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PROPOSED MIDDLE HARBOUR ROAD HERITAGE CONSERVATION AREA, LINDFIELD: PEER REVIEW

I refer to the Council's current review of heritage conservation areas and specifically to The Middle Harbour Road Heritage Conservation Area proposal.

I have been requested to review the information prepared to date by residents in the area and provide an independent assessment of whether I professionally believe the area warrants Heritage Conservation Area status. I do not believe the area warrants a Heritage Conservation Area status.

I have been a professional heritage consultant for over 30 years. I have been an elected member of Woollahra Council and assisted in the heritage controls for that area. I am currently Chair of the NSW Heritage Council.

I have had the opportunity to inspect the area, assess Council's documents and to review the assessment prepared by Architectural Projects, 2017. (AP)

The Architectural Projects documents have clearly set out the difference between contributory, neutral and detracting places within the defined boundary. I have reviewed their assessment of the earlier Perumal Murphy Alessi, 2015, Study. (PMA)

In the methodology AP quotes the NSW Heritage Guidelines in saying that "heritage conservation boundaries should be simple to explain to the public". The issue for this area is that residents of the area are having trouble recognising the quality of the area as a heritage conservation area, due to the fact that the significance is not reflected on the ground and that the planning technique of a conservation area designation is not appropriate to manage this proposed area.

I agree that there are individual dwellings in the area with individual merit and these have been assessed as individual items.

The survey carried out by AP proves that the area has less than 40% of the dwellings that are recognised as 'contributory items' I have not redone the survey graphically however I consider that there are even more dwellings that do not meet the threshold of contributory. The Land and Environment Court NSW has recognised that there are buildings that contribute more and less and I consider that there are a number of dwellings in the proposed area that are of a lesser contribution, even within the numbers under 50%. These dwellings have been analysed in the AP review and some of those considered contributing are in my opinion are of a minor contributing value.

The area is a very mixed one with large numbers of dwellings which have undergone alteration and change. There is little cohesion in typology and little cohesion in quality in the area. The principle cohesion is the detached dwelling type and the setting of these buildings in well vegetated

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streetscapes and front gardens. The area is "attractive", however the Court warns of the sense of "attractiveness" against the rigour of the real contribution the individual elements make to the whole.

It is not always reasonable to expect a modified or a very pedestrian example of the interwar period to be retained on a site which has the opportunity to be developed with a larger family dwelling. I always ask three questions:

What is the significance?

What is the context? and

What are the opportunities?

The AP study has proven that there are less than 40% of the dwellings which are contributory to the area in a meaningful manner. The context is therefore one of a mixture of dwellings of styles and sizes that have very little relationship to each other aesthetically. One has to evaluate the buildings as they currently exist and not depend on a historical examination that does not bear witness on individual survey.

The issue for this area is that since the original surveys - which did not recommend the making of a conservation area - many of the dwellings have been demolished or significantly altered and added to. There has been the level of expectation that even well recognised "contributory" dwellings of the period have been consented to be demolished. In this regard, and having evaluated the recommendations of the Architectural Projects report, the area has lost the inherent qualities that make it a conservation area under the current professional guidelines.

One of the common attributes of ongoing heritage studies is that many more places are placed on potential lists as the surveyors work to increase the numbers. It has been my experience that many of the earlier surveys - or the first to review an area - provide a more accurate picture of the qualities that make up a conservation area. There are always the individual exceptions that can be found or have been overlooked but this is a rarer occurrence and should not necessarily extend to larger numbers being included because they are borderline. The reality of listing is something that should be taken seriously and have the due regard that is warranted. This is the approach that has been undertaken by the Architectural Projects review.

I support the recommendations of Architectural Projects not to include the precinct as a heritage conservation area and commend the rigour that has been applied to its evaluation.

Yours sincerely,

Stephen Davies
Director

Architectural Projects

1599 – The Middle Harbour Road, Lindfield Heritage Conservation Area Review

July 2017

Architectural Projects ▪

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1599 – THE MIDDLE HARBOUR ROAD, LINDFIELD HERITAGE CONSERVATION AREA – REVIEW

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1. INTRODUCTION

This report has been prepared for submission to Ku-ring-gai Council, in response to the June 2017 statutory public exhibition of the planning proposal to heritage list Middle Harbour Road heritage conservation area. Architectural Projects have been engaged to update the 2015 report, by the Middle Harbour Road residents.

This report considers the component significance of buildings on Middle Harbour Road and additional properties within the overall Conservation Area. This review is informed by a review of all reports undertaken on the Ku-ring-gai Conservation Areas and the methodology of the Southern Ku-ring-gai Conservation Areas by Architectural Projects 2011. A physical inspection of the houses was undertaken in May 2015 and again in June 2017.

2. HISTORY OF REPORTS REGARDING MIDDLE HARBOUR ROAD AREA SIGNIFICANCE

Ku-ring-gai Conservation Areas have been the focus of numerous studies since 1987: the 1987 Heritage Study, the 1995 National Trust Inter-war Study, the Godden Mackay Logan studies of the last 10 years, the Paul Davies Ku-ring-gai Town Centres Studies Heritage Conservation Area Review 2008 and Paul Davies Ku-ring-gai Potential Heritage Conservation Area North Review 2010, and the Southern Ku-ring-gai Conservation Areas Review by Architectural Projects 2011. The Southern Ku-ring-gai Conservation Areas adopted by Council excluded the area within the proposed Middle Harbour Road heritage conservation area due to the extent of development already existing. Since that time further development has occurred that suggests an even lower level of integrity.

3. HISTORY OF THE PROPOSED MIDDLE HARBOUR ROAD HERITAGE CONSERVATION AREA

Middle Harbour Road was part of Clanville, the original land grant to DD Mathew. It was subdivided as a map of the Lindfield Heights Estate. Middle Harbour Road formed part of the Dering Clanville Estate and Tryon, Howard and Owen streets formed part of the Seldon Estate.

4. SIGNIFICANCE OF THE PROPOSED MIDDLE HARBOUR ROAD HERITAGE CONSERVATION AREA

The significance of the area within the proposed Middle Harbour Road Heritage Conservation Area has low significance as a much altered part of the Interwar development of the Clanville and Seldon estate.

5. METHODOLOGY FOR DEFINING CONSERVATION AREA BOUNDARIES

The criteria for defining Conservation Area boundaries are based on the NSW Heritage Office guidelines, which stress the importance of boundaries reflecting historic development patterns based on subdivision patterns, rather than only an aesthetic and physical inspection.

"Boundaries will be influenced by factors such as changes of land use, building scale, form, arterials, setbacks, architectural periods, abrupt changes in street patterns and widths, and concentrations of early buildings and sites.

Where the significance of a heritage area is related to an historic event, the boundary will reflect the documented facts about that event."

"Generally, heritage area boundaries should be simple to explain to the public. This will make it easier to win support. Railways, freeways or major roads can form firm edges. Up to date base maps are essential."

" In the end boundary definition comes down to making practical decisions based on the following questions:

- *Why is the area significant? (answered through historical research and comparative evaluation)*
- *How is that reflected on the ground? (answered by detailed field survey and visual analysis)*

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- *What are the appropriate planning techniques for its conservation? (answered by selecting only those techniques that apply to the particular type of significance)*
- *What sort of boundaries will suit the important evidence and the conservation planning options?*[1]

6. HISTORICAL RESEARCH

6.1. NATIONAL TRUST INTER-WAR STUDY, GODDEN MACKAY LOGAN STUDIES HISTORICAL RESEARCH

Middle Harbour Road is not included in the National Trust Inter-War Study which was a state wide physical survey supported by state wide historical research. The Godden MacKay Logan March 2002 Study undertook a development history of the Conservation Area via subdivision analysis. Middle Harbour Road is not included in this study.

6.2. ADDITIONAL RESEARCH

As part of the 2015 review, Architectural Projects undertook the compilation and examination of subdivision maps Appendix 2, Water Board maps Appendix 3, and historic aerial photos Appendix 4.

The preliminary subdivision mapping indicates that many of the buildings that have been identified as contributing components have large detracting additions in the style of the original, which transform the building from contributing to detracting. On the basis of this mapping we have identified a lower percentage of contributing buildings within the streetscape and therefore are not of the opinion that the streetscape reaches the threshold for listing. The streetscape includes established planting, which enhances the streetscape and conceals many of these detracting components. The methodology for mapping Conservation Area's is primarily based on the significance and integrity of the building components.

The review of the area in 2017 has confirmed this discrepancy explained by the thresholds used in the assessment of contributing items, discussed in Section 7 and 8 of this review.

7. REVIEW OF FIELDWORK

The 2017 and 2015 assessment of Middle Harbour Road and properties in the proposed HCA indicate an even lower level of integrity with the original contribution map undertaken by Architectural Projects in 2010. Architectural Projects 2017, 2015 and 2010 survey and assessment are not consistent with the high number of contributing components identified in the Perumal Murphy Alessi Study and subsequent Council assessment in 2016 (PMA Report). The criteria stated in the PMA Report are that the contributing components are recognizable intact buildings from the key period. However the established methodology used identifies second stories added to original one storey buildings as contributory. This methodology is inconsistent with the criteria stated in the PMA Report, where second story to one storey contributing components should be assessed as overall neutral even if the original can be recognized because the shift from one storey to two storeys is a radical shift in typology. If the second storey is setback behind the contributing component then the building can remain contributory.

As part of the 2017 Architectural Projects review, the following 19 properties, classified as 'contributory' in the Middle Harbour Road, Lindfield HCA Review – Revision – June 2016 were also assessed. These properties have been found to be incorrectly classified and should be classified as neutral or detracting – refer to Appendix 10:
9 Short Street, 4 Valley Road, 9 Valley Road, 2A Owen Street, 9 Owen Street, 21 Owen Street, 55 Trafalgar Street, 59 Trafalgar Street, 43 Tryon Road, 61 Tryon Road, 63 Tryon Road, 73 Tryon Road, 38 Middle Harbour Road, 46 Middle Harbour Road, 67 Middle Harbour Road, 73 Middle Harbour Road, 89 Middle Harbour Road and 91 Middle Harbour Road

[1] 'Conservation Areas, Guidelines for Managing Change in Heritage Conservation areas', Heritage Office and Department of Urban Affairs and Planning

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This misclassification of properties is significant because the overall percentage of contributory properties for the proposed Middle Harbour Road HCA reduces to 39%, significantly below the 50% threshold required by Council to satisfy the conditions of a HCA. With respect to Middle Harbour Road itself, the percentage of contributory properties is 46% - refer to Appendix 11.

Furthermore, the Council report has also not included the known development approvals for demolition and major alterations to contributory properties as part of the HCA assessment. The inclusion of such information would further reduce the overall percentage of contributory properties within the proposed Middle Harbour Road heritage conservation area. 52 Middle Harbour Road and 19 Owen Street are examples of contributory items with approval for demolition.

The Middle Harbour Road, Lindfield HCA Review – Revision – June 2016 highlights one detracting property in the proposed HCA, at 1 Howard Street. A physical inspection identified a minimum of 46 detracting properties in the proposed HCA or 22% of properties are detracting. Refer to Appendix 9 – List of Detracting Properties.

8. BACKGROUND TO ASSESSING CONTRIBUTORY PROPERTIES WITHIN A HCA

8.1. LAND & ENVIRONMENT COURT PRECEDENTS

The guideline publication 'Conservation Areas', published by the Heritage Office of the OEH provide the established approach for assessment of Contributory Properties within a HCA. The recent Land and Environment Appeal Form Architects (Aust) Pty. Limited v Ku-ring-gai Council [2017] provides confirmation of the importance of this methodology with the court framework.

For the purpose of this matter, Contributory Properties are buildings and sites within a HCA which are deemed to exhibit one or more of the following characteristics:

1. buildings and sites that make an **important contribution** to the character and significance of the HCA. They can be from a key historical layer, true to an architectural type, style or period, or highly or substantially intact including their garden setting. Where subdivision has occurred, the subdivision is within the key historical period or the area.
2. buildings and sites which are **altered** from their original form but are **recognizable** and could be reasonably reinstated to that condition or the alterations are not considered to be detrimental to the integrity of the building; for example, a building that has been **rendered or painted** or where the roof cladding has been replaced but the form is otherwise legible.
3. buildings and sites with new layers/additions sensitive to the style, form, bulk, scale and materials of the original building.

Note: Contributory buildings do not necessarily need to be high-quality buildings **but should represent the key historical period** of the HCA. A HCA may also contain high-quality buildings which are not necessarily from the key historical period.[2]

Appropriate criteria should be used for identifying a property as contributory to the heritage significance of a HCA, as dictated by the guideline publications including 'Conservation Areas', published by the Heritage Office of the OEH. Most commonly, a building is contributory to the collective significance of the HCA if it dates from the key period of development when most of the development identified as significant to the HCA occurred ... Contribution to the significance of an HCA is about collective value and not necessarily individual genius; and the identification of contributory

[2] Form Architects (Aust) Pty. Limited v Ku-ring-gai Council [2017] Clause 14.

