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6 August 2022

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Dear Renah

National Trust objection relating to the Powerhouse Ultimo Renewal - State Significant Development (SSD-32927319)

Thank you for the extension that was provided in order for the National Trust of Australia (NSW) to provide comment in relation to the Powerhouse Ultimo Renewal. This has allowed us to review the documentation in detail.

Our review has led us to the conclusion that the Powerhouse Museum as an institution remains under threat and that this current proposal does little to convince the National Trust that the museum, its collections and buildings are seriously being protected at Ultimo. We strongly oppose the Concept State Significant Development Application (SSDA) in its current form. It inadequately addresses the history and significance of the site and museum, and its future development framework does not protect the integrity and value of the place.

Summary Position

The National Trust supports investment, ongoing maintenance and funding for the Powerhouse Museum at Ultimo. We encourage its continued growth and development, however the Concept Plan does not outline a suitable basis for this to occur in future.

The National Trust has found the following areas outlined in the SSDA to be intrusive and destructive to the conservation of the precinct:

- The Conservation Management Plan (CMP) is inadequate and does not comprehensively address the needs or values of the precinct.
- The Harwood Building has not been appropriately considered nor evaluated. This building must be part of any Concept Plan for the Powerhouse Museum.
- The significance of the original 1988 Wran Building has been understated and under-documented.
 The design intent of this building needs to be understood so that any future concept plans can recover and/or expand upon this component.
- The museum collection has not been appropriately considered.
- The maximum allowable building envelopes would be catastrophic to the integrity of the site.
- The proposal does not adequately address environmental concerns.
- The Ultimo site needs to focus on all applied arts and sciences, not just fashion and design.



The Powerhouse Ultimo Renewal Concept Application

The National Trust realise that this SSDA is not a full proposal for the site, and that the Planning Framework (Stage 1), Architectural Design Competition, and the Detailed Design (Stage 2) will follow. Our comments are intended to help frame these next stages to ensure the integrity of the museum (its buildings, collections and site) are maintained in any renewal process.

The Environmental Impact Statement (Ethos Urban) describes the SDD as:

"This application sets out the concept proposal for the renewal of Powerhouse Ultimo. It seeks to establish the overarching guidelines, principles and development controls for the detailed design, construction and operation of buildings and public domain spaces for Powerhouse Ultimo that will be detailed and assessed at the next stage of the project.

No physical works are proposed as part of the Concept SSDA, however the application seeks consent for the following specific matters (as detailed in the EIS):

- A maximum building envelope for any new buildings and alterations or additions to existing buildings retained onsite.
- Use of the site as a 'information and education facility' including museum exhibition and learning spaces that are supported by a range of ancillary and related uses contributing to the operation of the Powerhouse Ultimo.
- Design Excellence Strategy and Urban Design Guidelines to guide the next stages of the project.
- Draft 2022 Conservation Management Plan (CMP) to ensure that future development occurs in a manner that is compatible with, and facilitates the conservation of, the heritage values of the site.
- General functional parameters for the future design and operation of the site including principles
 and strategies for the management of heritage. Transport and access, noise and vibration, utilities
 and services, and the like.

National Trust recommendations:

- The maximum building envelopes for any new buildings cannot be supported or justified in any way whatsoever. These envelopes will destroy the heritage values of all buildings on the site, and must be modified for any architectural brief.
- The primary purpose of the Powerhouse Museum must be as a MUSEUM, not as an "information and education facility" that includes a museum.

Significance of the Powerhouse Museum Precinct

The National Trust has a very great interest in the Powerhouse Museum, dating back many years. In 1974, the Trust listed the *Museum of Applied Arts and Sciences and its Historical Collection* and has continued to advocate for this institution and its collection since that time. In 2015, we nominated the current Powerhouse Museum for inclusion on the State Heritage Register, and since that time have made countless submissions to various inquiries relating to the proposals to close the Powerhouse Museum site at Ultimo.

