

Marcus Jennejohn
Planner – Powerhouse Parramatta
Department of Planning, Industry and Environment
By email: marcus.jennejohn@planning.nsw.gov.au

10 December 2020

Dear Mr Jennejohn,

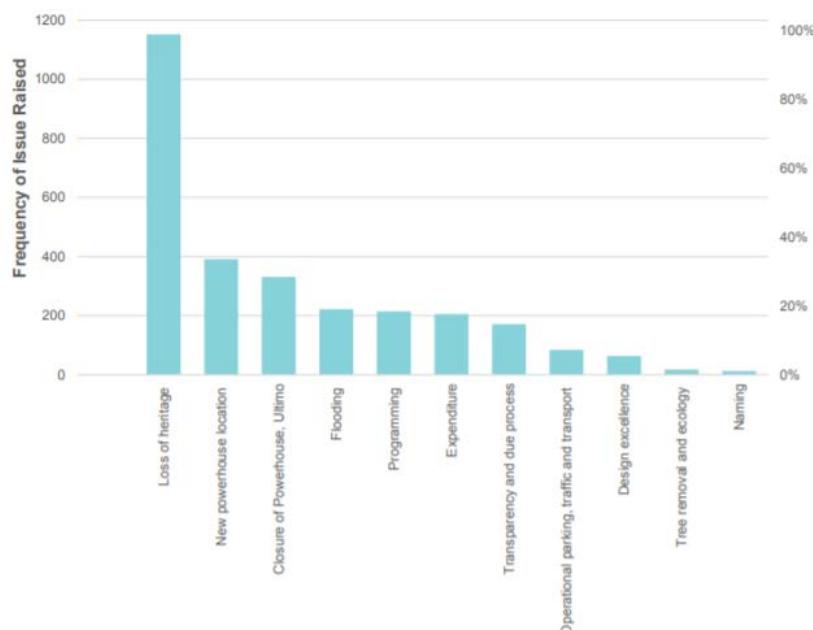
Re: Parramatta Powerhouse Heritage Impact Statement

The National Trust strongly object to the inadequate heritage impact assessment undertaken for St George's Terrace as part of the Parramatta Powerhouse proposal (SSD-10416).

The National Trust have welcomed the decision to retain the Powerhouse at its Ultimo site and applaud the listing of the original Powerhouse Building on the State Heritage Register by Minister Harwin on 4 September 2020, however we continue to have grave concerns over the proposed new Powerhouse Museum at Parramatta and the heritage impacts this building will have.

The National Trust continue to receive comments from our members and the general public in relation to the Parramatta Powerhouse proposal, and these largely align with the comments made available on the NSW Planning Portal. The Trust note that of the 1269 public submissions to the original proposal, there were just 26 letters of support, and 20 comments (excluding one "test" comment by the department itself). This leaves 1222 (or 96%) of people objecting to the original proposal.

The Trust refer to the *Powerhouse Parramatta - Response to Submissions and Amended Proposal Report* by Ethos Urban (08 October 2020, page 8) that the issue most frequently identified in the above submissions was "loss of heritage", as shown in the "Breakdown of Categories" graph from that document below.





In the most recent round of public submissions (relating to the relocation of Willow Grove) there were zero letters of support or comment, with 100% of the 35 submissions objecting.

It is for the above reasons that the NSW Government must strongly consider the heritage impact of the revised museum proposal. The proposal to “relocate” Willow Grove has been identified as being poor heritage practice, and now the partial retention of St George’s Terrace is going to also represent the very worst of contemporary attitudes and responses to heritage. Devoid of meaning, the remaining terraces will look simply like a postage stamp stuck on the corner of this new building – clearly a historical imposition rather than a celebration of Parramatta’s heritage, or indeed a considered component of new museum such as occurred at the Museum of Sydney site.



Photomontage of the “revised” Powerhouse Parramatta (Source: Moreau, Kusunoki and Genton, 2020). The structure, form and material of the building clearly bears no relationship to the remaining sections of St George’s Terrace. This is a bad outcome for both the historic building, and for the new structure in terms of design integrity.

The heritage impact of the revised design needs to be appropriately assessed as part of the planning process. The National Trust wishes to raise its concerns with the recently tabled *Addendum Statement of Heritage Impact – St George’s Terrace* (2 November 2020) prepared by Advisian.

Under the Planning Secretary’s Environmental Assessment Requirements (SSD-10416) for the project, it states the following in relation to Heritage (National Trust emphasis in bold):

*The EIS shall include a Statement of Heritage Impact (SOHI), prepared by **a suitably qualified heritage consultant** in accordance with the guidelines in the NSW Heritage Manual. The SOHI is to address the impacts of the proposal on the heritage significance of the site and adjacent areas, and is to:*

- *identify all heritage items (state and local and potential) and conservation areas within and near the site, including built heritage, landscapes and archaeology, include detailed mapping of these items and an assessment of why the items and site(s) are of heritage significance*
- *assess the impacts of the proposal on the heritage significance of these items and conservation areas, including visual and physical impacts, vibration, demolition, archaeological disturbance, altered historical arrangements and access, visual amenity, landscape and vistas, setting, and curtilage (as relevant)*



- *address compliance with any relevant Conservation Management Plan, addressing any proposed adaptive reuse and measures to minimise impacts on the building*
- *demonstrate attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site and the surrounding heritage items heritage conservation areas*
- *demonstrate engagement with appropriate local stakeholders.*

The National Trust are greatly concerned that the authors of this document, Alex Pappas and Thea Kane (from our own research, which we would be pleased to have clarified if incorrect) appear to have recent qualifications in Chemical Engineering and Environmental Science respectively – hardly relevant to the assessment of the heritage impacts of a major planning application. In the past, the Trust has objected to unqualified professionals providing heritage advice. Such an outcome would not be acceptable for any other professional report.

