

17 May 2022

Mr Brett Newman  
Chief Executive Officer  
Parramatta City Council

By email: [council@cityofparramatta.nsw.gov.au](mailto:council@cityofparramatta.nsw.gov.au)

Dear Mr Newman,

**National Trust submission relating to the Parramatta City Council draft Planning Proposal, draft Development Control Plan (DCP) and draft Planning Agreement for 195 Church St, 65-79 Macquarie St, 38 and 45 Hunter St, Parramatta - St John's Anglican Church site (RZ/5/2018)**

The National Trust of Australia (NSW) expresses its strong objections to the draft Planning Proposal, draft Development Control Plan (DCP) and draft Planning Agreement for St John's Anglican Church site, Parramatta. Specifically, we oppose Option A (removal and replacement of the Church Hall) and we have strong concerns about the proposed planning changes that support Option B (partial retention of the Church Hall).

**Our Understanding of the Proposal**

We understand that the City of Parramatta Council is publicly exhibiting a draft site-specific Planning Proposal, draft site-specific DCP and draft Planning Agreement for land at 195 Church Street, 65-79 Macquarie Street, 38 and 45 Hunter Street, Parramatta (known as the St John's Anglican Church site) to enable redevelopment on the site for two buildings - a commercial tower and mixed-use building.

The draft site-specific DCP proposes guidelines on several matters, including heritage, public domain, built form, for two development options in relation to St John's Parish Church Hall (a local heritage item). Specifically:

- The controls for Option A relate to removal and replacement of the Church Hall, and
- The controls for Option B relate to partial retention of the original c1910 Church Hall structure.

The draft site-specific PP proposes controls to change the zoning of some of land, amend the permissible density controls on the site and identify a portion of land on the Land Reservation Acquisition Map together with some other amendments.

**Significance of St John's Church site and its setting**

St John's Anglican Cathedral occupies a prominent site in the heart of the City of Parramatta. It is the oldest Church site and continuous place of Christian worship in Australia dating from 1803. The significance of the cathedral, its associated elements and buildings, its setting and its landmark qualities cannot be downplayed.

St John's Provisional Cathedral, as part of the Parramatta Town Hall Group, was listed on the National Trust Register in April 1976. The group listing includes the Town Hall, St John's Pro-Cathedral, Horse Parapet Façade and the Centennial Memorial Clock.

The St John's Cathedral group listing noted its significance as:

*A group of civic structures that **together** form the nucleus of historic Parramatta reflecting Governor Macquarie's plan of 1822 with central church and market place. The towers of St John's date from this period and **still form an important landmark** whilst the other buildings and structures within the group lend great interest and **promote a lively human***



*scale around St John's Square, forming a cohesive civic space. Each in themselves is an important townscape element. The small St John's Park in the centre dates from Governor Macquarie's time and was Parramatta's first village green in the town proper.*

The St John's Cathedral listing noted its significance as:

*A most historic church whose twin towers form part of the oldest Anglican Church fabric in Australia. The towers are of beautiful and unique appearance being designed by the important early colonial architect John Watts. **Together with the pleasant body of the church they form an important architectural contribution to the Victorian civic building group of central Parramatta.***

In more recent times, the Conservation Management Plan for St John's Cathedral (Design 5 Architects, May 2018) undertook a detailed assessment of significance and noted the following (extracts only):

*St John's Cathedral and grounds are of State significance as the site of one of the two earliest Anglican parishes established in Australia, proclaimed in 1802; as the site of the first parish church in Australia, completed in 1803; and as the site of the longest serving continuous place of Christian worship in Australia.*

*The two towers, constructed between 1817 and 1819, and commissioned by Governor Macquarie, are of State significance as rare surviving fabric of the first parish church implemented by Lt John Watts, and the oldest remaining part of any Anglican church structure in Australia. As a pair, the towers are rare in Australian ecclesiastical architecture as one of a small number of church or cathedral towers constructed during the Colonial period in NSW, and are an important demonstration of Macquarie's desire to re-vitalise convict society through religion as well as education.*

*The location of St John's Cathedral, closing the vista at the southern end of Church Street, is a rare example of the link between civic design and the importance of the Church of England in NSW, and remains legible in the existing views along Church and Hunter Streets.*

