ETHOS URBAN

30 November 2020

2190947

Mr Jim Betts Secretary Department of Planning, Industry and Environment 12 Darcy St Parramatta NSW 2150

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

Dear Amy,

Response to Further Agency and Organisation Submissions Powerhouse Parramatta – SSD 10416

This letter is prepared on behalf of Infrastructure NSW in response to the matters raised in relation to the Response to Submissions for SSD DA 10416 by government agencies, adjoining landowners and community organisations. A detailed response to the matters raised in submissions received from the following organisations is provided in **Attachment 1:**

- Transport for NSW
- · Sydney Water
- City of Parramatta Council
- NSW Heritage Council
- Endeavour Energy
- Heritage NSW Aboriginal Cultural Heritage Regulation
- · Australian Unity Office Fund
- · Save the Powerhouse
- · Submissions received from 18 members of the public

The responses in **Attachment 1** should be read in conjunction with the Response to Submissions and Amended Proposal Report prepared by Ethos Urban and accompanying information dated 8 October 2020, and the further Additional Information Response prepared by Ethos Urban and accompanying information dated 2 November 2020.

In addition to the response to the matters raised in the submissions response, the following sections provide clarity on matters relating to the continuing assessment of the application.

Design Excellence

In light of the design amendments arising from the retention of the St George's Terrace outlined in the Response to Submissions, **Table 1** below provides an updated assessment of the project's attainment of design excellence having regard to the matters raised in Clause 7.10(4) of the Parramatta Local Environmental Plan 2011, which demonstrates that the development as amended continues to demonstrate design excellence.

Table 1 Assessment against Clause 7.10(4) of Parramatta Local Environmental Plan 2011

Provision	Response
` ,	The building articulation is characterised primarily by the light coloured steel latticework which envelopes the building mass. Its consistency in material, expression and detailing provide a unified character.

Pro	vision	Response
	materials and detailing appropriate to the building type and location will be achieved,	The structural lattice, which is the main element of the architectural expression, differs from level to level, adding to the recognisable character of each, and becoming lighter as it moves up. Complementing the efficient and flexible steel lattice structure, the materiality of walls in the solid parts of the building link back to the land, the site, and Country. The proposal seeks to create a unique and site-specific earthy material, with aggregates that could be found on the site, and pigments of White Ochre, a significant and very symbolic substance in aboriginal culture. Retention of the St George's Terrace provides for a transition between the existing fabric of the streetscape with the modern new addition, providing a contemporary juxtaposition between the retained terraces and the main buildings of this important modern cultural facility.
(b)	whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,	The building seeks to provide a public internal facility while framing a new and exciting public domain at the river foreshore which is cohesively tied to the existing network of public spaces. The building is further characterised by visual and physical transparency. The arrangement of spaces enables public movement throughout most of the building starting with a highly permeable ground plane supported by active retail to a publicly accessible rooftop on top of the eastern building and an elevated external terrace in the western building.
(c)	whether the proposed development detrimentally impacts on view corridors,	The proposal does not impact view corridors identified in the planning framework, including in the Parramatta DCP 2011. In relation to other view corridors identified through site analysis, the visual impact assessment finds that the proposal: — does not impede linear views along the Parramatta River corridor or its associated parklands. — continues the strong built CBD edge to the river established by the adjoining aspire complex, serving to better define the river corridor as a distinct view corridor. — maintains the existing view corridor between the CBD and river via Dirabarri Lane. — creates a new view corridor at the ground plane between the CBD and river through the extension of the Civic Link aligned with Horwood Place.
deve	how the proposed elopment addresses the wing matters—	Refer responses below
(i)	the suitability of the land for development,	The proposed Powerhouse Parramatta museum is compatible with the current zoning of the site and is consistent with adopted strategic planning documents including Parramatta CBD Planning Strategy 2015.
(ii)	the existing and proposed uses and use mix,	The immediate context of the site comprises a range of land uses including office premises, retail premises, hotel, serviced apartments and residential apartments. To the north is the Parramatta River and open space corridor, beyond which are predominantly residential uses. The Riverside Theatre is located to the north-west across the Parramatta River. Retention of the St George's Terrace will allow for the adaptive reuse and incorporation of new uses associated with the Powerhouse Parramatta. The proposed development is permissible within the current zoning of the site and complements the diverse urban uses in the surrounding precinct.
(iii)	any heritage and archaeological issues and streetscape constraints or opportunities,	A process of investigation, consultation and assessment with regard to Aboriginal cultural heritage, Aboriginal archaeology, European cultural heritage and archaeology was undertaken for the Powerhouse Parramatta study area and proposed development works. The potential impacts were evaluated and mitigation measures are proposed. These include heritage interpretation, further archaeological investigation, and conservation methodology. The decision to retain the St George's Terrace will minimise impacts on this local heritage item and allow for the restoration and adaptive reuse of these buildings in conjunction with the new facility. For further detail please refer to the Statement of Heritage Impact, Aboriginal Cultural Heritage Assessment Report and Heritage and Historical Archaeological Research Design report.
(iv)	the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation,	The proposed building pair sits below the maximum height for the site with a higher Western building and step down to the Eastern Building. The height and stepped composition of the pair provide a transition from the higher Meriton towers to the North East to the smaller developments East of Wilde Avenue.

including the

permeability of any

pedestrian network,

frameworks.

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developed in line with the Parramatta CBD Pedestrian Strategy 2017 and other corresponding

For patrons and visitors to Parramatta arriving by ferry, Powerhouse Parramatta, by way of its

positioning, urban design and visual presence, can also serve as the gateway to the broader city.

