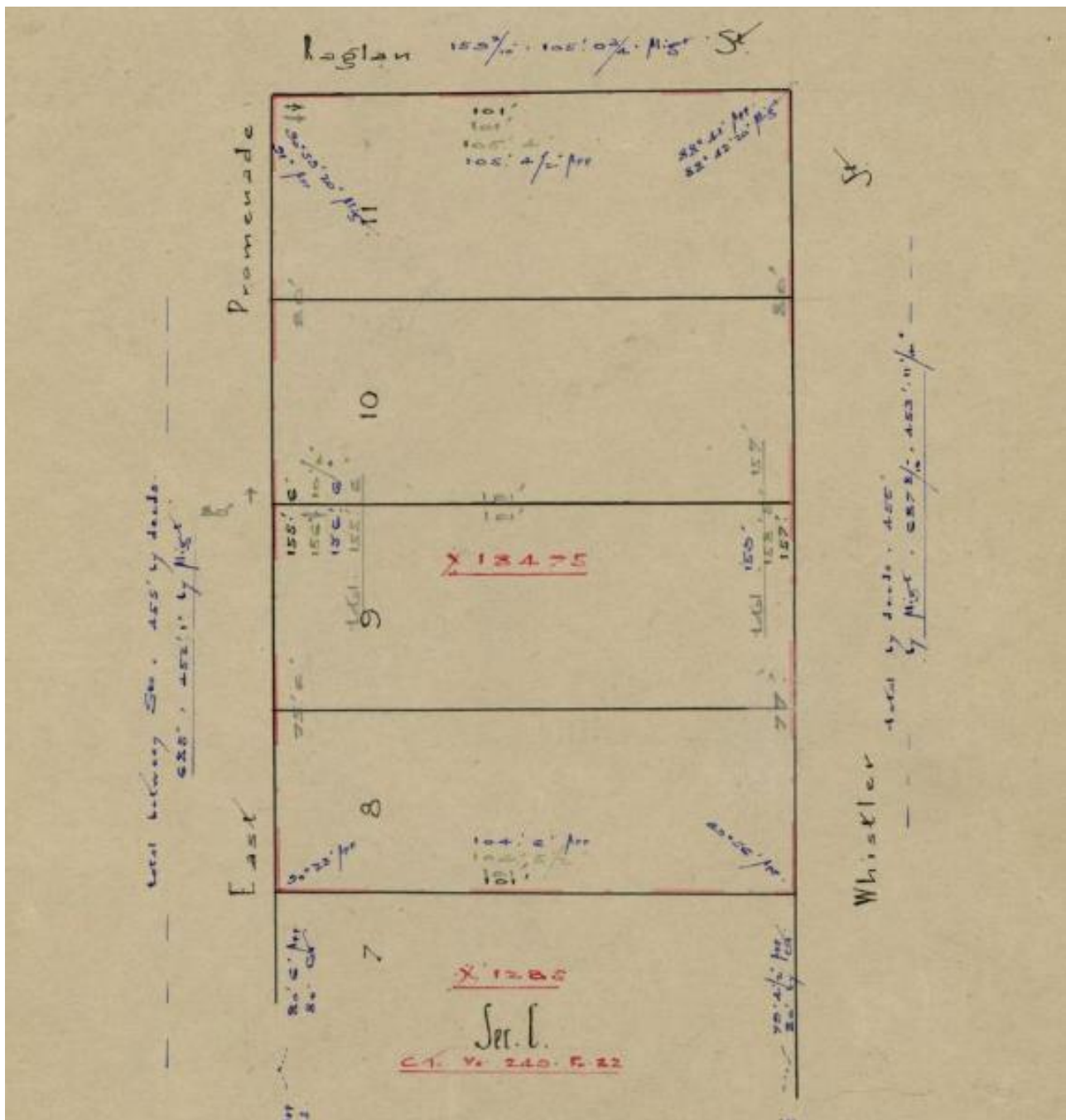


Figure 11 – Map of the land traded with Primary Application 18475. The future subject site lay on Lots 8 and 9.
Source: NSW Historical Lands Records Viewer, Primary Application Number 18475

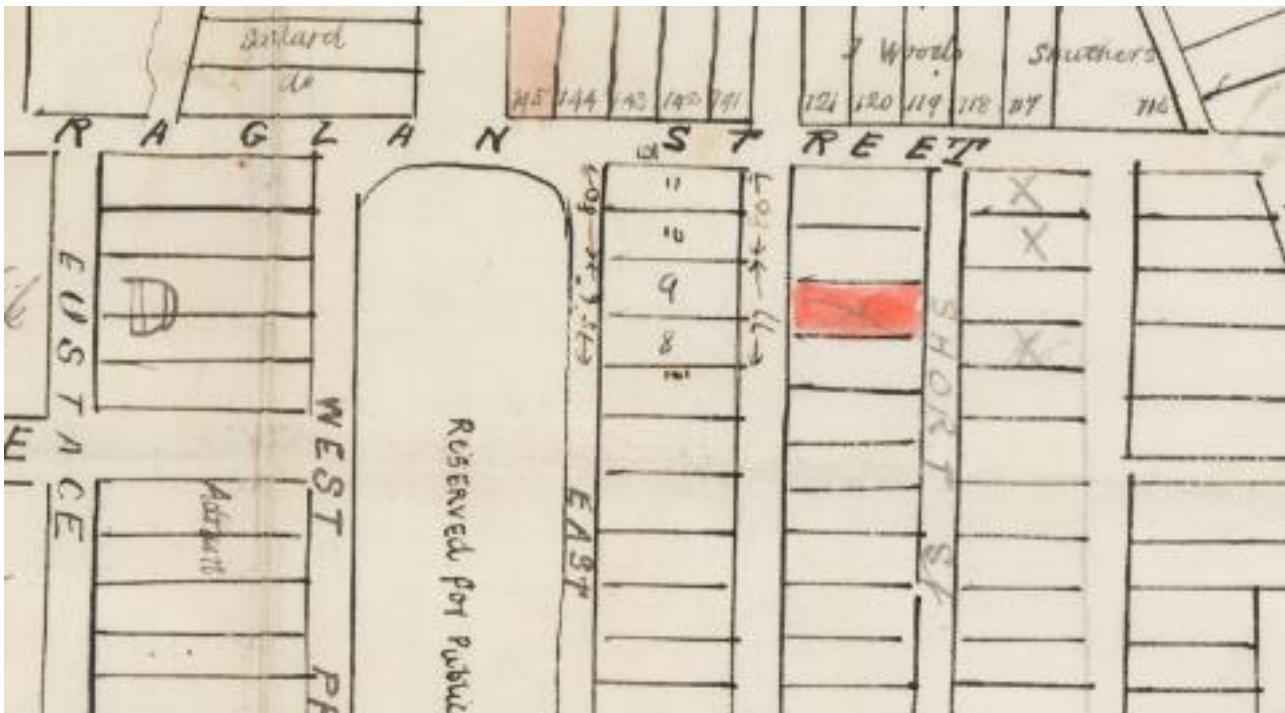


Figure 12 – Extract of Brighton subdivision plan for Manly Beach, undated, but matching the subdivisions of the subject site that traded in 1875

Source: 163 - SP/M5/159 - Brighton, Manly Beach, of Manly Subdivision plans accessed at <https://collection.sl.nsw.gov.au/record/74Vvdye3DM2Z/MNoZybV5mBjvV>

2.2.1. Roseville

Thomas Rowe was the first mayor of Manly, and a premier Sydney architect who made such contributions as The Great Synagogue (Elizabeth Street) and Sydney Arcade (Pitt Street) to the city's landscape. He served as mayor from 1877 to 1879, and his residence on the subject site was known as "Roseville". The cottage was also occupied by the second mayor of Manly, Alfred Hilder, in 1881 when he was out of office. As he left the office two months before the newspaper extract,¹⁶ it is possible he lived there during his mayoral tenure, making "Roseville" the site home of the first two mayors of Manly.

It is not known whether the cottage was designed by Rowe, or its exact date of building, but a layout of the cottage is visible in sale adverts. Contemporary newspaper advertisements described "Roseville" as "An extremely pretty and well-built Villa Residence" and "one of the choicest little properties in Manly, built of brick on stone foundations, and cemented, slated roof, and containing every convenience and comfort". It featured drawing and dining rooms, a Library, Hall, coach house and stable, and more.

¹⁶ New South Wales Government Gazette, No. 57, 11 February 1881, page 887.

WEDNESDAY, MAY 12, at 2.30 p.m.
AT ROSEVILLE, MANLY BEACH,
opposite the Reserve,
THE RESIDENCE OF THOMAS ROWE, Esq.
UNRESERVED AUCTION SALE,
on the Premises, of
SURPLUS FURNITURE AND EFFECTS,
including
DRAWING-ROOM FURNITURE
DINING-ROOM FURNITURE
HALL and BEDROOM FURNITURE
2 PIANOS
ENGRAVINGS
OIL PAINTINGS
CHINA and GLASSWARE
ELECTROPLATED-WARE
PARK PHAETON and PONY
&c., &c., &c.
TERMS, CASH. NO RESERVE.
HARDIE and GORMAN have received instructions
from THOMAS ROWE, Esq., on account of his removal, to
sell by public auction, ON THE PREMISES,
ROSEVILLE, MANLY,
at 2.30 o'clock, on WEDNESDAY, 12th MAY,
FURNITURE and EFFECTS, &c.
Catalogues are now being prepared.