*The location of St John's Cathedral within its landscaped setting, including its own grounds, the former St John's Park and the Church Street Mall, provide a landscaped open space area that not only has historic importance, but also strengthens the presence of the Cathedral and allows views of it in-the-round. This arrangement is rare in the CBD's of Sydney and Parramatta. The Cathedral, in particular the towers, continue to form important landmarks within the Parramatta city centre, particularly along Church and Hunter Streets*

*The St John's Parish Hall is of Local significance as an ancillary building constructed to support the operation of St John's Cathedral. Its value lies in its close proximity to St John's Anglican Cathedral, providing a clear visual link between the two structures and their associated uses. Its orientation eastwards reflects this association, as when completed the hall was accessed via the enclosed grounds surrounding the Cathedral*

### Trust Response to the Proposals

There are three primary proposals on exhibition to enable redevelopment on the site for two buildings - a commercial tower and mixed-use building:

- The draft site-specific DCP (Option A and Option B)
- The draft site-specific Planning Proposal
- The draft Planning Agreement

The following details our response to the three separate proposals.



### The draft site-specific DCP (Option A and Option B)

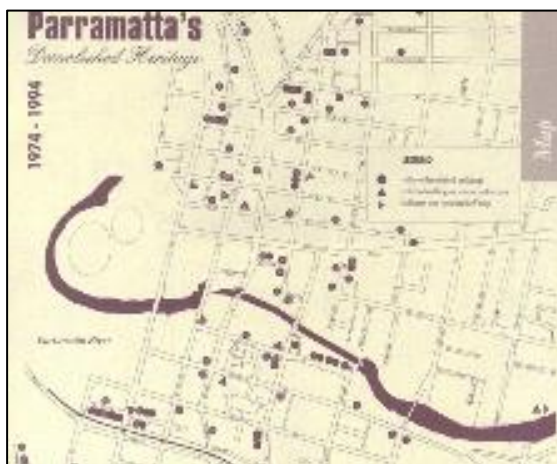
Proposes guidelines on heritage, public domain, built form, vehicle access and car parking, flood management, and environmental sustainability for two development options in relation to St John's Parish Church Hall (a local heritage item). The controls for Option A relate to removal and replacement of the Church Hall, and the controls for Option B relate to partial retention of the original c1910 Church Hall structure.

#### **Option A: Removal and Replacement of the Church Hall**

**The Trust strongly opposes this option**, which involves delisting and demolishing the local heritage item St John's Parish Hall. This c 1910 hall was a definite part of the Anglican parish's planning and has an important status in the history of ministry on this site.

The Design 5 Conservation Management Plan (CMP) and the several iterations of heritage advice provided by Hector Abrahams Architects clearly indicate that this item is of local significance and contributes to the overall significance of St John's ecclesiastical complex of buildings and elements. The National Trust supports those assessments of the Church Hall's significance and does not support the demolition of this item.

Parramatta is notable for its loss of heritage items, precincts and character areas, as illustrated by a Trust Alert in 1994 illustrating the heritage places demolished in Parramatta from 1974-1994 (see Figure 1). Further adding to this loss, particularly in the main city square, should not be considered or allowed.



**Figure 1:** Trust Alert – Parramatta's Demolished Heritage



**Figure 2:** St John's Church Hall, date unknown

Additionally, the Trust is deeply concerned that Option A is inconsistent with the CMP Policies for St John's Cathedral, including:

- **Policy 7.16:** ... Any proposals for retention or modification should consider the benefits of retaining the hall against the potential impacts and lost opportunities for enhancing the appreciation of the Cathedral within its setting and ensuring the ongoing viability of the Cathedral and its exceptionally significant use.  
**National Trust Comment:** The enlarged footprint of the northern tower proposed in Option A is not consistent with this policy. The proposed tower grossly encroaches into the visual setting of the Cathedral. This impact is not acceptable.
- **Policy 7.17:** Proposals to adapt or replace the Parish Hall could be considered appropriate provided they continue to support and strengthen the key aspects of significance of St John's Anglican Cathedral, in particular:
  - the continuation of use of the site for religious worship;
  - its landmark qualities within the CBD of Parramatta; and
  - an appreciation and awareness of the significance of the Cathedral generally.

