

National Trust of Australia (NSW) Parramatta Regional Branch

OBJECT to the Powerhouse Parramatta

The position of the National Trust of Australia (NSW), Parramatta Regional Branch

While the Parramatta Branch has a specialist interest in maintaining and protecting heritage in the Parramatta region, the Parramatta Branch also has more than a passing interest in Parramatta as an important part of Sydney. The Parramatta Branch has adopted the reasonable approach that heritage items and heritage conservation areas should not be seen as an inconvenience in the development process but a legitimate part of the development process by providing tangible links and the ability to understand the growth of Parramatta. Heritage buildings can provide an exceptional contrast and balance to modern concrete and glass structures and provide a more hospitable environment for workers and visitors to Parramatta.

In summary, the **Parramatta Branch's objections** to the current "Parramatta Powerhouse" proposal are:

1. demolition of Willow Grove and St. George's Terrace as they are highly significant to Parramatta.
2. the EIS does not consider alternate sites for the development that would conserve the two heritage listed items – Willow Grove and St George's Terrace, contrary to the the Secretary's Environmental Assessment Requirements (SEARS) in accordance with Section 4.39 of the *Environmental Planning and Assessment Act 1979*.
3. the approval for "the purpose of an information and education facility (EIS page 7)" and not a museum as the public have been led to believe.
4. the location adjacent to the Parramatta River and the risk of flooding.
5. the lack of community consultation in the years leading up to the announcement of the chosen design and release of the EIS for comment.

The demolition of Willow Grove and St. George's Terrace

The EIS supports the demolition of Willow Grove and St. George's Terrace. The requirements for the EIS in consideration of the demolition of Willow Grove and St. George's Terrace and the wider heritage impacts of the proposed development are:

3. Built form, heritage and urban design (page 16)

The EIS shall:

- *Outline the design process which informed the proposal including justification and analysis of the benefits and impacts of the proposal and any alternative schemes considered, including any designs which could have retained Willow Grove and St George's Terrace.*

The EIS identifies the SEARS for heritage as (page 17);

6. Heritage and Archaeology (page 17)

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 EIS (at page 93) states;

It determines that proposed development necessitates the removal of two local heritage items on the site, which will have a significant impact on heritage significance and as well as the community's connection to heritage.

The Statement of Heritage Impact (SOHI) provides more detail in relation to the heritage qualities of Willow Grove and St George's Terrace where it states;

- *The demolition of the heritage items "Willow Grove (and potential archaeological site)" and the "St George's Terrace (and potential archaeological site)" located at the site would have a major physical and visual impact on heritage significance of those items. The demolition would result in the total irreversible loss of the conservation values that constitute heritage significance, including significant fabric and the visual setting. (SOHI, page 9)*
- *It is considered that some of the existing trees at the "Willow Grove (and potential archaeological site)" contribute to heritage significance. No mature trees within the established landscape of the heritage item would be retained. (SOHI, page 10)*
- *Comparative analysis concluded that the "Willow Grove (and potential archaeological site)" and the "St George's Terrace (and potential archaeological site)" are the only examples of their type located in the core of the Parramatta CBD. The demolition of these heritage items would have a major impact on the representation of these respective architectural styles in the Phillip Street streetscape and Parramatta CBD townscape. (SOHI, page 10)*

In relation to adaptive reuse, the SOHI states;

- *It is considered that no alternative schemes were considered during the design process which could have retained the "Willow Grove (and potential archaeological site)" and the "St George's Terrace (and potential archaeological site)". For further detail, refer to the Design Excellence Report 13 which addresses SEARs Issue No. 3. (SOHI, page 78)*

Despite the clearly identified heritage qualities of Willow Grove and St George's Terrace, the SOHI simply dismisses these qualities and confirms the demolition of Willow Grove and St George's Terrace in a question and answer section of SOHI by stating;

Q3 Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?

A3 Demolition would be required at this time to fulfil the vision and functional requirements of the proposal. (SOHI, page 73)

The response in the EIS and the SOHI raise a number of important and serious issues.

First, does the EIS and the SOHI fully address the SEARS for heritage?

An EIS is an independent document that identifies potential environmental impacts and mitigation measures and is used to inform development consent conditions for a particular project. It is not a document that is used to support a pre-determined outcome.

The assessment of the heritage significance of Willow Grove and St George's Terrace in the SOHI are glowing in terms of their individual heritage significance and for the Parramatta area. Given this, it is impossible to understand how it is then possible to conclude that these buildings should be demolished. There is no reasoning for this conclusion in the EIS or SOHI beyond the bland statement that *"Demolition would be required at this time to fulfil the vision and functional requirements of the proposal"*.

The token attempt to retrieve minor aspects of the clearly determined heritage qualities through the proposed mitigation measures is insulting and totally inconsistent with the acknowledged heritage significance of the buildings and only confirms the support for a pre-determined outcome.

