

Infrastructure NSW

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PARRAMATTA NSW 2150

17/03/2025

Dear David

Powerhouse Ultimo Revitalisation- SSD 67588459

In response to the submission received 13 March 2025 from Kylie Winkworth on behalf of the Powerhouse Museum Alliance, please find enclosed a response from the Applicant.

Attached to this letter is a detailed response to items raised in the letter from Ms Winkworth to Ms Yuan of the Department of Planning, Housing and Infrastructure (undated) (**Letter**). In respect of the other attachments included with this submission, the Applicant provides the following responses (adopting the titles of those documents):

Winkworth What does saving the Wran Building Mean, March 2025

Applicant Response- this paper contains statements that are included within the Letter as well as criticism of Government decisions in relation to Powerhouse Ultimo. The Applicant refers to the attached response to the Letter.

The Applicant also refers to Appendix P – Amended Visual Impact to the Response to Submissions which sets out in detail the visual impact analysis for the Powerhouse Ultimo Revitalisation project. Furthermore, the Applicant refers to Appendix L – Amended Heritage Impact Statement which sets out in detail matters raised in the submission including the reorientation of the museum's entry from Harris Street to the Boiler House and Goods Line, the impacts of the proposed works on the State heritage listed Ultimo Post Office and how the distinctive arched roof form and general scale of the Wran Building is proposed to be maintained and enhanced through maintaining the arched roof form over Vault 1 and providing an interpretation of the arched roof form over Vault 2. Appendix H of the Amended Heritage Impact Statement contains current photographs of the Powerhouse Museum Complex taken by Curio Projects at the time of preparation of the Amended Heritage Impact Statement.

Winkworth: Joining the Dots: the Powerhouse Museum's demolition and secret conversion to a creative industries, theatre, and performance centre

Applicant Response- this paper purports the view that Powerhouse Ultimo Revitalisation will not be a museum and instead become a performing arts venue. These claims are addressed in the attached detailed response.

The Powerhouse Museum's Wasteful Demolition and Redevelopment: Cost and Planning Comparisons with UK Museum Renewal Projects

Applicant Response- this paper contains examples of museum projects within the United Kingdom and suggests processes, planning and funding of these projects should be adapted for the Powerhouse Ultimo Revitalisation. The parallels sought to be drawn between the needs and intent of Powerhouse Ultimo and the examples cited are not accepted by the Applicant and it is maintained that the planning for the Powerhouse Ultimo Revitalisation has been undertaken in accordance with the legislative framework that applies to the Australian and NSW context. In respect of the specific claims made in relation to the Powerhouse Ultimo Revitalisation project, the Applicant refers to the attached detailed response.

If you have any questions regarding this letter, please contact me on 0421 595 766.

Yours sincerely



Tom Kennedy

Planning Manager

Infrastructure NSW

Detailed Response to Winkworth Submission, 13 March 2025 (Response)

No	Comment	Response
1.1	In more than forty years' experience in museum development I have never seen a museum project designed and funded without any public information whatsoever on the museum's purpose, concept, themes, facilities, exhibitions and cultural and economic impacts. The EIS and the HIS treats the Powerhouse Museum as an empty box. An empty box is not a museum. As explained in the Winkworth PMA objection, the EIS and plans for Powerhouse Ultimo cannot be fully understood or critiqued because there is no information or credible explanation between the works in the plans and reports in the EIS, and the purpose, concept, facilities or functions of what is left of the Powerhouse Museum. The public is left in the dark by the lies, obfuscations and refusal of the proponents to release the design briefs and the facilities briefs, and the absence of any information on the concept and purpose of the Powerhouse Ultimo facility, no longer even called a museum. This secrecy is unwarranted and unjustified. There is no credible, evidence-based justification in the EIS for the scale of the PHM's demolition, the wastage of fit for purpose museum infrastructure, and the scope of works embedded but not explained in the EIS.	These matters were addressed in Appendix C to the Supplementary Response to submissions at: - OP-2 in respect of museum programming These matters were addressed in Appendix D to the Response to Submissions at: - OP-53 in respect of release of briefs. In addition to the EIS, see also the following documents in respect of the proposed works, consideration of alternatives and justification for the proposed works: - Appendix L to the Response to Submissions – Amended Heritage Impact Statement - Appendix C to the Supplementary Response to Submissions – Annexure B Option 3 Refurbish Existing
1.2	The reports and plans in the EIS are a cover to obscure the secretive re-purposing of the Powerhouse Museum as a performing arts centre, see below and the attached Joining the Dots paper. There is no evidence in the EIS, and the thousands of pages of associated reports and plans, that demonstrates the need for the Powerhouse Museum to be substantially demolished, downsized, gutted and reconfigured into a performance centre, including the demolition of all trace of the 1988 Powerhouse Museum, the demolition of all the renewal works completed just 12 years ago, and the demolition of 75% of the PHM flexible exhibition galleries.	The use of the proposed development is outlined in the EIS at: - Section 3.1- in respect of the uses for which development is sought. - Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum. There is no proposed change to the use of the museum. Rather, development consent is sought for use of new built form for the purposes of the museum use.
1.3	This leaves the conclusion that the Powerhouse Ultimo SSDA is not a museum. The request for SEARS is for an <i>information and education facility – museum</i>. But the EIS does not provide any information, reports or plans that relate to the museum's functions, use, purpose, concept and exhibition plans, nor any information that justifies the wasteful and radical demolition and	Section 4 of the EIS outlines that the project for which development consent is sought is an 'information and education facility,' for use as a museum. As above in 1.2 of this Response, development consent is sought