The documents on exhibition, including the EIS, the Conservation Management Plan (CMP) and the Statement of Heritage Impact (SOHI) include only those elements of the place contained within the State Heritage Register – despite the entirety of the site being listed on the Heritage Schedule of the City of Sydney LEP (Lot 1, DP 631345) and despite the original National Trust nomination to the SHR including the entire place.

This is a fundamental failure of the exhibited documents – they downplay the overall significance of the place (including those elements of its earlier adaptive reuse); they do not consider the collections; and they do not read as an objective analysis of the place but rather appear written to a predetermined



outcome. They should not be relied on for the formulation of design strategies, building envelopes and future design guidelines.

Accordingly, the Trust reasserts the significance of the Powerhouse Museum, as described below in the original National Trust nomination for State Heritage Register Listing:

The Powerhouse Museum is the flagship venue of the Museum of Applied Arts and Sciences. It has for more than 30 years been the principal museum of technology, industry, science, design and decorative arts in NSW. It inherits from the earlier Technological Museum historical and cultural associations which originated in the 1889 International Exhibition in the latter half of the nineteenth century.

The Powerhouse Museum and its changing use, from industrial power station to cultural institution, offers a unique insight into the stages of technological change, development and urban renewal that occurred in New South Wales during the 20th century.

The former Ultimo Power House buildings are themselves a historical illustration of industrial advance and were a key component of industrial change in Sydney, providing electricity to the tram network and later contributing electricity to the rail network and the Sydney County Council's grid.

The conversion and extension of these buildings to house the Powerhouse Museum is a significant historical layer. The adaptive reuse of the former Ultimo Power House buildings was an important initiative of the NSW Government, involving the Government Architects Branch and NSW Department of Public Works. The project was linked to the revitalisation of the Ultimo Pyrmont Peninsula. It was also one of the first major projects in NSW to adaptively reuse industrial buildings for cultural purposes. The location of the Museum in a former industrial building complex, being the Ultimo Power Station, was considered to be highly appropriate to the history, intent and culture of the Museum and its collection.

Architect Lionel Glendenning designed a museum that optimised the large scale and volume of the generous spaces provided by the adaptively reused former Ultimo Power House buildings and also generated new spaces in the Wran Building to accentuate highly valued and historically significant objects in the MAAS collection such as the Boulton and Watt Steam Engine, the Strasburg Clock and Locomotive No.1 with tender and carriages.

Other permanent key collection items that contribute to the significance of the Powerhouse Museum include the Lawrence Hargrave kite (replica), the Bell JetRanger helicopter and the exhibitions: The Steam Revolution; Space: beyond this world; and Transport: lines across Australia.

The overall Museum complex, as completed, was considered at the time to be a highly innovative design, producing a state-of-the-art museum by world standards. The complex was recipient of the 1988 Sulman Award and it is recognised nationally and internationally.

The Powerhouse Museum is historically significant as one of the first purpose designed 'new generation' of museums that opened in Australia in the 1980s. The Powerhouse Museum's exhibitions were purposefully designed by the curators in association with Glendenning to encourage hands-on interaction and engagement.



The opening of the Powerhouse Museum was an important event for NSW and was published in the NSW Government's calendar of celebrations for NSW's Bicentenary Year. The celebrations of the Bicentenary Year have State historical significance as they engaged much of the population of the State, they ushered in a new sense of national self-confidence and, at the same time, raised important questions about Aboriginal rights, national identity, multiculturalism and historical interpretation.

The Powerhouse Museum has social significance to the people of NSW as a highly valued cultural institution. There is a strong sense of pride in the expression of Australian innovation and achievement represented in the Museum's collection and exhibitions. Many people have fond memories of visiting the Powerhouse Museum, sharing the experience with their families and as learning journey with school groups. The success of the adaptation of Ultimo Powerhouse for the Museum of Applied Arts and Sciences provided a model and inspiration for the subsequent adaptation of similar buildings around Australia.

