

Upper Fort Street, Observatory Hill
Millers Point, NSW 2000
GPO BOX 518
Sydney NSW 2001
T +61 2 9258 0123 F +61 2 9251 1110
www.nationaltrust.org.au/NSW

21 July 2020

Marcus Jennejohn
Contact Planner
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Jennejohn

This submission addresses the issues raised in the documents as exhibited, notwithstanding the very welcome announcement by the NSW Government on 4 July 2020, that the Ultimo Powerhouse Museum will be retained and remain open.

The National Trust objects to the proposed Parramatta Powerhouse (SSD-10416). The development as proposed:

- Will irrevocably destroy two heritage listed places highly valued by the local community
- Will not accommodate a world class cultural institution for the display of objects illustrating the industrial advance of civilisation and the development of inventions and manufacture
- Is not a power house in either the literal or metaphoric sense

The National Trust is concerned that the development being put forward as State Significant Development (SSD) 10416 is not intended to be a museum. The Ultimo Powerhouse Museum clearly projects itself as a museum (A building in which objects of historical, scientific, artistic, or cultural interest are stored and exhibited), however, the Parramatta proposal is put forward as "Powerhouse Parramatta" with no mention of the word "museum" and of course no "powerhouse" at the site.

Approval is being sought for construction of Powerhouse Parramatta, including:

- front and back-of-house spaces seven major public presentation spaces;
- studio, co-working and collaboration spaces comprising the 'Powerlab', supported by residences (serviced apartments) for artists, students, researchers and scientists, and dormitory beds for school students;
- education and community spaces for staff, researchers and the Powerlab Residents, the community, and education and commercial hirers;
- commercial kitchen comprising the 'Powerlab Kitchen' used for research and product development, and as a destination, education and event space;
- film, photography, and postproduction studio that will connect communities with industry and content that will interpret the Powerhouse Collection;



public facing research library and archive for community, industry, students and researchers to access materials; and a mix of retail spaces including food and drink tenancies.

The word "museum" is notably absent and this development proposal is clearly not meant to provide the necessary infrastructure and design requirements that would establish a world class "Museum", along the lines of the Ultimo Powerhouse Museum.

The Trust makes the following comments with regards to the proposal at Parramatta:

1. Heritage values

The heritage values of the proposed site, being 34-54 and 30B Phillip Street and 338 Church Street, Parramatta should be conserved.

The Dharug people, as the traditional landowners of the Parramatta area, have lived in the area for thousands of years. The Parramatta River is noted to be of great significance to local Indigenous people, providing a source of food and freshwater. There are strong Dharug communities living in Greater Western Sydney.

The National Trust has, in the past, identified and included the following places on the National Trust Register:

- St George's Terrace, Parramatta listed 1984
- Willow Grove, Parramatta listed 1985
- Parramatta and Lane Cove Rivers Landscape Conservation Area listed 1982

Willow Grove and St George's Terrace have statutory recognition and protection as heritage places as they are included on the heritage list (Schedule 5) of the Parramatta Local Environmental Plan 2011. Places of cultural significance should be conserved.

The people of Parramatta have conveyed to Parramatta City Council that they want a new museum that expresses the identity of Parramatta and Western Sydney, and is drawn from the history of the local area. They also want to ensure Parramatta's cultural heritage is a cornerstone of future development.1

Destroying Parramatta's local heritage by demolishing Willow Grove and St George's Terrace is not respecting the history and identity of Parramatta, nor is it facilitating the community want for heritage to be the cornerstone of future development. The authentic character of a place comes with managing change over time. The new responds to and respects the context of the old. Parramatta is a historic place, not a greenfield site.

The Design Guide for Heritage prepared by the NSW Government Architect's Office states:

"Heritage places can tell stories that are relevant and meaningful for diverse groups. They help retain memory, while also creating new stories and identities as communities change."

¹City of Parramatta (2017), Culture and Our City: A cultural Plan for Parramatta's CBD 2017-2022.



The people of Parramatta want to celebrate their identity, and they value the stories and places from their past. Keeping Willow Grove and St George's Terrace along with other recognised heritage places in Parramatta will bring meaning to future generations in regard to the stories being told about their local area.

'Locally significant' must not become a synonym for expendable.

Consistent with the strategic directions and objectives in the *Greater Sydney Regional Plan* and the *Central City District Plan*, heritage places should be conserved and enhanced. Willow Grove and St George's Terrace should not be demolished and their heritage values should be retained.

2. Statement of Heritage Impact

The Trust believes that some of the facts as set out in the Statement of Heritage Impact by Advisian are incorrect.

i. History of the Museum of Applied Arts & Sciences (MAAS)

The MAAS Museum was not established in 1879 in the Garden Palace of the Sydney International Exhibition. In fact, the forerunner to the Museum of Applied and Sciences, the Technological and Sanitary Museum, opened in 1883 in the former Agricultural Hall of the International Exhibition.