Figure 13 – Newspaper advert for Rowe's surplus furniture auction at his residence in 1880

Source: Sydney Morning Herald, May 8, 1880, page 13

"ROSEVILLE," MANLY.
at present occupied by A. Hilder, Esq., J.P.,
ex-Mayor of Manly.
An extremely pretty and well-built VILLA RESIDENCE, oppo-
site the PARK RESERVE, with streets on 3 sides made,
kerbed and guttered, containing the following accommoda-
tion :-
DRAWING and DINING ROOMS with folding doors and Library,
all well corniced
The HALL is well arranged, arched with spaces for Statuary,
China closet at end with ornamental door
The best Bedroom has triplet window with bathroom off, hand-
somely corniced. There are three other bedrooms, also a
second pantry, detached kitchen with paved covered way,
trellised, &c.
Laundry, Man's Room, Wood and Coal House
Coachhouse and Stable.
Large Water Supply and perfect drainage arrangements.
One of the choicest little properties in Manly, built of brick
on stone foundations, and cemented, slated roof, and containing
every convenience and comfort.
The grounds are very tastefully laid out, and the whole property
is in first-class order.
HARDIE and GORMAN will sell by public auction,
at their Rooms, Pitt-street, at 11.30 o'clock,
THIS DAY, 13th APRIL,
"ROSEVILLE," MANLY BEACH, very convenient to the
steamers' wharf, opposite the PARK RESERVE, and
occupying about the premier position in this
FAVOURITE WATERING PLACE.
ROSEVILLE is beautifully situated in the most sheltered
part of Manly, receiving all the benefits of the sea without the
exposure to the westerly winds. It is surrounded by main roads
kerbed and guttered on three sides, having
160 feet frontage to PITTWATER ROAD
101 feet frontage to RAGLAN-STREET
160 feet frontage to WISTLER-STREET.
PHOTOGRAPH OF ROSEVILLE IS ON VIEW AT THE
ROOMS.

Figure 14 – Advert for sale of Roseville in 1881, describing the cottage and revealing the second Mayor of Manly lived there as well

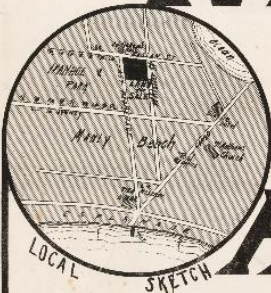
Source: Sydney Morning Herald, April 13, 1881, page 9

COTTAGE, GROUNDS AND 4 VALUABLE BUILDING SITES

MANLY

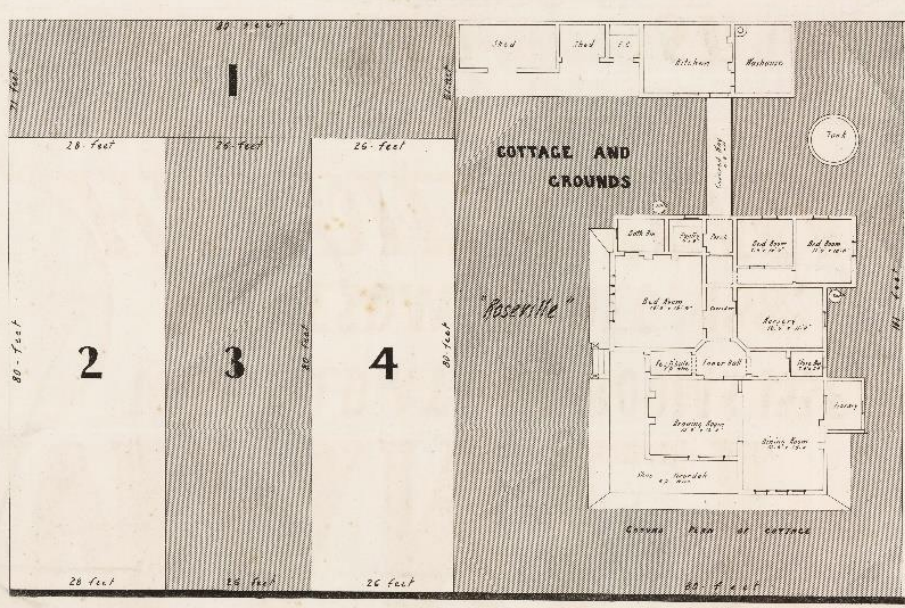
TO BE SOLD AT THE ROOMS 133 Pitt St
WEDNESDAY 5th DEC. 1883

HARDIE AND CORMAN
AUCTIONEERS



WHISTLER ST.

RACLAN ST.



EAST PROMENADE

IVANHOE PARK

GIBBS, SPILLARD & CO. PRINTERS.

17/858

Figure 15 – Auction advert from 1883 for neighbouring, undeveloped Lots, showing the floorplans of Roseville cottage and grounds

Source: 621 - SP/M5/655 - Cottage, Grounds & 4 Building Sites – Manly, of Manly Subdivision plans accessed at <https://collection.sl.nsw.gov.au/record/74Vvdye3DM2Z/0Q6L5zwvgOBAq>

2.2.2. Restormel

In 1885, Samuel B. Bailey became owner,¹⁷ and the property became known as “Restormel.”¹⁸ It was then purchased in 1888 by Alfred Bennett, beginning a long association of the site with the Bennett family, hosting social gatherings and events¹⁹ in the prominent spot across Ivanhoe Park. Based on the subdivision map from 1883, and the Water Board map from 1891, at this time the site consisted of the residence and outbuildings (roughly corresponding to Lots 8 and 9), with a yard extending to Raglan Street. This yard was advertised for sale in 1912, noting it as a suitable site for business or residential purposes.²⁰ In 1914, the site was subdivided again and the Lots 11, 10, and part of 9 being sold off for commercial development, and the Bennett’s holding the subject site (Lots 8 and part of 9) until 1919.²¹ The northern lots would become commercial premises, as the rest of Belgrave Street moved in that direction.



Figure 1617 – 1891 Water Board plan showing Restormel’s plan and presence within Belgrave Street (then East Promenade)

Source: ‘Belgrave Street’ study, Northern Beaches Library Services History Hub

2.2.3. Commercial building and 21 Whistler Street

With the subject site consisting of the former Lot 8 and part of 9 in 1921, the site was separated from those northern Lots that were developing into commercial premises. At some point, Restormel was demolished, and a new residence constructed on the eastern side of the estate, which became 21 Whistler Street. This is likely to have been done by 1923, and potentially in 1920, as the 1920 Sands Directory notes an address at 40/40a Belgrave Street²² and 1923 noting 21 Whistler Street as a separate address.²³ 21 Whistler Street incorporated the extant fabric of the outhouses of Restormel, while most of the previous site was lost.²⁴

¹⁷ NSW Historical Lands Records Viewer, Primary Application Number 18475.

¹⁸ Sands Directory (1887) p283

¹⁹ Evening News, 5 Dec 1893, page 6, “After the match the two teams partook of the hospitality of Mr. and Mrs. Alfred Bennett, at their Manly residence, Restormel, and bettered a pleasant afternoon’s sport with a delightful social evening”; The Daily Telegraph, 21 Dec 1912, page 21, “Mrs. Alfred Bennett was “at home” to a large number of friends at her residence, Restormel, Manly, on Thursday afternoon. The rooms were decorated with Christmas bush, hydrangeas, and bouvardias. A musical programme was rendered...”

²⁰ The Daily Telegraph, 6 November 1912, page 3.

²¹ Vol-Fol 2435-37

²² Sands Directory 1920, page 445.

²³ Sands Directory 1923, page 510.

²⁴ 21 Whistler Street, Manly, Independent Heritage Review, Full Circle Heritage, April 2019.



Figure 18 – Subdivision of the site when it was separated from the northern Lots, and still connected to 21 Whistler Street. Shading indicated that Restormel was on the site and extended into the neighbouring Lot to the north, at the time this was drawn. It would soon be demolished and the only extant fabric being converted into 21 Whistler Street.
Source: Vol-Fol 3189-186

A heritage study of 21 Whistler Street has suggested that the Bennett children used a mortgage taken out in 1919 to fund construction of the subject site.²⁵ No documentary evidence of the building's construction was found, but the writers of the heritage study inferred that an early 1930s design and construction would be consistent with its Inter-War Spanish Mission style (which has also been verified by Urbis following a site inspection – refer to Section 3.2.1). Historical aerial photography shows that the site has not changed its form since the 1940s.

²⁵ Vol-Fol 3189-182; 21 Whistler Street, Manly, Independent Heritage Review, Full Circle Heritage, April 2019.



Figure 19 – Aerial view of the site in 1943
Source: New South Wales Historical Imagery



Figure 20 – Aerial view of the site in 2005
Source: New South Wales Historical Imagery

In 1938, the site was trading as a commercial premises. A Lease was signed to Caldwell's Wines Limited "of the shop and premises known as number 40A Belgrave Street Manly."²⁶ It was sold in 1939 to close the joint ownership of the Bennets, and advertised as a "DOUBLE-FRONTAGE BLOCK In an important business position."

**FOR POSITIVE SALE,
TO CLOSE A JOINT OWNERSHIP.
MANLY. MANLY.
DOUBLE-FRONTAGE BLOCK.
In an important business position.**

KNOWN AS NOS. 40 and 40a BELGRAVE STREET,
between Sydney Road and Raglan Street; and
COTTAGE, No. 21 WHISTLER STREET, at rear.
**AN ACTIVE AND IMPROVING PART OF AN
IMPORTANT THOROUGHFARE.**

Comprising 2 Double-fronted Shops and Dwellings
and Cottage fronting Whistler Street at rear.

THE SITE would be an **EXCELLENT ONE** for
the erection of a Block of **MODERN SHOPS** and
RESIDENTIAL FLATS in combination.

LAND, 56ft 6in frontage to BELGRAVE STREET,
depths 104ft 10in and 104ft 6in respectively, and
58ft 4in to **WHISTLER STREET** at rear. **TORRENS
TITLE.**

RENTALS TOTAL £390 Per Annum.

AUCTION SALE of above at the Rooms, 92 **PITT
STREET, SYDNEY,** on **FRIDAY, 21st APRIL,** at
11 a.m., in conjunction with **ROBEY, HANSON, and
STRONG** (of Manly).

RICHARDSON & WRENCH, LTD.
W. S. Gray and Perkins, of 375 George Street,
Sydney, are Solicitors for Vendors.

