

Sydney Football Stadium Redevelopment - Submission from Community Representatives of the CCC

Ms Karen Harragon
Director, Social and Infrastructure Assessments
Email: Karen.Harragon@planning.nsw.gov.au

Dear Ms Harragon,

Sydney Football Stadium Community Consultative Committee - Late Submission to Modification

Thank you for the opportunity for the Sydney Football Stadium Redevelopment Community Consultative Committee (CCC) to request that you accept this late submission. This, if accepted, is a submission to the following modifications:

- SSD 9249 Modification 6 - Inclusion of Precinct Village and Carpark Envelope
- SSD 9835 Modification 7 - Precinct Village and Car Park

As the independent Chairperson, I am making this submission at the request and on behalf of the community representatives of the CCC to state their concerns (Community Representatives).

As per Section 3.2 of "Community Consultative Committee Guideline State Significant Projects 2019" the independent Chairperson is "a convenor, facilitator, mediator and advisor for the committee", "independent and impartial" and "the key contact between the committee and the Department". It is in this capacity that I make this submission on behalf of the Community Representatives.

It represents the views of seven Community Representatives and the City of Sydney representative of the CCC (a total of eight CCC members).

Other members of this CCC are two representatives of the proponent, representatives of Waverley and Randwick Council and a representative of the Alliance of Moore Park Sports (AMPS). The names of members of the committee and views of the AMPS representative forms attachment one to this submission.

In summary, the concern of the Community Representatives relates to continued provision of Event Parking (EP) on three areas of the Parkland making them unusable as public space - (EP1 is no longer used, EP2 is the area north Kippax Lake and EP3 is opposite the Royal Hall of Industries and Hordern Pavilion). In addition, the concern is the apparent lack of commitment to initiatives beyond private car use. These are key concerns in addition to the range of community amenity and safety impacts that are likely to result from the parking and associated impacts. The Community Representatives are seeking consideration of the matters outlined below in assessment of the modifications.

Process leading to this as a late submission

The Conditions of Consent require the applicant (Venues NSW) to consult with the CCC on project modifications. The Community Representatives of the CCC feel they were misled in this consultation process.

The series of events leading to this submission are as follows

- **24 August 2021- CCC meeting convened to discuss the various SFS Operational Management Plans** (the Condition of Consent also requires consultation with the CCC on these plans)
Venues NSW added a late agenda item to this meeting under the heading of "transport initiative (subterranean car park)" recorded as item 8. (Meeting notes

SFS CCC Submission February 2022 to

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<https://www.infrastructure.nsw.gov.au/media/3136/sfs-ccc-meeting-minutes-24-august-2021.pdf>.

This discussion, the first that the CCC knew of this proposal, was prefaced with background as recorded in the meeting notes that are a summary of the discussion. Julie Shires, Group General Manager Infrastructure Development, of Venues NSW is recorded as indicating that there had been “Review of feedback provided by the CCC over time, with parking the single most contested issue, with a focus on the need to remove parking off the grass” and “The proposed development is a joint initiative between Venues NSW and Greater Sydney Parklands honouring the commitment to remove parking from the grasslands”. This consultation was to meet requirements under the Condition of Consent for the SFS. The Community Representatives and CCC members generally were told this “transport initiative” was in direct response to the identified problem of parking on public space. Additional feedback to Venues NSW as part of the modification consultation was invited to be submitted by CCC members prior to 7 September 2021. Written feedback to Venues NSW from most Community Representatives had reservations but on the whole supported the project on the understanding it would result in the ending of parking on public grasslands.

