

LATE CORRO	Item: <u>DI</u>	44
Meeting:	<u>WLPP</u>	
Date:	<u>13/12/2022</u>	

1/12/22  
9 Reina St  
Nth Bondi  
2026.

Dear Shona,

I am writing to thank you, on behalf of our Committee of Management at St Andrew's Scots Presbyterian Church, for your letter informing us of the proposed heritage listing of the church.

Firstly, I would like to apologise that we are very late in our response because we are sadly without a minister at the moment and things are in a little bit of confusion. We only discussed your letter on Tuesday night and of course now realise that the 28<sup>th</sup> October has well and truly gone.

I think the only things we really

thought might be important from our point of view, as parishioners, are

1) the large fig tree that is currently 'invading' the Church. It is starting to lift the path, and the branches are growing closer and closer to the walls and stained glass windows of the Church.

2) we would very much like to consider building some form of disabled access into the Church. We have an ageing congregation, and some people with a disability ~~and~~ <sup>find</sup> climbing up and down the steps is very difficult.

Are you able to offer us any assurances that we can trim or remove the damaging fig tree, and that we will be permitted to fit disabled access onto the building?

I am the Secretary of the



committee and would be very happy  
to receive your reply/thoughts  
on these issues, before our next  
meeting on the 15<sup>th</sup> January.

Thankyou so much for letting  
us know that the Council values  
the historical and social significance  
of our church.

yours sincerely,

Jilly Morrison

c/- St Andrew's Scots Presbyterian Church

2 Carlisle St

Rose Bay 2029.

Electronic

LATE CORRO	Item: <u>01</u>	47
<u>WLPP</u>		
Meeting: <u>13 12 2022</u>		
Date: <u>1/1/2023</u>		

Sue O'Connor

Subject:

FW: Submission regarding Heritage Study: Places of Worship, Woollahra LGA 2022 | St George Greek Orthodox Church

From: St George Church [<mailto:stgeorgerosebay@gmail.com>]

Sent: Sunday, 11 December 2022 9:38 PM

To: Records <[Records@woollahra.nsw.gov.au](mailto:Records@woollahra.nsw.gov.au)>

Cc: Shona Lindsay <[Shona.Lindsay@woollahra.nsw.gov.au](mailto:Shona.Lindsay@woollahra.nsw.gov.au)>

Subject: Submission regarding Heritage Study: Places of Worship, Woollahra LGA 2022 | St George Greek Orthodox Church

Submission regarding Heritage Study: Places of Worship, Woollahra LGA 2022 | St George Greek Orthodox Church

To the members of the Woollahra Local Planning Panel,

Thank you for providing us the opportunity to offer our community's sentiments regarding the Heritage Study that was undertaken this year. The Study included our church building of which I have been the Parish Priest for the last 16 years, the longest current serving minister of religion in the area.

On behalf of our community and with one voice with the Board of Directors, the elected members of our community, I submit that we respectfully stand in disagreement with the recommendation of the study that our church be heritage listed.

We are on a growth trajectory and have a vision of developing our church's property to facilitate growth. An existing D.A., approved in 2011 by Woollahra Council itself, precludes the imposition of a heritage listing upon our property.

The heritage study references the Church of St Ioannis at Parramatta to argue for a heritage listing based on rarity. Our view is different. St Ioannis Church was able to sell the building, which was subsequently demolished by a Council approved development and move to a much larger property where the growing needs of the community could be met. They are now thriving. Had a heritage listing been in place, that community would have stagnated and gone extinct. We do not want this to be our fate.

The heritage study officers indicate in their report that they did not enter the building once. I, myself, was not consulted. Had this happened, I would have had the opportunity to demonstrate that the building has had substantial improvements and alterations, through which many original features have been changed.

As a community, our priority is growth. That means tending to and investing in our people. Bricks and mortar are a means to serving that end, not the end in and of itself. We want to be able to move adaptively into the future without hindrance.

