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8 December 2022

Mr Michael Cassel
Secretary
NSW Department of Planning and Environment
4 Parramatta Square
Parramatta NSW 2150

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

**Powerhouse Ultimo Renewal – Concept State Significant Development Application (SSD-32927319)
Response to Request for Information**

This letter is prepared on behalf of the Applicant for SSD-32927319 (Powerhouse Ultimo Renewal) in response to feedback provided by the Government Architect's Office (GAO) in respect of the Urban Design Guidelines. A detailed response to the matters raised by GAO is provided in **Attachment 1**. Minor amendments to the Urban Design Guidelines have been made in response to the GAO feedback, which are provided at **Attachment 2**.

The responses in **Attachment 1** should be read in conjunction with the Environmental Impact Statement and the Response to Submissions and Amended Proposal Report prepared by Ethos Urban and accompanying information.

The responses provided in **Attachment 1** do not give rise to the need to revise the description of the development or any of the Mitigation Measures for the project. Should you require clarification regarding the above or in relation to any other matter relating to this project, please do not hesitate to contact the undersigned.

Kind regards,



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Attachment 1 – Response to GAO Feedback

GAO Comment	Proponent's Response
General	
Guidelines should be numbered	Any requirement that the Guidelines be numbered can be included in a condition of consent, notwithstanding, numbering will have no impact on the content or usefulness of the guidelines.
The guidelines are still very general as the site and context analysis is limited. Expand the site analysis to include:	N/A
Existing (and projected) pedestrian flows, hierarchy of site access, accessibility, connectivity throughout the site, hierarchy of activation, interfaces, and edges	<p>The Transport Assessment (Appendix J to the EIS) and Addendum Transport Assessment (Appendix J to the Response to Submissions) outlines that there is sufficient capacity within the transport network (private vehicle, public transport and pedestrian and cycling) to accommodate the projected visitation at Powerhouse Ultimo. Further the Transport Assessment demonstrates that the museum is accessed from various transport nodes, parking and walking and cycling connections from every direction surrounding the museum. Given the assessment confirms that the transport network can accommodate the project visitation, the purpose of undertaking further analysis of 'pedestrian flows' (when considered in relation to the design aspirations outlined below) is not warranted.</p> <p>The Urban Design Guidelines at Appendix D of the Response to submissions provide an analysis of existing pedestrian and cycle access points to the site (section 1.3). When read together with the Transport Assessment, this demonstrates that the site is well-serviced by existing public, private and active transport infrastructure and can easily accommodate 'pedestrian flows' to any new entry point.</p> <p>The Guidelines further provide that 'main museum access' must be included or facilitated through the Heritage Core Zone and Zone 1, with a clear and legible point of entry through Zone 2 off Harris Street. The hierarchy of site access is clearly established within these guidelines.</p> <p>The requirement to include accessibility as a key design element within all zones is included within the guidelines (noting this would also be covered by a requirement for the design to comply with the Disability Discrimination Act in addition to any guidance provided within the Guidelines).</p> <p>Connectivity through the site is dealt with by guidelines within the 'Public Realm and Open Space' requirements within each zone. It is noted that no alignments have been made mandatory, however the connection/s must be achieved. The purpose of the design competition is to allow for the myriad of ways in which such connections can be achieved, rather than by dictating a singular design outcome.</p> <p>The hierarchy of activation, interfaces and edges is dealt with through the Guidelines for each zone. It is noted that:</p> <ul style="list-style-type: none"> • The Heritage Core requires the creation and/or support for an active frontage • The Former Post Office requires the creation and/or support for an active frontage • Zone 1 requires an active frontage to the plaza • Zone 2 requires an active frontage to Harris Street
existing operations and servicing requirements of the built form	The existing operations and servicing requirements of the museum are outlined in section 3 of the Transport Assessment at Appendix J to the EIS.
private vehicle access requirements for the local properties in the immediate vicinity, including any easements for adjacent properties	There are no private vehicle access requirements through the site for local properties as outlined in the Site Survey at Appendix F to the EIS and section 2.1.2 of the EIS.

