

Submission No. 1 by Saving Moore Park Inc. on SFS Redevelopment Stage 2 EIS

Saving Moore Park is making four separate submissions:

- This one which deals with a range of issues
- Moore Park Master Plan Review
- Car parking on Moore Park
- The Driver Avenue steps

1. A range of issues

(1) Stadium development and design principles

(a) Stadium capacity

The DA seeks approval for a detailed design for a stadium comprising up to 45,500 seats (EIS, page 61). We note that the Stage 1 development consent was for a maximum stadium capacity of 45,000 seats (EIS, page 12) and that the Cox Architectural Design Statement also refers to a capacity of up to 45,000 patrons (Appendix B, page 20).

Recommendation 1: Consent should be given to a stadium with a maximum capacity of 45,000 seats.

(b) Design principles (EIS, page 61-62)

Our comments on how the design measures up to the design principles are as follows:

- Accommodating the functional requirements of a Tier 1 stadium within the loose fit envelope, located and oriented on-site to allow for external circulation and public domain spaces. Comment: The proposal achieves this.
- Designing a high-quality stadium that satisfies the complex highly functional requirements of a Tier 1 stadium as well as creating a unique and distinctive destination which responds to its setting amongst Moore Park, Paddington and the SCG. Comment: Whereas the former stadium was embedded in its landscape, this is less true of the Cox design whose bulk and scale are more dominating. We discuss this further in Section (4) below.
- Selecting materials that contribute to the distinctive design of the stadium and reinforce the unique destination characteristics of the Sydney Cricket and Sports Ground. Comment: This is not really evident in the materials indicated, nor in the details. There is much reference to 'sandstone coloured concrete'. The use of brick is also proposed and seen as a connection to the precinct. However detail is lacking of which bricks and how they will really connect to the precinct.

- Respecting the cultural and heritage significance of the site and surrounds by embedding visible and legible interpretations of the site's rich history into the design of the stadium and public domain. Comment: The proposal appears to achieve this, though see discussion under Section (5) below.
- Designing the public realm and open space to ground the precinct within its surrounds and ensure it belongs to its context. It should be robust to facilitate a heightened event day experience while providing the public with a tactile, human scale experience. The stadium site should facilitate enhanced access and use of Moore Park and the surrounding areas. Comment: While the intent is good, the connection with its surrounds is poor. The continuing reliance on surface carparking in MP1 is inconsistent with this principle and the six metre high Driver Avenue steps even more so. The latter is discussed further in our submission on the Driver Avenue steps.
- Providing high quality soft and hard landscape to extend the surrounding suburbs and context into the stadium site. Comment: The proposal appears to achieve this.
- Creating an active and dynamic stadium 'front door' along Driver Avenue to enhance the event day experience, transition from Moore Park to the stadium and provide connection to public and active transport nodes and routes. Comment: As noted above, the six metre level change does little to create an enhanced 'front door' to the stadium from Driver Avenue.
- Considering all users in the design of access and movement, including event patrons, service providers, those employed on-site and the general public in both event periods and day-to-day. Comment: The proposal appears to achieve this.
- Integrating the existing and proposed transport infrastructure and pedestrian paths with surrounding precincts. Comment: This has not been achieved. Our separate submission on car parking on Moore Park highlights how the Green Travel Plan fails spectacularly to achieve a shift from private to public transport. There's also insufficient information about how pedestrian paths are integrated.
- Promoting and supporting active transport uptake through the design and integration of the stadium into its surrounds and provision of infrastructure. Comment: We're not sure what "supporting active transport uptake" means. If it means public transport, then the previous comment about the Green Travel Plan applies. As noted above, integration of the stadium into its surrounds is impeded by the six metre level change posed by the Driver Avenue steps.
- Designing vehicle access and servicing to fulfil and streamline the operational requirements of the SFS, SCG, and Fox Studios without compromising the quality of public domain spaces. Comment: The proposal appears to achieve this.
- Accommodating a variety of permanent active tenants to promote the day to day use of the site. The retail/commercial provision should complement the use of the site and encourage visitors outside of event schedules and will include food and beverage outlets

or retail such as the venue merchandise store. Comment: See our comments below in Section (8) on ancillary land uses and commercial activation.

- Reinforcing clear wayfinding and signage that supports, in a clean and legible manner, seamless transition for the public from the surrounds into and with the site. Comment: The proposal appears to achieve this. However, see under (e) below.