Thank you for your time.

Fr Gerasimos Koutsouras  
Parish Priest

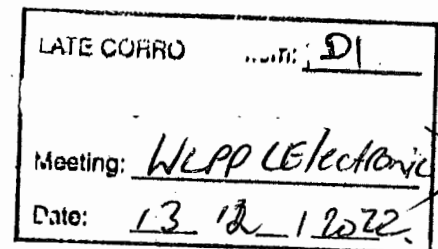


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12 December 2022

Woollahra Local Planning Panel  
 Woollahra Council  
 536 New South Head Road  
 Double Bay NSW 2028

via email: records@woollahra.nsw.gov.au



Dear Panel Members,

#### HERITAGE RESPONSE—Former Vaucluse Uniting Church

Touring the Past Pty Ltd (TTP) was engaged by the property owners of 3 Russell Street, Vaucluse, referred to as the *Former Vaucluse Uniting Church*, to undertake an independent expert peer review of Woollahra Council's proposed listing of the subject place as a local heritage item as part of the *Places of Worship Heritage Study*.

To this end, a *Heritage Assessment* report dated 28 October 2022 was prepared by TTP and submitted to the council.

Briefly, I note that the agenda documentation refers to the TTP *Heritage Assessment* as prepared by a 'representative of the owner' (p17). This categorisation of my involvement is misleading. I am an independent heritage practitioner who the property owner has engaged to undertake an autonomous review of the council's proposal. The report prepared by TTP, as stated in the methodology, was done according to the *Expert Witness Code of Conduct* in Schedule 7 of the Uniform Civil Procedure Rules 2005 (NSW). It articulates my professional opinion on the heritage significance of the subject place, focusing on the assessment provided in the *Places of Worship Heritage Study* and is not an advocacy/representation document. Such a distinction is essential to recognise.

In summary, my position is somewhat aligned with that of the council, although it differs on key points. I concur that the A-frame Church (1960) at the front of the subject place warrants heritage listing;

however, I hold a different view as to the heritage value of its interior and moveable elements. I also disagree with the council's claim that the A-frame Church should be considered aesthetically and socially significant.

The major point of contention between the council and my assessment is the relative significance of the Federation-period church building (1909) at the rear of the subject place. It is my position that this building does not warrant heritage listing.

The council has amended the proposed heritage inventory sheet for the subject place in response to the findings and recommendations of the TTP *Heritage Assessment* report. Such revisions chiefly consist of fixing minor errors and reproducing large sections of the place history and discussion about the A-frame Church typology (without attribution), and the integration of some additional physical analysis from the TTP report. Additional discussion and clarification have also been introduced into the proposed Statement of Significance by the council. Some of the TTP report's recommendations concerning management were also adopted. These revisions have generally augmented the inventory sheeting as a heritage management document.

Nonetheless, differences in expert opinion remain on several fronts, as is typical with heritage significance assessment matters.

The council's contention with the findings and recommendations of the TTP *Heritage Assessment* and my counter-response is outlined in the following table.

**NB.** The council officer's response (central column) has been reproduced without change; however, their summarisation of the TTP Heritage Assessment findings/recommendations, where arbitrary, has been reworked. The order in which the council raised issues has also been revised for clarity.

**TTP Position***Significance of the Rear Church Building*

The TTP report agreed with the council that the 1909 church at the rear of the subject place (referred to as the 'old' church') did not embody aesthetic or representative significance, as ecclesiastical buildings generally do at the local level.

However, the TTP report differed from the council's claim that the 'old' church satisfied the minimum requisite threshold for listing Criterion A (Historical) and Criterion D (social).

It is generally accepted that significance is embodied by extant fabric.

The 'old' church has been irrevocably and substantially modified by the effective removal of its façade, which occurred as part of the A-frame Church's development. The loss of its façade has severely compromised the 'old' church's capacity to be interpreted to its original design and character.