	downsizing of the Powerhouse Museum. The EIS fails to document let alone address the scale, necessity and impact of the demolition works on the capacity of the museum to fulfil its legislated purpose. Reference to the Parramatta and Castle Hill developments in the RtS are meaningless. The plans propose a set of three cavernous ‘presentation spaces’ in the gutted shells of the Boiler Hall and Turbine Hall, and the rebuilt shell of the former Wran building, but the EIS fails to explain the museum purpose, function, or uses of these spaces, or why they are needed. The project cannot be understood or assessed without this information. The public needs to see the museum concept and exhibition plan to understand the justification for the proposed works, along with the design and facility briefs for the architectural competition and detailed design work.	for the proposed works and the use of new built form for the purposes of a museum. The extent of proposed demolition is also addressed in 1.1 above of this Response. These matters were addressed in Appendix C to the Supplementary Response to submissions at: • OP-2 in respect of museum programming. • OP-10 in terms of programming and the MAAS Act. • OP-101 in respect of the MAAS Act.
1.4	In responding to criticism of the scale of demolition of 75% of museum’s exhibition space and 25 exhibition galleries, the RtS makes a series of misleading and false statements, without foundation or any supporting evidence based on the reports in the EIS. <i>A quantitative comparison between the existing areas of the museum and the proposed areas does not pay sufficient regard to qualitative considerations of the spaces in terms of clarity of circulation and the ability of spaces to offer contained exhibitions. Flexible, international standard exhibition spaces that can support and adapt to new and dynamic programs that facilitate direct connections with Powerhouse collections are essential for the museum’s future. • The reconfiguration of the Boiler Hall, Turbine Hall, Wran Building, Switch House and the creation of new spaces will provide a diversity of exhibition space typologies with the capacity and flexibility to enable the museum to create and present high quality, internationally leading museum exhibitions across the applied arts and applied sciences.¹</i> This is word soup nonsense. What are the new and dynamic programs referenced here? There is no evidence in the EIS to support these assertions. There is no diversity of exhibition space typologies in the plans on exhibition. This is false. The demolition works entailed in the SSDA drastically reduce the capacity of the museum to create and present high quality, internationally leading museum exhibitions across the applied arts and applied sciences, because it leaves the former PHM with only three large, cavernous spaces. This is a false a statement not supported by any evidence or report in the EIS or information released by the proponents.	These matters were addressed in Appendix D to the Response to Submissions at: • OP-1 in respect of museum programming. • OP-61 in respect of the accuracy of the EIS • OP-96 in respect of the proposed exhibition spaces.
1.5	1.5 In fact the SSDA Powerhouse Ultimo plans provide no <i>qualitative improvement in the ability of the museum to offer contained exhibition spaces</i>. This is another false statement. The Powerhouse Museum always had <i>contained exhibition spaces</i>. These include two levels of exhibition galleries in the Switch House set for demolition, the temporary exhibition gallery in the	These matters were addressed in Appendix D to the Response to Submissions at: • OP-1 in respect of the range of spaces to be provided.

	Wran building which will be substantially demolished despite promises the Wran building would be saved, and the mezzanine gallery on level five of the Wran building used for many international exhibitions, also set for demolition. In fact it is the Real Powerhouse Museum that was designed with a typology of 25 flexible exhibition spaces for different collections, types of exhibitions and audiences. The PHM's exhibition spaces flowed and had thematic coherence, as noted in the Sulman award citation, with the Switch House galleries for applied arts, design and international exhibitions, the Turbine Hall galleries used for social history and Australian communities, the bottom floors of the Turbine Hall for <i>Steam Revolution</i>, science, interactives and family exhibitions, and the Boiler Hall and its mezzanine galleries for transport, flight and space and environment.	• OP-4 in respect of steam displays. • OP-10 in respect of retention of heritage and the status of the 1988 works.
1.6	1.6 The three cavernous 'presentation spaces' created from the PHM's demolition are obviously designed for performance not museum exhibitions. They are demonstrably less flexible and unsuited for the scope of the PHM's collections of applied arts, design, science, technology, and history. More than 97% of the PHM's collection are small to medium sized objects. The presentation spaces are in every way inferior to the exhibition galleries in the real Powerhouse Museum. Exhibiting the museum's collections in the cavernous spaces left from the demolition of the Powerhouse Museum's exhibition galleries will entail high exhibition fit out costs, longer lead times, and higher recurrent costs for NSW taxpayers, assuming there is any intent to use the spaces for museum exhibitions. This is because every exhibition will need an expensive series of constructed rooms, walls and panels to structure the exhibition narrative, contain and display collections, and mediate the scale of the objects on display within the cavernous spaces. Museum architects and designers understand this point. The proponent of this destructive project do not. They have learnt nothing from the design mistakes already baked into the Parramatta Powerhouse presentation spaces, also designed for performance and venue hire. The project is way over budget and years behind schedule. It was supposed to open in 2023 and be fully funded within the \$915m. It is at least \$300 million over budget already, but the proponents are seeking more taxpayers' money for the fitout and exhibitions that should have been funded within the \$915m. No wonder the proponents are hiding the design briefs from public scrutiny.	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought. • Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum. Matters in relation to expenditure were addressed in the Response to Submissions, Appendix D, item OP-58.
1.7	1.7 The RtS attempts to justify the wastage of museum infrastructure and the demolition and downsizing of the PHM's exhibition capacity by reference to <i>the wider Powerhouse program that includes the recent expansion of Powerhouse Castle Hill) the establishment of Powerhouse Parramatta (under construction) – together these facilities represent a significant expansion of the Powerhouse's museum spaces and overall capacity to deliver programming</i> 2 This is a stunning admission; the Powerhouse Museum is being downsized, gutted, degraded and substantially demolished because of Castle Hill and Parramatta! This is contrary to the	These matters are addressed in the Response to Submissions, Appendix D, items: • OP-6 in respect of museum programming and collections display. • OP-51 in respect of the Government's approach to the Powerhouse Revitalisation.