(c) Stadium design (EIS, pages 64-72)

The Stadium design results in an excellent Tier 1 sporting venue. The arrangement of the stadium and the provision of contemporary amenities for players and spectators is a big improvement on the former stadium. There are significant issues, however, that either have not been resolved or for which no supporting information has been included in the application. These include:

- The materials and detail of the facades. The new ribbon façade has the potential to define the new stadium in a way that gives a real and long lasting identity to the building for many years to come. Use of bronze coloured aluminium louvres will only be successful if it is detailed appropriately and looks well considered. The SEARS asks for the following details to be submitted: “detailed annotated wall sections at 1:20 scale that demonstrate typical cladding, window and floor details, including materials and general construction quality.” (EIS, page 16) Recommendation 2: These should be submitted before determination so as to gain a clear picture of how the stadium will blend in with the SCG and other significant features in the wider precinct.
- Recommendation 3: The use of either ‘sandstone coloured concrete’ or brickwork for the base of the stadium should be confirmed before determination. If precast concrete is used, samples should be submitted that can be used as the benchmark. Will the aggregate be exposed? Will it be honed or polished?
- More detailed drawings of the roof and the structure are required. The drawings of the roof and structure should now be well advanced and are the critical element of the design and the key feature used to prefer the Cox design to the other two competitors. The roof is a significant element of the proposal and should be as low as possible, especially on Moore Park Road. One feature of the former stadium was the manner in which the roof swept up and resulted in a dynamic form when viewed from different vantage points on Moore Park Road. The new roof should aim to do this in a new way. Recommendation 4: Detailed drawings of the roof and the structure and details of the construction techniques and materials to be used should be submitted prior to determination.

(d) Public domain (EIS, pages 73-76)

The proposed public domain is of mixed quality. In particular, the six metre high “grand entry” steps at Driver Avenue are a detrimental addition to an otherwise improved stadium experience. The public domain will not be successful if there are barriers such as steps of

this scale that hamper ease of access and egress. Issues associated with these steps are discussed in our submission on the Driver Avenue steps.

(e) Signage (EIS, pages 77-82)

The wayfinding and signage strategy for the development and the wider precinct appear sound, though more details are required to understand the construction details and materials that will be used and the implementation strategy. If implemented sensibly and effectively, wayfinding and signage can be a positive addition to the whole Moore Park precinct where there is currently a wide variety of signage.

Recommendation 5: Wayfinding signage in the stadium precinct should be consistent in presentation and content with those in all areas where pedestrians approach the stadium.

(2) Number, type and duration of events

Our concern about the number, type and duration of events relates to the impact of noise levels on the amenity of nearby residents and impact on traffic in nearby streets and the demand for on-grass parking. We note that:

- SEARS 3 (EIS, page 27) requires the EIS to provide details of the proposed events and activities at the SFS and surrounding precinct, including the estimated number, type and duration of events and activities per year.
- SEARS 18 (EIS, page 33) requires that the EIS address “impacts on the Moore Park and Centennial Parklands due to any increased frequency of events and greater use of the on-grass car parking on Moore Park”.

The EIS states that “it is anticipated that there will be between 49-52 events per year and a maximum of 6 concerts per year” (EIS, page 121) but provides no other information about type and duration of events and activities.

The existing limit of six concerts or entertainment events (imposed by the EPA because of noise issues) will be retained (EIS, page 63), with an average of four per year over any five year period. Whether the EPA’s restriction is intended to apply to the number of individual concerts or the number of artists/groups is unclear, but we would argue that two performances by U2, three separate performances by Coldplay and a separate performance by Ariana Grande equals six concert events rather than three.

Recommendation 6: A condition of consent should be that the limit on the number of concerts and entertainment events should apply to the number of performances rather than the number of artists/groups.

The EIS proposes that there be no restriction on the number of other events. Indeed, quite the opposite. “The new stadium is capable of accommodating growth in existing sporting events and patronage as well as facilitating new sporting events or major event opportunities as they arise” (EIS, page 63). This is of concern as it highlights the potential for

growth in traffic and the demand for on-grass parking. There also needs to be clarification as to what limits will apply to new “major event opportunities”.