Recognising the impaired integrity and low level of intactness of the 'old' church as a Gothic-style Federation-period ecclesiastical design markedly diminishes the potential to ascribe it with historical significance (or any heritage value/s).

The explanation in the draft heritage inventory sheet for why the 'old' church had historical significance was generally lacking. Resting on an inconclusive and ambiguous attestation that it 'demonstrate[s] the pattern of growth of religious

**Council's Response**

The former 1909 church has significance as part of the overall site and the heritage inventory statement reflects this. To reach the threshold only one criterion has to be met. The former 1901 [1909] church has historical and social significance.

**TTP Response**

The council's assessment has confounded general historical interest, which the 'old' church undoubtedly comprises as a now peculiar and defaced 'back of site' building with historical significance under Criterion A. The bar for meeting the latter at the individual heritage level is high and should be demonstrated compellingly within the local thematic context, not generically.

The crux of the council's position is that the sequence of development at the place is expressed in built form, with an earlier Federation church at the rear and a postwar church at the front. This evolved sequencing is of dubious interpretive/historical value. That such a development, which by any design measure resulted in a poor visual and functional outcome for the place, is also not acknowledged.

In my opinion, the council's slightly revised claim under Criteria A for the 'old' church remains unconvincing. Further, the TTP assessment did not unearth other more provable/demonstrable historically significant attributes. The fact that there are three other far more intact Federation-period places of worship in the municipality and that the presence of the Congregational/Uniting Church in Woollahra will be reflected in the A-frame Church at the subject place, undercut other arguments for ascribing historical or thematic value to the 'old' church.

It remains my view that any building that has had its façade elevation purposefully removed (not modified, but extinguished) would be a weak candidate for heritage listing unless perhaps it was singular or of outstanding significance in another regard. The loss of the 'old' church's most architecturally accomplished elevation should prove decisive for the finding that it is not of sufficient heritage value for listing at the individual level.

and community organisations that were occurring in this part of Sydney at the time'. Such a sweeping declaration is generic and does not withstand scrutiny (refer to TTP report, section 4.4).

Troublingly, from a methodological viewpoint, the council assessment does not undertake a comparative analysis of other Federation-period churches in the municipality (only postwar churches). The TTP report undertook a brief examination of comparators in Woollahra, noting three: one current (*Rose Bay Uniting Church*, 1683, WLEP) and two proposed in the Study at hand (*Paddington Church of Christ* and *St Andrews Scots Presbyterian Church*).

All three of these Federation-period church buildings are substantively more intact than the 'old' church at the subject place and, as such, far more architecturally distinguished.

Council, in this case, has failed to demonstrate that the 'old' church building is of social significance (refer to TTP report, section 4.4).

The TTP report acknowledged that 'some fine architectural elements' were retained at the 'old' church. Specifically, its coloured glazing, copper belle-cote, leadlighting/coloured glazing, and Pixie O'Harris murals.

Whilst it is noted that the submission is recommending that the 'old' church building is not included as part of the listing, contradictory information contained in the submission highlights that it contains elements of significance. Accordingly, Council staff retain the recommendation that the local heritage listing includes the 'old' 1909 church.

It is also noted that both side brick volumes at the 'old' church are non-original.

Under the *Assessing Heritage Significance* (2001) guidelines, grounds for exclusion include major alterations. It is not at question that the 'old' church building has experienced extensive change.

As examined further below, the attribution of social significance to the 'old' church remains flawed and erroneous.

The comment from the council that 'only one criterion has to be met' is concerning as it suggests a scattergun approach to significance assessment. In my opinion, the broader, more salient question is whether or not the 'old' church should be managed as a significant building from a heritage perspective into perpetuity, given that its original presentation to the public realm of Woollahra has been spoiled and there are better local examples existing that convey the same or similar historical themes (Federation religious design, Congregation/Uniting Church development/presence).

The TTP report is not contradictory in my mind.