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buildings should be based on historical research and evidence, including studying the subdivision maps, 1930s Water Board maps and aerial photographs. **It is inappropriate, in her view, to simply identify a property as contributory because you like the look of it, as that would constitute an uninformed assessment.**[3]

The assessment of buildings that make up a HCA must be based on **objective criteria, or else the process of identifying contributory buildings and landscapes in a HCA is entirely subjective, unrobust and unjust.**[4]

8.2. CORRESPONDENCE FROM DEPARTMENT OF PLANNING AND ENVIRONMENT

The Department issued 2 letters to Ku-ring-gai Council on 20th October 2016 in response to a request for a Gateway Determination which suggested referral to the Heritage Office and Planning Proposal to amend KLEP 2015

- The Department notes a number of objections received during a prior non-statutory exhibition of the proposal. A privately commissioned counter-study, conducted by Architectural Projects (May 2015), advised that there is insufficient merit in listing the conservation area.
- In view of submissions made to Council, and the Architectural Projects Study, a council heritage officer and a heritage specialist conducted site visits and review.
- The re-assessment by PMA showed a lower number of contributory items (i.e. 30 less items) than identified in the initial PMA Review, making only 50.96% of the buildings being considered as contributory.
- Council has confirmed that it has interpreted that most of the buildings (greater than 50%) need to be contributory to warrant the identification of the conservation area.
- In the report to Council, it is noted that should the borderline buildings be rated as neutral the overall contributory buildings falls to 48%.This would not reach the minimum number required to justify a conservation area

The Department finds that the PMA Heritage Study has been undermined by the Architectural Projects Study and Councils review of the area. The borderline nature of the balance between the contributory, neutral and detracting elements are noted and, therefore, it may be questionable whether sufficient merit exists for identification of the heritage conservation area.

It is recommended that:

- Councils supporting study be reviewed to include consideration of the findings of the Architectural Projects Study and Councils own review of the area, and that the planning proposal be amended by Council accordingly;
- following amendment, the revised planning proposal should be submitted to the Department for approval prior to exhibition; and,
- additional consultation is to occur with the Heritage Office prior to exhibition, once the study and planning proposal have been reviewed.

Planning Proposal to amend KLEP 15 noted

I note the nature of the balance between the contributory, neutral and detracting elements in the proposed conservation area, and that there remains a question over the merit of the area being identified as a heritage conservation area. Given the differences between the heritage studies stronger justification is required for the imposition of the proposed conservation area. The supporting study is to be reviewed to address the results of the site inspection undertaken by Council officers and the findings of the Architectural Projects Study.

[3] Form Architects (Aust) Pty. Limited v Ku-ring-gai Council [2017] Clause 25.

[4] Form Architects (Aust) Pty. Limited v Ku-ring-gai Council [2017] Clause 30.

I note Council has written to the NSW Heritage Council for its comments on the planning proposal. While objections have not been raised to the proposal on behalf of the Heritage Council, given local interest in the proposal, the determination has been conditioned for further consultation with the Office of Environment and Heritage prior to community consultation.

The Kur-rin-gai Council Planning Proposal Submission noted
The proposed Clanville HCA boundary was then reduced to exclude the subject area of Middle Harbour Road and its surrounds due to the perceived introduction of unsympathetic additions to the area that would rate the overall level of intactness of the HCA as below the threshold for inclusion. As a result the current proposed Middle Harbour Road Conservation Area did not proceed to listing. (p1)

8.3. INCONSISTENCIES NOT ADDRESSED BY KU-RING-GAI COUNCIL IN THEIR RESPONSE TO THE DEPARTMENT OF PLANNING AND ENVIRONMENT

Ku-ring-gai Council prepared Appendix F – Proposed Middle Harbour Road Heritage Conservation Area: Explanation of review of contributory ratings, in order to satisfy Condition 1 of the Gateway Determination.
Architectural Projects notes that the following inconsistencies between the Architectural Projects 2015 study of Middle Harbour Road and Council's own review of the area have not been addressed in Council's re-submission to the Department Appendix F.

- Properties 41, 57, 71, 75, 104, 102, 100, 94, 96, 92, 90, 86, 84, 80, 78, 72, 68, 36, 62 and 106 Middle Harbour Road in the AP 2015 report were classified as Detracting. These properties are clearly out-of-character in terms of scale, bulk, form and style of the federation and inter-war period. The significance of having a large proportion of detracting properties in a proposed HCA highlights the development of the area and demotes the value of intactness. Appendix F does not address these inconsistencies.
- Council's Middle Harbour Road, Lindfield HCA Review – Revision – June 2016 contribution map submitted to the Department of Planning and Environment only highlights 1 detracting property in the proposed HCA, at 1 Howard Street. A 2017 physical inspection, in addition to the Architectural Projects Review 2010 and 2015 identified 46 Detracting Properties in the proposed HCA or 22% of properties are detracting. Refer to Appendix 9 – List of Detracting Properties.
- Property 67 Middle Harbour Road in the AP 2015 Report was identified as Neutral, because of its dominant 2nd storey addition and painted brickwork. Council has classified the property as Contributory, and has not addressed the inconsistency in its submission to the Department.
- Ku-ring-gai Council's Attachment F Review discusses the identification of borderline buildings as contributory and notes *a description of "BL tending to N" means the property is borderline and the rating given is neutral and a description of "BL tending to C" means the property is borderline and the rating given is contributory.* The lack of a rigorous review of borderline examples has inflated the number of contributory and neutral components and provided a false impression of the integrity of the area.

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***Appendix F** also provides an explanation of individual property ratings where Council has amended them from what was proposed in the PMA Study, and where they are different to the Architectural Projects submission .(p3)*

The lack of ability to differentiate between faux heritage houses and contributory buildings is a flaw of the report.

8.4. INCONSISTENCIES WITHIN KU-RING-GAI COUNCIL'S SUBMISSION TO THE DEPARTMENT OF PLANNING AND ENVIRONMENT

The PMA Middle Harbour Road HCA review June 2015 (unpaginated) notes
This evolution has continued to the present with a number of highly modified and new houses also located in the area. These are generally considered to be "neutral" and have not been identified as they do not relate to the primary, early 20th century subdivision and development of the area.

Contributory buildings - The identification of contributory items is based on the style, condition and integrity of each property and how it relates to the historical development and identified cultural significance of the area...
The visibility and visual contribution and presentation to the streetscape and area in particular were noted...
Consideration has been given to this requirement for change and the contributory items have been assessed with consideration of the degree of change and its impact on the historical and visual character of the item and its contribution to the area when viewed from a public place.

Neutral buildings - are those which do not relate to the primary period of development of the area.

Detracting buildings - are those which are out-of-character in terms of scale, bulk, form, style.

The review by Ku-ring-gai Council refers to out of scale first floor additions and dormers and garage/carport which obscure the original buildings. Under the criteria this would exclude these buildings as heritage items.

*The total number of contributory buildings has to be at least greater than 50% for the area to be considered for inclusion in a HCA. The Ku-ring-gai Council study area states that there are 51% contributory buildings. This assessment includes those buildings which are borderline such as those who have undertaken changes **which may be reversible**, like **infill of verandahs** and the inclusion of **unattached carports** forward of the front building line. These changes, however, cannot be ignored as they can be used in court by appellants **to demonstrate changes that Council** deems acceptable to contributory places even when n they are contradictory to Council's development controls.*

It is unlikely that carports forward of the building line (attached or unattached) and ***upper level visible unsympathetic alterations** like dormer windows on the front façade, and additions to the rear which are clearly visible to the street* are likely to be removed and therefore these buildings should be listed as neutral. ***This identifies a further flaw in methodology used and the mis-classification of buildings in the PMA 2015 report and subsequent Council review.***

Houses with **clearly unsympathetic alterations** would render the building detracting or unrecognizable not contributory or neutral.

The following extract of the Middle Harbour Road HCA review 2016 by Ku-ring-gai Council indicate a lower threshold for contributory listing including second storey additions and changed roof forms and dominant garages.

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STREET	*PERUMAL MURPHY ALESSI 2015 REVIEW*		*SUBMISSION*	*COMMENT*
Tryon Road	*37*	*N*		*N* *(built after key period, mid-late 20th Century)*
	39	*N*		*N* *(built after key period, recent)*
	47	*C*	*Object the inclusion of the property in a HCA (alterations and additions undertaken three times since the 1980s.*	*C* *(some alterations with bay windows added and side entrance. Retains overall external form, use of materials and garden setting. Corner site)*
Nelson Road	*2*	*C*		*N* ***(Second storey addition** 2011. 1943 aerial shows single storey house with hipped roof and 1 projecting bay with gable. House has been rendered. New first floor addition DA0094/11)*
Valley Road	*7*	*C*		*N* ***(Completely new second floor** i.e. not within roof. Confirmed on 1943 aerial)*
	14	*C*	*Object the inclusion of the property in a HCA* *(submission does not provide any justification for removal)*	*N* *The roof form has changed from the 1943 aerial with the removal of a front gable. Windows have been replaced with french doors. There is DA approved for a total revamp of the building including a **second storey** as a faux over-scaled interwar bungalow.*
Valley Lane	*11*	*N*	*Object the inclusion of the property in a HCA* *(recent house)*	*N* *(built after key period, recent)*
	8	*N*		*N* *(built after key period, recent)*
	16	*N*		*N* *(built after key period, recent)*
	18	*N*		*N* *(built after key period, recent)*
Short Street	*17*	*N*		*N* *(built after key period, recent)*
	19	*C*		*N* ***(Unsympathetic dormers** and additions. Very clear that these are*

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STREET	*PERUMAL MURPHY ALESSI 2015 REVIEW*		*SUBMISSION*	*COMMENT*
				additions and confirmed by 1943 aerial)
	6	*N*	*Object the inclusion of the property in a HCA (recent house)*	*N (built after key period, recent)*
	8	*N*		*N (built after key period, recent)*
Howard Street	*5*	*C*		*N (Previously a modest house with small standalone garage. DA approved 2006 created new wing on western side with integrated garage and first floor above.* ***No longer resembles the original bungalow)***
	7	*C*		*N (**Unsympatheticpop-top.** Pop-topforms theridgelineforan expansive extension to the rear. Not likely to be reversed)*
	14	*C*		*N (Simple cottage with **oversized dormer additions** (not realistically reversible).*
Owen Street	*3*	*C*	*Object the inclusion of the property in a HCA (significant alterations to the front facade not true to the era)*	*C Borderline - Verandah windowed in. (alterations to the front elevation including fenestration, new windows, side entrance and modified garden)*
	23	*C*		*N Integrated double garage at the front. Window in front facing gable.* ***New roof and ridgeline (large gable added).***
	2A	*N*	*Object the inclusion of the property in a HCA (submission does not provide the justification for removal)*	*C (building is present on the 43 aerial. It is representative of the Inter-war period. Due to the scale of the original building the addition to not detract from the contribution value of the original building).*

STREET	*PERUMAL MURPHY ALESSI 2015 REVIEW*		*SUBMISSION*	*COMMENT*
	8	*C*	*Object the inclusion of the property in a HCA (extensively modified)*	*N (**substantial additions**, including substantial upper floor additions, alterations to the front elevation and verandah, new windows and gabled front elevation, visible rear additions)*
	18	*C*	*Support the inclusion of the property in a HCA*	*N Large new gable with window. Integrated gabled **carport forward** of the front building line.*
Trafalgar Avenue	*73*	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*C Borderline (Bungalow retains form but **unsympathetic carport** forward of the front building line)*
Middle Harbour Road	*55*	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N (**two-storey, large scale**, recent fabric resembling traditional style/detailing)*
	61	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N (**overscaled first floor addition**, carport forward of the front building line.)*
	79	*N*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*C Borderline - (Building form unaltered. Painted. Verandah has been windowed in. Garage is attached but not forward of the front building line. Garage recessive colour and flat roofline)*
	87	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N Hipped carport to the front. **Dominant and detracting pop-top.***
	101	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N (recent, inconsistent with the prevailing character of the area)*
	103	*C*		*N (**two-storey**, rendered, enclosed verandah, new fabric)*
	109	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N (substantial alterations to the front elevation, **upper floor addition**, rendered, windows added, side entrance)*
	38	*C*		*N*

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STREET	*PERUMAL MURPHY ALESSI 2015 REVIEW*		*SUBMISSION*	*COMMENT*
				*(substantial alterations to the front elevation, **upper floor addition**, rendered, windows added, side entrance)*
	52	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*C (alterations to the front elevation, carport, painted. Retains evidence of overall external form and scale)*
	72	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N **Roof form completely changed** from 43 aerial. Odd dormer/pop-top addition. Hipped roof carport in front setback.*
	78	*C*		*N New house*
	82	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*C Agreed the house is contributory but the front **garage is detracting**.*
	96	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N **New second storey**. Visible change has occurred from 43 aerial. Large carport forward of front building line. Can see chimneys on original ground floor are much lower than the height of the second storey roof line. As a cluster the 3 houses 92, 94 and 96 are detracting.*
	106	*C*	*Object the inclusion of the property in a HCA (refer to AP 2015 survey)*	*N In the 43 aerial it is a vacant lot. It is a 1970s development and is not from the key development period. It may be a **potential heritage item***

Recent material on Council's website suggests a proposal to list smaller groups of buildings within the conservation area. The listing of a smaller group is usually based on a higher level of integrity than buildings within a conservation area.

A further factor to consider is the management of the conservation area by Ku-rin-gai Council. The grading is rarely reconsidered on the basis of new research. Despite the DCP noting that contributing components can be demolished the practice is to retain buildings identified as contributory, those from the key period of significance. The inappropriate listing of houses as contributing or neutral can have significant limitation to future development.

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9. RECOMMENDATIONS

On the basis of 25 years of study it is clear that Middle Harbour Road area has been excluded as part of the Conservation Area identified by the National Trust and Ku-ring-gai Council. Many of the Conservation Areas were developed initially in response to the construction of the North Shore railway. The construction of the Sydney Harbour Bridge resulted in an important inter-war development overlay so that the area has a dominant inter-war appearance. The current boundaries of existing Conservation Areas address this significance.

