

15 February 2022

Ref: DPIE Feb 2022

Mr Michael Cassel
Secretary
NSW Department of Planning and Environment
12 Darcy Street
PARRAMATTA 2150

Attn: Ferdinando Macri – Planning Officer

Dear Mr Macri

I write to you regarding the decision of the Sydney Football Stadium Development's Community Consultative Committee (CCC) to withdraw their support for SSD 9835 MOD 7 relating to the Precinct Village and Car Park development ('MOD 7').

The CCC members' concerns primarily relate to the removal of on-grass parking on EP3 in the south of Moore Park East. There is a misapprehension held by the CCC that on-grass parking will remain a permanent fixture in the Moore Park Precinct.

Venues NSW expressly denies the CCC's claims. During all consultation and engagement activities, Venues NSW in partnership with Greater Sydney Parklands, has consistently articulated that the Precinct Village and Car Park development would facilitate:

- immediate removal of the northern portion of the EP2 (Upper Kippax) on-grass parking area via a condition of consent on MOD 7;
- removal of the southern portion of the EP2 (Lower Kippax) on-grass parking area when Stage 2 of the Precinct Village and Car Park is operational via a condition of consent; and
- progressive removal of EP3 (Showground) on grass parking by Greater Sydney Parklands in consultation with Venues NSW, Transport for NSW and Moore Park Events Operations Group (MEOG), pending successful development and implementation of precinct-wide transport initiatives.

It is important to also highlight that throughout all briefings, consultation processes and lodgement of MOD 7, neither Venues NSW nor Greater Sydney Parklands have committed to a specific date by which on grass parking on EP2 (Upper and Lower Kippax) or indeed EP3 (Showground) would be removed. The cessation of on grass parking in EP2 North (Upper Kippax) would only be realised upon the approval of MOD 7, with parking on EP2 South (Lower Kippax) ceasing once the MOD 7 development is operational.

The CCC's submission also suggests that consultation has been disingenuous. Venues NSW wishes to draw the Department's attention to the collegiate and transparent consultation it has undertaken with the CCC in the preparation of MOD 7 and the four (4) transport operational management plans it is required to prepare under SSD 9835. Venues NSW first briefed the CCC on 24 August 2021 on the Precinct Village and Car Park development, which represented the earliest opportunity to engage with the CCC following Government's approval to proceed with the project.

From the outset, Venues NSW advised CCC members that MOD 7 would facilitate the removal of on-grass carparking on EP2 (Upper and Lower Kippax as described above) and removal of carparking from EP3 (Showground) was contingent on the successful implementation of transport initiatives by others throughout the Moore Park Precinct. This is evidenced in the CCC meeting notes recorded by the independent chair dated 24 August 2021 (Item 8) and 13 October 2021 (Item 9). The CCC was provided with copies of the briefing material presented in the meetings and provided with two (2) weeks to provide additional written feedback for consideration during the finalisation of MOD 7. The CCC was also given advanced notice of MOD 7's exhibition commencing and forwarded a link to the Department's website at the commencement of the exhibition period. The outcomes from this consultation process are summarised in the MOD 7 documentation currently being assessed by the Department.

As the Department is aware, SSD 9835 requires the preparation of four (4) transport management plans prior to the Stadium's commencement – a Green Travel Plan (Condition D14), Event Traffic and Transport Management Plan (Condition D16), Passenger Pick Up and Drop Off Facilities Plan (Condition D18) and Event Car Parking Management Plan (Condition D50). Of these, only the Event Car Parking Management Plan is required to be prepared in consultation with the CCC. Notwithstanding this, Venues NSW (and its consultants) invested substantial time during the preparation of all four (4) plans in briefing the CCC on multiple occasions (29 July 2021, 24 August 2021, and 13 October 2021), issuing members with complete final drafts of all four plans and providing the CCC with two (2) weeks to provide feedback, which was considered in the finalisation of the plans. Importantly the catalytic benefits of MOD 7 supporting the removal of on grass parking only from EP2 (Upper and Lower Kippax) is articulated in all four plans which were reviewed by the CCC.

The plans also make clear that on grass parking from EP3 (Showground) will be progressively removed by Greater Sydney Parklands in consultation with Venues NSW, Transport for NSW and Moore Park Events Operations Group (MEOG) pending successful development and implementation of precinct-wide transport initiatives. By briefing the CCC on multiple occasions and seeking feedback from the CCC on all four (4) draft transport management plans rather than the single plan as mandated by SSD 9835, Venues NSW exceeded its statutory obligations in order to engage effectively and transparently with the CCC.

Venues NSW emphasises our position has not changed since details of the Village Precinct and Car Park development were first shared with the CCC, and as detailed in MOD 7. We recognise the value of green space and public domain surrounding the Moore Park Precinct and its benefit, not only on the fan experience but also for the community at large. It is for this very reason that Venues NSW has championed and is directly investing in the proposed Precinct Village and Car Park development to enable the removal of on-grass car parking whilst also enhancing the development to provide a vibrant community space.

The Precinct Village and Car Park development continues Venues NSW's proven track record of historically facilitating the removal of on-grass parking from Moore Park and turning the space into community green space. The former SCG Trust funded the construction of the Sydney Swans and Sydney Roosters training fields at Moore Park East, thereby removing thousands of parking spots used by visitors to the precinct. Prior to being developed as a shared community and elite training field.

