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SUBMISSION FROM DHARUG STRATEGIC MANAGEMENT GROUP LTD

Response to Submissions: Powerhouse Parramatta

Environmental Impact Statement

Dharug Strategic Management Group Ltd (DSMG) made a submission to the original exhibition of the EIS in which we made it clear that while we value our relationship with the Museum of Applied Arts and Sciences and will welcome the development of an appropriate new facility in Parramatta, we were deeply concerned that the project under review is not appropriate to the site, nor is its appalling treatment of existing heritage and community values a foundation for developing a major community cultural institution in and for Western Sydney. In reviewing the Response to Submissions Report on the project, our concerns about the project as proposed are amplified rather than addressed.

As indicated in our original submission on this project, DSMG is a not-for-profit company and registered charity that operates as an organisation for Dharug people, managed by Dharug people. DSMG was established in early-2018 after more than seven years of community consultation and negotiation about management of the site of the Blacktown Native Institution in Oakhurst in Western Sydney. The BNI site has cultural and historical significance for Dharug people and its return to Dharug ownership in 2018 was the first return of Nura to Dharug care since colonial times.

DSMG and MAAS

We reiterate that we understand the basis of our contribution to the review of the Powerhouse at Parramatta proposal is developed from the 2020 Statement of Recognition and Understanding between DSMG and MAAS.

Failure to acknowledge the underlying issue – this is the wrong project for the site

As a community organisation, DSMG expresses exasperation that the *Response to Submissions Report* fails to address the fundamental underlying issues that were raised not only in our submission but in other community submissions that the proposed development is deeply conceptually flawed as a development of a cultural institution at this place.

Instead, the *Response to Submissions Report* assumes that the Department of Planning, Industry and Environment should – and will – approve the development as proposed and amended, even if conditions are required. We think it cannot be approved and that objective assessment of the EIS and this *Response to Submissions Report* supports that conclusions.



DSMG acknowledges that some changes to the proposal have been made with a view to reducing impacts, but the fundamental mismatch between proposal and place remains unacknowledged and unaddressed. The report is simply silent on the foolishness of a project design for a cultural institution that requires destruction of cultural heritage to proceed.

Given the clear contradiction between the intended purpose of developing a Powerhouse at Parramatta museum and the project as proposed and given that so many submissions made community concern about that contradiction explicit, it is surely incumbent on the consultants to at least acknowledge that concern as reflecting a fundamental mismatch between the project and the place.

DSMG's understanding is that in responding to the EIS and the *Response to Submissions Report*, that we are involved in an assessment exercise, not a pre-determined approval process. In reviewing the *Response to Submissions Report*, however, it seems that the consultants and the project developers all assume that this is a exercise of project advocacy not assessment. They fail to address the fundamental criticism of the EIS to consider either a 'no development' option or to report on alternatives.

The building design was always wrong

Amendment to the building design to respond to issues concerning relationships between the building, the site, the new institution and the place in which it will sit is, in part, an acknowledgement that the original design – despite all the accolades for its international excellence – failed the requirement to be locally excellent and locally relevant. The requirement to demolish in situ heritage values demonstrates this. The proposed retention of St Georges Terrace demonstrates that reformulation of the project to accommodate existing cultural heritage was always possible – so the failure to consider redesign that retains Willow Grove in situ simply reinforces the poverty of understanding of the site and its place in Parramatta in the original design.

If 91% of submissions commented on the loss of heritage demanded by the original design, surely that is an indication that the design was wrong from the start. The project advocates (including the consultants preparing the *Response to Submissions Report*) are simply trying to fool the State and the public by insisting that their view that "The subject site is the most suitable location for the Powerhouse Parramatta" (*Response to Submissions Report*, p 9) means the design is the most suitable design. Similarly, the further desperate insistence that the

two-stage international design competition, in which the competition brief requested that design teams consider aspects of heritage and cultural significance within their submissions, including local heritage items, whilst achieving the functional brief required to be delivered on this important site. The retention of heritage was considered carefully during the judging process, and ultimately the Jury were unanimous in their decision on the final chosen concept by Moreau Kusunoki and Genton (Response to Submissions Report , p9),

excuses the destruction of cultural heritage values on the site is self-justified delusion that is out of step with community values and inconsistent with the usual standards of good practice impact assessment.



The design criteria treated the Dharug storying of the site as irrelevant and this meant that only two of the original design teams approached Dharug organisations to better understand the cultural heritage and place value of the site. The jurists, like the design team at Moreau Kusunoski and Genton, were simply ignorant and the refusal to address that ignorance is part of the reimposition of *terra nullius* thinking into the urban fabric of Parramatta. The complete and abysmal failure of the consultants and proponents to understand this is an amplification of ignorance and a wilful refusal to reconsider how to build a respectful cultural institution in the heart of Parramatta. It invents rather than respects heritage.