	government's public promises on the future of the Powerhouse Museum as a flagship museum, and it shows the deception at the heart of the SSDA plans. <i>We want a museum of the highest excellence at the Ultimo site which has a clear and distinct identity and which builds on its traditional focus on science, engineering, transport, the technical arts and education.</i>³ This was the Minn's government's promise for the Powerhouse Museum. Why is this project delivering the exact opposite at a cost of more than \$400m to taxpayers?	
1.8	1.8 There is no comparison between the PHM as a renowned tourism attraction within easy walking distance of Central Station and Haymarket, and the inaccessible J Store at Castle Hill where visitors can expect to see planes on crates with their wings off. Every global city maintains their state museums in the city centre where they are accessible to the maximum numbers of visitors and tourists. As the PMA has demonstrated, Powerhouse Parramatta not a museum; it is designed as an arts and entertainment centre, with every space designed for performance and venue hire, not museum exhibitions. It appears the Powerhouse Museum is being demolished and downsized as a sub-branch of the bloated Parramatta entertainment and convention centre. If this is the rationale for downsizing and demolishing all trace of the 1988 Powerhouse Museum and the wastage is high quality infrastructure, it should be in the project objectives and the proponents should be honest about this.	These matters are addressed in the Response to Submissions, Appendix D, items: • OP-42 in respect of the 1988 reconfiguration as a museum • OP-48 in respect of tourism. • OP-119 in respect of museum programming.
1.9	The RtS tables have failed to address numerous critical points raised in multiple submissions including my own submitted for the PMA concerning: • The unjustified scale of asset destruction of high-quality fit for purpose museum exhibition spaces and infrastructure • The unwarranted secrecy around the plans for the former PHM and the failure of the proponents to honour the government's repeated commitments of transparency, see below and part 2 in the Winkworth PMA objection to the EIS. There is no case for secrecy on the design and facility briefs, unless the proponents are hiding the real intent of the Powerhouse Ultimo works. The Department of Planning needs to insist on the public release of these documents. • As noted the three presentation spaces left in the former PHM are demonstrably unsuitable for most of the museum's collections. They are obviously designed for performance, not museum exhibitions, see below and the attached <i>Joining the Dots</i> paper. There are no museums designed on the principles evident in the gutting and demolition of the PHM to create 'large volume presentation spaces' for no possible museum or exhibition use. • Contrary to assertions in the EIS and RtS, the Powerhouse Museum has long had a program of successful international exhibitions, that is until the current management's change of focus to funding contemporary artists and performers. Submissions to the EIS	These matters are addressed in the Response to Submissions, Appendix D, items: • OP-1 in respect of the proposal's suitability to operate as a museum • OP-10 in respect of impacts to the heritage and cultural value of the museum • OP-11 in respect of constraints of the current form in relation to circulation • OP-12 in respect of spaces/ requirements for international exhibitions • OP-17 in respect of the Heritage Impact Statement. • OP-51 in respect of distrust of Government approach to Powerhouse Revitalisation • OP-58 in respect of expenditure. See also: • 1.1 and 1.6 above of this Response;

	have comprehensively rebutted the claim the Powerhouse Ultimo works are needed for the museum show international exhibitions. It is demonstrably false for the EIS and RtS to claim the proposed scale of demolition works are necessary to allow the museum to show international exhibitions. The failure to secure international exhibitions has been a deliberate choice by the current management. • Contrary to false assertions in the EIS and HIS, the Wran building was designed for exhibitions and has been an exhibition space from museum's opening in 1988. These errors have not been corrected in the EIS, the HIS nor addressed in the RtS. See also the attached paper What does 'saving' the Wran building mean? • Claims about problems with the circulation paths in the PHM are nonsense and cannot justify the radical and wasteful demolition of most of the Powerhouse Museum. There is no evidence in the EIS to explain this. Almost all great museums here and overseas are designed with exhibition galleries that are 'enfilade'. This includes MONA in Hobart which opened in 2011. It is ridiculous and false to claim 'clarity of circulation' justifies the extensive demolition and repurposing of the PHM, or that the remaining three cavernous spaces are an improvement of the PHM's 25 flexible exhibition spaces. This point was made in the PMA's submission but was not addressed in the RtS. Visitors don't go to museums to enjoy the circulation spaces; they go to see and enjoy exhibitions. • The fact is, if the wasteful demolition plans are approved, and there is 75% less exhibition space, the public will see less of the PHM's collection and enjoy fewer exhibitions with lower education, tourism and economic impacts. These impacts have not been addressed in the EIS as required by the Department's Guidelines for SSD EIS. • The EIS does not explain or demonstrate the museum need for additional opportunities for large volume presentation spaces, especially in the context of the Parramatta development with its over-scaled presentation/ performance spaces. The EIS does not substantiate or explain the case for these changes, and the RtS does not deal with this objection. What is it the proponents want to do in Powerhouse Ultimo can't be done at Parramatta or in the real PHM? Presumably there is a report explaining these claims and what the proponents want to show in Powerhouse Ultimo that can't be done in the PHM. This should be in the EIS. • The EIS does not properly represent, document, explain or justify the scale of the Powerhouse Museum's demolition, and the wastage of high quality museum infrastructure, including extensive visitor facilities completed only 12 years ago. A set of floor plans with some red outlines does not detail the scale of demolition or explain why the PHM's facilities and assets are being wasted for no public benefit, or heritage or museological purpose. The information on the demolition and interventions to heritage fabric required in DPHI 3 and 4 of the RtS has significant gaps and omissions.⁴	• sections 7.3, 7.4, 7.5, Appendix D and Appendix H of Appendix L to the Response to Submissions - Amended Heritage Impact Statement. • as set out in section 3.2 of the EIS, the proposed works involve a reorientation of the museum entrance from the Wran Building to the Boiler House and Goods Line.
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	Understanding of the scale of the demolition and intervention is hampered by the absence of cross sections in the plans.	
1.10	1.10 In response to criticism about the unjustified wastage of museum facilities, the RtS claims <i>The EIS and the Response to Submissions sets out in detail how the proposed development will result in a better museum particularly in terms of removal of current operational constraints, large and flexible exhibition spaces, improved heritage outcomes as set out in the Amended HIS and improved landscaped public domain and reactivation of Harris Street, Macarthur Street and the Goods Line.</i>⁵ These statements are false and are not supported by any evidence in the EIS. What are the operational constraints? This should be explained in the EIS, consistent with the signed declaration by Ethos Urban, required by the Department's State Significant Development Guidelines. The demolition and erasure of all trace of the Sulman award winning Powerhouse Museum including the Wran building is demonstrably not an 'improved heritage outcome'. The weight of authoritative public submissions by museum and heritage experts and eminent conservation architects conclusively establish that the demolition works have a negative impact on the museum's heritage values and exhibition capacity, are inconsistent with Burra Charter heritage principles and practice, and with the government's explicit promises about saving the Wran building and a heritage revitalisation of the Powerhouse Museum. ⁶ Furthermore, there is no information in the EIS or RtS that explains how this destructive project will create a better museum because there is a total absence of any information about the proposed museum exhibitions and programs. There is no credible need or purpose in turning the Galleria into a passageway, when it should be retained as the setting for the Boulton and Watt and No.1 Locomotive, tender and carriages, as originally designed. This is a wasteful and destructive demolition for no public purpose or museological benefit.	The rationale for undertaking the project is outlined in the EIS in respect of the Objectives of the proposed development (section 1.3), Analysis of alternatives (section 2.6), design principles (section 3.2) and Project justification (section 7). This is supported by additional material lodged with the Response to Submissions and Supplementary Response to Submissions. The Burra Charter has been addressed within the Amended Heritage Impact Statement at Appendix L to the Response to Submissions. See also 1.1 above of this Response.
1.11	The mostly sunless public domain that replaces the Harris St forecourt represents a significant reduction in public amenity. The public domain in the EIS plans is substantially smaller and has poor solar access compared with what the Powerhouse Museum offered its visitors before the current management closed the entry from the Goods Line and access to the eastern courtyard. Visual images of this space are deceptive. They show the eastern courtyard bathed in a golden glow, which does not reflect the actual shadow regime that leaves the space deprived of sun for most of the year. The public domain proposed in the EIS is demonstrably not a significant improvement in either the size or quality of public space, as claimed in the EIS. I note the HIS failed to assess the significance of the Harris St forecourt although it is an integral part of the PHM's design conception and the arrival experience, serving the same function as the Utzon forecourt at the Sydney Opera House.⁷ Connectivity issues between the PHM and Haymarket	The quantum of open space areas within the proposed development is outlined within section 3.6 of the EIS and Appendix F to the EIS. Overshadowing diagrams are included at Appendix E to the Response to Submissions and demonstrate that sunlight is provided to the proposed Gathering Terrace in summer, autumn, winter and spring. See also section 6.2.2 of the EIS. The Amended Heritage Impact Statement at Appendix L to the Response to Submissions assesses the