Provision F		Response	
		From all directions, the development functions as an urban filtering device, enriching the public domain experience of both visitors and passers-by.	
(x)	the impact on, and any proposed improvements to, the public domain,	The permeability of the site establishes connections with the adjacent public and civic venues including Parramatta Riverside Theatres, Bankwest Stadium, Prince Alfred Square, Parramatta Town Hall, Western Sydney University and Westfield Parramatta. The landscape treatment also integrates with a broader network of public open space, including the Parramatta River Corridor, Parramatta Square, Parramatta Park and Lake Parramatta. These connections and significantly the presence of Powerhouse Parramatta is formative in creating a cultural precinct along the Parramatta River, connecting public space of the city back to the water's edge.	
(xi)	the impact on any special character area,	The direct physical and visual connections between Powerhouse Parramatta, the park and Parramatta River, invite users to interact with the river landscape. Visitors to Powerhouse Parramatta come across different opportunities to engage with the river, from the riverfront to panoramic views from the terrace and rooftop.	
(xii)	achieving appropriate interfaces at ground level between the building and the public domain,	Powerhouse Parramatta offers a series of connected public domain spaces. The terrace extends north from Presentation Space 1, providing an elevated platform for the public to congregate and take part in open air activities. This public space acts as a focal point for activity and consequently supports and reinforces activation across Powerhouse Parramatta. The riverfront extends under the terrace providing an opportunity for shaded and weather protected space. The volume of this space also supports a resilient design for the site and for the city, by accommodating flood waters in accordance with flood modelling requirements. A concentration of retail and front of house uses positioned on either side of the Civic Link work togethe with the passive framing provided by the building and overhead bridge to create a unique sense of place. One that responds to the urban context of the city and the more natural setting of the Parramatta River. Dirrabarri Lane positioned at the western edge of Powerhouse Parramatta, supports the establishment of a network of laneways and public spaces which stitch Powerhouse Parramatta into the surrounding urban fine grain. Retention of the St George's Terrace on Phillip Street will conserve and adaptively	
(xiii)	excellence and integration of landscape design.	Powerhouse Parramatta's ground plane serves as a seamless continuation of the surrounding streetscape and public domain. An inviting, barrier free, urban lounge, openly welcoming visitors in. It acts as a central place in the urban fabric, a destination for pause and reflection. The controlled porosity of Powerhouse Parramatta, and its mixture of uses, contributes to a secure day and night-time community. Powerhouse Parramatta precinct offers a safe place for all members of the community to meet, engage and inform its evolution.	

SEPP 19 - Bushland in Urban Areas

As outlined in the BDAR Waiver Request (Appendix K of the EIS) and the Arboricultural Impact Assessment (Appendix J of the EIS), vegetation on the site has been highly modified with the majority of vegetation having been planted as part of formal site landscaping with a mix of native and exotic species. Only two trees present on the site (Trees 1 and 2) are considered to be possibly remnant vegetation, both of which are located within highly modified landscape settings on land zoned RE1 Public Recreation along the northern edge of the site. Tree 1 is a Sydney Blue Gum located near the Lennox Bridge which is proposed to be retained, whilst Tree 2 is a Swamp Oak which is proposed to be removed to facilitate improved pedestrian access and new landscaping. These trees are isolated from nearby vegetation, are surrounded by formal exotic turfed areas and adjoin the concrete-formed river edge, and accordingly do not bear the any of the structural or floristic characteristics of natural vegetation. Accordingly, the vegetation present on the site is not considered to be bushland for the purpose of SEPP 19.

Compliance with development standards

The proposed development as amended to facilitate the retention of the St George's Terrace continues to be wholly compliant with the FSR and maximum building height development standards applicable under the Parramatta Local Environmental Plan 2011.

Groundwater

JK Geotechnics have provided Geotechnical Advice Statement (Attachment 2) to respond to the Secretary's Environmental Assessment Requirements in relation to groundwater which confirms that the proposed development

will have not have any adverse impact on regional groundwater levels, rates of groundwater flow, groundwater flow paths, or groundwater quality.

Conclusion

The responses provided above and in **Attachments 1** and **2** do not give rise to the need to revise 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.

Yours sincerely,

Albuneand.

Anna Nowland

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Attachment 1 – Response to Submissions

Extracts from public authority submissions and submissions from organisations, including stakeholder and interest groups, received in relation to SSD-10416 and a response to each of these matters has been provided in the sections below.

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1.0 Public authorities

The following tables include a response to the full text of submissions provided by or on behalf of public authorities/agencies, as defined by DPIE in the categorisation of submissions on the Major Projects website. The full text of each submission is provided in the left-hand column, accompanied by the proponent's corresponding response in the right-hand column. The proponent's responses have been informed by input by the consultant team, and should be read in conjunction with the publicly exhibited Environmental Impact Statement and accompanying technical reports, as well as the Response to Submissions (RTS) Report to which this document is appended.

1.1 Transport for NSW

No.	Extract	Comment
TfNSW1	The RtS report and its relevant supporting documents have been reviewed. The applicant has identified a list of mitigation measures (Table 4 of the Response to Submissions and Amended Proposal Report, Version 5, dated 8 October 2020) and these proposed mitigation measures are considered to have largely addressed the comments raised in our previous submission. Recommended conditions are provided in TAB A for consideration by the Department.	Noted.
TfNSW2	Interface with Parramatta Light Rail works Prior to issue of a relevant construction certificate or preparatory, demolition or excavation works, the applicant shall consult with Parramatta Light Rail (PLR) project (DA.PLR@transport.nsw.gov.au) within TfNSW to coordinate any interfacing works that will affect the PLR project. Reason for condition: To ensure coordination with the PLR works and protect any utilities that have been relocated and/or installed by PLR.	Noted – the proposed condition is accepted.
TfNSW3	Construction Pedestrian and Traffic Management Plan Prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier, the applicant shall: • Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. The CPTMP should specify matters including, but not limited to, the following: • A description of the development; • Location of any proposed work zone(s); • Details of crane arrangements including location of any crane(s) and crane movement plan; Haulage routes; • Proposed construction hours; • Predicted number of construction vehicle movements, detail of vehicle types and demonstrate that proposed construction vehicle movements can work within the context of road changes in the surrounding area, noting that construction vehicle movements are to be minimised during peak periods; • Construction vehicle access arrangements;	Noted – the proposed condition is accepted.