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a preliminary wind analysis to consider potential down draft effects from the student accommodation to the east of the site and ensure that areas are suitable for their intended use?	The wind impacts of the concept proposal are assessed in Appendix Q to the EIS and Appendix I to the Response to Submissions. It is noted that the concept has been determined as suitable for the intended use, noting that further assessment and potential use of mitigation measures would need to be explored during the Stage 2 SSDA. Mitigation Measure FA-3 requires the undertaking and submission of wind modelling with the Stage 2 SSDA.
surrounding residential properties that might be impacted by the proposed envelopes.	This is adequately addressed in the EIS at section 6.4.1 and the Submissions and Amendment Report within Table 6 and the revised Urban Design Guidelines and Analysis at sections 1.17-1.18.
Add guidance to note that if residential uses are permissible, any proposal must demonstrate that it achieves the objectives of the ADG, including high quality amenity outcomes including ventilation, cross ventilation, and acoustic amenity.	No residential uses are proposed and in any event the requirements of the ADG would need to be met in the Stage 2 SSDA should such uses be proposed.
The site analysis does not appear to identify nor demonstrate visual, outlook, privacy, and overshadowing impacts to surrounding residential properties by the proposed envelopes.	This is incorrect. The visual impact analysis (Appendix N to the EIS and Appendix K to the Response to Submissions) meets the requirements of the SEARs in relation to assessing the visual impact of the envelopes. The overshadowing analysis of the amended envelopes is at sections 1.17-1.18 of the revised Urban Design Guidelines and Analysis.
Public Realm and Open Space	
There is no indication of the scale of the proposed quantum of public open space in relation to the size of the site. The documentation should be accompanied by a drawing which clearly defines what 2,200sqm and 1,800sqm looks like on the site.	Drawings provided with the Building Envelope Plans are provided to scale, and these areas are readily able to be measured accordingly. This can be conditioned if required.
Update bullet point 5 – to read: ensure the open space is accessible	Suggested change made at Attachment 2 .
Update bullet point 8 to read prioritise pedestrian use	Suggested change made at Attachment 2 .
Update bullet point 9 and 15 to read: demonstrate solar access is maximised to public open spaces, and add: balancing the need for shade. The existing provision of solar access is unclear. Update the site analysis to identify the quantum of solar access the existing site achieves (and for how long). This should form a minimum commitment in the guidelines, with an ambition to increase and maximise solar access.	Suggested change made at Attachment 2 .The suggestion regarding updating the site analysis can be conditioned if required.
There is no provision to prevent the public domain from future servicing and infrastructure.	The Design Guidelines require future development to “ensure public realm is publicly accessible at all times”. It is unclear what additional provisions would be required, but nonetheless the design and management of public domain would be subject to further detailed assessment as part of the Stage 2 SSDA.
To ensure this precinct reads as a part of the City of Sydney LGA, signage and wayfinding should be consistent with the City's wayfinding strategy.	The requirement for a signage and wayfinding strategy to be developed in consultation with appropriate stakeholders could form a condition of consent. It is noted that place-specific wayfinding and signage approaches are taken within the adjacent Darling Harbour precinct and within the Goods Line, and subject to further stakeholder engagement this may be more appropriate to ensure consistency with surrounds.
Bullet point 3 under considerations should be a mandatory requirement.	Suggested change made at Attachment 2 .

