

Attention Marcus Jennejohn,

I am writing this submission to the NSW Department of Planning, Industry and Environment to voice my objection to the Powerhouse Parramatta project proposal currently open for public exhibition. While the construction of a museum in Parramatta is a positive development that will significantly benefit Parramatta and Western Sydney, the proposal in question entails the unnecessary and unacceptable destruction of existing heritage buildings, most notably Willow Grove.

For the reasons outlined in this submission, I implore you to reject this project proposal and instead seek out an alternative proposal for a museum in Parramatta that does not require the demolition of existing heritage buildings. The reasons for my objection to the project proposal are as follows:

1 – The destruction of heritage buildings is unjustified and inappropriate.

The irony of requiring heritage buildings to be demolished to construct a building intended to preserve heritage items should be painfully apparent. Despite this, the argument repeatedly made by the proponents of this proposal to justify the demolition of heritage buildings is, effectively, that the museum will itself serve as a new institution of both significant heritage value and value to heritage preservation (EIS, p. 141).

This argument is based on unsound reasoning. Objects of heritage are defined as such for the very reason that they are *not* able to be replaced or substituted. Destroying a heritage building remains a loss of heritage regardless of what measures might be taken after the event to supposedly compensate for it. The argument justifying the current proposal implies that the nature of this development alone somehow makes the destruction of existing heritage buildings excusable. It does not. Despite a lengthy design and planning process, this project proposal still offers no compelling argument as to why the demolition of heritage buildings is necessary to deliver this project.

The designation of heritage must mean something – it cannot be treated as a mere label that can be disregarded without consequence. Parramatta proudly remains a city with many heritage buildings still standing that provide citizens with a strong connection to place and sense of identity. As Parramatta quickly becomes Sydney's second CBD, development within and around the city is only set to increase. The approval of this proposal, and the demolition of heritage buildings it demands, risks setting a dangerous precedent that could legitimise the destruction of heritage sites across Parramatta should they pose an impediment to development. The new Parramatta museum must act to preserve heritage in all forms – not simply that which resides within its walls.

2 – The planning process has not appropriately considered preservation of heritage.

Documents provided as part of the public exhibition of this project proposal demonstrate disregard for the preservation of heritage buildings. It is claimed that:

“The submitted concept designs made clear that it is not possible to deliver on the design ambitions of the brief and deliver connectivity while retaining local heritage items.”

- Powerhouse Parramatta: Design Excellence Report, p. 18

However, while it is claimed that architectural teams competing to create design proposals for the Powerhouse Parramatta project were encouraged to “consider aspects of heritage and cultural significance within their submissions” (EIS, p. 14) the brief which informs these design proposals openly permits the demolition of heritage buildings:

“To enable the best Museum outcome and support the Civic Link we are requesting that all submissions consider the removal of Willow Grove, should it be required.”

- Powerhouse Precinct at Parramatta Stage 2 Design Brief, p. 174

Furthermore, the design brief repeatedly suggests that heritage within the site area be preserved through “interpretation” of such heritage by the to-be-constructed museum (Ibid. p. 180, 200, 247), further implying that retention of heritage buildings need not be considered. As such, the brief presented the notion to designers that demolition of heritage buildings was not only necessary but acceptable. It is therefore misleading to claim that “submitted concept designs” precluded the possibility of preserving heritage buildings when a position to demolish them had already been adopted before the final design phase. This is confirmed by the *Statement of Heritage Impact* prepared by Advisian which states:

“It is considered that no alternatives schemes were considered during the design process which could have retained ... Willow Grove”

- Statement of Heritage Impact, p. 78

Given this, it is unsurprising that only one of the five shortlisted designs for Powerhouse Parramatta (the Steven Holl Architects and Conrad Gargett design) sought to preserve the Willow Grove heritage building. Considering this design, the *Design Competition Jury Statement* (MAAS website) provides what appears to be the only published assessment of a proposal to retain Willow Grove as part of this project – notably absent from any documentation provided as part of the public exhibition of this project. This statement provides five sentences dismissing the retention of Willow Grove, citing the lack of a “deeper rationale” and a supposedly “jarring” visual “juxtaposition” of the building with the built form of the museum. This reductive assessment of the utility and aesthetics of a heritage building is neither appropriate nor sufficient to justify its demolition. Instead of project overseers demonstrating fair cause to demolish heritage buildings, designers were instead obligated to justify why they should be retained – a highly improper process which presupposed the needless demolition of heritage buildings from the outset.