This misrepresents the history of the museum and the importance of the Ultimo location to the significance of the museum. It has only moved twice since opening and both moves were to locations in Harris Street, Ultimo:

- 659 Harris Street Ultimo: In 1893, the museum moved to a purpose-built venue at 659 Harris Street Ultimo. The building was designed by architect William Kemp, where it was associated with the Sydney Technical College (1891), also designed by Kemp. This association was in line with the original intent that the Museum should have an educational aspect. The museum and the other buildings in the Sydney Technical College Group formed an educational hub. The Technical College offered practical training and the cultivation of expertise through technical education, while the museum served an important education and research function inspiring the students of the Sydney Technical College and other visitors with examples and explanations of the world's best manufacture. In accordance with this mandate, the Museum assembled a collection of the finest examples of skill and industry in the areas of technology, manufacturing, science and craft in NSW.
- 500 Harris Street, Ultimo: In 1978, the then Minister for Public Works asked the Government Architect's Branch to specifically investigate moving the MAAS to the former Power House buildings at Ultimo. The report produced by the Special Projects Section of the Government Architect's Office was the "Power House: a study of the relocation of the Museum of Applied Arts and Sciences, in a development of the Ultimo Power Station and the Ultimo Tramway Depot, Sydney". The report concluded that "For the purpose of developing a new Science and Technology Museum in the late twentieth-century mould, the site (Ultimo Power Station and Tramway Depot) has outstanding potential. It is historically appropriate, structurally flexible and remarkably cost effective. What could be more appropriate for such a Museum than the first major power-house in Sydney? And what building in Sydney has interior spaces built on such a generous scale to accommodate the Museum's exceptional transport and engineering



collections?" The Powerhouse Museum was one of the first of the 'new' generation of museums that opened in Australia in the 1980s. Museums moved from a didactic single point of view model to a more democratised, participatory, representative and interactive engagement experience. The Museum is the premier repository in NSW, if not Australia, for important historical artefacts and examples of Australian manufacturing innovation and adaptiveness.

ii. Impact of cumulative loss of heritage

The Advisian assessment of cumulative heritage loss lacks depth and detailed analysis.

The Advisian assessment concludes:

"The proposal is considered to have a minor cumulative impact on the loss of heritage in the Parramatta area in consideration of other nearby current and future developments" (p.10)

They draw this conclusion from:

"consideration of (a) the nature and scale of the proposal; (b) potential impact to heritage by other nearby current and future developments, and; (c) the perspective of local communities, the proposal is considered to have a minor cumulative impact on the loss of heritage in the Parramatta area." (p.77)

In support of their conclusion, they summarised the impacts of the Parramatta Light Rail on Parramatta's heritage being the demolition of the Royal Oak Hotel and a major visual impact on the Lennox Bridge, and identified the Sydney Metro West and Parramatta Civic Link as having the potential to contribute to further cumulative impacts. No further analysis was undertaken.

Cumulative means the increasing in quantity, degree or force by successive additions. Advisian made no attempt to quantify the loss of heritage beyond the very recent, and despite the Sydney Metro West also being a NSW Government project at the advanced planning stage, they did not extrapolate on the expected loss of heritage for this project. In assessing cumulative loss point zero isn't now, and future loss while still unknown could be estimated, particularly for advanced NSW State Government projects.

Local heritage has been protected under the *Environmental Planning and Assessment Act* since 1979. In 1985, the Ministerial Direction *G21 – Conservation of Environmental Heritage and Ecologically Significant Items and Areas* facilitated the conservation of locally significant heritage items through Local Environmental Plans and Development Control Plans.

As an outcome of several heritage studies numerous heritage places have been statutorily protected as heritage listed places on the Parramatta City Council's Local Environmental Plan. The first plan including heritage was the *Parramatta Local Environmental Plan 1996 (Heritage and Conservation)* which identified heritage items and conservation areas.

Just last month, The Royal Oak Hotel a significant local heritage land mark was demolished, and in the last year the Roxy Theatre, just up the road from Willow Grove, was saved from substantial demolition in the Land and Environment Court. The Roxy's development remains unresolved and its future is still uncertain. Increased density of development in the CBD poses ongoing threats to local heritage. Yet the assumption is that the loss of two 'only locally listed heritage items' has no impact. Figure 1 below shows the Heritage Map from the block on which the Parramatta Powerhouse is

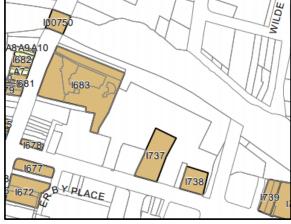


proposed to be sited. What can be seen is from 2015 to the proposed demolition of these heritage places, three out of four or 75% of the heritage items on this block will have been lost.

Figure 1: Cumulative loss of heritage in the immediate vicinity of the proposed Powerhouse Parramatta

A: Heritage Map 2015

Grove and St George's Terrace were to occur





B: Heritage Map if demolition of Willow

What is being destroyed is further analysed in Table 1. It shows that within a 200m radius the two properties at threat of demolition are the only locally valued heritage items being examples of late 19th century residential development within a block (200m) of the site.

