

St John's Cathedral Site Parramatta - Planning Proposal

Response to Review of Heritage

prepared by

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for

Jattca

Review Summary

In May 2018 Jattca, on behalf of St John's Cathedral, lodged a Planning Proposal with Parramatta City Council.

Paul Davies Pty Ltd has been requested to respond to an independent evaluation of the proposal by Hector Abrahams Architects (HAA). Paul Davies Pty Ltd prepared the Heritage Impact Assessment that accompanied the Planning Proposal that considered the issues raised in the review. We received the HAA report on 15th December 2018.

Parramatta Council determined to seek a review of the heritage documentation provided with the Proposal and prepared a project brief selecting Hector Abrahams Architects (HAA) to undertake the work. Council posed a series of questions for which they sought specific responses as part of the brief.

This review looks at how the assessment was undertaken in terms of process and matters considered, and at the content of the comments made in relation to the matters raised. That is, it addresses both process and content.

The documentation submitted with the Planning Proposal is quite extensive and addresses (with regard to heritage particularly) the Cathedral and the other buildings on the whole site, the setting and the context.

The HAA review is set out in 5 sections:

- 1 A Summary;
- 2 An introduction;
- 3 The Authors assessment of the "Nature of the Site";
- 4 Key Issues and;
- 5 Answers to the Questions posed by Council.

The summary comments are addressed below (using the numbering of the HAA report):

5 The church building does not need a new setting. What is needed is the re-interpretation of the historic setting, in particular the definition of the western side and the removal of car parking.

There is no supporting material in the review for this conclusion. Whether the setting is re-interpreted, modified, altered or changed acknowledges that the current setting does not enhance the buildings as it could and has become compromised.

The Planning Proposal does not recommend removing what remains of the historic setting but does propose re-interpreting it. The setting, as now found, is very compromised from its 'historic setting' which was an open paddock that was fenced without surrounding buildings or landscape. The Cathedral and Parramatta deserve an excellent Cathedral and civic setting both of which are proposed in the Planning Proposal.

Removal of car parking at grade level is supported, enhancing the landscape that has evolved around changes largely driven by vehicles and the removal of boundary fencing to create urban public space is also supported.

If the focus of the comment is interpreting the western space, that can be more clearly articulated in the Planning Proposal or more fully explored in a design competition. The adjunct commentary on public squares and their failure is addressed in detail elsewhere but is not a valid consideration as it effectively discounts any public square in a city and the amenity of public places is an urban design consideration. The HAA comments are not a correct analysis.

6 The Church hall is of sufficient significance to justify local heritage listing and it should be conserved.

The CMP and HIS both conclude that the St John's Hall has moderate heritage significance at a local level. The HAA report agrees that the building has local significance however does not agree with the level of significance clearly set out in the CMP. The CMP, after considerable research, concludes that the significance is largely social and that the building is of low significance in relation to all other criteria.

The Planning Proposal sets out three potential ways to consider the building: retain; retain and adapt; or remove. It does not predicate one outcome as mandatory. The reason for considering the three options is to allow a future design competition a degree of freedom in how the whole site can be interpreted. It is the proposition of the Planning Proposal that if a design were to be submitted that removed or adapted the hall and achieved preferred urban and site outcomes that it should be considered.

If St John's Hall is required (as suggested by the reviewer) to be retained with or without adaptation, the operation of the St John's Parish and the potential to enhance the Cathedral use of the site is compromised. As the site has a long history of adding and removing elements in a quite random way, it is historically appropriate to consider how the St John's Church Hall building may or may not fit into the future use of the site. Consequently, allowing the potential of the three options is appropriate and does not affect the heritage listing of the building.

- 7 This does not preclude the resumption of Hunter Street for a new square, a separate study is recommended to consider this.**

The western end of the Cathedral is the front and main entry of the building. The concept of having the current space in front of the Cathedral at the western end, a fence (presumably) and then a further public square in Hunter Street is not being proposed and is not part of the Planning Proposal.

Acknowledging that the original site boundary to the west needs to be re-interpreted and the western setting recovered as a non-parking and garbage disposal area, does not preclude conceptually extending the current space. As the Planning Proposal is not a design, incorporating material that ensures the interpretation of the current church boundaries is achievable as part of a Design Competition.

- 8 The erection of High-rise towers on land the church owns is not precluded and is not a heritage issue provided the church yard retains its historic integrity.**

If new development takes place on the church land as supported in this statement, it will interact with the land that was the historic church yard. Any new development will do this no matter what it is. That is also the historical pattern of development on the site.

There appears to be a fundamental misunderstanding of the site set out in the review that affects much of the commentary provided. There is reference to the 'historic church yard' throughout the review but the 'yard' no longer exists in its original form, its later Victorian period form or in its early to mid-twentieth century form. The concept of a church yard was removed in the 1950s when the site became an urban site. The site boundaries are discernible and can be interpreted but the idea of 'historic integrity' is incorrect.

