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Co-Chairmen  
**Centennial Park Residents  
Association ("CPRA")**

Centennial Park NSW 2021

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

15 July 2019

Dear Minister,

**RE: SYDNEY FOOTBALL STADIUM ("SFS") REDEVELOPMENT  
STATE SIGNIFICANT DEVELOPMENT APPLICATION – Stage 2 Design, Construction and  
Operation - Environmental Impact Statement ("EIS")**

The Centennial Park Residents Association (CPRA) is the umbrella organization of the street committees of the Centennial Park precinct. Our charter includes the protection and preservation of the Centennial Parklands and the residential amenity of this historic garden suburb for future generations.

While we would like to reiterate our opposition to the demolition and rebuild of the SFS, we clearly cannot un-do the demolition that is near complete. Consequently, we are writing to you to express our concern in relation to various aspects of the EIS for the Stage 2 design, construction and operation of the SFS.

**Major concerns with the proposed stadium as detailed in the EIS:**

**1) Bulk and Scale**

The proposed stadium will create a monolith that dominates the surrounding precinct which is completely inappropriate given residential, heritage or environmental concerns. Whilst the maximum building envelope with a building height of RL 85.00 m has not been completely utilised, it is noted that the stadium is approximately 5 storeys high on Moore Park Road. This is in stark contrast to the previous stadium which had a sunken bowl reducing its height and allowing it to blend comfortably in with the local precinct. This is particularly problematic on the Driver Avenue side of the stadium where the building is approximately 7 storeys high and will dominate the vistas from the precious greenspace in Moore Park East including the historically significant Kippax Lake area. We consider the current design to be incompatible with the locality and to create limited public benefit for the disproportionate increase in bulk and scale. It is noted, in this regard, that there will be limited additional **public** seating in the new stadium to justify the size of the building and the spend from the purse of taxpayers in New South Wales. The community requests that the stadium be scaled down to reflect its environment.

## **2) Traffic Congestion**

The traffic congestion currently experienced by the precinct with the resultant flow on effects in the metropolitan network needs to be addressed. The EIS is largely silent on the existing problems experienced by patrons and residents alike in the precinct and does not propose a solution nor does it acknowledge that the problem is likely to increase with additional events being hosted at the SFS. Further, as outlined below there is an over-reliance on cars to transport over 50% of patrons to the SFS intensifying the issue. Traffic studies must be undertaken to address the gridlock resulting at the conclusion of events at the SFS. These issues are exacerbated when there is either a follow-on event at the SFS or the SCG resulting in patrons coming and going at similar times. It is vital that more and better public transport be provided.

The new light rail will not address this matter. The Green Travel Plan articulates clearly that the light rail will have limited impact on cars entering the precinct. Indeed, the light rail serves effectively as an alternative to buses and makes less than a 2% difference to overall capacity. Sustainable options need to be mandatory and must include integrated ticketing and a discouragement of driving to the site. There is a great need for leadership on this issue and one needs to look to Optus Stadium in Western Australia where cars are discouraged through integrated ticketing and no public parking being available on event days.

## **3) Carparking on Moore Park**

The proposed stadium does not seek to provide parking for patrons as it makes an assumption that the existing arrangements, which include on-grass parking on Moore Park, adequately address the need. This is completely incorrect and stands in contrast to the Moore Park Master Plan 2040 approved by the NSW Government for the Centennial Park and Moore Park Trust (CPMPT). That Plan has a long-term goal supported by the community to remove on-grass parking. It is a condition of consent that the stadium be consistent with the Moore Park Master Plan. It is hard to see how this can be satisfied without addressing parking on Moore Park.

The EIS ignorantly refers to parking areas rather than acknowledging them as on grass parking in parklands. Indeed, the EIS simply deals with this major issue by saying it is out of scope or by pushing the issue to be dealt with by negotiation between the Sydney Cricket and Sports Ground Trust ("SCGT") and CPMPT. Given the vast political clout of the SCGT, this is highly concerning!

We strongly support the removal of parking on our precious parklands including the abandonment of plans to expand car parks at the golf course, ES Marks Athletic Field and the Entertainment Quarter. The removal of carparking on our parklands will go a long way to addressing the traffic congestion in the precinct. The condition requiring that the stadium comply with the Moore Park Master Plan needs serious scrutiny for compliance. It is insufficient to leave agreement to the respective Trusts.