The council's officer has not understood the key point advanced in relation to the significance of the 'old' church.

Namely, that while some architectural elements of note survive on the roof, side elevations, and internally, these attributes do not discount the building having been fundamentally altered.

An element can be of architectural interest or attractive without being of heritage significance.



**TTP Position****Council's Response****TTP Response**

In regard to the Pixie O'Harris murals, which are much discussed in the council assessment, it remains my view that:

As the Inventory Sheet acknowledges that the 'old' church building would not meet the threshold for listings under aesthetic or representative significance due to its compromised exterior, it is unbalanced to then suggest—through discussion in the description of the Inventory Sheet—that aspects of its interior are nonetheless significant. (pp30-31)

**Significance of the A-Frame Church**

The TPP report found the postwar A-Frame Church has significance under criterion A (historical), criterion F (rarity), and criterion G (representativeness).

It differed from the council's assessment that the A-Frame Church was also of significance under criterion C (aesthetic) or criterion D (social).

The Heritage Study used the Heritage Manual criteria and found that the church meets both the aesthetic and social significance criteria as summarised below:

**Aesthetic significance:**  
The A-frame church building is a restrained late twentieth century ecclesiastical building. The building has been subject to few alterations and additions since its construction. A-frame churches were designed and built for their striking spatial qualities, and the building is considered to be aesthetically distinctive.

**Social significance:**  
Although social significance was not formally studied for this

There is agreement between the parties that the A-frame Church is significant at the local level and highly intact.

Accepting that, the contentions here are not substantial and are advanced chiefly by TTP on the grounds of accuracy.

Fundamentally, it is not good heritage assessment practice to ascribe *both* aesthetic and representative significance to the same building.

It is illogical, in my opinion.

A building should either be considered aesthetically distinctive/distinguished/out of the ordinary or be perceived as a good and indicative example of its typology.

The assessment of the TTP report on this front stand:

It is accepted that no weight should be given to the design of the A-frame church by the practice Booker & Wilson. Other than being an active firm in NSW during the postwar period, no evidence has emerged to substantiate this firm as noteworthy, celebrated, innovative, etc. The involvement of

**TTP Position****Council's Response**

assessment, it is noted Vauluse Uniting Church likely has social significance as a centre of worship for the local community for more than a century. The Vauluse Uniting Church is a place of community memory. The A-frame church building on the site contains memorials and plaques to commemorate individuals associated with the church over time.

Notwithstanding, to qualify for local heritage listing in accordance with the guidelines, the building is only required to meet one of the criteria.

**TTP Response**

professional architects at the A-frame church has resulted in a good, functional design that conforms with the principal characteristics of the typology. All points that would be a better fit under criterion G.

The A-frame church is professed to have aesthetic significance by virtue of its 'striking spatial qualities' under discussion for criterion C; however, there is no elucidation of this criterion in the Statement of Significance, which emphasises the building's representative value—a point agreed with by this report (see below).

In the opinion of this report, the A-frame Church does not embody aesthetic significance. Its spatial qualities, while eye-catching as intended by the typology, are exceedingly typical for its type, particularly by 1960, and stem entirely from the architect's rendition of a well-established postwar modernist design form. This is not an example of the A-frame church at its postwar finest. The design language is conventional for the type. (p28)

The issue of social significance is examined below.

**Social Significance**

The subject place is not socially significant under criterion D. As above.

Neither the 'old' church building nor the A-frame Church should be attributed with social significance.

The council admits that no quantitative or qualitative efforts to measure potential social significance were engaged as part of the Study. Such a failure to seek to move beyond the speculative assignment of social significance to a church building/s may have been understandable several years back



## TTP Position

## Council's Response

## TTP Response

when the concept of social significance was being advanced, but it is now—in my view—undefensible.

At the core of detailing social significance is defining a community. Council determines the group to be the 'local community'. Such a grouping is far too nebulous and variegated to be accepted. For instance, it imaginably includes those whose personal beliefs diverge widely from those of the Congregational/Uniting Church.