It is also incorrect to directly relate the height of new buildings to the retention of the integrity of the church yard. There is no integrity remaining. Any re-creation of a church yard would be conjectural and based on picking a period in history that appeals as there is no particular form of the setting that is more or less important than any other.

The key issue perhaps is to ensure that the setting of the church and its early boundaries are not lost and are positively responded to in the re-interpretation of the site and setting that will take place.

- 9 Towers overhanging heritage buildings is not supported.**

There are several conceptual approaches to how new development should interact with and relate to heritage buildings. There is no absolute approach that must be adopted.

The view expressed in the review is that, in this case, an overhang of a new built form is not supported and that a heritage building should have sky above it. This is a conservative and safe approach but not the only approach nor is the basis of that view set out in the review.

There are excellent examples of heritage buildings having new development close to them, partially over them, inserted into them and in some examples, where new built forms are built over and around the heritage element, enclosing it within new built forms.

While the reviewer's views are noted, it is important to acknowledge that there are other approaches and the Planning Proposal while providing for a 'maximum' approach does not

mandate that design approach. It would not be sound to unduly limit the scope of a design competition by placing very restrictive and conservative controls that may prevent an excellent design solution for the whole site being developed.

- **The purpose of the independent Review**

We would suggest that the review has not satisfied the brief requirements in that it does not provide a review of the proposal or the supporting material but rather has set out its own basis of analysis and then limited the review to several areas. We would have expected that the review made reference to the various documents, not necessarily in detail, but to provide advice to Council on their general adequacy, the methodologies used and perhaps a brief summary of matters that the reviewer thought were helpful, or which may require further input.

We also would not expect a review to offer an alternative view of how the place could be developed (particularly as it is not based on research) but to discuss the actual proposal. Apart from the selected detailed matters this has not taken place.

The purpose of a review is twofold: firstly, to provide advice on the approach within the various documents and if they are sound and secondly to identify specific areas that the reviewer considers require further work or a different approach.

We suggest the review does not achieve its fundamental objective and does not provide a balanced assessment of the Planning Proposal.

A Detailed Response to the Review

Each section is reviewed in detail below.

1 Introduction

HAA cites the documents that form the material to be reviewed:

- Draft Conservation Management Plan prepared by Design 5 1 May 2018
- Heritage Impact Assessment prepared by Paul Davies Pty Ltd May 2018
- Urban Design Report by Architectus May 2018
- Concept Landscape Masterplan by Aspect Studio May 2018
- Archaeological Report by Curio Projects May 2018
- Traffic Impact Assessment by Traffix May 2018

The Introduction advises that the review specifically refers to the Draft CMP, it is assumed that the other material, while not specifically referred to in the report, has been considered.

The brief to the consultant is unusual as it requires comment on four questions that relate to the St John's Church Hall and how the Planning Proposal options should be assessed in relation to that element. However, the heritage considerations around the site are much broader than that issue, even though it is a matter to be considered.

The review addresses the four questions but focuses on the area to the west of the St John's Cathedral. The review does not provide any comment on the Cathedral or other buildings on the site.

The review does not set out a methodology or which issues are to be considered or not considered, nor does it make any positive comments about aspects of the proposal that are supported. It would be good practice to establish a clear basis for the review, the issues to be canvassed and for matters that have been addressed to the authors satisfaction to be acknowledged.

On balance, the review appears to be a series of personal views about the site and the proposal rather than an independent review of the material submitted.

2 Nature of the Site

HAA does not review the draft CMP but notes that it is deficient in that, in their opinion, the CMP considers the buildings on and around the site *"but not the design of its site, being the church yard and grounds"*. The CMP was prepared by Design 5. Dr Mark Dunn, a noted historian researched and prepared the history of the site. The Draft CMP is a thorough and soundly researched document that correctly analyses the history and development of the buildings and site.

The review then sets out HAA's interpretation of how the site has developed providing their own site sketches and, presumably using images from the draft CMP.

This is an unusual way to commence a review as it does not actually review the Design 5 material but rather puts it aside and sets out a new but unresearched and unvalidated view of the site history. It is

also unusual as, despite the criticism of the draft CMP analysis, it almost replicates the site development drawings in that document.

Set out below is a detailed response to Section 2 but as an overall comment we do not believe that the review provides a sound basis to form the opinions that are later expressed.

HAA divides the history into 4 periods:

Up to 1823

No new material or understanding is set out for this period that is not in the CMP.

1856-1926

The report is correct in noting the long and important role of Rev Gunther and the expansionist period in adding to the church site but is not correct in prioritising this period as the most significant one.

The changes in this period fundamentally altered the early character of the site and introduced a new character. This became a pattern seen again in the 1950 period.

