

13 January 2023

Mr Paul Sartor
Development Assessment Officer
City of Parramatta
PO Box 32
PARRAMATTA NSW 2124

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

Dear Mr Sartor,

National Trust submission relating to DA/960/2022

The National Trust of Australia (NSW) expresses its strong objections to the proposal for MBC House at 188 Church Street Parramatta.

Although the National Trust's Parramatta Branch has made a separate submission within the specified exhibition period, I am hoping you will also consider this letter when undertaking your assessment. Given the proposal was exhibited over the Christmas period it was unable to be considered in our usual timeframes.

The proposal is yet another example of an inappropriate and poorly justified design response in one of the most important areas of Parramatta – Centenary Square, home to the historic Parramatta Town Hall and St John's Cathedral. The fact that this design is not actually shown on the cover sheets of the DA Design Report, Built Form Analysis, or Heritage Impact Statement for this proposal speaks volumes.

Heritage Impact on Centenary Square

As identified in the Heritage Impact Statement (Weir Phillips Heritage and Planning), *Murrays' Building (and potential archaeological site)* at 186-188 Church Street, Parramatta is listed as Heritage Item No. I652 under the Parramatta LEP 2011. It is also adjacent to a number of other listed buildings and is an intrinsic component of the separately listed Centennial Square.

The Trust recognise that this area has seen dramatic change in recent years, and that further proposals will be forthcoming. This in itself is part of the problem, and a haphazard approach to individual sites in what must be considered first and foremost as a *precinct* in the city will continue to make a bad situation worse.

The Heritage Impact Statement notes (p.71):

"The proposed development is consistent with the changing context in the immediate vicinity.

The Murrays' Building is one of the remaining historic buildings that form a traditional street wall height datum between two-three stories along Macquarie and Church Streets. In the changing context of the Square many of the historic buildings are being retained and incorporated as a podium to new (or planned) development above. These developments which include but are not limited sites at 'Shops' (I655) and St John's Parish Hall (I713) which continue to retain the traditional datum at street level in conjunction with the emerging datum of new developments above. The proposal will similarly retain the existing pattern of low-rise historic



buildings surrounding the Square, while facilitating new development above. This is consistent with the Objective 3 of Section 6.5.4 of the considered DCP.”

The National Trust cannot understand how the addition of a six storey envelope directly above a heritage item is an appropriate response to Centenary Square and “*one of the remaining historic buildings that form a traditional street wall height datum*” in this area. We have reviewed Objective 3 of Section 6.5.4 of the DCP which this proposal is said to be consistent with, and it is worth quoting in full below:

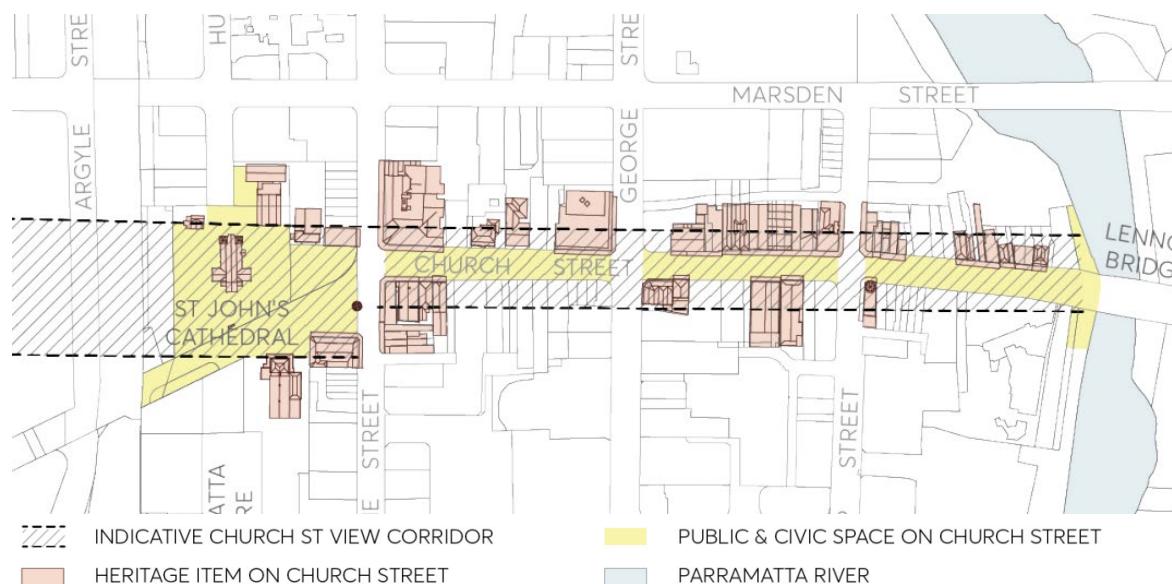
6.5.4 Church Street Special Area

*Objective 3: Preserve the low rise setting of Centenary Square **created by the existing 2 to 3 storey heritage items that flank it** as shown in Figure 6.5.4.2 to protect the heritage relationship between these buildings and their unique framing of Centenary Square.*

As the DCP states (p.6-86), the Church Street Special Area and Centenary Square is part of the original colonial town layout and “development must take care not to erode its evolved character, its vitality, grain and scale.” Critically, the DCP states (National Trust emphasis in bold):

*A consistent maximum building height along the entire axis of Church Street up to the Cathedral is applied to help preserve these views. The view corridor widens south of Macquarie Street to capture the spatial scale of Centenary Square and the grounds to St John’s Cathedral. **The most enduring and arguably most important civic space in Parramatta City Centre, the built elements that provide curtilage to this space must provide a sense of enclosure that is appropriately scaled.***

As the above guidelines and figure 6.5.4.1 from the DCP shows below, the development controls for the Church Street View Corridor and Centenary Square are very clear. The Built Form Study (p.15) by TKD Architects acknowledges that this site sits within the bounds of the corridor as indicated in the DCP.



Put simply, it is the opinion of the National Trust that this proposal is not consistent with the planning controls and objectives for this area. This site is clearly a heritage item within the defined view corridor, and the current height of 2-3 storeys is exactly the scale which contributes to the character and setting of Centenary Square.

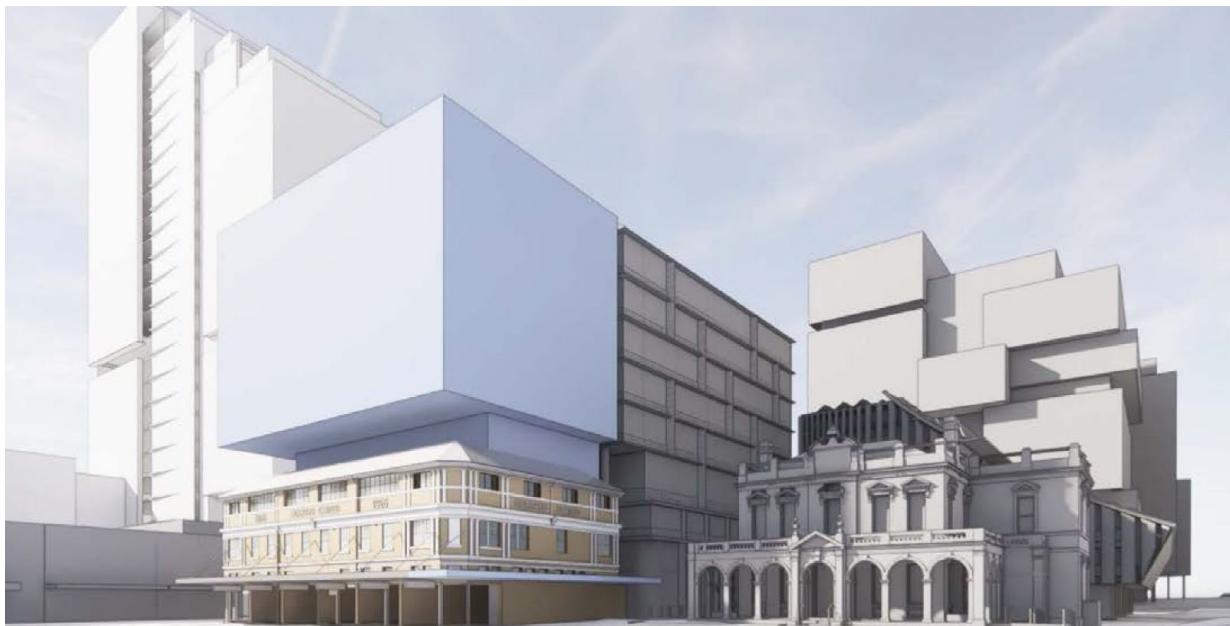
A six storey addition is inconsistent with the desired character of Centenary Square, and will set a very dangerous precedent for the remainder of the historic buildings which front Church Street all the way to Lennox Bridge.