construction staging; • A detailed plan of any p	and construction methodology, including any	
A detailed plan of any p		
	proposed hoarding and/or scaffolding;	
 Measures to avoid con: 	struction worker vehicle movements within the CBD;	
Consultation strategy for	or liaison with surrounding stakeholders, including der construction and Parramatta Light Rail Builder;	
services and any light r vehicles during the con	npacts to general traffic, cyclists, pedestrians, bus rail within the vicinity of the site from construction struction of the proposed works. Proposed mitigation early identified and included in the CPTMP; and	
projects within or arour Rail Project, Sydney M measures to minimise t	construction activities of the development and other and the development site, including the Parramatta Light etro West Project and private development. Proposed the cumulative impacts on the surrounding road urly identified and included in the CPTMP;	
Submit a copy of the fire	nal plan to TfNSW for endorsement; and	
impacted by the construction in real time	rect contact number to small businesses adjoining or uction work and TfNSW to resolve issues relating to freight, servicing and pedestrian access during e. The applicant is responsible for ensuring the number is current during any stage of construction.	
Reason for condition		
	ned construction activities of the development and be appropriately managed to minimise disruption.	
TfNSW4 Prior to the Issue of the O	ccupation Certificate	Noted – the proposed condition is accepted.
Coach Management Plan		
of Parramatta Council and for endorsement, prior to t consider all visitor groups schools) and concurrent e outcomes of investigations and drop-off and outer-CB	e a Coach Management Plan in consultation with City ITfNSW and submit a copy of the final plan to TfNSW he issue of the occupation certificate. The plan shall (including simultaneous visiting groups from multiple vents within the development. The plan shall detail the s of opportunities to provide coach passenger pick-up BD coach layover parking facilities for the development. but not be limited to, the following:	
volumes by vehicle size	nent's coach profile, including the forecast coach traffic e, frequency, time of day and duration of stay;	
	nger pick-up/drop-off and outer-CBD layover parking oport the demand of the development;	

No.	Extract	Comment
	 Details of how use of the coach passenger pick-up/drop-off and layover parking facilities would be managed so as to minimise impact to general traffic, bus operations, cyclists and pedestrians; 	
	 Management of coach queuing at coach passenger pick-up/drop-off and layover parking facilities, including details of alternate coach passenger pick- up/drop-off and layover parking locations to redirect coaches due to extensive queuing and how this would be managed; and 	
	 Measures to manage passengers queuing to board coaches, including school students, to minimise impacts to footway pedestrian flow. 	
	The plan (and any updates to the plan), shall be implemented and adhered to at all times by the applicant following the issue of the occupation certificate.	
	Reason for condition	
	To ensure the coach passenger pick-up and drop-off and outer-CBD coach layover parking facilities are appropriately managed to support the demand of the development.	
TfNSW5	Point to Point Transport Management Plan	Noted – the proposed condition is accepted.
	The applicant shall prepare a Point to Point Transport Management Plan in consultation with City of Parramatta Council and TfNSW and submit a copy of the final plan to TfNSW for the endorsement, prior to the issue of the occupation certificate. The plan shall consider concurrent events within the development and patrons using taxi, kiss and ride, rideshare services and minibus to access and depart the development. The plan shall detail the outcomes of investigations of opportunities to provide passenger pick-up and drop-off facilities for point to point transport services for the development. The plan should specify, but not be limited to, the following:	
	 Details of the development's point to point transport profile, including the forecast point to point transport vehicle volumes by vehicle size, frequency, time of day and duration of stay; 	
	 Details of point to point transport passenger pick-up/drop-off facilities that would support the demand of the development; 	
	 Details of how use of the point to point transport passenger pick-up/drop-off facilities would be managed so as to minimise impact to general traffic, bus operations, cyclists and pedestrians; 	
	 Management of vehicle queuing at point to point transport passenger pick- up/drop-off facilities, including details of alternate point to point transport passenger pickup/drop-off facilities locations to redirect vehicles due to extensive queuing and how this would be managed; and 	
	Measures to manage passengers queuing to board point to point transport services to minimise impacts to footway pedestrian flow.	

No.	Extract	Comment
	The plan (and any updates to the plan), shall be implemented and adhered to at all times by the applicant following the issue of the occupation certificate. Reason for condition	
	To ensure passenger pick-up and drop-off facilities for point to point transport services are appropriately managed to support the demand of the development.	
TfNSW6	Green Travel Plan	Noted – the proposed condition is accepted.
	The applicant shall prepare a comprehensive Green Travel Plan for the development in consultation with TfNSW. The applicant shall submit a copy of the final plan to TfNSW for endorsement, prior to the issue of the occupation certificate. The plan is required to:	
	 Identify strategies and mechanisms, including mode share targets that encourage and promote sustainable transport use such as public transport, walking and cycling and reduce the proportion of single-occupant car journeys to the site, considering all employees and visitors to the development, including school groups. 	
	 Include a Transport Access Guide that provides information to visitors and staff about the range of travel modes access arrangements and supporting facilities that service the site; and 	
	 Nominate the party/parties responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets. 	
	The plan (and any updates to the plan), shall be implemented and adhered to at all times by the applicant following the issue of the occupation certificate.	
	Reason for condition	
	To develop a site specific travel demand management plan to help mitigate impacts on the transport network.	
TfNSW7	Loading and Servicing Management Plan	Noted – the proposed condition is accepted.
	The applicant shall prepare a Loading and Servicing Management Plan in consultation with TfNSW. A copy of the final plan is to be submitted to TfNSW for endorsement, prior to the issue of the occupation certificate. The plan should specify, but not be limited to, the following:	
	 Details of the development's freight and servicing profile, including the forecast loading/service vehicle traffic volumes by vehicle size, frequency, time of day and duration of stay; 	
	Details of loading/servicing vehicle bays within the site that would be used to adequately accommodate the forecast loading/servicing vehicle traffic volumes of the development (including long dwell time loading/service).	

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No.	Extract	Comment
	warranted by demand. The provision of bicycle facilities for visitors and staff of the development should align with the mode share targets within the Green Travel Plan.	
	Reason for condition	
	To ensure the adequate capacity is provided to support the mode share targets.	

