

24 May 2022

2190948

Mr Mick Cassell
Secretary
NSW Department of Planning and Environment
4 Parramatta Square
Parramatta NSW 2150

Attention: Amy Watson (Team Leader, Key Sites Assessments)

Dear Amy,

**Parramatta Powerhouse
Submissions and Amendment Report – Mod 1 to State Significant Development Consent SSD-10416**

We write on behalf of Infrastructure NSW (the Proponent) in relation to the Section 4.55(1A) Modification Application (MOD 1) to the Powerhouse Parramatta project (SSD-10416) at 34-54 and 30B Phillip Street and 338 Church Street, Parramatta (the site). This letter sets out the Submissions and Amendment Report in response to the letter from the NSW Department of Planning and Environment (DPE) dated 4 March 2022. The following report sets out the analysis of submissions, actions taken and response to submissions and the details of further amendments to the Modification Application as required by the *State Significant Development Guidelines* (DPE 2021).

This letter should be read in conjunction with the original Modification Application and the following information:

- Summary and detailed response to agency submissions prepared by Infrastructure NSW and Ethos Urban (**Attachment A**);
- Design Integrity Panel Report (**Attachment B**);
- Revised Architectural Drawings prepared by Moreau Kusunoki and Genton (**Attachment C**);
- St George's Terrace analysis paper prepared by Infrastructure NSW (**Attachment D**);
- Comparison of rooftop landscaping prepared by Moreau Kusunoki and Genton prepared by (**Attachment E**);
- Wind Statement prepared by Arup (**Attachment F**); and
- Addendum Crime Prevention through Environmental Design (CPTED) Assessment prepared by Ethos Urban (**Attachment G**).

1. Analysis of Submissions

In response to the notification of the Modification Application by DPE, submissions were received from Parramatta City Council and Heritage NSW. No public submissions were received. These submissions provided further comment regarding the retention of heritage fabric, heritage conservation measures, site archaeology and landscaping. Full details of the two submissions and the matters outlined by DPE, including detailed responses, are provided at **Attachment A**.

2. Actions taken since exhibition

The Proponent has undertaken further technical analysis in response to the matters raised by DPE, City of Parramatta Council and Heritage NSW in relation to Mod 1, which are contained within and appended to this statement.

The Design Integrity Panel has reviewed and confirmed its support for the proposed modifications as set out in **Attachment B**.

Further progress and implementation of archaeology and heritage conditions by the Proponent has also identified a need to amend additional conditions as set out in **Section 3** of this letter.

3. Proposed Amendments to Modification Application

Revised Architectural Drawings have been prepared by Moreau Kusunoki and Genton (**Attachment C**), noting that these drawings are for clarification/consistency purposes and do not propose any further amendments beyond those previously described in the Modification Application.

This Modification Application seeks to amend the timing of the satisfaction of Condition C16 to align with the submission of the Archaeological Excavation Report prepared in accordance with Condition C50. At present, Condition C16 requires the Heritage Interpretation Plan to be prepared and submitted to the Department for approval 'prior to the construction of the built form of the museum'. However, Condition C50 requires that Archaeological Excavation Report be prepared and submitted at a later date, being 'within 12 months of the completion of archaeological excavation'.

In order for the Heritage Interpretation Plan to be able to draw on the research and findings from archaeological excavations, it is requested that Condition C16 be amended to require the submission of the Heritage Interpretation Plan at the same time that Condition C50 is satisfied (i.e. within 12 months following the completion of archaeological excavation). This will continue to allow for sufficient time to facilitate implementation of the Heritage Interpretation Plan.

4. Response to Submissions

St George's Terrace

A position paper outlining the approach to St George's Terrace is provided at **Attachment D** which describes and further justifies the proposed approach to this space. St George's Terrace is proposed to be used for flexible programming space, including a supplementary concierge for education and group bookings, an exhibition and event support, a space for school and group gathering and orientation, an education and workshop space, and supporting ticketing and front of house areas. The inclusion of St George's Terrace offers an additional opportunity to expand the functional flexibility of Powerhouse Parramatta becoming the (albeit smaller) third building that will serve to enhance the museum offering.