While this is noted in the review the analysis does not set these changes into a correct contextual understanding. The works that took place were intended to enhance the site, add facilities and add land for expansion, but there is no overall clear intent or grand plan evident in any of the works, rather, they are the accumulation of a series of ideas and changes that most likely occurred when opportunities arose to add to the site. That is, while the changes are of some significance as part of the gradual evolution of the site, they do not individually or collectively establish a form for the site that is of particular significance at any point in the history of the site.

There is a significant difference of opinion on how the church site developed.

1926-1953

1926-1953 is not considered and presumably is not particularly significant in the reviewers' consideration.

1953-2000

HAA notes that from 1953 the civic 'eminence' of the site comes to the fore. This is correctly observed as removing the fences and changing the planting created a public rather than a private setting for the buildings. The analysis focuses on the importance of the paths. Reference is also made to the Queensland Arcade addressing the south of the site "making entry possible on that side". This is not correct. Queensland Arcade was not and is not part of the site and while there may have been a connection, the Cathedral has always been accessible from the south.

HAA observes that paths were formalised into a gravel drive on both sides of the Cathedral leading to a western court. This is incorrect in analysis. It would appear very clear that the changes were driven by changes in transport, the need to accommodate cars around and near the building and a shift from paths to driveways. The paths were already 'formalised' and were then expanded to driveways. Figure 8 (in the HAA report) demonstrates this with cars parked to the south and the west of the building. The entry from the east is now a driveway rather than a pedestrian access and contrasts strongly with Figure 6 (in the HAA report) which is pedestrian and landscape focussed.

St Johns Park is noted but it also falls outside the site boundary and while a public space is not part of a consideration of how the church lands have changed (except by reference).

We disagree with the analysis provided in this part of the review.

2000 - present

The analysis notes the extensive change from 2000 with large areas of paving, changes to traffic, an increase of on-site parking and the commencement of the new Parramatta Square. The report notes that the historic scale of spaces around the western side of the Cathedral has been blurred but makes no observation about other significant site changes. Tree removal and changes to the St John's Hall are noted. It is also noted that these changes have been made in collaboration with Parramatta Council.

Summary of Integrity of the Church Yard

The above observations are selective and, this review suggests, in places incorrect.

The review summary concludes that the Cathedral has *"largely retained its civic urban relationships and eminence, and the landscape order of the 1950s landscaped grounds which were developed out of the site as bought about in the time of Archdeacon Gunter. The cathedral is settled in a park which arose from and recalls the historic vegetated character the churchyard for which there is important relationships and evidence from the colonial period."*

There is no basis for this statement in the analysis that HAA has set out, in fact in many respects the opposite view is evident in the analysis. It is also not the view that is found in the the history and historical development set out in the draft CMP. The evolution of the site cannot be limited to one or two selected dates. While more major changes took place at particular points in time, the site has evolved slowly and regularly in response, in many cases, to development and redevelopments around it and does not reflect any particular historical period.

There is no discussion or analysis in the review of:

- the early church site and how that has changed with expansion and new built elements (the Draft CMP sets this out in some detail at pages 51-59);
- how the Gunther period changes affected the colonial setting (which they did);
- how changes in transport and approaches to city development impacted the "colonial churchyard" setting;
- what features or characteristics that are asserted to remain from the colonial period or which strongly reference that period (putting aside the cathedral building itself) remain; and
- why the Gunther period has been given such significance and considerably more significance than the colonial form of the site.

These would all seem critical aspects of defining a different view of the history of the site if that is to be relied on rather than the extensively researched CMP.

This response suggests that the independent report does not have a methodology and as a result provides inconsistent and unreliable commentary on the Planning Proposal. We would suggest that a possible methodology (noting that there is no prescriptive model for a review) could be:

- 1 Identify the documents that form the proposal.
- 2 Provide at least a brief comment on each document as to its overall adequacy irrespective of whether the reviewer agrees with everything within the document.
- 3 Identify specific areas within the documents that may require additional material or where the reviewer considers the outcomes not to be sound and in need of review.
- 4 Provide a summary of the suitability of the proposal, as a whole, or set out why the proposal as a whole is not supported.
- 5 If the proposal overall is supported but specific aspects of the proposal are not, identify those and provide a brief commentary as to why those aspects of the proposal are not supported. If it is a question of providing additional information, identify what information is required.
- 6 In conclusion provide a balanced assessment of the strengths and issues of the Planning Proposal.

It is appropriate to rigorously review any proposal but that must be within a context of a balanced and thorough review.

