

5 July 2018

The Hon. Anthony Roberts MP
Minister for Planning
GPO Box 5341
Sydney NSW 2001

Dear Minister

Sydney Football Stadium Redevelopment

I write to strongly object to the redevelopment proposal for Sydney Football Stadium and call for it to be rejected.

The proposal to demolish and rebuild the purpose-built, internationally renowned, award winning, 30-year old Sydney Football Stadium in order to upgrade facilities is absurd, has little planning merit, poor assessment information, and will result in poor public outcomes. The proposed development is unsympathetic to its environmentally sensitive location and will impact on heritage, amenity and the parklands and should be rejected.

Significant controversy surrounds the proposal with an online petition signed by over 200,000 objectors; opposition from local councils, local communities, relevant state representatives and the opposition; and an inquiry by the Public Works Committee. This warrants a slower assessment process, yet the application and works are being fast tracked.

Recently tabled papers show that the government chose Infrastructure NSW as the applicant in order to avoid delays by a possible referral to the Independent Planning Commission. Demolition is planned to commence before the detailed design is approved, despite the potential this has to extend the time the site will not have an operating stadium. The 28-day exhibition period is inadequate for community assessment for major projects with substantial reports and technical information.

The environmental Impact Statement (EIS) fails to provide adequate details on the project. It is not clear which events Sydney will miss out on if the existing stadium is refurbished rather than rebuilt or where these events would be held otherwise. There are claims that a demolition and rebuild is equivalent in cost to a refurbishment, however there is no public information identifying what refurbishment models is being compared and there is widespread community concern that only a gold plated model was considered. There is no information on whether the proportion of seating type will change, such as general admission versus members and corporate seating. These details are vital to assessing the merits of the project and should be publicly available before a determination is made.

The process taken does not represent good planning, and assessment and determination should be postponed at least until after the Public Works Committee reports on its findings.



Heritage

The existing Sydney Football Stadium was designed by eminent Australian architect Philip Cox. It was opened as part of the 1988 Bicentenary celebrations, which saw the delivery of a number of important public buildings, including buildings at Darling Harbour that were recently demolished. It would be a great shame if Sydney lost more of this significant architecture legacy.

In 2015 the National Trust listed the Sydney Football Stadium on its register and it describes the building as an “excellent example of Late Twentieth Century Structuralist style public building”. The building has received international recognition in architectural publications, won the Building of Civil Design Engineering Excellence Award from the Institute of Engineers, and was a finalist in the World Quaternario Awards in 1988.

Despite widespread and international recognition of the building’s importance, there is no independent expert assessment of its heritage values included with the EIS.

Demolition should be rejected until the NSW Heritage Council has done a thorough assessment and made recommendations for heritage status.

Sydney Football Stadium is located adjacent to numerous items and precincts of heritage significance. Moore Park is listed on the State Heritage Register and is part of the Moore Park Heritage Conservation Area which includes Sydney Girls High School and Sydney Boys High School. The site is directly across from the Paddington Urban Heritage Conservation Area and the Victoria Barracks Heritage Conservation Area. Adjacent heritage items also include the Sydney Cricket Ground Members Stand and Lady Members Stand and buildings on the former Sydney Showground site. The proposed development is big and bulky and would impose on adjacent heritage values.

Bulk and Scale

The massive increase to bulk and scale that would more than double the stadium’s height in comparison to the existing building will dominate the region and impact on heritage, residential amenity and Moore Park. Photomontages show significantly increased built form in outlooks from the Sydney Cricket Ground forecourt, Paddington and Moore Park. Appallingly, only one photomontage is provided from Moore Park – at the Anzac Obelisk – with an additional one from the Tibby Cotter Bridge. There is no indication of the increased built form to be imposed on views and outlooks from other parts of Moore Park, particularly beautiful Kippax Lake, which the new stadium would sit against. The building’s wall along Moore Park will likely have television screens that will impact severely on the peace and tranquillity of the park and Kippax Lake, which are essential to its heritage and recreational values.