## **4) Pedestrian Pathways**

We are in agreement that pedestrian access should be provided to the new stadium, however, the EIS indicates that a 6 metre wide pathway will be negotiated with the CPMPT to connect pedestrians through Moore Park West and Moore Park East from Central

Railway, the Light Rail, Tibby Cotter and Driver Avenue. It is noted that a 6 metre pathway is akin to 2 lanes of a road raising questions as to future intention particularly given the manner of construction of the Tibby Cotter Bridge (ie vast over engineering and capable of supporting vehicles). Is there an intention to use this access for further parking on our precious greenspace? We are completely opposed to paving our parklands and want to see pathways kept to a minimum both in number and size.

## **5) Media Screens on the Proposed Stadium**

Moore Park East will be subject to continuous sporting images and noise pollution as a result of the proposed installation of screens wrapped around the massive circumference of the stadium thus diminishing the ability of people to indulge in passive recreation in the area). We are entirely opposed to this bombardment and assault on recreational users in the parklands. These have not been addressed in the EIS and we understand they have been withdrawn. This needs to be reflected in the conditions of consent to avoid future modification to approvals.

## **6) Signage**

We are not opposed to building identification signage per se, however the signage described in the EIS is excessive covering every conceivable surface (the building itself, walls, pylons, gates, etc). The stadium itself is proposed to have 4 signs indicating its "identity". It is hard to fathom the necessity for this. We are strongly opposed to this visual pollution and cannot understand why a tax payer funded asset should be utilised for this money-making exercise. In this regard, we have made the assumption that signage is limited to the naming rights associated with the stadium. We would strongly oppose the use of this signage for any form of advertising especially in the form of continuous play media for the reasons discussed in 5) above. We request that the prohibition on video styled advertising be included as a condition of consent.

## **7) Stairway**

As the stadium has been designed to provide on grade access at Moore Park Road, the Driver Avenue entrance is by definition significantly lower due to its topography. To provide access, the design incorporates a bank of stairs that are approximately 6 metres from street level. Given it has been acknowledged that the vast majority of patrons will utilise this entrance, significant safety concerns arise. These concerns arise when large crowds of people enter and exit the stadium in circumstances where they are trying to do so in emergency situations or where some are intoxicated or pushing to exit speedily. All of these instances increase the possibility of crowd crush and falls. This has the potential to be very dangerous and to cause injury.

In addition, such a large number of stairs raise issues of accessibility for the disabled, for families and the aged. The provision of just 2 elevators is markedly insufficient for the expected number of attendees.

## **8) Protection of Amenity due to Increased Usage of Proposed Stadium**

The SCGT is subject to an Environment Protection Authority "Notice of Preventative Action Number 1003904 dated 29.6.02" (available on the EPA website) which at paragraph (10) provides:

"Number of Concerts

No more than four (4) concerts per calendar year may be held on Trust land, including the SCG and the SFS."

A variation of Prevention Notice Number 1517780 dated 2.12.13 was issued to the SCGT however this did not amend or increase the number of concerts able to be held on Trust land.

Appendix Q to the EIS, which was prepared by the SCGT, says at paragraph 2.1 Event Frequency:

"The former SFS maintained a restriction on the number of concert events via a Noise Prevention Notice issued by the EPA. The Notice restricted concert events to a maximum of 6 per year with an average of 4 per year over any 5 year period. This restriction will be maintained in the redeveloped SFS."

Appendix Q to the EIS is incorrect in that the EPA allows a maximum of 4 concerts across both the SCG and SFS and not "...a maximum of 6 per year with 4 per year over any 5 year period." at the SFS. The conditions of consent must be clear as to the maximum number of concerts able to be held across the Trust land.

The Community strongly supports a cap on the number of events at the stadium and particularly events held either following or concurrently with the SCG. Respite needs to be provided to adjacent residents from continuing anti-social behaviour from patrons. Conditions of consent need to cap double-header, concerts and events at the stadium.

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We have highlighted above our specific objections to the Stage 2 EIS for the proposed stadium. Should you have any queries regarding this letter, please contact us.

Yours sincerely,

Julie Osborne

Peter Tzannes

Co-Chairs CPRA

cc: The Hon Scott Morrison, Prime Minister of Australia  
The Hon Gladys Berejiklian, MP and Premier of NSW  
Mr Dave Sharma, MP  
Lord Mayor of Sydney Ms Clover Moore  
Mr Ron Hoenig MP  
Mr Alex Greenwich MP