3 – The Civic Link project does not necessitate the demolition of Willow Grove.

In addition to the flawed argument that the construction of a museum in Parramatta is itself adequate compensation for the demolition of Willow Grove, the realisation of the Parramatta Civic Link project – a public pedestrian walkway providing direct access from Parramatta River to the city centre – is used erroneously as further justification for the destruction of this heritage building as part of this project proposal.

The current project proposal places great emphasis on enabling the Civic Link (EIS, p. 78, 88-89) and suggests that demolition of Willow Grove is necessary to achieve this as the building occupies space intended for the planned pedestrian route. In considering Steven Holl Architects and Conrad Gargett’s design that retained Willow Grove, it was noted that:

“Retaining Willow Grove was considered particularly problematic, as the building interrupts the Civic Link, blocking the direct connection of the city and the river.”

- Design Competition Jury Statement (MAAS website)

This is a laughable assertion given that the entire eastern side of the project site in this design proposal is denoted as open, public space passing uninterrupted beneath a museum building engineered to be elevated above the ground. In fact, of all five shortlisted designs, the proposal by Moreau Kusunoki and Genton (now comprising the selected proposal for Powerhouse Parramatta) allocates the *least* amount of space to this supposedly critical link between the city and the river – reducing the Civic Link to a narrow, treeless lane sandwiched between the two buildings of the proposed museum (Figure 1). Furthermore, the design brief specifies that the Civic Link need not be “a direct north-south connection” (p. 186). This contradicts the rationale of the Design Competition Jury and the argument that retention of Willow Grove compromises “connectivity” when there is no requirement that the Civic Link must pass directly through the site of this heritage building.

It is highly misleading for this proposal to imply that Willow Grove is an obstacle to the Civic Link project and therefore must be demolished. The *Civic Link Framework Plan*, endorsed by Parramatta Council, seeks to retain and incorporate not only Willow Grove but also its heritage garden into the Civic Link to create a continuous “green spine” of tree cover from Parramatta Square to Willow Grove. The plan clearly requests that:

“Design responses should look to integrate Willow Grove and its landscape setting with the forecourt, and entrance of MAAS.”

- Civic Link Framework Plan, p. 104

Comprising the “critical connection” of the “River Link”, the retention of Willow Grove aims to “create a seamless transition between the Civic Link and River Precinct, reinforced by expanded vistas and connections” (p. 105). The plan sees pathways maintained either side of Willow Grove which continue alongside the “green spine” from Parramatta River to Parramatta Square (Figure 2). This design proposal for Powerhouse Parramatta demonstrably ignores the Council’s mandated vision, instead featuring a confined, narrow lane devoid of foliage in stark contrast to the open, leafy avenues intended for the remainder of the Civic Link – eliminating any “seamless transition” to the river foreshore.

The *Design Excellence Strategy* states that the design concept for Powerhouse Parramatta should demonstrate “due regard for Council’s civic link and riverside strategies” (p. 3). Furthermore, community feedback on the *Civic Link Framework Plan* indicated that “Parramatta’s heritage is crucial and should be both retained and celebrated” (p. 109). The proposal for the Powerhouse Parramatta project objectively fails to respect what remains an entirely reasonable request from local government and the general public that heritage buildings and open, green space be maintained as part of any development relating to the Civic Link. The attempt by proponents of this proposal to falsely suggest that the Civic Link project cannot be delivered without demolishing Willow Grove is highly disappointing and cannot be left unchallenged – it is the museum proposal itself that is incompatible with the Civic Link project – *not vice versa*.

4 – Changed circumstances demand that the proposed design be reconsidered.

Three key developments have occurred since the proposed plan for the Powerhouse Parramatta project was finalised which significantly challenge the validity of the case that this project should be allowed to proceed in its current form:

1. The decision by the state government to no longer relocate the existing Powerhouse Museum in Ultimo to the Parramatta site.

