

INNER WEST



Engagement outcomes report *Proposed heritage listing of 389 Illawarra Road, Marrickville*

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Summary

The proposal to list 389 Illawarra Road, Marrickville as a heritage item in the Marrickville Local Environmental Plan (MLEP) 2011 was exhibited for public consultation for 28 days between 7 August 2020 and 4 September 2020. Exhibition included a page on the *Your Say Inner West* (YSIW) and 118 letters posted to surrounding neighbours, including landowners and occupiers.

During exhibition, the YSIW project page was viewed 1640 times with relevant documents downloaded 258 times.

Respondents were asked “Do you support the planning proposal to heritage list 389 Illawarra Road Marrickville”. There were 297 responses to this survey. Initial analysis showed that 115 (39%) responses supported the heritage listing, whilst 176 (60%) opposed heritage listing the site and 4 (1%) of the submissions were neutral.

However, a number of respondents seem to have misinterpreted the question and purpose of the planning proposal. When this is taken into consideration, 140 (47%) support the heritage listing, 153 (52%) oppose the listing and 4 (1%) remain neutral.

Further, many of the submissions referred to the potential future use of the site that is possible with or without the listing, which does not form a consideration for listing a site. When submissions solely referring to these reasons and no other are negated from the equation, there are 213 submissions remaining, 135 (63%) are in support of heritage listing the site and 74 (35%) oppose it

Background

On 15 January 2020, an Interim Heritage Order (IHO) was issued for 389 Illawarra Road, Marrickville, affording the site 6 months of heritage protection whilst investigations were undertaken in determining the significance of the site.

The IHO was triggered by the lodgement of a development application (DA) for the demolition of the church and construction of a 6-storey mixed use development containing affordable housing and ground floor retail tenancies.

An appeal against the IHO and deemed refusal of the DA are being considered by the Land and Environment Court.

Council engaged heritage consultants, Hector Abrahams Architects, to complete a heritage assessment of the site. They concluded that the church meets NSW Office of Environment and Heritage criteria for local heritage significance and recommended heritage listing the site. On 23 June 2020 a planning proposal to list 389 Illawarra Road, Marrickville was reported to Council. It was endorsed by Council to be sent to the Department of Planning, Industry and Environment (DPIE) for a gateway.

A gateway determination was received from the DPIE, requiring among other things, that the proposal be exhibited inviting public submissions for 28 days. The proposal was exhibited for 28 days between 7 August and 4 September in accordance with the gateway determination.

Engagement Methods

Several engagement methods were utilised, including the following:

- Online on yoursay.innerwest.nsw.gov.au
- Via email

Promotion

- Direct mail - 118 letters sent to surrounding land owner/occupiers
- Council website in the news/announcement section
- Social media

Engagement outcomes

How did people respond?

In total there were 299 unique formal responses made to Council regarding the proposal. This included 297 responses to the survey on the HYSIW web page and two e-mailed responses.