Summary of the Setting of the Site

HAA makes several observations about the setting and site that are summarised below with our comment:

Report Item	Comment
1 there is a strong visual relationship between the Cathedral and Town Hall/Macquarie street	Agreed. This exists and is historically relevant and will be strengthened through the process of the Planning Proposal
2 there is a strong visual relationship to the low-rise buildings around it	There is, however with the changes taking place broadly around the site this will change irrespective of this proposal. This also relates to point 8.
3 Centenary Square has diminished the setting of the cathedral in form and installations.	This is the personal opinion of the author and is a comment about council's management of the city rather than the current proposal. It is not really relevant in this assessment.
4 It is no longer visually connected to Government House but retains its landmark status	The connections to Old Government House (and the burial ground - not noted in the earlier assessment) are long removed and while they were important did not survive for many years. Landmark status is a separate matter. The Cathedral is a landmark and later comments in the review note how that will actually be enhanced by major city works such as Parramatta Square.
5 Long views culminate at the Cathedral	This is correct and is unchanged by this proposal or other proposed city works. The proposal removes the four-storey height at the Hunter St boundary as called for in the existing DCP that is currently CPC policy and enhances the long views to the Cathedral.

6 Parramatta Square enhances the centrality of the Cathedral in the city	This is an interesting observation and would appear to conflict with point 3 above. There seems to be a mixed response to changing the setting of the Cathedral where it is desirable in the author's view to change the setting outside the site but not within the site. This is difficult to comprehend as there is no analysis or basis for the opinion.
7 The Cathedral terminates the square at the western end	This is true, it will visually terminate the new space in both the physical form of the building and also the landscape. This will be the case due to the location of the Cathedral building rather than in relation to the site.
8 The buildings immediately around the cathedral: the St John's Hall, The St John's (office) Building and Queensland Arcade are of a sympathetic scale to and setback from the cathedral	This is partially true in that there are smaller scaled buildings around the cathedral, but immediately adjoining a number of these are significantly larger buildings. The DCP also allows 4 storey buildings in the vicinity of the Cathedral building. The residence is not mentioned.
9 The trees contribute to the setting.	This is agreed.

There is no discussion in the analysis of the value of the western part of the site, the role of the ancillary buildings apart from their scale or why the site in its current (or perhaps altered) form is important. There appears to be no basis for the key issues section of the document arising from Part 2 of the report.

3 Key Issues

3.1 Setting of the Church

The first issue raised is about the 'churchyard' or the church in its yard. The following observations about the churchyard are made in the report with comment:

Observation	Comment
<ul style="list-style-type: none"> the church building has always been surrounded by a church yard 	<p>This is not correct. The review clearly notes that the churchyard, as a definable space, ceased around 1953 with the erosion of the edges of the site by removing the fences and creating a public park setting that extended to Centenary Square. This was further eroded by car access and parking.</p> <p>The Parish and the Council have collaborated over a number of years to create an integrated public space.</p> <p>The site boundaries remained discernible (as they can in the future), but the Cathedral now sits within public space and not a church yard.</p> <p>The analysis on this matter appears flawed and there is no argument in the review that is persuasive on this.</p>

<ul style="list-style-type: none"> the yard was amended and landscaped as a public park 	<p>This is true in part however the concept of 'amend' is not accurate or appropriate, the setting changed, as it had been doing constantly over the life of the site.</p>
<ul style="list-style-type: none"> the yard has a strong relationship to the urban plan of Parramatta 	<p>This is not supported by analysis. The site and overall setting have a strong relationship and historically it was a churchyard, but the concept of a church yard no longer exists.</p>
<ul style="list-style-type: none"> the vegetated landscape is equally important 	<p>Vegetation as noted is important, but it is also noted that the early churchyard is illustrated void of landscape which is also of importance.</p> <p>The Planning Proposal includes landscape as a key element of the future character of the whole site.</p>
<ul style="list-style-type: none"> until 1953 the yard was enclosed by fencing (of various forms) 	<p>This is factual and noted.</p>
<ul style="list-style-type: none"> the current park from 1953 altered the relationship of the cathedral to the city 	<p>This is agreed and the Planning Proposal maintains and strengthens the cathedral/city relationship.</p>
<ul style="list-style-type: none"> the changes maintained the historic entrances to the site in the form of defined paths 	<p>This is partially true, but the evidence shows that the site is now a very permeable site without actual entrances as were evident when it was fenced and was a churchyard.</p> <p>There are paths remaining and driveways and large open areas used for parking and utilities and events. Entry points are recognisable but not in terms of defined and marked entries as was the case with a fenced yard.</p>
<ul style="list-style-type: none"> The HAA report notes that the planning proposal disrupts the historic setting by <i>"removing the defined churchyard to the west of the Cathedral"</i> and, <i>"the historic space of the churchyard is removed"</i>. The review notes that this is the least defined part of the setting but <i>"this is not a reason to remove altogether the integrity of the church site"</i>. The report further notes <i>"A proposal that interprets the historic space within which the church building was set is warranted"</i>. 	<p>This raises a number of questions but focuses on a single issue. The main concern raised is the loss of definition of the earlier western site boundary and the removal of finer grain from the grounds in terms of variety of pavements and layout of the remaining paths. HAA appear to have mixed and somewhat conflicting views on the nature, purpose and potential viability of squares around churches as later in the report they note that squares do not work but also note that a square beyond the western boundary would be appropriate.</p> <p>HAA do not define or analyse what is the appropriate setting (as the original boundaries have been altered) and which boundaries should be interpreted. The early site boundary and fencing extend through the current St John's Hall as that building is built partially within and partially outside the early 'churchyard' consequently, it is not possible to recover that setting without removing the hall.</p> <p>If the concern is understanding the historic extent of the western land, this can be achieved by detail on the site - with or without a new civic space - by changing material, subtle change of level, use</p>