Attachment D outlines a number of options which were considered to provide physical integration between St George's Terrace and Presentation Space 1 (PS1), however, these options are not considered appropriate as they would compromise light, climatic and access control to PS1, provide limited benefits in terms of joint use of the two spaces, and reduce opportunities for activation and access in the space between PS1 and the St George's Terrace. In comparison, the proposed option is preferred as it:

- Maintains the integrity of the competition winning scheme in terms of the façade design.
- Protects the ability to host an array of events within Presentation Space 1 that require light and climatic control.
- Enables St George's Terrace to integrate to the north and western public domain areas, providing activation of the ground plane around the Terrace through people movement.
- Allows for the operational integration of St George's Terrace without compromising museum functionality.

Integration of St George's Terrace into the Powerhouse is not predicated on a physical connection. Rather, and as with the separation of PS1 and PS2, reliance is placed on the ground plane as the linking device. This approach will enhance the role of Powerhouse Parramatta as 'part of the city', facilitating the movement of visitors within the ground plane and enhancing the overall activation of the streetscape and pedestrian network (existing and future) of Parramatta.

Accordingly, the proposed integration approach is considered to represent the optimal design and functional outcome that should be supported.

Rooftop Landscaping

The Modification Application proposes changes to the rooftop landscape only, with all other landscape areas remaining as per the approved development. In addition to enabling greater weather protection for visitors, the expanded roof structure will allow greater protection for plants. At this height and with the northerly aspect, plants will be exposed to significant wind and sunlight. The roof structure will assist in tempering wind and protecting from the harshest levels of sunlight which will enable a wider variety of species to be grown

As outlined in the comparison diagrams provided at **Attachment E**, The approved rooftop design contained 22 trees and 624 square metres of area available for landscaping (low level planting). The proposed modification contains 30 trees and 521 square metres of area available for landscaping (low level planting). The modification reduces the planting area by landscape area on the rooftop by 103 square metres however incorporated an additional 8 trees, which will create a bigger landscape impact.

The revised planter bed layout will better suit use of the rooftop for education and exhibition programs of the museum. The proposed design whilst retaining the same amount of planting space, better structures the planting so that it can be utilised for education programs and exhibitions that require a contained and controlled space rather than a series of disparate planting spaces.

Accordingly, the revised approach to the rooftop terrace weather protection and landscaping will deliver an enhanced project outcome in terms of both landscape quality and functionality for the programming of the museum.

Sequencing of Condition C16

The proposed amendments to the timing of Condition C16 will result in no adverse environmental impacts given the nature of the changes. No changes are proposed to any of the approved physical works or development as a result of this amendment. This change is administrative in nature only, and will ensure a higher quality outcome by ensuring that the Heritage Interpretation fully accounts for and incorporates findings from archaeological investigations undertaken at the site.

Wind

Arup have reviewed the proposed modifications and provided an addendum wind statement (**Attachment F**) which confirms that there will be minimal wind impacts associated with the proposal.

Crime Prevention through Environmental Design

Ethos Urban have prepared an addendum CPTED assessment (**Attachment G**) that considers the crime and safety aspects of the proposed modifications to St Georges Terrace. The assessment concludes that, with the implementation of the recommendations identified in the assessment, the proposed modification would be classified as being of 'low' risk from a crime and perceived safety perspective.

5. Conclusion

We trust that the above information is sufficient for DPE to complete its assessment and determine the Modification Application. Should you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,