(286)

Figure 21 – Sydney Morning Herald advertisement of the subject site in 1939
Source: Sydney Morning Herald Wed 19 Apr 1939, page 24

²⁶ Vol-Fol 5051-103

In 1950, the property was subdivided into its modern form, with Lot A being the subject site and Lot B being 21 Whistler Street. The Title Deed shows ownership and tenancies transferred around between banks, hairdressers, and retailers. In 1970 the site was known as 36 Belgrave Street, Manly, by 1977 it was 38 and 39 Belgrave Street, Manly, and a year later as 35 Belgrave Street, Manly. In 1979, the property began trading as a Strata Plan, SP14133.²⁷

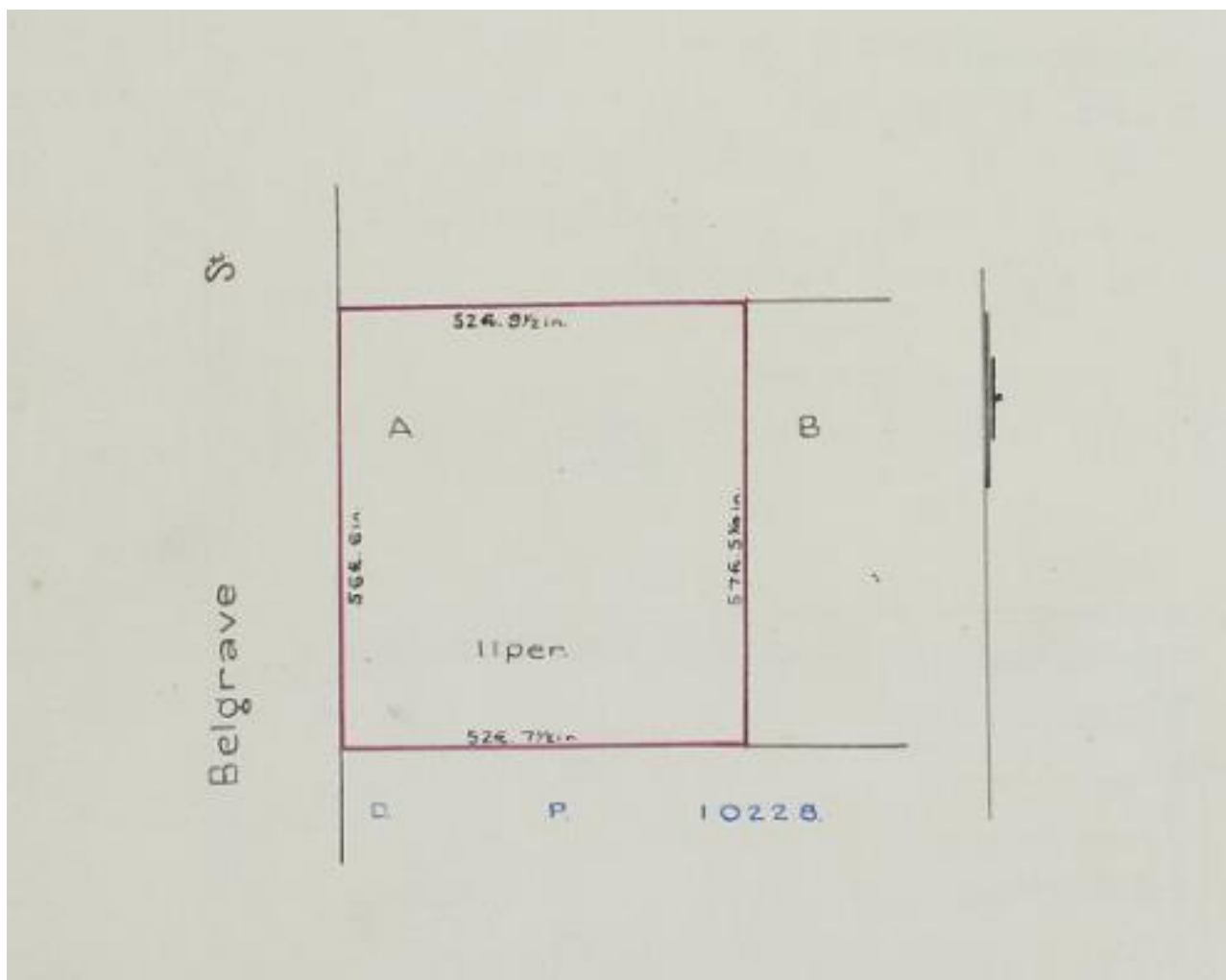


Figure 22 –23 35-39 Belgrave Street, shown as Lot A in its 1950 subdivision site boundary, which separated it from Lot B. This curtilage has remained since.
Source: Vol-Fol 6176-202

²⁷ Vol-Fol 6176-202



Figure 24 – The subject site in Belgrave Street in the 1960s or 1970s, at which point it was commercial premises
 Source: Northern Beaches Council Library, Local Services, History Hub

Historical records show that very minor works have been undertaken on the site between 1994 and 2017, all at or below \$20,000, for refitting purposes for different commercial needs such as massage parlour and food and drink premises.²⁸ The history of this site follows its early years as a commercial premises that took advantage of its central position in town. The building, like the surrounding locality, was a spot that was destined for and developed by commercial interests, following the early-20th century demolition of the former residence and the development of Belgrave Street as an important commercial strip.

²⁸ 35-39 Belgrave Street, Northern Beaches Council DA Tracker, accessed at <https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Public/XC.Track/SearchProperty.aspx?id=455134>

3. PHYSICAL DESCRIPTION

3.1. SETTING & STREETScape

3.1.1. Belgrave Street

Belgrave Street is a 4-lane, main suburban road which runs north-south from Manly Wharf and continues to become Pittwater Road north of the intersection with Raglan Street. The block of Belgrave Street on which the site is located is mixed in urban character and use, including buildings between two to five stories in height on the east side, and the public open space of Ivanhoe Park on the west side.

The buildings on the east side range in scale, age, and style, and include some Inter-War developments, mid- to late-twentieth century buildings, and a contemporary, mixed-use building at the southern end (at the intersection with Sydney Road). In general, the buildings maintain a consistent zero setback from the footpath, opening to the public domain at ground-level with retail tenancies. The upper levels of these building appear to contain a mix of residential and commercial uses.

At the west side of Belgrave Street, which contains Ivanhoe Park, the footpath is defined by a row of mature trees.



Figure 25 – Belgrave Street, viewed facing south from the intersection with Raglan Street
Source: Urbis, March 2023



Figure 26 – Belgrave Street, viewed facing north from the intersection with Sydney Road
Source: Google Maps, 2022

3.1.2. Raglan Street

Raglan Street, at the north side of the site, is similarly mixed in built character. The block between Belgrave Street and Whistler Street, on which the subject site is located, contains the north façade of the existing building at 43 Belgrave Street on the south side, and a mix of older and contemporary buildings on the north side. This includes a 3-storey, late-twentieth century commercial building on the corner of Belgrave Street, a 2-storey Inter-War building (used as a hotel), and a 3-storey contemporary mixed-use development at the intersection with Whistler Street. Aside from the consistent 2- to 3-storey street wall created by these buildings, there are no consistent features among them (by way of use, design, or external finishes).



Figure 27 – Raglan Street, viewed facing east from the intersection with Belgrave Street
Source: Google Maps, 2021



Figure 28 – Raglan Street, viewed facing west from the intersection with Whistler Street
Source: Google Maps, 2021

3.1.3. Whistler Street

Whistler Street is a narrow, single-lane street with a mixed built character, including buildings dating to Manly's early development (such as the single-storey sandstone church at the intersection with Sydney Road), Inter-War development (including the 2-storey, heritage-listed substation building at 34A-36 Whistler Street, and the 4-storey mixed use building at no.17), post-War buildings (such as the 6-storey mixed-use building at 48-52 Sydney Road which backs onto Whistler Street, and the 2-storey shop-top at no. 23), and

contemporary development (including the 5-storey mixed-use development at the intersection with Sydney Road, and the 9-storey building currently under construction at no. 26, adjoining the listed substation).



Figure 29 – Whistler Street, viewed facing north from the intersection with Sydney Road
Source: Google Maps, 2021

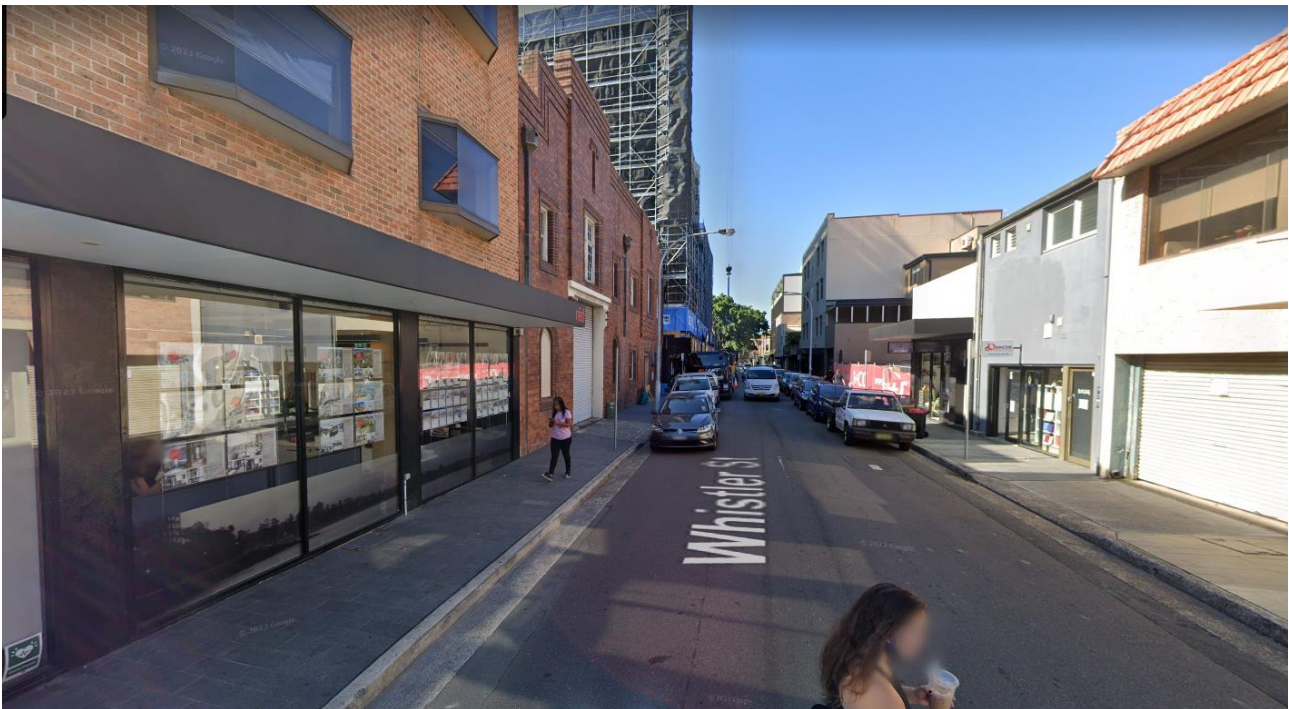


Figure 30 – Whistler Street, viewed facing south from the intersection with Raglan Street
Source: Google Maps, 2021