	<p>of devices within the space to mark the boundary, potentially retaining gates as a symbolic element on the boundary alignment or a range of similar interpretive devices.</p> <p>Similarly, the pavements and layout around the Cathedral building can be developed to retain some of the historic form and path layout if that was considered desirable. These comments can be incorporated into the planning proposal noting that the proposal is not a design but an overall approach to the site and surrounding area.</p> <p>A current difficulty with the western portion of the site, that is not acknowledged in the review is the lack of functionality of the area and the effective use as a rear yard even though it is the main Cathedral door. The area is used for parking, rubbish collection and events. The St John's Hall and its extension extend into the area in an uncomfortable relationship. The current edge arrangement of low walls, partial fencing, gates and bollards is clumsy and does not enhance the place. There is also no recognition that during the key period that HAA note, the site expanded to the west along Hunter Street significantly changing the early 'yard' arrangement. With the potential for new development, extending the western space is logical, sound and does not have to affect any heritage values.</p>
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HAA raise four items that they believe should be recognised as part of interpreting the 'historic space'. It is not clear what the 'historic space' is in this reference as it could be the western area or it could be the whole site. The points to be recognised are, with comment:

Observation	Comment
<ul style="list-style-type: none"> the historic boundary of the allotment established by Macquarie 	<p>This can only be partially recognised as buildings now encroach across that boundary. If the St John's Hall were to be removed (one option in the proposal) the whole of the allotment may be capable of interpretation. Irrespective of this, the original yard boundaries can be interpreted and this can be incorporated into the proposal.</p> <p>Also of importance is that the HAA analysis does not recognise accurately the changes that have taken place to the yard.</p>
<ul style="list-style-type: none"> the amount of space historically defined in front of the western towers, which is in proportion to the towers 	<p>The scale of the space in relation to the towers is an opinion of the report author and is not otherwise analysed, researched or established. We dispute the opinion and would consider it an incorrect understanding of the space and the towers. The lot was established before the towers were designed or built, they were added to the end of the early church within the site. Later the church was rebuilt retaining the towers. There appears to be no evidence suggesting they were designed in relation to the scale of the space between the church and the fence, in fact, this is highly unlikely. It would however be likely that the towers were designed to the maximum size then possible to</p>

	<p>make them visible at the centre of the city and in relation to Government House and other key locations. The towers were not an element designed to be seen from within the site or to relate to the site dimensions, they were a district or landmark element.</p> <p>The Planning Proposal maintains key site lines south along Church Street, from the west along Hunter Street and from the new Parramatta Square.</p> <p>We believe the HAA report is in error in this statement.</p>
<ul style="list-style-type: none"> The integrity of a church yard or grounds that have a considered network of paths, based on the network designed in the Gunther period, and reinterpreted in the 1953 redesign 	<p>This is not a correct or accurate statement.</p> <p>The current state of the grounds has largely removed the Gunther period site layout, remnant elements remain but the path network that is focussed upon in the review now longer exists.</p> <p>The 1953 re-interpretation is also incorrect. The 1953 works were pragmatic in that they opened up the site, removed fences but retained the established access. There was no 're-interpretation' of the site.</p> <p>The 2000 period works then removed most of the Gunter and 1953 changes to create a paved open space with a focus on vehicles. This was in collaboration with Council.</p> <p>In the terms set out in this point the church site does not have integrity to the periods noted. There is also no reason given as to why these periods should have pre-eminence when interpreting or re-defining the site.</p>
<ul style="list-style-type: none"> Planting of appropriate trees in all parts of the grounds 	<p>This is disputed and is not historically correct or valid.</p> <p>The inference is that the western forecourt should be planted as the reference is to all parts of the grounds. This would not assist the historic setting or an interpretation of this. The eastern and southern plantings provide the park-like setting that is references but the western frontage is distinctly different and appears to have always been distinctly different in character.</p>

Having noted the above discrepancies and issues, it is agreed that interpreting the Macquarie boundary is sound but, as noted, this does not preclude a larger space being developed to the west of the cathedral.

HAA then comment on amenity. This is not really a heritage issue in the terms set out and HAA are careful later to observe that they are not providing planning advice and it is not clear if the report is intended to provide urban design advice.

The issue specifically raised is that urban squares related to churches are not successful. Sydney and Queen's Squares are cited and criticised for their lack of focus, their windiness, shaded character and

for their principle use as pedestrian thoroughfares. These comments are not correct, are not based on analysis or research and are personal opinion and preference.

This is also not a heritage issue.