Table 1: Heritage items within 200m of the centre of the Willow Grove/St George's Terrace site (sites proposed for demolition highlighted yellow)

Item No	Address	Description	Year	Period
1737	34 Phillip Street	Willow Grove	c.1890- 1891	Late 19 th Century
1738	44 Phillip Street	St George's Terrace	1881	Late 19 th Century
1739	64 and 66 Phillip Street	Barnaby's Restaurant (and potential archaeological site): Historical and aesthetic values and as a representative and rare example of Colonial Georgian style houses in the local area. Site possesses potential to contribute to an understanding of early urban development in Parramatta, as it illustrates some of the early small scale Parramatta buildings sited close to the footpath	c.1840	Municipal Development



Item No	Address	Description	Year	Period
1740	70-74 Phillip Street	Office (and potential archaeological site):	c.1809	Town Development
1678	306 Church Street	Former ANZ Bank (and potential archaeological site):	c. 1889	Late 19 th Century
		representative example of a Victorian Free Classical style building in the area		
1677	302 Church Street	Shop and archaeological site	1850s	Municipal Development
		Remnants of sandstone and brick walling are evident along the northern boundary up to the north eastern corner and it is suspected that an historic sandstone facade may be behind the modern panelled street facade. This facade could date back to the 1850s and would be one of the earliest remaining in Church Street.		
1733	On riverside	Charles Street Weir	1950-1951	Post-war
		Charles Street Weir has historical, aesthetic, social and scientific significance. The heritage significance of the Charles Street Weir is enhanced by its place within a recreational reserve. For the local community, it holds an important sense of place.		
1735	On riverside	Wetlands	Natural	
		The wetlands along Parramatta River are of significance for Parramatta area as remnant representative areas of mangroves and salt marshes which once extensively lined the foreshores and tidal water flats of the region.		
100750	On riverside (north) 330A Church Street	Lennox Bridge State listed	1836-1839	Town development
		Professional, trade and manufacturing practice - example of the work of notable engineer. David Lennox. Site possesses potential to contribute to an understanding of early urban development in Parramatta. One of Parramatta's most		



Item No	Address	Description	Year	Period
		important historic structures, and one of the earliest bridges in New South Wales and Australia.		
100248	182 George Street	Harrisford and potential archaeological site	c.1823- 1829	Town Development
		Two storey Old Colonial Georgian house of brick with stone quoins now painted		
1672	286, 292, 298 Church Street	Sandstone and brick wall:	1850s	Municipal Development
		Sandstone and brick walls of former buildings, incorporated into the present buildings. Sandstone wall with external chimney flue also lintel over triangular niche approximately where second floor would be. Holes for rafters/floor joists also are in view. Modern facades may conceal remnants of two-storey buildings. Side walls of an early Victorian building remain.		
	48-50 George Street	Civic Arcade and potential archaeological site:	1924	Inter-war
		The Civic Arcade is of historical and social significance as the site of the first cinema in Parramatta. Together with successive cinema structures this site has been used socially for entertainment for 50 years. Although gutted internally the George Street facade retains most of its form, the high parapet wall and main cinema building envelope and riveted steel awning. The site has archaeological potential related to European occupation since 1790		
100218	2 Horwood Place	Redcoats' Mess House (and potential archaeological site):	1830s	Town Development
		Evidence of the major role of colonial and state government in Parramatta. Site possesses potential to contribute to an understanding of early urban development in Parramatta		
100278	90 George Street	Shop and office (and potential archaeological site):	1835-40	Inter-war
		An example of stone buildings that characterised the townscape of nineteenth century Parramatta, and are now rare. Site possesses potential to contribute to an		



Item No	Address	Description	Year	Period
		understanding of early urban development in Parramatta.		
100278	35 Smith Street	Shop and office (and potential archaeological site):		Colonial archaeology
		This AMU has exceptional archaeological research potential. This area was part of the early Rose Hill settlement and the commercial centre of Parramatta through the convict and colonial periods to the present day.		
100711	69 George Street	Roxy Theatre:	1930	Inter-war
		The Roxy Theatre has high cultural significance as a good and relatively intact representative example of the 'Picture Palaces' of the interwar period, its overall form and surviving original fitout and fabric displaying the major attributes of this building type. More particularly it is an excellent example of 'Interwar Spanish Mission' style, displaying features typical of this style but also with a notable individuality and quality of architectural design		

The assessment of heritage loss in the Parramatta CBD should not be restricted to an assessment of visual curtilage and in the vicinity. The ongoing and cumulative loss of heritage in Parramatta is removing and or irrevocably damaging important historical layers of Parramatta's highly significant heritage townscape. Table 2 and 3 lists recent removals of items from Schedule 5. The retention of local heritage is fundamental for the community to interpret and understand the history, settlement and development of Parramatta. Willow Grove and St George's Terrace must be retained.