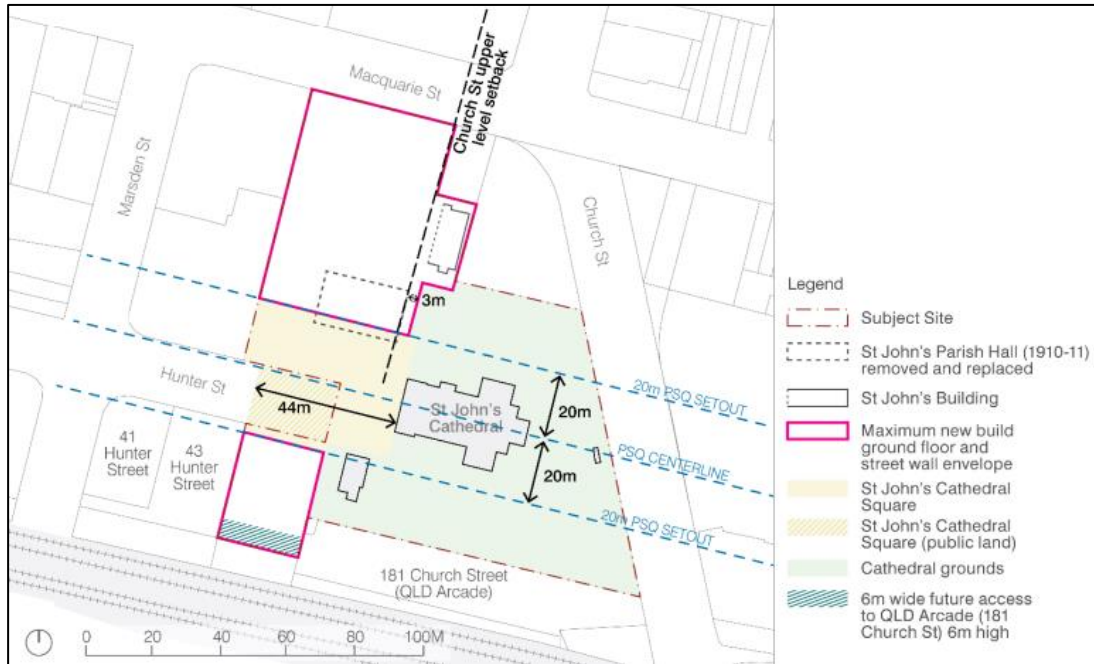
**National Trust Comment:** The enlarged footprint of the northern tower proposed in Option A, combined with the impact of the second proposed tower, is not consistent with this policy. The



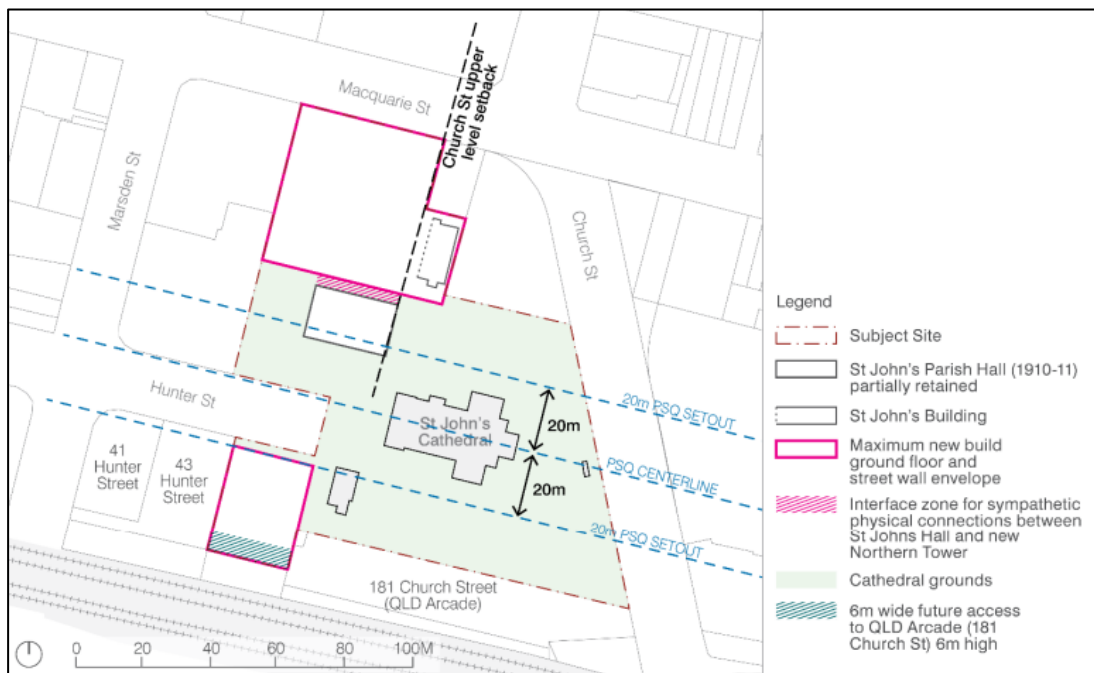
proposed towers unacceptably impact the landmark qualities of the Cathedral. This impact is not acceptable.