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Consider including a guideline to consolidate loading and servicing functions where possible to maximise pedestrian priority and legibility and create clear separation between servicing and front of house functions.	This is adequately dealt with in each zone, noting that the guidelines were informed by operational input from the Powerhouse that led to the current drafting.
The site analysis includes very limited discussion of existing natural systems: endemic species of the area, water movement (flows, flooding) and run-off or existing landscaping or deep soil on the site. The site analysis should be updated to reflect this.	<p>Water movement- flows, flooding and run off is dealt with at Appendix V to the EIS Appendix O to the Response to Submissions. It is noted that there are no existing 'natural systems' in relation to water on the site and the reports demonstrate that runoff and flooding can be dealt with adequately during the Stage 2 SSDA.</p> <p>A Biodiversity Assessment Report Waiver was granted in respect of the project, noting the highly disturbed natural environment within the site.</p> <p>If further information is required regarding species selection, this can be conditioned, noting that the concept proposal is not reliant nor does it set limitations in terms of species selection.</p> <p>Deep soil assessment is contained within Appendix A to the Response to Submissions- refer to DPE-14 & 15 and CoS-25 & 26.</p>
There are no broad principles relating to natural systems or landscaping. The guidelines should be updated to reflect this.	Refer to Section 3.2 Public Realm and Open Space within the Design Guidelines. This can be conditioned if further detail is required within the guidelines or to be provided with the Stage 2 SSDA.
There is no indication of existing or proposed canopy or green cover. Green cover and canopy targets should be identified and be consistent with the City of Sydney's (2021) Greening Sydney Strategy (GSS). Update the site analysis to identify the existing canopy and green cover on the streets and public open space areas. Areas where targets fall short should be supported by clear analysis, justification and alternative propositions (ie green roofs) to provide shade and cooling. Guidance should be updated with clear targets and commitments.	<p>Deep soil assessment and tree canopy coverage is contained within Appendix A to the Response to Submissions- refer to DPE-14 & 15 and CoS-25 & 26.</p> <p>The requirement to integrate green roofs where possible is included in section 3.10 of the Urban Design Guidelines.</p>
Minimum tree canopy and green cover targets should be supported by solar analysis indicating these targets can be achieved.	Deep soil assessment and tree canopy coverage is contained within Appendix A to the Response to Submissions- refer to DPE-14 & 15 and CoS-25 & 26.
There is no indication of existing or proposed deep soil in the public domain	Deep soil assessment and tree canopy coverage is contained within Appendix A to the Response to Submissions- refer to DPE-14 & 15 and CoS-25 & 26.
There is no analysis of parts of the site that might accommodate deep soil or areas where soil depth might be maximised to support tree canopy and green cover	This is included at section 7.19 of the Urban Design Report- Appendix E to the EIS.
No proposed WSUD measures are included or strategies to minimise stormwater run-off	This is addressed in Appendix V to the EIS- sections 4.2-4.3.
Heritage (General)	
The site and context analysis of the Powerhouse Museum buildings and surrounds is limited. Given the heritage significance of the entire precinct and the benefit the surrounding area derives from this site, the guidelines should	<p>This is an incorrect statement. In addition to the information contained within the Urban Design Guidelines and Analysis, the concept proposal has been informed by:</p> <ul style="list-style-type: none"> View and Visual Impact Analysis (Appendix N to the EIS and Appendix K to the Response to Submissions) Heritage Impact Statement (Appendix I to the EIS and Appendix G to the Response to Submissions)

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be informed by a detailed analysis of the built form that includes setting and views.	It is also noted that there is extensive analysis of the surrounding built form, urban setting and views contained within the Urban Design Guidelines and Analysis (Appendix D to the Response to Submissions). It should also be noted that the elements of the site that are subject to heritage listing are clearly defined in the applicable statutory listings as outlined in the Heritage Impact Statement, and that not all areas of the precinct have heritage significance.
The heritage guidelines should address the history of the areas, surrounding heritage conservation areas and heritage items.	The Conservation Management Plan provides a comprehensive set of provisions that address the history of the site and surrounds. Each zone has specific heritage considerations that are required to be addressed. It is also clear that the Heritage Impact Statement and Conservation Management Plan must be addressed in the development of design solutions for the site, both of which include information and guidance on history of the area, surrounding heritage conservation areas and items.
The City (submission, 21 October 2022) recommends the creation of a clear set of heritage principles to support the Key Move: Reveal and celebrate heritage fabric and spaces. GA supports providing approach.	As outlined in the Additional Information provided to DPE 16 November 2022: The revised Urban Design Guidelines comprise 'key moves' supported by detailed guidelines. Further principles in addition to the key moves and guidelines is not considered necessary. The Guidelines as revised provide sufficient controls to ensure protection and enhancement of heritage buildings on the site and for the future Stage 2 Detailed State Significant Development Application to demonstrate satisfactory urban design as suggested by Council. The Response to Submissions sets out how the proposed concept plan exhibits design excellence. Furthermore, the revised Guidelines allow for the requisite flexibility for design excellence to be achieved as part of the design competition for the future Stage 2 Detailed State Significant Development Application. Detailed architectural proposals will be the subject of assessment as part of the future Stage 2 Detailed State Significant Development Application.
The guidelines should identify on a plan the critical views and vistas (their character and qualities) that will need to be protected.	The Guidelines are clear that there are no set views to be provided, rather views are to be provided to the Heritage Core and balanced against the need for additional built form and the potential to repurpose or adaptively reuse existing built form. This is consistent with the Department of Planning and Environment's approved Pymont Place Strategy (2021) which makes clear that the site is not affected by any critical views or vistas.
There is limited analysis or discussion of the Wran building. The guidelines should be informed by a detailed analysis of the Wran building, the achievement of the Sulman Medal, the adaptive use context and its urban setting.	Such analysis is contained within the revised Heritage Impact Statement that formed Appendix G to the Response to Submissions.
Activation	
Given the site's considerable challenges in relation to connectivity, and the creation of a connected and engaging public domain is a key move, the aspiration to improve east-west connectivity, the guidelines should address the aspiration to improve overall connectivity including east-west.	This is adequately covered, refer to Appendix D to the Response to Submissions sections: <ul style="list-style-type: none"> • 2.6 • 2.10 • 3.8 • 3.9 • 3.10 • 3.12
Earlier mention has been made regarding the intention to create fine grain activation along Harris Street. This aspiration should be clearly reflected in the guidance.	Suggested change made at Section 3.10
First Nations	
The Caring for Country principles are positive, yet not particularly site-specific or informed by a detailed analysis of place. These should be updated to reflect greater specificity of	This can be conditioned if required. The Powerhouse has a strong First Nations program that will be integrated through the design development and future programming of Powerhouse Ultimo, which includes direct engagement with wider community stakeholders.