The existing stadium building was designed specifically to respond to its environmentally sensitive location. The seating bowl was sunk into the ground to reduce the scale of the built structure and its visual impact. Some of the constraints with the existing building exist because it was designed to create a soft and unimposing structure that respects its heritage and parkland setting. ***The proposed building envelope fails to consider and respect its environment and aims solely to maximise stadium benefits.*** This is unacceptable.

Moore Park

Moore Park’s tranquillity, natural environment and passive recreation purpose are at risk from this proposal. Moore Park is part of Governor Macquarie’s 1811 Sydney Common Bequest, which set aside land for the outdoor recreation needs of Sydney residents. Less than a third of this bequest remains open public land and it is now more vital than ever that we protect what is left.

The parklands are facing increasing pressure from significant residential growth in surrounding suburbs which are all subject to NSW Government requirements to increase population density.

The Green Square redevelopment alone will see an extra 60,000 new residents, all living in apartments and all needing public green open space to be healthy.

With the proposed stadium moved directly adjacent to Moore Park, crowd spill will relegate the parkland to acting as an extension of the Sydney Cricket and Sport Ground whenever there are major events in the stadium.

The EIS refers to wayfinding and paths in the park. While these are not part of the development application, there is concern that there is a push to spread the stadium's footprint beyond the sporting ground's boundary, made more possible with its relocation closer to the park.

The EIS also justifies the exclusion of new car parks for the stadium because cars are currently permitted to park on the Moore Park grassed areas during events. But the Centennial Park and Moore Park Trust (CPMPT) has a long term goal supported by the community to remove on-grass parking. It is a concern that Infrastructure NSW and the Sydney Cricket and Sports Ground Trust have declared that they will "continue to liaise with the CPMPT to ensure that suitable parking and transport arrangements are put in place". When light rail is operational, if proper planning is adopted, demand for on-grass parking can reduce.

The development proposal must not rely on car parking arrangements on other land and must not be used to stop or slow the planned removal of on grass parking on Moore Park.

Screens on the building façade and large crowds walking through the parklands pose risks to the peace, tranquillity and grassed areas' integrity, which can impact on the native fauna living in the park. These will further extend the stadium impacts into the parkland.

Trees

There is inadequate information on tree and vegetation impacts, which is important given past losses of trees on this site including mature trees on the Gold Members Car Park in 2011 to make way for the National Rugby League Headquarters. The proposed development includes removal of most vegetation and 26 trees – one of which arborists have determined is a priority for retention and 14 of which are deemed worthy of consideration for retention. It is not clear whether they are being cleared to allow for the proposed demolition or to ensure the site's footprint can support various designs. This must be determined and any tree or vegetation removed purely to enable flexibility on the site must be rejected; the detailed design proposal can include applications for the tree and vegetation removal required.

The proposal states that tree replacement will be determined as part of the Stage 2 application but Stage 1 must provide a guarantee that there will be a net gain in both tree numbers and tree canopy. This is even more critical following the unnecessary and significant loss of mature trees for construction of the CBD and South East Light Rail.

Traffic

The claim that the new stadium will not impact on traffic congestion because there is no change in capacity from the existing stadium fails to acknowledge that events at Sydney Football Stadium currently cause traffic gridlock in adjacent areas and across the regional road network. This is especially bad when there is a match on the cricket grounds at the same time. Inner city residents report that it is impossible to access or leave their homes due to traffic congestion from patrons arriving and leaving the stadiums and there are longstanding problems with illegal parking during every major event.

Traffic impacts were never independently assessed when the Sydney Football Stadium was proposed because it was approved using exemptions in the *Sydney Cricket and Sports Ground Act 1978* (the Act) that allow it to proceed without an independent development assessment. Any

change to the development on the site requires a full assessment of traffic and parking impacts. It should be accepted that traffic and parking impacts under the status quo are unacceptable.