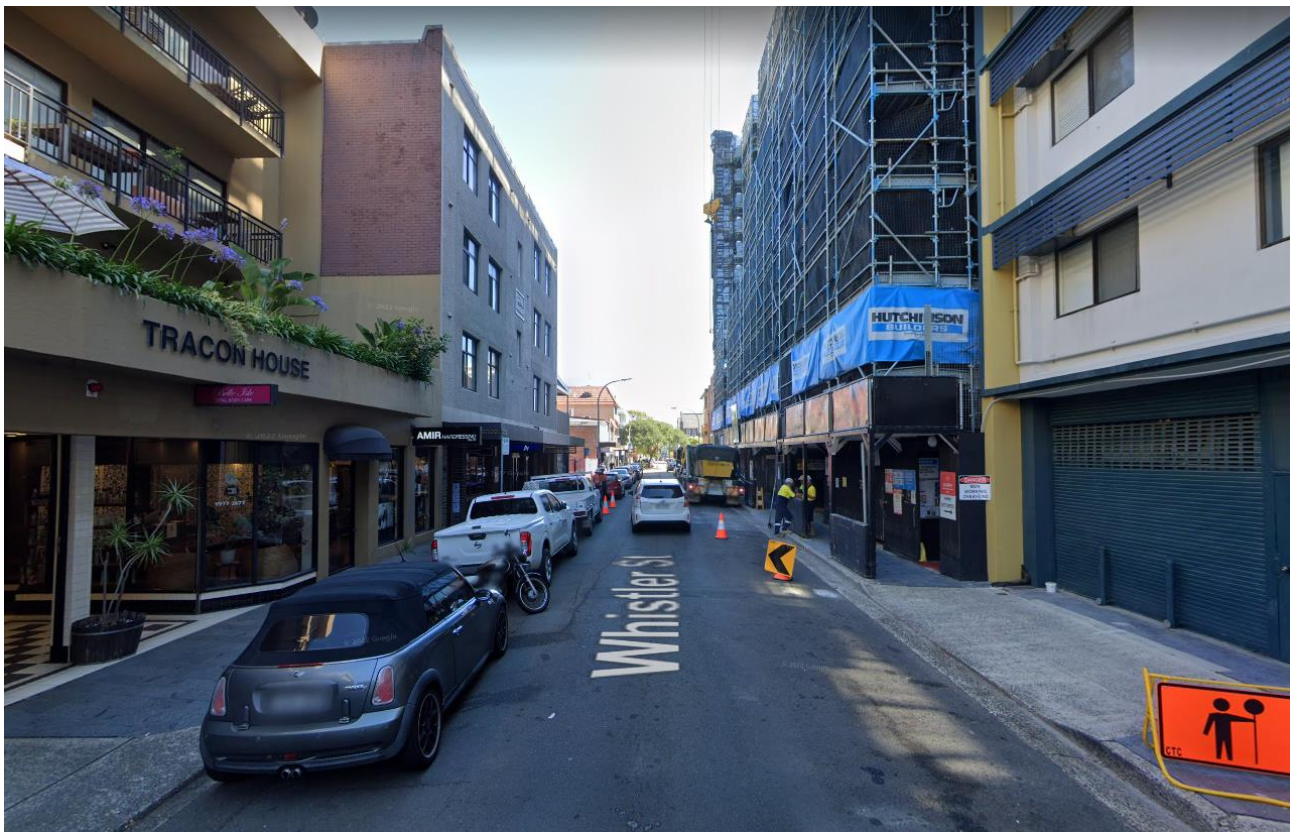


Figure 31 – Whistler Street, viewed facing north from the rear of 'Tracon House' at no. 27 Belgrave Street)
Source: Google Maps, 2021

3.2. SUBJECT SITE

3.2.1. 35-39 Belgrave Street

35-39 Belgrave Street comprises a 2-storey Inter-War building, with a frontage only to Belgrave Street (its rear frontage backs onto the property at 21 Whistler Street). It contains 4 commercial shopfronts at Belgrave Street, a central entry to the upper levels from Belgrave Street (between the 4 shopfronts), and 3 commercial office tenancies at the upper level.

The building is influenced by the Inter-War Mediterranean style, with a stepped central parapet and visible tiled gable roof. The upper-level façade is punctured with a series of rectilinear and bracketed window openings, as well as a central vertical arched opening at the central stairwell. The shopfronts retain no original fabric, with the exception of brick structural elements.

Internally, the ground-floor tenancies appear to have retained no original fabric (although not all tenancies were accessed at the time of inspection) and seem to all have contemporary fitouts (including a commercial kitchen at the amalgamated southern tenancies). The central stair leading to the upper levels is original, and has an original metal balustrade, however has been clad over with tiles. Similarly, the dado line of the stairwell wall has been clad with non-original tiles. Of the upper-level tenancies, only 1 was briefly inspected. While this appears to have retained some original fabric (timber flooring, sections of timber skirting, timber architraves), this fabric is relatively pedestrian and typical of buildings of the period.



Figure 32 – 35-39 Belgrave Street, principal elevation at Belgrave Street
Source: Urbis, March 2023



Figure 33 – 35-39 Belgrave Street, rear frontage viewed from Whistler Street
Source: Urbis, March 2023



Figure 34 – Detail of rear elevation of 35-39 Belgrave Street
Source: Urbis, March 2023



Figure 35 – Ground-floor commercial tenancies, typical layout & fabric
Source: Urbis, March 2023

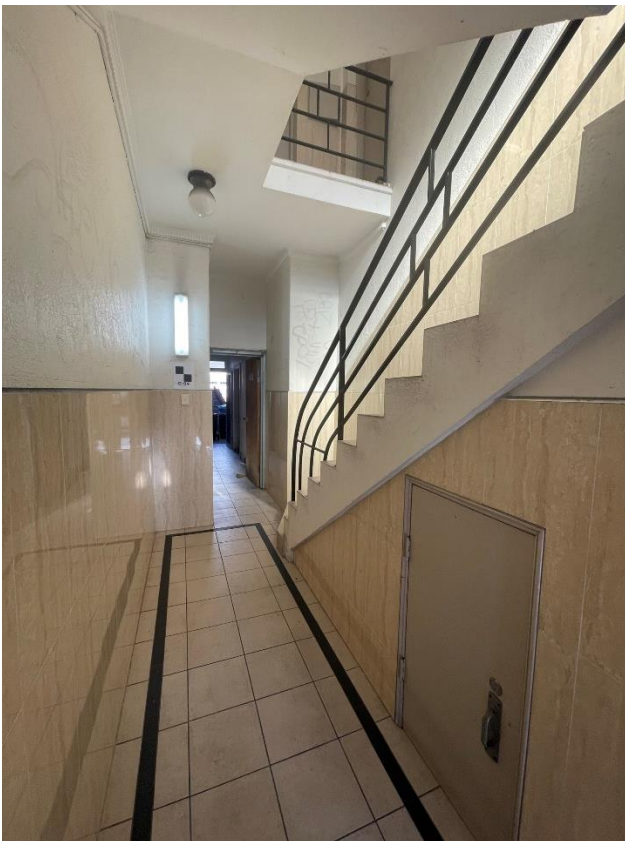


Figure 36 – Central stair at ground-floor level
Source: Urbis, March 2023

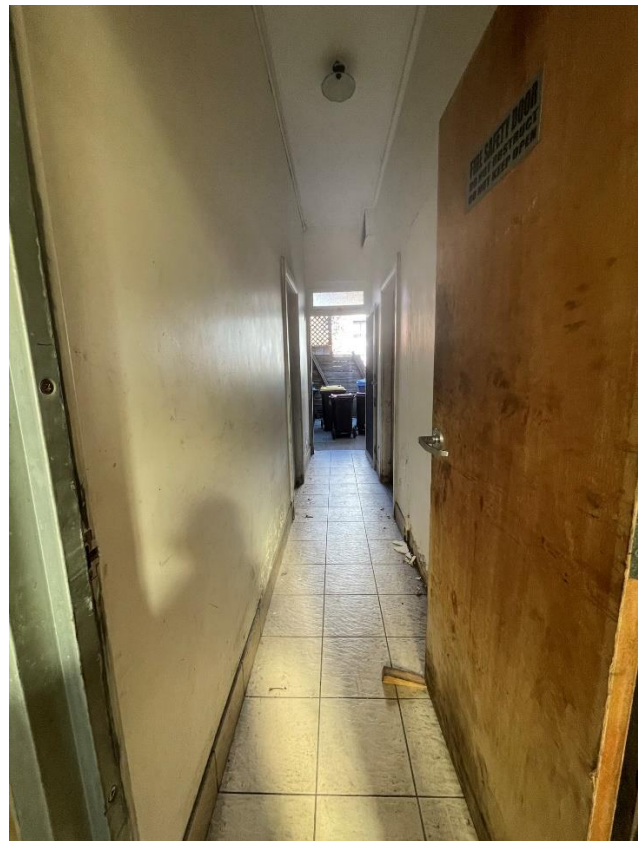


Figure 37 – Corridor at rear of ground-floor level
Source: Urbis, March 2023



Figure 38 – Upper landing of central stair
Source: Urbis, March 2023

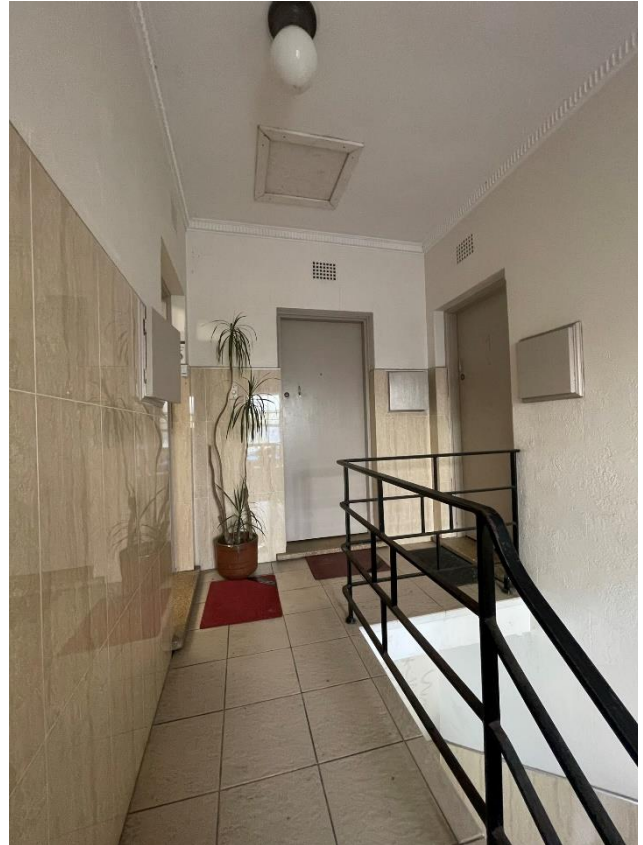


Figure 39 – Upper landing, providing access to commercial tenancies at level 1 of the building
Source: Urbis, March 2023



