

23 July 2020

Ellen Robertshaw
DFP Planning Pty Ltd
erobertshaw@dfpplanning.com.au

197 CHURCH STREET, PARRAMATTA

COVER LETTER FOR PLANNING PROPOSAL

1. Preamble & Background

This letter has been prepared on behalf of Holdmark Property Group to assess the impact of the revised design – proposed drawings by Turner dated 16 October 2019 and sent to Heritage 21 on 09 July 2020 – for a Planning Proposal at 197 Church Street, Parramatta (the site), on the heritage significance of the subject site, the locality and heritage items in the vicinity. We support the amended design on the basis of this letter.

The subject site is located at 197 Church Street, Parramatta, on the western corner of the intersection of Macquarie and Church Streets, with a section of its north-western boundary abutting Marsden Street. The site also anchors the north-western corner of Centenary Square/Parramatta Square. Further, it is listed as an item of environmental heritage in Schedule 5 of the *Parramatta Local Environmental Plan 2011* (PLEP). It is also located within the vicinity of heritage items listed under Schedule 5 of the PLEP, as well as in the NSW State Heritage Register under the *NSW Heritage Act 1977*.

In September 2015, Heritage 21 prepared a Fabric Analysis for the heritage-listed site. In addition, in March 2015, Heritage 21 prepared a Statement of Heritage Impact ('HIS') for the Planning Proposal. The proposal included the following works:

- Demolition of the former Murray Brothers Building at the corner of Church Street and Macquarie Street. Three options were provided: (a) complete demolition (b) carefully dismantling sections of the Church and Macquarie Street facades of the building and re-using them in the new development (c) retention of the Church and Macquarie Street facades in situ;
- Demolition of the non-heritage building at 207-209 Church Street and the non-heritage building at 89 Marsden Street (rear of 197 Church Street);
- Construction of a residential/commercial tower including underground car parks;
- Archaeological investigation of those sections of the site deemed to have archaeological potential following professional assessment. Two options were provided: (a) significant remains are found (b) no significant remains are found. Depending on whether significant remains are found, and the advice from Heritage NSW (formerly Office of Environment & Heritage) as to their required options for treatment included commercial space on the ground floor and/or public space including a heritage/archaeological interpretive aspect.

2. Nature of this Cover Letter

The objectives and controls of the *Parramatta Local Environmental Plan 2011* (PLEP) and the *Parramatta Development Control Plan 2011* (PDCP) are the pertinent planning controls for the development. This letter does not purport to determine or assess any BCA requirements, services related issue, contamination issue, structural integrity issue, or any other non-heritage issue. It is beyond the scope of this letter to address indigenous associations with the subject site or to locate or assess potential or known archaeological sub-surface deposits on the site or elsewhere.

3. Proposed Changes to Proposal

It is our understanding from the Drawings referred to in Section 1 above that the proposal has been amended to include:

- Retention of the Macquarie and Church Street facades of the former Murray Brothers building and their integration into the proposed design;
- Construction of a mixed-use development consisting of a hotel tower and commercial office tower above a two-storey podium. The podium level would consist of lobbies, retail, hotel dining and function spaces, with a retail supermarket space within the basement and an area for retail/hotel loading, servicing and back of house area.
- Changes to the form of the towers, including stepping down the upper levels towards the Macquarie Street elevation, the incorporation of scaling datum lines to give scale to the facades, as well as curved corners to soften the tower forms. We understand that the tower elements have also been designed to maintain solar access to Parramatta Square.

4. Heritage Impact Assessment

Heritage 21 has assessed the drawings referred to in Section 1 above and has compared these drawings with the original drawings submitted for the Planning Proposal. Taking into account the PLEP, the PDCP and best practice heritage management, it is our opinion that the amended design (refer to Figure 1 below) has resulted in improved outcomes for the subject site, the locality, the Macquarie and Church Streets streetscapes and heritage items in the vicinity for the following reasons below:

- A key element of the amended design is the retention of the Church and Macquarie Street facades of the heritage-listed site and their integration into the design (refer to Figure 1). From a heritage perspective, this would be considered an appropriate treatment. The retention of these facades is in our opinion, the best method of preserving a significant portion of the building's significant fabric and of its contribution to the character of the streetscapes, junction and city. Further, it would be seen as an opportunity to integrate the heritage item into a new development in a meaningful way, ensuring its conservation, as well as its re-use/repurposing. The

retention of the Macquarie and Church Street facades of the Murray Brothers Building, and the retail use of the first two-storeys of the new development would ensure public interaction and ongoing use of the site and would be compatible with the significance of the item. It would also respect the character of the locality. Further, the retention of the significant facades would also preserve the relationship of the site to other buildings including the Murray's Building at 188 Church Street.

