



Charles Henlev Architect

709-325-7555

[charles@charleshenlev.com](mailto:charles@charleshenlev.com)

2026-03-23

Mayor Danny Breen  
PO Box 908, St. John's, NL, Canada A1C 5M2

RE: Addition of a Bay Window in Rear Mansard Roof of Devon House,  
Renovations to 59 Duckworth Street, St. John's

Dear Mayor Breen,

On behalf of the Owner of the project, [REDACTED], I am writing directly to you and the rest of Council to make you aware of a serious bureaucratic road block we have come up against on the above noted project. I will explain as briefly as I can and seek yours and Council's intercession in the matter.

59 Duckworth Street, known as Devon House, previously for many years known as the NL Craft Council office and gallery, was built around 1880. It was a designated building by Heritage NL for many years and more recently by the City of St. John's as a designated heritage structure since 2006.



*Devon House, Duckworth Street*



Charles Henley Architect

709-325-7555

[charles@charleshenley.com](mailto:charles@charleshenley.com)

The project is the conversion of the building into an 8-unit apartment building with decks at the rear enabling: access to private exterior space, views of the harbour and narrows, and natural southern light. Historic preservation, reconstruction, sustainability and adherence to NBCC and other codes and standards is the design and construction mandate. We have been granted permits and the project is under construction.

We have a very good working relationship with all City staff thus far on the project and are not expecting any issues in the future, with exception of the current roadblock we are currently experiencing with the heritage bureaucracy. The only outstanding issue is disallowing the removal of a rear third-floor dormer window and replacing it with a bay window matching the two floors below. Due to sub standard 1980's renovations prior to 2006 City Heritage designation, it is impractical and dimensionally impossible to install a proper door access to the approved Level 3 deck through the existing round topped dormer window. In addition, this is the living room of a unit and it needs access to appropriate natural light and southern exposure and views.

After we made a recent presentation to the Built Heritage Experts Panel, in a recent email correspondence of Lindsay Church, 13 March, 2026 she wrote:

“Considering that this is a designated Heritage Building and there are limited number of designated Heritage Buildings in the city, the Built Heritage Experts Panel voted to maintain the Heritage Design Standards as is and will recommend to Council to not amend the Heritage By-Law, Schedule D Heritage Design Standards.”

We are proposing to remove only one of the four rear dormers and extend the bay window up to Level 3. The remaining three dormers will be retained or reconstructed to meet heritage standards. This is a very minor change at the rear of the building, almost completely out of public view and will be obscured by the approved three levels of balconies. As an aside, after selected demolition of interiors, we discovered that the whole of this rear mansard roofing system is rotten and in need of full replacement. A large and unexpected additional cost to the project and the owner's budget.

Early in the design process we contacted Dale Jarvis, Executive Director of Heritage NL, explained the proposed design and asked for their viewpoint and comment as we knew this was a Provincially Designated Heritage Building. He said, while they would like to restore all parts of the building it is understood that the dominant publicly viewed parts were of most importance.

We have also reviewed our proposal with Shane O'Dea, historical buildings expert and longtime heritage advocate and Heritage NL board member. Shane has reviewed our proposal and has noted that in his fifty years of dealing with heritage development in the city, he has not seen the City recommend the protection of the rear elevation of a building. In this case, he says, the proponents have developed a very sympathetic modification of the upper story window: removing the existing but damaged dormer and replacing it with a bay duplicating those below. This is not a modern replacement but a design in keeping with the building,



Charles Henley Architect

709-325-7555

[charles@charleshenley.com](mailto:charles@charleshenley.com)

replicating as it does the bay windows on the storeys below and it should be approved and permitted. Shane has said he is prepared to discuss this with Council or its Committees.

Attached you will find the last presentation we made to the Built Heritage Experts Panel.

The Owner, [REDACTED], is not a typical developer but a modest person with a passion to preserve Devon House and its heritage at great extra cost to [REDACTED]. The practical and financial viability of the Level 3 apartment depends on adequate access through the rear to the sun and views.

We understand from city staff that their hands are tied based on their required adherence to the strict wording of the Heritage By-Law, Schedule D Heritage Design Standards. Perhaps that wording is fundamentally flawed. I am not sure but it seems to be inhibiting doing the right thing in this case. What we are proposing is a very reasonable request. We respectfully request Council to instruct city staff to allow us to remove one dormer and extend the dormer up to Level 3 and amend the Heritage By-Law, if necessary.

Regards,

Charles H Henley, NLAA CPHD

CC All of St. John's City Council

[REDACTED]  
Terry Maidment, ASCT, Construction Manager, Maidment Consulting Inc.

Dale Jarvis, Executive Director of Heritage NL

Shane O'Dea, CM, ONL, LLD (hc), DUniv (hc)