The proposed Middle Harbour Road Conservation Area does not reach the threshold at below 40% for listing as a Heritage Conservation Area. It is not recommended that Ku-ring-gai Council amend LEP 2015 to include the proposed Middle Harbour Road Heritage Conservation Area for the following reasons:

- The methodology used by Kur-rin-gai Council has a low threshold for identification of contributory buildings. The study fails to recognize the extent of modification to many of these buildings. The Office of Heritage suggested that more detailed research be conducted to determine the extent of modification. This has been refuted by the PMA response.

- A material number of items within the proposed Heritage Conservation Area have been incorrectly rated as 'contributory' and 'neutral' in the Middle Harbour Road, Lindfield HCA Review – Revision – June 2016 mapping which undermines the integrity of information within the report and the justification to make the area a HCA.

- A review of the Middle Harbour Road area has confirmed that many of the buildings are altered in two ways; (1) Buildings have infill verandas or have been painted which is reversible and (2) Buildings include carports forward of the building line and dominant garages and additions to the original building. These are unlikely to be reversed. There are also a series of new houses and significant alterations that have rendered the buildings detracting to the significance of the area. These are incorrectly identified as neutral.

- Ku-ring-gai Council has not included development approvals as part of the HCA assessment and which would further erode the merit of the HCA.

- The existing situation does not support the Conservation Area listing. The Council report notes that if some of the borderline buildings were downgraded from contributory to neutral the listing would drop to 48%. These are all further indications that the area does not reach the threshold for listing.

This is now the third time this area has been considered and each time the threshold is not reached. It is now appropriate to officially exclude this area. Listing of this area which has a low level of integrity would undermine the justification of the other newly created areas in Ku-ring-gai Council.

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APPENDIX 3	Middle Harbour Road - Water Board Maps
APPENDIX 4	Middle Harbour Road - Aerial Maps
APPENDIX 5	Middle Harbour Road, Lindfield HCA Review – Revision – June 2016 Contribution Map
APPENDIX 6	Middle Harbour Road Conservation Area Contribution Map – Architectural Projects 2010
APPENDIX 7	Middle Harbour Road Conservation Area Contribution Map – Architectural Projects 2015
APPENDIX 8	Photographs of the houses in proposed HCA
APPENDIX 9	List of Detracting Properties
APPENDIX 10	2017 AP Review of Additional Properties
APPENDIX 11	Comparison of Reviews Middle Harbour Road

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APPENDIX 1 - SUMMARY OF REPORTS REVIEWED ON KU-RING-GAI CONSERVATION AREA

HISTORY OF REPORTS

The 1987 Heritage Study
The 1995 National Trust Inter-war study – Scott Robertson
Godden Mackay Logan Keys, Young Residential Design Strategy, Ku-ring-gai Heritage & Neighbourhood Character Study, February 2000
Godden Mackay Logan Ku-ring-gai Urban Conservation Area, Stage 2 + 2a, March 2002
Godden Mackay Logan Ku-ring-gai Urban Conservation Area, Stage 3 October 2003
Godden Mackay Logan Ku-ring-gai Urban Conservation Area, Stage 4, July 2005
Ku-ring-gai Town Centres Heritage Conservation Areas Review, Paul Davies Pty Ltd, September 2008
Ku-ring-gai Potential Heritage Conservation Area North Review Conservation Area, Paul Davies, October 2010
Ku-ring-gai Potential Heritage Conservation Area South Review Conservation Area, Architectural Projects, January 2011

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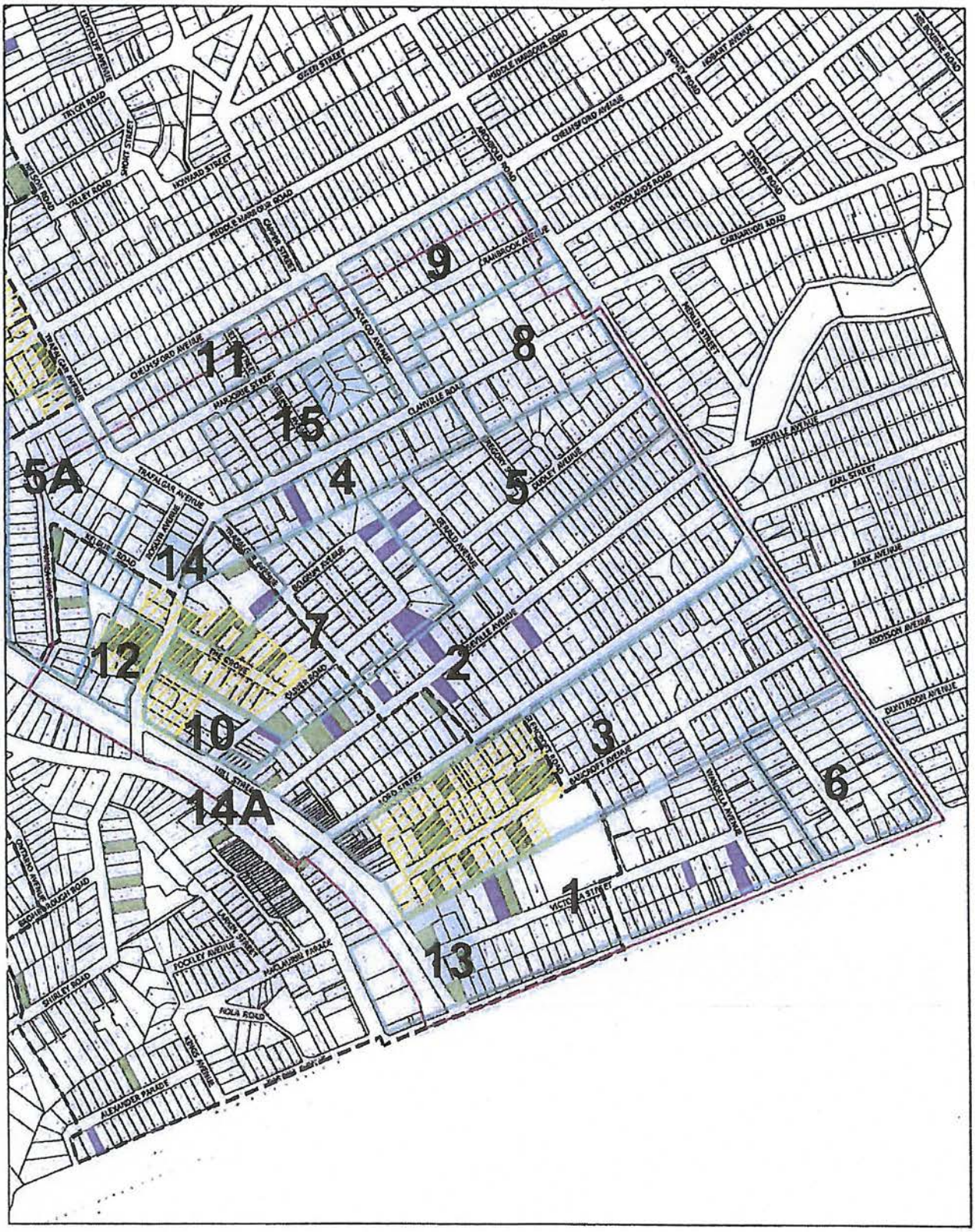
APPENDIX 2 – MIDDLE HARBOUR ROAD - SUBDIVISION MAPS



Legend

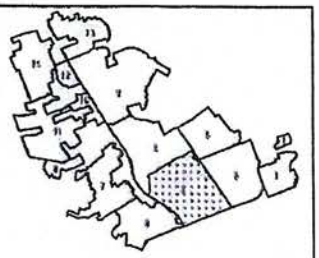
- STUDY AREA
- TOWN CENTRE LEP BOUNDARY
- LEP HERITAGE CONSERVATION AREAS
- HERITAGE LISTED PROPERTIES
- POTENTIAL HERITAGE ITEMS

0 65 130 260 390 Metres

Study Area
Number 3

ROSEVILLE

Aug 18, 2010



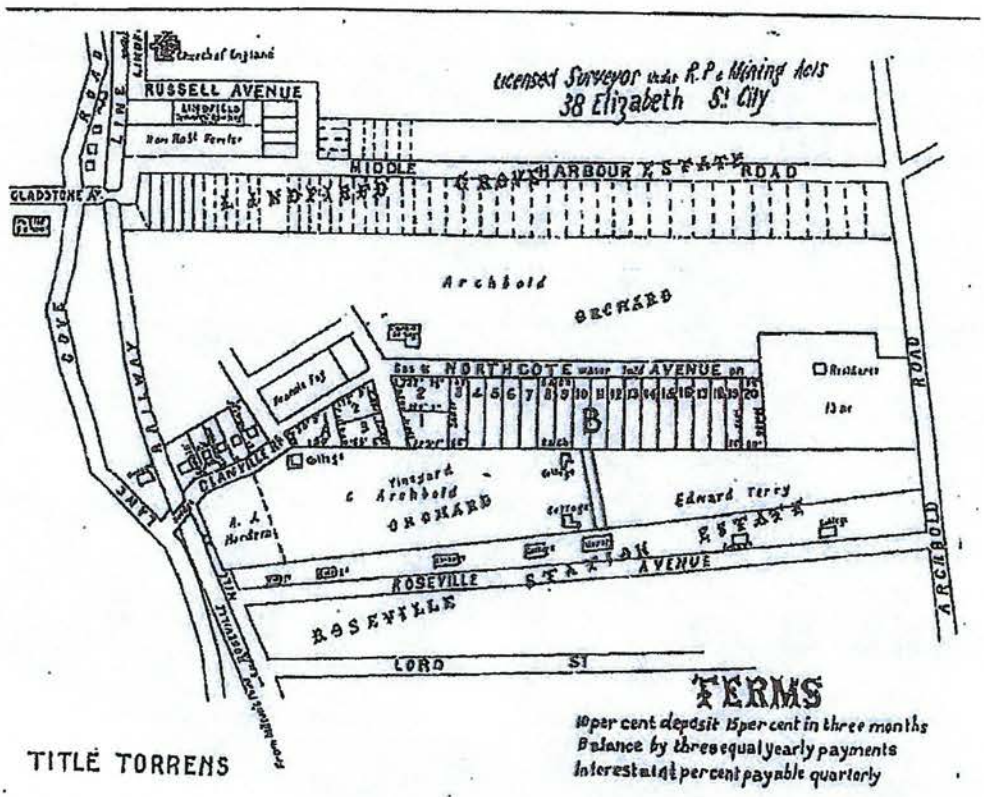
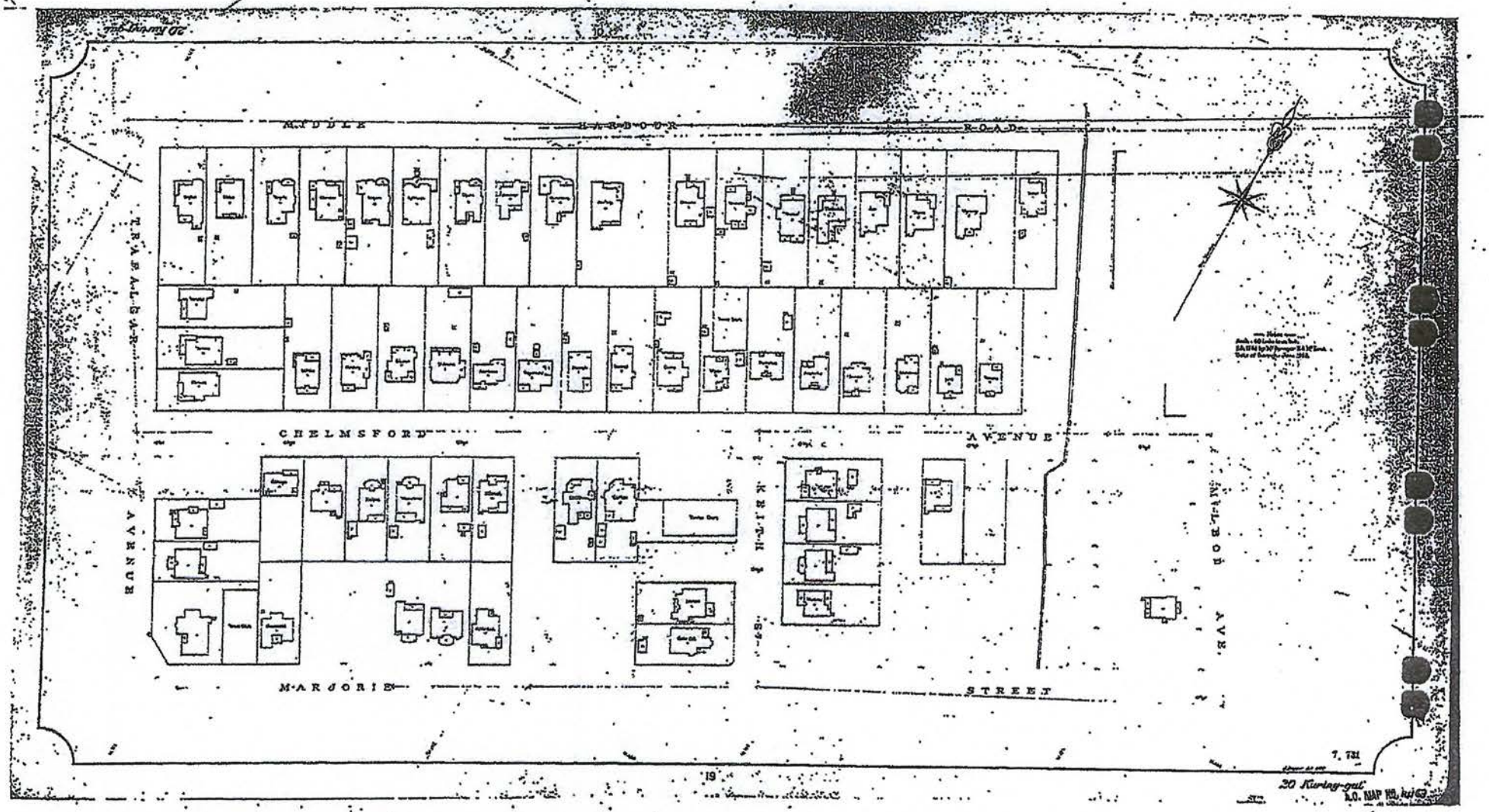