Similarly, the adaptive reuse is given no consideration in either the EIS or SOHI. There is nothing in the EIS or SOHI that suggests that the buildings are not suitable for adaptive reuse beyond the need to demolish them to achieve a pre-determined outcome. Given the amount of café and retail activities proposed, Willow Grove and St George's Terrace would be ideally placed to accommodate some of these uses.

It is not appropriate or consistent with the SEARS to defer completely to another document. It is imperative that the authors of the EIS and the SOHI properly address the SEARS rather than blindly accept the findings of other documents.

Second, does the SOHI make conclusions that are outside its charter?

The role of the heritage consultants to the EIS, Advisian was to provide heritage input into the EIS. Given their findings on the heritage significance of Willow Grove and St George's Terrace, they have been distracted by the pre-determined outcome that provides for the demolition of the buildings. They over-stepped their role by considering matters that were beyond their charter.

The report should have concluded after making the findings on the important heritage significance of the buildings and the benefits to Parramatta in their retention. The obvious conclusion, from their findings on significance, was that the buildings should be retained.

To make the next step beyond the findings on heritage significance and recommend the demolition, not on heritage grounds, but for other reasons is a gross error.

While only a Court can declare a EIS invalid, the Parramatta Branch have been advised that the process adopted that resulted in a finding that the demolition of Willow Grove and St George's Terrace is so fundamentally flawed that such a finding of invalidity could be formed by a Court, for this reason alone.

Were alternate sites for the development that would conserve the two heritage listed items – Willow Grove and St George’s Terrace considered?

Section 1.5 of the EIS identifies SEARS for the project. The relevant requirement for considering alternate sites is:

8. Social (page 18)

The EIS shall include a social impact assessment, which:

- *considers all remaining feasible alternatives and comparatively analyses their respective social impacts and benefits*

The EIS responds to this by providing three options:

- *Option 1 – The ‘do nothing’ scenario (page 13),*
- *Option 2 – Alternative location (page 14), and*
- *Option 3 – The Powerhouse Parramatta (the project) (page 14).*

Interestingly, Option 2 of the EIS, despite its heading does not discuss a single alternate site for the project but simply goes about providing greater support for Option 3 where it states, in part:

The riverside site has been found to be the best and most appropriate location for the delivery of the Powerhouse Parramatta both at a regional and local scale and was ultimately selected as the favoured location with the NSW Government announcing its acquisition from City of Parramatta Council in April 2016.

Section 1.4 of the EIS states:

1.4 Analysis of alternatives (page 13)

Three (3) primary options have been considered in responding to the identified strategic need and objectives of the project. The options outlined below are generally aligned with those described in the Business Case Summary published by Infrastructure NSW on their website, as well as other significant research and development that has informed the proposed development.

As stated earlier, an EIS is an independent document that identifies potential environmental impacts and mitigation measures and is used to inform development consent conditions for a particular project. It is not a document that is used to support a pre-determined outcome.

There is no discussion on “adaptive reuse and measures to minimise impacts on the building” or “attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site” as required by the SEARS. The feeble attempt at mitigation works by retaining parts of the demolished buildings is tokenism at its worst because of the acknowledged significance of the buildings.

The Parramatta Branch have been advised that the process adopted that resulted in a finding that there are no suitable adaptive reuses of Willow Grove and St George's Terrace is so fundamentally flawed that a finding of invalidity of the EIS could be formed by a Court, for this reason alone.

What is the building going to be used for, as set out in the EIS?

The Overview of the project provides the following description of the uses proposed (EIS page 8-9)

- *construction of Powerhouse Parramatta, including:*
 - *front and back-of-house spaces;*
 - *seven major public presentation spaces;*
 - *studio, co-working and collaboration spaces comprising the 'Powerlab', supported by residences (serviced apartments) for artists, students, researchers and scientists, and dormitory beds for school students;*
 - *education and community spaces for staff, researchers and the Powerlab Residents, the community, and education and commercial hirers;*
 - *commercial kitchen comprising the 'Powerlab Kitchen' used for research and product development, and as a destination, education and event space;*
 - *film, photography, and postproduction studio that will connect communities with industry and content that will interpret the Powerhouse Collection;*
 - *public facing research library and archive for community, industry, students and researchers to access materials; and*
 - *a mix of retail spaces including food and drink tenancies.*

The Dictionary to *Parramatta Local Environmental Plan 2011* (the LEP) defines an "information and education facility" as:

information and education facility - means a building or place used for providing information or education to visitors, and the exhibition or display of items, and includes an art gallery, museum, library, visitor information centre and the like.

A museum is not separately defined in the LEP but is included in the uses that would fall under the definition of an "information and education facility". As a museum is not separately defined in the LEP, it would be given its ordinary meaning. For example, the Concise Oxford Dictionary defines a "museum" as:

“Building used for storing and exhibition of objects illustrating antiquities, natural history, art, etc.”

A museum is different to those other uses included in the definition of an “information and education facility”.

Based on the EIS, and if approved as an “information and education facility” the approval could allow a museum to be located on the site however, there is no obligation to do so under the terms of the EIS or the definition of an “information and education facility”.