This wilful and destructive ignorance must be called out if the review of this proposal is to deliver a critical and objective assessment rather than simply a pre-determined approval. We note that not even all the shortlisted proposals concluded that destruction of existing heritage values in the site was required to meet the competition criteria, so the failure of the EIS or the *Response to Submissions Report* to consider appropriate alternative to the element of the project that elicited the most clear and coherent criticism is a major failure of good practice.

This is classified as a State Significant Project, yet its pre-determination was never part of that classification. The *Response to Submissions Report* is inadequate in its treatment of this major concern and should not be accepted.

Conflicts of interest and the EIS

We note that many of the supporting submissions fail to address the EIS and instead support the idea of the Powerhouse at Parramatta because it presents economic, commercial or other opportunities that will benefit them or their organisations.

The value of the proposed museum is not in its commercial value to private or even other institutional interests, but its value in terms of the cultural role of a museum in telling the stories of being, belonging and becoming. The importance of this institution is in its capacity to display material heritage, explain and amplify cultural heritage, encourage understanding of place and people, and nurturing sustainable understanding of technologies, cultures and relationships. Its purpose is not to bring money into the Parramatta CBD but to bring culture and understanding.

Those submissions that fail to address the EIS and instead support the proposal on the basis of their own commercial interests should be called out. They certainly should not be allowed to prevail in the presentation of “new histories” (*Response to Submissions Report*, p 10) as a justification for destruction of cultural values.

Willow Grove

The *Response to Submissions Report* acknowledges that there are no comparable existing buildings specifically within the context of the Parramatta CBD. But the solution proposed is to “construct and relocate Willow Grove to another location” (*Response to Submissions Report*, p 9). We have already made clear to the concurrent Parliamentary Inquiry DSMG’s view that



relocation to a precinct that is burdened by its violent and destructive history is not just inappropriate, but deeply offensive to Dharug people. Further, the proposal that the building would be transferred to a government instrumentality that has consistently denigrated and denied Dharug people and our historical and contemporary experience as part of a development of a commercial and residential complex in the relocation area is a gross example of the sort of cumulative and repetitive trauma that we referred to in our original submission.

Cultural Heritage Consultative Processes

DSMG notes that many elements of the dissatisfaction with the destruction of heritage values by the project are assumed to be addressed by ongoing community consultation and heritage assessment and management processes. DSMG is a Registered Aboriginal Party for the project and an active participant in the Community Reference Group. We have voiced our concern and dissatisfaction with that process on several occasions. It cannot be allowed to pass without comment that this process is not appropriate as a replacement for solutions that respect and retain heritage values as central to the way the project proceeds.

Wrong-headed thinking in reaching self-justified conclusions

The *Response to Submissions Report* concludes that

On-balance the proposed development is considered to be in the public interest and will not result in any unacceptable social, economic or environmental impacts that cannot be appropriately managed through the identified mitigation measures and conditions of consent (p16).

For Dharug people whose views about the importance of the place as part of the storying of Parramatta as a place of belonging, being and becoming not just for Dharug people but for many of our kin whose lives begin and end in the river and across the landscape over spans of time that dwarf the proposed 100-year life of this building, this conclusion is wrong-headed, destructive and deeply offensive. Given how clearly Dharug concerns about the project and the processes involved in its assessment (or, as we have noted above, pre-determined 'approval'), this conclusion simply (and once again) excludes Dharug people as an element of the public interest that is apparently served by the state of NSW and its institutions. Despite the Museum's agreement to act in ways that respect Dharug presence in Nura, this museum will (again) erase it and the state and its self-interested institutions, consultants, economic partners and even its Indigenous agencies will allow this to happen.

The *Response to Submissions Report* should be required to explain how this is even possibly in the public interest for the Dharug public.

In conclusion

DSMG continues to insist that both the EIS and this *Response to Submissions Report* are flawed because they treat the site as having no inherent value as Nura. Their wilful dismissal of Dharug concerns about heritage and their careless confusion of commercial and public interests, including the offensive exclusion of Dharug values from any consideration as part of the public interest, renders the *Response to Submissions Report* unacceptable as a basis for any final project approval.



Further, the configuration of the process as one that will inevitably lead to project approval renders it is anathema to a proper assessment process. There are serious failures in the EIS and the *Response to Submissions Report* that are reflected in the absence of 'no development' and 'alternative development' scenarios and this warrants serious consideration in order to preserve the existing heritage values and respect Dharug storying of the site.

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For Dharug Strategic Management Group