

ASHLEY BUILT HERITAGE

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Ms Amita Maharjan
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Dear Ms Maharjan,

St Paul's Anglican Church Bankstown — Peer Review of Heritage Assessments

Geoff Ashley, Principal, Ashley Built Heritage has been engaged by Bankstown City Council to provide an independent review of two heritage assessments that reach very different conclusions in relation to the above site.

Background

Bankstown Council engaged Sue Rosen Associates to conduct research and prepare an interim significance assessment and heritage inventory in relation to St Paul's Anglican Church, Bankstown. The report of Sue Rosen Associates, 25 May 2015, found 'sufficient evidence for the listing of St Paul's Complex of Buildings in the heritage schedule of the Local Environment Plan'.

The Anglican Church as the property owner of the Church site engaged the services of GBA Heritage and a report was provided by Graham Brooks, Director GBA Heritage, on 18 February 2016 objecting to potential heritage listing, refuting the application of heritage criteria and the findings of the inventory prepared by Sue Rosen Associates.

A recommendation of the Sue Rosen Associates inventory report was that Council make an Interim Heritage Order (IHO) over the property. An IHO was gazetted on 6 November. The IHO lasts for six months during which time Council must make a decision as to whether it resolves to include the Church site as a local heritage item on the LEP.

The brief for this independent review required advice to Council about:

- How the heritage research by Sue Rose Associates was conducted and if it conforms to heritage management best practice.
- How the review of Sue Rosen Associates work was conducted by GBA and if the findings of this review conforms to heritage management best practice.

- Any other information that will assist Council in deciding which body of work can be reliably used to form a position on this matter.

Subsequently to the interim assessment and heritage inventory report, Sue Rosen Associates was engaged by Council to prepare a Supplementary Heritage Report. It is understood that both the Supplementary and Objection reports were provided to Council at the same time in February 2016 and that neither was prepared with reference to the other. Therefore, my review in relation to the GBA Heritage assessment will relate to the first report by Sue Rosen Associates only (except where I note relevant material in the Supplementary Report that may have answered a question raised by GBA Heritage).

As the third point of my brief requests any other information, I have made some comment on the Supplementary Report as well as from my own observations after reviewing the reports and visiting the site, to assist Council in making a decision on how to proceed in this matter.

In undertaking this review I have:

- Reviewed the three reports (two by Sue Rosen Associates and one by GBA Heritage);
- Reviewed relevant heritage guidelines; and
- Undertaken a site visit to the exterior and interior of the Church accompanied by a Church representative.

Two key guidelines that I have referred to are:

Local Government Heritage Guidelines, NSW Heritage Office 2002, which contains an earlier document as an Appendix *Assessing Heritage Significance* that addresses NSW local and State heritage criteria and also includes guidelines for inclusion and exclusion against each criterion.

Australian ICOMOS Practice Note: Understanding and assessing cultural significance, Version 1, 2013. This practice note includes reference to indicators for social significance such as sense of identity, meanings and associations that are most easily understood from interviews and surveys.

Sue Rosen Associates Interim Assessment and Heritage Inventory, May 2015

This report was undertaken as an interim report and this is consistent with the Local Government Heritage Guidelines that provides for an initial assessment prior to an IHO, provided that a more detailed assessment follows. This more detailed assessment has occurred (see my analysis below) but has come too late for any further review by GBA Heritage.

My comments below have been added under the headings contained in the Heritage Inventory.

Description

The description of the place is sound as is building evolution in terms of historical development, but perhaps less so in terms of the analysis of current built forms on site and their settings.

History

The history subsections and themes are well covered and places the Church in a very good historical context – at the beginnings of interwar suburban development for which Bankstown is well known. There is also a good description of the work of Norman McPherson. I note that Sue Rosen has written a book on the history of Bankstown.

It is possible that the author was not aware of a 2009 DA approval (DA 907/2009) for the demolition and alteration of the Church Hall and its Annex, Vestry and Toilet block, however, ideally this should have been identified through the documentary research and reflected in the outline history.