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place and should include participation and co-design. Participation should be included at all project stages and ongoing.	
Guidance should be strengthened with clear commitments to ensure the principles can be successfully realised.	This can be conditioned if required.
Reference to 'a design' in bullet point 6 is unclear. This requires further clarification.	This refers to a design for the purposes of the Stage 2 SSDA.
Include a requirement that Indigenous Cultural and Intellectual Property protocols are valued and reinforced, and ensure that the community's right to financially benefit from this knowledge is valued and respected	This can be conditioned if required.
Include guidance that the Museum is an accessible space for the First Nation's community	It is considered that the current drafting contains such sentiment, however this can be conditioned if required.
Sustainability	
It is not clear what role the images in the Sustainability section play. Update the guidelines to include a commitment to investigate these material technologies – if this is what is intended.	The image is clearly referenced as being the eight categories that define the next decade of the built environment according to the GBCA. Appendix K to the EIS outlines how Green Star policies and commitments will be included within the project.
Heritage Core Guidelines	
Guidelines under Access, Movement and Transport and Materiality should be strengthened so that they must be addressed rather than simply considered.	Suggested change made at Attachment 2 .
Former Post Office Guidelines	
Guidelines under Access, Movement and Transport and Materiality should be strengthened so that they must be addressed rather than simply considered.	Suggested change made at Attachment 2 .
The requirement to provide an 'appropriate' curtilage is inadequate and unclear. The visual and physical curtilage of the former Post Office should be identified in the supporting CMP and HIS and stated clearly in the guidelines to ensure its protection. This should include a minimum setback from the entire former Post Office zone (that includes its ancillary open space) to ensure new elements and envelope do not dominate it.	The curtilage is clearly outlined within the HIS and CMP, being the property boundary. This has been assessed in the HIS as being appropriate and this is reflected in the envelopes to which approval is sought. The assessment has demonstrated that the proposed setbacks are supported on heritage grounds.
The objective to provide appropriate solar access lacks ambition and clarity. Update this to ensure that the existing provision is a minimum.	Suggested change made at Attachment 2 .