Table 2: Heritage items removed from Schedule 5 – Parramatta LEP in Parramatta and North Parramatta

Amendment No.	Amendment link	Address	Status
Am 2012 (360), Sch 1 [5];	Parramatta Local Environmental Plan 2011 (Amendment No 1). LW 3.8.2012. Date of commencement, on publication on LW, cl 2.	38 Marion Street, Parramatta Lot 9, DP 906071,	Listing gone, demolished.
2014 (134), Sch 1 [1]–[9];	Parramatta Local Environmental Plan 2011 (Amendment No 5). LW 21.3.2014.	12 Byrnes Street North Parramatta Lot 1, DP998899	Listing gone, out of CBD zone (demolished before 2009)
	Date of commencement, on publication on LW, cl 2.		Listing gone, just North Victoria Road (demolished prior to 2013)



		Lot 1, DP 731734	
			Listing gone. Demolished earlier.
		19 Fennell Street Parramatta Lot 63, DP 609744	Listing gone, still in a HCA 21 is an item (demolished even though item in a HCA)
		28 Lennox Street Parramatta Lot 1, DP 60286	Listing gone, demolished – same block as Early Street, archival done in 1999
		Stewart Street Parramatta (Stone edging to road carriageway)	Listing gone, adj Newlands
		Tennyson Street Parramatta (Stone edging to road carriageway)	Listing gone.
2020 (57), Sch 1[3]–[13].	Parramatta Local Environmental Plan 2011 (Amendment No 40). LW 21.2.2020. Date of commencement, on publication on LW, cl 2.	330 Church Street Parramatta Schedule 5, Part 1, Item I683 Omit the item.	Former David Jones Department Store (opened 1961) In the 1960s a stone cottage was demolished to make way for the store

Table 3: Recent and proposed demolitions not yet removed from Schedule 5

Amendment No.	Amendment link	Address	Status
2015 (760), Sch 1 [23] [24];	Parramatta Local Environmental Plan 2011 (Amendment No 10). LW 18.12.2015. Date of commencement, on publication on LW, cl 2.	Added Parramatta Royal Oak Hotel and stables (and potential archaeological site) 387 Church Street Lot 1, DP 85794 Local 1691	Royal Oak Hotel demolished on Saturday 6 June 2020. Stables remain.
2020 Current planning proposal	PP 2020 COPAR 001 00 Planning proposal is being assessed	Parramatta Part Lot 1 and Part Lot 2, DP 1110057	16/12/2019 Planning proposal to delist St John's Parish Hall – DA to demolish the hall and erect two towers behind cathedral

Other properties with potential for future heritage impact from the construction of the Parramatta Metro Station include:

- 41-59 George Street, Parramatta (sandstone shops)
- 62-64 Macquarie Street Parramatta (Kia Ora)
- 202 Church Street Parramatta (Horse parapeted shops)

iii. Identification and assessment of heritage items

The Secretary's Environmental Assessment Requirements (SEARS) state:



"Identify all heritage items (state and local and potential) and conservation areas within and near the site, including built heritage, landscapes and archaeology, include detailed mapping of these items and an assessment of why the items and site(s) are of heritage significance"

Willow Grove

The history of Willow Grove and the accompanying Statement of Significance in the heritage impact statement are incorrect. The house was built in 1891, it was architecturally designed and the original owners who commissioned the build were important and highly valued members of the Parramatta community in the late 19th century.

The site was owned by Annie Gallagher from 1892 (Vol-Fol: 1052-160). Annie's husband, Thomas Francis Gallagher had died of influenza on 3 November 1891. Thomas Gallagher had been an alderman of the Borough of Parramatta before his death.

In 1890, Thomas Francis Gallagher, commissioned architect Sydney Moore Green to build a house in Phillip Street Parramatta. Sydney Green invited builders to tender for the construction of the house in an advert in the Cumberland Argus and Fruitgrowers Advocate published on 29 November 1890 and readvertised 17 January 1891. The house was completed by November 1891 as Thomas' funeral departed from his residence at Phillip Street Parramatta. There is a photograph of Annie at the front of her house, published in 1899 in *Parramatta and districts illustrated with a review of chief municipal, electoral, industrial and commercial factors of Parramattan progress*, 1899 (p.33)

The Gallaghers were important members of the Parramatta community. Their retail shop "Gallagher's Arcade" offered a treasure trove of women's fashion:

"Mrs T F Gallagher's "Great Arcade," Church-street, Parramatta, is at present one of the attractions in the business part of dear old, fascinating, faulty Parramatta" (advert Cumberland Mercury, 14 Oct 1983).

These facts are important because it is not a speculative build, Willow Grove was an architecturally designed family home. As an architect, Sydney Moore Green was involved with Sydney Hospital, the Great Synagogue and Royal Arcade. He was later assistant Government Architect of NSW. The building has historical association with the Gallaghers, important local retailers and identities in the Parramatta community.

St George's Terrace

The facts surrounding the history and significance of St George's Terrace in the Heritage Impact Statement are not disputed. The assessment of significance should note that as a style of housing the historic terrace row is now extremely rare in Parramatta, and St George's Terrace may be the last surviving example of this type from the 19th century in Parramatta.

iv. Consideration of alternatives

The Secretary's Environmental Assessment Requirements (SEARS) for this State Significant Development (SSD) 10416, required a social impact assessment which "considers all remaining feasible alternatives and comparatively analyses their respective social impacts and benefits."

The Environmental Impact Statement's response to this requirement was to provide three options – Option 1 - A 'do nothing' option



Option 2 – An alternative location

Option 3 – The 'Powerhouse' Parramatta project

While option 2 purports to provide and discuss "an alternate location", it does not provide such an alternate location, but simply argues for Option 3 -

"The riverside site has been found to be the best and most appropriate location for the delivery of the Powerhouse Parramatta both at a regional and local scale and was ultimately selected as the favoured location with the NSW Government announcing its acquisition from City of Parramatta Council in April 2016."

