

3 September 2024

Mr Brad Roeleven
Development Assessment Officer
City of Parramatta
PO Box 32
Parramatta NSW 2124

By email: council@cityofparramatta.nsw.gov.au

Dear Mr Roeleven,

Development Application for the Roxy Theatre (DA/375/2024)

The National Trust of Australia (NSW) welcomes the opportunity to comment on the Development Application for 69 George Street Parramatta, commonly known as the Roxy Theatre.

The National Trust acknowledges the significance of the Roxy Theatre, noting it was opened in February 1930 as the largest and best appointed cinema in Sydney, with 1938 seats in an opulent Spanish Renaissance themed interior that also housed the largest Christie pipe organ ever installed outside of Great Britain and Europe. The Roxy was listed on the National Trust Register in 1975, and the statement of significance for this listing is noted below:

"The Roxy is probably the best surviving example in Australia of the Spanish Mission Style of architecture adapted for a large public building. The theatre is also the most characteristically cinematic, the most 'Hollywood' of Australia's early cinemas and one of the most beautiful based on the consistent use of the 'Spanish Mission' style throughout revealed in the original furnishings and fittings remaining generally intact. The entrance court surrounded by arcaded shops and dominated by the rich cinema façade is a unique pedestrian environment for a theatre in Australia and gives much interest to the streetscape because of the building's massing and architectural detail. It is largely unspoilt and a fine example of the world's first generation of buildings built especially for cinematic use."

We note that the prior proposal (2017) for the Roxy Theatre site included significant changes to the heritage fabric, including demolition to the rear of the building and the development of a large business tower in its place. The National Trust opposed this development, calling instead for an appropriate heritage outcome for this important place.

NSW Government Proposal

The National Trust note that this proposal is being put forward by the owner of the site and is before Parramatta Council for consideration. Although not directly applicable to the Council's assessment of this proposal, it is worth pointing out that in the recently published [NSW Arts, Culture and Creative Industries Policy 2024-2033](#) the NSW Government has made a commitment that it will deliver a final business case for the Roxy Theatre in Parramatta. We understand that this is currently being developed and suggest this is worthy of Council's consideration.



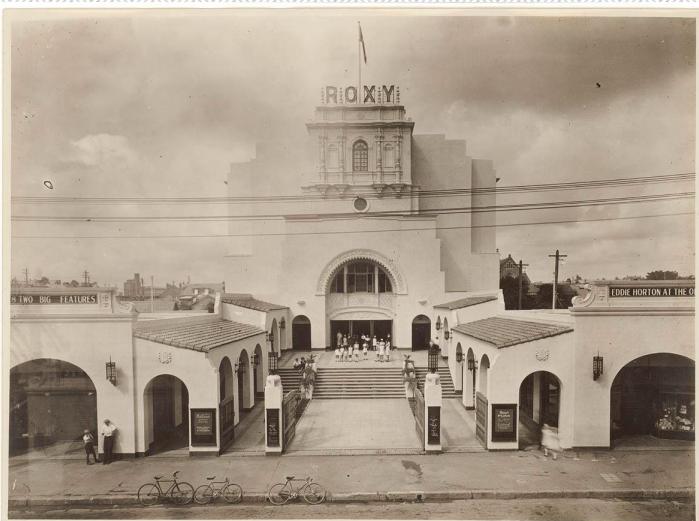
Current Application

The National Trust has reviewed the current proposal, including the architectural drawings, Heritage Impact Statement and Conservation Management Plan.

The Roxy Theatre is an iconic building in Parramatta, and one that has the future potential to be restored and once again considered among the most historic and remarkable examples of their type in greater Sydney. While the Trust is supportive of plans to ensure the conservation and preservation of this important building in Parramatta, we remain concerned that there are elements of the proposal which do not necessarily meet these objectives, and which may preclude the ultimate goal of returning this building to its rightful place alongside the likes of Sydney's State Theatre.