For a government project of such importance, the Trust would expect that those responsible for preparing a project brief for such a document would have insisted that the authors of such a document meet the requirements of the NSW Heritage Office's guidelines relating to the required skills of a heritage advisor, which include:

- *Have appropriate professional tertiary qualifications in a heritage related field*
- *Have a good working knowledge and experience in current heritage management theory and practice, including the Australia ICOMOS Burra Charter and Heritage Branch management publications;*
- *Be reasonably knowledgeable and experienced in heritage and urban design matters (in theory and practice) and be able to address matters efficiently and effectively.¹*

The report has many concerning and/or inadequate assessments of the heritage impact of the proposal, and does not constitute an acceptable assessment. The National Trust make the following observations:

Advisian Report	National Trust Response
St George's Terraces presently contains two main external sections: original rendered brick with chimneys and brick rear addition. (p.14)	This does not make sense. A far more detailed assessment of the various built elements is required.
Modifications and current condition Remaining internal fabric includes modest fireplaces and potentially some internal walls. (p.14)	A serious heritage assessment should be able to identify what walls are original and what are not, not whether they are "potentially" original. There is no drawing of the existing floor plans or elevations to show an assessment of significant fabric and what the impact will be on such fabric.
It is understood that it is unlikely to be any intact rear wall remaining due to previous alterations. (p.20)	This is an inadequate assessment. Surely the consultant (during their physical inspection) would have been able to determine if any original wall element remained or not.
Is the demolition essential for the heritage item to function? Partial demolition to the heritage item is limited to approximately 1.688 metres of the original brick structure (to the east and west elevations)... The demolition is required to enable construction of the Powerhouse Parramatta. This would allow for the retention, conservation and adaptive reuse of most of the original brick structure fronting Phillip Street as part of the Powerhouse Parramatta (p.20)	Nowhere does the report clearly identify the extent of demolition or make an assessment of this. Any new building could (and must) be designed around the existing historic structure. Demolition should not be necessary to build the new building. No reasons have been provided as to why this is not the case.

¹ <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Heritage/how-to-establish-heritage-advisor-service-130214.pdf>



<p>Is the detailing of the partial demolition sympathetic to the heritage significance of the item? The demolition of a small section of original fabric is sympathetic to the item as it facilitates the retention of the traditional form and height of St George's Terrace when viewed from Phillip Street. (p.20)</p>	<p>This is an inadequate assessment. The demolition of original fabric needs to be clearly identified and assessed.</p>
<p>Why is the new development required to be adjacent to a heritage item? Due to the location of the site next to the river, museum buildings are set back from the river to address flood constraints. As a consequence of these features and constraints, the new development is required to be adjacent to a heritage item. (p.21)</p>	<p>The inappropriate siting of the new museum is not considered an adequate reason to justify impinging on a heritage item.</p>
<p>How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance? The curtilage of St George's Terrace contains all fabric that contributes to heritage significance (p.21)</p>	<p>The consultant clearly has no knowledge of what heritage curtilage is. Are they saying that St George's Terrace actually contains its own curtilage? There is no assessment of the impact on the curtilage of St Georges Terrace.</p>
<p>How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects? The new development would not affect views to and from the front (Phillip Street) elevation of the heritage item. (p.21)</p>	<p>Is the consultant seriously suggesting there will be no change to the current Phillip Street elevation of the building by building a new museum directly behind? This is not an acceptable assessment.</p>
<p>Is the new development sympathetic to the heritage item? Yes. The retention of the St George's Terrace will maintain its core heritage significance with regard to its high degree of integrity when viewed from Phillip Street... The item's retention would also contribute to an increased level of visual amenity and result in a more sympathetic response to the existing Phillip streetscape compared to the original proposal for total demolition in this location. Overall, the new development's form, siting, proportions and design detailing is responsive and sympathetic to the context and setting and significance of St George's Terrace (p.21)</p>	<p>The revised design is no different in any way to that previously put forward in relation to the retention of St George's Terrace. A Heritage Impact Statement must be an honest and objective assessment of heritage impact. To say that the proposed new museum, which requires partial demolition of the heritage item, is sympathetic is clearly not the case.</p> <p>Numerous examples (eg: the development of Governor Macquarie Tower which retained the original terraces, or of Grosvenor Place which retained historic buildings) show a more considered, if not necessarily always sympathetic, approach can be achieved. This scheme does not.</p> <p>There is nothing about the form, scale, material, proportions or siting of the new building that suggests an appropriate response to the existing heritage building.</p>
<p>Will the additions visually dominate the heritage item? How has this been minimised? Not applicable. The new development is not an addition to the heritage item. (p.21)</p>	<p>This is the core question that must be addressed in this document, and the consultant claims this is not applicable!</p> <p>This omission alone indicates that this entire report is not a valid assessment of the heritage impact of the proposed development on St George's Terrace.</p>



It is considered that the new development's form, siting, proportions and design detailing is responsive and sympathetic to the context and setting and significance of St George's Terrace. The proposed signage zones will be complementary to the character and aesthetics of the new development and its setting. (p.23)

To claim that the new building, which has not been altered in any way from the original design, is "responsive and sympathetic" to St George's Terrace is plainly untrue.

The National Trust request that a legitimate Heritage Impact Statement for the proposal be prepared by a suitably qualified and experienced heritage practitioner that adequately assesses the heritage impact of the proposal.

We would be only too pleased to continue a discussion with you on this matter.

Kind regards,

David Burdon
Conservation Director

COPY to: NSW Heritage Office