Figure 40 – General view into northern tenancy
Source: Urbis, March 2023

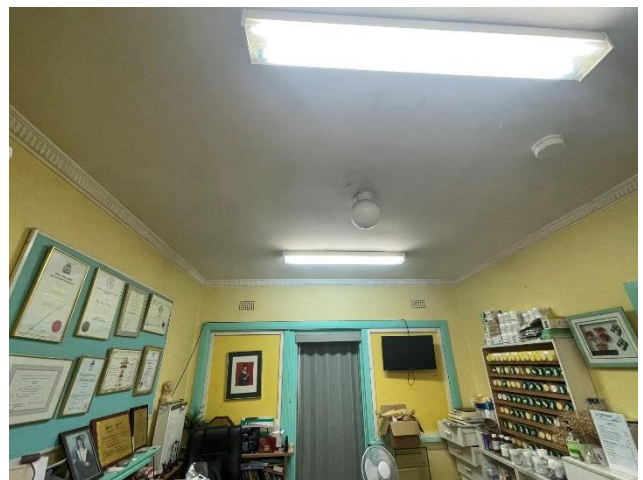


Figure 41 – General view into front room of northern tenancy
Source: Urbis, March 2023

3.2.2. 40 Belgrave Street

40 Belgrave Street comprises a part-3 (at Belgrave Street), part-1 (at Whistler Street) building with commercial premises at both ground-floor frontages. It appears to date to the post-War period and possesses no distinct architectural features.



Figure 42 – 40 Belgrave Street, west elevation at Belgrave Street

Source: Urbis, March 2023

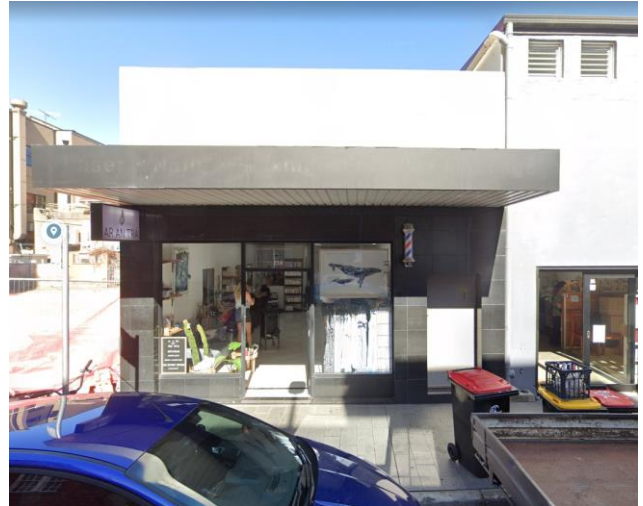


Figure 43 – 40 Belgrave Street, east elevation at Whistler Street

Source: Google Maps, 2021

3.2.3. 41 Belgrave Street

41 Belgrave Street comprises a 2-storey shop-top-style building which houses commercial premises at the ground-floor level (one accessed from Belgrave Street, one accessed from Whistler Street) and a commercial office space at level 1. It appears to date to the post-War period and possesses no distinct architectural features.



Figure 44 – 41 Belgrave Street, west elevation at Belgrave Street

Source: Urbis, March 2023



Figure 45 – 41 Belgrave Street, east elevation at Whistler Street

Source: Google Maps, 2021

3.2.4. 42-43 Belgrave Street

42-43 Belgrave Street comprises a part-2, part-3-storey, late-twentieth century commercial building which mimics traditional detailing through its faceted window bays, face brick façade, and tiled hipped roof. It has frontages to Belgrave, Raglan, and Whistler Streets.



Figure 46 – 42-43 Belgrave Street, west façade as viewed from Belgrave Street
Source: Urbis, March 2023



Figure 47 – 42-43 Belgrave Street, north façade as viewed from intersection of Belgrave & Raglan Streets
Source: Urbis, March 2023



Figure 48 – 42-43 Belgrave Street, east façade as viewed from intersection of Raglan & Whistler Streets
Source: Google Maps, 2020

4. HERITAGE SIGNIFICANCE

4.1. WHAT IS HERITAGE SIGNIFICANCE?

Before undertaking change a listed heritage item, a property within a heritage conservation area, or a property located in proximity to a listed heritage item, it is important to understand the heritage values of the place and its broader heritage context. This understanding will underpin the approach to any proposed changes and identify what is important and why, and how these values can be protected. Statements of heritage significance summarise the heritage values of a listed heritage item – why it is important and why a statutory listing was made to protect these values.

In the context of the current application, it is necessary to ascertain the heritage significance of the heritage items and HCAs in the vicinity of the site which will have a visual relationship with the new development (as listed in Section 1.3.3, above). Council has also requested that the potential significance of the existing building at 35-39 Belgrave Street be examined. An assessment of this building against the listing criteria provided by the Heritage Council of NSW is undertaken below.

4.2. HERITAGE ITEMS & HCAS IN THE VICINITY OF THE SITE

The table below provides statements of significance for the heritage items and HCAs in the vicinity of the site. These statements have been reproduced, in full, from the NSW State Heritage Inventory.

Table 2 – Statements of significance – Heritage items & HCAs in the vicinity of the site

Heritage item / HCA	Statement of significance	Reference image
Ivanhoe Park I162	<i>Ivanhoe Park has historical significance at a Local level because it is a physical remnant of a nineteenth century pleasure garden from the period when the Manly village area was a seaside resort and an embodiment of local entrepreneurs who provided recreation (both leisure and sporting) facilities for prospective residents as well as for day-trippers from Sydney. It is also significant at a Local level as the site of the first Manly Council chambers building and the site of part of the Spit to Manly tram line. It is of historical significance at a Local level, and possibly at a State level, as one of the oldest cricket grounds still in use within the Sydney area, second only to the Garrison Cricket Oval, the Domain and the University Oval and one of the first to be formalised within in a suburban park. As the site of the renowned Manly Wildflower show held from 1881 onwards until 1893, the park still retains some of the ferns for which the park (and the area) was once known.</i> <i>Ivanhoe Park has associative historical significance at a Local level because of the site's ownership by significant local entrepreneurs including T. Adrain, the Mayor C. H. Hayes. Mr and Mrs Townsend Robey were influential in the success of the wildflower show and the formation of the sports clubs.</i> <i>Ivanhoe Park has aesthetic significance at a Local level because of the provision of open space at the entrance to the Manly village and the extensive and picturesque landscaping of the steep portion of the site, as well as including 1960s buildings of architectural merit and interest (such as the day-care centre and the former Boy Scouts Hall) and the Interwar Caretaker's Cottage. The changing layout and use of the pavilions within the park reflects the change in use from a promenade, picnic and exhibition grounds to sporting grounds and facilities for girl guides and scouts. The now demolished pavilions were highly regarded when completed.</i> <i>Ivanhoe Park has social significance at a local level because of the strong connection between the residents of Manly and the facilities within the park.</i>	 Source: Heritage NSW, 2023

Heritage item / HCA	Statement of significance	Reference image
	<i>Popular on Public Holidays, the park and pavilion were the venue for events such as the Eight Hour Day demonstration during the 1870s. Associated with local sporting teams who have utilised the oval since its inception.</i> <i>Unlike most suburban parks, Ivanhoe Park was created by quarrying and levelling, and retains two distinct sections, the sports grounds on the flat and the remnant bush to the west. Other quarried example being Trumper Park.</i> <i>The pattern of uses for this park is broader than most parks, however other Sydney parks including the Domain and Prince Alfred Park were the site of exhibitions. The kindergarten and Girl Guides Hall designed by the award-winning architectural firm of Edwards Madigan and Torzillo is one of a series of buildings designed by this firm on the Northern Beaches during the 1960s.</i> <i>Intrusion of and alienation of parts of the park by some facilities but the upper section of the park retains an appearance of a park for public leisure and recreation with its extensive plantings and mature trees.</i>	
Electricity substation No 15009 34A–36 Whistler Street I255	<i>The Manly Zone Substation is a well detailed electricity substation building still in service for its original purpose. It is an excellent and externally intact representative example of the Interwar Art Deco style and is the last remaining known asset constructed by the Manly Electric Supply Company. It was subsequently acquired and extended by the Municipal Council of Manly. It is representative of the transition period from private to public electricity in the early 20th century in Sydney's Northern Beaches area.</i>	 Source: Google Maps, 2021

Heritage item / HCA	Statement of significance	Reference image
St Mary's Church, presbytery and school Whistler Street (corner Raglan Street) I254	<i>The listing covers a significant group of five religious and school buildings dating from circa 1890 to the 1950s, complementary in style. The group is of significance for Manly area for its historical, aesthetic and social reasons, and for the rarity and representativeness. The site has a long and ongoing spiritual association with the local Roman Catholic community since c.1890 when the church building was created. The site is a major landmark visible from a distance from both Raglan Street and Whistler Street. The complex makes a major contribution to the streetscape and to the townscape character, augmented as the group of buildings are adjoining each other at the site. The Church building, the Presbytery and School are each representative of their respective type of building around the date of creation, and the complex as a whole is a rare collection of five fine buildings with spiritual associations in the local area.</i> <i>St Mary's Catholic Church, school and presbytery have historical significance at a Local level as a physical embodiment of the development of Manly as a settlement and the establishment of places of worship for different denominations funded by the parishioners.</i> <i>St Mary's Catholic Church, school and presbytery have aesthetic significance at a Local level as well-designed places of worship and education. The complex contains a series of buildings designed by Sydney-based architects who undertook numerous commissions for the Roman Catholic Church in NSW, namely Tappin, Dennehy and Smart, Nangle and Nurzey, Austin McKay and Scott Green & Scott.</i> <i>The 1927-28 school building by Scott, Green & Scott, architects is significant as a well-designed architectural composition by a well-known firm from the first half of the twentieth century. In addition, the carefully executed designs by McKay foreshadow his later modern church designs. Similar details can be found in the more substantial ecclesiastical designs of Tappin, Dennehy and Smart. The scale of the buildings within the complex, and the combination of functions into single</i>	 Source: Google Maps, 2021