Ultimo is the Flagship

The Museum of Applied Arts and Sciences is called the Powerhouse Museum is because it is built within the former Ultimo Power House. This is one of the reasons that the opening of this new museum in 1988, just down the road from its previous site, was so widely celebrated – it expanded the size and remit of the institution, and retained its close associations with the institutions in this part of the city.

The investment of \$500 million must result in a world-class museum in Sydney, however the Urban Design Report (p.11) worryingly states that "the renewal of Powerhouse Ultimo will complement the museum's flagship Powerhouse Parramatta, Powerhouse Castle Hill, and the Sydney Observatory." Parramatta – a flood-prone site – cannot be the flagship for this premier museum in NSW.

The Trust would instead support the alternative wording of the preliminary objectives of the development as outlined in the Visual Impact Assessment (p.25) where it states that the aim is to "deliver an international standard museum that is complimentary to Powerhouse Parramatta, Powerhouse Castle Hill and Sydney Observatory."

Sydney (Ultimo) needs to remain the core site for the Powerhouse Museum, supported by other branches, and this is clear in the *Museum of Applied Arts and Sciences Act 1945* where it states: "All real and personal property and all right and interest therein which at the commencement of this Act is vested in or held by any person in trust for or on behalf of or for the purposes of the Sydney Technological Museum or any of its branches shall vest in and belong to the trustees for the purposes of this Act."

National Trust recommendation

As per the Act, the Ultimo site must remain the flagship of the wider network of Powerhouse Museums if it is to help establish a new "Creative Industries Precinct" in this area and stand alongside the other world-class institutions in Sydney including the State Library, Art Gallery of NSW and Australian Museum – all recent recipients of significant Government funding to *expand*, not limit, the public access to their important collections.

Museum Collection

There is a very great concern that this proposal seeks to remove the bulk of the Powerhouse Museum collection from the Ultimo site, and provides minimal guarantee as to the preservation of the collection. The collection and its appropriate display and interpretation as part of the museum must be guaranteed –



they are one and the same. Not even the future of the Bolton and Watt Steam Engine and Locomotive No.1 are addressed in this proposal.

There is of course an acknowledgement that the Powerhouse Collection is immense and cannot possibly all be stored at Ultimo or all put on display. What must be guaranteed however is that there will be permanent exhibition spaces at Ultimo – not temporary exhibition areas – to display this important collection in all of its variety. For many years the Powerhouse has had limited funding to revise and update its exhibitions, and the costs associated with installing temporary exhibitions are immense. There is enough space at Ultimo for world-class travelling exhibitions to be installed, but, just as is the case at all other art galleries and museums, this must be accompanied by permanent exhibition of permanent collections. This is probably the most critical part of this project, and it must be addressed.

National Trust recommendation

The Powerhouse Museum must have dedicated, permanent exhibition space to display a permanent collection. The collection of the Powerhouse must not be "relocated" to Castle Hill on a permanent basis.

Museum Focus must not be on fashion

The Create Infrastructure and MAAS websites, Urban Design Report Executive Summary, and even Visual Impact Assessment all note that "the renewal will see Powerhouse Ultimo deliver a programming focus on design and fashion." This aligns with media reports following the funding announcement that "fashion and design will be at the forefront of the refurbished museum, with its sister museum at Parramatta to focus on science and technology."

The Powerhouse Museum can and should contain excellent display and programming of fashion and design, but not at the expense of the rest of its collection. The Ultimo site must showcase the full Powerhouse Collection, and this must be at the core of any design framework for renewal.

No other similar museum in the world would seek to limit its focus in such a way. The very reason that people visit the Victoria and Albert Museum in London or the Smithsonian Institution in Washington is to see the variety of their collections. The Ultimo site needs to be the place where the Powerhouse collection, containing more than 500,000 objects collected over 135 years, is celebrated in all of its magnificent variety.