Michael Oliver
Director, Planning
0402 644 681
moliver@ethosurban.com

Attachment A – Detailed Response to Agency Submissions

Ref	Submission	Response
NSW Department of Planning and Environment		
DPE1	Provide evidence that the Design Integrity Report submitted with the application has been endorsed by the DIP.	Refer to Attachment B - Design Integrity Panel Report
DPE2	Consider and provide a response to Council's recommendations in relation to the fabric of St Georges Terrace. Provide justification where any recommendations cannot be implemented.	See responses to Council comments below.
DPE3	Provide further details to demonstrate how the proposed use and operation of St George's Terrace would integrate with Presentation Space 1 and the overall museum. This should include: <ul style="list-style-type: none"> • details of the options explored to integrate St George's Terrace with the Eastern building as required by Condition C3. • 3D renders and perspectives along the space detailing the proposed finishes of the buildings and the laneway space. • details on how the space between St George's Terrace and Presentation Space 1 would be used. 	Refer to Attachment D - St George's Terrace Responses.
DPE4	Detail how the concierge function proposed within St George's Terrace would relate to the reception/concierge uses in the main museum complex.	Refer to Attachment D - St George's Terrace Responses.
DPE5	Provide an updated CPTED assessment that considers the laneway between St George's Terrace and Presentation space 1 with particular regard to natural surveillance, access control and use of the space, territorial reinforcement, space management, maintenance and lighting.	Refer to Attachment G - CPTED Update.
DPE6	Update the wind assessment to factor in the retention of St Georges Terrace and confirm the amenity and comfort of the laneway linking Wilde Avenue to the Phillip Street Plaza and include any measures to mitigate wind impacts.	Refer to Attachment F - Wind Advice.
DPE7	Provide details of the material finishes and landscaping between St Georges Terrace and Presentation Space 1.	The material finishes between St George's Terrace and Presentation Space 1 is as per the approved development. The paving will be concrete as a continuation of the surrounding paving finishes throughout the Powerhouse site. Refer to Attachment D - St George's Terrace Responses.
DPE8	Quantify the overall landscape/ tree canopy coverage on the site, compared to the approved development and any options to increase landscaping if the proposal reduces tree canopy.	The modification application proposes changes to the rooftop landscape only. All other landscape areas remain as per the approved development. The approved rooftop design contained 22 trees and 624 square metres of area available for landscaping (low level planting). The proposed modification contains 30 trees and 521 square metres of area available for landscaping (low level planting). The modification

Ref	Submission	Response
		<p>reduces the planting area by landscape area on the rooftop by 103 square metres however incorporated an additional 8 trees, which will create a bigger landscape impact.</p> <p>Refer to Attachment E - Rooftop Landscape Comparison.</p>
DPE9	Provide details of the revised landscape treatment on the eastern building rooftop pavilion.	<p>Attachment E – Rooftop Landscape Comparison demonstrates the different arrangement of planting spaces within the rooftop. Overall the proposal reduces the planting area by landscape area on the rooftop by 103 square metres however incorporated an additional 8 trees, which will create a bigger landscape impact.</p> <p>In addition to enabling greater weather protection for visitors, the expanded roof structure will allow greater protection for plants. At this height and with the northerly aspect, plants will be exposed to significant wind and sunlight. The roof structure will assist in tempering wind and protecting from the harshest levels of sunlight which will enable a wider variety of species to be grown.</p> <p>The revised planter bed layout will better suit use of the rooftop for education and exhibition programs of the museum. The proposed design whilst retaining the same amount of planting space, better structures the planting so that it can be utilised for education programs and exhibitions that require a contained and controlled space rather than a series of disparate planting spaces.</p>
DPE10	Confirm the setback of the proposed rooftop pavilion to the building edge.	The setback of the proposed rooftop pavilion is 2,050mm from the western façade, 3,750mm from the northern façade, 3,580mm from the eastern façade and 3,250mm from the southern façade. Refer to Attachment C - Revised Drawings.
DPE11	Confirm whether the rainwater tank room on the roof of the eastern building is being removed from the design or relocated within the development.	The rainwater tank has been relocated to level 3.2.
DPE12	<p>Update the following plans to reflect the proposal:</p> <ul style="list-style-type: none"> Proposed Site Masterplan DA062, rev 13, dated 19 October 2020, prepared by Moreau Kusinoki Level 4.1 Plan DA 141, rev, 12 dated 8 October 2020, prepared by Moreau Kusinoki Landscape plan LD-DD-03, rev C, dated 14 January 2021, prepared by McGregor+Coxall. 	Refer to Attachment C - Revised Drawings
City of Parramatta Council		