	and Darling Harbour have not been addressed in the EIS due the absence of a master plan for the precinct.	impact of all works proposed, including to the existing Harris Street forecourt.
1.12	Far from activating Harris St, the Powerhouse Ultimo plans hide the museum behind brick walls and a row of shops. See visual references in the attached paper, Winkworth, What does saving the Wran building mean? The design leaves the Powerhouse Museum without a presence on Harris St where it has been a cultural landmark since 1893. There are no great museums without a street address. What's left of the Powerhouse Museum will have no public visibility or profile, compared to the PHM's original distinctive landmark design. There is no arrival experience in the EIS plans for Powerhouse Ultimo, no obvious entry for people approaching the museum from Haymarket, and no shelter for the numbers the proponents claim the development will attract. The EIS does not have visitor arrival stats to justify hiding the museum and reducing its landmark presence on Harris Street. The PHM's visibility to low numbers of foot traffic on the Goods Line is negligible compared to the Powerhouse Museum's prominent entry on the highest point of the spine of Harris St, seen by thousands of vehicles every day. It is another sign the proponents have not understood the basics of museum architecture. (Supposing the development is a museum which is doubtful.)	Appendices E, F and M to the Response to Submissions outline how the proposed built form fronting Harris Street would provide a suitable identity for Powerhouse Ultimo when viewed from this vantage point. See also section 3.5 of the EIS. As referred to at 1.9 above of this Response, the proposed works include a proposed reorientation of the museum entry to the Boiler House and Goods Line.
1.13	While noting the planned Metro station for Pyrmont, the plans assume that Harris Street will be unchanged in its traffic patterns. The EIS hasn't considered how the electrification of cars and trucks over the coming decades will improve the amenity of the museum's Harris Street forecourt. Nor does it consider how the densification of Pyrmont Ultimo will require more buses and connectivity via Harris Street. Inexplicably the SSDA plans deliver a narrower footpath on Harris St, mostly without an awning, when the Pyrmont Peninsula Strategy calls for the widening of the footpaths on Harris St. The retention of the coach set down on Harris St will deliver schools and visitors to a building that has a narrow, constrained entry slot and no shelter. In every sense the plans are inferior to the generous welcome space, amenity, circulation and movement of visitors arriving at the Powerhouse Museum. There are stairs at all the major entry points in the EIS plans. Access for families, the elderly and disabled is far inferior to the organised flow of visitors into and around the museum which was noted in the Sulman citation. These issues and opportunities should have been addressed and recognised in the EIS and RtS. Many of these issues should have been addressed in a masterplan for the PHM Complex. As a start the proponents should release the masterplan completed in 2020-21.	The Transport Impact Assessment at Appendix H to the EIS and the amended Transport Statement at Appendix O to the Response to Submissions detail the current and future connectivity and servicing for the site. See also section 3.8 of the EIS. The EIS at section 2.3 outlines how the proposal is consistent with relevant strategic planning documents.
2.1	The EIS includes a signed declaration that the EIS contains all available information relevant to the environmental assessment of the development, it does not contain information that is false or misleading, it addresses the SEARS requirements, it addresses the relevant statutory requirements has been prepared according to the Department's State Significant Development Guidelines, contains an accurate summary of the findings of the community engagement, and	The allegation regarding the declaration being false is not substantiated.

	contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole. In particular the signed declaration states the EIS contains <i>all available information relevant to the environmental assessment of the development, activity, or infrastructure to which the EIS relates...</i> Ethos Urban signed this required declaration as to the completeness, accuracy, quality, and clarity of information in the EIS. In many respects this declaration is false.	
2.2	The Powerhouse Ultimo Revitalisation EIS is incomplete, lacks critical detail on the activities and infrastructure, the intent and impacts of the project, makes tendentious arguments without evidence, and contains false and misleading information. The EIS is supposed to provide the community with the information they need to understand the project and its impacts, so we can make informed submissions. The declaration attests that <i>the EIS contains all available information relevant to the environmental assessment of the development...</i> _This is not true. Critical information as to the purpose, functions, facilities, activities, economic impacts and design intent of the project has been withheld from public scrutiny.	The EIS has assessed all relevant information in accordance with the Secretary's Environmental Assessment Requirements and the applicable legislation, including having regard to the Department of Planning, Housing and Infrastructure's State Significant Development Guidelines. In respect of the assessment of the proposed exhibitions, this matter is addressed at Appendix C to the Supplementary Response to Submissions at OP-2:
2.3	There is no museum plan, no concept or exhibition plan, no design briefs, no facilities brief, no master plan, and no business case summary to explain or justify the wasteful demolition and degradation of a Sulman award winning museum that is only 36 years old. These museum and planning documents are commonly in the public domain for every comparable museum renewal and development project in Australia or overseas. The proponents are seeking approval to demolish the Powerhouse Museum the government promised to save, without any information whatsoever to explain the alleged museum need for large volume presentation spaces. The project proponents, the EIS consultants and the architects have these reports, including the design and facility briefs, a master plan, a business case and the Event Scenario briefs that form the basis for the project requirements and consequent plans. ⁹ Information in these reports is cited as evidence in the EIS and RtS for claimed problems with the PHM which require the extensive demolition of all the exhibition galleries, all the mezzanines, all the education and visitor facilities including the ramps, escalators and lifts, three theatres and all the education and working spaces. None of this critical information is in the EIS or on the INSW and MAAS websites, to explain what the project is about, or to justify the wastage, degradation and demolition of high quality fit for purpose museum infrastructure, including the demolition of all the museum renewal works completed just 12 years ago. See attached paper on UK cost comparisons for genuine museum renewal projects, which also summarises the extent of the	This matter is dealt with at Appendix D to the Response to Submissions, item OP-64. Whilst not a town planning matter, there are different economic, market and supply chain factors that affect the cost of construction in the UK compared with Australia. See also Appendix F – Amended Design Report to the Response to Submissions and Appendix L – Amended Heritage Impact Statement regarding deterioration of the metal and glazed external fabric of the Wran Building in contrast to the robustness of the brick facades of the Heritage Core buildings.

	demolition of fit for purpose museum facilities. The contrast with the refined and collaborative approach of UK museum renewal projects is stark. None of these museum renewal projects, for buildings are that are much older than the PHM, were premised on the extensive demolition and erasure of the fabric of the museum.	
2.4	Secrecy, stonewalling and deception has been used to hide crucial information about the Powerhouse Ultimo project. The PMA repeatedly requested copies of the design briefs, the master plan and related documents for Powerhouse Ultimo. In 2023 my GIPA to MAAS for these documents was refused. When the Hon Robert Borsak asked for these documents in Questions on Notice, the Arts Minister advised there were no documents with these titles. This was not true. The documents had already been identified by MAAS in the response to my GIPA.¹⁰ Elsewhere the Minister claimed we'd asked for documents that did not exist. When I criticised the secrecy and absence of the design briefs for the Powerhouse Ultimo development in a radio interview in December, the Powerhouse Media Unit emailed 2GB claiming I made incorrect allegations and false claims. This was not true. Every I statement made was verifiable. Powerhouse Media claimed in their email to 2GB that <i>the Design Brief for the Powerhouse Museum, Ultimo 2022 National Design Competition was made publicly available as part of answers to supplementary questions from Budget Estimates Hearing Date: 6 September 2024. This information can be accessed via the NSW Parliament here:</i> Supplementary Questions Budget Estimates Hearing Date : 6 September This was deceptive as Powerhouse knew. The link to the design brief on p.69 has just 18 pages of the September 2022 Design Competition Brief, from a document that is likely 150 pages. All the significant pages on the facilities requirements, heritage adaptation, program uses, presentation spaces is missing. This is typical of the trail of deception and lies to hide the real intent behind the demolition of the Powerhouse Museum.	This matter was addressed in Appendix D to the Response to Submissions at item OP-53.
2.5	The EIS fails to include the MAAS Act in the section on the statutory requirements. The RtS dismisses objections about the development being inconsistent with the MAAS Act as merely a land use matter.¹¹ This is false. The statutory context required for SSD projects, and by SEARS, is not limited to land use or planning instruments but includes <i>other relevant legislation</i>.¹² It requires the EIS to address all relevant legislation. The proponents must demonstrate the project is consistent with the MAAS Act and that the plans provide the installations and facilities for the museum to fulfil the objects of its governing legislation. The demolition of significant installations such as <i>Steam Revolution</i> in the historic Engine House, <i>Transport, Flight and Space</i> in the Boiler Hall, the Boulton and Watt and No.1 Locomotive installation in the Galleria, and the 75% reduction in exhibition space clearly degrades the museum's capacity to fulfil the objects of the MAAS Act.	These matters were addressed in Appendix D to the Response to Submissions at OP-115 in respect of the MAAS Act being a requirement for the EIS.

2.6	The EIS and RtS does not explain why the PHM is being converted to a creative industries facility nor does it show how this is consistent with the MAAS Act. This is not a programming issue as claimed in the RtS, OP-119. It is central to the project's planning, design and the museum's downsizing and demolition. Not least the development of shops for creative residents on Harris St. Under its legislation MAAS has no responsibility for creative industries which are not the same as applied arts. The MAAS Act must be addressed in the section on statutory requirements as required by SEARS, and the EIS must show the development is consistent with the MAAS Act in providing <i>museum exhibition spaces</i>, not performance spaces or creative industry facilities. The plans in the EIS do not provide an accurate GFA schedule for the amount of creative industry space, though I earlier requested this information.	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought. • Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum. The plans outlining the GFA for the proposal at Appendix E to the Response to Submissions represent an accurate calculation of the floor spaces in accordance with <i>Sydney Local Environmental Plan 2012</i>.
2.7	There is no strategic justification for the conversion of the Powerhouse Museum into a creative industries precinct. As noted in the PMA's objection, part 4, there are other galleries, facilities and precincts in Sydney that have a remit for creative industries and contemporary arts. This point is not addressed in the RtS. Recent developments also propose that White Bay Power Station, the National Art School, and the Moore Park Entertainment Quarter will be hubs for creative industries and live performance. Sydney's real cultural deficit is in museums. Committee for Sydney research shows Sydney is in bottom 20% of 48 global peer cities for the number of museums.¹³ It is an act of cultural and economic self-harm to reduce the size, functionality and exhibition capacity of the Powerhouse Museum, demolish 75% of its exhibition spaces and replace museum facilities with spaces for creative industries and live performance, spaces which are already well supplied in Sydney.	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought. • Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum.
2.8	The EIS has not done any research on economic or tourism research on visitor demand or interest in museums, relative to artist studios or performance spaces. Visiting history, heritage buildings and museums are the top interests of high value international cultural tourists at 67% and 56% respectively. The sector was worth \$14.3 billion in the year before Covid. Only 9% of international cultural tourists and 3% of domestic visitors are interested in visiting artist studios and workshops. Just 17% are interested in attending performance, theatre and concerts. Sydney is relatively well supplied for performance and theatre venues compared to museums.¹⁴ Genuine heritage conservation and renewal of the Powerhouse Museum has a better chance of enlivening Harris Street than creative industry shops, and would have greater education and economic impacts in terms of cultural tourism than the proposed downsized performance centre and creative industry facility.¹⁵	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought. • Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum.