The EIS fails to ensure the location of a museum on the site because:

1. the construction details above do not mention the word “museum”,
2. the plans indicate “display space” only which could easily relate to any other of the uses available under the definition of “information and education facility”,
3. the definition of “information and education facility” also includes the words “and the like” which could include a range of other uses not identified in the definition,
4. the absence of the word “museum” in the project description “Powerhouse Parramatta” compared to the existing “Powerhouse Museum” at Ultimo, and
5. no part of the proposed building has a designated area for a “museum”.
6. Given the recent decision of the Government to not transfer displays or exhibitions from Ultimo, then what are the “display spaces” going to be used for? Additionally, Ms Lisa Havilah stated at the Community Webinar conducted on 25 June 2020 that “there will be no permanent museum space at Parramatta”.

Flood risk

The Parramatta Powerhouse proposal locates the Moreau Kusunoki and Genton design adjacent to the Parramatta River, a river that floods with the most recent inundation occurring in February 2020.

The Draft Updated Parramatta Floodplain Risk Management Plans, February 2016 states:

“The primary source of flooding is from the Parramatta River, which expands laterally into the floodplain through the CBD area. Some areas within the CBD can also be flooded by local overland flow from intense rainfall overwhelming the drainage system . . . the flooding spreads throughout the CBD, cutting off many evacuation routes.” (page 18)

“Depths are greatest in the areas directly adjacent to the river and on the roads . . . the flood rate of rise in the Parramatta River is relatively quick . . . the average flood rate rise is 1.6 metres/hour” (page 19).

“Flooding in the Parramatta CBD is typical of flash flood catchments. Flooding arrives quickly and without significant warning times” (page 24).

The issue of placing the Powerhouse Parramatta on this site is that it would cause disruption to its operation if visitors needed to be evacuated or for school groups having to cancel visits if there is a Bureau of Meteorology warning for a severe storm.

Could the building handle a safe, orderly evacuation of elderly/disabled visitors or school groups who have arrived on foot? In the event of a medical emergency, what would happen if floodwaters blocked the access of emergency vehicles?

This riverside site is the wrong placement for the development of a museum, and the Parramatta Branch fully supports the construction of a museum on the Fleet Street (Female Factory) site.

To re-develop Parramatta's Fleet Street Heritage Precinct as part of a 30-hectare botanic and heritage public destination gives cultural authenticity for a world class museum experience. The Fleet Street site offers significant heritage buildings that could be restored and repurposed, First Nations' archaeological sites all within an enormous parkland setting. This unique development could be achieved for far less of the real cost of the 'Parramatta Powerhouse' project.

The Fleet Street institutional precinct offers a vast tract of land that does not flood and is easily accessed through transport links, the most accessible being the Parramatta Light Rail that is under construction. Alternately, the site is located 900 metres from the existing Parramatta Railway Station and 800 metres from the planned Sydney Metro West Parramatta Station.

This well-preserved Fleet Street site is a living history of how colonial and state governments addressed the needs of vulnerable women, children, and those suffering with mental illness. This penal approach to care, that was initiated in the Female Factory continued throughout the life of this site.

The Fleet Street precinct provides the ideal and accessible backdrop for a Museum of NSW dedicated to First Nations' history, colonial history, and the story of NSW.

Lack of community consultation

The Parramatta Powerhouse project originated during the administration of the City of Parramatta Council and did not allow for community consultation and an elected voice to be heard.

Interestingly, the EIS outlines that a direct engagement with the National Trust of Australia (NSW) Parramatta Regional Branch was made and this is a false statement as no direct consultation was undertaken before the EIS was released.

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Community members, in knowing that the riverside site had been chosen, voiced their concerns about the threat to Willow Grove and St George's Terrace and a subsequent petition in 2018 to retain the heritage items was signed by over 13,000 community members in two days.

In 2019, the community were given an assurance by the Premier, Gladys Berejiklian that the design brief would specify the retention of these heritage listed items, but this did not happen.

Subsequent webinars – or what was termed “*Early Consultation*” – conducted under the cover of COVID 19 and after plans were firmly in place – resulted in Infrastructure NSW and the Powerhouse appearing to dismiss any community concerns. Additionally, this computer-based consultation has limited the consultation process and resulted in the exclusion of comment from elderly community members.

The National Trust of Australia (NSW) Parramatta Regional Branch (the Parramatta Branch), like many of the New South Wales community believe that a world class museum in Parramatta is long overdue. The topic of a museum has been discussed in Parramatta since 1899 and now is the time to create a museum dedicated to Australia's origins - First Nations, convict incarceration, colonial settlement, and migration - at Parramatta.

Parramatta was the second British settlement without which the early colonisation of NSW would have failed. Additionally, Parramatta was the centre of governance for the first 70 years of colonial settlement and has a unique story that needs to be recognised and in an appropriately located permanent facility where these important stories can be told.

Parramatta needs a museum, but not the proposed Parramatta Powerhouse that will result in the demolition of two heritage listed buildings. There is no need for the demolition of these buildings when a unique heritage site is available nearby in Parramatta at the Fleet Street precinct.