1.2 Sydney Water

No.	Extract	Comment
SW1	Thank you for notifying Sydney Water of the RTS for the Powerhouse Parramatta SSD-10416). We have reviewed the proponent's response to our individual submission and are satisfied that our advice will be adhered to.	Noted.

1.3 City of Parramatta Council

No.	Extract	Comment
CoP1	Flooding and the Undercroft Council recognises the efforts made to modify the design to align with the Competition winning visualisation that showed a landscape solution that included a sloping embankment and a seamless relationship with the Parramatta River. Notwithstanding, the reality of the design is that the undercroft remains and the embankment serves to obscure it. The primary purpose of the undercroft is to convey floodwaters and at the same time provide additional habitable floor space for use by the Museum. Council maintains its view that the undercroft is not an appropriate solution for the site. In the Response to Submissions Report prepared by Ethos Urban on behalf of Infrastructure NSW dated 8 October 2020, it states that in response to concerns raised during the exhibition period, further detailed flood modelling was undertaken which confirmed that 'the proposed undercroft area is the best and only outcome for the site to mitigate and appropriately manage riverine flooding'. Council is contrary to this view. While Council acknowledges that the undercroft space will have limited access by the public through the erection of moveable screens managed by the Powerhouse, Council maintains its concerns regarding the suitability of the undercroft also passes through proposed habitable floor space. This is due to the potential threat to life, property and critical building services in a flood event (including evacuation via a single, limited capacity lift, which provides critical access to mobility impaired). Council considers this to be in contradiction of the	As outlined in the Response to Submissions and accompanying Flood Risk and Stormwater Management Addendum Report, the Applicant maintains that there is no alternative to the inclusion of the undercroft whilst maintaining the architectural design of the museum. Adjustments have been made to the undercroft, in particular in relation to its use and management in response to Council's concerns, however, it is noted that contrary to this submission the undercroft is not considered to be habitable floor space. Flood modelling and advice confirms that the undercroft is a suitable flooding response. The Applicant maintains that the design and operation of the undercroft as well as the broader Powerhouse Parramatta proposal remains appropriate and safe from a flooding perspective. The concerns identified in Council's submission have been previously addressed in detail in the Response to Submissions and accompanying Flood Risk and Stormwater Management Addendum Report, and the responses in these documents should be referred to.

No. Extract Comment

Floodplain Development Manual and NSW Flood Policy. This space will have a level floor and the 1% AEP (100 year) floodwaters will flow with substantial velocity 2-3m deep extending to the back wall of this structure.

It is Council's view that there are alternative solutions, including a design that delivers an alternative means of achieving floodwater conveyance along the river through an appropriately designed landscaped riverbank. There are other reaches of the river nearby with similar river flow, river width and which have cross sections that contain this 1% (100 year) flow within the boundaries. These typically have sloping banks that enable people to safely find their way to higher ground out of the river corridor as floodwaters rise.

In this regard, Council reiterates its earlier recommendation that the undercroft be removed from the design. It also recommends the undercroft be replaced with a suitable sloping riverbank section that may be a viable solution to manage the conveyance of floodwater. This would also have the added benefit of creating a more integrated foreshore landscape interface where the 'natural' sloping riverbank profiles that existed before the existing car park was originally constructed (and which appear to be still visible on site) could be considered as the baseline for predevelopment conveyance capacity and afflux considerations.

In relation to overland flow, once riverine flooding and conveyance has been resolved safely - by changing the built form and surrounding landform, it will also be necessary to re-examine the overland flow pathways across the site and how these affect useability, public safety and risk management.

CoP2 Public Domain

Related to the undercroft and flooding, is the public domain response. The proposal includes an extensive podium that acts as a cover to the undercroft, separating the museum from the river foreshore and dividing the space into two disconnected spaces. This results in a podium landscape which is constrained in is ability to deliver an integrated flood conveyance solution. Council understands that the purpose of the podium landscape relates to museum programming in the external space, including potential exclusive use periods with fencing and ticketing dividing the site.

The implication of the proposal is that this creates:

- Sharp transition disconnecting the river foreshore from the Museum and River Square public space;
- Inability to achieve a public, accessible and connected River Square with seamless transitions to adjoining areas (as envisaged in the Parramatta City River Strategy);
- Difficulties in achieving universal access, legible and intuitive way finding to and from the River foreshore to the Powerhouse Parramatta;

- The amended design provides a sloped embankment that seamlessly bridges the level difference between the riverfront promenade and the PS1 terrace, allowing the Civic Link to extend northward and connect directly to the river front.
- Powerhouse Parramatta will deliver a precinct that has multiple entry points and can be approached and connected from all sides, so that visitors and local communities will be encouraged to walk through the site.
- The proposed stairs, lift, and ramps providing in the public domain is an appropriate response that supports permeability and accessibility, and has been assessed by Morris Goding Access Consulting to confirm that the site will achieve the relevant standards and requirements.
- The public domain areas are also intended to support free access, circulation, and ephemeral smaller civic, community and cultural functions that can occur concurrently with other activities and exhibitions and are non-transactional (i.e. no purchased tickets). Events hosted in the public domain outside of the typical day to day operations of Powerhouse Parramatta will be subject to separate and future approval. These could comprise activities hosted by the Powerhouse or other parties such as City of Parramatta Council, and will consider emergency and event access to the river foreshore within the site and how access to the site will be secured, if required.