Ref	Submission	Response
COPC1	The retention and restoration of some of the existing chimneys. The remaining internal fabric includes modest fireplaces and potentially some internal walls that are evidence of history and use which contribute to the heritage significance of St George's Terrace.	<p>The plans demonstrate that an existing chimney is proposed to be retained on the western façade of the terrace. The remaining chimneys proposed to be removed are considered justified as:</p> <ul style="list-style-type: none"> • The chimneys do not service existing fireplaces as all existing fire places are bricked up or have been removed. • There will be limited views of these chimneys from surrounding locations once the museum is constructed. • The concept for a double height open space within the terrace is considered to provide a suitable adaptive reuse of this structure that will ensure not only its longevity but also functionality as part of Powerhouse Parramatta. <p>Retaining the chimneys within a double height open space is not structurally feasible without compromising the scale and functionality of the space.</p>
COPC2	The window and door openings should be reinstated to the original proportions, including the removal of the brick window infills.	<p>The design approach to St George's Terraces was primarily focused on prioritising the South, East and West facades that belong to the original fabric of the Terraces with more intrusive elements proposed for demolition.</p> <p>The intent is to highlight the historic facades of the building, acknowledging that passage of time has left its trace and has brought with it change. The design consciously refrained from artificially reconstructing the image of the original and adopted a contemporary approach to preservation, which treats the built fabric as something that evolves and reflects different phases of its history. The objective is to respectfully preserve the heritage that remains towards an adaptive reuse of the building that responds to contemporary needs.</p> <p>Further, the proposal removes the brick window and opening infills, resulting in more generous openings to maximise the natural light into the spaces and provide activation to Phillip Street.</p>
COPC3	Fill or reconstruct the additional opening spaces at ground level that were created to convert each terrace into a commercial business with shop front incorporating door (between 1970 and 1978). This should be based on historical evidence if any and the use of sympathetic materials compatible with the building's heritage value is recommended.	See response to COPC2.
COPC4	The reinstatement and restoration of the first-floor verandahs. The statement of heritage significance states that 'Original verandahs with curved corrugated iron roofs, cast iron balustrading and plaster urns that surmounted the continuous parapet that have all been removed.' However, research of historical evidence and comparative analysis could identify suitable examples	<p>See response to COPC2.</p> <p>The design of the Terrace utilises their full height into one generous light-filled space, which better responds to the needs and assigned program of Powerhouse Parramatta. As there is no internal upper level, the verandahs would only be a decorative element of the façade.</p>

Ref	Submission	Response
	to be adopted for the reconstruction. These verandahs could be supported via an internal walkway to support the maintenance.	
COPC5	Restore the render and original colour scheme based on Heritage NSW (HNSW) guidelines.	Further research will be undertaken regarding original colours and will be implemented subject to consultation with the Design Integrity Panel regarding appropriateness.
COPC6	Restoration of stucco/plaster urns details, based on historical evidence if any, and HNSW guidelines.	The plaster urns will be restored as part of the works.
COPC7	Reinstatement and redesign of front door and windows inspired and based on typical Victorian style doors and windows. This could form part of the heritage interpretation.	See response to COPC2. Recreating a previous original element would not form interpretation, rather would be a form of imitation. For the reasons outlined in point COPC2, it is considered that the evolution of the change in use of the Terrace should be celebrated.
COPC8	Removal of intrusive 1970 addition of verandahs aluminium awning, rods, signage and brackets on each terrace.	These items will be removed as part of the scope of works.
COPC9	Reinstate the verandah floors at ground level that were brick paved in 1970, based on historical evidence if any, and HNSW guidelines, this could be part of the heritage interpretation.	The material finishes surrounding the Terrace as per the approved development. The paving will be concrete as a continuation of the surrounding paving finishes throughout the Powerhouse site.
COPC10	Restoration of verandah supports that must remain, as brick privacy walls extend with recessed arches between each terrace.	These items are retained and will be restored along with the retained façade.
COPC11	Integrate significant archaeological findings of the trenches and investigative excavation and relics discovered within the footprint of the St George terraces.	Condition C16 requires the development and implementation of a Heritage Interpretation Plan. As part of this plan the results of any archaeological discoveries are to be included in the site-wide interpretation. Any artefacts that are discovered as a result of works within St George's Terrace would be included as part of the interpretation requirements under condition C16.
COPC12	As per the above recommendations an experienced heritage consultant would need to be engaged and consulted for all phases of the project. The consultant needs to provide a detailed conservation work schedule (including architectural plans, details and material and finish), historical research and analysis in relation to the significant heritage fabric of St George terraces to be retained, conserved and restored.	A heritage consultant will be retained throughout the works to St George's Terrace. The consultant will work with the project's nominated architects to ensure all necessary plans, details and work method statements are developed to ensure conservation of retained elements and integration of new fabric.
COPC13	The heritage interpretation strategy which was submitted under the original development application did not include the built heritage retention of St George Terraces. As such a Heritage Impact Statement for St George Terraces should be prepared which addresses and integrates archaeological findings of the investigative trench excavation and relics discovered and the historical evidence and comparative research analysis for the reconstruction of removed elements such as balconies, verandas floor and roof, doors, and windows as detailed above. The interpretation strategy should also consider historical notes and researched part of the Statement of Heritage Impact about the past uses	A Heritage Impact Statement was lodged with the modification application (Appendix C). Condition C16 requires the development and implementation of a Heritage Interpretation Plan. As part of this plan the results of any archaeological discoveries are to be included in the site-wide interpretation. Any artefacts that are discovered as a result of works within St George's Terrace would be included as part of the interpretation requirements under condition C16.