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Given the heritage significance of the former Post Office, the guidelines should establish clear views (derived from the CMP / HIS) from the site and /or surrounds.	This can be conditioned if required, noting that the proposed envelopes have been assessed from a visual impact and heritage impact and are supported. The requirement for views through the envelopes is not required on either visual or heritage grounds to the Post Office.
All guidelines should be strengthened so that they must be addressed rather than simply considered.	Suggested change made at Attachment 2 .
The guidelines appear very general in relation to each zone – and there are no clear provisions (views, settings, curtilage and so on), to prevent additions that might create an overbearing impact on the significance of the precinct.	This comment ignores the requirements of all documents that comprise the Stage 1 SSDA. It is not the role of the Guidelines to establish all considerations, restrictions or requirements on a design that would be subject to assessment during the Stage 2 SSDA, and they must be read in conjunction with other documents such as the Conservation Management Plan. Further this comment ignores that the proposed envelopes have been assessed against the SEARs as demonstrated by the suite of appendices to the EIS. It is incorrect to conclude that the Guidelines do not account for impacts or mitigation measures required (where relevant) from other appendices to the EIS.
The objective to provide appropriate solar access lacks ambition and clarity. Update this to ensure that the existing provision is a minimum.	The public space may not be located in the same spaces as future open space and as such a comparison with the existing situation is obsolete.
Zone 1 Guidelines	
The guideline to address the eastern edge to the light rail with respect to topography and infrastructure is unclear.	This guideline is intended to create thought in respect of the treatment of this edge condition, noting the light rail corridor and topographical challenges.
Given the heritage significance of the Heritage Core buildings, the guidelines should establish clear views (derived from the CMP / HIS) from the site and /or surrounds, for example: the Goods line rail tracks.	There is a clear requirement within the guidelines to maintain views from the Goods Line to the Heritage Core.
Form, Massing and Scale. The visual and physical curtilage of the Heritage Core buildings should be identified in the supporting CMP and HIS and stated clearly in the guidelines to ensure its protection. Clear guidelines are needed to ensure that the scale and form of any addition does not dominate the Heritage Core buildings or impact their legibility and setting.	This can be conditioned if required, noting that the proposed envelopes have been assessed from a visual impact and heritage impact and are supported. The requirements for revealing the heritage, providing views to the heritage core and maintaining legibility are adequately covered through the guidelines. The Heritage Impact Statement has considered that balancing of these factors will be required to develop a design that can ensure an acceptable heritage response.
Provide a legend to understand the numbering associated with the extract from the Pyrmont Peninsula Place Strategy.	This can be conditioned if required, however, users of the guidelines can also readily access the Department of Planning and Environment's website (Planning Portal) to access and understand the full details of the Pyrmont Peninsula Place Strategy.
Zone 2 Guidelines	
The guidelines lack clarity in relation to the: <ul style="list-style-type: none"> • Wran building, refer general heritage comments above. • The significance of the existing urban setting which affords a clear view of the heritage core from the surrounding public domain. 	The Stage 1 SSDA has assessed the impact of the proposed envelopes, including potential impacts on the Wran Building. There is a requirement within the Guidelines for views to the Heritage Core to be retained through this zone, however the location or extent of such a view is not prescribed.
Zone 3 Guidelines	
The aspiration for this zone to enable a direct connection with the Pier Street underpass appears to be challenged by limited	The Applicant can only undertake works on land within its ownership and within the project boundary. The EIS identifies the extent of land which is within the site boundary and the Applicant's control, as well as the ownership of surrounding land. It is clear from the

GAO Comment	Proponent's Response
analysis of the connection in terms of ownership, physical constraints, interfaces, and opportunities etc.	application that there is a commitment to work with other parties to progress the potential for such a connection, noting no further analysis will assist in achieving an outcome in this regard.
The Setbacks and Built Form Expression section should be expanded to address the visual / physical curtilage and setting of the adjoining Heritage Core fabric and include guidance relating to its protection and to ensure that any proposal does not dominate the Heritage Core buildings or impact their legibility and setting.	It is unclear how such a limited envelope in this location could dominate the Heritage Core when it will not be seen from any vantage point apart from looking down from the Pier Street overpass.
Expand on what is meant by 'managed access' – including when and how this connection might be restricted and by what means?	This can be conditioned if required, but is more appropriately dealt with in the future assessment of specific proposals as part of the Stage 2 SSSA.
This section should list the aspirations set out in the Pymont Peninsula Place Strategy (PPPS)	It is expected that the NSW Department of Planning and Environment, as both the assessment authority for the future Stage 2 SSSA and the author of the Pymont Peninsula Place Strategy, is more than capable of assessing consistency with the Place Strategy as part of future applications without the need for this change. Nonetheless this can be conditioned if required.