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By email to Aditi Coomar

Submission - Sydney Football Stadium - Stage 2 State Significant Development

The Centennial Park and Moore Park Trust (the Trust) is making this submission in response to the public exhibition of the application for Stage 2 of a State Significant Development (SSD), being for the detailed design, construction and operation of the Sydney Football Stadium (SFS), proposed by Infrastructure NSW (INSW).

With reference to the exhibited Environmental Impact Statement (EIS) and associated documentation for this Stage 2 application, the Trust makes the following comments and recommendations - including raising a number of concerns - which in the Trust's view should be addressed during the detailed assessment of the SSD application and prior to any consent.

The Trust appreciates the project has achieved Stage 1 SSD approval and has commenced site establishment and demolition of the existing stadium. While the Stage 2 project therefore has the in-principle support of the NSW Government, and while review of the application indicates the architectural and landscape architectural design of the project generally demonstrates excellence, the Trust is concerned for the successful integration of the project within the parklands, and for aspects of its operation. These issues are discussed in detail throughout the submission.

This submission is structured against concerns emerging from key documents submitted in support of the SSD proposal, namely the Urban Design Report, Architectural Design Statement, Landscape and Public Domain Statement, Transport Assessment, Construction Management Plan, Security Statement, Operational Waste Management Strategy and Infrastructure Management Plan.

Urban Design Report

Connecting Pedestrian Infrastructure and Wayfinding

While the Trust appreciates the project application focuses on land controlled by the Sydney Cricket and Sports Ground Trust, the majority of people accessing the new SFS venue will arrive at the precinct after crossing land controlled by the Centennial Park and Moore Park Trust - specifically, Moore Park West, Moore Park East, and from Entertainment Quarter.

Without critical linkages, lighting, wayfinding and other pedestrian infrastructure designed, coordinated and implemented as part of the SFS proposal, the new stadium risks being disconnected from pedestrian and public transport networks.

The Urban Design Report highlights the need to link the SFS redevelopment to recent and ongoing projects in Moore Park - the Tibby Cotter Bridge, the new CBD and Southeast Light Rail stop and the recently modified bus loop. However, the SSD proposal stops short of making any commitment to the design or delivery of these links.

Existing footpaths and wayfinding in the area is currently inadequate and does not anticipate the foot traffic generated by the Moore Park Light Rail stop, and also do not yet adequately connect to the Tibby Cotter Bridge.

The exclusion of off-site works from the SSD proposal may be due to a desire to not be seen 'taking over' control of land beyond the SFS site, or possibly aimed at managing the total project budget. But equally, the project can't be successfully developed without this connecting infrastructure being delivered concurrent with the SFS.

The Trust restates its willingness to closely consult on this matter, and again extends its invitation for joint design workshops between INSW and CPMPT to resolve the form and detail of these critical links. In this way the applicant isn't seen to be proposing works beyond the subject site, but can make a commitment to their design and implementation in conjunction with the renewal of the SFS.

Importantly, the Trust's view is that the design and construction of this wayfinding and connecting pedestrian infrastructure, must be a pre-condition to development consent.

Architectural Design Statement and Landscape and Public Domain Statement

Driver Avenue

The Trust, reasonably, expects the redevelopment of the SFS will contribute to the design and delivery of an integrated public realm within the immediate vicinity of Moore Park east.

Moore Park 2040 calls for the management of Driver Avenue during event days as a safe pedestrian-friendly space - without necessitating its permanent closure to vehicles.

Given related concerns regarding connecting pedestrian infrastructure, it further emphasises the need for the Trust and INSW to work cooperatively to resolve and design the public realm treatment for at least the northern portion of Driver Avenue as part of the SFS redevelopment works.

This approach would at the same time offer an opportunity to resolve missing links in the pedestrian infrastructure (discussed earlier) and allow a range of precinct-wide issues to be resolved more strategically, minimising the risk of each venue in the vicinity duplicating facilities or operating in isolation.

The Trust's view is that to ensure the proposed public realm design treatment for Driver Avenue is consistent for its full length, any design solution for the northern portion should be able to be implemented in the future along the remainder of Driver Avenue.

