

5 July 2019

The Hon. Rob Stokes MP
Minister for Planning and Public Spaces
GPO Box 5341
Sydney NSW 2001

Dear Minister

Sydney Football Stadium Stage 2 (Design, construction and operation)

The plan to demolish and rebuild the purpose-built, internationally renowned, award winning, 30-year old Sydney Football Stadium to upgrade facilities has little planning merit and will result in poor public outcomes. While my opposition to this project has not changed, demolition of the old stadium has already begun and my submission on the Stage 2 plans will focus on protecting adjacent environment and amenity from the new stadium build.

Bulk and Scale

Although the stadium will not occupy the entire envelope approved in the concept plan, the proposed building form represents a massive increase to bulk and scale in comparison with the old stadium, creating significant impacts. The old stadium was designed to respond to its environmentally sensitive location with the seating bowl sunk to reduce its scale and visual impact, respecting the heritage and parkland setting.

The proposed concave, sweeping form with drooping height of the proposed building aims to reduce scale but the building is at its biggest adjacent to its most sensitive boundary at Kippax Lake in order to create a "monumental entry experience". Indeed the proposed stadium will be elevated at the Driver Avenue entrance by Kippax Lake. As a result the building will dominate the Moore Park landscape. The lack of adequate setbacks exacerbates the building's prominence.

The height of the new stadium must be scaled back along the border of Moore Park.

The proposed stadium will result in significant increases in built form imposing on outlooks across heritage Paddington between the stadium and Oxford Street. Where parts of the old stadium dipped low and were hidden behind housing and vegetation, the entire roof will be visible from most vantage points making it the dominant feature. It will be particularly prominent along Oatley Road.

The building must be scaled back to prevent impacts on heritage Paddington views and vistas.

Moore Park

Moore Park provides essential space for recreation and important urban habitat to native wildlife. It is part of Governor Macquarie's 1811 Sydney Common Bequest, which set aside land for the outdoor recreation needs of Sydney residents. Less than a third of this bequest remains open public land. This proposal disgracefully seeks to make the stadium the most dominating part of the Sydney Common bequest precinct.



I share widespread community alarm about incremental encroachment, alienation and commercialisation of these unique parklands.

The parklands are facing increasing pressures from significant residential growth in surrounding suburbs including Green Square and Waterloo, with further massive population increases planned. New residents will need access to public green open space for their health and wellbeing. It is now more important than ever that we protect what is left of the parklands.

The government's decision to extend the planning portfolio to include public spaces, with the role to expand parks and green spaces along with its commitment to increase urban tree cover by planting five million trees by 2030 to combat Sydney's heat island effect recognise the importance of open space. The NSW Legislative Assembly is set to pass my motion supporting protection of Moore Park from the stadium rebuild.

Consent for this new stadium must reflect community concern about Moore Park impacts and the increasing recognition of the vital role of open green space and trees.

Aspects of the building's design pose threats to the tranquillity and wildlife of Moore Park, particularly at Kippax Lake. Last year five cygnets were hatched at Kippax Lake, and Moore Park trees provide natural habitat to other native animals including possums, lizards, insects and bats.

The environmental impact statement indicates plans to work with the Centennial Park and Moore Park Trust to improve pedestrian access through Moore Park and while I agree pedestrian links are important, I am concerned that the push will spread the stadium's footprint beyond the sporting ground's boundary and that grasslands will be heavily paved. Reference to a six-metre wide pedestrian footpath connecting the Tibby Cotter Bridge, the new light rail stop and Driver Avenue is alarming and will encroach on much needed recreation space.

Wayfinding and pedestrian pathways in Moore Park should not form part of any conditions or approvals for the stadium application.

Infrastructure NSW has indicated that there will be a 30 metre long media screen on the side of the stadium adjacent to Kippax Lake, which will cause significant audio-visual disturbance from bright loud videos. There appears to be no reference to the screen in this development application and it is not clear whether the proposal has been withdrawn or if it will be the subject of a future modification application.

Massive television screens adjacent to Moore Park are completely inappropriate and must be ruled out in the conditions of consent.