Arguments that the collection can be viewed and accessed at other locations, particularly the Castle Hill Discovery Centre (which has inadequate public transport connections and is only open on weekends) are not supported.

National Trust recommendation

The Ultimo Powerhouse Museum must not have a focus solely on fashion and design. Like all other equivalent world institutions, it must showcase the entire spectrum of the applied arts and sciences in order to demonstrate the full power of human creativity to the widest possible audience. Accommodating the wide variety of the collection must be a core part of any design brief.

¹ https://www.maas.museum/powerhouse-renewal/

² 'Waratah rising from the fires': Powerhouse funds get mixed reviews, Linda Morris, Sydney Morning Herald, June 15 2021



Maximum Planning Envelopes

The Urban Design Report (p.24) states that, in accordance with the NSW Government Architect Design Guide for Heritage, the "Powerhouse Ultimo renewal will retain and celebrate the existing heritage listed buildings including the heritage core and the Former post Office, celebrating its history and significance."

This will be impossible to achieve if the maximum planning envelopes shown in the reference design are pursued. They must be revised.

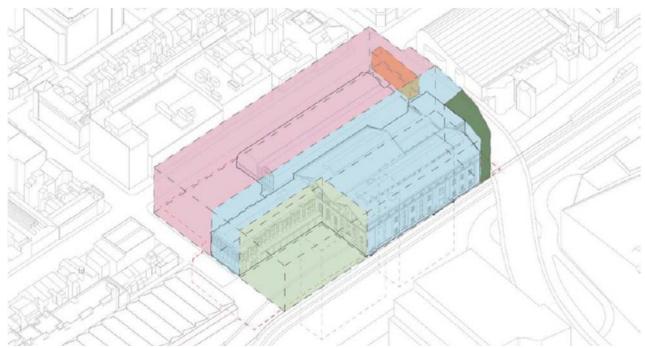


Figure 1: The maximum planning envelope (Source: John Wardle Architects)

The Trust does not support the maximum building envelopes proposed in the application. An adequate assessment of the impact of proposed built form and urban design cannot be made based on the shaded 'boxes' placed over heritage buildings as currently exhibited.

It is unclear and unjustified as to why a "maximum building envelope" approach has been used. The exhibited documents clearly state that due significant heritage buildings, a maximum building envelope **would not be achievable** across the entire site. The question must then be asked why consent is sought for a blanket maximum building height envelope across the entire site?

As stated in the City of Sydney submission, and fully supported by the National Trust:

"Any built form over the northastern courtyard and the goods tracks could have a negative impact on the heritage listed result in a building that obscures the three primary heritage buildings of the complex, being the Turbine Hall, the Boiler House and the Switch House, obliterating views to these buildings.

Additional built form above the heritage items would obscure the distinctive profiles and forms of heritage listed buildings of exceptional significance. The legibility of the historic built forms and the appreciation of the buildings in significant views would be diminished. The distinctive and significant roofscape includes pitched roof forms, roof lanterns, chimneys and castellated parapets. The array of the forms of the heritage buildings has been described by Lionel Glendenning, the Powerhouse Museum architect, as being 'like a town', or a townscape."



The impact of the proposed additional built form above the heritage items is not adequately assessed or acknowledged. Such additional works would obscure the distinctive profiles and forms of heritage listed buildings of exceptional significance and deeply affect the legibility of their historic built forms and significant views.

National Trust recommendation

The maximum building envelopes are not supported in any way. These should be immediately revised to create envelopes that are appropriate to the heritage structures and the wider site. The design brief should not include any additions at all above the original state-listed Power House components of the site.