The Environmental Impact Statement does not address the requirement in the Secretary's Environmental Assessment Requirements to consider alternate sites for the project.

The Statement of Heritage Impact states:

"It is considered that no alternative schemes were considered during the design process which could have retained the "Willow Grove (and potential archaeological site)" and the "St George's Terrace (and potential archaeological site)". For further detail, refer to the *Design Excellence Report* 13 which addresses SEARs Issue No. 3" (p.78)

In fact, four alternative schemes were considered, one of which conserved both Willow Grove and St George's Terrace, and another conserving just St George's Terrace. These options are summarised in Attachment 1.

A two-stage competition process was chosen with a first stage open Expression of Interest (EOI) process followed by a shortlist of entrants invited to participate in Stage 2 and respond to a detailed brief. The submissions in Attachment 1 were the finalists in Stage 2 of the Design Excellence Competition. The entries in Stage 2 responded to a detailed brief which included this direction:

"To enable the best Museum outcome and support the Civic Link we are requesting that all submissions consider the removal of Willow Grove, should it be required" (p.128)

However the concept for the Civic Link prepared for and adopted by Parramatta Council stated that: "The strength of the design concept is the continuous green spine that runs between the River Square and Parramatta Square, and allows the character, activation and design of the spaces to reflect the changing nature of the city along its length. Pedestrian movements are prioritised and cyclists are welcome, as the Link connects into the existing hierarchy of streets, spaces and modes of public transport offered through the CBD."

The critical connection between the Civic Link and River Precinct in the concept incorporated Willow Grove and its landscape setting. It only became desirable to remove Willow Grove when the government found it was not financially feasible to buy the GE Building on Phillip Street. The decision to identify Willow Grove as expendable in the design brief was not with the objective of Design Excellence but of perceived financial necessity.

The jury's comments regarding the adaptive reuse of the heritage items by the Steven Holl Architects (United States) and Conrad Gargett (Australia) submission were concerning. They stated:



"the proposed use of these buildings as dining and food facilities was incompatible with any potential argument for retention"

This comment is made without any assessment of the heritage impact of the proposed use and is not aligned with The *Design Guide for Heritage* prepared by the NSW Government Architect's Office which states:

"Adaptive re-use gives new life to a site by designing sympathetic alterations and additions that enable the site to accommodate compatible new uses and functions, while maintaining the heritage significance, and communicating it to new generations of users." (p. 17).

The 'do nothing' option

The Advisian Statement of Heritage Impact states:

"The 'do nothing' approach would not facilitate the delivery of the winning design, as selected in the Powerhouse Precinct at Parramatta International Design Competition, at the site. In addition, it is considered that the 'do nothing' approach would not align with key NSW Government strategies including the Greater Sydney Region Plan, the Central City District Plan and the Cultural Infrastructure Plan 2025." (p.78)

This reference to alignment with key NSW strategies takes a particularly insular view of Sydney. In fact, the greater Sydney Region Plan is called *A Metropolis of Three Cities*.

"A Metropolis of Three Cities provides the spatial foundation for more effective and efficient planning for city-shaping infrastructure and enhanced utilisation of infrastructure. The three-city metropolis vision moves away from the historical radial focus on the Eastern Harbour City to a new focus requiring more interconnections within each city and between the three cities. This will facilitate greater opportunities for learning, labour participation, industry growth and development, and access to housing and services across Greater Sydney and create a 30-minute city. This critical spatial shift will transform future infrastructure plans by providing a specific approach to the infrastructure needs, timing and response required for each city. While each of the three cities will require new infrastructure, the focus will vary according to:

- existing infrastructure and services, capacity and industry and housing activity
- existing levels of committed investment
- the time scale of development." (GSC, A Metropolis of Three Cities p. 35)

The creation of a new iconic 'museum' on the cutting edge of research, science and innovation should not mean that an existing and highly valued institution should close. The Greater Sydney Region Plan is called *A Metropolis of Three Cities*. Growing populations will require more such institutions, not fewer across wider Sydney. The Greater Sydney Region Plan identifies the need for more infrastructure and improved amenity in the Central River City; and improved liveability and sustainability in the Eastern Harbour City.

The 30 minute city promises increased 30-minute access to a metropolitan centre or cluster. These centres are places where people live, learn, work and play. Both Ultimo and Parramatta need cultural



institutions to inspire and educate current and future generations, and to act as a catalyst for innovation and employment in their metropolitan centres. These institutions can both be part of the Museum of Applied Arts and Sciences, growing the historic legacy of the Technological Museum.

In the state infrastructure strategy 2014, the Powerhouse Museum was identified as one of several state cultural assets that needed renewal to bring these assets up to national and international standards. The others includes: the Opera House, the State Art Gallery, The Australian Museum and the State Library of NSW. The Powerhouse Museum was the only property on the list not state heritage listed.

