

15th August 2024

J6372_01

Attention: Department of Planning, Housing and Infrastructure

Re: Review of Heritage Assessment
St Pauls Anglican Church,
No. 459 Chapel Street, Bankstown

1 Introduction

This letter provides a review of the heritage assessment prepared by GML Heritage (2024) as part of the peer review of the Extent Heritage, heritage study provided to the DPHI as part of its Transport Orientated Development (TOD) State Environmental Planning Policy (SEPP) rezoning of the Bankstown City Centre for the site at St Pauls Anglican Church, No. 459 Chapel Street, Bankstown.

The site of St Pauls Anglican Church is located at 459 Chapel Street, Bankstown on the eastern side of Chapel Street at the intersection of French Avenue. The site is located across three lots, being Lots 26, 27 and 28 of Deposited Plan (D.P.) 7058. Figure 1 illustrates the site and site components.



Figure 1: The subject site and allotments.

NearMap 2024; annotations by WPHP

The site is located within Bankstown Local Government Area. The principal planning instrument for the site is the *Canterbury-Bankstown Local Environmental Plan (LEP) 2023*. The site **is not** listed as a heritage item by Schedule 5 Part 1 of the LEP 2023. It is, however, listed as a draft heritage item as

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part of a heritage study for the draft Bankstown City Centre Masterplan that is being assessed by the Department of Planning, Housing and Infrastructure (DPHI) for Gateway Determination.

The GML Heritage Study includes the following extract from the inventory sheet of Extent Heritage in relation to the significance of the St Pauls Anglican Church:

St Paul's Anglican Church is of heritage significance at the local level for its historical, associative, aesthetic, social, and representative values.

St Paul's Anglican Church is of local historic significance as an Inter War church with later Post War additions that is demonstrative of the development of the suburb of Bankstown in twentieth century. Built in 1938 with later additions in 1961, St Paul's Anglican Church has a strong association with noted ecclesiastical architect, Norman Welland McPherson who was involved with all stages of the Church's construction. McPherson has an extensive portfolio of churches dating from the c.1930s to the mid twentieth century.

McPherson was responsible for the design of the 1938 church building and its 1961 front façade and bell tower addition, and the neighbouring 1945 Rectory. The site is also associative [sic.] significance for its longstanding connection with local prominent individuals and families from decades past.

The aesthetic significance of the site is embodied in the main church building which is a combination of Inter war and Post-war era design. The church building demonstrates a high degree of creative and technical achievement of the Post War ecclesiastical style with remnant internal Inter War Romanesque features. The front façade and bell tower make a notable contribution to the aesthetic qualities of the site, as well as the highly intact interiors where much of the original/early spatial and structural elements can be readily appreciated, including the exposed timber ceiling, timber trusses, and floorboards. A key feature of the church is the electronic organ which was installed in 1957 and dedicated to fallen WWII soldiers. Other internal features of note include various memorial plaques, timber pews, doorways and stained glass windows. No other buildings on site contribute to the aesthetic values of the site.

Although a comprehensive social values study was not undertaken as part of this process, the social significance of the church is apparent from the numerous contributions made by local parishioners extant at the church today. This includes many of the internal fittings, memorial plaques, and stained glass windows. In addition, the 1957 electronic organ was dedicated to fallen WWII soldiers which further signifies the social importance of the church to the local community of Bankstown.

The comparative analysis established that St Paul's Anglican Church is of a common and well-represented architectural style in the LGA. While it is one of the few known examples of McPherson's architectural work in the Canterbury Bankstown LGA, there are several well-known and documented examples of McPherson's ecclesiastical work across Sydney.

The St Paul's Anglican Church is representative of the development of religious church building in the twentieth century. It is a good representative example of an Inter War Romanesque style church with later Post War ecclesiastical style additions, designed by Norman Welland McPherson.

St Paul's Anglican Church meets the threshold for listing at the local level.

Heritage recommendations:

- *St Paul's Anglican Church meets the threshold for local heritage listing under historic significance (criterion a), historical association (criterion b), aesthetic significance (criterion c) and representativeness (criterion g).*
- *The site should be listed as a heritage item under Schedule 5 of the Canterbury- Bankstown LEP 2023.*
- *Conserve the church including its landmark qualities and its corner setting.*

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- *Conserve original or significant exterior and interior architectural detailing and features when planning change.*
- *Where possible, remove visual clutter from building façades to enhance visual access and streetscape appeal.*

The wider Heritage Study prepared by Extent Heritage was not available in the completion of this report.

