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Our Ref: R/2021/10/B  
File No: 2022/542843  
Your Ref: SSD 32927319

Renah Givney  
Senior Planning Officer Key Sites Assessments  
Department of Planning and Environment

Via Major Projects Portal

Dear Renah

## **Powerhouse Ultimo Renewal – Stage 1 – Advice on Response to Submissions**

Thank you for your correspondence dated 29 September 2022 inviting the City of Sydney Council (the City) to comment on the Response to Submissions (RtS) for the above application.

We are concerned that the competition has begun before the concept plan and Guidelines are approved. The City previously raised a number of matters and design recommendations regarding various aspects of the proposal including the setting out of clear urban design and heritage conservation principles and guidelines, the reconsideration of the proposed envelope over significant heritage fabric and the relationship with the public domain and setting objectives to achieve appropriate landscaping and greening on site.

The City has reviewed the submitted RtS and notes that while steps have been taken to respond positively to concerns raised in our previous submission, a number of aspects of our previous submission have not been satisfactorily addressed.

The City raises the following subject areas for your consideration:

### **1 Urban Design Principles and Form**

#### *1.1 Building Envelope*

The RtS provides additional information including revised building envelopes (Appendix C) and revised Urban Design Guidelines (Appendix D). While the revised envelopes include the removal of any additional envelope over part of the site (Heritage Core and Former Post Office), and have been reduced above the Switch House, the City recommends that further analysis is required to determine the appropriate form of envelopes. Further analysis should include:

- a figure-ground diagram of Harris Street to understand the spatial structure along Harris street, around the site and along the peninsula
- the pattern of civic buildings and spaces in the peninsula
- an elevation of the buildings on the opposite sides of the streets that surround the Powerhouse Street block

- the view corridors across the peninsula not just views to the site

### 1.2 Revised urban design report and analysis

The City believes the RtS, particularly the revised building envelopes and Urban Design Guidelines, only go part way in ensuring any future development will have a satisfactory urban design outcome. To ensure that any future development enhances the heritage buildings on site, the spatial organisation and architectural resolution must be addressed, and a set of clear principles adopted. Further comments on the revised Urban Design Report and Analysis are provided below.

Section	Comments
1.0 Site analysis	<ul style="list-style-type: none"> <li>• Further analysis should include details as recommended in Section 1.1 above.</li> <li>• The spatial character section should address spaces in plan, section and levels.</li> </ul>
2.0 Key moves	<ul style="list-style-type: none"> <li>• To ensure that the outcome 'reveals and celebrate heritage fabric and spaces' there should be a clear set of principles. These need to address the spatial organisation and the resolution of the architecture.</li> </ul>
3.0 Urban Design Guidelines	<ul style="list-style-type: none"> <li>• The guidelines are still very general and don't address the philosophical approach to the site, the spatial organisation of the site or the resolution of the architecture.</li> <li>• For example, the Guidelines Zone 1 do not address the 'real' space. The 'space' coloured green on the plan p. 57 is not the actual 'space'. The actual 'space' has different levels and includes land to the south and east.</li> <li>• All the public 'space' indicated requires greater design consideration in plan, section and levels, if it is to have more meaning than simply as 'left over' space.</li> <li>• The Guidelines Zone 2 address alignment of buildings but do not address the requirement to have vertical walls without cantilevers.</li> <li>• An intervention such as the Boola Bardip Western Australia Museum is not considered appropriate.</li> </ul> <p><b>The Urban Design Guidelines should be accompanied by a set of principles.</b></p>

### 1.3 Reference design

The City notes the extent of building envelopes have been amended to clarify that no new buildings are proposed above the existing State Heritage Items and support this amendment.

Although not forming part of any future consent granted in this application, the City reiterates the issue of the lack of detail provided in the submitted reference design.

The reference design is important in demonstrating potential impacts, in demonstrating the application of design principles, and identifying potential opportunities and constraints. The City maintains that the reference design could better respond to the Secretary's Environmental Assessment Requirements including a Visual Analysis and Visual Impact Assessment to provide explanation and illustration of the future built form including a detailed context analysis of the Powerhouse museum buildings, their setting and views. Overall, a building of the extent proposed in the reference design could have a negative impact upon the heritage significance of the Powerhouse Museum, including its setting and views.

We reiterate that the following parcels of land identified in Schedule 5 of the Sydney Local Environmental Plan 2012 provide important visual curtilage around the heritage buildings and that insufficient justification has been provided for proposing a footprint extending over these parcels of land:

- A section of the Harris Street forecourt being the parcel of land extending from Harris Street to the Switch House, and the parcel of land extending to Macarthur Street along the entire length of the Switch House
- Zone 1 being the southeast courtyard and associated Goods Line rail tracks;
- The parcel of land to the northwest of the Boiler House extending to Pier Street and including the Pump House.

## **2 Heritage**

### *2.1 Potential extent of demolition*

Greater detail is required as to the gradings of significance in the Conservation Management Plan (CMP). Gradings should be represented in three dimensions, including through inclusion of building sections, elevations, and reflected ceiling plans. More detail is required as to the relative significance of smaller components to be demolished should be provided.

### *2.2 Heritage core*

As earlier stated, the City supports the amended building envelopes as provided in Appendix C of the RtS as they remove any proposed building envelope above the State and Local Heritage Items (except in the location of the existing rooftop mezzanine addition above the Switch House) clarifying that no new buildings are proposed in these zones.

However, the City maintains that any proposed building envelope above additional parcels of land should be carefully considered or minimised, and that to date, insufficient justification has been provided for proposing additional height over these parcels of land.