	The strategic context in the EIS is clearly based on the 2018 business case and the former government's secretive \$500 million proposal in 2021 for creative industry, fashion, design and theatre facilities on the former Powerhouse Museum site. Notably the project was focussed on turning the former Powerhouse Museum into a 24 hour entertainment precinct to support the casino economy of Pyrmont and Barangaroo. The Powerhouse is on the board of the New Sydney Waterfront Co. an organisation focussed on developing the 24 hour night time economy, linked to the casino. With the Star on the brink of administration, and the business model of the casinos ruined after they were exposed for rampant money laundering, the drivers of the Powerhouse Museum's conversion to a performance centre and nighttime entertainment zone no longer exist. If approved the Powerhouse Ultimo demolition and downsizing scheme in the EIS will jeopardise the precinct's mainstay family tourism and education markets, recklessly abandoned by the current management of MAAS, and so successively developed by the Australian Museum. In 2023-24 the Australian Museum reported 1.5 million onsite visitors, a 63% increase over the previous year. In the Powerhouse Museum's last full year of operation in 2022-23 it had 583,757 visitors to the PHM, including party goers. Delivering far less with more money, MAAS had a 56% decline in education participation between FY 2019 and 2023 despite a 92% increase in recurrent funding.¹⁶ Benchmarked with comparable state and national museum, the poor performance at MAAS over five years, relative to its higher levels of funding, has nothing to do with the museum's infrastructure. It's about leadership, competence and the validity of the CEO's dubious 'new paradigm' for museums. The Powerhouse Ultimo plans demolish 75% of the museum's extensive fit for purpose education spaces, including all the spaces built just 12 years ago. This must diminish the museum's education impact and the numbers of students and teachers on site.	
2.9	The objectives and strategic context in the EIS should have included reference to the key commitments made by the government for the Powerhouse Museum, including the heritage revitalisation of the Powerhouse Museum, saving the Wran building, preserving the Wran legacy and keeping the Powerhouse Museum open.¹⁷ Instead, as noted, the proponents are still wedded the creative industries and performance cum theatre concept secretly advanced in 2020, based on the 2018 Ultimo Presence business case.¹⁸	The Objectives of the Development at section 1.4 and the Strategic Context at Section 2 of the EIS are consistent with the requirements of the <i>Environmental Planning and Assessment Act 1979</i>, the SEARs and the State Significant Development Guidelines.
2.10	The EIS does not give effect to the government's public policy commitments for the Powerhouse Museum (PHM). It is corrosive of public confidence in government and public administration when specific commitments on the Powerhouse Museum are made in public and in writing, while the public service does the opposite. The project objectives in the EIS do not even mention the heritage revitalisation of the PHM. The objectives make no mention of conserving, saving or restoring the Wran building, or preserving the Wran legacy. In fact the plans in the EIS deliver the exact opposite. Not one part of the Powerhouse Museum's design, interiors, fabric, fittings,	See 2.9 above of this Response regarding the Objectives of the Development and the Strategic Context. See also 1.1 and 2.3 above regarding the extent of proposed demolition.

	visitor facilities, amenities, theatres, exhibition galleries, significant exhibitions, or education spaces survives the wrecking ball. In addition to the demolition and erasure of all trace of the PHM's Sulman award winning heritage adaptation and contemporary design, the plans also destroy the museum's concept, architecture and identity as a major cultural landmark on Harris St. Incredibly all this waste and asset destruction of a museum that is only 36 years old, is overlooked in the assessment of environmental, social and economic impacts, and Ecologically Sustainable Development (ESD). 19 Adding hot sauce to this hypocrisy, Powerhouse repeatedly claims to be a leader in climate action and sustainability while it demolishes the Powerhouse Museum that only needed maintenance, repair, conservation restoration and renewal of its exhibitions. None of this required the pre-emptive closure of the Powerhouse Museum in February 2024, years before Parramatta is open.	Matters in relation to distrust of Government approach to Powerhouse Revitalisation is addressed at Appendix D to the Response to submissions item OP-51.
3.1	The NSW Heritage Council and its committees were briefed on the Powerhouse Ultimo plans on eight occasions over the last two years. In October 2023, a month after the government's announced heritage revitalisation of the PHM, and explicit promises they were saving the Wran building, the Heritage Council was briefed on <i>the proposed adaptative reuse of the Ultimo Power House</i> with the proponent highlighting the <i>operational constraints and challenges and future requirements for contemporary museum practice</i>. <i>Adaptative reuse</i> to what? This should have been detailed during the nine rounds of consultations since September 2020, and in the SSDA EIS. What are the <i>future requirements for contemporary museum practice</i>? This information should be in the EIS. It's clearly part of any justification for the radical changes proposed for the former PHM. A museum is not an empty box. The EIS should explain what the adaptative reuse of the Powerhouse Museum is for. INSW and MAAS have numerous reports on the rationale and claimed need to <i>create additional large volume presentation spaces</i>, but they have hidden this information from the public. Presumably these needs are explained in the secret design briefs and facility requirements that have been withheld from public scrutiny. These baseless statements are driving the wasteful demolition and gutting of the PHM, including the demolition of 75% of the museum's exhibition galleries. It's impossible for the public or the Department of Planning assessors to understand and assess the economic, social and environmental impacts of the Powerhouse Ultimo project, based on the public information in the EIS.	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought. • Section 3.2 – in respect of design principles. • Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum. See also section 7.18.7 of Appendix L – Amended Heritage Impact Statement to the Response to Submissions.
3.2	More than \$400 million will be spent on the demolition of the Powerhouse Museum without the community seeing the critical documents that explain why a museum that is only 36 years old needs to be substantially demolished, gutted, downsized, hidden behind a row of shops, and turned into a creative industries, arts and theatre complex. These uses are not a higher cultural need than the PHM's statutory museum purpose.	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought.

