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Ms Carolyn McNally
Secretary
NSW Department of Planning and Environment
320 Pitt Street
Sydney
NSW 2000

Dear Carolyn ,

REQUEST FOR ENVIRONMENTAL ASSESSMENT REQUIREMENTS - ROYAL HALL OF INDUSTRIES, MOORE PARK

We write on behalf of Sydney Swans (the Proponent) requesting that the Secretary issues Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) to accompany a State Significant Development (SSD) application for the proposed development of at the Royal Hall of Industries in Moore Park.

Pursuant to Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD), development on land within Fox Studios, Moore Park Showgrounds and Sydney Sports Stadium Site on the State Significant Development Sites Map, is identified as being State Significant Development (SSD) if:

- (a) *it has a capital investment value of more than \$10 million, or*
- (b) *it is for the purposes of an event that is not a sporting event on land described in Part 1 of Schedule 2 to the Sydney Cricket and Sports Ground Act 1978.*

In this circumstance, the proposal will have a capital investment value (CIV) of approximately \$43 million, meaning that the project is classified as SSD.

The purpose of this letter is therefore to request SEARs for the preparation of an EIS for the proposed development. To support the request for the SEARs this letter provides the following:

- A description of the site;
- An overview of the proposed development;
- The strategic and statutory planning context;
- The key likely environmental and planning issues associated with the proposal; and
- The expected consultation to be undertaken by DPE.

THE SITE

The site is located at No.1 Driver Avenue in Moore Park, and is located on the south-western edge of the Moore Park Showground with further frontages to Lang Road and Errol Flynn Boulevard.

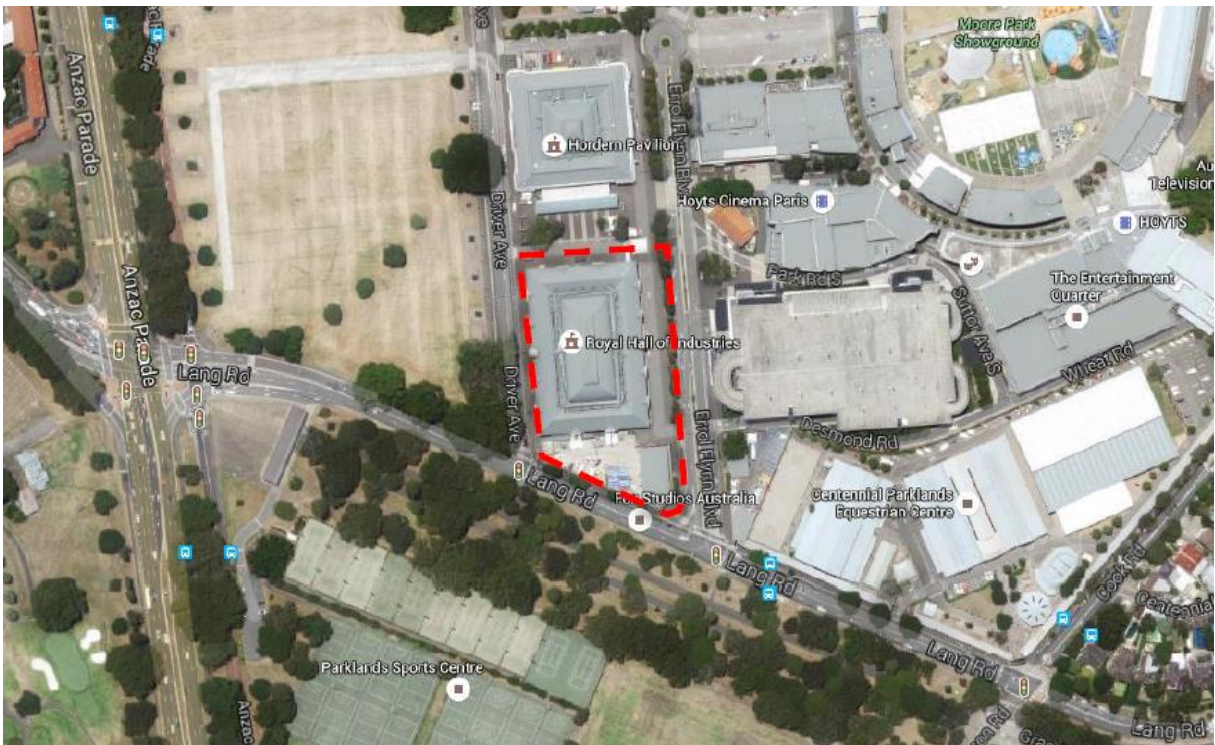
The site contains the Royal Hall of Industries (RHI) and associated service yard immediately to the south of the building. The RHI has in recent times been utilised as an exhibition space, operated on a lease from the Centennial Park and Moore Park Trust.

The RHI building has a rectilinear plan form with symmetrically placed entrances on all four sides, four to the east and west, and two to each of the north and south facades. The building has a gross floor area of approximately 5,700sqm at ground level with basement toilets at the southern end of the building.