The Conservation Management Plan (CMP) has been reviewed by the Trust and offers a suitable starting point for the conservation of this building. We have also assessed the Heritage Impact Statement (HIS) specific to this proposal. Of particular relevance to this proposal are the following policies from the CMP, which have not been assessed in section 6.3 of the HIS (evaluation against CMP Policies) but which the Trust considers relevant:

Conservation Policy	National Trust comment
Policy 37 Removal of Significant Fabric <i>Fabric of Exceptional or High significance shall only be considered for removal or alteration where there is no alternative which would ensure the ongoing conservation of the place.</i> <i>Decisions regarding this action should take into account the use and significance of the place as a whole in evaluating alternative action and such evaluation should always involve appropriate input from conservation professionals experienced in the relevant area of expertise.</i>	The Western and Eastern elevations have been assessed as being of high significance. While the notion of a colonnade on the eastern and western elevations may be supported in principle as a way of responding to the new context of the Metro Station and plaza, the concern is that the removal of a large amount of original wall fabric is based on the assumption that the original theatre dimensions and seating stalls (and proscenium) will not be reinstated.
Policy 54 Decorative Elements, Fittings and Fitments <i>When the opportunity arises, missing or lost decorative elements, fittings and fitments should be restored based on investigation of documentary and physical evidence. Restoration of these elements should match the same design, profile, material, finishes and colour.</i>	There are many documented missing decorative elements. The reinstatement of these elements is entirely possible and will be a key component of any proposal. The courtyard café/bar spaces are particularly important in this regard, and (as stated in the CMP, Policy 51) original design elements of these spaces should be reinstated.
Policy 70 Auditorium <i>If opportunity arise, the interior of the auditorium may be reconstructed by:</i> <ul style="list-style-type: none">• <i>The removal of the introduced floor between the stalls and dress circle;</i>• <i>The reconstruction of proscenium, curved flanking walls of proscenium including organ grilles and pendant arcading; and,</i>• <i>Replacement of lost original elements.</i>	The National Trust maintain that this must be the ultimate goal of any true restoration project for the Roxy Theatre. The proposed scheme does not reinstate the stalls or the proscenium arch and original stage. The Trust are unclear as to the extent of original material remaining and are concerned that the lowering of the original floor and possible removal of remaining elements of the original stage (in addition to the numerous new external wall openings) will dramatically reduce any future opportunity for reconstruction of the auditorium.
Policy 82 Lifts <i>Lifts and other vertical transport system should be located at areas of lower significance, to minimise physical and visual impacts to significant spaces and fabric.</i>	While the Trust of course notes that new lifts will be required in the building, their placement needs to be well considered. The proposed lift, through its associated "Access Gallery" on the western elevation, will have a major intrusive impact on the main northern elevation.



The elevated access gallery on the western elevation will have an intrusive impact on the major significant northern elevation of the building as viewed from the entrance court. As the Roxy Theatre's principal elevation, it is defined by its symmetry. As per CMP policy 27, *the open space of the forecourt should be retained in its original form and as the principal entry to the site from the north.*



The current auditorium configuration (left) is a pale imitation of the original space (right) with the stalls, proscenium arch and flanking walls that gave the space its true architectural dimensions and theatrical capacity. The National Trust firmly believe that the opportunity exists to reinstate these elements and to truly return the Roxy Theatre to what historian and architect Ross Thorne described as *“one of the most, if not the most opulent or richly designed suburban picture palace in Australia.”*



The stalls and proscenium of the Roxy Theatre – able to be reinstated.

Conclusion

The National Trust earnestly desire to see the Roxy Theatre once again alive and operating, providing a unique experience in the heart of Parramatta, and there is an acceptance that the building will require some level of alteration to meet current building standards and cater for future uses. It is a building that is robust enough to withstand certain changes – including externally on its east, south and western elevations – and there is no issue in these being of a high level of design quality and responding to the historic building and the new context in which the building will find itself.

The issue at stake here is that, by a remarkable series of events, the Parramatta of 2024 has been fortunate enough to inherit one of the most significant theatre buildings in Australia, and any future proposals must begin with the conservation of this structure and its unique spaces and design features.

What must be considered in this application is the acceptable level of change that this state heritage listed building can withstand. The Burra Charter urges a cautious approach, and in this context there is a desire by the National Trust for any new use to fit the building, rather than the building be made to fit the new use.

Should it be so desired, any number of future uses (including many proposed in this application) could be contained within any number of new, purpose-built venues in Parramatta. The current proposal puts forward a series of changes to the Roxy Theatre which are predicated on the decision to never reinstate the stalls and proscenium.

While it may be the case that the reinstatement of the full auditorium space could occur sometime in the future, what must be ensured in the present application is that such an opportunity is not lost. Requiring that any proposal is conservation-led, and significantly reducing the proposed extent of demolition to original fabric must be a major consideration of this assessment. The Trust would urge further consideration of the design to ensure a more sensitive approach which allows for new uses (and future reinstatement of the original auditorium space) but not at the expense of original building fabric.