Application of Criteria

In my opinion the analysis for Criteria (a), (b), (c) (d) and (g) are based on good evidence and are sound, however, technical (e) and rarity (f) are not convincing.

In relation to (a), this is based on good historical evidence and theme identification, however, it could have been more analytical and assertive in explaining why that it demonstrates historic development.

In relation to (c), the evidence and description of aesthetic value is sound, but could have been further articulated.

In relation to social significance (d) this is always difficult and, ideally, requires place specific survey and/or interview to confirm personal associations and meanings. It does appear that reference to the online petition as evidence of social value is questionable (and is an actual an exclusion guideline as noted below under GBA Heritage review), however, the physical evidence of family association around the site and other documented evidence of community engagement, provides good evidence of the likelihood of current contemporary social significance.

Overall Review of Sue Rosen Associates Report

My overall review is that the Sue Rosen Associates Interim report and Heritage Inventory was conducted in accordance with best heritage practice generally: it followed appropriate assessment process in considering both physical and documentary evidence and applied appropriate criteria. The analysis of history and themes was strong and while the analysis of the current site and its setting was more limited this does not, in my view, question the meeting of most of the relevant criteria, including aesthetic. My review supports the Sue Rosen Associates assessment against 4 out of 7 criteria with a fifth, social, most likely following further assessment.

While full assessments are required to address the significance of site components and comparative assessments initial assessment to support an IHO do not. As noted below, the Supplementary Report addresses these aspects.

GBA Heritage Objection to Heritage Listing

My comments below are arranged under the GBA Heritage report sections.

Summary

I concur with GBA Heritage regarding limitations of the analysis of physical evidence in the Heritage Inventory which has a reasonable history of the development of the components of the site but is less assured in relation to an analysis of the current site, including the relationship between site elements and the overall setting. However, I strongly do not agree with GBA Heritage that the research conclusions of Sue Rosen Associates are incorrect.

While the inclusion and exclusion guidelines are not explicitly included by Sue Rosen Associates, and it would have been better if they had, I believe the author has understood these guidelines in the application of the heritage criteria. For example, in criteria (a) phrases such 'fabric demonstrating evidence of site development' reflects a professional understanding of inclusion and exclusion guidelines.

I agree that the inventory should have acknowledged as part of the site history the potential losses that can now result from the approved 2009 DA.

I strongly disagree that heritage listing of the site would ‘freeze’ an evolutionary development — to make such a claim supports the idea that any heritage listing is wrong.

Physical Description

I agree that the 1961 addition was more than ‘finishing off’ / modernisation. GBA Heritage implies, but does not state, that the additions reduce the value of the site whereas I believe that these add streetscape interest and boldness to the front, while reflecting a linked Gothic inspired response during both pre and post WWII periods.

GBA Heritage thinks the original section of the church is Inter-War Gothic whereas Sue Rosen Associates thinks it is Inter-war Romanesque. I think that it has elements of both but I agree with GBA Heritage that the substantive addition needs to be acknowledged in the description. I think therefore that Post War Ecclesiastical should be included in the description for the Chapel Street frontage. As noted below, I think the Church represents both periods in a linked and very positive sense.

While I agree that the site master plan was not fully realised – from the effects of the war etc — the site does still have value in reflecting the intentions of the master plan, especially with the landscape space on the corner that has not been commented on by either Sue Rosen Associates or GBA Heritage.

While there is no documentary evidence of McPherson’s hand in the 1961 work (and this was stated in the Supplementary Report that GBA Heritage has not seen) I do believe the examples of McPherson work up to the 1960s in the Supplementary Report (also that GBA Heritage would not have seen) and the consistent materials and style leads me to think it most likely to be his or his firm’s.

The interior is a fine work, both spatially and in its detailing. I also believe the 1960s extension respects the ‘muscular’ style of the early part (that I think is more Romanesque than Gothic in its inspiration).