Heritage item / HCA	Statement of significance	Reference image
	<i>buildings is unusual in Australia, particularly the location of the monastery and chapel above the school.</i> <i>St Mary's Catholic Church, school and presbytery have social significance at a Local level because they are cherished by past and present members of the church community. St Mary's Catholic Church, school and presbytery have maintained their original purpose. The church and school have undergone a number of changes reflecting the growth of the congregation and increases in pupil numbers.</i>	
Baby health care centre building 1 Pittwater Road I196	<i>This item is of local cultural heritage significance [sic] for its ability to demonstrate the pattern of Manly's development and that of Government utilities. The building is an example of a Baby Health Clinic constructed in the mid Twentieth Century in response to the development of the care for children's health. It is a fine and intact example of Post War International style of architecture.</i>	 Source: Google Maps, 2021
Pittwater Road Conservation Area C1	<i>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.</i>	 General view into the Pittwater Road HCA from the intersection of Belgrave and Raglan Streets Source: Google Maps, 2022

Heritage item / HCA	Statement of significance	Reference image
Town Centre Conservation Area C2	<i>The Manly Town Centre Conservation Area (TCCA) is of local heritage significance as a reflection of the early development of Manly as a peripheral harbor and beachside village in the fledgling colony of New South Wales. This significance is enhanced by its role as a day-trip and holiday destination during those early years, continuing up to the present time, and its association with H G Smith, the original designer and developer of the TCCA as it is today. The physical elements of the TCCA reflect this early development and its continued use for recreational purposes, most notably the intact promenade quality of The Corso and its turn of the century streetscape, as well as key built elements such as hotels, and remaining original commercial and small scale residential buildings.</i> <i>The beautiful natural setting of the TCCA has provided a solid foundation for its picturesque qualities. The cultural landscape, including plantings, monuments and open spaces, reflects the continued enhancement of the TCCA over time, in order to attract and sustain visitors to the area, which in turn has provided great support to the local economy. The many historic vistas which remain to this day enhance the visitor experience of the TCCA and assist with providing an interpretation of the TCCA as it has changed over time.</i> <i>The TCCA maintains a high level of social significance, as a popular destination for local, national and international tourists, as well as through its encapsulation of the Australian beach culture.</i>	 General view into the Town Centre HCA from the intersection of Belgrave Street and Sydney Road Source: Google Maps, 2022

4.3. 35-39 BELGRAVE STREET – SIGNIFICANCE ASSESSMENT

The Heritage Council of NSW has developed a set of seven criteria for assessing heritage significance, which can be used to make decisions about the heritage value of a place or item. There are generally four levels of heritage significance used in Australia: local significance, state significance, national significance and world significance. The following assessment of heritage significance has been prepared in accordance with the Heritage NSW 'Assessing Heritage Significance' guidelines (2023) to determine whether the subject site meets the requisite threshold for heritage listing and at what significance level.

4.3.1. Criterion A – Historic significance

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

Table 3 – Assessment of Heritage Significance Criterion A – Historic Significance

Criterion A – Historic Significance	
Significance Indicators	Significance Assessment
☐ Association with an event, or series of events, of historical, cultural or natural significance.	The commercial building at 35-39 Belgrave Street likely dates to the late Inter-War period, toward the end of a key period of historical development within the local area. As one of many Inter-War commercial buildings within Manly – and as a probable later example of the type – the building itself is not considered influential in demonstrating the influence of this key period within the local area. Similarly, the building is not known to have any notable association with changing demographic factors nor with an important phase of social or economic development within the local area, having regard for its likely late construction within the period. As one of many Inter-War commercial buildings within Manly, the building itself is not considered important in illustrating the local area's ongoing commercial development, nor is it an important surviving example of an Inter-War commercial building. The building is not known to possess any symbolic meaning to the community, nor is it identified as having a notable influence – in and of itself – on physical or social outcomes in the local area. As such, the threshold for historic significance is not met, and the subject building does not fulfil this criterion.
☐ Demonstration of important periods or phases in history.	
☐ Association with important cultural phases or movements.	
☐ Demonstration of important historical, natural or cultural processes or activities.	
☐ Symbolism and influence of place for its association with an important historical, natural or cultural event, period, phase or movement.	

4.3.2. Criterion B – Historical association

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 the cultural or natural history of the local area).

Table 4 – Assessment of Heritage Significance Criterion B – Historical Association

Criterion B – Historical Association	
Significance Indicators	Significance Assessment
☐ A key phase(s) in the establishment or subsequent development at the place or object was undertaken by, or directly influenced by, the important person(s) or organisation.	The former residence at the site, Roseville (later, Restormel) was associated with the first mayor of Manly, Thomas Rowe, and his successor, Alfred Hilder. However, this association has been extinguished as a result of the demolition of the building in the early-20th century. The current building which occupies the site is not known to have any association or relationship with any persons of historical interest within the local area, including any notable owners, occupants, or architects. As such, the threshold for historical association is not met, and the subject building does not fulfil this criterion.
☐ An event or series of events of place over an extended period historical importance occurring at the place or object were undertaken by, or directly influenced by, the important person(s) or organisation.	
☐ One or more achievements for which the person(s) or organisation are considered important are directly linked to the place or object.	

4.3.3. Criterion C – Aesthetic / Creative / Technical

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

Table 5 – Assessment of Heritage Significance Criterion C – Aesthetic/Creative/Technical

Criterion C – Aesthetic/Creative/Technical	
Significance Indicators	Significance Assessment
☐ Recognition as a landmark or distinctive aesthetic natural environment.	The exterior of the existing building at 35-39 Belgrave Street exhibits influences from the Inter-War Mediterranean aesthetic. The style is commonly found in Sydney's coastal suburbs, having been brought to Australia by local architects who had travelled through southern Europe and were inspired by the ways in which architecture responded to the climate. On the building at 35-39 Belgrave Street, the style is most evident in the central stepped parapet form, bracketed and arched windows, and the tiled gabled roof form – all of which are nonetheless relatively pedestrian and architecturally unremarkable, especially when compared to other, more prominent buildings of the style within Manly and throughout Sydney's inner-coastal suburbs
☐ Recognition of artistic or design excellence.	
☐ Represents a breakthrough or innovation in design, fabrication or construction technique, including design/technological responses to changing social conditions.	
☐ Distinctiveness as a design solution, treatment or use of technology.	
☐ Adapts technology in a creative manner or extends the limits of available technology.	

Criterion C – Aesthetic/Creative/Technical	
Significance Indicators	Significance Assessment
	(many of which are listed as heritage items for their architectural and creative significance). Importantly, the building does not exhibit many of the key characteristics of the style – such as a textured finish to the brickwork, an informal, asymmetrical massing, or any meaningful exploitation of sunlight and shadow – which would result in it being considered a building of any artistic or design excellence. Similarly, it demonstrates materials and construction techniques that were in common use at the time, including simply detailed timberwork, an unadorned stair, a simple timber and brick load-bearing construction, and non-decorative ceilings. To this end, the building was clearly built as a modest and functional commercial development within the broader context of a rapidly growing Manly, rather than as any sort of landmark building for the area. Research has not been able to identify an architect for the building, which further crystalises this conclusion. As such, the threshold for aesthetic / creative / technical significance is not met, and the subject building does not fulfil this criterion.

4.3.4. Criterion D – Social, cultural and spiritual

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

Table 6 – Assessment of Heritage Significance Criterion D – Social, Cultural and Spiritual

Criterion D – Social, Cultural and Spiritual	
Significance Indicators	Significance Assessment
☐ <i>Highly regarded by a community as a key landmark (built feature, landscape or streetscape) within the physical environment.</i> ☐ <i>Important to the community as a landmark within social and political history.</i> ☐ <i>Important as a place of symbolic meaning and community identity.</i> ☐ <i>Important as a place of public socialisation.</i>	Research has not uncovered any particular social or cultural associations with the building, which was constructed in the later years of the Inter-War period as a functional commercial development. It is not known to be a place of any particular symbolic meaning which links the past and present by the local community, nor is it a place of any identified importance with regard to public socialisation. As such, the threshold for social, cultural, and spiritual significance is not met, and the subject building does not fulfil this criterion.

Criterion D – Social, Cultural and Spiritual	
Significance Indicators	Significance Assessment
☐ <i>Important as a place of community service (including health, education, worship, pastoral care, communications, emergency services, museums).</i> ☐ <i>Important in linking the past affectionately to the present.</i>	

4.3.5. 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 the cultural or natural history of the local area).

Table 7 – Assessment of Heritage Significance Criterion E – Research Potential

Criterion E – Research Potential	
Significance Indicators	Significance Assessment
☐ <i>Comparative analysis.</i> ☐ <i>Potential to improve knowledge of a little-recorded aspect of an area's past or to fill gaps in our existing knowledge of the past.</i> ☐ <i>Potential to inform/confirm unproven historical concepts or research questions relevant to our past.</i> ☐ <i>Potential to provide information about single or multiple periods of occupation or use.</i> ☐ <i>Potential to yield site-specific information that would contribute to an understanding of significance against other criteria.</i>	The building's exterior demonstrates some tangential influences from the Inter-War Mediterranean style, however these references are modest, pedestrian, and not fully expressive of the style. The structure demonstrates construction materials and techniques that were common at the time, including load-bearing brickwork and a timber floor and roof structure, none of which have potential to improve or add to knowledge of the past. As such, the threshold for research potential is not met, and the subject building does not fulfil this criterion.