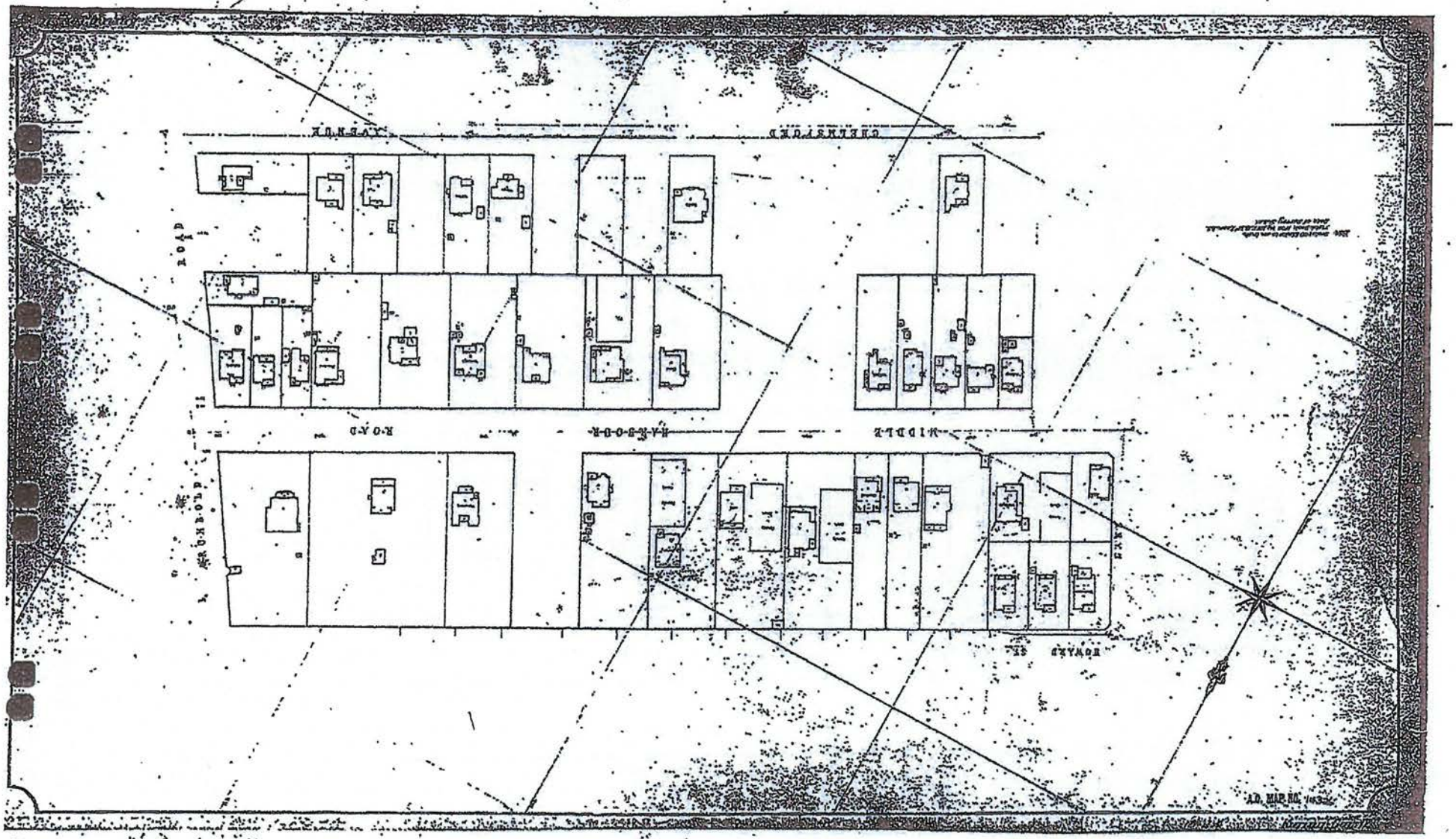
Figure 4.1 Extract from a diagrammatic map of the *Lindfield Heights Estate* showing the landholdings of two sons of Richard Archbold. Middle Harbour Road is beyond the boundary of UCA 3, but was part of Clanville, the original land grant to DD Mathew, which extended from Boundary Road in the south to Tryon Road in the north.

APPENDIX 3 - MIDDLE HARBOUR ROAD - WATER BOARD MAPS

© Architectural Projects Pty Limited


MIDDLE HARBOUR ROAD
TRAFALGAR AVENUE
CHELMSFORD AVENUE
KERTON AVE.
MARGORIE STREET
19
7.731
20 Kurlong-gal
A.O. MAP No. 1463

CA3


ROYALS ST.
MIDDLE
HARBOR
ROAD
OXFORD
DYER
ROAD
CHELMSFORD
AVENUE

1927

9

APPENDIX 4 - MIDDLE HARBOUR ROAD - AERIAL MAPS

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1943

AVON ROAD
HELSON ROAD
VALLEY ROAD
HIGHLAND STREET
RICHMOND ROAD
CUPERMSTONE AVENUE
HIGH STREET
MIDDLE STREET
ARUNDEL AVENUE
GRANVILLE ROAD
CORNWALL AVENUE
WARWICK AVENUE

2015

TRYON ROAD
SHORT STREET
NELSON ROAD
VALLEY LANE
VALLEY ROAD
HOWARD STREET
ARCHBOLD ROAD
CHELMSFORD AVENUE
MIDDLE HAPECLIFF ROAD
WALDEGRAVE STREET
GRANVILLE ROAD
TRAFALGAR AVENUE

APPENDIX 5 - MIDDLE HARBOUR ROAD, LINDFIELD HCA REVIEW – REVISION - JUNE 2016

HCA REVIEW CONTRIBUTION MAP

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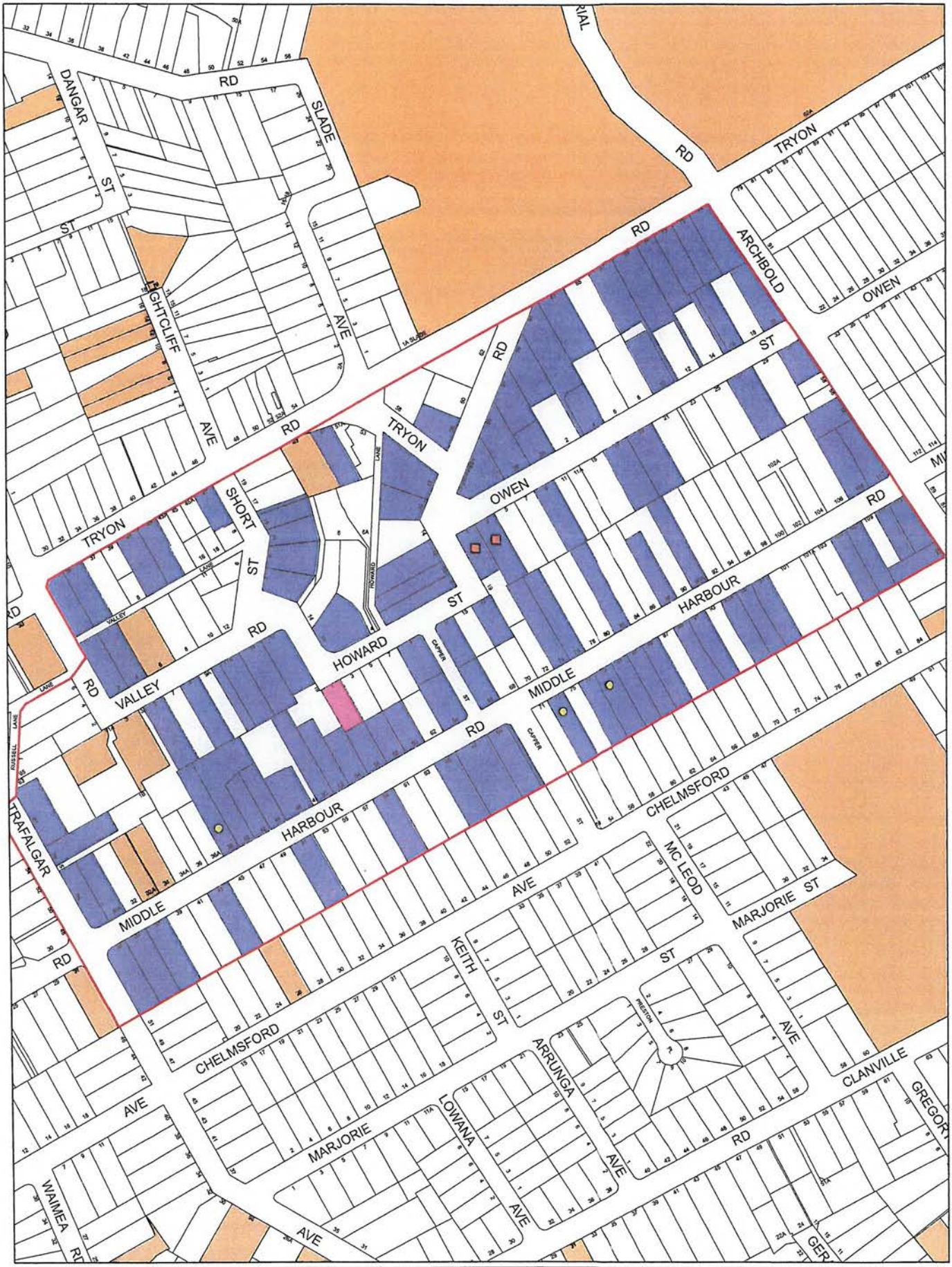


Study Area

Heritage Items

Borderline Contributing

- Carports at front
- Bricked in verandah

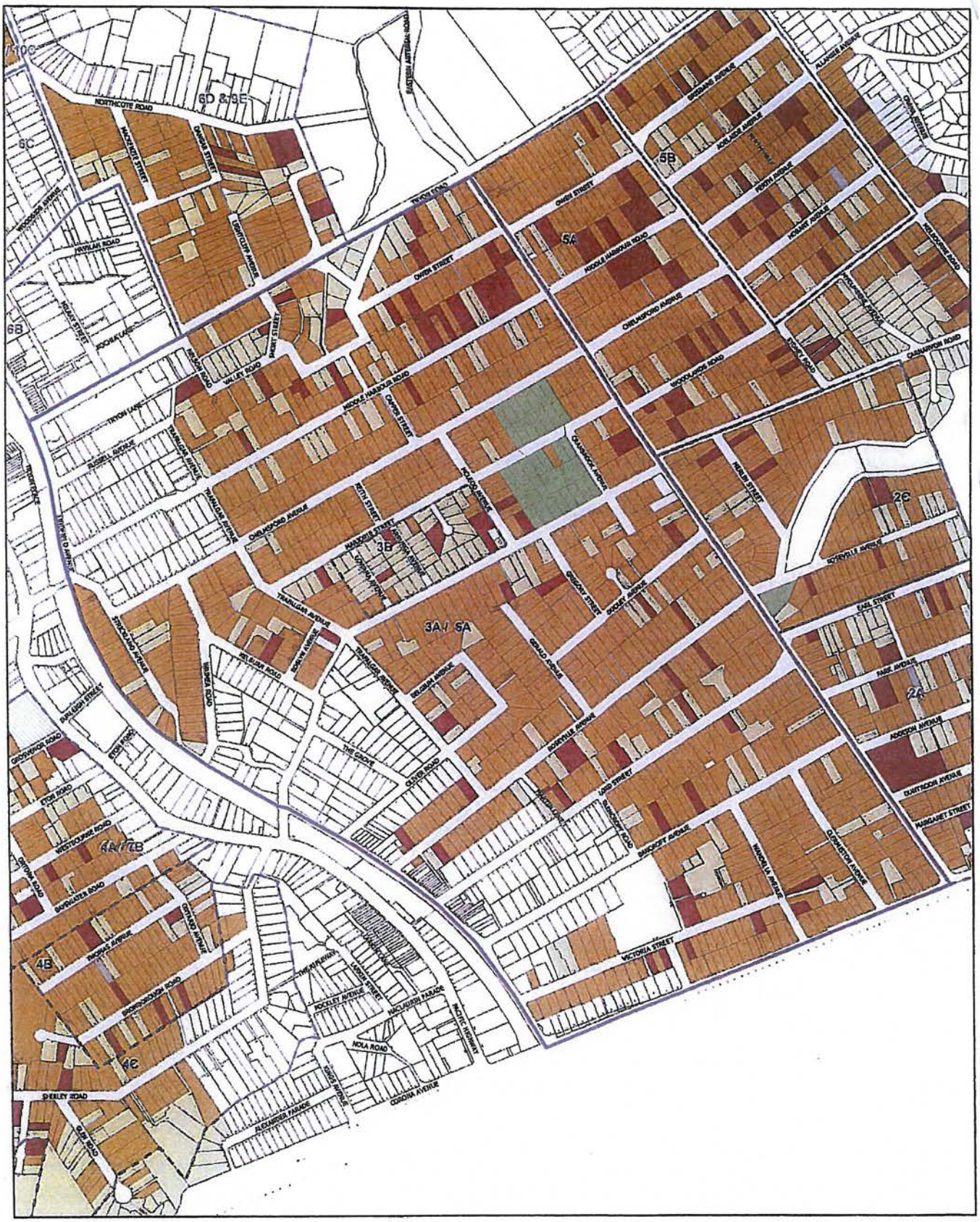
Heritage Rating

- Contributing
- Neutral
- Detracting

Middle Harbour Road, Lindfield HCA Review - Revision - June 2016

Date: 17/06/2016

APPENDIX 6 – MIDDLE HARBOUR ROAD CONSERVATION AREA CONTRIBUTION MAP – ARCHITECTURAL PROJECTS 2010



Legend

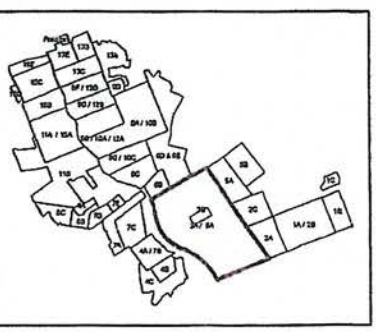
- PROPOSED HCA BOUNDARY
- CONTRIBUTORY
- NEUTRAL
- UNCHARACTERISTIC
- BUILDING SITE/VACANT
- RESERVE/OPEN SPACE
- SCHOOL