No.	Extract	Comment
	High likelihood of not being able to conserve any of the sensitive Historic or Aboriginal Archaeology on site; and	
	 A departure from the commitment by INSW and the original intent to deliver a free and accessible community space that is readily accessible with flexible uses 	
	If the undercroft was removed, Council sees an opportunity to redesign the interface between the buildings and the surrounding public space, replacing significant vertical transition with a sloped or terraced landscape form more reminiscent of the competition scheme. This approach is likely to improve connections between the Museum and river foreshore, and provides opportunities for a range of civic events more in keeping with River Square public space envisioned in Parramatta City River Strategy.	
CoP3	Civic Link	It is not possible to provide a paved ramp precisely at the termination of the Civic Link, as the
	Council recognises the proposal seeks to address many of the objectives of the Civic Link noting that the design uses a more-urban response along this riverfacing block. These include providing a new pedestrianised public space, significant civic space, and cultural destination that supports public life; through its generous public space that can accommodate major events; and through its distinctive public building adjacent the river foreshore.	length of the ramp required in this location would not result in an equitable accessible outcome. Physically connecting the upper and lower levels of the site via the Civic Link is achieved via a sloped embankment as well as a generous public stair and lift available to the public 24/7, with a separate ramp connecting Dirrabarri Lane to the foreshore.
	Council acknowledges the retention of a tree from the Willow Grove landscape along the Civic Link spine, and that a portion of the Civic Link has narrowed to 11.5m for a length of 11.3m in response to architectural requirements and that the spatial intent is of 'containment and release'. While Council acknowledges that for the greater extent of the link, a 20m width and open to the sky character is proposed, Council reinforces its aspirations for a continuous 20m wide open to sky link. Noting the proposed reductions to the building footprint to accommodate an increased setback to the river foreshore and to the Phillip Street frontage to enable retention of St George's Terraces, further flexibility in the programming of internal floor space and building footprints would enhance the cumulative benefit to the public domain and realise the aspirations for this important Civic spine.	
	Whilst the public domain design has been amended, Council remains concerned that the Civic Link terminates in a stair, as opposed to the gentle ramp proposed in the competition winning design. This change in design response no longer achieves a fully public and universally accessible Civic Link connecting Parramatta Square to the River foreshore. The consequences of this are that Museum access from the foreshore is limited to mechanical means (a lift accessed from within the undercroft) and noncompliant access (shared with vehicles, loading and servicing) via Dirrabarri Lane.	
CoP4	George Khattar Lane and Council owned land	The proposed turn around and parking facility was developed in response to Council's submission to the EIS exhibition. The Applicant commits to ongoing consultation with Council

No.	Extract	Comment
	In response to the changes to the design of the Phillip Street frontage and the incorporation of some of the vehicular drop-offs for point to point transport and accessible parking spaces via George Khattar Lane, there are a number of considerations for this design resolution, noting that the proposal relies upon retention of this Council owned vehicular access lane.	regarding this matter, noting that the project is not reliant on drop off or accessible parking within this location.
	Due to the loss of the western portion of George Khattar Lane, Council requests details of a turnaround facility and confirmation that these works will be completed as part of this project and considerate of Council's aspirations to realise a well-designed river foreshore. The plans submitted as part of the response to submissions show a formal parking area for five (5) x accessible parking spaces and approximately seven (7) x drop off & pick up parking spaces. Whilst the commitment to complete the turnaround works is welcome, the proposal to create a formal parking area is not supported by Council, and not considered an acceptable solution for the provision of disabled parking. Conditions should be imposed requiring the completion of the turnaround facility and details be submitted to and approved by Council.	
	Council also raises more general concerns for new works proposed beyond the Powerhouse site, such as George Khattar Lane, the public domain along the river foreshore and rights of way for access. The lack of clarity regarding the interface with Council owned-land, integration with broader public domain strategies along the river foreshore, future ownership, accessibility, dedication, and maintenance of such land, is a concern for Council and requires resolution.	
CoP5	Bus Parking Council acknowledges the aspirations for visitors to the museum relying upon increased patronage of public transport. However, the limited provision for bus parking raises concerns when correlated with the anticipated number of daily visitors, in particular school groups and seniors, who are less likely to rely upon mass transit options. Further consideration of the potential impact of this requested.	Coaches will be managed in accordance with the Coach Management Plan to be prepared in consultation with Council and endorsed by TfNSW prior to the occupation of the site

1.4 Heritage Council NSW

No.	Extract	Comment
HC1	The EIS identified there was potential for the project to achieve a connection to the Lennox Bridge via a new pedestrian ramp through a laneway between the site and Church Street. It recommended that detailed design should ensure the connection was designed to avoid impact to the item (Advisian SOHI 2020: 96). The Ethos Urban RTS Amended Proposal Report (2020, p31) has gone on to advise this proposal is not 'critical to or proposed as part of the development and would be subject to separate and future approvals by others.' It goes on to clarify	

No.	Extract	Comment
	the project would include a 'river foreshore path [to] complement and retain the bridge's existing relationship to the public domain'. It is noted however that the SSD site boundary extends to the southeastern extent of the Lennox Bridge. HNSW therefore recommends to DPIE that a condition would be appropriate to ensure protection and management of this State significant heritage item during the project. If a modification is proposed in future, additional assessment and detailed design should be undertaken to ensure no impact occurs from the project to the significance of Lennox Bridge as a result of a proposed interface or connection.	
HC2	The potential heritage significance of the Art Deco Substation No 16 (at 42 Philip Street) was questioned at EIS stage. The Addendum HIS prepared by Advisian 2020 has clarified the item is of local significance, although not listed under the Parramatta Local Environmental Plan 2011 (PLEP). HNSW recommends the project considers the item as a locally significant item. Accordingly, the Project should respond to the advice of the City of Parramatta Council (CoP), who are responsible for providing guidance on local heritage items. HNSW understands that management of the locally listed items in the study area should respond to the provisions established by Clause 5.10 of the PLEP.	Noted.
HC3	The project's Heritage Interpretation Strategy (HIS) sets out a high-level approach to the interpretation of the site and its historical development in the context Parramatta. It sets out four stages required to deliver a final interpretation outcome for the project which would integrate interpretation into the design elements of the project. This is consistent with Heritage Council guidelines. The HIS explains there is an intent to maintain and expand on the original Museum of Applied Arts and Sciences at Powerhouse Parramatta. HNSW recommends that the final interpretation outcome should ensure that any archaeological results are addressed in a meaningful way at the site.	Noted.
HC4	Historical Archaeology HNSW has reviewed the Addendum Historical Archaeological Assessment prepared by Curio Projects, which considered design changes arising from project amendments. Curio found a likelihood that local and state significance archaeology may be impacted by the amended design set out in the RTS. Historic archaeological remains include potential evidence of Colonial occupation which date from 1804 and that would be of State significance.	Noted.
HC5	The Amended ARD reiterates advice from the EIS that the preferred approach and intent of the project is to redesign to avoid impacts to significant archaeological resources. The Delegate of the Heritage Council supports this preliminary approach which involves a phase of testing to clarify location, integrity and significance and inform design. Where required, testing would be followed by 'open area' salvage (e.g. if avoidance is not possible). The Heritage Council agrees that salvage excavation would be the most likely scenario if	Noted.