- **20 September 2021 - Minister Stokes media release**
<https://www.planning.nsw.gov.au/News/2021/Moore-parkland-for-people-as-cars-moved-off-the-grass> This linked the announcement of the car park to “creating more open space” and the article concludes with “Once the car park is fully operational, all remaining on-grass parking will be removed from Moore Park.” The Minister’s Media Release links this decision to the timing of completion of the final stage of the car park project: “The second stage will be complete in 2023”.
- **13 October 2021 - CCC regular meeting**
Julie Shires presented item 8 “Update on Progress of the Modification Application (Village Precinct and Car Park)” supported by input from Stephanie Ballango, Planning Consultant - Savills. Meeting notes are <https://www.infrastructure.nsw.gov.au/media/3191/sfs-ccc-meeting-minutes-13-october-2021.pdf> The meeting discussion reflected the understanding that development of the car park was predicated on the removal of car parking on all public parklands. Julie Shires representing Venues NSW is recorded, as part of the summary of discussion in the meeting notes, as having “Clarified the overall decrease in parking numbers, with the 540 spaces in the SFS and 1,000 in EP2 effectively going into the new carpark, but with complete removal of EP3 (not a relocation)” (page 8 of the meeting notes). This discussion, following the Minister’s media release, left the Community Representatives in no doubt that all areas of the parklands would be safely restored for community use.
- **24 November 2021 - closing date for submission on Modification 6 and 7.**
- **27 January 2022** – The NSW Upper House Hearings into submissions into the 2021 Greater Parklands Bill. The submission from Venues NSW made no mention of its commitment to the CCC that removal of parking from Moore Park would eventuate with the opening of the new SFS carpark. The submission states “Removal of all on-grass parking from 31 December 2023, without the provision of like-for-like carparking alternative, will leave the Moore Park precinct with 1,100 fewer carparking spaces and create a significant barrier to access for many NSW residents.” The submission does not mention Approval Conditions requiring them to develop a Green Travel Plan and Event Carparking Management Plan. Both of these are designed to provide alternatives to car travel and options for satellite park-and-ride sites.
- **9 January 2022 SMH article** - <https://www.smh.com.au/national/nsw/fears-new-car-park-next-to-stadium-won-t-guarantee-end-to-on-field-parking-20211222-p59jl9.html#comments> - City of Sydney questioned that the removal of parking on parklands would not be enforceable.
- **26 January 2022 SMH article** - <https://www.smh.com.au/politics/nsw/david-and-goliath-big-business-sport-to-fight-limits-on-moore-park-development-20220126-p59re5.html> - outlined objections from a range of sporting bodies and stated “Venues NSW, an agency responsible for stadia, has argued that removing all on-grass parking from late 2023 will leave the Moore Park precinct with 1,100 fewer car parking spaces during events, and disadvantage residents from Sydney’s south and west.”

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- **27 January 2022 - CCC regular meeting**

Discussion of the media communications dated 9 and 26 January 2022, and the submissions to, and inquiries by, the Select Committee on the *Greater Sydney Parklands Trust Bill 2021* regarding an intention by Venues NSW to continue to seek parking on Moore Park. This submission is a direct result of the discussion at that meeting. (NB: *Meeting notes have not been provided as they are subject to approval by the members and are published 2 weeks from the date of the meeting*).

Position of the Community Representatives in relation to the proposed Modifications

While the CCC did not make a submission in response to exhibition of both modifications, the Community Representatives believe they gave implied support for the car park modification as expressed through feedback provided at meetings, the meeting notes and in the information requested and provided directly to Venues NSW. Their support for the proposal and additional parking was because the consultation process by Venues NSW advocated for it on the promise of removal of car parking on the parkland on the completion of the car park the subject of the modification. The Community Representatives now feel misled, and lured into a false sense of security, about the proposal.

They feel that had Venues NSW made it clear that the modifications would not lead to cessation of car parking on public space by December 2023 they, and the community groups they represent, may have formed a different view on supporting this proposal.

The Community Representatives are responding to what appears to be:

- Venues NSW's revised position to oppose the decision by Minister Stokes to remove all parking on Moore Park public parklands to coincide with the opening of the carpark proposed under Modification 6 to SSD 9249 and Modification 7 to SSD 9835; and
- the position of the Alliance of Moore Park Sports and other commercial interests associated with the SFS, SCG & EQ to not fix an end date for removal of all parking in Moore Park with the matter apparently left open for some future unspecified date (perhaps never).

The CCC understands that the event parking (EP) areas for the stadium are not within the parcel of land being assessed as part of this proposal but the link with these areas was made as part of the Venues NSW consultation on this car park and as part of the Transport Assessment (Appendix H) prepared to support the Environmental Impact Statement that addressed Precinct Parking (refer to Section 6.6.2). The latter states that: "...providing no additional car parking as part of the development proposal complements the strategy of promoting public transport, walking and cycling to access the stadium and reducing the reliance on private vehicles." See also the further statements at Section 6.6.2 confirming sufficient capacity in the transport network should parking not be available on the existing sites of EP2 and EP3: "the analysis confirms that there would be sufficient capacity to accommodate the changed parking arrangements".

The Community Representatives continue to appeal to the manager of this public land, the Greater Sydney Parklands (Greater Sydney Parklands Trust). The Chief Executive has a standing invitation to attend CCC meetings and the CCC will continue to communicate with the Trust. Community Representatives argue that the restoration of this land to public use is consistent with the 2016 Moore Park Masterplan and is vital to the objectives of Greater Sydney Parklands that include "to develop new ways to involve Sydneysiders in meeting local community needs, and to expand and improve public green space and parklands, to reinforce Sydney's global reputation as a "City in a Park"." (DPIE website Premier's Priorities - Greater Sydney Parkland 2022).