Crucially, the council assessment has also fundamentally misconstrued the nature of social significance, which is a 'living' form of heritage value.

For example, this could likely be demonstrated by the parishioners of a church through their regular interactions with the place over a long period.

The above situation is not viable for the subject place as the congregation has dispersed and neither church building is being (or projected to be) utilised for the original use.

What the council are describing under criterion D is a historic community connection—not an enduring/ongoing link with a definable community group. Such claims would be a better fit for the A-frame Church under criterion A.

Again, the compromised intactness/integrity of the 'old' church diminishes its capacity to be attributed with historical significance as a former site of worship should the council follow my recommendation.

It remains my recommendation that neither church building at the subject place should be considered socially significant under criterion D.

**TTP Position****Council's Response****TTP Response***Internal Controls—A-frame Church*

No assessment (as opposed to a description) was provided in the Draft Heritage Inventory for why the layout of the A-frame Church and original internal elements were considered significant. Other than an inference that if a component was original, it was—without explanation—of heritage value.

The TPP *Heritage Assessment* found that some internal elements at the A-frame Church were significant on the grounds of their aesthetic distinctiveness and importance to the interpretability and intactness/integrity of the subject place, namely:

- Vestibule,
- Laminated timber beams and ceiling (nave),
- Central uninterrupted and soaring volume of the nave,
- All embedded plaques/memorials, and
- The attached metal crucifix (altar).

The TPP report recommended that these specific internal elements be noted as significant in the Statement of Significance and inventory sheet. Being explicit about what aspects of the interior require consideration from a heritage perspective provides far greater management clarity than 'blanket' coverage—both for the property owner and consent authority.

Including all interiors allows the protection of the entire interior of the church which is deemed to be significant as per Council's heritage study. This is an appropriate and robust approach to heritage conservation in accordance with the Burra Charter.

The *Burra Charter* encourages the adoption of an informed approach to heritage management. At its essence, it advocates for understanding the significance of a place and its various attributes. Such a comprehension of heritage value/s should then influence proposals for change.

Accepting that, only the significant elements of the A-frame Church's interior require management on heritage grounds.

The council's revised inventory sheet sheds no further light onto why the interior of the A-frame Church, in its entirety, is of paramount importance to the significance of the place.

NSW local councils have, over the past few years, increasingly sought to extend the reach of heritage management within the interior of heritage places. Such a shift in practice is not unwelcome.

However, the tendency has been to generically 'list' all aspects of the original interior without exercising discretion or undertaking a rigorous heritage assessment. Such an approach is unsystematic and burdensome in the context of planning for and the assessment of future change.

It is generally accepted that original fabric does not in itself spontaneously equate with cultural significance. An assessment has to be made and an evidenced case made.

The 'blanket' listing approach is also not the only available for the consent authority. The government practice note in Victoria, for instance, in regard to applying internal controls at the local level, states:



**TTP Position****Council's Response****TTP Response**

This provision should be applied sparingly and on a selective basis to special interiors of high significance. The statement of significance for the heritage place should explain what is significant about the interior and why it is important.<sup>1</sup>

The TTP finding is in line with this approach. Only elements of demonstrated significance in the interior of the A-frame Church require heritage management. These more notable elements should be clearly outlined in the Statement of Significance and inventory sheet.

**Extent of the Heritage Listing**

The TTP report recommended that:

Optimally, the extent of the heritage listing would only be applied to the footprint of the A-frame Church and the frontage of the subject property, excluding the rear half of the place, which contains the flat-roofed link and 'old' modified church... In lieu of the above option, it is recommended that should the subject place be listed, its item name be altered to reflect what about the site is of significance; i.e. the Former Vaucluse Uniting A-frame Church, including specific internal elements. This name, in combination with the proposed Statement of Significance, would better reflect what the significant elements at the subject place, yielding better management clarity for the property owner and consent authority.