Rather than restricting the number of events, it is proposed that the operations of the stadium be governed by the Event Management Plan and restrictions on the hours of operations so as to ensure that the stadium does not give rise to any significant unacceptable impacts on the amenity of the locality.” (EIS, page 84) Information provided to the CCC demonstrates unequivocally that the Event Management Plans for the former stadium did not mitigate the impacts on the local community:

- Illegal street parking has consistently been widespread in areas close to the stadium
- Anti-social behavior associated with drinking has been commonplace in nearby locations
- Noise has at times been excessive

We note that there are plans to manage anti-social behavior, but with INSW taking the view that illegal parking is a matter for local councils, it is hard to be confident that Event Management Plans will be any more effective in the future than in the past. And which independent agency is going to monitor their effectiveness?

Our concerns about the impact on traffic and on-grass parking are discussed in detail in our submission on car parking on Moore Park.

Recommendation 7: Consistent with SEARS 3 and 18 above, INSW should be required to document the projected number of events at the new SFS. Specifically, it should address two questions:

- What is the maximum number of games expected to be held annually which are half full, peak events and concerts?
- How does this compare with the number of games held in each of the three full years prior to the demolition of the stadium?

Recommendation 8: So long as on-grass parking continues to be permitted at EP2 and EP3, and until the Green Travel Plan achieves a significant growth in the proportion of people using public transport, the number of sporting events should be capped at 52 and the number of concerts or other activities should be capped at six individual concerts or activities per annum, with an average of four per year over any five year period.

Recommendation 9: Any new sporting events or major event opportunities should be subject to a formal DA process which should identify impacts and limits that will be imposed on their type, duration and noise levels, impacts on on-grass and parking in nearby streets, strategies to curb anti-social behavior, etc.

(3) Relationship between the SFS redevelopment and Moore Park

In our comments on the Stage 1 EIS and in the CCC we’ve consistently sought to highlight the fact that INSW has taken an unrealistic and impractical view of the SFS redevelopment

project. Its only interest has been in what happens on the site. At best it's given lip service to the urban and parkland context within which the stadium sits.

Anyone with knowledge of the history of Moore Park and Paddington would appreciate that the redevelopment needs to be viewed in the context of its surrounds and the impacts on these need to be recognised and mitigated. This is acknowledged implicitly in Consent Condition B12 which requires INSW to identify how the redevelopment can support and contribute positively towards the Moore Park Master Plan.

SEARS 17 requires INSW to assess the impact of the proposal on Moore Park Conservation Area (EIS, page 33). The Office of Environment & Heritage [states](#): "The Conservation Area, which comprises Moore Park, Sydney Boys High School and Sydney Girls High School, has state historic, aesthetic and social significance" and that "The parklands, with its high level of recreational usage are held in high esteem by the local and wider community." We assume the inclusion of SEARS 17 reflects this assessment.

No reference to where the response to SEARS 17 is located in the EIS and its appendices is provided, and we've only been able to identify two references to it:

- The proposal is considered to have a neutral or positive impact on the wider Moore Park Conservation Area. (EIS, page 173) No supporting argument is advanced in support of this conclusion.
- Theme 2: Heritage, 2.1 Built Heritage (Appendix G, page 20): The SFS Project Opportunity is said to be that "The project should respond to the following built items of heritage significance/conservation areas: Moore Park Conservation Area". What this has to do with built heritage is anyone's guess, but the lack of a response underlines INSW's reluctance to address the environmental impact of the SFS Redevelopment on Moore Park.

A broad assessment of the impacts on the Moore Park Conservation Area might reasonably include such things as the need for additional pathways, signage and lighting, impacts on wildlife, impacts of on-grass parking on the community's use of the park, visual and overshadowing impacts, the impact of event-related traffic on surrounding streets, the potential for flooding due to run off from the stadium's hard surfaces, the location and number of bicycle racks and the location of a possible meeting area (Appendix I, page 14).

The community needs to understand and be assured as to the limits of these impacts – both during construction and once the stadium is operational. Some are discussed (with various degrees of superficiality) and some are mentioned, in passing. But nowhere is there an overall impact assessment of the SFS redevelopment on the Moore Park Conservation Area, as required by SEARS 17.

Recommendation 10: INSW should be required, as a condition of consent, to undertake a thorough assessment of the overall environmental impact of the stadium on Moore Park, consistent with the intent of SEARS 17. This should include a statement of the limits to any

impacts once the stadium is operational (eg in relation to gathering spaces or meeting areas, pop up stalls, etc.)