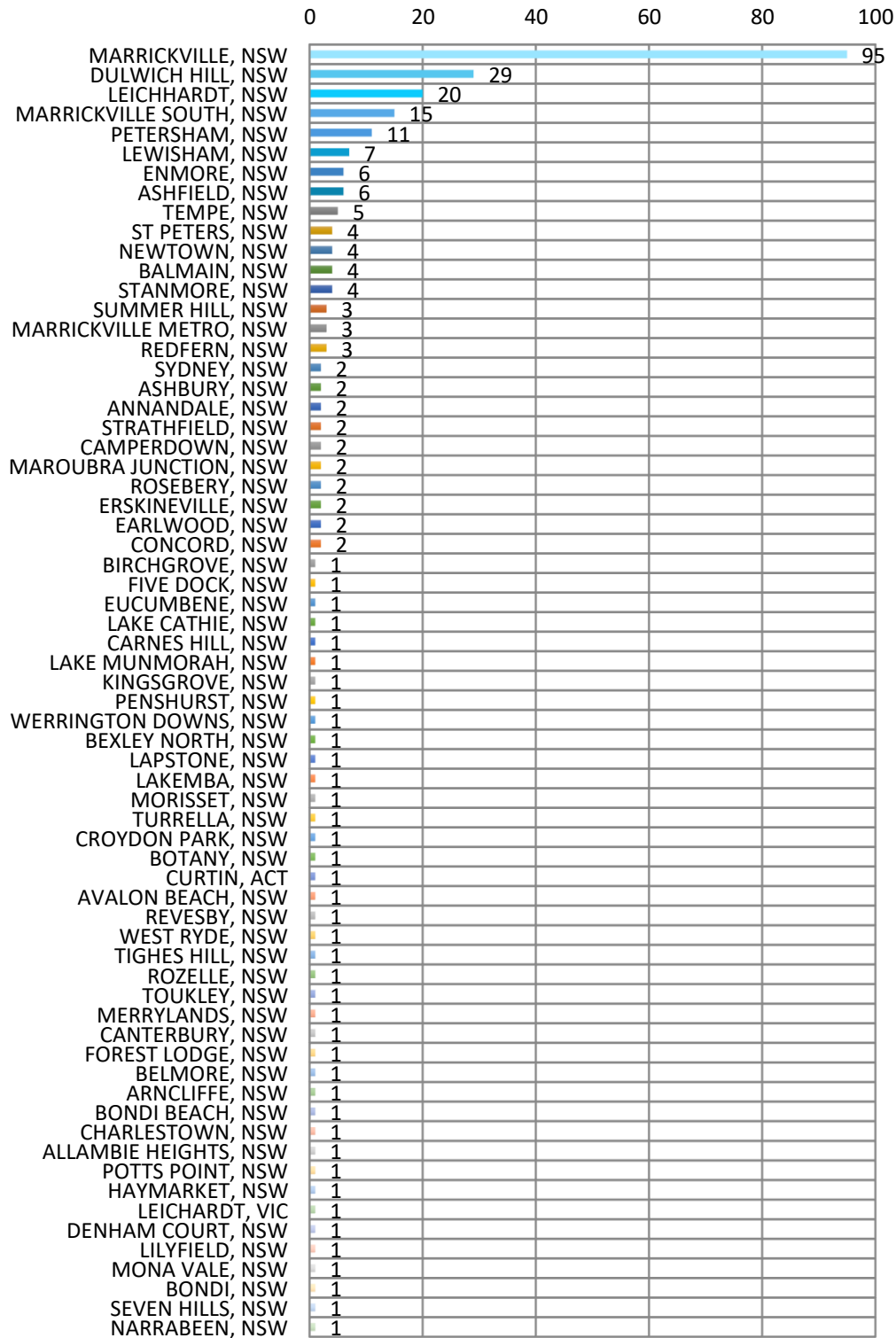
Who did we hear from?

Of the responses, 18 were on behalf of businesses or organisations and 281 were from individuals.

The vast majority of the online survey responses were from residents, businesses and organisations in Marrickville, followed by Dulwich Hill, Leichhardt and Marrickville South. Most responses were from residents, businesses and organisations in the Inner West Council area. A graph has been included below identifying where respondents are located;

55 submissions (18%) were from outside Inner West LGA.

Suburb



What did they say?

Your Say Inner West - online responses

“Do you support the planning proposal to heritage list 389 Illawarra Road Marrickville”.

There were 297 responses to this survey. 115 (39%) responses supported the heritage listing, whilst 176 (60%) opposed heritage listing the site. 4 (1%) of the submissions were neutral.

Upon further review of the comments made against survey question responses, there are a number of comments that do not align with the survey answer given. The question “Do you support the planning proposal...” has likely confused respondents. They have likely assumed this referred to supporting the development application for the redevelopment of the site into affordable housing.

With consideration of the comments made, 140 (47%) support the heritage listing, 153 (52%) oppose the listing and 4 (1%) remain neutral.

The following themes emerged from community feedback:

Key themes in the 140 supporting submissions:

- The church has heritage significance and is a part of local history (118)
- The church benefits the Illawarra Road streetscape (12)
- The church should be adaptively reused for a more desirable use (21)
- Not listing the church will lead to overdevelopment of the area (30)
- The church adds to local character (17)
- The church is valued by the community (10)
- The church is a local landmark (4)

Three responses also made mention of the DA under assessment for the site.