It is agreed that the flat-roofed link is not significant. However, the former 1901 [1909] church was found to reach the threshold for heritage significance as per the Heritage Study.

Heritage Management Documents would provide further guidance on the management of all the buildings with significance on the site.

For the reasons discussed above, it is the findings of the TTP report that 'old' church building (1909) is not of sufficient historical significance to warrant its heritage listing nor patently of any social heritage value.

It is recommended that the Statement of Significance and the inventory sheet be revised accordingly to reflect this position.

It would be desirable then to exclude the rear 'old' church, effectively the back half of the subject place, from the extent of the heritage curtilage for the A-frame Church, which is deserving.

If that is not possible for mapping reasons, then it is imperative to amend the inventory sheet accordingly to reflect what is and what is not significant.

<sup>1</sup> Victoria Government Environment, Land, Water and Planning, *Applying the Heritage Overlay: Planning Practice Note 1*, August 2018, p4, available online

**TTP Position**

The TTP report noted that should the WLPP disagree with its findings and decide to include the 'old' church building as a significant part of the subject place; then it should be acknowledged in the inventory sheet that this heavily modified building is of less significance.

**Council's Response**

*As above.*

**TTP Response**

This TTP recommendation deserves further elaboration.

It is my view that should the WLPP disagree with my findings that the 'old' church building is not significant, then the council's proposed Statement of Significance and inventory sheet should be revised to reflect better what fabric and/or attributes of the modified building are significant. Not just physically extant but significant under the claimed criteria.

**Moveable Heritage Items**

The TTP report recommends that references to moveable heritage items be deleted from the Statement of Significance and the inventory sheet.

No explanation for why moveable elements identified by the council at the A-frame Church are significant has been offered other than that they may be original.

None of the moveable items at the A-frame Church are significant in my view—i.e., the overall heritage value of this former place of worship would not be adversely impacted should some of its furnishings depart.

The preparation of a moveable heritage inventory, as proposed in the management recommendations of the heritage inventory, is burdensome on the owner and, in the absence of persuasive reasoning why, presents as unnecessary.

*Not responded to by the council.*

The assessment/recommendations of the TTP report stand.

It is noted that the council has included information about the organ located in the upper galley in the inventory sheet without providing an indication of its significance.

As noted in the TTP report, this organ was relocated in 1933 and is not intact. It is my opinion that the organ is not significant. The inventory sheet should be revised to make this clear or explicitly discuss what about the organ is considered to be significant.

Measures undertaken to recognise and protect places of cultural heritage value in Woollahra are to be encouraged, as the conservation of important sites is integral for a community's sense of continuity and ability to interpret its multilayered evolution and distinctiveness. However, such measures should be based on *demonstrated* significance, which is only ascertainable from a rigorous analysis of a place from a heritage perspective. In the absence of this, the council runs the risk of adding places of little apparent significance and, counterproductive to the legitimate intent, diminish the value of heritage items in the eyes of the community.

The A-frame Church and some of its internal elements are of demonstrated heritage significance. The 'old' church at the rear of the subject place is not and should not be heritage listed. Despite the minor amendments to the council's proposed Statement of Significance, the version I prepared in the TTP report remains, in my view, a more accurate and actionable articulation of significance at the subject place. I recommend that the WLPP consider its adoption or encourage the council to consult with TTP to develop a mutually agreed-upon Statement of Significance.

The Former Vacluse Uniting A-frame Church, constructed in 1960, is of historical and representative significance. The building was designed by the architectural practice Booker & Wilson, who adopted the then tried-and-true postwar A-frame form. Elements of particular significance are its steeply-pitched triangular form, concrete roof tiles, salmon brick walls, original openings, including unpainted aluminium frames and frosted/coloured glazing, façade composition, and rendered entrance porch with original doors and terrazzo threshold. The significant internal elements are the vestibule, laminated timber beams and ceiling treatment in the nave (battened textured sheeting), along with its central uninterrupted and soaring volume and large attached metal crucifix, the upper gallery, and all embedded/affixed plaques and memorials. The front garden retaining walls/fence and central path are original and complementary to the A-frame Church.