2 Review against Heritage NSW Criteria

This assessment has been prepared with reference to the Department of Planning and Environment's Assessing heritage significance, Guidelines for assessing places and objects against the Heritage Council of NSW criteria (2023)

Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
<p>Criterion (a)</p> <p>The significance or the importance of a place or object in demonstrating the course or pattern of an area's cultural or natural history may be identified through the application of one or more threshold indicators, including earliness, representativeness, regional or local importance, distinctiveness or exceptionality, rarity, or some other quality of the place</p>	<p>St Paul's Anglican Church is of local historic significance as an Inter War church with later Post War additions that is demonstrative of the development of the suburb of Bankstown in the twentieth century.</p>	<p>St Pauls Anglican Church is an example of an Inter-war Church with later additions. To suggest that the additions to the church somehow contribute to the understanding of Bankstown's development in the twentieth century could apply to any building in the area with later alterations and additions.</p> <p>The site does not meet the threshold for listing under this criterion.</p>
<p>Criterion (b)</p> <p>A place or object has special associational value if it is associated with a person, organisation or group of people who have made an important or notable contribution to the course, pattern and development of our cultural and/or physical environment. In this context, special association may relate not only to the 'great' and well known, but also to the influential, the exemplary, and the innovative.</p> <p>Places or objects that meet this criterion might include those that:</p>	<p>Built in 1938 with later additions in 1961, St Paul's Anglican Church has a strong association with noted ecclesiastical architect, Norman Welland McPherson who was involved with all stages of the Church's construction. McPherson has an extensive portfolio of churches dating from the c.1930s to the mid twentieth century. McPherson was responsible for the design of the 1938 church building and its 1961 front façade and bell tower addition, and the neighbouring 1945 Rectory.</p> <p>The site is also associative [sic.] significance for its longstanding</p>	<p>The Church was designed by Norman Welland McPherson who was a well-known-ecclesiastical architect of the period. Some examples of his work included the Narooma Uniting Church (Heritage Item), St Andrews Anglican Church Roseville, Mosman Uniting Church (heritage item), Eastwood Uniting Church (Heritage Item). These churches, many of which are listed as individual heritage items, all display a level of visual cohesion without later additions confusing the original design intent for the church. Given the level of alteration to this church and also</p>

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Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
<p>demonstrate strong associations with a particular event, historical theme, people, or philosophies and ideologies</p> <p>are associated with significant historical events, regardless of the intactness of the place or any structure on the place.</p> <p>A place may be considered significant because an important historical figure was said to have lived there and accomplished significant achievements while living there. For example, a house and studio being of state heritage significance as it was associated with an important artist during the most productive period of their career.</p>	<p>connection with local prominent individuals and families from decades past.</p>	<p>given that the design was not executed to the original masterplan designed by McPherson, St Pauls is not considered to be a cohesive or well resolved example of his work.</p> <p>Most churches have strong connections the community that stretch over many decades as they are places where the community meet for both social and religious gatherings. This is no more significant than other community or social groups in the LGA.</p> <p>The site does not meet the threshold for listing under this criterion.</p>
<p>Criterion (c)</p> <p>The significance of a place or object of aesthetic significance may be identified through the application of one or more threshold indicators, including the degree of intactness, integrity, or deterioration of the place, or by its setting and location context, or by demonstrated representation, or by some other quality of the place.</p> <p>A high degree of creative or technical achievement may be identified through the application of one or more threshold indicators, including its intactness, integrity, whether it has received peer recognition or award or some other quality of the place. In some instances, places and objects</p>	<p>The aesthetic significance of the site is embodied in the main church building which is a combination of Inter war and Post-war era design. The church building demonstrates a high degree of creative and technical achievement of the Post War ecclesiastical style with remnant internal Inter War Romanesque features. The front façade and bell tower make a notable contribution to the aesthetic qualities of the site, as well as the highly intact interiors where much of the original/early spatial and structural elements can be readily appreciated, including the exposed timber ceiling, timber trusses, and floorboards. A key feature of the church is the electronic organ which was installed in 1957 and dedicated to fallen WWII soldiers. Other</p>	<p>The division between the Post War ecclesiastical style with remnant internal Inter War Romanesque features does not demonstrate a high degree of creative and technical achievement. Rather the transition between the two styles is awkward and abrupt, compromising both typologies. If the building was in its original form as shown in photographs of the site that exist from the 1930s, then it may have met the threshold for heritage listing under this criterion. However, in its current altered state, the building is not demonstrative of a high degree of aesthetic or creative significance.</p> <p>While the spatial qualities of the interior are readily appreciable, the interiors lack the innovation</p>