These parcels of land include:

- The whole of Lot 1, DP 631345 identified in the Sydney Local Environmental Plan 2012 Schedule
- The above includes a section of the Harris Street forecourt extending from Harris Street through to the Switch House
- A section of the Harris Street forecourt being the parcel of land extending from Harris Street to the Switch House, and the parcel of land extending to Macarthur Street along the entire length of the Switch House.

- Zone 1 being the southeast courtyard and associated Goods Line rail tracks. Any built form over the south eastern courtyard and the goods tracks could have a negative impact on the heritage listed buildings both in terms of views, setting and visual curtilage.
- The parcel of land to the northwest of the Boiler House extending to Pier Street and including the Pump House.

Our previous submission separately highlighted the significance of the views from Harris Street to the historic core that retains the legibility of the heritage items, and this retention of views was an important attribute of the 1980s Powerhouse Museum design.

Although the Powerhouse buildings, historically, did not have a frontage to Harris Street, today the existing urban arrangement and the visual relationship between the Switch House which is of exceptional heritage significance, and the dramatic southeast elevation of the Wran Building (identified in the draft CMP as being of high heritage significance), are positive and established in the streetscape as being part of the Powerhouse Museum.

The Guidelines should be updated to reference the need for an entry point on Harris Street particularly for groups arriving by buses, coaches and taxis.

It is noted that the revised Urban Design Guidelines in Appendix D specifically require views to the state listed heritage buildings and that the Stage 2 Detailed Design application will need to demonstrate how these views have been adequately addressed. However, additional views to those identified should include:

- Views from the southeast courtyard and associated Goods Line rail tracks to the heritage core.
- Views from Harris Street through to the heritage core and to the Wran building.
- Views from Harris Street and Macarthur Street to the Switch House and to the southeast courtyard.

### *2.3 Heritage curtilage analysis*

The City of Sydney maintains that the curtilage analysis is insufficient, as it does not take into account the broader visual context of the heritage listed buildings that is necessary to retain their significance, nor does it take into account the broader visual context of the Wran Building which is identified in the draft CMP as being of high heritage significance.

### *2.4 Conservation management plan*

The majority of the City's comments regarding the Draft Conservation Management Plan have not been sufficiently addressed in the amended report. On this basis, the CMP should be peer reviewed by a heritage architectural firm with the relevant experience .

It is important that the CMP is a well-structured, comprehensive document that conveys information about the site in a concise and clear manner, including to the participants of the ongoing design competition. It is important that the building and its values are understood in three dimensions through the inclusion of elevations and sections in addition to floor plans.

The City disagrees with the statement in response to our previous submission in regards the achievement of the Sulman Medal. The recognition of architectural merit entailed in the award of the medal is significant. The Powerhouse Museum project of the 1980s achieved a careful architectural integration of new and existing buildings on the site, to create a place that has inspired future adaptive re use projects across Australia. If it were not so compelling, these buildings would have been demolished. The role of an updated CMP is to re-evaluate the significance of a place, as new evidence comes to light, not only documentary and physical evidence, but also comparative values.

### **3 Landscaping and tree management**

The response provided in the RtS in relation to landscaping within the site, deep soil and canopy coverage is considered unsatisfactory and the City's comments and concerns as raised in our previous submission remain.

It is noted that there has been no change in the Urban Design Analysis and Guidelines in stressing the importance of site greening and canopy increase despite it being a NSW Government priority. Although the detailed response to submissions document in Appendix A suggests that the Urban Design Guidelines have been updated to include recommendations for minimum deep soil requirements, no such recommendation is made. Similarly, the Guidelines do not clearly set out any commitment to planting shade trees to meet urban canopy targets or to provide any greening on the roof of any new addition.

The Guidelines do not provide sufficient benchmarks or expectations that assist in guiding the ongoing design competition or a future detailed design application to demonstrate a commitment to creating public realm and open spaces with adequate shade trees planted in deep soil, species selection and layout with civic quality for gathering, wayfinding and use, nor provision of inaccessible and extensive green roofs.

The design guidelines do not meet basic planning controls for a climate responsive design and is not supported from a landscape perspective.

### **4 Transport and access**

The City notes the submission of the addendum to the transport assessment in Appendix J and comments provided by Transport for NSW in support of a collaborative design approach to any upgrades to pedestrian connections to the site via the Goods Line or from the Exhibition Centre Light Rail stop. The assessment report notes that any proposed new connection would be agreed with Transport for NSW and would be the subject of a new development application however, the City stresses the importance of providing those connections concurrently with the Powerhouse renewal project.

It is recommended that any future detailed application that includes a new connection adjacent to the Boiler House and/or upgrades to the Goods Line conduct an adequate investigation and coordinated design with Transport for NSW and Council prior to the lodgement of the detailed application.

### **5 Public Art**

The Powerhouse Preliminary Public Art Strategy currently does not meet the City's requirements for a Preliminary Public Art Plan as it does not identify locations for permanent public art opportunities, provide an estimated budget for public art or provide a program for the inclusion of artists. However, the strategy is broadly supported by Public Art as it outlines a commitment and plans to include permanent public art in the

renewal of the Powerhouse. It is recommended that a more comprehensive, updated plan be submitted with any detailed design application.

It is also noted that the strategy states that a key objective is for the Powerhouse to collaborate with First Nations and diverse communities in the development and implementation of the program. There is no evidence of this to date in the submitted plan.

The City notes that the Powerhouse intends to appoint a Public Art Curatorium and engage a curator to finalise the strategy following the Design Excellence Competition.

This potentially indicates that a qualified curator has not been engaged to prepare this strategy as requested by the City.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, A/Area Planning Manager, on 9265 9333 or at [mburge@cityofsydney.nsw.gov.au](mailto:mburge@cityofsydney.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Jahn', with a stylized flourish at the end.

**Graham Jahn** AM LFRAIA Hon FPIA  
**Director**  
City Planning | Development | Transport