



THE PADDINGTON SOCIETY Inc.  
For Community and Heritage  
Est 1964

Planning Housing and Infrastructure

24 January 2025

**Attention:** Katherine Klouda

Dear Katherine,

**Modification Application 10 for Sydney Football Stadium SSD 9835  
Resdesign of Precinct Village and Carpark**

Thank you for inviting our response to this Modification.

As a community organisation advocating for heritage, we have the following concerns re the protection of **Busby's Bore** in this Redesign.

- The documents exhibited by the applicant in support of the Modification lack clarity especially re the impact on Busby's Bore – the major reason for the Redesign. Changes have not been clearly shown on the drawings, nor clearly explained in the Planning Statement, nor a comparison with Modification 7 provided. We note, too, that the Planning Statement's Attachment 2 re correspondence from DPHI's Approval Team is missing. Most importantly, there is no evidence of the redesign options presented to the Heritage Council, only the statement that Option 3.4, a compromise option, is proposed. This all diminishes effective consultation with the community.
- Busby's Bore, including the abandoned spur line which runs through the proposed carpark, is a State Significant Heritage Item which must be protected under the Heritage Act. It is only in the archaeological report at Appendix H that we learn that it is proposed to demolish and relocate part of Shaft BBS-1, and to potentially demolish a 50m length of the Spur tunnel. Yet, Appendix E Statement of Heritage Impact does NOT assess the impacts of these proposals on Busby's Bore's heritage significance, nor does it consider alternatives or mitigation, stating that Modification 7 Condition B39 (j), which imposes the need for a Heritage Construction Management Plan if Busby's Bore is impacted, is sufficient. We do not agree and maintain that the applicant has not fulfilled its obligations under the Heritage Act.
- We agree with the Heritage Council's Approvals Committee minutes of 3 September 2024 which recommended a carpark redesign that would enable Busby's Bore, shafts and tunnel to be preserved in its entirety. We do not agree with any compromise solution that destroys part of the Heritage Item.

In conclusion, the applicant needs to fulfill its heritage obligations by redesigning to retain the highly significant and rare Busby's Bore, and the Redesign needs Heritage Council approval.

We ask the Department of Planning Housing and Infrastructure to refuse the Modification till this is achieved.

Esther Hayter President, The Paddington Society  
Per Linda Gosling, Vice-President, The Paddington Society 0406 614 217