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have been so modified that they no longer meet the state threshold and might be considered of local significance.	internal features of note include various memorial plaques, timber pews, doorways and stained glass windows. No other buildings on site contribute to the aesthetic values of the site.	<p>or technical excellence needed to set this site apart from other churches of the 1930s-1950s period. The slightly lighter face brick in a plain stretcher bond is clearly distinguishable from, and with a clear joint to, the older section. The exposed roof continues the timber rafters and lining of the original section, but the timber trusses have been replaced by utilitarian contemporary steel I-beams that meet the walls in an unmediated manner, contributing to an overall unremarkable interior. The church lacks any technical or creative achievement in terms of its construction methodology for the period.</p> <p>The dedication to WWII soldiers in the form of the electronic organ and faux pipes can be salvaged or reinterpreted in a new space. Given that this organ was not the original pipe organ in the church, the organ other than the dedication does not contribute to the significance of the church.</p> <p>The site does not meet the threshold for listing under this criterion.</p>
<p>Criterion (d)</p> <p>The significance of a place that has a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons may be identified through the application of one or more threshold indicators, including the length of association for a community, the degree or extent of the association or</p>	<p>Although a comprehensive social values study was not undertaken as part of this process, the social significance of the church is apparent from the numerous contributions made by local parishioners extant at the church today. This includes many of the internal fittings, memorial plaques, and stained glass windows. In addition, the 1957 electronic organ was dedicated to fallen WWII soldiers which</p>	<p>While the congregation is associated with the church, as is typical for all churches, there is no evidence indicating that this association was unusually strong or distinctive enough to make the site particularly special. Stained glass windows, memorial plaques, including those to WWI and WWII Soldiers, and fittings are common in most churches across New South Wales. Objects of social importance are directly</p>

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attachment, a significant former association for a community or some other quality of the place.	further signifies the social importance of the church to the local community of Bankstown.	associated with the congregation and as occurs with congregations, can move with the congregation as and when this may occur The site does not meet the threshold for listing under this criterion.
<i>Criterion (e)</i> <i>The significance of the potential of a place or object to reveal information that contributes significantly to our understanding of NSW's history may be identified through the application of one or more threshold indicators, including earliness, rarity, extensiveness, intactness or some other quality of the place. Almost all places or objects of cultural heritage significance have the potential to yield information in some way; however, this 'potential to yield', or the degree to which a place or object may contribute to our understanding of an area's past, must be qualified by a strong presumption that a place or object has research potential.</i>	Not noted in the information supplied in the heritage assessment prepared by Extent Heritage that addresses this Criterion.	n/a The assessment does not suggest that either section of the Church or the outbuildings demonstrate construction techniques that were rare for their times or are of research interest. Assessment of archaeological potential is outside the scope of the original assessment.
<i>Criterion (f)</i> <i>The significance of the rarity or uncommonness of a place may be identified through the application of one or more threshold indicators, including intactness/integrity, distinctiveness, exceptionality or some other quality of the place or object.</i>	The comparative analysis established that St Paul's Anglican Church is of a common and well-represented architectural style in the LGA. While it is one of the few known examples of McPherson's architectural work in the Canterbury Bankstown LGA, there are several well-known and documented examples of McPherson's ecclesiastical work across Sydney.	The authors of this statement concur with the conclusions of this assessment, agreeing that the church is not rare. Given McPherson's prolific ecclesiastical work across Sydney and NSW over several decades, there are many intact examples of his work. The site does not meet the threshold for listing under this criterion.

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<p><i>Criterion (g)</i></p> <p><i>The significance of a place illustrates the principal characteristics of a class of cultural places. It may be identified through the application of one or more threshold indicators, including the degree of intactness/integrity, earliness, rarity or uncommonness, sustained use, exceptionality, or some other quality of the place.</i></p>	<p>The St Paul's Anglican Church is representative of the development of religious church building in the twentieth century. It is a good representative example of an Inter War Romanesque style church with later Post War ecclesiastical style additions, designed by Norman Welland McPherson.</p>	<p>The undefined hybrid style of the church is not of sufficient architectural note to be considered a rare characteristic in NSW. If the church were designed wholly in either of the styles it represents, it might be considered rare within the LGA. However, given that there are already at least eight listed churches and church halls in the LGA, this typology is already well-represented and is therefore not rare within the LGA.</p> <p>The site does not meet the threshold for listing under this criterion.</p>

3 Summary

St Pauls Anglican Church is an example of an Inter-war Church with major later additions, designed by ecclesiastical architect Norman Welland McPherson. The church lacks the architectural cohesion and intactness found in many of McPherson's other works, a number of which are listed as heritage items. The church's hybrid style, combining Inter-war and Post-war elements, is awkward and does not demonstrate high creative or technical achievement.

