

28 June 2021

Mr Jim Betts
Secretary,
NSW Department of Planning, Industry and Environment,
Locked Bag 5022

By email (c/o): marcus.jennejohn@planning.nsw.gov.au

Dear Mr Betts,

National Trust concerns regarding Willow Grove

Under the most recent proposals for the new Parramatta Powerhouse Museum, the NSW Government has proposed to “dismantle and relocate” Willow Grove to an undisclosed location in North Parramatta, and “retain and preserve” St George’s Terrace.

A Relocation Framework and Methodology Plan (RFMP) has recently been prepared for Willow Grove, as required in the Conditions of Consent for this project. This document contains no architectural or measured drawings; no annotated photographs; no clear scope, schedules or methodology; and displays a complete lack of understanding of how a Victorian-era building such as Willow Grove was put together, let alone an understanding of how to pull it apart.

The National Trust are of the opinion that the *Relocation Framework and Methodology Plan for the Site Selection, Deconstruction and Relocation of Willow Grove prepared for Infrastructure NSW (June 2021)* is not adequate either for the task or to meet the requirements of the conditions of consent for this project.

Background

Willow Grove was listed on the National Trust Register in 1985 and St Georges Terrace was listed on the Trust Register in 1984. Both are listed on the Parramatta Local Environmental Plan 2011. Willow Grove is significant as being a rare survivor of high Victorian residential development in this area of Parramatta, while St Georges is the only such terrace in Parramatta.

The National Trust have long advocated that both Willow Grove and St Georges Terrace must be retained and featured in any new museum development proposal in a meaningful way, such as occurred at the Museum of Sydney site, and the original Powerhouse Museum. The current proposal does not achieve this.

The “relocation” of Willow Grove and partial retention of St George’s Terrace represent the very worst of contemporary attitudes and responses to heritage - devoid of meaning, the remaining terraces will look simply like a historical imposition rather than a celebration of Parramatta’s heritage, and a fake Willow Grove will detract from the existing cultural significance of any new location in historic North Parramatta.

In heritage terms, the proposal to rebuild a fake version of Willow Grove in an entirely new location is in fact a far worse option than straightforward demolition. The amount of money being diverted from other worthwhile heritage projects around NSW to achieve this pathetic outcome is deeply saddening.



Consent Requirements

Under Part B2 of the Development Consent for Powerhouse Parramatta (SSD 10416, 11 February 2021), very clear parameters were set out regarding the “Deconstruction and Relocation of Willow Grove” (with bold text by National Trust):

*No work shall commence on the deconstruction of Willow Grove until a **detailed** Relocation Framework and Methodology Plan (RFMP) for the site selection, deconstruction and relocation of Willow Grove is prepared by the Applicant and submitted to and approved by the Planning Secretary. The RFMP must include (but shall not be limited to):*

- a) a **detailed** outline of the site selection process, development approvals pathways and consultation that will be undertaken to determine a new site for Willow Grove, including the Phillip Street front fence;*
- b) **detailed** engineering and heritage assessment(s) to determine the methodology for the deconstruction and relocation process, with input from a suitably qualified heritage specialist and/or a heritage engineer for sensitive demolition and relocation works and with reference to the Willow Grove Conservation Management Plan and the Addendum Statement of Heritage Impact prepared by Advisian (October 2020);*
- c) **detailed** consideration of the impact and mitigation measures required to avoid and minimise impacts of the deconstruction and relocation process of heritage fabric;*
- d) **details** regarding the storage of the retained fabric;*
- e) details of the engagement of a **suitably qualified heritage specialist** to oversee the deconstruction, relocation and reconstruction of Willow Grove. The heritage specialist shall be retained for the duration of the works and shall not be changed without prior written notice and approval of the Planning Secretary.*

The *Relocation Framework and Methodology Plan for the Site Selection, Deconstruction and Relocation of Willow Grove* (8 June 2021) prepared for Infrastructure NSW by Advisian does not, in the opinion of the National Trust, satisfy the above requirements.

The National Trust raise the following key concerns relating to this document:

(a) Site Selection Process

The location for any relocated building has not been determined. The RFMP is focused on “retaining (the) heritage significance and allow for appropriate adaptive re-use” of Willow Grove itself. Given that any “relocated” building will have suffered catastrophic damage, be mostly newly-built materials, and will not be located in its original riverside location, this focus is of little consequence.

The report does note that Willow Grove should have a “sympathetic relationship” with any existing buildings, structures and spaces on any relocated site, but this needs to be a far more considered element of any process. Indeed, in heritage terms, this must be the sole criteria.