Visual Impact Assessment

The National Trust completely refute the claim in the Visual Impact Assessment (p.8) that the "sensitivity is reduced as the nature of the change is for uses that are the same as or similar to what exists within the site" and would disagree that (p.66) the "significance of visual impact is largely moderate." We also object to the notion that "consistent with contemporary public works for non-residential buildings, in all instances subject to appropriate siting and design, the proposal is able to be reversed." To assess visual impact on a place on the basis that you can later demolish the building or addition is an extraordinary overreach and a totally unsustainable approach to building in any era, let alone the current context of heightened environmental and social responsibility.

Most aspects of the Visual Impact Assessment are confusing as to whether this is an analysis for the existing or proposed conditions. For example, the view from the Goods line (p.51) notes that "a medium number of people will see the view... including a small number for tourism purposes" and that "their level of interest or attention in the view is expected to be medium." This, despite this viewpoint being the focus of the proposed main new entry to the building and the dominant image used on all report front cover pages.



Figure 2: The main promotional image of the Powerhouse Renewal project, assessed as being a place where "a medium number of people" will see the view of the museum. (Source: Mogamma)

The Trust would even contend that the report (obviously a somewhat subjective study) is in numerous places misleading and irrelevant. For example, the report (p.51) states that "due to the visibility of heritage, in particular the former post office, the view has social and cultural value" — when of course the former Post Office is on the opposite corner of the site and not visible from this location.







Figure 3: Before (left) and after (right) views of the visual impact from the Goods Line. This primary view of the site, and the location of the proposed new entry, is assessed as being of low significance, and showcasing the former Post Office. (Visual impact Assessment)

Another example is the view from Pier Street which describes (p.46) the "almost monumental, large scale and bulk of the Powerhouse" which is "visually dominant", yet then concludes (p.65) that this same view has "negligible" significance and an "imperceptible" magnitude, with the planning envelope having a "perceptible" impact. Despite being taken from the roadway (itself being the way most people will view the site from this location) the report mentions the "distracting nature of the elevated road viaduct in the foreground".



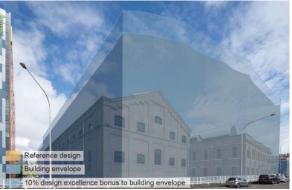


Figure 4: Before (left) and after (right) views of the visual impact from Pier Street. (Visual impact Assessment)

Draft Conservation Management Plan

The exhibited Draft Conservation Management Plan (CMP) states (p.8) that it "assesses the overall heritage values of the Powerhouse site" and aims "to review the significant heritage values of the Powerhouse site today, discussed in the context of any issues that are relevant in 2022 to the ongoing management of the site."

Despite its length, the National Trust feel that this document is sadly lacking in the detail needed to guide significant future work to the site. It treats the place as an empty shell ripe for development, rather than as an entity that is far more important than the sum of its parts. It lacks deep architectural analysis, downplays significance of critical elements and relationships, and is not consistent with other exhibited documents.

Because this is the key heritage document for the site, the National Trust have reviewed the CMP in detail. We note that the document has been primarily written by archaeologists, and has little if any architectural input. The few random pages attributed to Design 5 Architects are not a comprehensive analysis and, when compared to the quality of the CMP for the Sydney Opera House by that firm, we question the actual input they have had into this document as presented.



The Trust agree with the submission by Docomomo that "The Draft CMP's dismissal of the significance of the 1988 alterations to the power house buildings and the 1988 Harris Street wing of the building indicates a lack of architectural understanding of the buildings on the site and, more importantly, the importance of the institution of the Museum of Applied Arts and Sciences (MAAS) itself. The Draft CMP concentrates on the importance of the built industrial heritage of the site rather than the context of the museum as a functioning institution and the changed physical context of Darling Harbour." This analysis is justified from the outset given that the previous 2003 CMP by Architectural Projects was for the "Powerhouse Museum" whereas this document is for the "Powerhouse Ultimo" — with no mention of the museum.