The Former Vacluse A-frame Church is historically significant as an illustration of postwar church-building activity in the municipality by the Congregationalists, later the Uniting Church (from 1977), who had worshipped at the place since 1909.

The A-frame Church is of representative significance as an intact and substantial masonry example of its typology, which surged in international popularity over the 1950s as a cost-effective and flexible solution for postwar ecclesiastical design. Its bold triangular geometry and pared-back character are evocative of modernist architecture. While more traditional symbolic allusions to church design, like the building's verticality, simplified metal crucifixes, and entrance porch, are well-integrated and impart a sense of repose and reverence. It is the singular example of its type in the municipality.

Some internal elements, as specified, are architecturally notable and contribute to the intactness and interpretability of the former worship space as well as the church's original design.

*[Either provide in Statement of Significance or include in the Heritage Inventory Sheet]*

The modified late Federation Gothic-style church (1909) at the rear of the property, which initially accommodated the Congregationalist, has been severely modified and is not significant. The flat-roofed link between the A-frame and rear churches is also not significant.

Please do not hesitate to contact the undersigned if you have any questions on this matter.

Yours faithfully,

*Patrick Wilson*

PATRICK WILSON  
 Director  
 Touring the Past Pty Ltd  
 B.A (Hist Hons), M. Cult Heritage  
 ICOMOS, Pro Hist PHA (NSW & ACT + VIC),  
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**churches  
of Christ**  
in NSW & ACT



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12 December 2022

Woollahra Municipal Council  
C/- Anne White  
Manager – Strategic Planning and Place  
P.O. Box 61  
Double Bay NSW 1360

LATE CORRO	Item: <u>D1</u>
Previously forwarded to Cirs	Y / N
Meeting:	<u>WLPP (Publ. c)</u>
Date:	<u>13 / 12 / 22</u>

Dear Madam

CC: Shona Lindsay – Senior Heritage Officer ([shona.lindsay@woollahra.nsw.gov.au](mailto:shona.lindsay@woollahra.nsw.gov.au))

**Submission for Paddington Church of Christ, including interiors and moveable heritage at 116-122 Paddington Street, Paddington (Lot 20, 21 & 22, Sec 1, DP 180) about Planning Proposal - Places of Public Worship - Heritage Study**

This letter is provided to Woollahra Council (Council) to support the submission for the proposed Planning Proposal concerning Paddington Church of Christ, including interiors and moveable heritage at 116-122 Paddington Street, Paddington formally known as Lots 20, 21 & 22, Sec 1, DP180 (Site). We represent the landowners of the Site as Churches of Christ in NSW and ACT (CofC).

We are in receipt of the 15 September 2022 Council letter notifying CofC of the proposed heritage listing. In response to the heritage listing proposed in the letter and the various claims and assertions contained within, CofC has commissioned GBA Heritage to undertake an independent review and assessment of the Site's heritage values, as well as confirm operational status, condition of building and develop suitable responses and corrections to the 15 September 2022 Council letter. The GBA submission was issued to Council on the 8th of November 2022. In addition, Napier Blakeley (engineers/building consultants/surveyors) have been engaged to undertake independent review and assessment of the building's status and condition.

The above reports' findings are highlighted below.

- The subject site does demonstrate elements of historical, social, and aesthetic significance at a local level, in addition to representative values
- The site was in continued use until c.2016 and was well known within the community for its kindergarten, which operated for approximately 67 years. However, the level of associative significance does not extend beyond any buildings that have provided local





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of Christ**  
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services for an extended period of time which have ceased use and are no longer open to the public.