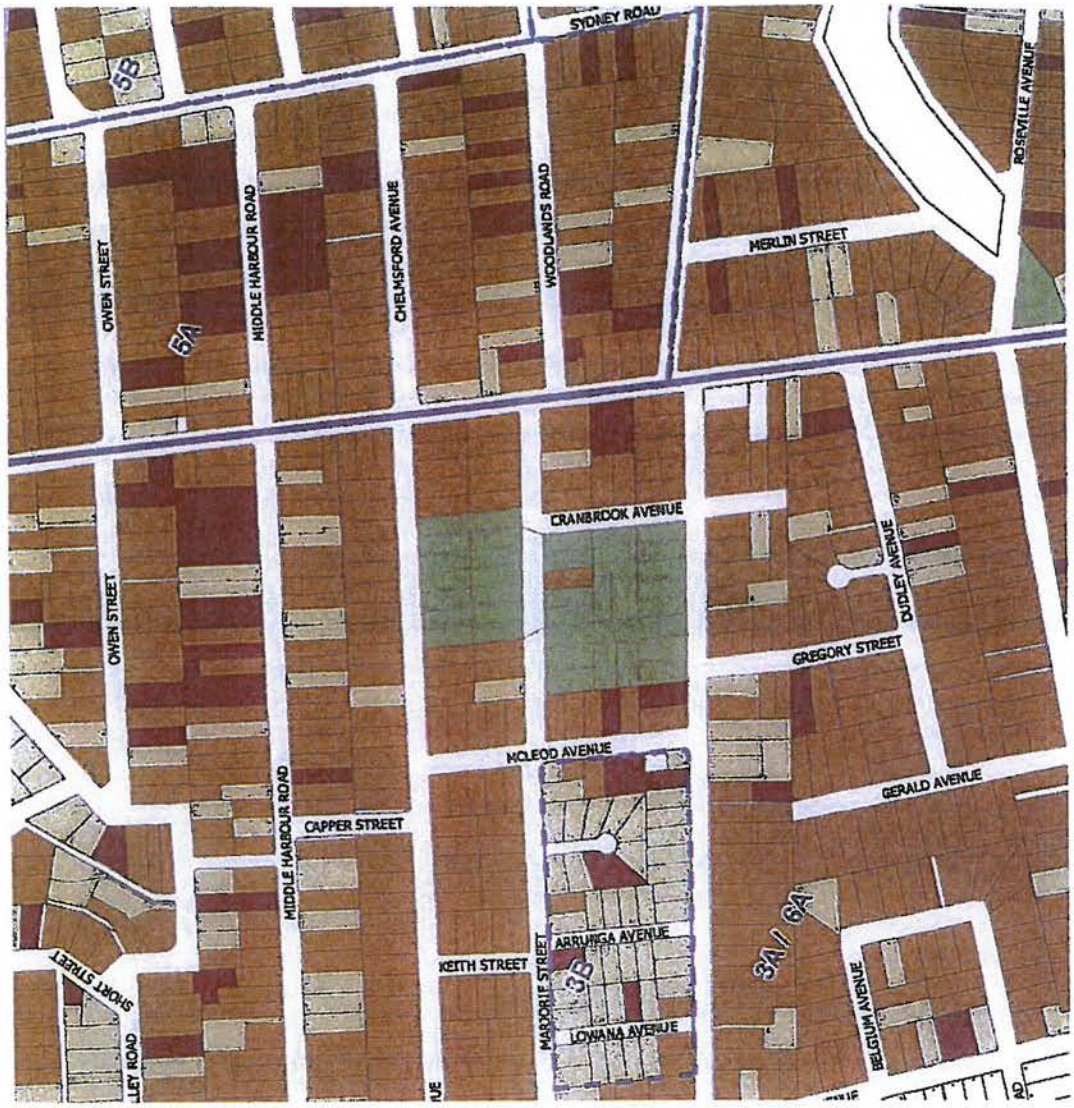
0 3060 120 180 240 Metres

N

Study Area Number 3A / 6A

Jan 13, 2011





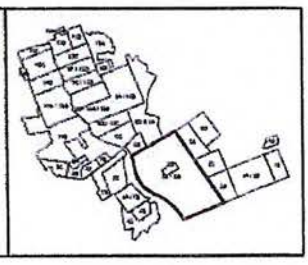
Legend

- PROPOSED HCA BOUNDARY
- CONTRIBUTORY
- NEUTRAL
- UNCHARACTERISTIC
- BUILDING SITE/VACANT
- RESERVE/OPEN SPACE
- SCHOOL

0 30 60 120 180 240 Metres

Study Area
Number 3A / 6A

Jan 13 2011



APPENDIX 7 – MIDDLE HARBOUR ROAD CONSERVATION AREA CONTRIBUTION MAP – ARCHITECTURAL PROJECTS 2015

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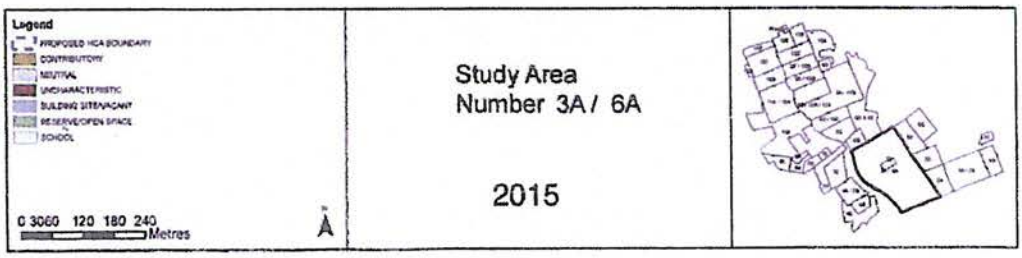
OWEN STREET
MIDDLE HARBOUR ROAD
CHELMSFORD AVENUE
WOODLANDS RO
MERLIN STREET
6A
CRANBROOK AVENUE
DUDLEY AVENUE
GREGORY STREET
HOLEOD AVENUE
GERALD AVENUE
CAPPER STREET
KEITH STREET
ARRUNGA AVENUE
3B
3A / 6A
LOWANA AVENUE
BELGIUM AVENUE
SHORT STREET
VALLEY ROAD
NELSON ROAD
TRAFALGAR AVENUE
OLIVER ROAD
THE GROVE
ROSEVILLE AVENUE
KELBURN ROAD


Legend
PROPOSED HCA BOUNDARY
CONTRIBUTORY
NEUTRAL
UNCHARACTERISTIC
BUILDING SITE/VACANT
RESERVE/OPEN SPACE
SCHOOL
0 3060 120 180 240
Metres
Study Area
Number 3A / 6A
2015

APPENDIX 8 – PHOTOGRAPHS OF THE HOUSES IN THE PROPOSED MIDDLE HARBOUR ROAD HERITAGE CONSERVATION AREA

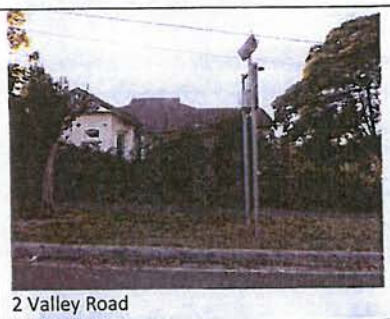
© Architectural Projects Pty Limited

55 Trafalgar Avenue

59 Trafalgar Avenue

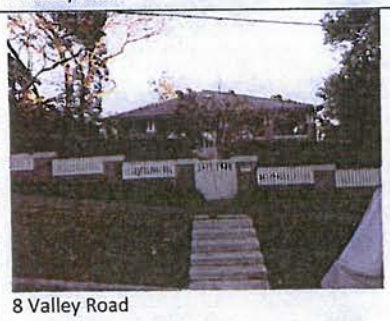
61 Trafalgar Avenue

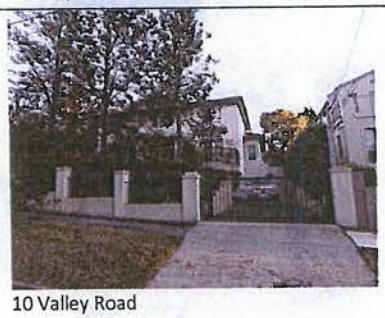
65 Trafalgar Avenue

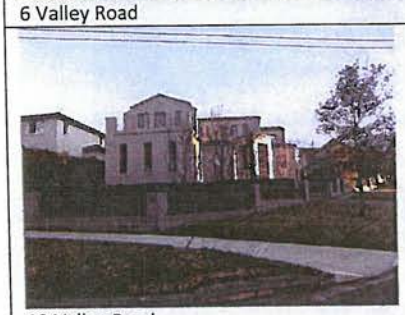

2 Valley Road

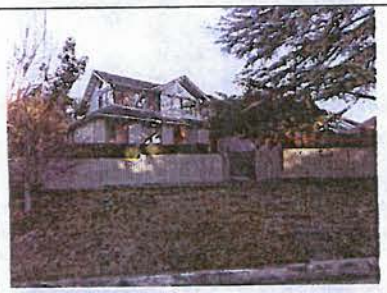
4 Valley Road

6 Valley Road


8 Valley Road


10 Valley Road


12 Valley Road


6 Short Street

8 Short Street

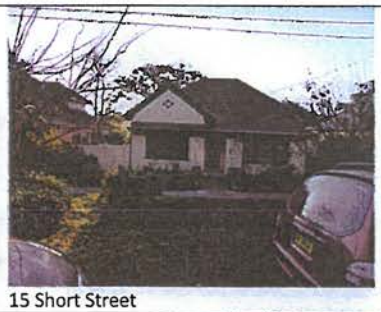
18 Valley Lane

16 Valley Lane

11 Valley Lane

19 Short Street

17 Short Street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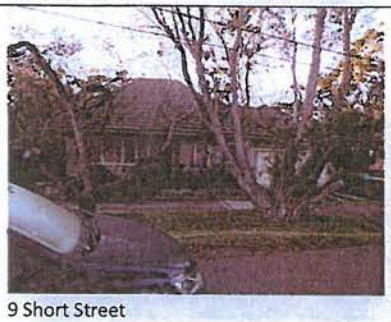
11 Short Street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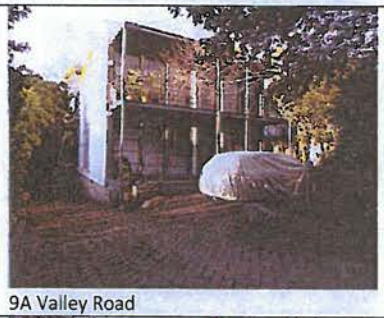
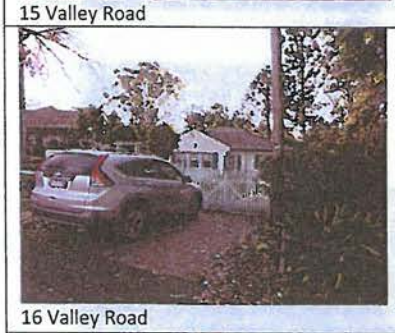
7 Short Street

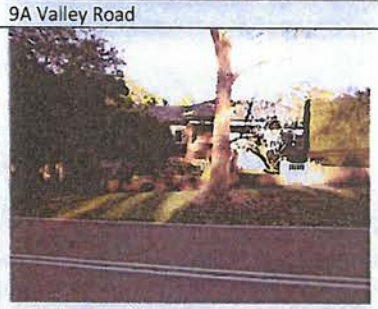
15 Valley Road

11 Valley Road


9A Valley Road


16 Valley Road

14 Valley Road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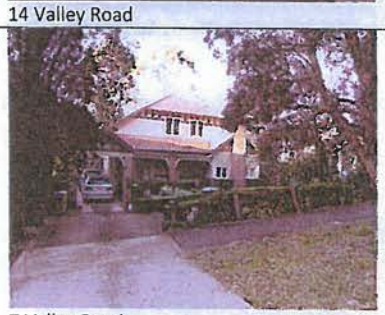
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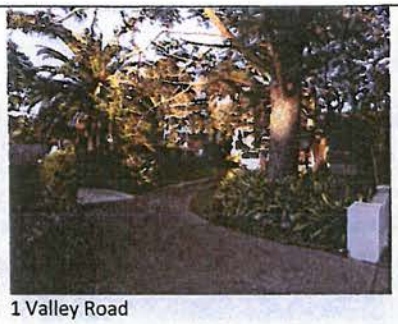
5 Valley Road