Lisa Havilah, Chief Executive – Museum of Applied Arts and Sciences is quoted as saying that "A museum is no longer a group of static permanent exhibitions for the purpose of education or a place that's just a repository for collections...It needs to have dynamic, changing programs with multiple pathways for communities and audiences to engage with ideas, to reflect history in dynamic ways. And it needs to give people experiences that impact on their lives." (Australian Financial Review Magazine, Lisa Havilah's ambitious plans for Sydney's Powerhouse Museum 30 Jan 2020).

Sydney's actual Powerhouse Museum has done this for over 30 years. The limitation on the provision of impactful and engaging exhibitions is budget. This constraint is not alleviated by moving the museum to Parramatta or the substantial cross subsidies of onsite commercial ventures. The recently highlighted voluntary administration of Carriageworks during COVID has demonstrated that a commercial model for a cultural institution in Sydney is not necessarily financially resilient.

"What is a museum?" has a very flexible definition. "What is the Museum of Applied Arts and Sciences?" is not. The visionary, creator and curator of the original Technological and Sanitary Museum, the progenitor of the Museum of Applied Arts and Sciences, was Archibald Liversidge.

In 1880, Liversidge presented a report to the trustees of the Australia Museum entitled 'Report upon Certain Museums for Technology, Science and Art' to the Minister for Public Instruction. The document was divided into two major themes: 'Museums' and 'Scientific and Technical Instruction'. The report reviewed information on the collections, organisational principles and programs of study at some of the principal museums and technical institutions in Great Britain and Europe. The report provided a framework for a technological museum that would be more than just a collection of objects; instead, select specimens would illustrate the stages of manufacture from raw material to final product. The vision was for the museum to be a place to generate and apply new knowledge.

The museum, as it is today, is not just a local museum for TAFE Ultimo, UTS and the University of Sydney it is also an accessible cultural institution for people from all over Sydney and the regions. The close proximity and general walking distance from Central Station makes the museum accessible for people from the Sydney Metropolitan Area and beyond.

Right from the earliest beginning the MAAS has strived to present objects with information, to educate and to spark debate. It has always been much more than "static permanent exhibitions".

The 'do nothing' approach achieves the objectives of the Museum of Applied Arts and Sciences Act but also the want of the visionary creators of a museum of science and art in Sydney.



v. Burra Charter

The SEARs required a Statement of Heritage Impact (SoHI), prepared by a suitably qualified heritage consultant in accordance with the guidelines in the *NSW Heritage Manual*. The SoHI included tables assessing the proposal against the relevant guidelines. Table 4 shows the assessment of the proposal against the *Burra Charter* article and definitions relating to conservation and demolition.

Overall, the assessment found non-compliance with the *Burra Charter's* principles.

Table 4: review of the SOHI assessment against the principles of the Burra Charter

Burra Charter	Advisian response	National Trust's comments
4.1 Conservation should make use of all knowledge, skills and disciplines which can contribute to the study and care of the place.	The EIS for the proposal will be informed by the recommendations of this SoHI in relation to the salvage, archiving, re-use and/or interpretation of significant fabric.	The Burra Charter definition of conservation is: Conservation means all the processes of looking after a place so as to retain its cultural significance. Article 14 of the charter states: Conservation processes Conservation may, according to circumstance, include the processes of: retention or reintroduction of a use; retention of associations and meanings; maintenance, preservation, restoration, reconstruction, adaptation and interpretation; and will commonly include a combination of more than one of these. Conservation may also include retention of the contribution that related places and related objects make to the cultural significance of a place. Keeping a handful of objects after the demolition a heritage place is not conservation, it is tokenism.
Conservation requires the retention of an appropriate setting. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place. New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate.	The demolition of the "Willow Grove (and potential archaeological site)" and the "St George's Terrace (and potential archaeological site)" would result in the total loss of significant fabric and the visual setting at these heritage items. However, the proposal would ultimately integrate with the future Parramatta Civic Link (refer to Section 9.3). In addition, it would link historical and contemporary places through the salvage, archiving, reuse and/or interpretation of significant fabric from demolished heritage items. This would contribute to the cultural significance of the place. Finally, given the distance between the proposal and heritage items located in the vicinity of the site, as well as the location and scale of existing intervening developments, it is considered that an appropriate setting would be retained.	The setting should refer to the setting of the heritage item not INSW and DPIE's desired future character of Parramatta CBD. Demolition as stated in Article 8 is not appropriate. As stated in response to 4.1, demolition and token interpretation is not conservation and definitely does not contribute to the cultural significance of the demolished item.
15.1 Change may be necessary to retain cultural significance, but is undesirable where it reduces cultural significance. The amount of change to a place and its use should be guided by the cultural	Refer to Article 8 .	As stated in Article 8: Demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate.



Burra Charter	Advisian response	National Trust's comments
significance of the place and its appropriate interpretation.		
15.3 Demolition of significant fabric of a place is generally not acceptable. However, in some cases minor demolition may be appropriate as part of conservation. Removed significant fabric should be reinstated when circumstances permit.	Demolition of the "Willow Grove (and potential archaeological site)" and the "St George's Terrace (and potential archaeological site)" would be required to fulfil the vision and functional requirements of the proposal. Removed significant fabric would be salvaged, archived, re-used and/or interpreted.	The Burra Charter states minor demolition may be appropriate. Razing two heritage items is not minor. The fact the proposal requires demolition "to meet its vision" does not justify the demolition of heritage places on heritage grounds.