The sudden cancellation of plans, upheld by the state government since 2015, to relocate the contents of the Ultimo Powerhouse Museum to the new Powerhouse Museum in Parramatta has led to great uncertainty about exactly what the Parramatta Museum will now showcase. Even if a significant portion of the Ultimo museum's collection is transferred to the Parramatta site, these changed plans represent a major deviation from the initial design brief which was based upon the assumption that the Powerhouse collection was being relocated in its entirety. Given this uncertainty, it would be inappropriate to approve the proposed project at this time. Instead, the project should return to the design phase to implement changes necessitated by these circumstances – including the reassessment of plans to demolish heritage buildings.

2. The NSW CFMEU sanctioned “Green Ban” on the demolition of Willow Grove and St George's Terraces.

The decision by the state's construction union to partake in coordinated strike action that would prevent work to demolish the heritage buildings within the project site represents a significant impediment for the proposed project should it be approved. Approving the demolition of heritage buildings demanded by this proposal would not only bring workers and citizens alike into direct conflict with the project's construction – it poses unnecessary financial and logistical risks for the project – risks which could easily be avoided by revising the project design to guarantee the retention of heritage buildings.

3. The growing community and professional opposition to the project proposal.

Since the selected proposal for the new Parramatta Museum has been made public, opposition to the project has only become more strident. While the demolition of heritage buildings remains a key concern, questions have also been raised regarding whether the museum is fit for purpose without permanent onsite storage or conservation laboratory facilities – oversights which disqualify the museum from accepting loans from overseas institutions. Other protestations range from criticisms that the design is unflattering (and not reminiscent of a museum) to hydrology experts raising grave concerns that the museum will be at intolerable risk of flooding. Approving this proposal signifies the deliberate disregard of genuine concerns still surrounding the Powerhouse Parramatta project that are yet to be adequately addressed and eliminates any chance of substantially improving what, unfortunately, remains a deeply unsatisfactory project proposal.

[continued]

Submission summary

The demolition of heritage buildings necessitated by this project proposal is unwarranted and unacceptable. The proposal blatantly ignores both community demands to retain heritage buildings and carefully considered local government plans to integrate heritage buildings with future civic development.

Parramatta and Greater Sydney deserve a museum that citizens can be proud to call their own. If approved, the current proposal risks the museum becoming an object of derision – representing the destruction of identity and place, the failure of planning regulation to avert unfettered development and the callous overriding of local autonomy by state government.

The decision by overseers of the Powerhouse Parramatta project to conduct a planning process which presupposed the demolition of heritage buildings from the outset is an indictment of this proposal. In the face of unrelenting professional and community led opposition to the destruction of heritage buildings, it cannot be claimed that this approach was appropriate in determining the design of the Parramatta museum.

The diversity of architectural approaches presented by the shortlisted designs for this project demonstrate the clear potential for an alternative proposal for Powerhouse Parramatta to be produced that guarantees the retention of heritage buildings and realises Parramatta Council's intended vision for the Civic Link – either through modest modifications to the current proposal or the selection of a new or pre-existing design.

For the reasons outlined in this submission, I implore you to reject this project proposal.

Sincerely,

A handwritten signature in black ink that reads "B Koschinski". The signature is written in a cursive, slightly slanted style.

Benson Koschinski

[figures and references overleaf]

Figures



Figure 1.

Graphic representation of the open space comprising uninterrupted pedestrian access between the river and the proposed Civic Link by each of the five shortlisted designs for the Powerhouse Parramatta project. Note that the Moreau Kusunoki and Genton proposal (red), the selected design for this project, allocates the least space for this pedestrian connection of all of the shortlisted designs. In addition, although only the Steven Holl Architects and Conrad Gargett proposal (pink) retained both heritage buildings, at least two other shortlisted proposals also appear to provision enough open space to retain the Willow Grove heritage building.