3
Valley Road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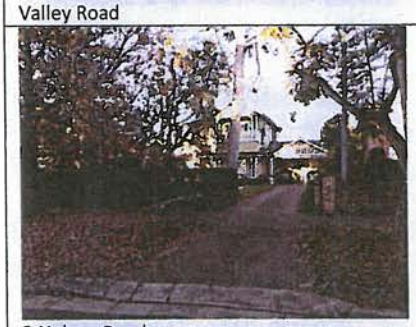
19 Valley Road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4 Nelson Road

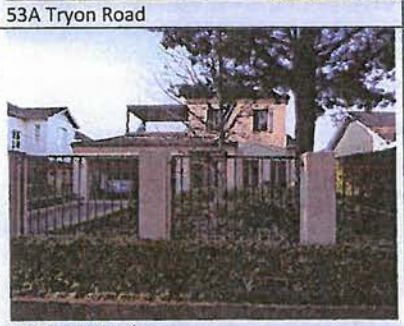
6 Nelson Road

57 Tryon Road

53A Tryon Road

35 Tryon Road

37 Tryon Road


39 Tryon Road

41 Tryon Road

43 Tryon Road

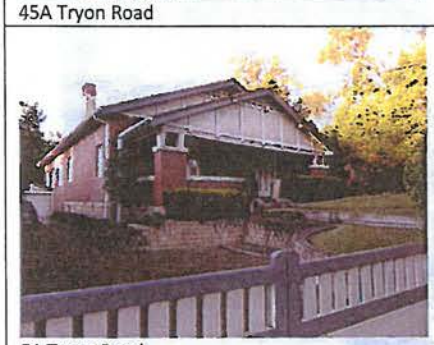
43A Tryon Road

45 Tryon Road

45A Tryon Road

47 Tryon Road

49 Tryon Road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53 Tryon Road

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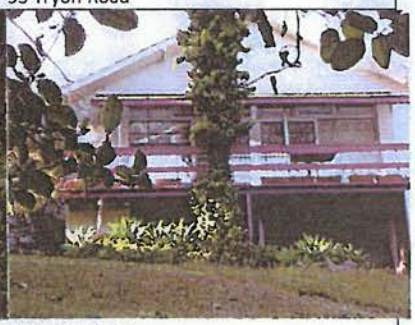
61 Tryon Road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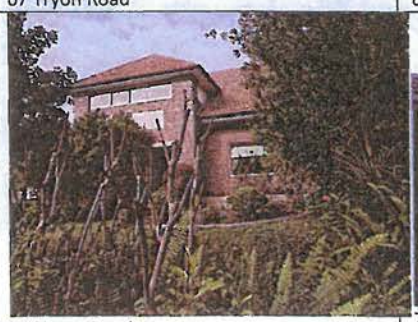
67 Tryon Road

69 Tryon Road

71 Tryon Road

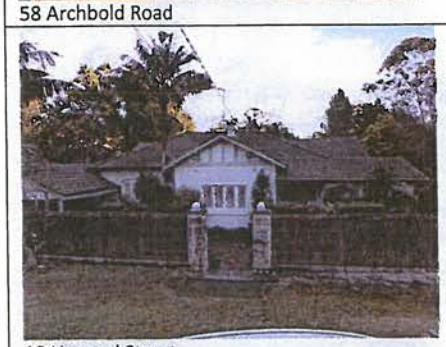

73 Tryon Road

75 Tryon Road

58 Archbold Road

56 Archbold Road

54 Archbold Road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14 Howard Street

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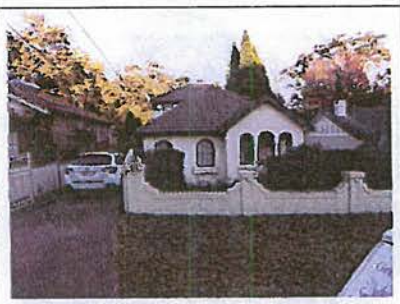
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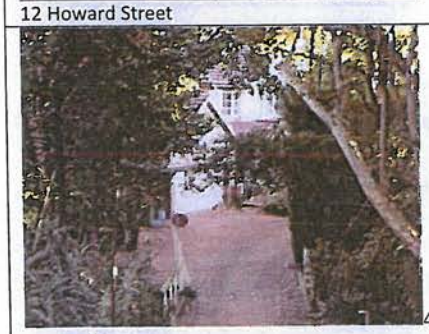
Howard Street

1 Howard Street

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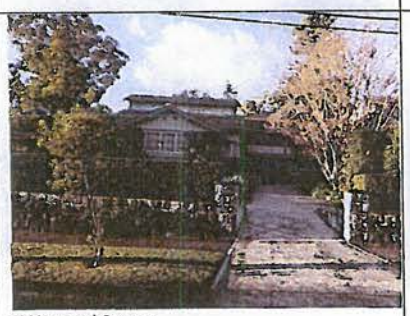
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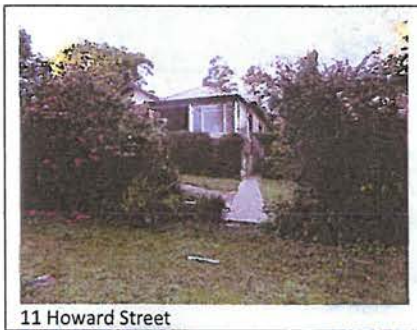
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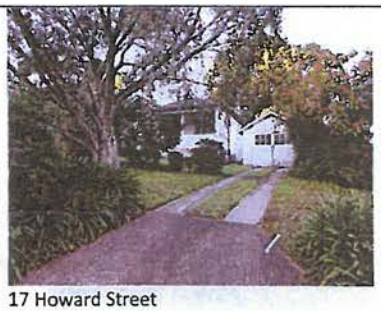
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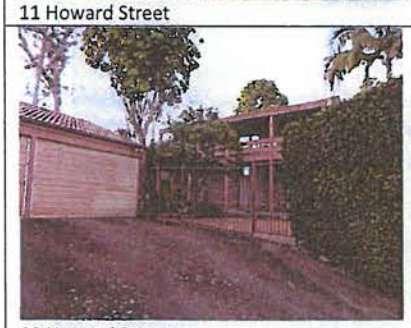
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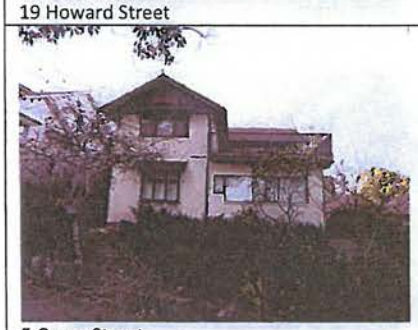
3 Owen Street


5 Owen Street

7 Owen Street

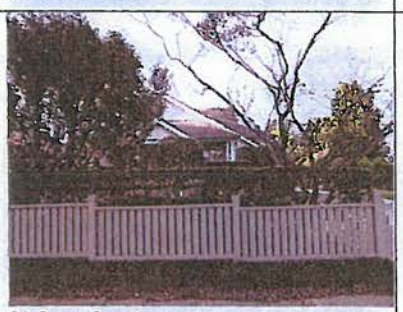
9 Owen Street

11 and 11A Owen Street

15 Owen Street

17 Owen Street

19 Owen Street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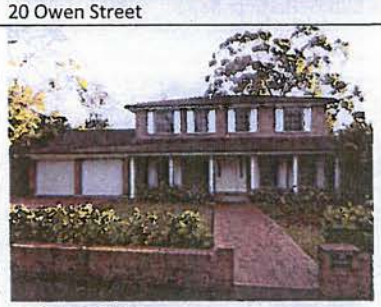
18 Owen Street

16 Owen Street


14 Owen Street

12 Owen Street

10 Owen Street

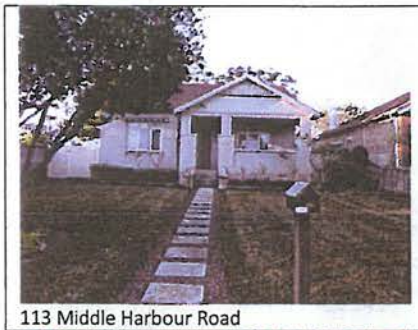
8 Owen Street

6 Owen Street

4 Owen Street

Owen Street

2A Owen Street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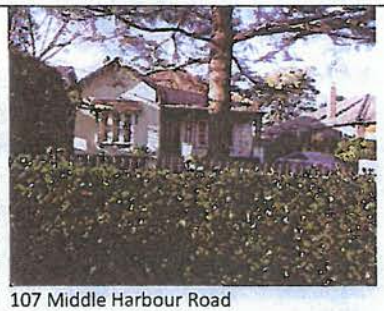
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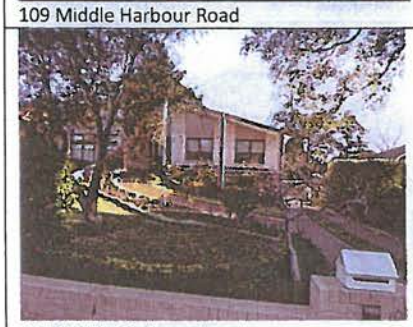
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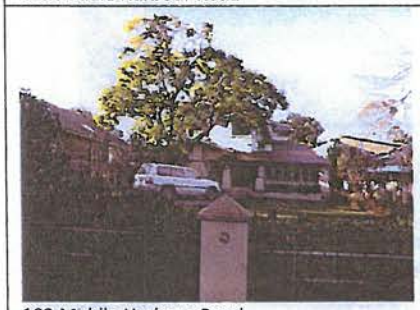
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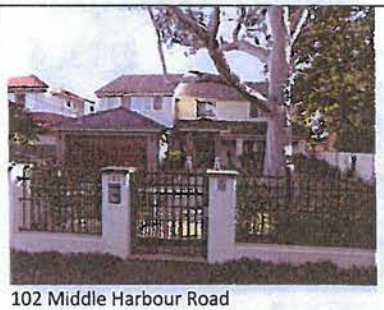
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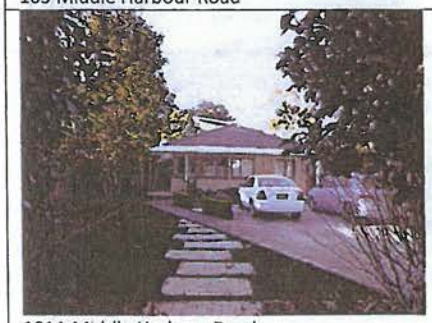
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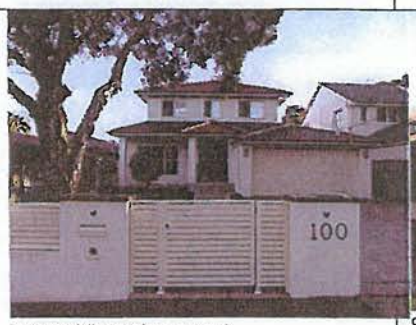

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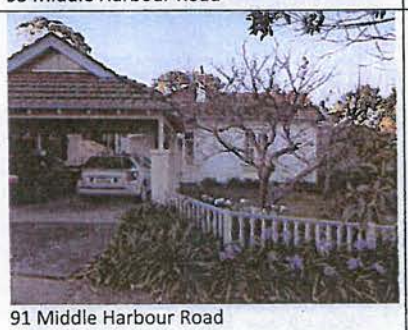
93 Middle Harbour Road

93A Middle Harbour Road

92 Middle Harbour Road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87 Middle Harbour Road

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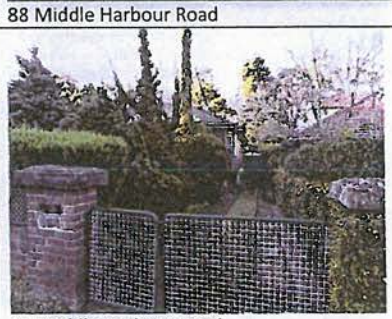
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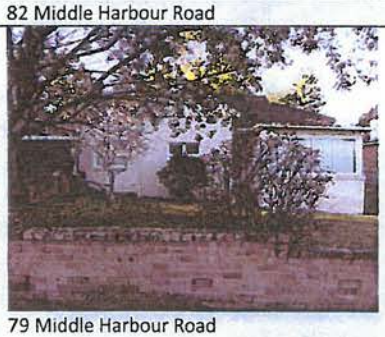
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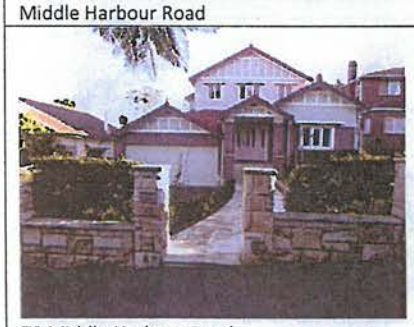
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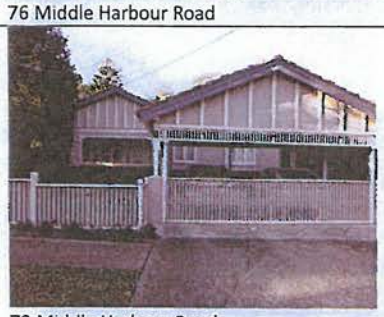
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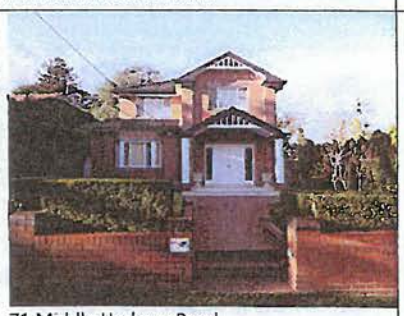
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68 Middle Harbour Road