4.3.6. Criterion F – Rare

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

Table 8 – Assessment of Heritage Significance Criterion F – Rare

Criterion F – Rare	
Significance Indicators	Significance Assessment
☐ <i>Rare surviving evidence of an event, phase, period, process, function, movement, custom or</i>	Inter-War commercial buildings are commonly found within the Manly town centre (and surrounding suburbs), reflecting the rapid development of the area in this period. Many of

Criterion F – Rare	
Significance Indicators	Significance Assessment
<i>way of life in an area's history that continues to be practised or is no longer practised.</i> ☐ <i>Evidence of a rare historical activity that was considered distinctive, uncommon or unusual at the time it occurred.</i> ☐ <i>Distinctiveness in demonstrating an unusual historical, natural, architectural, archaeological, scientific, social or technical attribute(s) that is of special interest.</i> ☐ <i>Demonstrates an unusual composition of historical, natural, architectural, archaeological, scientific, social or technical attributes that are of greater importance or interest as a composition/collection.</i>	these buildings are either listed heritage items, located within HCAs, or both. As such, the threshold for rarity is not met, and the subject building does not fulfil this criterion.

4.3.7. Criterion G – Representative

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

Table 9 – Assessment of Heritage Significance Criterion G – Representative

Criterion G – Representative	
Significance Indicators	Significance Assessment
☐ <i>A class of places or objects that demonstrate an aesthetic composition, design, architectural style, applied finish or decoration of historical importance.</i> ☐ <i>Representative of a class of places that demonstrate a construction method, engineering design, technology, or use of materials, of historical importance.</i> ☐ <i>Representative of a class of places that demonstrate an historical land use, environment, function, or process, of historical importance.</i> ☐ <i>Representative of a class of places that demonstrates an ideology, custom or way of life of historical importance.</i>	The subject building is a pedestrian example of a late Inter-War commercial building, much of which appears to have been modified over time to suit the changing needs of its occupants. It is not, in itself, able to meaningfully contribute to the stock of other intact and significant buildings of the period which exhibit much higher degrees of integrity and architectural quality. As such, the threshold for representative significance is not met, and the subject building does not fulfil this criterion.

4.4. 35-39 BELGRAVE STREET – STATEMENT OF SIGNIFICANCE

The commercial building at 35-39 Belgrave Street likely dates to the late Inter-War period, toward the end of a key period of historical development within the local area. It exhibits some influence from the Inter-War Mediterranean style (in particular, its stepped parapet, tiled gabled roof, and window proportions), however it is not a refined or important example of its type. It demonstrates materials and construction techniques that were in common use at the time. It therefore does not meaningfully contribute to the stock of Inter-War buildings within the local area (many of which are listed heritage items owing to their historical or architectural importance), and is not a rare or good representative example of its type. The building is not known to have any associations with an identifiable social, cultural, or spiritual group, and its designer / architect remains unknown.

The building at 35-39 Belgrave Street, therefore, does not meet any threshold which would warrant its listing as a heritage item.

5. IMPACT ASSESSMENT

Below, the potential impact of the proposal is assessed against the applicable heritage-related statutory and non-statutory planning controls which relate to the site and the proposed development.

5.1. MANLY LOCAL ENVIRONMENTAL PLAN 2013

The table below provides an assessment of the proposal against the relevant provisions for heritage conservation as found in part 5.10 of the Manly LEP 2013.

Table 10 – Assessment against Manly LEP 2013, part 5.10

Clause	Response
(1) Objectives	<u>Demolition of the existing buildings</u> The proposed demolition of the existing buildings on the site – which do not contribute to the overall character or significance of the locality – will result in a positive heritage outcome as it will enable an architecturally-designed new development which will provide a vastly improved interface to nearby heritage items, HCAs, and to the public domain more broadly. The setting of these listed items and HCAs will, therefore, be enhanced. An assessment of the potential heritage significance of the existing building at 35-39 Belgrave Street has been carried out in the above section of this HIS. The assessment has found that the building does not meet the threshold for listing as a heritage item, owing to its absence of historical, aesthetic, and socio-cultural importance. Its demolition will therefore not generate any adverse heritage impacts. <u>Impacts of the new development</u> The proposed development will not materially impact any listed heritage items or buildings which contribute to the historical or architectural significance of the Manly town centre. The site is not located within a Heritage Conservation Area, nor does it directly adjoin any listed heritage items. The new development will not generate shadow impacts on the listed Ivanhoe Park opposite, nor will it result in adverse shadow impacts on the listed substation building on Whistler Street (noting that this streetscape is already subject to shadow impacts owing to its narrow width and the presence of other tall-scale buildings along it). The new building, itself, is highly respectful of its surrounding heritage context. This is demonstrated through the sympathetic use of brickwork and rendered finishes to the exterior, the appropriate solid-to-void ratios, and the emphasis on verticality which is interpretive of the earlier fine-grain subdivision pattern along Belgrave Street.
(4) Effect of proposed development on heritage significance	This HIS has been prepared to provide an assessment of the potential impacts of the proposed development on the established heritage significance of the heritage items and HCAs located in the vicinity of the site.
(5) Heritage assessment	As above.

5.2. MANLY DEVELOPMENT CONTROL PLAN 2013

An assessment is carried out below against the applicable, heritage-related provisions contained in the Manly DCP 2013.

Table 11 – Assessment against Manly DCP 2013

Provision	Discussion
3.1.3 Townscape (Local and Neighbourhood Centres)	
Local role of the site	
<i>a) The local role of the site and existing buildings should be determined, viewed from the following perspectives:</i> <i>(i) from a distance and along routes and from viewpoints leading towards the locality;</i> <i>(ii) in relation to the adjacent spaces it borders and the need to define those spaces;</i> <i>(iii) in relation to the adjacent buildings and the need to be complementary to those buildings in terms of height, scale and design detailing.</i>	(i) The new development is highly complementary and responsive to its surrounding context. Manly town centre (including those areas identified as HCAs) is characterised by built forms of a range of ages, forms, scales, and typologies. To this end, the 5-storey height of the new building is appropriate and not out-of-place, noting in particular the presence of a 5-storey building on the southern corner of this block of Belgrave Street (at the intersection with Sydney Road). This section of Belgrave Street is, from an urban design perspective, wide enough to carry buildings of this scale without overwhelming the surrounds, including most importantly the listed item Ivanhoe Park opposite. The playful, vaulted roofline of the new development is considered a positive architectural response to the seaside nature of this locality, as well as to detailing found on a number of prominent Inter-War buildings located within it (namely, arched openings). The new building, viewed from a distance, will present as well-resolved new infill that will enhance the architectural quality of the local area. (ii) At the north, the site interfaces with the Pittwater Road Conservation Area, which derives its character from its intact street layout and from the collection of Federation and Inter-War buildings within it. The section of Belgrave Street on which the site is located, however, does not form part of a conservation area, and rather is characterised by a mixture of building forms, types, ages, and scales. This includes built forms, at the interface with the Pittwater Road HCA, which are not of any particular architectural or historical merit. The new development which is proposed on the site will vastly improve the interface between this section of Belgrave Street and the Pittwater Road HCA as a well-resolved example of architectural infill which will add a high-quality contemporary layer to this part of Manly. At the west, the site interfaces with Ivanhoe Park, which is listed under both local and State legislation. The new development will not generate shadow impacts on this highly significant public open space, resulting in no adverse effects. The high-quality architecture of the new building, including the

Provision	Discussion
	sympathetic colour & materials palette and vaulted roofline, will provide a soft and recessive built form interface with this public open space so as to minimise perceived bulk and scale. The width of Belgrave Street at this alignment, as well as the screening trees outside Ivanhoe Park, will further mitigate the visual appearance of the new building as appreciated from the park. Whistler Street, which forms the site's eastern frontage, is a narrow street characterised by a range of built forms with regard to age, scale, and typology, including a new 5-storey mixed-use building currently under construction at 21 Whistler Street adjoining the site to the south. This frontage includes the Inter-War substation building which is listed as a heritage item under the Manly LEP 2013, next to which is currently being developed a new tall-scale building which will be taller than the proposed building subject to the current development application. The substation building, as well as the general fine-grain nature of the narrow street, will remain fully legible and intact as a result of the proposed development, noting in particular that the 5-storey form is not incongruous with the highly mixed character of this street. (iii) Belgrave and Whistler Streets contain built forms up to 5 storeys in height. The proposed scale of the new development is, therefore, commensurate with this established character. Immediately to the site's north, the Pittwater Road HCA is bounded by a 3-storey, late-20th century commercial building, while Raglan Street also contains other 3-storey buildings along this block. To this end, a new 5-storey building on the subject site will not be out of place or visually overwhelming for the locality, especially considering the well-resolved architectural expression it will introduce. The proposed external materials for the new building (light-coloured brick and cement render) and the vaulted roof form are highly complementary to the Inter-War character of Manly, while evoking a suitably contemporary aesthetic befitting the character and prominence of Manly town centre. The new building also demonstrates an appropriate solid-to-void ratio which with respect to traditional detailing.
Townscape Principles Map	
<i>b) Having regard to the features located in the Townscape Principles Maps the following guidelines apply:</i>	(i) The existing building at 42-43 Belgrave Street is not recognised as an important corner site, and its removal will not generate adverse heritage or urban design impacts. Rather, the removal of this building (as well as the others on the site) presents a unique opportunity to redefine this prominent corner of the

Provision	Discussion
<i>(i) Important corner sites shall be maintained, including strongly defined corner buildings. Ensure corner development has strong height and facade elements with building along the street frontage being set by these corner heights. Construct to boundary. Maintain and re-use existing development if it achieves objectives for these corner sites.</i> <i>(ii) Important pedestrian links shall be maintained including existing public arcade links and encourage new through-block arcades which in turn should limit the size of parcels and the bulk of large buildings.</i> <i>(iii) Important end of vista sites shall be acknowledged. Appearance of the street elevation requires special attention at the end of these vistas.</i>	Manly town centre, noting its interface to the highly significant Ivanhoe Park and the Pittwater Road HCA, as a new gateway site to the town centre from the western approach. (ii) No changes are proposed to existing pedestrian links. (iii) The new development will become an important end of vista site from all approaches, owing to its high quality contemporary architectural expression which evokes the established character and significance of Manly as an historic and prominent coastal locale.
Design Details	
<i>c) Design details of proposed developments must complement adjacent building in the locality with particular reference to:</i> <i>(i) the scale, proportion and line of visible facades;</i> <i>(ii) the pattern of openings and the visual pattern of solids to voids on facades;</i> <i>(iii) both the overall wall and parapet height and the height of individual floors in relation to adjoining development and important corner buildings and the height of awnings. See also paragraph 4.4.4; and</i> <i>(iv) materials, textures and colours;</i>	(i) The scale of the new development will complement the 5-storey scale of the existing contemporary mixed-use building at the southern end of the Belgrave Street block (which, itself, also interfaces with an HCA), providing a suitable 'bookend' to this section of Belgrave Street while also not overwhelming the other built forms in the immediate surrounds (which range in scale from 2-4 storeys). The façade of the new development will incorporate an appropriate combination of horizontal and vertical emphasis so as to complement the surrounding built forms. (ii) The solid-to-void ratio of the external façade, at all elevations, is appropriate and sympathetic to the established character of the area while being visibly contemporary. The use of robust external materials – namely brick and cement render – will further emphasise this sympathetic approach. (iii) Across the Belgrave and Whistler Street frontages where the site adjoins other buildings, the development shows regard for established datum lines by providing suitable and