We note (p.16) that "The Powerhouse Museum Collection does not form part of this CMP. The Museum Collection is subject to its own independent Management Plan under the Museum of Applied Arts and Sciences Act 1945 No 31." While this is of course understandable, it does not mean that the actual display of these items and the function of the place as a museum cannot be assessed, as was done in the 2003 CMP. To argue (p.71) that "the Collection of the Powerhouse Museum has been moved multiple times over the years with the first use of the Ultimo site not even 60 years ago" and that this means it is not part of the importance of this museum is to downplay its significance. This document does not even provide a policy or any conservation guidance at all for the Boulton and Watt engine

The draft CMP states (p.16) that it "has been prepared using the historical data and documentation available for the site, drawn predominantly from the 2003 CMP and the other relevant recent heritage reports and resources. Where required, additional primary historical research has been undertaken." Rather than undertaking additional research, this document has removed much previous research and assessment of the actual transformation and design of the site to become the Powerhouse Museum.

The National Trust are greatly concerned that the actual museum use of the site has been almost entirely excluded from this document. We would note that there is not one single image of the 1988 Museum interior as it was originally designed in the document. The "before and after" images in the document instead mostly date from the 2011-12 Annual Report, by which time the building was already substantially altered. We feel that by actually showcasing the original intent it will allow prospective future architects to understand more fully the rationale behind this design, how that can be recovered, and how it can inform any new works (refer figure 5).

There are countless opportunities for the site. We agree with the CMP (p.82) that "there are opportunities for unsympathetic modifications made to the Wran Building in 2003-2005 and 2011-2013 to be removed and the building's original fabric and form reinstated or changed and adapted to complement the heritage-listed portion of the site's historic character and buildings, and to ensure the future success and sustainability of the cultural and museuology functions of the precinct (site) on par with the International contemporary museum practice." We would also agree that there are "Opportunities to celebrate and communicate design philosophies of the 1980s adaptive reuse through interpretation, adaptations or additions" and that this should be encouraged.

There is almost no assessment of the actual design considerations behind the original 1988 museum design and its design principles in the body of the text however, despite these being available (it is not sufficient to place them in an appendix – they should inform conservation policy). To limit this discussion to one page (p.43) with no supporting architectural drawings or photographs is insufficient.

There is also minimal discussion of the way in which the original design of the 1988 museum has been altered since that time, what components may remain or still be recoverable, and how this may have impacted the significance of the building.















Figure 5: No images of the original design and presentation of the 1988 Powerhouse Museum, including for some of its most significant (and now sadly altered) spaces are included in the Draft CMP. The original quality of presentation, materials, spatial planning and design intent can only be revealed through such inclusion. (Source: SLNSW, State Archives, Design Principles document)



The Comparative Analysis in the Draft CMP is entirely inadequate and almost irrelevant. It has focused not on the place as a museum, but instead simply as a converted industrial building. While the Tate Modern may have some relevance, there is not a single actual museum included in the comparison. We would note that:

- While successful, the Casula Powerhouse is an unfinished arts centre, retrofitted within parts of
 an original Power House, large parts of which have never been adaptively re-used. It can in no
 way be compared to the extensive works that were undertaken at Ultimo to create a museum
 environment.
- The Brisbane Powerhouse is an arts and cultural hub and event space, not a museum.
- Carriageworks at Eveleigh is a "multi-arts urban cultural precinct" with large spaces and no permanent collections or display.
- The Musee d'Orsay is referenced as an image on page 86, but not included in the analysis.

The conservation policies within the document are insufficient, and heavily focused on the archaeological and industrial values of the site, rather than the actual museum and built components of the site. For example, there are more specific policies relating to the water-cooling system and manifold than there are for the entire Wran Building. The document also gives little, if any, guidance to how the site should be interpreted and understood in the future. For example, the complete destruction of the original pedestrian plaza and entry to the Harwood Building, now replaced by a fenced carpark with no street connection, is not mentioned at all, nor is the significance of this part of the site assessed, with the analysis only focused on the building itself when this was of course part of the original conversion project, just as the Harris Street forecourt was to the later part of the museum.