- **Policy 7.18:** Any replacement building should be sited such that it does not encroach further into the setting of the Cathedral. The eastern and southern boundaries should not extend further than the existing footprint of the 1910 building.

**National Trust Comment:** The proposed footprint of the northern tower in Option A extends further than the eastern boundaries of the original hall. In addition, this proposed tower will greatly impact the setting of the Cathedral and its landmark qualities. This impact is not acceptable.



**Figure 2: Option A - proposed northern building footprint**



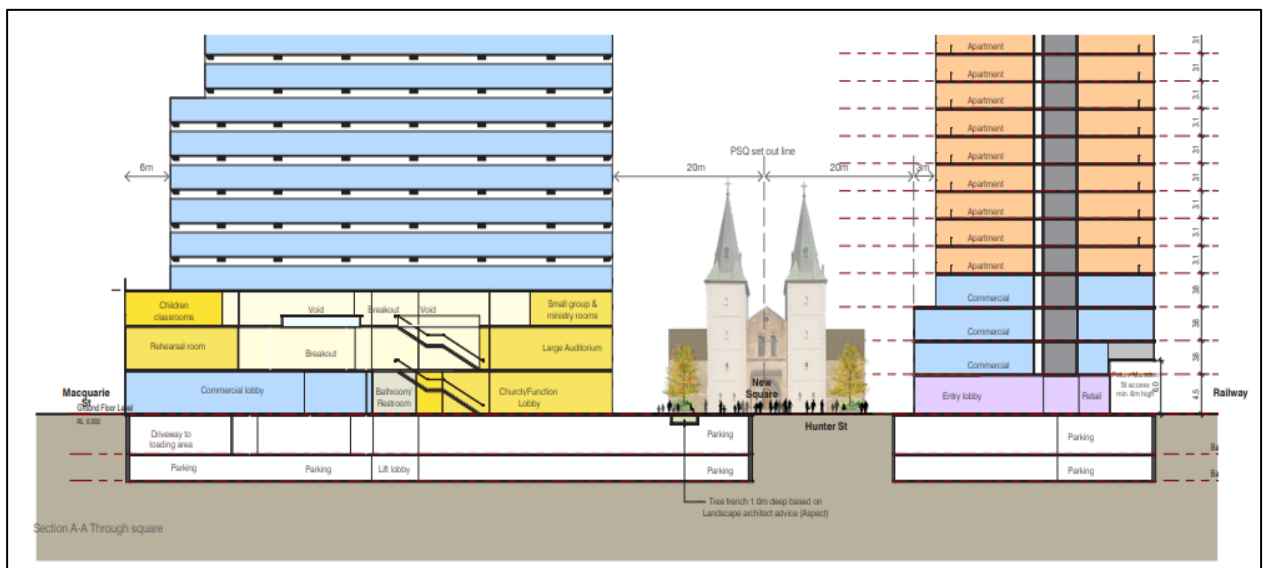
**Figure 3: Option B - Proposed northern building footprint**