3. Impact of the relocation of key museum objects

The Trust has concerns about the future of the objects currently located at the Ultimo Powerhouse Museum. As stated previously, these comments are based on the documents and proposals as exhibited. It is acknowledged that some of these concerns have been allayed by the decision to retain the Ultimo Powerhouse Museum.

The Boulton and Watt Beam Engine is the oldest remaining rotative engine in the world. It is essential to the long term maintenance of the engine, and the other steam engines operating at the Powerhouse Museum, that they are run by steam.

The suggested alternative operation by compressed air or by using an electric motor is not an option. The Boulton and Watt Beam Engine and other steam engines were made to be run on steam. The steam and heat expand the metal, seal joints and keep lubricants viscous. Care was taken during development of the current exhibits at Ultimo to ensure engines were operated by steam only, as alternatives would likely cause irreparable damage.

Powering the engines by compressed air would cool metal and joints would remain open or shrink rather than seal. This would risk metal failure, cracks forming and permanent fabric damage occurring. The use of an electric motor could risk differential hot and cold spots exacerbating wear and fatigue.

The ephemeral nature of the exhibitions at the proposed new Parramatta museum would see other objects placed into long-term storage, whilst plans have been made to lend some of the very large objects to regional museums, such as the Locomotive No. 1 being relocated to the NSW Rail Museum at Thirlmere. The Trust is concerned about the resourcing of some regional museums and their ability to maintain and conserve these highly significant objects. The Trust in a survey conducted in May 2020 found that 56.48% of respondents were very unlikely to visit the Museums Discovery Centre in Castle Hill and 60.67% were very unlikely to visit the NSW Rail Museum in Thirlmere. Of the 1320 respondents, 98.6% thought the Powerhouse Museum and its collection should stay in Ultimo. The full report on the results of the National Trust Survey can be seen at **Attachment 2**.



4. Context of the design

The MAAS New Museum Parramatta Design Excellence Strategy (4 December 2018 Create NSW) states:

"The New Museum is likely to be a state significant development under the provisions of State Environmental Planning Policy (State and Regional Development) 2011. As such guidelines including Better Placed, Government Architect NSW, 2017 are likely to be invoked and should inform the achievement of design excellence for the New Museum. Under Better Placed, the following 'Good Design' objectives are relevant:

Better Fit- contextual local and of its place" (p.5)

Objective 1 of the design objectives for NSW in the publication *Good Design* is better fit.

That is:

"Good design in the built environment is informed by and derived from its location, context and social setting. It is place-based and relevant to and resonant with local character, heritage and communal aspirations. It also contributes to evolving and future character and setting."

The information provided about the winning entry provides little information about context. The jury's assessment states:

"In response to initial engagement undertaken with the Powerhouse and the local Indigenous communities, the design proposes to include Indigenous elements with a specific focus on teaching and learning, celebrating the sophistication of Indigenous knowledge from this place, through time. The team demonstrated a strong understanding and willingness to engage with local Indigenous communities to further enrich the project throughout the next stages of the design process.

The design is "One that responds to the urban context of the city and the more natural setting of the Parramatta River""

The *Design Excellence Guidelines* state "Good building design should positively contribute to the overall architectural quality of the city and provide buildings appropriate to their context. In some circumstances, this contribution may be as an iconic or landmark building, but more typically it is as a well-designed building that fits sensitively into the streetscape".

The contextual response of this building to the local area is not explained or immediately evident. How this building is referenced by the 'DNA' of Parramatta, the nuanced nods to the existing character, is also elusive.

The engagement with the local indigenous community is commended. Yet, the design outcome of the engagement at this stage is not apparent. As stated in the *Design Excellence Report*:

"The winning design will reflect and engage with the multiple histories of the site including its Indigenous histories. These histories will be considered and interpreted throughout the next stage of the design process." (p.18)

The design is described as challenging "the museum paradigm, by proposing a 'hyper platform' with limitless and timeless potential." At the Ultimo Power House this multifunction space was described as a shell.



While the inspiration for the lattices remains elusive what is clear is this is not a building that sits sensitively into the landscape. The scale of the building, like that of its neighbour, diminishes the significance of the Parramatta River, little more than a creek next to these towers.

4.0 Conclusion

The National Trust objects to the proposed Powerhouse Parramatta (SSD-10416) and particularly strongly objects to the demolition of heritage items Willow Grove and St George's Terrace. The Trust welcomes the 4 July 2020 NSW Government announcement on the future of the Ultimo Powerhouse Museum: -

On 4 July, 2020, the NSW Government announced that it would "retain the Ultimo museum", stating "Sydney's Powerhouse Museum at Ultimo will continue to welcome visitors to its renowned exhibits, with the NSW Government today announcing it will remain open". The NSW Treasurer the Hon. Dominic Perrottet said the existing museum at Ultimo would provide "a jobs boost and support to the arts community, which has been hit particularly hard by the COVID-19 pandemic."