- The integration of the Church and Macquarie Street facades of the former Murray Brothers Building into the design, and the location of the new towers above a podium level would ensure the retention of the double storey scale of the site at pedestrian level. The retention of the significant facades would also ensure the retention of some scale between the site and heritage items in the vicinity, as the two-storey scale would be the main street view on Church and Macquarie Streets.
- The amendment to include a podium level would allow the sympathetic introduction of a contemporary development, with a separation between old and new. The junction at the base of the towers would create a transition between these elements and would be considered a sympathetic response to the heritage façades below, breaking up the bulk of the towers above. Additionally, this would allow change to the item, while conserving the significant fabric of the site below. It is our assessment that changes made to this heritage item are based on an understanding of the heritage significance of the item, while achieving a reasonable balance between contemporary expectations and protecting heritage significance. In our view, a clearly contemporary building juxtaposed with the existing and original legible facades would be in accordance with Article 22.2 of the *Burra Charter*. Further, the proposal for a tall 'iconic' building above the retained heritage facades would restore a landmark to this significant and deserving location.
- The proposed form of the new development has also been refined and articulated, to ensure that it would reduce its perceived bulk and scale. The development has been broken up into a base, with two towers above, with the towers appropriately set back from all boundaries. The upper levels of the towers would step down, while the towers would include curved corners to soften the forms and scaling datum lines would be added, to give scale to the facades. Such measures would in our opinion mitigate the impact that the towers may have and provide a sense of scale. Further, the positioning of the towers, diagonally from each other would also reduce their prominence from key view points within the Macquarie and Church Street streetscapes, as well as from the Parramatta/Centenary Square view line.
- The proposal would respect the heritage significance of heritage items in the vicinity by not obstructing significant views to or from them or impacting on their fabric in any way. While the building would be visible as a backdrop from many heritage items, much of the bulk of the new development would not in our view, be read as part of the heritage items' setting, and would be readily identifiable as contemporary as required by Article 22.2 of the *Burra Charter*. The proposal's height in particular effectively removes much of the building's bulk from the setting of the heritage items

in the vicinity. In addition, as discussed above, the development and the form of the towers has been modified to reduce the impact of the development and soften any visual impact it may have.

5. Recommendations

The Fabric Analysis prepared by Heritage 21 in September 2015 identified an awning above the ground level of the Macquarie and Church Street facades. The awning is of a metal fascia construction with pressed metal undersides and a metal sheet roofing. Although the awning has undergone some modifications, it is classified to be of high significance as it retains a similar form and function to the original facades. Thus, in our view, the awning should be retained as part of the proposal.

6. Conclusion

Taking into consideration the amendments to the design outlined above in Section 3, it is our opinion that the new amended proposal – integrating the Macquarie and Church Street facades within the design – compared to the previous design would be a better heritage outcome for the subject site, heritage items in the vicinity and the locality. Heritage 21 is confident that the amended design complies with pertinent heritage controls and would have a neutral impact on the heritage significance of the subject site, the Macquarie and Church Street facades, and heritage items in the vicinity.

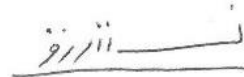
Further, as discussed in Section 5.0 above, we recommend that the pressed metal awning of the Church and Macquarie Street elevations be retained as part of the proposal and also integrated into the design.

Yours sincerely,



**Paul Rappoport – Heritage Architect
Director**

B. Arch., AIA, MURP, M. ICOMOS, IHBC
Registered Architect No. 5741 - NSW Architects
Registration Board
Master of Urban & Regional Planning (Hons) - MURP
Member of Society of Architectural Historians -
SAHANZ
Member of Australia ICOMOS – M. Australia ICOMOS
Member of The Institute of Historic Building &
Conservation - IHBC
Member of International Planning History Society –
IPHS
Member of The Twentieth Century Heritage Society of
NSW Inc.



**Nastaran Forouzesh
Heritage Consultant & Team Leader**

B. Architecture, M. Archaeology, Grad. Dip.
Museum & Heritage Studies

APPENDIX I – 3D View



Figure 1. 3D View of the new design (Source: Turner, 197 Church Street St Parramatta Urban Design Report, October 2019).