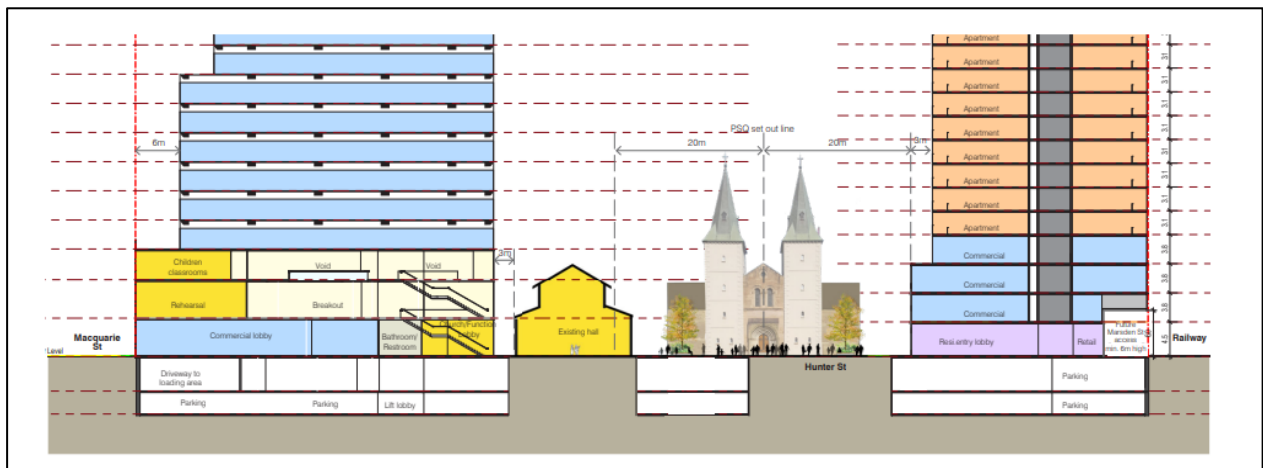
## Option B: Retain Church Hall:

It must be noted that both Option A and Option B, as currently presented, are not supported by the National Trust. However, the National Trust prefers aspects of Option B (retention of the Church Hall) over Option A for the following reasons:

- It retains the Church Hall, a locally listed heritage item which contributes positively to the significance of the St John's Church complex of buildings;
- It creates a smaller building footprint for the northern tower, resulting in a more slender tower form which is less visually dominant.
- It creates greater separation between the Cathedral and the northern tower, resulting in less visual impact on the Cathedral.



**Figure 4:** Option A, with larger building footprint and less setback between Cathedral and tower (at left of image)



**Figure 5:** Option B, with slightly smaller building footprint and larger setback between Cathedral and tower (at left of image) afforded by the retention of the Church Hall.

## Height and Scale of Proposed Buildings

The proposed height, density and scale of the proposed buildings in each option are not supported by the National Trust.

The current Development Control Plan controls, endorsed by Council for CBD Planning Proposal for this precinct, are based on the Heritage Study prepared by Urbis in December 2015 as part of the CBD Planning





Proposal process. That Heritage Study recommend that **sites adjoining the Cathedral retain the current zoning, FSR and height** which would have limited buildings on the subject site to an FSR in the order of 3:1 with heights ranging from 12 metres (2-3 storeys) to 32 metres (10 storeys).

Since 2015, extensive community consultation has been undertaken on the Parramatta CBD Planning Proposal. On the 3rd May 2022, the Planning Proposal, which incorporated community input and wishes for their city, determined the maximum height of buildings controls for the Parramatta CBD including the subject site, whose maximum height of buildings controls was set at of 18 /24 /36 metres.

However, the subject proposal for St John's Cathedral is to increase heights from 18-36 metres to 211 metres (or 243m including design excellence), an increase of more than tenfold. Additionally, it seeks to increase the floor space ratio from 3:1 to 10:1 (or 11.5:1 including design excellence).

The sheer magnitude of this increase of height and floor space outlined in the Planning Proposal is unrealistic, inappropriate and unfortunate. It does not balance the need for development with the values of this state significant site, nor does it align with the community's expectation of acceptable development scale.



Figure 6: St John's Cathedral current visual setting



Figure 7: Impact of the towers on the visual setting

The 2018 Independent Review of the Planning Proposal (Hector Abrahams Architects) reinforces this position, stating:

*The design of the proposed square presents the church on a uniform paved platform shared with two Highrise buildings. When placed together on a shared platform, **the scale difference between the high rise and the church building is most apparent and not reconcilable. The result is to render the church a mere small object ... and the historic buildings should not have their context removed in this abstract way.***

The proposed heights and scale are also not consistent with the following Policies of the St John's Church Conservation Management Plan:

- **Policy 5.5:** Given the importance of St John's Anglican Cathedral within the broader setting ... the potential impacts on views to, and the setting of, the Cathedral should be considered in any proposals for re-landscaping or other redevelopment in these areas.  
**Re-landscaping or redevelopment in these areas should seek to enhance the exceptionally and highly significant views to the Cathedral**, and incorporative means to interpret the historic landscape setting of the Cathedral



**Figure 8:** Current backdrop of sky to the towers from Centenary Square, still able to contribute to the setting and enjoyment of a place that has been a popular gathering place for generations.