I agree that the Rectory awkwardly abuts the rear of the Church, and its segmental apse in particular.

Historical Notes

While there is a strong stylistic change in the 1961 additions, I believe that it is a very consistent interpretation of the Gothic in pre and post WWII styles and in the same materials, suggesting the same architect. I also note the comparative assessment in the Supplementary Report that notes the similar work into the 1960s by the office of McPherson. In relation to the comment that it is not a great example of his work it does not need to be the best example to be listed locally. I believe it most likely to reflect a pre and post WWII work on the same church by the same architect or architect’s firm and is thus very interesting.

The evidence of community involvement and association may be also found in other church communities, but that this is important to this community is no less valid.

Application of Criteria

Historic (a): I disagree with GBA Heritage – I accept the opinion of Sue Rosen Associates that the site reflects a significant phase in Bankstown suburban and community development in the inter-war period, eg from the railway development, and also the continuity of site use and development.

Association: I disagree with GBA Heritage – the families noted by Sue Rosen Associates are presumably well known families and the physical memorials are real. The association with McPherson is reasonable – he was a prominent

church architect and this church most likely represents an unusual reflection of both pre and post WWII neo Gothic styling.

Aesthetic (c): I disagree with GBA Heritage – I think it is associated with the work of a prominent ecclesiastical architect reflecting (most likely) both pre and post WWII design ideas. I also believe the site has aesthetic value reflecting the basic ideas of the master plan for a prominent church with an open corner site. This adds streetscape value, as does the prominent form of the church frontage and bell tower.

Social Significance (d): while I agree with GBA Heritage that the ‘online petition’ aspect cannot be relied on in relation to social meaning and associations, I do believe that the other physical aspects (memorials) and documents regarding activities show the likely potential social significance, that is yet to be fully assessed, through, say, interview.

Technical or Research (e): I agree with GBA Heritage that the connection between Rectory and Church does not have technical or research potential.

Rarity (f): I agree that while the Rectory linkage to the Church may have interest in the original master plan the resolution in the actual building is poor as it impacts the setting of the Church.

Representative (g) I disagree with GBA Heritage and consider the site does represent type well and is also representative of aspects of variation in pre and post WWII periods reflecting similar Gothic church design themes. Its setting does contribute to the streetscape values of central Bankstown.

Integrity: While it has two distinct phases and parts I think both have a high degree of integrity to themselves and reveal well the changes in design approach pre and post WWII. The overall interior has a very strong sense of integrity. The other site buildings do not hold this aspect of integrity. The site as a whole retains some reflection of the site master plan intentions with the retained street corner landscape space.

Conclusions

I reiterate that listing on the LEP does not equate to ‘freezing’ the site.

Overall Review of GBA Heritage

I consider that while GBA Heritage raised a number of good questions in relation to built fabric and overall site analysis, I do not agree that these questions reduce the overall strength of the Sue Rosen Associates assessment and its conclusions relevant to the assessment criteria.

I do not generally agree with the response to assessment criteria provided by GBA Heritage. There appears to be a State level ‘lens’ used by GBA Heritage in relation to the criteria. For example, in relation to social significance saying it’s similar to the type of evidence found in other local government areas may be true but that is no reason to not identify its value for this local government area.

Further Information considered

The Sue Rosen Associates Supplementary Heritage Report

This Supplementary report adds good architectural context and comparison regarding the church design and designer. While there is reasonable analysis regarding comparative examples, it would have been helpful to address the likely ‘provenance’ of the 1961 addition more clearly. For example, while the architect is not proved

there appears to be stylistic evidence from churches that he/his firm designed into the 1960s that are very similar to the frontage of St Paul's.

I consider that the significance grading of elements is reasonable in historic significance terms, however, I question the Rectory as Moderate in relation to its physical form and poor siting that intrudes on the Church.

There have been some edits on text that provides some subtle change in relation to criteria, however these are not substantively different to the Interim report.