Key themes in the 153 opposing submissions:

- Preference for affordable housing in accordance with the DA under assessment for the site (131)
- The church lacks heritage significance (29)
- The church is ugly (10)
- The church is redundant and unusable in its current form (22)
- Heritage listing the site limits future development potential (12)
- Use of an Interim Heritage Order once a DA is lodged is poor process (18)
- The building is decaying and structurally unsound (7)

Key themes of the 4 neutral submissions:

- Retain the façade in the redevelopment (2)
- Affordable housing mentioned in the submission (2)

Comments received from organisations/groups/stakeholders

- Church of Christ Property Trust (the owner of the site)

- This submission contests the views and interpretations of the heritage assessment and opposes its heritage listing.
- It highlights the benefits of the use proposed under the development application.
- Heritage NSW
 - Supported the Hector Abrahams Architects heritage assessment and noted that the church met the criteria for listing at a local level.
- Marrickville Heritage Society
 - It is an important part of the history and heritage of Marrickville and the Inner West. The church is significant for its rarity, intactness and connections to the local community
- Nightingale Housing (affordable housing provider)
 - The impetus of the heritage listing is mainly aesthetic and anti-development in nature
 - The assessment undertaken by Hector Abrahams Architects advises that the site does not satisfy the criteria of being *important for its associations with an identifiable group* or *important for a community sense of place*
 - Listing the site would preserve the architectural fabric on site but would accelerate the dismantling of the working class neighbourhood it was originally built to serve
 - The social benefit of affordable housing has not been considered in this listing
 - Affordable and equitable housing is in dire need in this area.

Officer comments in response to public exhibition

Response to key themes

The following table identifies and responds to the key themes raised in submissions.

	Key theme (no. of submissions)	Response
Supporting submissions key themes	The church is heritage significant and a part of local history (118)	This is supported by the heritage assessments prepared by Hector Abrahams Architects in 2020 and the Paul Davies in 2015.
	The church benefits the Illawarra Road streetscape (12)	Noted.
	The church should be adaptively reused for a more desirable use (21)	Noted.
	Not listing the church will lead to overdevelopment of the area (30)	The potential future use of a site is not a consideration when determining heritage significance. Five survey responses exclusively referred to this reason support of the listing.
	The church adds to local character (17)	Whilst adding to local character is not a direct consideration, the site being aesthetically distinctive is. Hector Abrahams Architects

		determined that the site is aesthetically distinctive in their assessment.
	The church is valued by the community (10)	Noted.
	The church is a local landmark (4)	Having landmark qualities is a consideration in determining the heritage significance of a site. The Hector Abrahams Architects 2020 heritage assessment considers the site to have moderate landmark qualities and this forms part of its heritage significance.
Opposing submission key themes	Redevelopment of the site for affordable housing in accordance with the DA lodged is preferable to heritage listing and retaining the site. (131)	The potential benefit in redeveloping a site if it is not heritage listed is not a matter of consideration in determining if a site is heritage significant. 79 submissions exclusively referred to this as the reason for opposing the heritage listing.
	The Church lacks heritage significance (29)	This statement is contrary to the independent heritage assessment undertaken by Hector Abrahams Architects in 2020 and another assessment by Paul Davies in 2015.
	The church is ugly (10)	Noted. Being visually detracting or appealing does not form the criteria to assessment the heritage significance of a site.
	The church is redundant and unusable in its current form.	Noted. The usability of a site does is not a consideration in determining the heritage significance of a site.
	Heritage listing the site limits future development potential	Development potential is not a matter of consideration in determining if a site is heritage significant.
	Use of an IHO once a DA has already been lodged is poor process.	Utilising an IHO to investigate a site is not Council's preferred method of listing a site. In 2015 a number of sites, including this one, were deferred for listing pending future investigations. Council staff are currently revisiting a number of sites that were deferred, including this one at the time of issuing the IHO.
	The building is decaying and structurally unsound.	Noted. The structural integrity of a building is not a consideration in determining its heritage significance.

General discussion of feedback

On face value, the majority of feedback is unsupportive of amending the Marrickville Local Environmental Plan (MLEP) 2011 to list the site as a local significant heritage item. However as outlined in the summary of this document if the submissions that relate specifically to the concurrent development application are not included in the calculations, of 213 submissions, 135 (63%) are in support of heritage listing and 74 (35%) oppose it.

It is noted that a sites potential to deliver desirable development in the future is not a relevant criterion in determining the heritage significance of a site.