No.	Extract	Comment
	significant archaeology survives at the site and cannot be avoided by the final design.	
	Prior advice from the EIS stage that an amended ARD would be required to support an archaeological salvage phase of excavation remains valid. A condition is recommended for this requirement. The Heritage Council also recommends conditions around the need for a final excavation report as the outcome of any archaeological excavations conducted. This is consistent with requirements under s146 of the Heritage Act 1977.	
	The historical archaeological methodology for excavation should also ensure that it adequately addresses the recording and investigation of Aboriginal objects which may be identified in a post-1788 setting. This may include evidence of 'post contact' archaeology. Amendment to the Addendum Historical Archaeological Research Design may be required to be consistent with the Addendum Aboriginal Cultural Heritage Report which included management of historical and Aboriginal archaeologies in a combined approach. It is noted that the existing ARD includes the potential for post contact evidence as a research question but does not clearly set out a process for its recording under the historical archaeological program. That should be amended in the ARD because Parramatta as an early colonial township retains evidence of coexistence of Aboriginal people and Colonists and this potential may exist at this site. This amendment should occur before any archaeological testing on site.	
	HNSW notes again the likelihood of evidence of the Parramatta Sand Body (PSB) part of which is listed on the State Heritage Register as the 'Ancient Aboriginal and Early colonial landscape' (SHR 01863) at Robin Thomas Reserve. While separate advice will be provided by HNSW specific to the Aboriginal Cultural Heritage regulation, the PSB is listed to a large degree as a rare geomorphological body, specific to Parramatta. It is likely that excavation for this project would result in physical impacts to this layer which cannot be avoided. If an archaeological conservation outcome is forthcoming from this project during design stages, this may also retain evidence of the PSB in part within the site. That would be an appropriate management strategy for the PSB, if found. Where works would impact the PSB, HNSW supports the proposed investigation of it and comparative analysis with other parts of the Parramatta Sand Body by a geomorphologist. That may enable testing of results from across the PSB including investigations at several SHR sites such as Parramatta Park and Old Government House; Parramatta North (Cumberland District Hospital Group) and at Robin Thomas Reserve by the Parramatta Light Rail.	
HC6	If the Department of Planning, Industry and Environment determines it is appropriate to approve this SSD, the following conditions of consent are recommended to manage the above aspects of this project:	Noted – the proposed condition is accepted.
	Historical Archaeological Management	

No.	Extract	Comment
	1. The project must endeavor through detailed design to avoid physical impacts to state significant historical archaeology by the proposal, including the use of existing disturbed areas of the site. To achieve this outcome, the final design shall be informed by a program of archaeological testing. The testing shall aim to understand the nature, extent and significance of the surviving archaeological deposits as set out in the project's historical archaeological assessment and research design and addendum.	
HC7	2. If testing identifies an archaeological resource of significance (local, State or both) which cannot be avoided through detailed design, the project shall undertake archaeological open area salvage. This must be supported by a revised historical archaeological research design and excavation methodology (HARDEM). The HARDEM shall be prepared ahead of the salvage stage and submitted for comment and adequacy to the Heritage Council of NSW prior to final approval by the Department of Planning, Industry and Environment (DPIE).	Noted – the proposed condition is accepted.
HC8	3. The Applicant shall nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program according to the following conditions. This person must fulfil the Heritage Council's Excavation Director Criteria for the excavation of State (select) significant archaeological sites. The Heritage Council or it's Delegate must confirm that the nominated Excavation Director meets the Criteria.	Noted – the proposed condition is accepted.
HC9	4. A final archaeological excavation report shall be prepared within 12 months of the completion of archaeological excavation. It should include detailed findings of the project, including any significant artefacts recovered, where they are located and information about their ongoing conservation and protection in perpetuity by the land owner. The final report shall respond to the HARDEM and identify the final repository for the archaeological collection from the excavations. Copies of the final excavation report shall be provided to the Department of Planning, Industry and Environment (DPIE), the Heritage Council of NSW and to Parramatta Council's local studies unit.	Noted – the proposed condition is accepted.
HC10	Site preparation works (including demolition of structures, removal of vegetation and services) as part of the CHMP: The site contains archaeological potential. Prior to site preparation commencing (including demolition of structures, removal of vegetation, services location and site fencing) the project's Excavation Director must be involved to review and endorse the proposed strategy. This is required so that the works are conducted in a way that avoids impact on the potential archaeological resource ahead of its investigation under conditions of this consent. The final site preparation strategy shall form part of the site's Construction Heritage Management Plan (CHMP).	Noted – the proposed condition is accepted.

No.	Extract	Comment
HC11	Interpretation An Interpretation Plan, which further develops the Interpretation according to stages set out in the document titled 'Powerhouse Parramatta Response to Submission Report - Appendix G Heritage Interpretation Strategy Powerhouse Museum, Museum of Applied Arts and Sciences, dated September 2020' should be prepared for the project. The updated HIP relevant to each stage should be referred to the Heritage Council of NSW (or its Delegate) for review and comment, with the final version of each stage submitted to the DPIE for approval to address relevant project milestones. The Interpretation Plan must ensure that it appropriately responds to the archaeological results specific to this site and ensure relevant connections and context related to existing MAAS collections for broadest storytelling and interpretation.	Noted – the proposed condition is accepted.
HC12	Lennox Bridge We would also suggest that a suitably qualified heritage consultant shall establish protocols for the protection of the Lennox Bridge (SHR 00750) throughout the project to ensure it remains unaffected by the works.	Noted – the proposed condition is accepted.