	There is only one line of information in the EIS objectives that relates to the actual museum, which is the promise that three objects will return in some form somewhere in Powerhouse Ultimo.²⁰ That's it. With only three objects to place in the gutted shell of the former PHM, deprived of meaning, education purpose, narrative and thematic context, the plans in the EIS don't even show where these objects will be placed. In my more than forty years of experience in heritage and museum development, I have never seen such scant justification for a project that will likely cost \$500 million. This is on top of the \$1.4 billion for the overdue and over budget Parramatta Powerhouse.	Section 4- in respect of the development for which consent is sought as an 'information and education facility,' for use as a museum. The matter of project expenditure is addressed at Appendix D to the Response to Submissions, item OP-58. See also OP-96 and OP-97 of Appendix D to the Response to Submissions regarding the matter of programming of the museum.
4.1	The request for SEARS in February 2024 included in the project description retention and adaptative reuse of the non-heritage listed Wran building. The plans in the EIS reveal the 'heritage adaptation' scheme advanced by the proponents and their heritage consultants is about turning the Powerhouse Museum into an arts, theatre and performance facility for events, venue hire and amplified live music. The Wran building is not being retained. There is no partial demolition as detailed in the attached paper What does saving the Wran building mean. More than 80% of the Wran building will be demolished over four levels. No part of the building survived in any recognisable form.	The plans for the proposed development, including the demolition plans are contained at Appendix B to the EIS and Appendix E to the Response to Submissions.
4.2	The objectives for the development in the EIS are markedly different from the project description in the request for SEARS, 2 February 2024. They include create additional large volume presentation spaces, including a space that is capable of use in an auditorium configuration, and leverage the industrial heritage and history of the area through adaptive reuse and conservation of heritage buildings, including by reinstating the volume of the interiors of the Boiler Hall and Turbine hall, and conservation of the fabric of the Power Station with adaptation to provide for the ongoing requirements of a contemporary museum.	The objectives of the development (section 1.3) and project description (section 3) of the EIS outline the development for which approval is sought.
4.3	As the attached Joining the Dots paper demonstrates, the result of 'decluttering' the museum's exhibition galleries and mezzanines to create 'large volume presentation spaces' shows an intent to change the use of the site from the Powerhouse Museum to a performance and theatre complex. The EIS has not been transparent about this work. The RtS table OP-111 states there is no intention to provide a live entertainment precinct as part of the Powerhouse revitalisation. The Powerhouse Museum is an exhibition space primarily and the revitalisation has been led by the demand for more flexible exhibition space. ²¹ This is demonstrably false. Arup's Noise and Vibration Impact Assessment notes: A number of activities proposed to be held at the Powerhouse Ultimo may generate large crowds and include the provision of music, either in the form of background music or more focal entertainment. To facilitate assessment, a program outlining proposed activities to be held in each space of the Powerhouse Ultimo has been developed in conjunction with the design team. ²² This program of activities is secret. "Event	The EIS including the relevant technical studies such as the Noise and Vibration Impact Assessment (Appendix X) assess the proposed development in terms of the largest or highest possible impact from the range of activities that could be undertaken within the development. The Noise and Vibration Impact Assessment (NVIA) states at section 4.3: <i>A summary of the loudest proposed activities to be held within each space is provided in Table 32</i>

	scenario, 30 January 2024, Draft Population Rev A” , from DBJ Architects on the 30/01/24. 23 The bibliography also cites the “Powerhouse Ultimo - Design Competition Brief,” Museum of Applied Arts & Sciences, Sydney, 2022, which MAAS and Arts Minister John Graham refused to release, despite repeated promises of transparency. The Minister later claimed the document did not exist or was not relevant to the current plans.	Accordingly, the NVIA has assessed the impact of the loudest possible activities within the proposed development. As such the development for which approval is sought- an information and education facility- museum is not eroded by the assessment undertaken within the NVIA.
4.4	The project objectives in the EIS are flawed and spurious. The EIS fails to justify or explain the need for the large-scale demolition and the reduction of the PHM’s exhibition space by 75%, removing all the smaller scale flexible galleries in name of ‘decluttering’ the exhibition spaces. There is no evidentiary basis for this destruction of exhibition capacity on the flimsy claim the museum needs significant internal programmable volumes to meet requirements of the present and future exhibitions. This capacity already exists in the Powerhouse Parramatta. And the PHM already has these spaces in the Wran building, the Boiler Hall and Turbine Hall. The PMA has canvassed museum colleagues on this issue and finds there is no conceivable museum exhibition or activity that couldn’t be shown in the generous, flexible and resonant spaces of Powerhouse Museum as it was designed. The PHM’s current internal programmable volumes have hosted a wide variety of exhibitions and activities including light shows, concerts and circus trapeze artists. The EIS hasn’t provided evidence, analysis or explanation to support this claim, or other decisions embedded in the SSDA plans. Parramatta is designed on these principles with ‘large programmable presentation spaces’ for venue hire, performance and occasional exhibitions. There is no evidence in the EIS to explain why the Sulman award winning historic Powerhouse Museum needs to be demolished to fit the same unproven and expensive model for an arts and entertainment centre, complete with concierge desk.	The justification for the development is provided within the EIS, the Response to Submissions and the Supplementary Response to Submissions.
4.5	The EIS has failed to consider the multiple impacts of ‘decluttering’ the museum of more than 20 small and medium scale galleries used for applied arts, design, history, science, technology, interactives and international exhibitions. This includes two floors of ‘black box’ galleries in the Switch House, which will be needlessly sacrificed for the ‘concierge desk’, stairs and education spaces - after the museum’s current generous education studios are demolished. The demolition the PHM’s exhibition galleries, and the loss of the 75% of the museum’s flexible exhibition spaces will have severe impacts on the museum’s sustainability, revenue, visitor numbers, education participation, public access to collections, heritage significance, tourism and cultural reach. Without question, the Powerhouse Ultimo development will reduce the museum’s capacity to meet its statutory obligations under the MAAS Act, see below. The RtS response to these concerns is that the ‘reconfiguration’ of the museum from 23 exhibition galleries to just three, will provide a diversity of exhibition space typologies with the	The use of the proposed development is outlined in the EIS at: • Section 3.1- in respect of the uses for which development is sought. • Section 4- in respect of the development for which consent is sought as an ‘information and education facility,’ for use as a museum. See also 1.2 above of this Response.