The church's interior, though spatially appreciable, lacks innovation and technical excellence. The dedication to WWII soldiers, while having significance, is typical of many churches. Such memorials are associated with the congregation, as noted above. The church's association with its congregation is typical of most churches and does not indicate any unique significance. The architectural typology as a church is not rare, as there are already numerous listed churches and church halls in the LGA.

St Pauls Anglican Church should not be heritage listed for several reasons:

- **Lack of Architectural Integrity:** The church's later additions disrupt the original design intent, leading to a lack of visual cohesion and compromising the original architectural vision as intended by McPherson.
- **Hybrid Style:** The transition between Inter-war and Post-war styles is awkward and does not represent a high degree of creative or technical achievement.
- **Unremarkable Interior:** The interior lacks innovation and technical excellence, with utilitarian steel I-beams replacing the original timber trusses. The church lacks any technical or creative achievement in terms of its construction methodology for the period.
- **Diminished Community Association:** The church's connection to its congregation is typical and not unusually strong or distinctive when compared with other social or religious groups in the locality.

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- **Well-Represented Typology:** The church typology is not rare within the LGA, which already has numerous heritage listed churches and church halls.

In its current altered state, St Pauls Anglican Church Bankstown **does not meet** the threshold for heritage listing under the Heritage NSW criteria for heritage listing as a local heritage item under the *Canterbury-Bankstown Local Environmental Plan (LEP) 2023*.

3.1 General Discussion in relation to the Church and development of Bankstown as a result of the TOD SEPP.

A large number of Christian churches of all denominations are listed as heritage items. Although they typically receive listing under a number of the seven standard Heritage NSW criteria, in today's cultural landscape, the most common areas of significance lie in their aesthetic and historical significance. These are the most recognisable significances in terms of the wider community. Social significance, on the other hand, holds direct importance to the congregation as it goes to continuity of worship and the sense of community this imbues.

While the wider community wants historic and beautiful churches to be conserved; they are not particularly concerned with the requirements of the congregation or with the financial requirements arising from the maintenance of churches. The wider community has an expectation that these churches will be conserved but are happy to place the financial burden of the conservation on the congregation, even if heritage status is imposed by Local Government. Certain churches assume immense historic and aesthetic importance to the wider community; however, St Paul's does not. It is not a significant example of ecclesiastical architecture as demonstrated by the above the assessment against the NSW Heritage Criteria.

St Paul's Anglican Church has had a long history of development, and additions to cope with the changing needs of the community. This expansion ran parallel with the expansion of the suburb which grew rapidly following the development boom in Sydney post WWII. The Church requires the freedom to address its current and future requirements in a comprehensive manner with a planning scheme which would enable them to meaningfully address and fund their accommodation requirements for a growing congregation, ministry and outreach whilst providing affordable housing for the community. It is important to consider the Church's place within the broader urban context of Bankstown.

This projected growth of Bankstown as a result of the TOD SEPP has the potential to have impacts on the Church that are physical, spiritual and service based. The Church is looking to the future in terms of how it caters for the growth of its diverse congregations. This includes the active consideration of providing a range of spaces suited to the worship requirements of the various congregations and the ability for those spaces to serve them. Whilst providing an opportunity for all members of the community to have the opportunity to access affordable housing. The Church must consider how these communities will evolve over time and whether new communities will emerge who will also require space for their services and for important religious, cultural and community events. The introduction of new housing and jobs has the potential to further swell the congregation of the Church. While new worshippers may be able to join the existing congregations, the influx of people also has the potential to create completely new congregations. New service requirements will arise from the increase in pastoral care that the Church offers to the community. Increased space and new office facilities will be required to fulfil these services. A heritage listing for the site will diminish limit the ability of the Church to provide these services and affordable housing which is in line with the projected growth of Bankstown.

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The most significant element of a church is not its buildings, but its congregation. If a building associated with the church is not of high historic or architectural merit, as is the case on this site, then a strong argument can be made for its removal and replacement with a building fit for purpose and provide for additional funds to support the church's ongoing function and the needs of the wider community through affordable housing.

Please do not hesitate to contact me on 02 8076 5317 if you have any questions.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'James Phillips', with a stylized flourish at the end.

James Phillips | Principal