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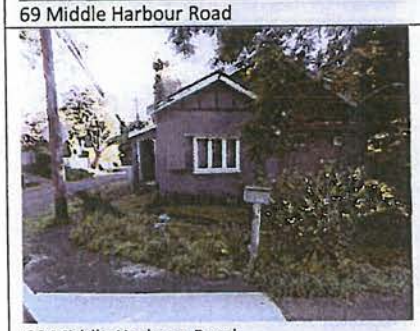
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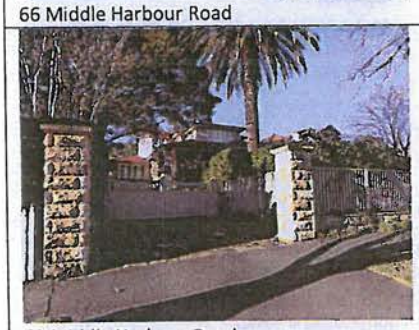
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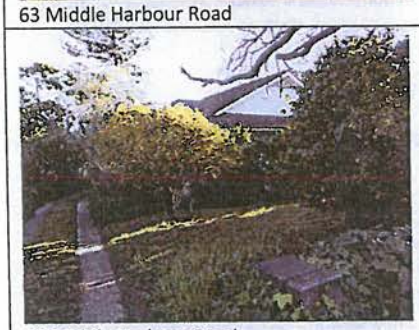
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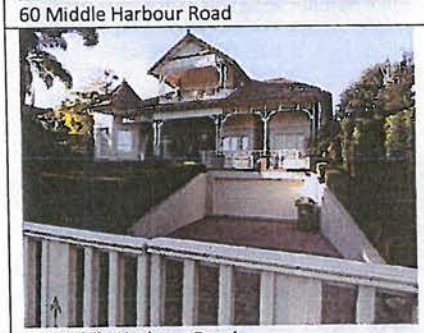
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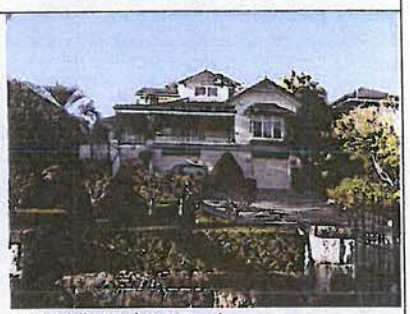
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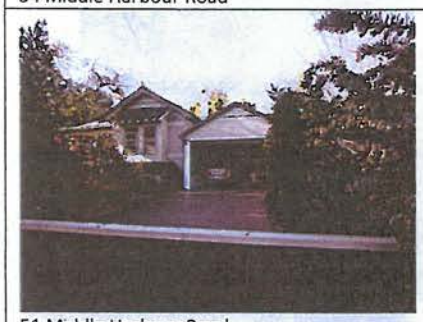
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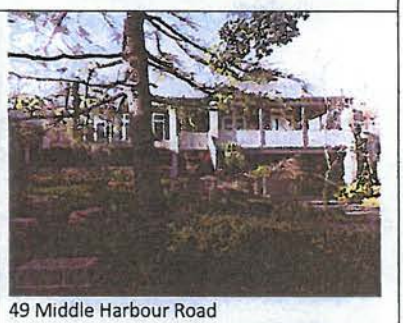
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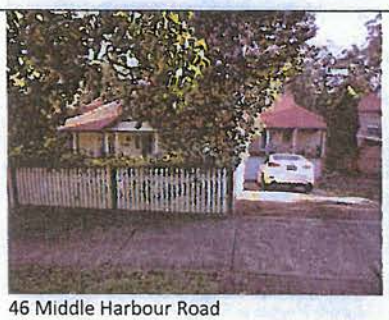
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30A Middle Harbour Road

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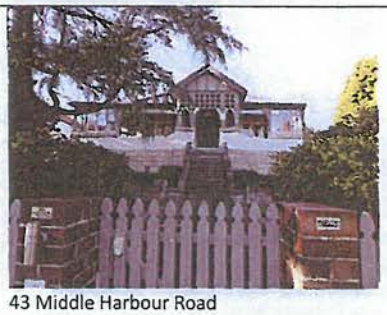
44 Middle Harbour Road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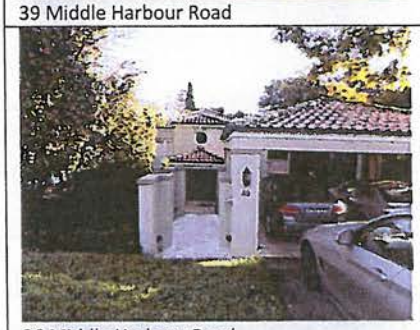
39 Middle Harbour Road

38 Middle Harbour Road

37 Middle Harbour Road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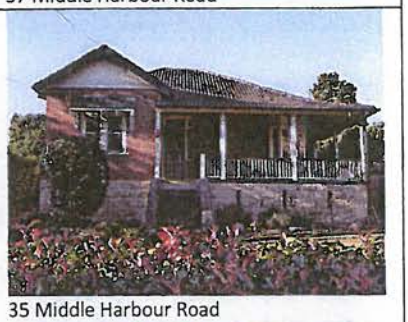
36A Middle Harbour Road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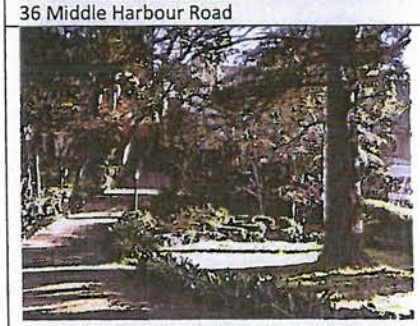
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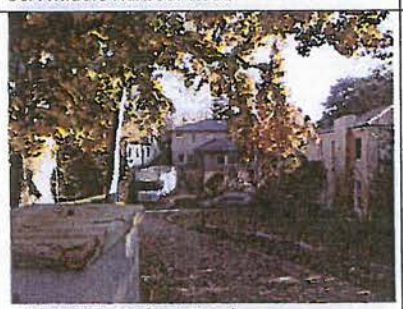
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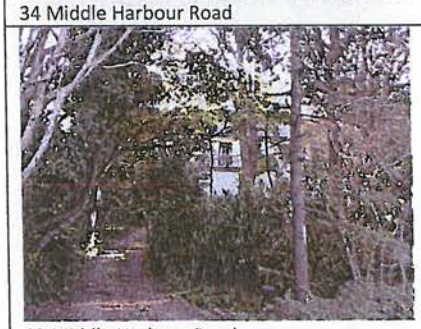
33 Middle Harbour Road


32 Middle Harbour Road

32A Middle Harbour Road

Photos taken on 29th June 2017. Photographs of the following properties have not been included due to access challenges:
57 Trafalgar Avenue; 63 Trafalgar Avenue; 1A & 1B Valley Road; 3A Valley Road; 48 Middle Harbour Road; 102A Middle Harbour; 52 Archbold Road; 77 Tryon Road; 6 & 6A Howard Street; 56 Tryon Road; 58 Tryon Road; 60 Tryon Road; 62 Tryon Road; 8 Valley Lane

APPENDIX 9 – LIST OF DETRACTING PROPERTIES

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Proposed Middle Harbour Road Heritage Conservation Area – Photos of Detracting Properties

12 Valley Road

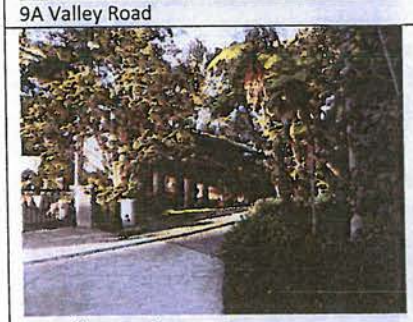
6 Short Street

10 Valley Road

9A Valley Road

17 Short Street

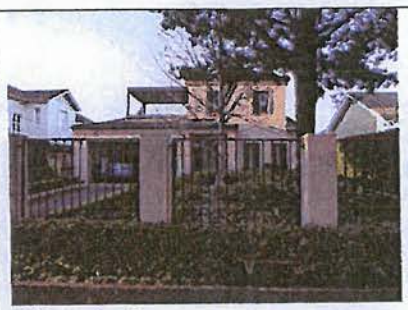
11 Valley Lane


19 Valley Road

4 Nelson Road

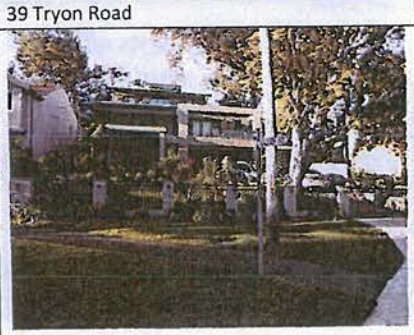
6 Nelson Road

43A Tryon Road


39 Tryon Road

53 Tryon Road

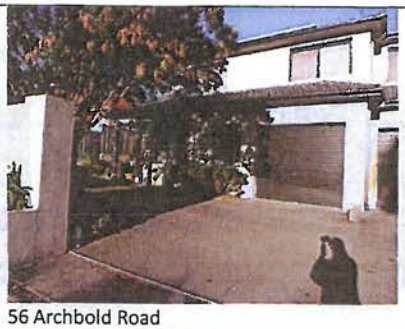
65 Tryon Road


1 Howard Street

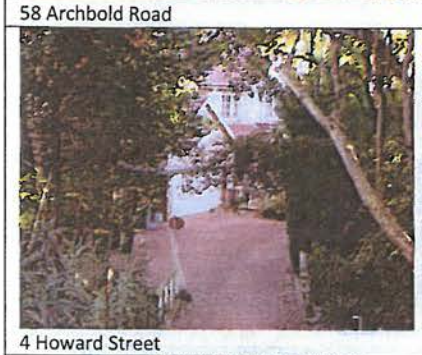
63 Tryon Road

Proposed Middle Harbour Road Heritage Conservation Area – Photos of Detracting Properties

58 Archbold Road

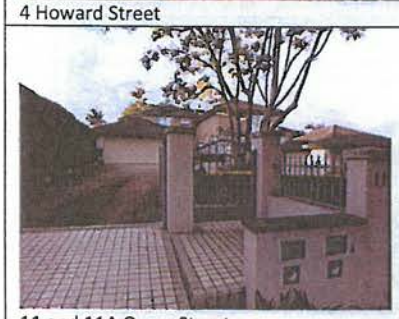

56 Archbold Road

14 Howard Street


4 Howard Street

7 Howard Street

19 Howard Street


11 and 11A Owen Street

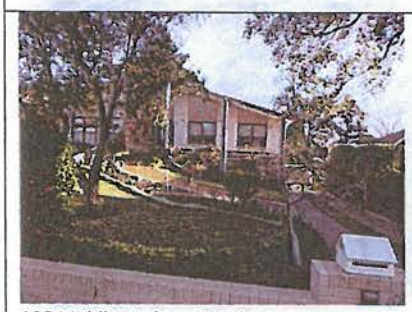
7 Owen Street

29 Owen Street

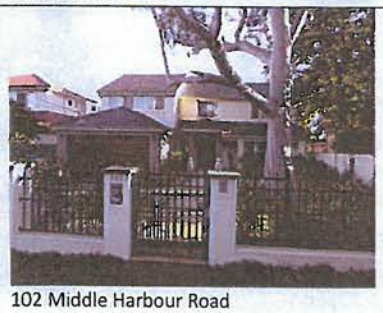
6 Owen Street

14 Owen Street

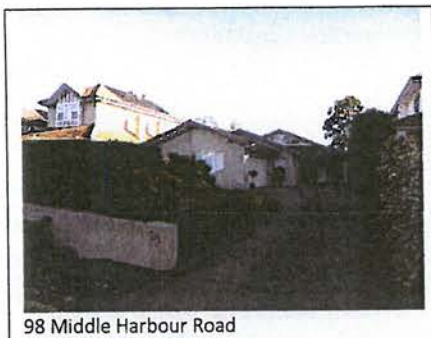
2 Owen Street


106 Middle Harbour Road

104 Middle Harbour Road


102 Middle Harbour Road

Proposed Middle Harbour Road Heritage Conservation Area – Photos of Detracting Properties