Ref	Submission	Response
	and inhabitants of the terraces to explore opportunities to integrate the history into the proposed and future alterations and additions. It is Council's preference that this is submitted as part of this modification application prior to determination.	As is required for Willow Grove, St George's Terrace will be included within the project's Heritage Interpretation Plan required under condition C16.
COPC14	Council notes that the changes to the eastern roof will allow for additional event space, which is welcomed. However, the reduction in landscaping when compared with the original approval is considered to be a loss. The applicant should look to increase landscaping elsewhere on site to ensure that there is no net overall loss of greenery as part of this modification.	<p>The approved rooftop design contained 22 trees and 624 square metres of area available for landscaping (low level planting). The proposed modification contains 30 trees and 521 square metres of area available for landscaping (low level planting). The modification reduces the planting area by landscape area on the rooftop by 103 square metres however incorporated an additional 8 trees, which will create a bigger landscape impact.</p> <p>Refer to Attachment E - Rooftop Landscape Comparison.</p>
Heritage NSW		
HNSW1	This modification affects St George's Terrace, which is a local heritage item and therefore will be appropriately managed within the controls of the Parramatta Local Environmental Plan 2011. State Heritage Register items are not directly affected by this modification.	Noted.
HNSW2	<p>Advisian have outlined in their Heritage Impact Statement that the removal and replacement of the ground floor slab of St George's Terrace has potential for archaeological relics to be disturbed. To avoid and mitigate potential impacts, Advisian have recommended the adoption of the mitigation measures for archaeological monitoring and managing unexpected finds as described in the <i>Historical Archaeological Research Design and Excavation Methodology</i> (Curio Projects, Final, December 2021).</p> <p>The Heritage Council supports this approach, however notes that retention <i>in situ</i> should be given consideration as the preferred management outcome for any relics of State significance to be disturbed by the proposed works.</p>	<p>Noted, retention in situ is considered the priority outcome for any relics of state significance.</p> <p>It is noted that any archaeological works will be undertaken in accordance with the Addendum Historical Archaeology Impact Assessment (Curio Projects, 2020).</p>
HNSW3	<p>Heritage NSW provided comments to the former Department of Planning, Industry and Environment on the draft Environmental Impact Statement for this project on 3 November 2020. In that advice we explained that:</p> <ul style="list-style-type: none"> • The Aboriginal community consultation process needed to be completed • An Aboriginal Cultural Heritage Management Plan needed to be prepared. • The long term management of Aboriginal objects needed to be resolved. <p>These comments remain relevant to the broader project.</p>	<ul style="list-style-type: none"> • The Aboriginal community consultation process was completed prior to approval of SSD10416. • An Aboriginal Cultural Heritage Management Plan (ACHMP) is required by condition C46 of the consent and this modification does not change that obligation. • Long term management of any Aboriginal objects discovered as a result of archaeological investigations will be dealt with as part of the ACHMP.
HNSW4	In relation to this modification, we note that there may be potential for Aboriginal archaeological deposits to be uncovered below the ground floor slab that will be removed and replaced as part of the works to St George's Terrace. Accordingly, it is recommended that mitigation measures in relation to	All archaeological works for Aboriginal archaeology are guided by the Aboriginal Cultural Heritage Assessment Report (Curio, 2021) and this will equally apply to the works proposed under this modification.

Ref	Submission	Response
	Aboriginal objects are in place for archaeological monitoring and the management of unexpected finds continue to apply to this Modification (Curio Projects, 2021). Reference should be made to the Aboriginal Cultural Heritage Management Plan, if this document has been prepared as previously recommended by Heritage NSW.	