Recommendation 11: This assessment should be put on public exhibition (as it would have been had it been included in the EIS) and the public given 28 days to provide comments. Final approval should then be conditional on the Department's assessment of the community's views, with any further conditions that may be required to ensure the protection of Moore Park then being added and endorsed by the Minister.

SEARS 23 requires INSW to provide details of the impacts of the proposal on the Kippax Lake habitat and fauna, in relation to noise and light spill (EIS, page 35). We note that (a) the EP&A Act has, as an objective, the conservation of native animals and plants, ecological communities and their habitats (EIS, page 104), and (b) the Biodiversity report at Appendix JJ concludes that the ambient noise and light pollution associated with the construction and operation of the stadium is unlikely to have any lasting impact on the Kippax Lake habitat. However, this conclusion is not unequivocal and this impact needs to be monitored.

Recommendation 12: Having established a baseline with the report at Appendix JJ, a condition of consent should require the CPMP Trust to commission a further report, in conjunction with the SCGT, two years after the opening of the new stadium to confirm that the conclusions of this study remain valid. If the impacts prove to be more significant than predicted in Appendix JJ, the SCG Trust should then be required to take corrective action.

At the end of the discussion of visual impacts are three mitigation measures relating to tree protection (EIS, page 140). One of these states that "INSW and the appointed contractor should consult with the CPMP Trust prior to the commencement of operations to identify any practicable management measures to mitigate impacts of event crowds to mature figs and other associated vegetation around Kippax Lake. Timing: Prior to occupation. Comment: It is not sufficient just to consult the Trust, whose views could – as the measure is currently worded – be ignored. This would be inconsistent with its responsibility for Moore Park.

Recommendation 13: A condition of consent should be that the agreement of CPMP Trust be obtained to any impact mitigation measures required.

(4) Visual impact and Overshadowing

Ethos Urban has analysed the visual impact from 23 public location points surrounding the stadium and has assessed it as either LOW or LOW TO MEDIUM. This lacks objectivity and is nothing more than 'positive spin'. The visual impact from the ANZAC Parade Memorial is described thus: "The proposal and its roof form provide the main focal point, contributing visual interest to the typical view." (EIS, page 138) It certainly provides the main focal point but to say it contributes "visual interest" is absurd. The higher profile will lessen the impact of the final stage of Anzac Day Dawn services at the memorial. It is hard to envisage what the consultants would consider is 'high impact'.

The scale of the proposed stadium may be less bulky than the Stage 1 EIS Concept when viewed from certain perspectives, but the new stadium will be a much more imposing

structure than the now demolished stadium. Its walls will rise higher and present a much bulkier aspect to the surrounding landscape.

We are unable to reconcile the statement that the stadium has been shifted away from Moore Park Road with the statement that the separation distance between the stadium and Moore Park has been increased (EIS, page 128). The only way this could be achieved is if the footprint of the new stadium were substantially smaller than the old stadium. In reality, and as clearly shown in Figure 61 Appendix C1, page 32, its footprint will reach closer to Moore Park. Furthermore, the proposed six metre high banks of stairs will have a much more dominating visual impact from the Kippax Lake area. This conclusion is underlined by the reverse perspective: the proposal for a belvedere lookout (Appendix C1, page 32) - a clear case of making a virtue out of adversity.

The overshadowing of public open space within Moore Park to the west is said to be confined to a short period between 9am and 10am, with Kippax Lake unaffected. This is highly selective. If an 8am shadow diagram were included, the Park and Lake would clearly be over shadowed.

(5) Heritage

In principle, we support the focus on heritage interpretation relating to the historical and cultural significance of the site, and note that a number of historical themes have been suggested consistent with a framework prepared by the Australian Heritage Commission and NSW Heritage Council.

Recommendation 14: Mindful that the stadium site is just one part of what was once Governor Macquarie's Sydney Common, the site should be portrayed in heritage displays in its historical context, with the historical significance of Moore Park and Kippax Lake clearly (and accurately) indicated. (We note that the original name for Kippax Lake, Billy Goat Swamp, is incorrectly referred to in Appendix C1, page 20 as 'Nanny Goat Swamp'.)