The legal description of the site is Lot 3, DP861843 and Lot 52, DP1041134. The site is depicted in Figure 1 below and extends to approximately 1.9ha (source: *RPData*).

The RHI is located to the south of the Hordern Pavilion which operates as a live music and entertainment venue, with associated pedestrianised forecourt area which separates it from the RHI. Other nearby venues include the Sydney Cricket Ground, the Entertainment Quarter and the Sydney Football Stadium. The site is also located some 1.5km to the south east of Sydney Central Station.

Figure 1 – Aerial Site Image



Source: *Nearmaps.com.au*

OVERVIEW OF THE PROPOSED DEVELOPMENT

The SSD application will seek to bring forward an adaptive reuse of the building to provide a new High-Performance Sport and Community Facility, comprising the following uses:

- Home of the Sydney Swans and NSW Swifts
- Multi-purpose indoor facility available for community use and public events such as junior club nights, school graduations and other functions.
- An indoor netball court for the NSW Swifts Netball Team and netball community
- Facilities for a Swans team in the AFL National women's competition
- Player change areas, lockers and wet areas;
- Wet recovery – pool and hot/cold hydrotherapy;
- Go Foundation and Clontarf Foundation for indigenous education;
- Australian Red Cross Blood Service Donation Centre;
- Medical, rehabilitation and sport science areas;
- Gymnasium, museum, media centre and auditorium
- Back of house offices and café/canteen;
- Entry foyer and retail/shop units;
- Plant and store rooms; and
- Sydney Swans Academy.

It is noted that the nearby Hordern Pavilion and forecourt area to the north of the site are also proposed for renovation works. However, those works do not form part of this current proposal for which SEARs are requested.

STATUTORY AND STRATEGIC CONTEXT

The site is located within the Moore Park Showground. As such the relevant Acts, environmental planning instruments and development controls relating to the site and relevant to considerations for the SSD application are as follows:

- *Environmental Planning and Assessment Act 1979;*
- *SEPP (State and Regional Development) 2011; and*
- *SEPP 47 (Moore Park Showground).*

Each of the above are described further below in terms of their relevance to the subject site and the proposed development.

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT

In accordance with Section 4.38(3) of the *Environmental Planning and Assessment Act 1979*, an SSD application can be prepared to seek development consent for partly prohibited development at the site. The Proponent has received legal advice from Adrian Galasso SC which indicates that the proposed use of the subject site for a High-Performance Sport and Community Facility is not wholly prohibited, given the 'public events' component under SEPP 47 (see below) and the 'recreation facility (indoor)' which is permissible through the function of the *State Environmental Planning Policy (Infrastructure) 2007*. As such the proposal can be progressed through an SSD application.

SEPP (STATE AND REGIONAL DEVELOPMENT) 2011

The State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD) establishes the consent authority for certain development of state and regional planning significance. Clause 2 of Schedule 7 of the SEPP SRD sets out the types of development at Fox Studios, Moore Park and the Sydney Sports Stadium Site, which are State Significant Development (SSD). Development with a Capital Investment Value of more than \$10 million within this location is SSD. The Minister for Planning is the consent authority for SSD.

SEPP 47 (MOORE PARK SHOWGROUND)

The State Environmental Planning Policy No.47 – Moore Park Showground (SEPP 47) regulates the land uses that can occur within the Moore Park Showground Precinct, however there are no built form controls contained in this SEPP which are relevant to the site.

SEPP 47 identifies two areas of land within Moore Park Showground, these being land 'diagonally hatched' and land 'vertically hatched'. These lands are illustrated on the SEPP 47 Map and suggests that the subject site is principally located on the 'vertically hatched' land (Lot 3, DP861843), with a small element in the south eastern corner of the site on the 'diagonally hatched' land (Lot 52, DP1041134), with the remainder of that Lot encompassing the wider part of Moore Park Showground. The SEPP contains land use tables relating to both the vertically and diagonally hatched land.

SEPP 47 identifies a range of permissible uses on the main RHI site (Lot 3, DP861843) including 'public events'. Whilst on the south eastern corner of the site (Lot 52, DP1041134) a wider range of uses are permissible including 'commercial premises' and 'shops'. Therefore, as explained above it is considered that the proposal can be progressed through a SSD application.

OTHER RELEVANT POLICIES AND MANAGEMENT PLANS

In addition to the above statutory provisions, the following relevant planning, goals and strategic planning objectives will be addressed:

- Heritage Act 1977;
- NSW State Priorities;

- A Metropolis of Three Cities – The Greater Sydney Region Plan 2018;
- Central City District Plan 2018;
- Future Transport 2056 Strategy;
- Heritage Conservation Strategy for Moore Park Showground 1995;
- Centennial Parklands Conservation Management Plan 2003 - 2010;
- Centennial Parklands and Moore Park Trust Plan of Management 2010-2016;
- Centennial Parklands Plan of Management 2018 and beyond; and
- Moore Park Master Plan 2040.

