

From: [REDACTED]

Sent: Tuesday, 6 August 2019 8:19 AM

To: DPE CSE Information Planning Mailbox <information@planning.nsw.gov.au>

Subject: Adaptive reuse of the Royal Hall of Industries

Dear Department,

I wish to make a submission on the ADAPTIVE RE-USE OF THE ROYAL HALL OF INDUSTRIES. I am unable to do so via the Planning Portal because it just feeds me “thank you for your submission” when I haven’t made one. Please rectify.

My submission is below, please acknowledged receipt.

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Adaptive reuse of the Royal Hall of Industries

The SEARs have two specific requirements regarding land use impacts. One relates to statutory planning provisions for the site and the other to the Burra Charter concerning adaptive re-use. The EIS is inadequate and misleading on both matters.

Statutory planning

The EIS relies on clause 18 of ISEPP to establish the permissibility of the proposal. The aim of ISEPP is to facilitate the effective delivery of infrastructure across the State. However, the proposal falls outside the definition of infrastructure in ISEPP. Moreover, ISEPP does not have precedence over SEPP 47, which states:

In the event of an inconsistency between this Policy and another environmental planning instrument, whether made before or after this Policy, this Policy prevails to the extent of the inconsistency.

Moreover, in 2009 the then Department of Planning stated:

The clause 18 provisions for State land are an interim measure that will only apply until new principal local environmental plans (i.e. standard LEPs) are in place, which apply to the site.

The EIS devotes much text to the power of the Minister to approve the proposal come what may. However true that may be, the SEARs require an examination of land use so that the Minister can make an informed decision.

According to the Sydney Swans 2018 Annual Report, the Royal Hall of Industries is to be the headquarters of the Club. However, the EIS prefers the euphemism “home”. It plays down the office

use, which accounts for a large portion of the floor space. It does not explain how the large office use can be compatible with adjoining land uses.

In September 1999, following a \$27 million refurbishment, the then Premier, Mr Bob Carr, re-opened the Hordern Pavilion and Royal Hall of Industries. The government handed over both buildings to the Centennial Park and Moore Park Trust (CPMPT) in 1997 on the basis that they were to be preserved as entertainment venues for public use (CPMPT Annual Report 2007/08). Moreover, the proposed uses are well outside what SEPP47 permits.

The EIS also implies that facilities exclusively for professional sportsmen are recreation facilities. That is nonsense.

Adaptive re-use

According to the Burra Charter:

Adaptation is acceptable only where the adaptation has minimal impact on the cultural significance of the place.

It is very clear from the EIS that the impact of the proposed uses on the cultural significance of the place would not be minimal.

Conclusion

The purpose of SEARs is to allow the Secretary to direct the applicant to specific matters to be addressed in the environmental impact statement. This promotes good decision-making as it allows the decision-maker, in this case the Minister or his delegate, to have all the material before him, and to make an informed assessment. The Minister cannot make an informed assessment if the EIS is defective.

Nevertheless, if the Minister is inclined to approve the proposal then he should at least require a better alignment of the proposal with statutory planning and the Burra Charter. The head-office and other private uses should go, and additional public use facilities substituted so that public uses predominate.