We seek to do the same again by directly funding a multi-level underground carpark on Venues NSW land to allow for the removal of a further 1,000 parking spots from the northern part of Moore Park East (EP2 Upper Kippax). Venues NSW has championed and is directly investing in the Precinct Village and Car Park development to respond to the requirements of SSD 9835 which require consideration of alternative options.

Following extensive review of other potential options, the Precinct Village and Car Park development was identified as the only viable solution providing an ability to accelerate the removal of the on-grass car parking in a meaningful way. In this regard, the project supports the commitment given in the SFS Redevelopment Environmental Impact Statement approved by the Minister for Planning and Public Spaces which states: *"removal should occur over the medium and long-term and will only occur where increased access via other transport modes and/or additional car parking is provided in alternative locations"*.

The Precinct Village and Car Park development also supports realisation of the Moore Park Masterplan 2040 which commits to *"progressively removing parking on green space, noting that such measures will not be implemented until supplementary parking in dispersed locations (such as the Entertainment Quarter, E.S. Marks Athletics Field, Moore Park Golf and the SCG) has been created. This will ensure there is no net loss of event related parking in the Precinct"*. The Precinct Village and Car Park development is also consistent with a key opportunity identified by the Masterplan to *'support the provision of increased on-site car parking on adjacent land managed by the Sydney Cricket and Sports Ground Trust'* (now Venues NSW).

Approval of MOD 7 is however time critical given the land on which the Precinct Village and Car Park is contemplated is adjacent to a soon to be operational sporting venue. The NSW Government has publicly committed to the SFS being completed in time for the 2022 NRL Finals Series. The construction of Stage 1 of the Precinct Village and Car Park (i.e.: the eastern stage) is proposed to be constructed concurrently with the final stages of the SFS's construction program by the currently appointed main contractor, John Holland Group.

Notably, the Precinct Village and Car Park is within the same footprint that allows access to the operational basement. Accordingly, any delay to this parallel build will compromise the operations of the stadium and the on-time completion of the SFS Project. This added risk will preclude the construction of the carpark, leaving the new stadium with no multi-level carpark and status quo to be upheld, being an at grade car park and on-grass carparking across Moore Park.

Venues NSW suggests that the CCC's concerns may be fuelled by the Greater Sydney Parklands Trust Bill ('Draft Bill') introduced in November 2021, after MOD 7 had been lodged with the Department for exhibition and the transport management plans had been well progressed. The draft Bill proposes to introduce a legislatively enforced end date for the removal of on-grass parking on EP3 as 31 December 2023, where no firm date had previously been committed, rather linking the removal to milestones. Venues NSW contends that the CCC members wish to take a political stance in support of the Draft Bill, and in doing so, are seeking to cast doubt over the merit of MOD 7.

For avoidance of doubt, MOD 7 cannot commit to a date for the removal of parking on EP3. The land on which EP3 is contained is outside of Venues NSW's land ownership and is therefore outside of Venues NSW jurisdiction. Secondly, and more importantly, as a strong advocate and champion for positive change in the Precinct, Venues NSW deems it irresponsible to specify a date for the removal of a critical piece of infrastructure, without first observing the impact of changes already set in motion, particularly when they are reliant on successful implementation of key transport initiatives by others, and which are outside of Venues NSW immediate control. It is also unreasonable to require MOD 7 to make commitments that are binding on third parties, and which are yet to be sufficiently progressed through standard NSW Government business case, funding and project approval decision making processes. Furthermore, it is premature to align a development consent to a Draft Bill, yet to be passed or enacted that may change.

It should be reinforced that attendances are extremely important to the State of New South Wales, as events at the SCG and SFS support an estimated 4000 jobs, and in normal years host over 100 events. We welcome more than 1.5 million fans annually and contribute approximately \$700m in direct & flow-on economic benefit to the NSW economy. Notwithstanding the emerging legislative context, the visitor experience and minimising impacts to our neighbours are key factors in ensuring the entire Precinct's successful operation. There are considerable changes expected in the Precinct with the introduction of the SFS, operationalising the proposed new Precinct Village and Car Park and implementing transport initiatives, all for the betterment of the Precinct. These changes need to be monitored and evaluated contemporaneously and in their operating context which will allow a methodical approach to the progressive removal of all on-grass car parking. The delayed or unsuccessful implementation of alternatives to EP3 by the legislated date, will severely impact game-day operations, undermine the NSW Government's investment, undermine public and sports partner confidence in Venues NSW ability to operate our venues and create a barrier to attending for many residents, particularly those in the west, south-west and regional NSW.

Just as we have done for EP2, it is critical that Venues NSW and its partners including Greater Sydney Parklands, Transport for NSW, and affiliated sports partners are given sufficient time to work across government to develop and successfully implement initiatives to allow for the progressive removal of on-grass parking on EP3 in line with the Moore Park Masterplan 2040 and the commitments given in the MOD 7 documentation.

Venues NSW trusts it has demonstrated to the Department that the CCC's concerns are unsubstantiated on the basis the consultation and engagement in relation to MOD 7 was transparent, meaningful and exceeded legislative requirements. We also believe that there is a reliable and robust framework in place to facilitate the implementation of transport initiatives in due course, and accordingly it is not prudent, nor is it appropriate to hastily remove on grass parking on EP3 as part of the MOD 7, particularly when to do so would significantly jeopardise visitor experience and the NSW Government's investment in the precinct.

Yours sincerely



KERRIE MATHER
Chief Executive Officer