Provision	Discussion
(v) <i>architectural style and the degree of architectural detail; and</i> (vi) <i>the scale of the building footprint.</i>	complementary floor-to-ceiling heights which are expressed externally. (iv) The proposed external materials for the new building (light-coloured brick and cement render) and the vaulted roof form are highly complementary to the Inter-War character of Manly, while evoking a suitably contemporary aesthetic befitting the character and prominence of Manly town centre as an important coastal locale. (v) The development will result in a high-quality contemporary architectural expression befitting the importance of the Manly town centre. Making use of high-quality materials and well-resolved detailing (including the vaulted roofline), the development present an opportunity to mark a new gateway site into Manly's town centre proper while having due regard for its local context. (vi) From a heritage perspective, the building footprint is appropriate and not overwhelming, noting that the locality is characterised by a mostly mixed subdivision pattern. The emphasis on vertical expression at the building's exterior, including at the ground-floor shopfronts, is appropriately responsive to earlier subdivision patterns on the site while maintaining and enhancing the pedestrian experience.
e) <i>Exposed end or side walls must be treated in a consistent manner in terms of colour and materials, avoiding unattractive patterns of different structural and infill elements. See also Figure 5 detailing where greater attention is required to unacceptable end wall design.</i>	All exposed façades have been considered in designing this new development, showing consistency of colour, materials, and finishes. In particular, the prominent north-west and north-east corners of the building (respectively, at the intersections of Belgrave and Raglan Streets and Raglan and Whistler Streets), have been expertly resolved through the vaulted roofline, which provides a sense of open space to the sky above the built form.
f) <i>The ground floor level of premises and arcade links must be at footpath level generally in accordance with Figure 6 of this plan. Where changes in level are unavoidable, they will be made by ramps complying with accessibility requirements.</i>	The ground-floor level will remain at existing street level.
i) <i>Roof structures are to be designed as an integral part of the overall design of a building, and the surrounding townscape.</i>	The playful, vaulted roofline is considered a positive architectural response to the seaside nature of this locality, as well as to detailing found on a number of prominent Inter-War buildings located within it (namely, arched openings). It will provide a sense

Provision	Discussion
	of open space to the sky, which is highly complementary to the coastal nature of Manly.
3.2.1.1 Development in the vicinity of heritage items, or conservation areas	
<i>a) In addition to LEP listings of Environmental Heritage (LEP Schedule 5), this DCP requires consideration of the effect on heritage significance for any other development in the vicinity of a heritage item or conservation area.</i>	This HIS has considered impacts of the proposed development on heritage items and HCAs in the vicinity of the site. It finds that there will be no adverse impacts on the significance of these places as a result of the proposed development.
<i>b) Proposed development in the vicinity of a heritage item or conservation area must ensure that:</i> <i>(i) it does not detract or significantly alter the heritage significance of any heritage items, conservation area or place;</i> <i>(ii) the heritage values or character of the locality are retained or enhanced; and</i> <i>(iii) any contemporary response may not necessarily seek to replicate heritage details or character of heritage buildings in the vicinity, but must preserve heritage significance and integrity with complementary and respectful building form, proportions, scale, style, materials, colours and finishes and building/street alignments.</i>	(i) The proposed development is a well-resolved contemporary architectural example of infill within an established context. It exhibits a scale, form, and detailing which is appropriate for its context and complementary to historical buildings and heritage items in its vicinity. The development will also not generate adverse impacts on the locally-listed and SHR-listed Ivanhoe Park to its west, noting that it will not result in shadow impacts onto this highly significant public open space. The high-quality architecture of the new building, including the sympathetic colour & materials palette and vaulted roofline, will provide a soft and recessive built form interface with this public open space so as to minimise perceived bulk and scale. (ii) The heritage values and character of the locality will not be adversely impacted. While the development proposes the demolition of existing buildings, none of these are found to have any particular historical or architectural importance. (iii) The new building will be noticeably contemporary, however has also been designed to reference characteristics and detailing of historical built forms within the area. This includes the incorporation of appropriate solid-to-voids in the façade, the use of brickwork and cement render as external finishes, and the vaulted roofline which references arched forms commonly found on Inter-War buildings such as those which exist throughout Manly. The proposed 5-storey height of the new building is not found to have adverse heritage impacts. At the Belgrave Street frontage, this scale is appropriate when considering the contemporary 5-storey, mixed-use building at the southern end of the block and also the lack of shadow impacts on Ivanhoe Park. At the Whistler Street frontage, the scale is appropriate having regard for new development currently being developed on the street, including buildings of or above 5 storeys in height. At Raglan

Provision	Discussion
	Street, the mixed character of this frontage will not be adversely impacted by the 5-storey form. Indeed, the perspective along Raglan Street facing east includes views to built forms of a much taller scale closer to the coastline, which on the whole do not detract from the established, lower-scale character of this part of Manly. The new building will be appropriately aligned to the street and will not interrupt, detract from, or alter the established pattern of street-facing activities. The proposed external materials for the new building (light-coloured brick and cement render) and the vaulted roof form are highly complementary to the Inter-War character of Manly, while evoking a suitably contemporary aesthetic befitting the character and prominence of Manly town centre as an important coastal locale.
<i>c) The impact on the setting of a heritage item or conservation area is to be minimised by:</i> <i>(i) providing an adequate area around the building to allow interpretation of the heritage item;</i> <i>(ii) retaining original or significant landscaping (including plantings with direct links or association with the heritage item);</i> <i>(iii) protecting (where possible) and allowing the interpretation of any archaeological features; and</i> <i>(iv) retaining and respecting significant views to and from the heritage item.</i>	(i) The subject site is located with sufficient distance from nearby heritage items so as to fully maintain their legibility and interpretability. While the site has an interface, at Whistler Street, with the listed substation building, the development of other new buildings of similar or taller scale along this frontage will mean that the development which is the subject of this HIS will not result in further impacts to this building. (ii) No significant landscaping will be impacted. (iii) Archaeological investigations do not form part of this HIS. (iv) No views to nearby heritage items will be adversely impacted. However, the introduction of a new infill building of high architectural quality on the site will result in a vastly improved interface with nearby heritage items and the Pittwater Road HCA that what is currently present.

5.3. HERITAGE NSW GUIDELINE CONSIDERATIONS

The table below provides an impact assessment of the proposal against the relevant questions posed in Heritage NSW's *Guidelines for preparing a statement of heritage impact* (2023).

Table 12 – Assessment against the relevant Heritage NSW Guideline considerations

Provision	Response
<i>Do the proposed works affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural</i>	The site is located in the vicinity of HCAs and listed heritage items.

Provision	Response
<i>landscape in which it is sited? Can the impacts be avoided and/or mitigated?</i>	No views to or vistas from listed heritage items and HCAs will be interrupted or adversely impacted by the proposed development. At present, the buildings on the site do not positively contribute to the streetscape or to the setting of these nearby listed places. The proposed development therefore presents an opportunity to vastly improve the contribution of this portion of Belgrave Street to the public domain, including its role as a backdrop to the SHR-listed Ivanhoe Park opposite, through the provision of a high-quality contemporary architectural expression which befits the historical and aesthetic character and values of Manly.
<i>Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?</i>	No adverse heritage impacts will be generated by the proposed development.
Works adjacent to a heritage item or within the heritage conservation area (listed on an LEP) <i>Will the proposed works affect the heritage significance of the adjacent heritage item or the heritage conservation area?</i> <i>Will the proposed works affect views to, and from, the heritage item? If yes, how will the impact be mitigated?</i> <i>Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?</i>	As discussed throughout this assessment, the proposed development will generate a positive impact on the setting of nearby heritage items and HCAs, owing to the removal of existing buildings which do not meaningfully contribute to the values or character of the local area and the introduction of new, architecturally-designed infill on this prominent corner location. To this end, views to and from heritage items and HCAs will also be positively affected as a result of the development, noting that the new building will result in a ready distinction between historical and contemporary buildings as demonstrative of the ongoing evolution of the local area.

6. CONCLUSION & RECOMMENDATIONS

6.1. GENERAL CONCLUSION

This HIS has been prepared to accompany a development application for the demolition of existing buildings and the construction of a new, 5-storey mixed-use building at 35-43 Belgrave Street, Manly. This report has found that:

- The existing building at 35-39 Belgrave Street is found to not fulfil the criteria for heritage listing, and its proposed demolition as part of this development will not generate any adverse heritage impacts.
- The subject site is located with sufficient distance from nearby heritage items so as to fully maintain their legibility and interpretability. While the site has an interface, at Whistler Street, with the listed substation building, the development of other new buildings of similar or taller scale along this frontage will mean that the development which is the subject of this HIS will not result in further impacts to this building.
- The development will not result in any shadow impacts to the LEP- and SHR-listed Ivanhoe Park opposite the site, thereby not resulting in any adverse impacts to this highly significant public open space.
- The development will result in a high-quality contemporary architectural expression befitting the importance of the Manly town centre. Making use of high-quality materials and well-resolved detailing (including the vaulted roofline), the development presents an opportunity to mark a new gateway site into Manly's town centre properly while having due regard for its local context.
- The introduction of a new infill building of high architectural quality on the site will result in a vastly improved interface with nearby heritage items and the Pittwater Road HCA that what is currently present.

The proposed development will, therefore, not generate any adverse heritage impacts and is recommended for approval from a heritage perspective.

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