1.5 Heritage NSW – Aboriginal Cultural Heritage Regulation

No.	Extract	Comment
AH1	HNSW recommends that the full Aboriginal consultation process be completed and the ACHAR updated to demonstrate that Aboriginal consultation was undertaken in accordance with the SEARs and the Consultation Requirements prior to project approval. This should include evidence of how the outcomes of consultation informed the development of cultural heritage management options and recommendations for the project.	As outlined in the Aboriginal Cultural Heritage Assessment Report at Appendix H of the EIS, consultation with Registered Aboriginal Parties is ongoing. The Applicant is completing the remaining stages of consultation in accordance with the amended design lodged with the Response to Submissions. The consultation process will be complete in January 2021.
AH2	HNSW recommends that a consent condition is created that requires an ACHMP be prepared for the project, in consultation with the RAPs.	Noted – the proposed condition is accepted.
AH3	HNSW recommends that the finalised long term care and control procedure for the management of any Aboriginal objects from the project area including any extant sites, be integrated into an ACHMP, to be prepared for the project (Recommendation 2). HNSW recommends that a long term management procedure be prepared for the project and integrated into the ACHMP.	Noted.

1.6 Endeavour Energy

No.	Extract	Comment
EE1	Endeavour Energy's Asset Planning & Performance Branch has reviewed the Infrastructure Services Strategy Planning and has advised that the information provided therein is in keeping with the input provided to supply arrangements under connection application ULL3028 to Endeavour Energy's Network Connections Branch for inclusion in the model standing offer and have no further comments or concerns regarding the electricity supply to the proposed development.	Noted.
EE2	Endeavour Energy's environmental business partner section has advised that the remediation of soils or surfaces impacted by various forms of electricity infrastructure is not uncommon but is usually not significant. The decommissioning and removal of the redundant electricity infrastructure will be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development.	Noted.
EE3	As previously advised 42 Philip Street was sold in July 2019 subject to an easement for electricity works over the whole of Lot 1 DP 128474 which may be released subject to the satisfaction of certain conditions.	Noted.
EE4	Subject to the foregoing Endeavour Energy has no objection to the State Significant Development Application.	Noted.

2.0 Neighbouring landowners

2.1 Australian Unity Office Fund

No. **Extract** Comment AU1 Despite widening of the Civic Link as a result of changes to PPM building The design of Civic Link adjacent to 32 Phillip Street includes landscape planting that can be envelopes, the PPM RTS seeks to provide continuous landscaping to the modified and/or removed in future should redevelopment of 32 Phillip Street be undertaken, western frontage of the Civic Link, surrounding the boundary of 32 Phillip Street. including works to the ground floor. The proposed development does not impede future access of the neighbouring building to the Civic Link. Aligned to the original submission, concern is raised of the capacity for this design approach to provide an integrated precinct whereby the PPM design The Applicant is committed to continued consultation with the owners of 32 Phillip Street as demonstrate the following principles: designs for foyer areas progress, including consultation in regard to how the Powerhouse • Pedestrian connectivity both within the site and broader Parramatta CBD. Parramatta may integrate with any of these designs. including adjoining sites; Activation of important frontages to the existing and proposed public domain, that will enable the success of vision for a pre-eminent Government site; - Public domain design outcomes that support the future redevelopment adjoining sites, and do not impede the potential for enhanced integration (e.g. outdoor dining opportunities); and • Appropriate ground levels that support the above principles, and required flood outcomes for the site and surrounds. To support Australian Unity's Response to the RTS, Fitzpatrick and Partners have prepared three landscaping options of existing and potential building and ground floor land uses (refer to Appendix A). Implementation of the above and proposed requests will assist in delivering the Government's vision for a preeminent site to active and integrate with the broader precinct. 1a) The PPM project team should be requested to refine the proposed landscape treatment for the Civic Link and meet with Australian Unity to discuss appropriate landscape treatment adjoining the boundary with 32 Phillip Street 1b) The landscape treatment on the western side of the Civic Link should allow for ground level use of the 32 Phillip Street site (existing and future) to include active uses that address and make the most positive contribution to activating the Civic Link. 1c) The landscape treatment of the Civic Link should be open to allow pedestrian movement and visual connections between buildings on both sides of the Civic Link. 1d) The landscape solution for the PPM should provide for outdoor dining opportunities including licenced areas along the western edge of the Civic Link fronting the 32 Phillip Street site

No.	Extract	Comment
AU2	Events and operational management will have a social, environmental and economic impact in terms of integrating with adjoining land uses, informing the design and management of the public domain as well as traffic and pedestrian connectivity is identified as critical. This aligns with the requirements of the SEARs, as issued by DPIE, particularly Item 4 (Integration with surrounding areas), Item 5 (Public Domain) and Item 11 (Transport, Traffic, Parking and Access). The absence of this information was raised within the PPM EIS was identified in Australian Unity's original submission.	A condition of consent in regard to the requirement to prepare a detailed Event and Operations Plan is anticipated. The Applicant will consult with the owners of 32 Phillip Street and other surrounding land owners and neighbours in development of this Plan.
	Requested Actions:	
	2(a) In the absence of an Operation and Event Management Plan prior to consent being granted, a condition should be imposed requiring submission of the Plan to the Department for approval, prior to the issue of any occupation certificate. The Operation and Event Management Plan, should include, but not limited to:	
	Summary of the development and operational details of trading hours and license(s)	
	Approach to provision of Operator Services	
	Methods of dealing with public authorities	
	Precinct Interface Management Plan (Operating Phase)	
	Traffic and Pedestrian Management Plan (Operating Phase)	
	Transport and Accessibility (Operations)	
	Security and Safety Plan (Operating Phase)	
	Event Management Plans (including designated locations, capacity, equipment, booking, notification of neighbours)	
	Public use of facilities	
	Complaints and Action Register	
	The Plan should demonstrate consultative engagement with relevant stakeholders, including adjoining landowners.	
	2(b) A condition of any consent should enable the Department an/or Council to request a copy of the complaints register at any time, requiring the landowner to amend the Operational and Event Management Plan based on feedback from the relevant authority.	
AU3	Following review of the RTS, Australian Unity remain concerned regarding the overland flooding considerations.	It is noted that the advice provided by Molino Stewart is not made in relation to the documentation provided with the Response to Submissions. The matters raised within this
	The existing 600mm diameter pipe which currently runs under Dirribarri Lane and the multideck carpark will be replaced by a 1200mm diameter pipe running under Dirribarri Lane and heading directly north to the river. On the eastern side	submission are adequately dealt with in Appendix J of the Response to Submissions Report.