Cycle Facilities in Moore Park

The Stage 2 proposal makes provision for the siting of bike racks around the SFS, including a number of locations along Moore Park Road, and also a bank of 30 bike spaces sited within CPMPT land along Driver Avenue (page 66 of the Landscape and Public Domain Statement).

The Trust believes a more strategic, precinct-wide, approach is required to ensure that unnecessary duplication of bicycle facilities is not promoted at each separate venue - the SCG, Hordern Pavilion, Entertainment Quarter and Royal Hall of Industries - along Driver Avenue, potentially contributing to unnecessary clutter in the public realm.

A strategic approach would potentially allocate a smaller component of cycling facilities at each venue with the balance strategically located across Moore Park east to serve all venues in the vicinity. In line with its earlier comment, the Trust invites a joint design workshop forum to resolve the optimal solution for precinct-wide cycle facilities.

Future Links to Fox Studios and Entertainment Quarter

The Architectural Design Statement makes mention (on page 36) that the redevelopment of the SFS will not preclude important future connections identified in Moore Park 2040. Similarly, the Landscape and Public Domain Statement (pages 49-51) reinforces this same point. This approach is strongly supported by the Trust.

Moore Park 2040 raised the potential for a north-south link from Paddington Lane, alongside the SFS, through to connect with the public concourse of the SCG (when the Messenger Stand is redeveloped), to the Victor Trumper Stand public concourse, and then via a bridge across Fox Studios' access driveway into Entertainment Quarter.

Moore Park 2040 also raises the opportunity for an east-west link, which would run between the SCG and SFS, and - at a suitable point in the future - connect directly into the heart of the Fox Studios precinct, on the alignment of Chips Rafferty Avenue.

Close review of the Stage 2 documentation suggests the proposal is capable of supporting these potential future linkages. However, the Trust's view is that the proposal should elaborate on not only the proposed SFS levels, but the appropriate levels and tie-in points (referencing existing SCG public concourse levels, the Bradman Terrace level, Fox Professional Studio levels and so on) so the future detailed design can deliver a clear, legible and accessible network of linkages.

Transport Assessment

Reduction of On-grade Car Parking at Moore Park East

The Moore Park Master Plan 2040 identifies an important aim of reducing on-grade event day car parking on turfed surfaces at Moore Park East (EP2 and EP3). The objective is to return these areas to high quality green open space not compromised by intermittent car parking. In particular, Moore Park 2040 identifies the creation of a 'village green' community space in the vicinity of Kippax Lake.

Importantly, the plan demands an orderly and strategic approach to manage down the number of spaces provided for on-grade event day parking, and this must be considered holistically in the context of the major event parking demand created by the SFS.

The Trust's view is that the SFS redevelopment must address and contribute to a reduction of event day parking on-grade within Moore Park east.

However, the SSD Stage 2 documentation assumes an indefinite continuation of on-grade event day parking at Moore Park east, asserting that any future reduction in parking numbers will only occur '*over the medium and long term*' (EIS section 6.3.1, page 153) and that '*there are no intentions (by the Centennial Park and Moore Park Trust) to modify event day parking arrangements*'.

These assumptions are incorrect and do not consider the opportunities currently being actively explored by the Trust to reduce on-grade parking at EP2 (Upper Kippax) as soon as possible.

Assessment of Existing Parking Numbers

The Trust is concerned for a possible overstatement of existing parking numbers in the precinct to support the redeveloped stadium. Specifically, the existing parking numbers presented for Moore Park east (Transport Assessment, Appendix A1.11, page 89) do not appear to be correct.

The Trust understands there are approximately 900 (not 1,000) spaces at EP2 (Upper Kippax) and 1,050 (not 1,100) at EP3 (Showground Field), potentially a shortfall of 150 spaces, which further highlights the challenges of returning on-grade parking to useful green open space.

Green Travel Plan

The proposed Green Travel Plan (EIS, Section 6.3.1, page 156) is, in the view of the Trust, modest in scope and detail, being particularly light on commitments to measures to further encourage a mode shift from private to public transport.

Of particular concern is the omission of possible event day 'park & ride' opportunities working in concert with the new light rail service. A 'park and ride' arrangement might supplement event day car parking provision in the immediate SFS precinct, and in principle,

might allow a SFS patron to park their vehicle at the University of New South Wales, Royal Randwick or ES Marks, and then transfer to light rail for the trip to the SFS.