- Although there are items formerly associated with the use of the Church building for religious services, these are not particularly fine examples of their type, nor do they extend our understanding of the services beyond that which is already known and likely date from the mid to late 20th Century rather than the date of construction. Further, these items do not contribute to the significance of the site itself which is demonstrated in the external structure of the building, typically associated with Church design and structures.
- Although the moveable heritage collection items demonstrate the historical uses of the subject building, these are not rare elements and are not necessarily integral in understanding the previous historical use of the building, particularly due to the external presentation to the public domain and internal features, including the stained-glass windows and timber lined ceiling and trusses. These external elements are consistent with Churches constructed during a similar period
- Internal timber elements, such as the timber panelling and storage structures, were likely introduced c.1970s and do not contribute to the significance of the site.
- The listing should acknowledge moveable heritage within the site and suggest retention and re-use be encouraged where possible, particularly for interpretive purposes. However, the moveable heritage is not integral to the significance of the site and is not a fine example of its type, particularly as they likely date mid to late 20th Century. Incorporating the moveable heritage within the listing itself will likely curtail the potential future adaptive re-use of the site which will be necessary due to the deteriorating condition as caused by the vacancy of the site.
- The ground floor of the main Paddington Church of Christ building is in fair condition; however, consideration needs to be given to the extensive water damage that has been sustained despite roof repairs and due to the ongoing vacancy of the building which has contributed to its deteriorated condition. The lower ground floor is in extremely poor condition, including extensive mould throughout and beyond curved joinery, does not demonstrate the retention of any significant fabric.
- A Napier Blakeley Technical Due Diligence assessment has calculated capital expenditure at over \$1.1 Million for compliance, make good and remediation works.
- The alterations and additions that have been undertaken to the Church building since construction would not detract from the integrity of the building but would need to be assessed in a Conservation Management Plan and a subsequent Statement of Heritage Impact regarding the potential impact of any alterations and additions on the significance of the subject site. This would include the removal of timber structures that



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have enclosed office spaces and preparation areas which while contributing to the operations of the Church, were likely introduced c.1970s and have ceased relevance with the closure of the Church.

- A comprehensive Conservation Management Plan should be undertaken to ensure that the significance of individual built elements are appropriately assessed, particularly prior to any works likely required due to the current condition of the building.
- Council should undertake further historical research regarding the development of the Church and site between 1902 and the closure of the kindergarten in 2016, to reflect the historical evolution of the site and in the absence of such information, consider the findings in this report.

On the 6th of December 2022, Council published the agenda of the 13th of December Local Planning Panel meeting. This agenda set out Council's own internal assessments and the heritage listings proposed by Council. The proposed corrections and changes provided by CofC and GBA Heritage with respect to Council's letter and Heritage Inventory Sheet have been largely accepted. It is noted that some of Council's assertions were incorrect, which raises questions about the validity of Council's assertions and assumptions over the value of moveable heritage contained within CofC's own premises. Council's access and time to suitably assess the moveable heritage values is also unknown. In any case, we agree that the significance of moveable heritage should be considered carefully and independently. CofC propose a cost sharing arrangement for a jointly appointed expert in ornamental heritage and associated elements that could provide certainty over any potential value of the moveable heritage, if any. This expert should be proficient in heritage elements, materials, churches, construction methodologies/processes and if possible, historical dating.

CofC respectfully requests that the Planning Proposal not be finalised until the moveable heritage study is completed and agreed on.

It should be made clear that CofC generally agree with the significance of the Site, however, a nuanced approach and consideration of significance and value should be applied to the Site given the extent of modifications, changes, evolution, and discontinuation of its use for 7 years. It is clear the significance of the Site is largely represented in the built form fabric and external facing elements. Minor internal furniture and elements are not only in poor condition, most of the furniture and elements are additions only from the last few decades. Asserting that these are of significant value would be improper, especially without a formal study.



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If you have any further questions, please do not hesitate to contact Matt Young direct on 0434 476 899.

Regards

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