Source:

Benson Koschinski, *Google Earth*

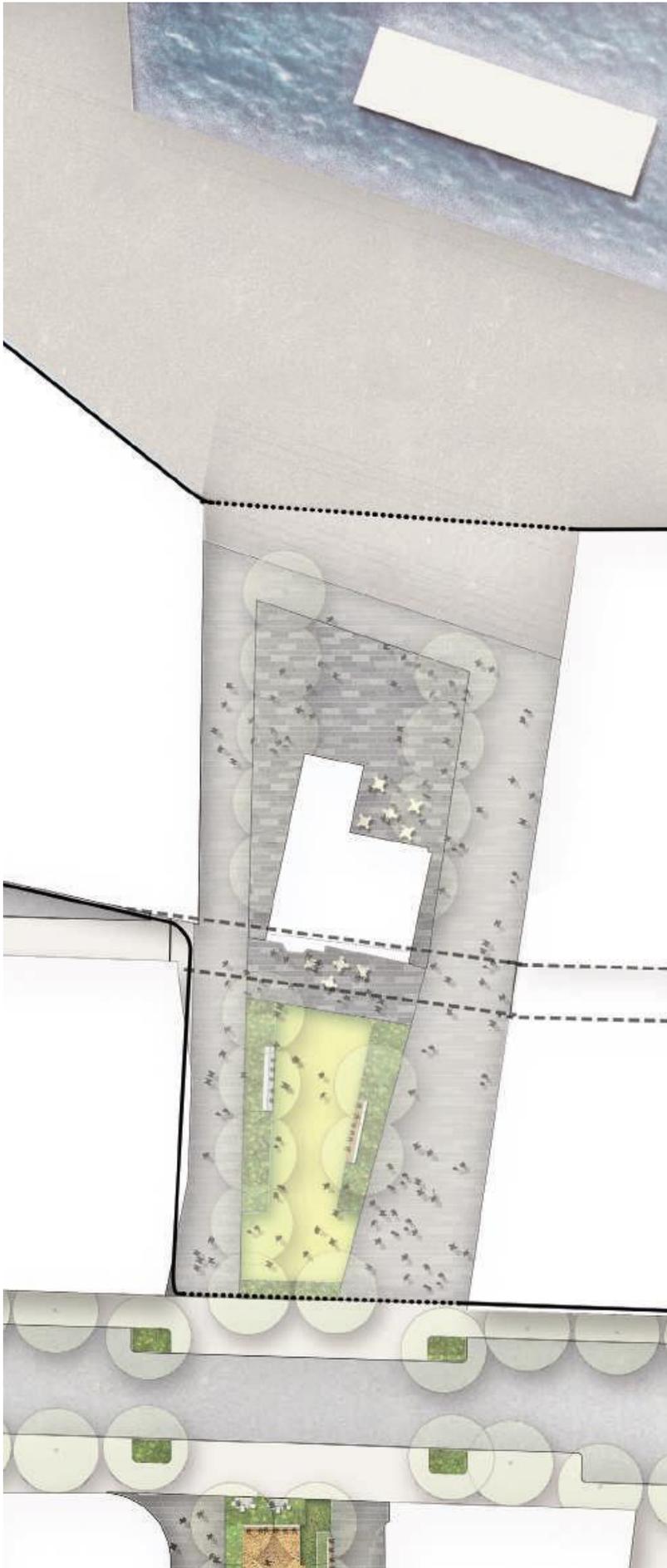


Figure 2.

An indicative architectural design plan demonstrating the retention of the Willow Grove heritage building and the integration of both the building and its garden with the proposed Civic Link project. Note that the garden of Willow Grove extends the central “green spine” of the remainder of the Civic Link.

Source:

Civic Link Framework Plan,
p. 104

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References

[Civic Link Framework Plan](#)

[Jury Statement – Steven Holl Architects \(United States\) and Conrad Gargett \(Australia\)](#)

[Media Release – CFMEU places Green Ban on Parramatta Powerhouse sites](#)

[Phillip Street and 338 Church Street, Parramatta – Environmental Impact Statement](#)

[Powerhouse Parramatta – Design Excellence Report/Strategy/Stage 2 Design Brief](#)

[Powerhouse Parramatta – Statement of Heritage Impact](#)