Figure 6: The original entry to the Harwood Building (left) and its current state (right). (Source: Draft CMP)

In another example, the two-storey western elevation of the Switch House was impacted by the 1988 forecourt construction, and has been heavily compromised by the 2013 infilling of the original void which made it a single storey building. In the assessment of this part of the site however, the Draft CMP notes (p.237) that "the exterior of the Switch House is relatively intact" and it does not provide any guidance as to whether the original form of the structure and this intrusive infill should or could be removed. Given that the Concept SSDA considers a new building in the space occupied by the Harris Street forecourt, this sort of advice is vital.







Figure 7: No idea... the Draft CMP does not provide any advice on how the Switch House has been impacted by later changes and how this could be dealt with. This is clearly a prominent part of the site that any design team will have to deal with. (Source: Draft CMP)

The assessment of the Wran Building (section 15) is even more concerning. There is no comprehensive description of the original building plan, or the changes that have been made to it. The Draft CMP does not even include original architectural drawings for the building but instead (p.273) relies on some old photocopied elevations that are referenced to the National Trust! Surely a comprehensive CMP team could have located and included the original architectural plans which are readily available from various public archives, let alone the Powerhouse's own collection. While every single other part of the site, including the Water Cooling System, is provided with a "Summary of Significance", an individual "Grading of Significant Components", a "Views Analysis" and a "Significance Grading" drawing produced by John Wardle Architects, the Wran Building is not provided with any of these assessments. Its interior is not assessed at all.

The Wran Building cannot be ignored in this document, or in this wider renewal process. The building won the 1988 Sulman Medal for Architecture, and is an intrinsic part of the entire precinct. And while since it was built some have argued over its architectural merits externally, its success as a building is noted by Andrew Metcalf when he stated that "no such quibble can be had with the real reason for visiting the Powerhouse, the interior spaces and the materials in them... Here the old and new are almost seamlessly combined and appropriately, the exhibits overwhelm its interior architecture, drawing us through a series of connected space which reveal the contents successively." The Draft CMP must assess this part of the site in the same way it has assessed every other component.

Overall, the physical analysis is insufficiently comprehensive and inadequate to inform the assessment of significance. The physical analysis considers the buildings and components in isolation, fragmenting what is one complex into elements rather than understanding the Powerhouse as an integral complex described by the original Powerhouse architect, as being 'like a town', or townscape.

The Powerhouse Museum is capable of change, but this document in its present form will not help to guide that change adequately from a heritage perspective.

National Trust recommendations

• The CMP is not sufficient for the purpose and needs substantial revision. The document has been written primarily by archaeologists and the Trust would submit that this is a significant building that requires architectural input, and would also benefit from museum/collection advice.

The National Trust of Australia (New South Wales)

³ Metcalf, Andrew, *Architecture In Transition – The Sulman Award 1932-1996*, Historic Houses Trust 1997, p.120



- The CMP needs to be for the "Powerhouse Museum", not just "The Powerhouse."
- The Wran Building must be properly assessed and appropriate conservation policies provided.
- The internal features of the museum design, both where they remain and where they could be reinstated, need to be assessed.
- The decision to individually assess components of the site has meant that the relationship between element, including the relationship between the inside and outside (eg: forecourts), has been inadequately presented.
- The design philosophy and intent behind the actual conversion of the entire site into a museum needs to be properly assessed.
- Photographs and plans of the original museum design need to be included so it can be properly considered and understood.
- The comparative analysis needs to be revised completely to include comparisons with actual
 museums, both in terms of collection (eg: the decorative arts museums of the world, including
 the V&A).

Statement of Heritage Impact

The SOHI, also prepared solely by archaeologists, is a confusing document. It is unclear what it is assessing.