Such a strategy would reduce the concentration of vehicles accessing the immediate precinct and would potentially support the reduction of event day parking on-grade at EP2 or EP3.

Construction Management Plan

Construction Vehicle Management

To maintain ongoing operational capacity in Moore Park, the Trust expects Driver Avenue will not be used for staging vehicles waiting to access the construction site. All construction vehicles should be accommodated within the construction works zone and not overflow into Driver Avenue or surrounding streets and roads.

Dilapidation and Make Good

The Trust confirms that Driver Avenue is under its care, control and management. Driver Avenue has been identified as providing access for construction.

The Trust appreciates the commitment to prepare a photographic dilapidation report to document the existing condition of the surrounding road network.

The Trust is of the view that any such dilapidation report should extend to other natural and built features of Moore Park east and Driver Avenue including trees, structures, Kippax Lake, bollards, footpaths, lighting and other existing services.

Dilapidation reporting should also be required where any augmentation of in-ground services is necessary. And while a photographic record is essential, any dilapidation reports should include additional detail on make-good provisions in the event of damage due to construction activity and document the condition of any affected assets before and after construction works.

Temporary reinstatement of any trenching works is not acceptable to the Trust, and it must be a condition of any approval to restore all built and natural assets along affected service routes to an approved standard that eliminates any risk to the public over the longer term.

Tree Protection

Any future conditions of consent must deal comprehensively with tree protection.

Notwithstanding the identified need for connecting pedestrian infrastructure to be designed and delivered with the SFS redevelopment, the Trust is very concerned for potential tree loss associated with the construction of new pathways, particularly around the Tibby Cotter bridge. In this vicinity there are a number of surviving *Phoenix canariensis* (Canary Island palms) planted in 1909 by Joseph Maiden, which are of considerable heritage significance.

Accordingly, the Trust suggests the following draft condition of approval for consideration:

'The tree collection in Moore Park is of outstanding heritage significance. These trees have national and local historical, aesthetic and social values. The Trust places the upmost priority on the protection of trees managed by Centennial Parklands. Any works on Trust lands must be carried out with tree protection as a priority consideration. Aboricultural impact statements must be completed prior to any construction works including widening of paths, installation of lighting and other infrastructure within any tree protection zones. All works must be carried out in accordance with the Botanic Gardens and Centennial Parklands Tree Protection Policy'.

Noise and Vibration Impacts

Noise and vibration will be of concern to affected tenants of the Trust in the immediate vicinity - particularly at the Hordern Pavilion, Royal Hall of Industries, Entertainment Quarter and Fox Studios. Mitigation strategies to minimise the commercial impact and disruption to these tenants across the precinct need to be carefully assessed.

Ongoing Events at Moore Park

The Trust's firm view is there must be no impact on the operation of Mardi Gras, the Sydney Running Festival or any other public event in the area as a consequence of proposed construction.

Ground Water Impacts

The Construction Management Plan identifies that Stage 2 works will involve excavation and piling, and the Trust is concerned for any potential impact to ground water given this ground water forms part of the urban catchment that sustains the Lachlan Swamps, important to the

ecological health of nearby Centennial Park. Additionally, the Trust currently depends on ground water bores in Moore Park for irrigation.

The Trust recognises that an appropriate ground water assessment has been prepared to determine water table levels and consider any potential impacts of construction. However, these appear not yet to be recognised in the Construction Management Plan.

A further, significant, risk to groundwater includes potential contamination from the existing underground petroleum storage tank within the SFS site. The Trust seeks further assurances that measures to mitigate potential contamination of ground water are in place prior to commencement of construction.

Erosion and Sediment Control

The Construction Management Plan appears to be generally silent on erosion and sediment control, despite the comprehensive nature of SEARs item 27. The Trust notes that based on the earlier stormwater report from Stage 1 SSD, it was proposed to connect the construction site to existing stormwater lines, some of which feed a number of the ponds at Centennial Park. Incoming water quality in Centennial Park is critical to the ecological health of the ponds, and further assessment of impacts and their mitigation is essential.

Security Statement

The Trust acknowledges the NSW Police Force Terrorism Protections Unit has recommended to not publicly exhibit the full Security and Risk Assessment Strategy Report. In lieu of the opportunity to respond to this strategy, the Trust raises its more general concerns.