Recommendation 15: To ensure such errors are not perpetuated, the CPMP Trust should be consulted before interpretive displays are finalised. This would also provide an opportunity for the Trust to develop any displays it wishes to locate in Moore Park so there is continuity and consistency in the way heritage information is displayed across the old Sydney Common.

Curio Projects states that "The next stages of interpretation will be refined ... through a process of community consultation and stakeholder engagement to ensure that the final interpretive products proposed are engaging, inspiring and represent the cultural significance of the site. This includes consultation with local residents, the local Aboriginal community, the SCG museum staff and SC&SCT (Appendix DD, page 69).

However in the recommended 'mitigation measures' (EIS, page 175), consultation with local residents has been replaced by consultation with the CCC. So there is no intent to engage with those residents who will be most affected, eg if displays involve LED lighting and other potentially intrusive displays. Also, none of those listed for consultation are authorities on

wide ranging heritage displays – there is no suggestion that the NSW Heritage Council or National Trust (NSW) will be consulted. Finally, indicative timing for this consultation is listed as ‘prior to occupation’ – an unreasonably vague term.

Recommendation 16: Consent should be conditional on

- consultation with the CCC and local residents, the local aboriginal community, the NSW Heritage Council, the National Trust (NSW), SCSG Trust (including SCG Museum staff) and CPMP Trust.
- A report detailing the outcome of these consultations should be provided to the Department of Planning and made publicly available before final approval.

(6) Sustainability

There are some commendable efforts to maximise the sustainability of the new stadium such as use of photovoltaic cells and rainwater harvesting. We also support the provision of multiple water fountains, to refresh visitors and to reduce the need for sale of plastic bottles. It is also noteworthy that the development seeks to comply with the international Leadership in Energy and Environmental Design (LEED) rating system (page 93).

However, it is disappointing that the Green Building Council of Australia has been excluded from this process. The GBCA is attuned to local nuances and Australian environmental conditions and would provide an appropriate sustainability assessment ranking for the new stadium.

Recommendation 17: A consent condition should require the proposal to comply with Green Building Council of Australia standards.

(7) Stormwater Management, Flooding and Groundwater

There are several inconsistencies in the statements about flooding (EIS, page 183). We are concerned that (a) the potential for serious flooding, which may affect Moore Park and Kippax Lake, is being under-estimated and (b) the opportunity to engineer a solution to a long standing problem is being ignored because it is external to the development site.

Aurecon’s modelling suggests that overland flows towards Driver Avenue will be consistent with those associated with the previous stadium. Flows will be directed away from structures and building entry points but “will be contained within the sporting precinct” (EIS, page 183). We are unable to reconcile this with the statement that that there will be increased flood waters on Driver Avenue.

Having suggested that the overland flows will be consistent with those associated with the former stadium, it then transpires that they may be 10mm to 50mm higher. This is dismissed as being minor, but it is then acknowledged that ponding outside the SCG, which “reaches depths that represent a flood hazard during major storm events”, could increase.

The expenditure of \$730 million on a new stadium has been justified as necessary because of problems with the former stadium. It is therefore unacceptable that the risk of flooding will increase - by any amount. It is also unacceptable that no effort will be made to fix a long-standing problem that has potential impacts well beyond the stadium site.

Recommendation 18: A condition of consent should be that INSW is required to produce a detailed plan designed to eliminate the risk of potential overland flooding of Driver Avenue, Moore Park and Kippax Lake associated with the hard surfaces of the new stadium.

(8) Ancillary land uses and commercial activation

The Stage 1 EIS states that the Stage 2 DA will include further details regarding the anticipated event profile, as well as of any ancillary land uses associated with the stadium such as merchandise stores, food and beverage and visitors and member's information, as well as details and assessment of the location, Gross Floor Area, anticipated trading hours and scale of these ancillary facilities. (EIS, page 60)

The Design Principles in this EIS include "Accommodating a variety of permanent active tenants to promote the day to day use of the site. The retail/commercial provision should complement the use of the site and encourage visitors outside of event schedules and will include food and beverage outlets or retail such as the venue merchandise store." (page 62) However all that is proposed are an externally-facing merchandise store and food and drink premises, fronting the north western corner of the site (EIS, page 85 and Figure 48).

We do not object to a store selling sporting merchandise and a single food and drink premises being incorporated in the design. Nor do we object to pop-up stalls on event days, so long as they are confined to the stadium site. However, it would be inconsistent with the purpose of the redevelopment for there to be a number of diverse commercial activities on the site, making it a poor man's EQ.