Stairway Entrances

The primary entrance to the new stadium will include two "grand stairways" on either side of Kippax Lake. The development application provides little detail about these stairways however information from the Community Consultative Committee indicates that they will be six metres high, making them imposing features in Moore Park. Large crowds ascending and descending the stairs will disrupt the already to be impacted peace and tranquillity of Moore Park. Plans to hold more frequent matches at the new stadium in comparison to previous arrangements will make these impacts more regular.

Close assessment of the noise impacts from large crowds using the stairs is required with design changes made to protect the peace and tranquillity of Moore Park.

Providing the principal entrance to the stadium via large stairways could breach accessibility requirements because people with reduced mobility including people who use wheelchairs or walkers, who have prams or who struggle with stairs because they are frail or have small children

for example will not be able to use the main entrance. This is not acceptable given one of the stated chief aims of the stadium project is to comply with contemporary accessibility standards. Providing two lifts for events of up to 55,000 patrons will force many people to experience long delays to access the building.

The principal entrance must be made accessible without impacts on Moore Park.

I am also concerned that the stairways create a safety risk given large crowds will be ascending and descending the stairways, providing distractions and crowding impacts with limited access to handrails. Some patrons leaving will likely also be intoxicated, increasing the risk of falls and injury to others.

Traffic and Parking

The development application and a number of public statements make it blatantly clear that the Sydney Cricket and Sports Ground Trust aims to continue using Moore Park for event parking in the long term. This betrays the Stage 1 condition of consent to identify ways that the project can contribute positively towards and support the principles, moves, opportunities, and strategies within the Moore Park Master Plan 2040, which has the permanent removal of on-grass parking as a key objective.

Removing on-grass parking has widespread community support and would enable Moore Park to achieve its potential as an open space community recreation resource.

When the new stadium opens, the light rail service will be operating and patrons will have a fast, efficient and affordable alternative to private motor vehicles in addition to existing train and bus services. The trust should seize this unprecedented opportunity to change how people travel to matches.

The secretary's environmental assessment requirements require the application to identify measures to encourage staff and visitors to travel by means other than private vehicle including providing "minimal onsite parking" for patrons and "integrated ticketing". The environmental impact statement fails this requirement by supporting car parking on Moore Park indefinitely and referring to integrated ticketing as a matter between the sporting codes and Transport for NSW.

The claim that the new stadium will not impact on traffic congestion because there is no change in capacity from the old stadium fails to acknowledge that events at Sydney Football Stadium currently cause traffic gridlock in adjacent areas and across the regional road network. This is especially bad when there are "double-header" events. Residents in adjacent residential precincts like Paddington and Surry Hills have regularly and repeatedly reported that it is impossible to access or leave their homes due to traffic congestion from patrons arriving and leaving the stadiums and there are longstanding problems with illegal parking during every major event. It should be accepted that traffic and parking impacts under the status quo are unacceptable and must not be allowed to continue with the new stadium.

Furthermore, the aim of the project is to increase the number of events on the site, which is inconsistent with claims that traffic will not be affected. Any increase in patrons or events under current operations would be disastrous to the traffic network and adjacent residential communities. Work must be done to encourage the use of sustainable transport options.

Approval should require the trust to commit to removing car parking on Moore Park by 31 December 2020 and require integrated ticketing for all matches and events held at the stadiums.

Amenity Protections

A cap on the number of matches held at the stadium is needed. Matches cause significant traffic and parking congestion and can alienate local parklands from public use through on grass car parking and crowd spill.

Adjacent communities should be guaranteed some respite from these impacts and not be threatened by event numbers regularly increasing without limit. It has previously been identified that the expected number of matches is 49 to 52 per year; there is no reason not to use this estimate to establish an appropriate cap. If there is a change in event circumstances, the trust can apply for a modification and give the community an opportunity to make submissions.

Conditions of consent must also impose controls to reduce impacts from “double header” events at the sports ground such as caps on the number permitted per year and enforceable requirements to stagger start and end times.

Protecting Moore Park must be at the forefront of the assessment and determination for this proposed development and I ask you to require appropriate changes and impose conditions to protect the parklands and local amenity.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'AG', with a long horizontal stroke extending to the right.

Alex Greenwich
Member for Sydney