	capacity and flexibility to enable the museum to create and present high quality, internationally leading museum exhibitions across the applied arts and applied sciences. 24 This is nonsense. There is no typology of exhibition spaces, there are just three large volume presentation spaces specifically designed for theatre, performance and amplified live music events comparable in intensity to the Coldplay concert at Allianz Stadium. 25	
4.6	The suggestion in the project objectives that the PHM does not meet international museum standards or is unable to host international travelling exhibitions is ridiculous. ²⁶ All the Powerhouse Museum spaces meet international museum standards. The PHM's exhibition spaces have been world class since the museum opened in 1988. The museum has never had difficulty attracting international exhibitions. The lack of international exhibitions at the PHM in recent years is down to the management's programming choices and curatorial focus. The building hasn't failed; it's the management that has failed. In the last five years the PHM has had a 23% drop in visitor numbers, a 56% drop in education participation, and a 211% increase in exhibition costs, see Appendix 2. This isn't because of problems with the circulation paths. It coincides with the shift to construe the PHM as a 'contemporary museum', with a focus on fashion, design and creative industries. This concept is a proven turn off for visitors and a recipe for higher costs and lower education outcomes.	The operational constraints of the current museum facilities is considered in section 3.2 of the EIS and Annexure B to Appendix C of the Supplementary Response to Submissions, where the impediments of the existing facility and the ability for these impediments to be addressed through upgrade works is outlined. See also 3.2 above of this Response in respect of programming.
5.1	The Engagement Report in the EIS does not meet the SEARS Requirements for Engagement since the consultations have been conducted in an information vacuum with no explanation or written papers on the changes to and uses of the PHM site, and the intentions of the 'revitalisation' project and its impacts. Repeated consultations when critical information is withheld, and community feedback is ignored without analysis or explanation, is arguably an abuse of process. The current and previous rounds of consultations do not meet the DPIE's required standards outlined in the Undertaking Engagement Guidelines for State Significant Projects.	The Consultation Outcomes Report at Appendix J to the EIS and Consultation Outcomes Report at Appendix G to the Response to Submissions meet the SEARs and sets out how the engagement undertaken is consistent with the relevant guidelines. See also section 5 of the EIS.
5.2	The engagement process has failed to identify and engage with people and communities affected by the development. It has not recognised that the Powerhouse Museum is a state museum, funded by NSW taxpayers, with connections to families and communities all over NSW who have an association with and an interest in the PHM. Numerous groups are listed in the engagement report but were not consulted. I rang a number of museums from regional NSW and asked they were consulted on the Powerhouse Ultimo project and they said no. This includes affiliated societies and regional and community museums. The museum's Life Fellows, benefactors and donors were also ignored. There is no greater obligation of trust than what is owed by a museum to its donors when it has acquired important objects and family heirlooms. From the time the Powerhouse Museum project was announced in 1979 thousands of families donated their treasured objects. Their gifts were prompted by public enthusiasm for	The Consultation Outcomes Report at Appendix J to the EIS and Consultation Outcomes Report at Appendix G to the Response to Submissions meet the SEARs and sets out how the engagement undertaken is consistent with the relevant guidelines. See also section 5 of the EIS. It is noted that both the EIS and the Response to Submissions were also publicly exhibited.

	the Powerhouse Museum project. They had a reasonable expectation that the state of NSW would ensure that the Powerhouse Museum in Ultimo would be a permanent museum for future generations, and that successive governments would continue to operate the museum and maintain its state of the art collection facilities and exhibition areas. This trust has been breached in every twist and turn in this destructive saga.	
5.3	The proponents during the consultations failed to disclose to participants clear and concise information about the project and its impacts, as required by the DPIE's Engagement Guidelines. Basic information is still missing from the EIS and plans on the scale of demolition of the Powerhouse Museum. Misleading Fact Sheets appeared on the PHM and INSW websites with false statements about the amount of exhibition space in Powerhouse Ultimo, while in public, under oath, and in writing spokespeople disputed the 75% reduction in the PHM's exhibition space, information drawn from the museum's own documents and original plans. Notably the RtS does not repeat these false statements on the reduction of exhibition space. Instead it makes nonsense claims not supported by any evidence in the EIS or RtS papers. 27 Surveys used artificially structured questions that required multiple boxes to be ticked. If only one or no option was the answer participants were unable to move to the next page. People were asked if they wanted the museum renewed, without the proponent revealing their definition of 'renewal' means the demolition of all trace of the 1988 Powerhouse Museum and the site being turned into an performance, venue hire and creative industries precinct, with the former museum's mission shifting to a focus on fashion, design and creative industries, not education and exhibitions of the museum's collection. The EIS claims the proposal to gut, erase and demolish all trace of the PHM is based on consultation. But consultation in an information vacuum is not a genuine or credible.	See 5.1 above of this Response.
5.4	In the September 2020 and March 2022 consultations no mention was made of the plans for a creative industries precinct in the former Powerhouse Museum, or what impacts this would have on the museum's functions, spaces and facilities. No mention was made of plans for a theatre on the PHM site. No mention was made that the Harwood building would not be part of the PHM, and would cease to operate as the museum's purpose designed collection, conservation, workshop and research centre. The inaccessible J Store development at the Museums Discovery Centre at Castle Hill was approved partly on the basis of the 'applicant's' false assurances that the proposal does not seek to replace existing operational or functional components of the Powerhouse. In fact this was one of the aims of the EIS. Now the Harwood building has been excised from the current EIS, despite the heritage listing recognising that is part of the Powerhouse Museum Complex. Millions of dollars will be wasted inserting a small loading dock under the Switch House when just 30 metres away the PHM has an expansive	The consultation processes undertaken in September 2020 and March 2022 were not undertaken in relation to or for the Powerhouse Ultimo Revitalisation project. The Harwood Building continues to be part of the Powerhouse Museum Complex notwithstanding no works are proposed to that building as part of this development application.

	loading dock capable of unloading a pantechnicon under cover. This is typical of the destructive waste	
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