

Winkworth Rebuttal of the EIS/ RTS Site Assessment Requirements

The Secretary's Requirements (SEARS) for the EIS required the EIS to consider, among a range of social impacts, **all remaining feasible alternatives and comparatively analyse their respective impacts and benefits** (EIS, p.18). The analysis below demonstrates that this has not been done. The EIS/RTS is not compliant with the SEARS social impact assessment requirements, section 8.

	EIS / RTS And Amended Proposal New Powerhouse Location 8 Oct 2020 ¹	Winkworth Comment
1	The then NSW Premier and Deputy Premier released the <i>Create in NSW: NSW Arts and Cultural Policy Framework</i> and announced the Government's decision to investigate the creation of Powerhouse Parramatta , p.11	In fact the then Premier Mike Baird announced the PHM would be moving to Parramatta in November 2014. This was reiterated in February 2015. It was a government commitment at the March 2015 election. The Cultural Policy Framework followed six months after the announcement in May 2015. ² There was no investigation of options. There was no analysis of museum needs and opportunities for Parramatta. The decision to move the Powerhouse had already been made. It was pre-determined before the EIS, and never analysed in the EIS.
2	In discussion of the background and strategic need for the Powerhouse Parramatta the EIS discusses the <i>State Infrastructure Strategy Update 2014</i> , where Infrastructure NSW (INSW) proposed the development of a Parramatta Cultural Precinct and recommended that, before any further public investment was made in the Powerhouse at Ultimo, urgent consideration should be given to Powerhouse's potential relocation to the Parramatta Cultural Precinct. This was later reinforced in the NSW Government's Cultural Infrastructure Strategy 2016. ³	The decision to relocate the Powerhouse Museum was pre-determined before the Cultural Infrastructure Strategy and before EIS. It was grounded in the INSW State infrastructure Update 2014. INSW are the client in the Powerhouse Parramatta development. The strategic need for the project was not substantiated or independently investigated in the EIS. The 24 April 2018 Final Business Case supplement notes: <i>Although not defined at its inception by unmet demand like similar large scale infrastructure projects, the Project through the act of relocation ultimately begins to address the cultural demands of Western Sydney...</i> ⁴
3	Following that announcement, Create Infrastructure NSW initiated and led the development of the planning framework for Powerhouse Parramatta. This included a site selection assessment which concluded that the Riverbank site in Parramatta was the preferred site for the new museum, based on a range of criteria including size, existing conditions, location and opportunities to deliver expanded benefits in conjunction with other civic projects (i.e. the Parramatta River foreshore and the Civic Link), p.11	This 'planning framework' and site selection assessment has never been made public. The criteria including the size requirements and thematic focus of the new museum have never been revealed. What sites were assessed? The public were told that only two sites were examined: the Mays Hill Golf Course in Parramatta Park and the DJs carpark/ Phillip St site. Why wasn't the Fleet St precinct included in the site selection assessment, a more expansive site in government ownership? The policy underpinnings of the project, and the site selection criteria as to size, location and opportunities have never been revealed. In regard to the size of the site relative to the museum's needs, the Phillip St site is obviously too small and flood prone, leading to many design compromises and risks.
4	The EIS includes a detailed analysis of the site's suitability and project alternatives, in accordance with the requirements of the SEARs and the EP&A Regulation.	This is not correct. Where is this information? If it is section 1.4 in the EIS Report this is not a detailed analysis of the site's suitability or project alternatives. ⁵ The 8 Jan 2018 Extended Final Business Case v.4.0 (EFBC) did not investigate project alternatives. ⁶ The base case or 'do nothing' option in the 2018 EFBC was no museum at Parramatta and no museum at Ultimo, 4.4.1, p.42. No other museum types, options or locations were ever considered. The content of option 2 on p.14 of the EIS Report is not revealed. The discussion under option 2 on p. 14 of the EIS is entirely a discussion of option 3 and its purported