Two squares were cited as examples, the major square in front of St Marys Cathedral was not included, possibly as it does not fit with the criticisms being made. Looking briefly at Sydney Square and the criticisms levelled at squares around churches we make the following comments (noting that we are the architect and heritage consultant for St Andrew's Cathedral and the school building behind that forms the western edge of the Square).

- The space is not ideal, it was created in the 1970s and involved the removal of the churchyard around the cathedral with its then extant early fencing and the stone deanery designed by Blacket. However, the creation of a large civic space between the cathedral and town hall created a space that is highly valued within the city.
- It provides for large community events including rallies and protests.
- It provides for the cathedral school to hold events including festivals, fetes, musical ventures, etc.
- It is used intensively as a day space for people who have lunch there, sit in the sun or shade, meet etc. (curated by the City of Sydney)
- It provides a suitably scaled space for events related to the use of St Andrew's Cathedral and the Town Hall.
- It is sunny and pleasant but can, like all city spaces be windy, however, the wind is not a product of the square but the city development irrespective of whether the area is a public square or a fenced church yard.
- The space has focus, the focus is the cathedral and the town hall, the space itself does not require focus

The HAA report provides an opinion on the relationship of the proposed open space to the west of the cathedral to the proposed development and the cathedral building.

We note that the review does not discuss the current condition of the western part of the site or the Hunter Street area and there is no comment on the functionality of the space and how it currently works or could, in the authors view, work in the future. There is also no framework for council's intent for adjoining areas in terms of future development through the current planning provisions. While this is not a planning review, the planning framework significantly affects how the site can be considered.

The core of the response to the question of setting is found in paragraph 2 of page 12 of the HAA report. It is quoted in full and then considered in detail as it is a central part of the review.

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 most apparent and no (stet) reconcilable. The result is to render the church a mere small object. In other words, the church building is a cup on a tray. In scheme 1 the hall is placed on the same tray, which provides some relatable scale, however this is no real difference, and the historic buildings should not have their context removed in this abstract way.

Observation	Comment
<ul style="list-style-type: none"> <i>The design of the proposed square presents the church on a uniform paved platform shared with two Highrise buildings.</i> 	<p>Three options are set out, this refers to one of those options only. It also does not acknowledge that the planning proposal clearly creates low scaled forms around the edge of the proposed space with larger elements set back beyond. It must be presumed that the author does not consider any part of the proposal acceptable in terms of scale, principally as it all shares a common forecourt but possibly (not specified) due to the overall scale. However, under 4.1 of the report HAA notes that there is <i>"no heritage issue with regard to FSR and height"</i>.</p> <p>It is not clear what the review intends except that a forecourt is not supported.</p>
<ul style="list-style-type: none"> <i>When placed together on a shared platform, the scale difference between the high rise and the church building most apparent and no reconcilable.</i> 	<p>The issue raised is one of scale and that a common space linking new and old elements (presumably in any of the scenarios put forward) exacerbates differences in scale to a point that is not reconcilable.</p> <p>The statements do not offer any advice on what may, in the authors view, be acceptable.</p> <p>The review notes that height and other planning issues are not of a concern (except shadowing) so it is assumed that it is the extension of the public space that is of specific concern.</p>
<ul style="list-style-type: none"> <i>The result is to render the church a mere small object.</i> 	<p>Mere is defined (OED) as: either <i>'having no greater extent range, importance or value than the compared item'</i> or more likely in this situation: <i>'insignificant, ordinary, barely or only what it is said to be'</i>. We take the meaning in this statement to be aligned with <i>'insignificant'</i>.</p> <p>HAA have noted elsewhere in the report that the church building and the towers in particular have a pre-eminent civic place and will terminate the end of the new Parramatta Square and that they are dominant forms in views from Church and Hunter Streets. Those relationships, views and pre-eminence are not changed by the proposal with or without a forecourt.</p> <p>The comment may then relate to what a viewer will experience when standing in the current forecourt looking at the end of the building to the towers (as views from beyond the site have been acknowledged elsewhere in the report).</p> <p>It is difficult to understand how the Cathedral, that forms the centre of the space and which has an axial siting with a setting around it, will be seen by a pedestrian or visitor as a <i>'mere small object'</i>.</p>