Hostile Vehicle Mitigation

Measures to mitigate against hostile vehicle attack and the creation of stand-off distances to keep potential threats away from buildings and people is likely to be incorporated into the Stage 2 SSD proposal. The Trust is concerned that this must be a precinct-based strategy, incorporating all of Driver Avenue and not deal with the SFS as a single, isolated venue.

Given Moore Park is a major event destination with a number of co-located venues, a precinct-based response will ensure similar issues currently faced at the Sydney Cricket Ground (SCG), Royal Hall of Industries (RHI) and the Hordern Pavilion (HP) are addressed

at the same time to avoid potentially intrusive measures being replicated around each venue.

The approach to entertainment venues typically adopts two lines of defence - an inner and outer cordon. In principle, the precinct should share an outer cordon, with the western side of Driver Avenue appearing to be a logical place for this to be located for event mode, thus protecting pedestrians using the road space.

The key attributes of the Centennial Park and Moore Park Trust's 'hostile vehicle business case', previously submitted to NSW Cabinet, should be included within the project.

Operational Waste Management Plan

Waste Management

Waste management during event mode is a significant environmental issue for the Trust and the land it controls across the precinct, and is currently not well addressed in the Stage 2 SSD proposal.

Although the operational waste management plan outlines a complete strategy for the venue itself, it makes no consideration of waste generation or collection across the wider precinct.

The Trust notes there appear to be no waste collection facilities proposed within the public domain. Patrons exiting the stadium should pass well-designed, well-sited waste disposal facilities, which should also be coordinated on a precinct-wide basis.

An ad-hoc overlay of temporary measures is not supported by the Trust, and the optimal solution can only emerge from a precinct-wide strategy being jointly prepared by the Trust and INSW.

Infrastructure Management Plan

Potable Water and Fire Services

The Trust notes the identification of an existing 200mm water main along Drive Avenue. The Trust also anticipates this to be a Sydney Water asset and is unlikely to impact upon Moore Park. The detailed Stage 2 design indicates a potential for a second fire booster to be drawn off Driver Avenue, which may require trenching and associated works within the Trust's land. The Trust expects this issue will require clarification and approval.

The final location of any secondary pumps and boosters must be identified in the detailed design of Stage 2 and require NSW Fire Brigade endorsement and approval.

Sewer

The Stage 2 proposal identifies the main sewer line intended to serve the redevelopment of the SFS (and the SCG) runs along Driver Avenue and will require connection and potential augmentation - subject to a pending Sydney Water approval process. This may require works within Trust land and provision for make-good, including trenching and road closures are not yet described. This issue will require clarification and discussion with the Trust.

Gas

It appears the new SFS will seek to connect to gas mains along Moore Park Road. Final approvals for the Stage 2 proposal may require works in Driver Avenue. This issue will require clarification and consultation with the Trust.

Telecommunications

While no adverse impacts are anticipated, telecommunication services run along Driver Avenue and there may be a need to undertake trenching work with the roll-out of the NBN. Consequently, an application may need to be made to the NBN for site connectivity. This issue will require clarification and consultation with the Trust at the appropriate time.

Conclusion

The Stage 2 SSD application highlights the degree of alignment between the proposal and the Moore Park Master Plan 2040. It further refines the scope of the earlier Stage 1 SSD application prepared for the SFS. It is clear the authors have interrogated, understood and generally safeguarded the ideas and strategies documented in the Moore Park 2040 Master Plan.

The Trust appreciates ongoing consultation with INSW and has had the opportunity to relay a number of the concerns and recommendations outlined in this submission directly to INSW.

However, the Trust anticipates that pressure to define and limit the project to its subject site, and consequently, the exclusion of off-site works, risks delivery of a project that is disconnected from its urban and parkland setting.

It is of critical importance that connecting pedestrian infrastructure and precinct-wide strategies to ensure safe public access and a high-quality visitor experience are conceived, designed and delivered concurrently with the proposed SFS redevelopment. This is currently not evident in the application.

The Trust is keen to work with INSW to jointly resolve these issues and to maximise the public benefit and value for money derived from the redevelopment of the SFS.

Yours sincerely



Geoff Reinhard
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