While there is no discussion in the EIS, there appears to be a shell space located directly under the concourse on Driver Avenue which is intended for future commercial use - refer to drawing A13.L0.01. If this space were not included in the development, there would be less need for the Driver Avenue steps. See the discussion in Section (9) below and in our submission on the Driver Avenue steps.

Recommendation 19: Consent should be confined to the activation proposed. However, we note that under its Act the SC&SG Trust doesn't need to do a DA if a proposed development is approved by the Minister for Sport. Consent should therefore also be conditional on the Trust giving a commitment that, if any further commercial activation is proposed in line with the Design Principles, it will undertake a formal DA process so as to give the community the opportunity to express their views.

(9) Members' facilities

While there is a section of the EIS that deals with "Off-site works – not subject of this EIS" (page 62), it is noteworthy that there is no comparable section "On-site works – not subject

of this EIS". The issue of new facilities for members is simply ignored. The only reference we've been able to locate is buried in Appendix HH, where the redevelopment of members' facilities is said to be "part of a separate planning and design process" (EIS, page 23).

We accept that the members' facilities should be subject to a separate planning and design process. However, we think it is material in assessing the EIS to understand where it is proposed to locate members' facilities.

There is a diagram which shows the members area between the SFS and SCG (EIS, page 89, Figure 51), though there is no accompanying commentary. We also note that there is a substantial shell space located directly under the concourse behind the Driver Avenue steps which is designated as being for "commercial facilities" - refer to drawing A13.L0.01. By this, does INSW mean members' facilities?

It is one thing to locate members' facilities in an area which is excess to the operational requirements of the stadium, another altogether to design the stadium and its precinct in such a way as to create space for members' facilities. Of course, even the latter isn't necessarily a problem. It only becomes one if there are significant downsides to the design which results. So if the design of the stadium and its precinct reflects the need to provide these facilities, then we feel this must be disclosed for those reviewing the EIS to be able to make informed comments.

If the shell space is to be allocated for members' facilities then it may reasonably be inferred that the need for the Driver Avenue steps may have less to do with the need for a level concourse than with the need to provide space for those facilities. If this is the case and there is in fact no compelling stadium design case for the steps, then all the concerns we raise in our submission on the Driver Avenue steps need to be viewed in a different light. The risks will far outweigh any public benefit – the benefit will accrue solely to members.

Recommendation 20: INSW and the SC&SG Trust should disclose where it is intended to locate members facilities and, in particular, whether it is intended that any part of these facilities will be located under the Driver Avenue steps.

(10) Construction management

Lend Lease has to date prepared only a preliminary Construction Management Plan (CMP), not a detailed CMP or Construction Environmental Management Plan (CEMP). (EIS, pages 168-169) It is proposed that the detailed CEMP be prepared "prior to commencing works".

The detailed CEMP will clearly need to demonstrate that the impacts of the construction works on the site can be mitigated and how they will be mitigated.

We note that, while high noise activities will be programmed to occur during the daytime hours wherever possible, they may be approved to occur "out-of-hours". In this case "noisy activities should be scheduled early in the night to minimise the impact on adjacent residents. Limit the number of consecutive nights receivers are impacted." (EIS, page 164) It is unclear which body will approve (or reject) requests for high noise activities out-of-hours,

what criteria they will use to make their decision, who will set the limits on the number of consecutive nights when noisy activities out-of-hours are permitted, and what consultation will occur with residents likely to be affected.

Recommendation 21: It should be a condition of consent that

- a detailed CMP/CEMP is prepared and made available to the public a minimum of three months prior to the commencement of works.
- The CMP/CEMP should explicitly address the issue of how high noise activities out-of-hours will be handled, including consultation with adjacent residents.
- members of the public be given adequate opportunity to provide feedback on the detailed CMP/CEMP.

We note (and support) the intention that there be no construction work during events at the SCG and two hours either side, and that Lend Lease will close all site gates and cover construction management signage. (EIS, page 168) At present, access to the SCG during events is provided from Moore Park Road, directly next to the SFS construction site.

Recommendation 22: In view of this, a condition of consent should be that, during events at the SCG and for 2 hours either side, steps be taken to ensure that all works at the SFS site are secure.

Saving Moore Park Inc.
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