98 Middle Harbour Road

100 Middle Harbour Road

101A Middle Harbour Road

94 Middle Harbour Road

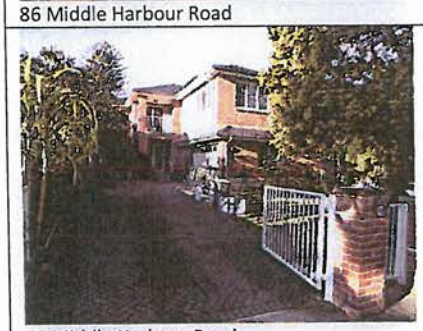
93 Middle Harbour Road

90 Middle Harbour Road

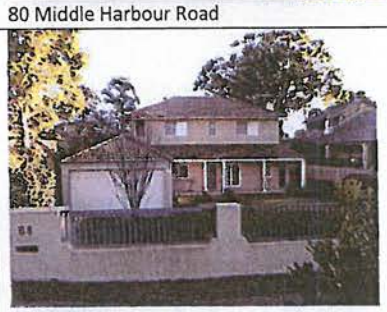
86 Middle Harbour Road

84 Middle Harbour Road

80 Middle Harbour Road


75 Middle Harbour Road

71 Middle Harbour Road


68 Middle Harbour Road

Middle Harbour Road

62 Middle Harbour Road (D)

36 Middle Harbour Road

65 Trafalgar Avenue

APPENDIX 10 – 2017 AP REVIEW OF ADDITIONAL PROPERTIES

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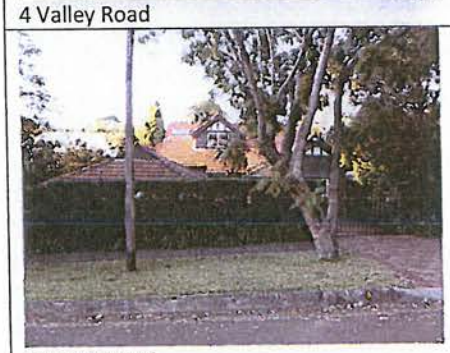
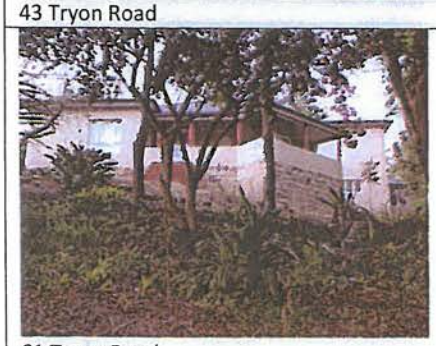
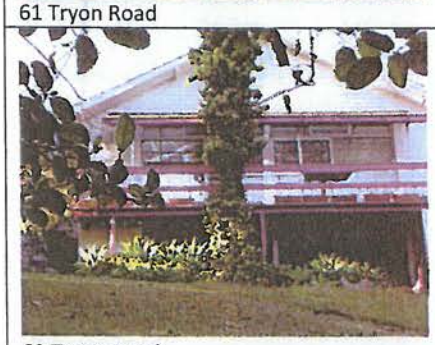
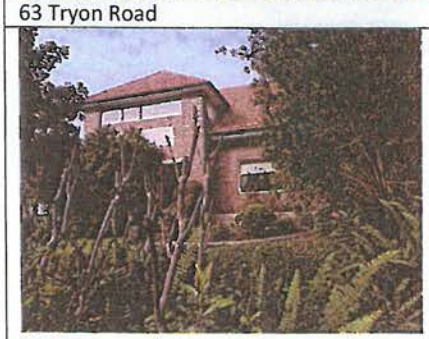
Appendix 10 - 2017 Architectural Projects Review of 19 Buildings classified as 'Contributory' by PMA 2015 Review and Ku-ring-gai Council Review

Address	PMA 2015 and subsequent Ku-ring-gai Council Classification	2017 Architectural Projects Review, Justification and Rating
 55 Trafalgar Avenue	Contributory	Neutral • 2nd storey extension dominant from street with double garage. • Extension flush with building line.
 59 Trafalgar Avenue	Contributory	Neutral • Roofline changed from original. • New added turret on left above verandah • New gable added to right side of verandah • No L-shape verandah • 2nd storey addition with pop-up gable • Addition of double garage
 4 Valley Road	Contributory	Neutral • 2 large dormer windows facing street with prominent gables
 9 Valley Road	Contributory	Neutral • Second storey addition with Large Dormer window and prominent gable on dormer • Double carport 100% forward of building line. • Large metal gates and brick fence

Appendix 10 - 2017 Architectural Projects Review of 19 Buildings classified as 'Contributory' by PMA 2015 Review and Ku-ring-gai Council Review

 9 Short Street	Contributory	Neutral • External house is completely rendered • Large prominent Double garage at building line. • Proportion of original house shift to horizontal changing typology.
 43 Tryon Road	Contributory	Neutral • Flat roofline extension towards street • New additional fill-in on right side of house • Painted brick
 61 Tryon Road	Contributory	Neutral • Bricks have been rendered • Not original windows • Roofline has changed, • No original gable
 63 Tryon Road	Contributory	Neutral / Detracting • House has been extended towards the street • Large front gable, not original • Full windows and sliding door running width of house • Painted brick • New railing
 73 Tryon Road	Contributory	Neutral • Inter-war • Large additional window at front right • Highlight windows added to 2nd storey above window

Appendix 10 - 2017 Architectural Projects Review of 19 Buildings classified as 'Contributory' by PMA 2015 Review and Ku-ring-gai Council Review

 2A Owen Street	Contributory	Neutral • Inter- war. • Dominant double garage plus second storey addition to right of house built one foot behind building line. • Changes proportion of the house.
 9 Owen Street	Contributory	Neutral • Dominant double garage 2m forward of building line • Extended verandah above double garage • Proportion of original house shift to horizontal
 91 Middle Harbour Road	Contributory	Neutral • Large dominant carport 100% forward of the building line • Rendered brick • Conceals original house
 89 Middle Harbour Road	Contributory	Neutral • New Garage under house • Change proportion • Rendered brick
 73 Middle Harbour Road	Contributory (Borderline)	Neutral • Painted Brick • Dominant double carport 100% forward of building line. • Original building concealed

Appendix 10 - 2017 Architectural Projects Review of 19 Buildings classified as 'Contributory' by PMA 2015 Review and Ku-ring-gai Council Review

 67 Middle Harbour Road	Contributory	Neutral • Painted brick • Dominant and visible 2nd storey addition to a single level federation • Chang proportions
 52 Middle Harbour Road	Contributory	Neutral • Carport structure 100% forward of building line • Painted brick • Has planning approval for demolition since 2014
 46 Middle Harbour Road	Contributory	Neutral • Painted brick • Verandah extended around house • Railing not original • Added triple garage, highly visible despite setback from the forward building line
 38 Middle Harbour Road	Contributory	Neutral • Attached carport to roofline and building • 100% forward of building line • Amended Verandah • Amended gable support • Carport Dominant structure • Original building concealed

APPENDIX 11 – COMPARISON OF REVIEWS MIDDLE HARBOUR ROAD

Appendix 11 - Middle Harbour Road HCA Reviews

NUMBER	AP SURVEY 2017	AP SURVEY 2015	AP SURVEY 2010	KU-RING-GAI COUNCIL SURVEY 2016	PMA SURVEY 2015
30 A	Contributing	Contributing	Contributing	Contributing	Contributing
32	Neutral	Neutral	Contributing	Neutral	Contributing
32 A	Contributing	Contributing	Contributing	Contributing	Contributing
34	Contributing	Contributing	Contributing	Contributing	Contributing
34 A	Neutral	Neutral	Contributing	Neutral	Contributing
36	Detracting	Detracting	Detracting	Neutral	Neutral
36 A	Neutral	Neutral	Neutral	Neutral	Contributing
38	Neutral	Neutral	Contributing	Contributing	Contributing
40	Contributing	Contributing	Contributing	Contributing	Contributing
42	Contributing	Contributing	Contributing	Contributing	Contributing
44	Contributing	Contributing	Contributing	Contributing	Contributing
46	Neutral	Neutral	Contributing	Contributing	Contributing
48	Battle Axe	Battle Axe	Battle Axe	Battle Axe	Battle Axe
50	Contributing	Contributing	Contributing	Contributing	Contributing
52	Neutral	Neutral	Neutral	Contributing	Contributing
54	Contributing	Contributing	Contributing	Contributing	Contributing
56	Contributing	Contributing	Contributing	Contributing	Contributing
58	Contributing	Contributing	Contributing	Contributing	Contributing
60	Contributing	Contributing	Contributing	Contributing	Contributing
62	Detracting	Detracting	Detracting	Neutral	Contributing
64	Contributing	Contributing	Contributing	Contributing	Contributing
66	Contributing	Contributing	Contributing	Contributing	Contributing
68	Detracting	Detracting	Neutral	Neutral	Neutral
70	Neutral	Neutral	Contributing	Neutral	Contributing

NUMBER	AP SURVEY 2017	AP SURVEY 2015	AP SURVEY 2010	KU-RING-GAI COUNCIL SURVEY 2016	PMA SURVEY 2015
72	Detracting / Contributing	Detracting / Contributing	Neutral	Neutral	Contributing
74	Contributing	Contributing	Contributing	Contributing	Contributing
76	Contributing	Contributing	Contributing	Contributing	Contributing
78	Detracting	Detracting	Contributing	Neutral	Contributing
80	Detracting	Detracting	Neutral	Neutral	Neutral
82	Contributing	Contributing	Contributing	Contributing	Contributing
84	Detracting	Detracting	Detracting	Neutral	Neutral
86	Detracting	Detracting	Detracting	Neutral	Neutral
88	Contributing	Contributing	Contributing	Contributing	Contributing
90	Detracting	Detracting	Detracting	Neutral	Neutral
90 A	Contributing	Contributing	Contributing	Contributing	Contributing
92	Detracting	Detracting	Detracting	Neutral	Contributing
94	Detracting	Detracting	Detracting	Neutral	Neutral
96	Detracting	Detracting	Neutral	Neutral	Contributing
98	Neutral	Neutral	Neutral	Neutral	Neutral
100	Detracting	Detracting	Detracting	Neutral	Neutral
102	Detracting	Detracting	Detracting	Neutral	Neutral
102 A	Battle Axe	Battle Axe	Battle Axe	Battle Axe	Battle Axe
104	Detracting	Detracting	Detracting	Neutral	Neutral
106	Detracting	Detracting	Detracting	Neutral	Contributing
108	Contributing	Contributing	Contributing	Contributing	Contributing
110	Contributing	Contributing	Contributing	Contributing	Contributing

NUMBER	AP SURVEY 2017	AP SURVEY 2015	AP SURVEY 2010	KU-RING-GAI COUNCIL SURVEY 2016	PMA SURVEY 2015
113	Contributing	Contributing	Contributing	Contributing	Contributing
111	Contributing	Contributing	Contributing	Contributing	Contributing
109	Neutral	Neutral	Neutral	Neutral	Contributing
107	Contributing	Contributing	Contributing	Contributing	Contributing
105	Contributing	Contributing	Contributing	Contributing	Contributing
103	Neutral	Neutral	Neutral	Neutral	Contributing
101 A	Neutral	Neutral	Neutral	Neutral	Neutral
101	Neutral	Neutral	Neutral	Neutral	Contributing
97	Contributing	Contributing	Contributing	Contributing	Contributing
95	Contributing	Contributing	Contributing	Contributing	Contributing
93 A	Contributing	Contributing	Contributing	Contributing	Contributing
93	Neutral	Neutral	Neutral	Neutral	Neutral
91	Neutral	Neutral	Contributing	Contributing	Contributing
89	Neutral	Neutral	Contributing	Contributing	Omitted
87	Neutral	Neutral	Neutral	Neutral	Contributing
85	Contributing	Contributing	Contributing	Contributing	Contributing
83	Contributing	Contributing	Contributing	Contributing	Contributing
81	Contributing	Contributing	Contributing	Contributing	Contributing
79	Contributing	Contributing	Contributing	Contributing	Contributing
77	Contributing	Contributing	Contributing	Contributing	Contributing
75	Detracting	Detracting	Detracting	Neutral	Omitted
73	Neutral	Neutral	Contributing	Contributing	Contributing
71	Detracting	Detracting	Contributing	Neutral	Neutral
69	Contributing	Contributing	Contributing	Contributing	Contributing
67	Neutral	Neutral	Neutral	Contributing	Contributing
65	Contributing	Contributing	Contributing	Contributing	Contributing

NUMBER	AP SURVEY 2017	AP SURVEY 2015	AP SURVEY 2010	KU-RING-GAI COUNCIL SURVEY 2016	PMA SURVEY 2015
63	Neutral	Neutral	Neutral	Neutral	Neutral
61	Neutral	Neutral	Contributing	Neutral	Contributing
59	Contributing	Contributing	Contributing	Contributing	Contributing
57	Detracting	Detracting	Neutral	Neutral	Neutral
55	Neutral	Neutral	Neutral	Neutral	Contributing
53	Neutral	Neutral	Neutral	Neutral	Neutral
51	Contributing	Contributing	Contributing	Contributing	Contributing
49	Neutral	Neutral	Contributing	Neutral	Neutral
47	Contributing	Contributing	Contributing	Neutral	Contributing
45	Neutral	Neutral	Neutral	Neutral	Contributing
43	Contributing	Contributing	Contributing	Contributing	Contributing
41	Detracting	Detracting	Neutral	Neutral	Contributing
39	Neutral	Neutral	Contributing	Neutral	Neutral
37	Contributing	Contributing	Contributing	Contributing	Contributing
35	Contributing	Contributing	Contributing	Contributing	Contributing
33	Contributing	Contributing	Contributing	Contributing	Contributing

Total Houses	**88**	**88**	**88**	**88**	**88**
Total Contributing	41	41	53	47	65
Total Neutral	25	25	21	39	19
Total Detracting	19	19	12	0	0
Battleaxe / Other	3	3	2	2	4
% Contributing	**46.5%**	**46.5%**	**60.2%**	**53.4%**	**73.8%**