Furthermore, the EIS claims that Sydney will miss out on major events if the proposal does not go ahead and that the proposal will bring an extra 2.4 million patrons per year to the Moore Park stadiums. This is inconsistent with claims that traffic will not be affected and closer assessment of these impacts is necessary. Any increase in patrons or events under current operations would be disastrous to the traffic network and adjacent residential communities.

Assessment shows that most patrons drive to matches and more must be done to encourage the use of sustainable transport options. Parking should be restricted and a condition of consent must require integrated ticketing for all events, particularly when light rail is operational.

Additional Development

The proposal involves the demolition of the Sheridan Centre, Roosters Building, Waratahs Building, the Cricket NSW Administration Building and Indoor Wickets, and the stadium gym, pool, tennis courts, squash courts, group exercise space, spa, sauna, steam room, crèche and massage rooms. No provision is made for replacements in the redevelopment and it is unclear where these buildings and services will be accounted for in the future.

If buildings to replace these functions will be built on Sydney Cricket and Sports Ground land, their impact must be assessed as part of this application as they represent associated impacts and will likely avoid community consultation and independent expert assessment due to exemptions in the Act. If they are proposed to be relocated on other land in this precinct, this is equally alarming as it is an encroachment beyond the trust's boundaries. These changes must be made public before community comment on the proposal is due.

Amenity Protections

A cap on the number of matches held at the stadium is needed. Matches cause significant traffic and parking congestion and can alienate local parklands from public use through on grass car parking and crowd spill. I note that there have also been regular problems with violent intoxicated patrons, crowd control and anti-social behaviour including urinating in letterboxes associated with some events.

Adjacent communities should be guaranteed some respite from these impacts and not be threatened by event numbers regularly increasing without limit. The number of matches per year is expected to be 49 to 52; there is no reason not to use this estimate to establish an appropriate cap.

If there is a change in event circumstances, the trust can apply for a modification and give the community an opportunity to make submissions. Conditions of consent must also impose controls to reduce impacts from double header events at the sports ground such as caps on the number permitted per year and enforceable requirements to stagger start and end times.

Construction

As the site is in an environmentally sensitive area, demolition works have the potential to impact on the densely populated residential communities, heritage, open space, and parkland and park biodiversity. Problems could arise from construction workers parking in local streets or from noise and dust. A community consultative committee must be set up to ensure local residents, the CPMPT and affected councils are kept informed of upcoming works and can raise concerns and get action to prevent impacts.

Driver Avenue

While Infrastructure NSW and the Sydney Cricket and Sports Ground Trust have informed me that there are no plans to change the current arrangements in which Driver Avenue is only closed during events, the Minister for Sport and the Minister for Counter Terrorism have publically called

for its permanent closure and this has been supported by The Daily Telegraph in response to what they say are security concerns.

Permanent closure of Driver Avenue would have significant unacceptable impacts because it would block many residents' access to their homes and film and set building businesses' access to Fox Studios. Any new stadium must include adequate security measures that prevent any perceived need to permanently close Driver Avenue. The Department of Planning and Environment must not approve the redevelopment unless it can guarantee adequate internal security measures within the sporting ground's boundaries.

The Sydney Cricket and Sports Ground Trust has a long history of showing contempt for the parklands, the local residential community and heritage.

The community stopped its attempts to build a stadium on, and a car park both under and on Moore Park. The Tibby Cotter Bridge removed significant parts of Moore Park land to provide stadium patrons another option to cross Anzac Parade when going to matches and there is much speculation that it was part of a plan for a car park on Moore Park west. Development on the trust's land has occurred without community consultation and affected communities have historically only found out about a building when construction starts. The proposed development has no planning merit and represents empire building at the expense of public benefit; I ask that you reject it.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AG', written in a cursive style.

Alex Greenwich

Member for Sydney

CC: Department of Planning and Environment