National Trust position: The major consideration for any relocated building must be that it does not diminish the cultural significance of any other site particularly the potentially World Heritage significance of the Parramatta Female Factory site.

(b) Methodology for deconstruction and relocation

The National Trust have major concerns over the inadequacy of this report with regard to any proposed methodology for deconstruction and relocation. We have made enquiries and have had no confirmation that an architect with heritage expertise has been involved in this document. Indeed, from our own research the report has been authored by a consultant at Advisian whose background is in Chemical Engineering, and supervised by an Environmental Planner. This is totally unacceptable.



The only people qualified to prepare such a methodology would be a registered architect, structural engineer, and builder – all with extensive, practical, experience in historic buildings of this era, and specific experience with the types of fabric (building materials) used at Willow Grove.

The methodology for deconstruction and relocation is arguably the most important part of this document, however **Section 3.2 (Methodology for deconstruction) in the RFMP is not even two pages long!**

The equally complex task of relocating and reconstructing the building covered in **Section 3.3 (Methodology for relocation and reconstruction) is not even one page in length!**

That the Planning Secretary deems this to be an acceptable level of documentation for what would arguably be one of the most complex heritage “deconstruction and reconstruction” operations ever conducted in NSW and for one of the most controversial public projects in recent times is extraordinary. The general consumer would expect (and receive) a greater level of documentation for a simple bathroom or kitchen renovation project in a suburban house. The acceptance of this document as anywhere remotely near adequate for the complexity of this task is an overwhelmingly clear indication of the “tick box” approach that has been taken with the heritage approval of this project.

The methodology is so unsatisfactory that it is not even worth commenting on, however we note the following particular examples:

- It involves such things as undertaking a BIM survey “to inform decision making,” indicating that no actual measured drawings have even been prepared to inform or describe the methodology presented.
- It suggests “paint testing to identify potential for lead contamination” but with no consideration of investigating actual colour schemes.
- It helpfully suggests that a contractor “install and move scaffolding around the building during the deconstruction works” but offers no advice on how to support structural elements.
- It refers to the dismantled segments “cut (sic) iron lacing” of the front cast iron palisade fence.
- It simply states the deconstruction works as “label and dismantle doors, ceilings and windows, and store on timber pallets”. How exactly you dismantle an entire lath and plaster ceiling and store it on a timber pallet is not explained.
- It suggests the “original timber floors would be removed via separation of floorboards from the floor structure” yet states that “the floating laminate floor kept in place to provide protection to the original timbers floors.” How you keep a floating floor in place after you have removed the floor and structure under it is not made clear. The consultants do not consider the original nails in any discussion.
- It notes that “mortar between the bricks is likely lime-based” – indicating that no tests have been conducted – and that this would be expected to enable relatively easier deconstruction of masonry.” This a rather large assumption for a deconstruction methodology for a masonry building, and does not stipulate whether walls are to be dismantled in sections, or brick-by-brick. It seems also to completely ignore the internal and external plaster wall linings.
- It notes (3.4.2.5) that “decorative and plain archways would be removed, stored and reused”

Reading through this document, it is clear that it has been written by a consultant with absolutely no practical building knowledge, let alone the specific knowledge relating to the construction of old buildings that a project of this type would demand. Indeed, Policy 19 of the 2017 CMP (referred to by Advisian on page 10 of the RFMP as a key document they have referred to) makes clear the need for such expertise:

POLICY 19: Only qualified persons who are versed in working with on historical building of this era of the Victorian period, understanding the traditional building techniques utilised in the construction of the building (load bearing masonry walls) shall be employed and supervised by a qualified heritage consultant/architect. This policy specifically applies to with rendered masonry facades, steel framed verandah posts, frieze and fringe, timber windows, timber French doors, Stone fence, Stone capping and the possibility of timber floor boards below the laminate covering.



National Trust maintain that any methodology for deconstruction and relocation is essentially a stand-alone architectural project and must include (but not be limited to):

- Evidence of detailed prior investigation of built and decorative fabric to inform deconstruction and reconstruction method;
- Measured drawings noting elements to be retained and conserved;
- A full schedule and specification for the demolition works outlining scope and detailed methodology;
- Detailed engineering input;
- Input from suitably qualified and experienced heritage architects, engineers and builders.

The RFMP also notes (p.21) that “reconstruction works would need to be compliant with any Australian Codes or Australian Standards (AS) which may be specified by the relevant Regulator” including the National Construction Code and relevant Australian Standards. How exactly this will impact the design and construction of what has been promoted as a “faithful recreation” of Willow Grove (given the numerous design and construction issues inherent in any old building, in particular one with no disabled access to its upper floor) has not been addressed in this report.