	<p>The comment however arises from the treatment of the ground plane and not from the scale of the buildings. It would be reasonable for the author to look to manage the ground plane in a different way perhaps by the use of materials, alignments, levels or the introduction of elements that do create the definition that the author may be seeking. This can all be easily addressed in the Planning Proposal.</p> <p>Given that HAA does not see height as an issue (in the new development) but does comment later on shading and wind which are in part related to height there appears to be confusion about what the author's issue at the western end of the site is.</p>
<ul style="list-style-type: none"> <i>In other words, the church building is a cup on a tray. In scheme 1 the hall is placed on the same tray, which provides some relatable scale, however this is no real difference, and the historic buildings should not have their context removed in this abstract way.</i> 	<p>This rather odd analogy provides some assistance in understanding the basis of the criticism. It appears to arise from wanting to retain a different and possibly separated (not stated) setting for the church that does not relate to new development or the works taking place around the site more generally. This is also reinforced by other comments in the review about recovering the Gunther period setting as modified in the 1950s. This in itself is confusing and contradictory as the earlier setting was enclosed and the 50s setting was open.</p> <p>The only period in which the analogy makes sense is the very early form of the church within a fenced enclosure without any immediate elements or landscape around it. Then the church could, at a stretch, be seen as a 'cup on a saucer or possibly on a dinner plate'. Since the first ancillary developments that relationship of building to site has been altered.</p> <p>There is some merit in considering the western space in more detail and that would be a reasonable comment arising from the review.</p> <p>A key issue is that the analogy dismisses the St John's Hall as having almost <u>no value</u> in terms of the setting of the church. It is assessed as having no more value than providing 'some relatable scale'. The author is clearly saying that the St John's Hall makes almost no contribution to the setting of the church. While noting that the church hall has some local significance, it is agreed that the building diminishes the concept of the churchyard as it is located across the original yard boundary and removes the open and spacious setting that was intended to surround the church building. This is a view that has informed the Planning Proposal and which has led to the three options related to that building being set out.</p>

	<p>The statement then refers to the historic buildings in plural which presumably includes the St John's Hall, residence/Warden's Cottage (not otherwise noted in the review) and possibly the St John's (office) Building (this is also not defined or discussed in the review). It comments that the proposal removes the setting in an 'abstract way'. This is not explained or defined and is quite difficult to understand. It does not arise in the Planning Proposal and is not supported by any material in the review.</p> <p>We conclude that HAA are advocating for no change to the whole church site except possibly reinstating some of the Gunther period paths and setting, possibly (but not actually stated) re-introducing boundary fencing and removing trees and the 'clutter' of Centenary Square</p>
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Overall the HAA Report is of the view that the square is not appropriate, new development is not appropriate, the St John's Hall is inconsequential in terms of the setting, the western court should have tree plantings and treated more as a park and the low scale setting of the area (beyond the site should be retained).

We reject that assessment and suggest there is no basis in the report to make those recommendations or conclusions.

3.2 St John's Hall

HAA note St John's Hall is heritage listed (but do not reference the level of listing) and reject the assessment of significance set out in the draft CMP for the building.

The review suffers from a lack of research and analysis. If the author believes the draft CMP is in error, they are able to say that and to suggest additional work. The views set out in the review are not supported by evidence and as a result the several paragraphs dismissing the draft CMP have no credibility and should not be included in such a report.

The table below looks at each of the statements made:

Statement	Comment
<ul style="list-style-type: none"> The first reason put forward for the removal of the hall is based on an erroneous assessment that it is of representative value, being criteria (g) in NSW State Heritage Assessment Criteria) This means it represents to a better or lesser extent a class of buildings. 	<p>The assessment is not erroneous and the application of criterion (g) is sound.</p> <p>The hall is of representative value. It is difficult to understand why HAA would argue that it is not. It is not sound heritage practice and it is factually incorrect.</p> <p>The building is representative of a broad group of church related buildings, being church halls, that are found on most church sites. Whatever other values it may or may not have under other criteria, it has been heritage listed for its representative value.</p> <p>Church halls fall into a range of sizes and forms and have been built at almost every stage of church history from early</p>

	<p>development to the present day. They serve a range of functions from providing a hall to meet within, toilets, kitchen, meeting rooms, offices and in some situations a range of related functions that are specific to a particular place. They are small and large, simple and elaborate, of almost every historic architectural style and built of a large range of materials.</p> <p>This hall forms part of that broad representative group of places.</p> <p>It may also be considered to have other attributes under other areas of significance, but to conclude it is not representative is incorrect.</p> <p>HAA has provided an untested and unresearched opinion on representative value that cannot be relied upon.</p>
<ul style="list-style-type: none"> The 1910 Memorial Church Hall was a definite part of the planned development of the parish and its eminence as a centre of the arch-deanery under the long incumbency of Archdeacon Gunther (1865-1909). 	<p>The hall was part of the development of the site, that is self-evident. Whether the development was planned in terms of being part of a larger plan for the site is not known. All developments are 'planned' and this is not a reason for significance.</p> <p>The idea that the parish was eminent and that the hall was a special part of that eminence is difficult to ascertain and not established.</p> <p>The original church hall was demolished to make way for a larger hall, one of the Planning Proposal options reflects that history, by allowing consideration of removing the current hall to replace it with a larger hall.</p> <p>Many church halls are memorial buildings (as are a number of churches). It was a common way to raise funds for their construction, but this is not related to the Gunther period which the hall postdates.</p> <p>The building is a heritage item and does represent the growth of the parish. All of the buildings constructed demonstrate growth whether they are significant or not.</p>
<ul style="list-style-type: none"> In this period the church building was rebuilt, the grounds landscaped and replanted, a verger's house erected in the garden church yard and the temporary hall planned to be replaced with this hall building. 	<p>This is largely correct. These works did take place. The first hall was not necessarily a temporary building, it was the first church hall. It was in itself typical of many early simple church halls and it was actually retained and moved to allow for the construction of the new hall that was larger and had greater facilities. Retaining the earlier hall is also interesting in that the church clearly needed the additional accommodation and were not able to accommodate it in a new building, probably due to funding issues. Later that building was demolished to provide for another section of the hall to be built. There is a</p>