No. Extract Comment

of the subject site a new 600mm pipe will be laid to take water directly to the river between the two museum buildings.

Molino Stewart have raised concerns with the flood modelling prepared by Arup at Appendix O of the EIS. In particular, concerns are raised in relation to whether adequate consideration has been given to the potential blockage of stormwater pits. Blockage in stormwater pits has the potential to change the reported flood modelling results.

It is noted that City of Parramatta Council requires an assumption of a 100% blockage factor for any flood modelling associated with development applications in the CBD. This assumed blockage percentage will have a significant bearing on whether the proposed development will increase or decrease flood levels at the subject site.

The existing stormwater flows pond in front of the subject site and flow in a 600mm diameter pipe under the Dirrabirri Lane to the river. When the flows to the low point exceed the capacity of the pipe the water rises until it reaches the high point in Dirrabirri Lane and the high point in Willow Grove and flows overland around the subject site.

If the inlet to the 600mm diameter pipe is partially blocked, less water will get into the pipe and more water will have to flow overland to the river in the same storm event. This means that any blockage in the pipe will increase the depth of the flows around the subject site and the depth of ponding in front of the building. A 100% blockage will mean all the flows go overland and maximise the flood depths at the subject site.

The overland flow management strategy for the PPM is to increase the capacity of the pipe in Dirrabirri Lane and to provide a new pipe to take overland flows along the eastern side of the subject site. This will effectively increase the flow rate underground and reduce the flow rate overland. Molino Stewart are concerned that if the inlets to the pipes are 100% blocked then they will make no contribution to flood conveyance and will not reduce flood levels at the subject site. As it is proposed to increase the ground levels to the east of the subject site and if Dirrabirri Lane is increased in level, then overland flow water will need to pond to a higher level in Phillip Street and increase the flood levels for the subject site.

Requested Actions:

- 3a) Australia Unity support the provision of amplified stormwater pipes on either side of 32 Phillip Street site.
- 3b) The flood impacts of the final PPM design should be tested using City of Parramatta Council's more up to date, and peer reviewed, flood model when it becomes available to ensure that there will be no adverse flood impacts on the subject site or the surrounding public domain.

No.	Extract	Comment
	3c) The PPM project team should be requested to provide updated flood modelling accounting for an appropriate blockage percentage for stormwater pits.3d) The civil design solution must not increase flood levels adjacent to 32 Phillip Street.	

3.0 Other organisations

3.1 Save The Powerhouse

No.	Extract	Comment
SP1	 New decisions on a project design described as "world class" should be publicised to a wide audience, not merely to local residents. A project which received over 1300 submissions of which 95% were opposed, should not be considered for approval. The modifications made to the design are purely cosmetic and do not change the fundamentals (a) The flood dangers on the site have not been addressed. Even if the undercroft is now closed, people could still drown when trying to escape land flood. (b) The proposed removal and rebuilding of Willow Grove on another site has been universally derided by experts as "farcical." (c) All other problems – size, lack of museum curatorial space, etc and immense costs - remain. 	The objections are noted. The submissions were identified and addressed in the report. The ground floor (finished floor levels) of the eastern and western buildings will comply with the flood planning level set by the Parramatta Development Control Plan and will be able to withstand riverine flooding and overland flooding events. The probability of overland flooding is very low and about 1 in 800 in any year. Expressed in terms of the design life of the building of 100 years, it represents a chance of 1 in 8 (i.e. 12%) of a flood occurring in this period which is within 0.3m of the ground floor level. The chance of ground floor inundation from the Parramatta River flooding is approximately 1 in 1000 in any year. An Emergency Evacuation Plan will be prepared for the site with consideration of Council's draft <i>Update of Parramatta Floodplain Risk Management Plans</i> consistent with other developments in the surrounding Parramatta CBD. Relocation of Willow Grove is proposed to be undertaken under the supervision of a heritage specialist and a process of recording and developing sensitive demolition methodologies would be undertaken prior to any works. Create Infrastructure NSW will develop a framework outlining the future site of Willow Grove, as well as the reconstruction process and the program that would be undertaken prior to the opening of Powerhouse Parramatta. Reference is made to the Response to Submissions Report dated October 2020 in relation to the matters raised during the public consultation process including museum size and curatorial spaces.

4.0 Public Submissions

A total of 18 submissions have been received from the public since lodgement of the Powerhouse Parramatta Response to Submissions. All 18 submissions object to the proposal. The table below summarises the key issues raised in the public submissions and provides the Applicant's response.

No.	Summary of Issue	Comment
PUB1	Willow Grove Relocation:	 The objections are noted. As outlined in the Response to Submissions The subject site is the most suitable location for the Powerhouse Parramatta as outlined in the EIS, including the site's iconic location within the CBD of Sydney's Central City, positioned on the Parramatta River foreshore at the terminus of the future Civic Link. The relocation of Willow Grove will be undertaken under the supervision of heritage specialists and in accordance with a detailed feasibility and heritage assessment that will determine the methodology for deconstruction and relocation. This will be completed prior to any deconstruction and relocation works.
PUB2	Car parking is insufficient.	In line with the project's commitment to sustainable travel no car parking will be provided on the site. Powerhouse Parramatta is located in proximity to existing train, bus and ferry transport nodes and will further benefit from transport connectivity through the Light Rail and West Metro projects.
PUB3	Archaeological surveys are required.	Archaeological surveys will be completed prior to any works for the construction of the museum. As the site contains existing buildings and hard stand, these structures are required to be removed prior to any archaeological investigations.
PUB4	Alternative sites for the project should be considered.	Refer to Response to Submissions.
PUB5	Objections to the proposed land uses and design.	Refer to Response to Submissions.
PUB6	The site would be impacted by flooding.	Refer to Response to Submissions.