**Figure 9:** The annual meeting of the native tribes at Parramatta, New South Wales, the Governor meeting them c1826, by Augustus Earle (National Library of Australia)

- Policy 6.1: The key views to the Cathedral should be maintained and enhanced.
- Policy 6.2: Views of the Cathedral and its towers ***within a backdrop of open sky should be maintained and protected*** in the views eastwards along Hunter Street and southwards from Church Street.
- Policy 6.3: ***Views of the Cathedral and towers within a backdrop of sky is desirable*** in the changing view from within Centenary Square as it moves southwards along Church Street Mall.
- Policy 6.4 : Any new development and/or landscaping proposals within and around the site (including within St John's Park, Centenary Square and along Church Street mall) ***should be sited so as to not obstruct or impinge on these views.***
- Policy 6.8: ***The significant setting of the Cathedral within its landscaped grounds***, including its historic and visual association with the adjacent St John's Park (current Centenary Square), ***must be retained, respected and not obscured.***
- Policy 7.5: Any new development located behind the Cathedral within the views from Centenary Square and southwards along Church Street ***should be sited and be of a scale such that it does not visually dominate the body of the Cathedral or the towers.***
- Policy 7.6: ***Any new development should be sited and configured so as to maintain direct sunlight*** on to the eastern and northern elevations of the Cathedral and grounds for as long as possible throughout the year.
- Policy 7.7: Any new development should be sited and configured so as to maintain at least 30 minutes of glancing sunlight as it reaches the western elevation of the Cathedral around midday in midwinter; and at least 20 minutes of sunlight at the equinox.
- Policy 7.8: ***Any new development on, or adjacent to, the site should be of a height, form and materiality that does not dominate the Cathedral or Verger's cottage, or detract from their existing setting*** within their landscaped open space.
- Policy 7.9: The street wall height (podium) of any new development adjacent to the Cathedral should not be higher than the eaves line of the towers (underside of the Cathedral spires). Taller buildings above this podium could be considered appropriate, provided that these are set back from the street wall edge, do not visually dominate the Cathedral and provide the minimum amount of sunlight in accordance with Policy 7.7 above.

**National Trust Comment:** The Trust does not support the proposed DCP, Agreement and Planning Proposal for its inconsistencies with these Policies, and recommends that they be used as the basis for any DCP for the site.



### Visual Impact Assessment

We note that the extensive suite of documents on exhibition does not include a Visual impact Assessment, despite the proposal having significant impact on a highly significant site. The Trust recommends that the proposal should not be considered until a Visual Impact Assessment, that takes heritage views into account, is submitted and publicly exhibited for comment.

### Summary

Zonings, floor space ratios, heights, and other planning controls must have as their overall aim of maintaining, creating and enhancing a varied and interesting urban environment. In Parramatta, nowhere is this more important than in the area which creates the main public square that houses the Cathedral and Town Hall – one of very few cities in Australia that has such a combination. The historical importance of this site is without question, and the current buildings contribute to this. What is at question here is the future use and enjoyment of this public space in Parramatta. A place with sunlight, gardens, historic buildings, and a unique history and character as a gathering place. This is a place that can be improved and enjoyed into the future, but not if this proposal proceeds.

The Trust does not advocate rigid and unnecessarily restrictive development controls with regard to listed items or places, but recommends that their significance as part of the national, state or local heritage should be conserved through controls that allow new and compatible development and associated works which respect the character of the place or item through enhancement rather than conflict.

The National Trust does not support the draft Planning Proposal and its associated recommendations and documents. They are not compatible with the significance of this extraordinarily important site, its setting and its values, and do not reach the delicate balance required when proposing extensive changes and impact to the setting of a state significant heritage place.

Yours sincerely,

Jane Alexander  
Manager, Advocacy