		merits. ⁷ The statement that the Powerhouse Parramatta is required to activate the riverbank and support the night time economy is an assertion that is not related to the case for a family and education-focussed science and technology museum. Another type of cultural facility such as a theatre would be better calibrated to support the night time economy and activate the riverbank after working hours. There is no evidence a theatre or entertainment complex on the site was considered.
5	The Government confirmed this decision and announced its choice of the Riverbank site in April 2016. The Riverbank site was acquired by the NSW Government to facilitate the delivery of the project in early-2019. p.11.	The Government went ahead with the site acquisition without considering other museum options or locations that were less constrained. ⁸ These decisions were not independently reviewed and analysed by the EIS. It was a given. Of note, the CoPCC Cultural Strategy, which highlights the city's notable cultural themes and needs, was not considered in the decision.
6	Section 1.4 of the EIS cites the analysis of the alternatives in the publicly released INSW Final Business Case Summary, April 2018.	In fact the alternatives in the INSW FBC Summary differ markedly from the alternatives in the Johnstaff EFBC 8 Jan 2018, see 4 above and note 6 below. The INSW options are variations on only one museum option which is relocation of the Powerhouse to the Riverbank site. ⁹ The three 'options' discussed are only size and cost variations for a science museum on the Parramatta Riverbank.
7	Analysis of alternative locations has already been undertaken by the NSW Government, resulting in the selection of the subject site as the most suitable, and is not relevant to this planning assessment process. P.11	This is not correct. As noted above the analysis of alternative locations has never been released. Nor has the selection of this site been explained. This missing explanation is very relevant to the EIS and the planning assessment process since the selected site is constrained, the development has a destructive impact on Willow Grove, it is destructive of Aboriginal heritage, and it carries serious flood risks, among other social and heritage impacts.
8	Under 8 Social Impacts, the Secretary's Requirements asks the EIS to: consider all remaining feasible alternatives and comparatively analyse their respective social impacts and benefits ¹⁰	The EIS does no address SEARS requirements for discussion of feasible alternatives , nor does it provide a comparative analysis of the social impacts and benefits of any alternate sites. We ask the EIS to do this analysis and consider relocation of the project to the Fleet St heritage Precinct.
9	After the EIS was on exhibition the NSW Government announced on 4 July 2020 that the Powerhouse Museum would be staying in Ultimo. After this announcement the RTS should have recalibrated the EIS and considered all remaining feasible alternatives and other site options, as required by SEARS.	The decision to keep the Powerhouse Museum in Ultimo invalidates much of the case on which the EIS rests, namely that the whole Powerhouse Museum would be relocated to Parramatta requiring a very large building to in any way approximate the real Powerhouse Museum; that the Powerhouse in Ultimo could not be renewed on its current site; that it was relatively remote and not on a cultural ribbon and must be moved to be renewed. ¹¹ Now the NSW Government is advancing plans for the PHM's Ultimo renewal as part of arts and cultural precinct. This leaves the Powerhouse Parramatta development without a compelling rationale. It duplicates what the PHM at Ultimo does, instead of developing a distinctive new museum in Parramatta, based on the community's cultural priorities as expressed in the CoPC's Cultural Strategy, and developed on an alternative site which conserves heritage instead of destroying it.

In conclusion, the EIS does not address SEARS requirements for discussion of **feasible alternatives**, nor does it provide a comparative analysis of the social impacts and benefits of any alternate sites. Following the NSW Government's decision to keep the Powerhouse Museum in Ultimo the Parramatta project should have a new EIS/ RTS with a fresh analysis of the options and alternatives for a distinctive new museum for Parramatta and Western Sydney that is thematically resonant with the history and cultures of the place. The Fleet St Precinct should be included in a comparative analysis of impacts and benefits.

Kylie Winkworth

December 2020

Museum and heritage consultant, Powerhouse Museum Alliance

¹ Powerhouse Parramatta Response to Submissions and Amended Proposal 8 October 2020
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-2839%2120201008T013740.172%20GMT>

² https://www.create.nsw.gov.au/wp-content/uploads/2015/02/ARTS-NSW-Policy_13-MAY_web-1.pdf

³ Ethos Urban Powerhouse Parramatta, Environmental Impact Statement, May 2020, 1.2 Strategic Need, p.12
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10416%2120200602T052935.510%20GMT>

⁴ Johnstaff Final Business Case (supplement) The New Museum in Western Sydney, 24 April 2018, V.6.0, p.2
<https://powerhousemuseumalliance.com/wp-content/uploads/2018/06/new-western-sydney-museum-2-final-business-case-supplement-240418.pdf> See also Johnstaff Final Business case The new Museum in Western Sydney, 8 January 2018, v.4.0, 3.3, p.24

⁵ Ethos Urban Powerhouse Parramatta Environmental Impact Statement, May 2020, p.13-14
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10416%2120200602T052935.510%20GMT>

⁶ For the 8 January 2018 Business case papers: <https://powerhousemuseumalliance.com/wp-content/uploads/2018/06/new-western-sydney-museum-1-final-business-case-0801181.pdf>

⁷ Ethos Urban Powerhouse Parramatta Environmental Impact Statement, May 2020, 1.4, p.14
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10416%2120200602T052935.510%20GMT>

⁸ Powerhouse Parramatta Response to Submissions and Amended Proposal 8 October 2020, p.11
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-2839%2120201008T013740.172%20GMT>

⁹ Infrastructure NSW, Final Business Case Summary: Powerhouse Museum in Western Sydney April 2018

¹⁰ Ethos Urban Powerhouse Parramatta Environmental Impact Statement, May 2020, Social Impacts, 1.5, p.18
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10416%2120200602T052935.510%20GMT>

¹¹ See also Kylie Winkworth; INSW; Stitching up the Case to sell the PHM;
<https://powerhousemuseumalliance.com/what-the-experts-say/infrastructure-nsw-stitching-up-the-case-to-sell-the-phm/>