



NATIONAL TRUST

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PATRON: The Hon Margaret Reid AO

26 March 2019

Environment, Planning and Sustainable Development
Directorate – Planning
Gateway Team
16 Challis St
DICKSON ACT

Attention: epdcustomerservices@act.gov.au.

DA2017 33114

The National Trust is concerned with some aspects of the proposal in relation to the heritage listed block and site. These are detailed below:

- The new basement will excavate land below the area of influence of the heritage buildings footings with no comment in the submission.
- The block is isolated and the scale of the new development will make it look awkward and a poor design outcome.
- The change of use is unfortunate when residential would retain more significance. There is no lift or toilets which will reduce space per floor and viability.
- There is no recognition of the overall design of the original flats in the proposal and the block remains alienated from any original context.

Analysis against criteria

- a The change of use means its function and interpretation are lost and has an impact.
- b & d The statement that doors and windows are replaced with *“upgraded doors and windows to meet compliance requirements”* makes no mention if they will be the same design, layout, materials all of which changes the representative nature of the building and has an impact. The reinstatement of landscape (?) does little to overcome the other adverse impacts.
- f The planning layout of the original design is destroyed with the new design so it does have an impact.
- h The changes proposed means it is no longer a representative example of Sid Anchor’s work so it does have an impact.

Despite the *“favourable assessment”* of the impact against the criteria, Section 42 details *“mitigation strategies to offset the loss of heritage significance”*. The loss of significance is acknowledged and agreed but a recording is little comfort in conserving heritage values.

There is reference is to an interpretation strategy with no details about it.

The impact on the upgrade of the external envelope states *“all external original building features would be retained”* yet all original windows and doors get replaced as stated in the para below and

the interior is gutted with no details remaining. Once again drawings and photographs are no substitute for design integrity.

We do not agree with the conclusion of the statement of Heritage effects. The proposal does have a major impact.

The end result is the retention and adaptive reuse of one heritage block which has no context of its original design or integrity and all elements of the original design are removed except the masonry shell as such is not a good outcome.

We also have concerns about the metal screens and their likelihood to maintain a quality finish over time and traffic issues, although these are not heritage related.

Yours faithfully

A handwritten signature in black ink, appearing to read 'E. Martin', written in a cursive style.

Eric Martin, AM