While the reinstatement of sympathetic shopfronts is a positive outcome, the Trust simply cannot agree with the Heritage Impact Statement (pp.71-2) that *“The proposal will respond to both its position on the corner of Macquarie Street and Church Streets as well as its frontage on Centenary Square by retaining the original building at the principal structure at street level. The impact on the significance of the Square will be negligible as it will continue to be used an (sic) appreciated by the public while the framing the square as the centrepiece of Parramatta.”*

Centenary Square is already “framed” – by the existing buildings. This proposal introduces a new bulk and scale. What remains of the historic scale and character of one of the only actual the only commercial heritage buildings directly fronting the square will be obliterated by this proposal. Are the rest of the historic, heritage listed buildings within the Parramatta CBD to be subjected to the same treatment?

Parramatta Town Hall



Proposed building impact on Parramatta Town Hall (TKD Architects)

The National Trust are at a loss to understand how it can be claimed in the Heritage Impact Statement (p.74) that the visual relationship between the Murray's Building and Parramatta Town Hall is *“only fully visible in the winter months”* due to some London Plane trees planted in the square. This proposal reduces the visual prominence of the Town Hall dramatically and we would disagree that there is *“an appropriate separation between the new addition and the Murrays’ Building ensure that the relationship between the two buildings is retained.”*

This proposal, through its placement directly above an existing listed heritage building of similar scale to the Parramatta Town Hall, will completely overwhelm any sense of historic setting that this important civic building might otherwise retain. It will directly overshadow the area in front of this building at midday, and provide a sense of overbearing, rather than of openness, to this public space.

The adjacent building to the north of the Town Hall that is nearing construction will of course have some impact to this setting, but the dramatic intrusion of this proposed new building in front of the Town Halls’ building line will have an even greater negative impact on this area which the DCP Church Street View Corridor specifically sought to protect.



Not justified

The National Trust have reviewed the conclusion to the Heritage Impact Statement (p.82) that “*When viewed in context with other development in the vicinity, the proposed envelope will be dwarfed by other developments in the immediate vicinity. The development to the immediate east of the building is significantly larger in scale to the proposed envelope. Due to its smaller scale, the proposed addition will appear as a background element, blending into the hi-rise context, while the podium will remain the dominant element in the streetscape.*” We strongly feel that the impact of this proposal must be viewed against the adjacent Town Hall, Cathedral, and existing heritage item on the site, not simply the recent buildings surrounding Centenary Square. There is an existing scale and character to the streetscape of Church Street, and this site contributes to it. The proposed addition would alter this scale of 2-3 storeys.

The Trust were also dismayed to see that this proposal was being justified using the “Better Placed” Design Guide for Heritage produced by the NSW Government Architect. Better Placed talks about achieving “better fit” and suggests (p.24) that “*new infill buildings should generally be no higher than neighbouring heritage buildings or the predominant scale of the streetscape*” and that “*additions and new buildings should be designed to be sympathetic to these existing patterns.*” We cannot agree with the assessment of this proposal against this document. It is difficult to see how this new addition responds positively to the scale, massing, and grain of the existing building which it sits above, nor the wider setting of Centenary Square and urban pattern of Church Street. As the Burra Charter states, “*new work should respect the context, strength, scale and character of the original, and should not overpower it. The key to success is carefully considered design that respects and supports the significance of the place.*”

Conclusion

The National Trust cannot agree that adding a six storey addition above a heritage listed building, fronting a major historic public square, which has specific controls aimed at preserving its existing character can in any way be justified.

This particular site plays an extremely important role in creating the setting and character of Centenary Square and the adjacent Parramatta Town Hall, which Council’s DCP seeks to preserve. The existing historic building on the site plays an important contributory role in the scale and grain of Church Street.

The Murray’s Building can be restored and can have an ongoing commercial/retail use without this addition, and continue to play an important role in the vitality of this important place in Parramatta.

We would urge Council to reject this application.