KEY MATTERS FOR CONSIDERATION

The Site has been selected to accommodate the new high-performance sport and community facility given its location adjacent to the home ground of the Sydney Swans at the Sydney Cricket Ground (SCG). The current training and administration headquarters are located at the SCG, however the space at the SCG is limited and the club is looking to upgrade their facilities and community footprint. The club have identified the RHI as a suitable option for developing this new facility given its size, configuration and location and its capacity to accommodate the NSW Swifts.

The Sydney Swans are long term tenants of Moore Park and recently renewed their agreement to play home matches and train at the SCG for the next 30 years.

It is considered that the proposed development will give rise to significant benefits including a new accessible high-performance sport facility, new flexible spaces to host public events for the local community and will provide office space for charitable foundations and a Red Cross Blood Donor Service, the only one in Sydney's Eastern Suburbs.

The key environmental planning issues that are proposed to be addressed in the EIS are outlined below to assist the Department and the Secretary in identifying the Environmental Assessment Requirements for the proposal.

The key environment planning considerations relevant to the proposal are as follows:

- Design and Built Form;
- Heritage;
- Transport and Accessibility; and
- Construction and Operational Management.

Each of these matters are summarised in brief below.

Design and Built Form

The design of the proposed development will need to be sensitively considered given the heritage value of the RHI building. At this stage limited external works are proposed to the RHI, other than the following:



- Some of the existing glazing is due to be replaced with transparent safety glass;
- Proposed modifications to the existing doorway infills;
- Removal of existing plant and reinstatement of heritage façade;
- Modifications to courtyard wall as part of a boundary adjustment on Errol Flynn Boulevard;
- Proposed extension to building connecting the southern façade.

There is also proposed to be additional built form developed in the existing service yard to the south of the RHI to accommodate a new indoor netball court and associated offices, along with commercial premises in the south eastern corner of the site.

When fully resolved, the design of the proposal will be identified on the architectural plans to be lodged with the SDD application. However, preliminary scheme plans are provided at Appendix A as part of this request for SEARs.

Heritage

The Royal Hall of Industries building is not separately listed on the State Heritage Register. It is however listed on the State Heritage Register as part of the Centennial Parklands comprising Centennial Park, Moore Park and Queens Park (Listing No. 01384; Gazetted 27 Mar 2000; Gazette No.39, p.2389).

Given the heritage listing of the building a Heritage Assessment will be provided with the SSD application, whilst initial heritage advice on the acceptability of the proposal, and in principle support for the preliminary scheme, has been received from the Urbis Heritage Team. The EIS will seek to demonstrate that there will be limited harmful impacts upon the heritage value of the RHI and the scheme will respect the iconic status of the RHI building. It is expected that the SSD application will also be accompanied by a Heritage Impact Statement.

Transport and Accessibility

The impact of the traffic generated by the development on the existing and future public transport infrastructure will be assessed in a Traffic and Access Report. An assessment will be made of the delivery and service vehicle movements and circulation. The EIS will demonstrate the provision and arrangement on-site, nearby car parking, bicycle accessibility and the availability of public transport will be acceptable. It is expected that a Transport and Accessibility Report will be lodged with the SSD application.

Construction and Operational Management

A Preliminary Construction and Environmental Management Plan will detail the traffic, transport and road safety impacts during any construction and how these impacts will be mitigated and or controlled. Further measures to minimise potential noise and vibration impacts will be incorporated into the plan. Measures and procedures will be identified to minimise and manage the generation and off-site transmission of sediment, dust and fine particles.

A Preliminary Operational Management Plan will be prepared to identify the way in which the new training, administration and community facility will operate. This will detail how any impacts of the operation of the site will be mitigated and or controlled.



Ultimately, it is anticipated that any negative impacts of the proposal will be suitably addressed through the design of the proposal or otherwise mitigated as part of the project evolution.

CONSULTATION

The Sydney Swans have already undertaken extensive dialogue with the NSW Government, Federal Government and the Centennial Park and Moore Park Trust. Other organisations have also been consulted including the City of Sydney, Saving Moore Park, the National Trust of NSW, the Sydney Cricket Ground Trust and Carsingha (the Entertainment Quarter Consortium).

During the assessment of the SSD application, we would expect that the Department of Planning and Environment would consult with the following relevant bodies:

- Centennial Park and Moore Park Trust;
- Office of Environmental Heritage;
- City of Sydney Council;
- Roads and Maritime Services;
- Service providers;
- Any relevant local community bodies.

CONCLUSION

The purpose of this letter is to request the SEARs for the preparation of an EIS for the adaptive re-use of the Royal Hall of Industries at 1 Driver Avenue, Moore Park to provide a new high-performance sport and community facility for the Sydney Swans, NSW Swifts and wider community. It includes a description of the site, an overview of the proposed development, and an outline of what are considered to be the key issues for the assessment of the SSD Application.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the Environmental Assessment Requirements to guide the preparation of the EIS. Should you have any queries about this matter, please do not hesitate to contact me on 02 8233 9901.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Nik Wheeler", with a long, sweeping flourish extending to the right.

Nik Wheeler
Associate Director
Encs

- Appendix A – Preliminary Scheme Plans
- Appendix B – CIV Letter