It is not clear to me what is meant in criteria (e) technical/research regarding the link between Rectory and Church re 'changing aspirations of the parish in the implementation of McPherson's original design for the complex'.

My further comment

While not proved, I think it most likely that the 1961 addition was by Norman McPherson or his office. If not, I would contend that the pre and post WWII phases are consistent in many aspects and sit well together, while also reflecting their periods of construction in that difficult period of the twentieth century and therefore contribute to, rather than reduce, interest and value.

The open landscaped space on the site corner provides relief in the built up streetscape and a good open setting for the Church itself. McPherson's idea of open space on this corner has been missed in the reports reviewed – the open space is valuable in a fine grain suburban way and worthy of retention as the Bankstown centre intensifies.

The issue of DA consent in 2009 for this site should be acknowledged and dealt with in any listing of the site on the LEP to assist future site planning.

In my opinion, there has been a decrease in significance over time to the Hall, which was already approved for demolition in the 2009 DA, and the Rectory is poorly sited and impacts the Church. The site as a whole should be listed to ensure development on this and adjoining sites respects the setting of the Church. In my opinion, the Church with the open landscape space to its north should be retained in the long term as fine grain urban area in central Bankstown.

The apse section of the Church is very strong but is not visible because of the locations of the Rectory and Vestry. Future site development if it was to include removal of the Vestry and Rectory would allow the Church to be seen 'in the round'.

Point 8 in GBA Heritage conclusion refers to Urban Growth planning for Bankstown. I would argue that some retained 'fine grain' urban form aspects such as the Church (as well as others such as the Council Chambers and Civic Centre one block away) are important places to retain in the Bankstown urban centre.

The Supplementary Heritage Report should be provided to GBA Heritage and the site owner as part of Bankstown City Council deliberations on this site, appreciating that a listing decision must be made at Council's meeting on 26 April prior to the IHO lapsing in May.

Conclusions

I was asked to review two heritage reports prepared in relation to St Paul's Church Bankstown, one by Sue Rosen Associates, 25 May 2015 and a second by GBA Heritage, 18 February 2016.

My review finds that the Interim Heritage Assessment and Heritage Inventory prepared by Sue Rosen Associates 25 May 2015 was conducted in accordance with best heritage management practice and is based on sound evidence.

In comparing the two reports it is reasonable to note that the GBA Heritage report was primarily a response to and critique of the Sue Rosen Associates, rather than being a fully researched 'freestanding' separate report. As such the GBA Heritage report asks some good questions in relation to the evidence in the Sue Rosen Associates report. While I concur with GBA Heritage that there are some limitations in the Sue Rosen Associates report in regard to the physical analysis of buildings and site, I do not believe that these limitations fundamentally question the application of the heritage criteria in the report. While it is fair to say reference to inclusion and exclusion guidelines may have assisted the Sue Rosen Associates assessment, I have concluded the assessment is appropriate in relation to most criterion. While the Sue Rosen Associates has the site meeting seven out of seven criteria and GBA Heritage has none out of seven, my review makes it four out of six, with social significance a most likely potential significance to be confirmed through personal survey and/or interview.

The Sue Rosen Supplementary Heritage Report of February 2016 adds some good comparative assessment and its graded elements of the site (when also seen with the 2009 DA consent) would assist future site planning by the owner. In my opinion, the whole site should be listed recognising that not all site elements would need to be retained in the future, as noted in my comments.

Recommendations

Provide GBA Heritage and site owner the Supplementary Report and the opportunity to respond prior to or at the 26 April meeting of Bankstown City Council.

That Bankstown City Council use the Sue Rosen Associates reports as the basis to resolve to list St Paul's Anglican Church the current site on the LEP to ensure protection while future development is contemplated.

That listing includes the current site area, but noting previous consents and the relative significance of elements identified in the Supplementary Report by Sue Rosen Associates February 2016.

Yours sincerely,



Geoff Ashley
Principal

6 April 2016