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Community Representatives are left uncertain about the level of commitment of Venues NSW to the Green Travel Plan and Event Carparking Management Plan from discussions on this topic in CCC meetings and its failure to mention them in external representations including in its submission on the Sydney Parklands Trust Bill 2021. So far, the CCC has received no evidence of any promotion of the initiatives suggested in a Green Travel Plan. The CCC Representatives are keen to support a range of transport modes and transport links to and from the precinct beyond private vehicles to ensure the stadium development is a success consistent with the environmental credentials they understood the stadium to be pursuing.

The Community Representatives are mindful of a range of community impacts that will result from the continuation of parking on the grasslands, the net increase in cars entering the precinct, and the consequences of potentially inadequate implementation of a Green Travel Plan and Event Car Parking Management Plan. That is the additional safety, traffic, loss of amenity and noise impacts that will come with operation of the SFS. The CCC Representatives note that despite the universally recognised importance of open space for communities during the Covid lockdowns in 2020/21, the lessons have been ignored by Venues NSW with its decision to continue to seek parking on public grasslands.

In summary, the Community Representatives are concerned that if the position of AMPS and commercial interests were to be accepted by the NSW Government and the car park approved and built, there would be no decrease in car parking spaces available on event days. This would make a mockery of the intention of the forthcoming Green Travel and Event Parking Management plans (Consent Conditions D14 and D50 respectively). Both plans are supposed to result in better use of public transport and reduced reliance on private vehicle parking, thereby removing the need for parking on Moore Park.

The Community Representatives calls on the Department to factor in the failure to address the needs of the public for quality parklands, free of cars, when assessing the merits of the Modification proposal.

The Community Representatives regret the need to withdraw support for the proposed new carpark. This position stands until either the basis upon which the Committee Representatives gave their original endorsement is restored, or there is another resolution which permanently and enforceably brings to an end parking on EP2 and EP3 on terms satisfactory to the Community Representatives.

Note that the Community Representatives will also be seeking to make a late submission to the Select Committee on the *Greater Sydney Parklands Trust Bill 2021*.

Yours sincerely



Margaret Harvie
Chairperson
Sydney Football Stadium Redevelopment Community Consultative Committee
on behalf of the Community Representatives

Attachment 1 - *Membership of the Committee and separate statement by the representative of Alliance of Moore Park Sports (AMPS)*

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Attachment 1 - Membership of the Committee and separate statement by the representative of Alliance of Moore Park Sports (AMPS)

Community representatives:

- **Vivienne Skinner***
- **Chelsea Ford***
- **Sofie Mason-Jones***
- **Julie Osborne***
- **Robert Postema***
- **Linda Gosling - Paddington Society Representative***
- **Steve Rankine***
- Alliance of Moore Park Sports (AMPS): Tom Harley.

Chairperson: Margaret Harvie. **Note taker:** Leanne Smith, Governance House Pty Ltd

Local Government representatives:

- Mayor Paula Masselos (Waverly Council),
- Mayor Cr Dylan Parker (Randwick City Council),
- **Andrew Rees, Manager Major Projects (City of Sydney)***

Sydney Football Stadium Representatives:

- Peter Hynd, SFS Project Director, Infrastructure NSW;
- Julie Shires, Group General Manager Infrastructure Development, Venues NSW

**Asterix indicates those supporting the statement*

Regular Guests to CCC meetings:

- Department of Planning & Environment - Shiraz Ahmed, Team Leader - Infrastructure Management.
- John Holland - Paul Cassels, Project Director and Tiffany Jones, Communications Manager;
- INSW - Vlad Popovski, Senior Communication Officer;
- Greater Sydney Parklands – Suellen Fitzgerald, Chief Executive

Separate statement

Tom Harley (AMPS Representative) abstained from the above statement and tabled the views of AMPS in relation to the timing of removal of parking on the parklands and provision of a viable alternative solution.

He further indicates that as a member of the CCC representing AMPS he has:

- reinforced AMPS commitment to the Moore Park 2040 Master Plan and the removal of all on grass parking on Moore Park
- supported Venue NSW's proposal for the community precinct and subterranean carpark and agreement to remove all on grass parking on EP2 once the carpark is complete and operating.

AMPS have committed to remove all on grass parking from EP3 once a mutually agreed process, timeline and solution(s) are agreed and approved by all key stakeholders (AMPS, Government, Transport for NSW, NSW Police, Greater Sydney Parklands, the Entertainment Quarter and the local community).

AMPS submission to the Select Committee inquiry into the *Greater Sydney Parklands Trust Bill 2021* and that of the individual codes and clubs lodged submissions was on the basis of the lack of formal consultation or agreement on a deadline date to remove on grass parking from EP3 prior to this Bill.

The position of other Committee Members and guests will be recorded in the relevant public meeting notes.

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