	clear pattern of buildings being built, demolished and rebuilt to serve changing needs.
<ul style="list-style-type: none"> In addition, in this period the parish set up a trust to see to the endowment of the parish and went on to acquire the lands along Macquarie Street. 	This is true but is not relevant to the significance or otherwise of the hall. That fund was not related to St John 's Church Hall but it does demonstrate an ongoing pattern of historical development that saw buildings (apart from the Cathedral) as elements to be used, replaced or redeveloped to suit the needs of the church.
<ul style="list-style-type: none"> Clearly, the hall has an important status in the history of the ministry of the parish, and its site 	<p>This statement is misleading and draws incorrect conclusions from the material above.</p> <p>All of the facilities on site have had a role in relation to the ministry of the church, that is why they were built. The author would be aware that the Anglican Church in Sydney, as a general rule, places little value on its buildings as it sees them as functional to achieve the ministry of the church. Buildings rarely have status in Anglican churches with the exception of a small group of parishes where liturgy and sacred space is important. Consequently, while the hall has been a functional part of the parish the assessment as having important status in the history of the ministry of the parish is not a given.</p> <p>The statement also adds 'and its site' as an afterthought. This is a separate consideration and is not explained.</p>
<ul style="list-style-type: none"> Architecturally, the hall is no ordinary church hall either. Most church halls are a single space, of large or small size. This hall is not only large in size, it has a full aisle, a cast iron arcade, and a clerestory. It is in fact conceived like a large church. For this attribute it cannot be said to be representative of most church halls, with their simpler order. 	This is not correct. There is an extraordinary variety in church hall buildings. This building is quite substantial and does use a clerestory form, there are a range of variations on this type of building across church sites and there is nothing to suggest that this building is an exemplar of the form or is exceptional in any way.
<ul style="list-style-type: none"> Its siting with respect to the main church building is not representative. Church halls are often placed to the rear of a church building, and sometimes in a side street. St John's Hall is prominently placed with its entry adjacent to the north part of the church grounds, and its entry paths integrated into the landscape of this most prominent part of the grounds, the path that connected its two entrances, that from St John's Park and from Hunter Street. 	<p>This is not correct. The statement demonstrates a lack of understanding of how the church and the churchyard were laid out and functioned in what is a quite unusual church setting. The hall was located on the only available land in close proximity to the church, it is pushed back into the corner of the site to minimise its visual impact on the church. It is oriented east from its front door where the church door is west, with side entries but it is opposite to the main entry which is not usual.</p> <p>With the urbanising of the site, the hall took on a different relationship to the broader site.</p>

	<p>Later attempts to modify and screen the building, while not successful, attempted to create a better relationship between hall and church than had existed.</p> <p>None of this supports the idea of the building being sited with intent.</p>
<ul style="list-style-type: none"> In light of this, its significance is a rare example of a large church hall conceived as part of a landscape of a major church building. It is also a major building in Parramatta, and worthy of listing as a local item notwithstanding its relation to other church halls in other Local Government Areas. 	<p>This is not correct. There is no evidence provided or referenced to suggest this.</p> <p>It is not a major building within Parramatta. It is quite consistent with the scale of many buildings in the city at that time.</p>
<ul style="list-style-type: none"> The second argument for its removal is that it is necessary for the greater good. In short, that a new and better setting for the cathedral is preferred. This overlooks the evidence that the church has a historic setting. Of more concern, it creates a precedence for the removal of any heritage item, if an option, which is considered better, is proposed instead. 	<p>This is not correct. The Planning Proposal considers options that include removing the building. Its heritage status is acknowledged in that process.</p> <p>A different and potentially better overall setting for the cathedral may be created by its removal but this also relates to recovering the sense of the original churchyard.</p> <p>While the setting of the church retains elements of its historic form, there is no 'historic setting' that can be defined. There is no evidence or support for any of these statements.</p> <p>The matter of precedence, which is cited as the most important issue, is not relevant. Every proposal for any heritage site or element has to be considered on its merit.</p> <p>There is no prohibition on demolition or adaption or change, they are all possible outcomes under the Planning Scheme provisions.</p>

4 Answers to Questions posed by Council

The questions are briefly answered with reference to the earlier discussions. The review does not support removal or adaptation and makes little comment on retention.