The announcement also stated "The government will explore if some of the funds earmarked for relocation costs could be used on renovations."

Yours sincerely,

Andreana Kennedy

Conservation Manager



Attachment 1: summary of submission entries

Five competition submission entries

Submission	Willow Grove	St George's Terrace	Design assessment	Adaptive reuse	Context
AL_A (UK) and Architectus (Australia)	Demolished	Demolished	The jury praised the approach to lift the museum off the ground and leave an open public space below with retail, dining and bars well outside of the flood risk. The design allowed for a strong civic connection from Parramatta Station to the water. It also admired the drama and presence of the main presentation space. But the jury had concerns about the building's circulation. Its facade, though poetic, presented as a large block to the city and offered large expanses of glass on the riverfront exposing the building to solar heat gain	NA	"as alive and vibrant as the Lanes on a festival day and as full of energy and anticipation as an Eels match". "That is why we are putting public spaces first — making the river bank a place of convening, letting the city flow below the buildings and up into the museum, creating laneways in the sky" "The milky white facade reflects the weather and ripples like the river. The stringybark timber soffits, triangulated in form, reference the traditional Nowi canoe and make the precinct a warm and inviting place to be."
Bernardes Architecture (Brazil) and Scale Architecture (Australia)	Demolished	Retained	The Jury praised the team's application of these Brazilian-influenced approaches to landscape; however, there was some scepticism about their applicability, given the Australian, and in particular, the Parramatta climate. Elegant and simple" design with generous presentation and back-of-house spaces"	St George's Terrace to be used as concierge and as retail.	The jury stated the facade was not conceived in response to the site, and the design lacked specific inspirations that related to the site, its culture and people. The façade was judged as failing to convey a sense of Parramatta's DNA The proposal had some gestures towards understanding and engaging with Indigenous communities, but noted that this needed further development.
Chrofi (Australia) with Reko Rennie (Australia)	Demolished	Demolished	The museum became defined as three separate buildings as opposed to an integrated site. The Jury also considered that the interstitial spaces between each of these three buildings required further refinement and thought. Overall, the judges found there was a lack of green space, planting and shading, and an overreliance on water elements to provide environmental protection. The jury was concerned about plans to build a basement in the flood plain.	NA	Jury responded well to the proposal's integration with the Parramatta cityscape; the tower blended well into the surroundings, and freed up space on the river front, allowing the site to breathe. Concerns about the integration of art within the design. Whilst the thought and inspiration behind this was appreciated, the vision was very singular, expressing one artist's perspective, and lacked engagement with the local communities.



Submission	Willow Grove	St George's Terrace	Design assessment	Adaptive reuse	Context
Steven Holl Architects (United States) and Conrad Gargett (Australia)	Retained	Retained	Praised the scheme's generosity in its provision of public realm. Whilst the underlying design approach was admired, the Jury considered that the resultant building was ultimately incompatible with the site and the requirements for the Powerhouse in Parramatta. The height and scale of the building, whilst considered to be inkeeping with the general future direction of the Parramatta cityscape, was too dominant within the site and its context Juxtaposition of the very large museum building and the smaller heritage was considered jarring. The result of retaining Willow Grove was considered particularly problematic as the building interrupts the Civic Link, blocking the direct connection of the city and the river-structures.	Food and beverage facilities Jury: the proposed use of these buildings as dining and food facilities was incompatible with any potential argument for retention	The main presentation space has an expressed structure inspired by the Mandjabu; beautiful anthropomorphic traps made by Aboriginal peoples. We acknowledge the complex understanding of the cosmos that Indigenous people established. Our homage to their skills and knowledge is represented in the tower form tilted at 23½ degrees, same as the earth's axis. Reflected in the Parramatta River, this tilt is reversed linking the sky to the earth. Our zinc façades (analogy to eels' scales of the Parramatta River)



Submission	Willow Grove	St George's Terrace	Design assessment	Adaptive reuse	Context
Moreau Kusunoki (France) and Genton (Australia)	Demolished	Demolished	"Built form will tread lightly on the site" architect quote. The Powerhouse will transcend scale to exist simultaneously as both intimate and iconic. Jury: The Jury was unanimous in their decision and commended the proposal for its elegant design and strong identity. The Jury commented that the generosity of space, transparency and lightness of the structure will create a 'sense of joy' that	NA	In response to initial engagement undertaken with the Powerhouse and the local Indigenous communities, the design proposes to include Indigenous elements with a specific focus on teaching and learning, celebrating the sophistication of Indigenous knowledge from this place, through time. The team demonstrated a strong understanding and willingness to engage with local Indigenous communities to further enrich the project throughout the next stages of the design process.
			encapsulates the ambitions of Powerhouse Parramatta The public realm was considered to be generous and welcoming, with the potential to develop into an exceptional open space for Parramatta, incorporating a clear continuation of the civic link and connecting the city and the river.		One that responds to the urban context of the city and the more natural setting of the Parramatta River. Dirrabarri Lane positioned at the western edge of Powerhouse Parramatta, supports the establishment of a network of laneways and public spaces which stitch Powerhouse Parramatta into the surrounding urban fine grain.