It is also important to note that the Conservation Management Plan (FORM Architects, June 2017) referred to in the Conditions of Consent (and referenced in the RFMP) was prepared for Parramatta City Council, and never considered that the building would be demolished, let alone “re-erected” on another site. This is clear in a number of its conservation policies, notably Policy 11 which states that the streetscape character of Willow Grove should be retained and that “*Future change should ensure the relationship to the streetscape context is retained with minimal interruptions, in particular the front façade presenting to Phillip Street.*” To argue that this CMP is informing the current proposal is an insult to its authors.

*National Trust position: The Methodology for deconstruction and relocation in the RFMP is **totally inadequate** and does not meet the condition of consent B2(b) because it does not actually determine the methodology for the deconstruction and relocation process and does not appear to have had the required input from a **suitably qualified** heritage specialist.*

(c) Impacts and mitigation measures

As with the methodology component of this document, the section outlining the mitigation methods to minimize damage to fabric is woefully lacking in detail and once again comprises a single table spread over two pages. The mitigation measures proposed in many cases do not actually address the issues noted, and in some cases actually highlight the inadequacy of the RFMP document itself, for example (Table 4.1):

Impact	Cause	Mitigation Measure
Damage to significant fabric during deconstruction	Incorrect deconstruction methodology for masonry leading to cracking, spalling or splitting.	The appointed contractor will be briefed on the heritage significance of Willow Grove prior to the commencement of deconstruction works.

Briefing a contractor on the significance of Willow Grove before they demolish it hardly seems to be a worthwhile “mitigation measure,” and surely the aim of the RFMP must be to ensure there is a correct (as far as possible) deconstruction methodology – not be an identified cause for damage to fabric!

National Trust position: The mitigation measures proposed, aside from the requirement to have suitably qualified and experienced construction personnel undertake the works, are not sufficient to ensure that the actual built fabric of Willow Grove would actually be protected. Given that this retention of fabric is seemingly the only reason to undertake this work (noting that the bulk of the actual cultural significance of Willow Grove is associated with its existing location and riverside setting) this would result in making a very poor heritage outcome even worse.



(d) Project oversight

The RFMP notes (p.25) that Infrastructure NSW has engaged Advisian as Heritage Specialist for the duration of the works and that “the principal member from Advisian to be responsible for project oversight holds relevant qualifications and experience in heritage conservation.”

The National Trust has enquired with Advisian whether a registered architect oversaw the preparation of the RFMP or will be overseeing the work, and this could not be confirmed. A quick search of the term “heritage” on the global Advisian website (<https://www.advisian.com/en>) yielded zero results.

*National Trust position: The relevant qualifications and experience of the individual and indeed the company engaged to oversee the deconstruction, relocation and reconstruction of Willow Grove need to be established. This is a highly complex project and there needs to be evidence that a **suitably qualified heritage specialist with experience in the conservation and repair of historic buildings** is engaged to meet the requirements of this condition of consent.*

Conclusion

The proposal to “relocate” Willow Grove has been identified as being poor heritage practice. The National Trust take the following position on Willow Grove:

- Willow Grove should remain in its original position, and be sensitively repaired. It could form part of a new museum.
- The proposal is a form of demolition, not relocation. The process of dismantling will destroy much of the original fabric. Any attempt to dismantle these materials could easily result in their catastrophic failure.
- Any “moved” building will of necessity comprise mostly of new materials. The relocated building would thus be a new building, with perhaps some old verandahs and doors attached. This level of fabric replacement is not good heritage practice and is not in accordance with industry best practice including the ICOMOS Burra Charter.
- Moving Willow Grove from its present site will reduce its cultural and historic significance, and its relocation will negatively impact the significance of any new location in historic North Parramatta.
- The costs associated with such a proposal will be considerable, and will bring little to no benefit to the heritage and people of Parramatta.

With each iteration, this project is becoming possibly the worst example of the deficiencies in the process, management and care of heritage in NSW – and all to facilitate a museum which should celebrate such things.

The Relocation Framework and Methodology Plan, in the opinion of the National Trust, does not meet the requirements for such a document as outlined in the Conditions of Consent for this project.

A new document by a team of suitably qualified heritage specialists must be prepared, and assurance must be given that suitably qualified and experienced people are involved for the duration of the works.

Yours sincerely,

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Cc:

The Hon. Rob Stokes MP, Minister for Planning and Public Spaces

The Hon. Don Harwin MLC, Minister for the Arts

Alex O'Mara, Group Deputy Secretary of Place, Design and Public Spaces

Pauline McKenzie, Executive Director Heritage NSW