The document describes (p.81) a new museum entrance at the south-east corner of the site facing the Goods Line (a sensible suggestion, particularly if the Harwood Building is included in the renewal) and describes the removal of the intrusive café kiosk, substation, and other intrusive elements. Yet when it assesses the visual impact (p.85) for this same location it includes the full impact of the maximum building envelope including a 10% design excellence bonus. The removal of current intrusive elements and their replacement with a building of the bulk illustrated is not supported.

This document fails to acknowledge the widely understood significance of the entire site – from its beginning as a powerhouse through to its instrumental 1980s adaptive reuse and use as a museum. This fundamental failure places hugely significant aspects of the place at risk of demolition or major modification to the extent their value will be lost.

The document does not truly assess the heritage impact of this proposal. For example, the Trust disagree with the assertion in the HIS (p.77) that a new building on the Harris Street forecourt to a height of 30.8m would be "consistent in height, scale and bulk with the Wran Building", when clearly the reference design is for a vertical structure of this height at the corner, as opposed to the Wran Building with its curving roof form that is greatly reduced to Harris Street. This is not to say that a new building could not be built in this location, as the HIS argues, but its *impact* must be properly considered.

National Trust Recommendation:

The Statement of Heritage Impact should be re-written following review of the Draft CMP, reconsideration of the maximum building envelopes, and review of the Visual Impact Assessment. It is only then that it can truly assess the heritage impact of this proposal.

Harwood Building

The Harwood Building is a core component of the Powerhouse Museum, however the ongoing role of this important building is unclear in this SSDA.

The Urban Design Report (p.7) notes that "no substantive works or changes in use are proposed to the Harwood Building" and the CMP notes (p.96) that "future management of the site should include



consideration of opportunities to re-incorporate the Harwood Building into the wider use of the Powerhouse site."

It is the firm view of the Trust that the Harwood Building must be considered part of the Powerhouse Museum, and included in any "renewal" project. As the CMP notes (p.22), this building was part of the original announcement by Premier Neville Wran in 1979 that the Ultimo Tram Depot and Ultimo Power Station were to become the new home of the Museum of Applied Arts and Sciences, and it was in this building that Stage 1 of the Power House redevelopment project opened in 1981.

Any museum of world-standard would benefit immensely from having such a valuable space immediately adjacent for workshops, conservation, administration, storage... the possibilities are endless. There is a perceived threat that by not including this building within the renewal project, there is a desire by the NSW Government to offload or develop this site. It must be included and will bring extraordinary benefit to this project.

National Trust Recommendation:

The Harwood Building is part of the Powerhouse Museum. Its future must be guaranteed and it must be incorporated into the precinct and into this renewal project.

Conclusion

The Powerhouse Museum and its collection is one of the most important cultural assets of the people of NSW. The unfortunate series of decisions proposing the closure of the Ultimo site, and the issues faced with the new Parramatta Museum have been damaging to this once proud institution.

The announcement that \$500 million will be dedicated towards the "renewal" of the Ultimo Powerhouse is of course warmly welcomed by the National Trust, but it must be a genuine renewal. The current proposal to focus on fashion and design will limit the extent and appeal of the Powerhouse Museum, and be the only instance of a major museum or gallery in Sydney reducing, rather than increasing, its collection display. The apparent focus on the site as a series of empty industrial shells, and not as an actual functioning museum since 1988, is a concerning starting point for renewal, as is the desire to remove and relocate its collection to Castle Hill as outlined in these documents.

These issues can all be easily resolved. Simply:

- Assess and treat the site as a museum;
- Meaningfully respect the identified heritage values of all components;
- Maintain a permanent collection;
- Include the Harwood Building in the renewal;
- Expand, rather than shrink, the examples of human creativity the museum can display.

If community concerns are heeded and incorporated into a suitable design brief for this place, then a positive result can still be achieved from this marvelous funding opportunity. If not, we risk destroying one of the most important institutions in Australia.

David Burdon

Conservation Director