

OBJECTION – SYDNEY FOOTBALL STADIUM – STAGE 2 SSD

My submission follows:

Introduction

I objected to Stage 1 Proposal as did many others, raising a number of key issues, which were not adequately addressed in the RTS. Neither was promised feedback followed up. Nonetheless, the application was approved.

Time for an Independent Review

While not the subject of this application, given the extensive public debate that is underway about the inadequacy of the planning system, it is opportune time for the Department to take the initiative to independently review key components in this project. After all, the absence of adequate follow up by the Department in relation to a Modification for the Opal Towers project is considered by many has having led to the challenges that subsequently have arisen.

Unsolicited Bid should be part of the part of the application for the stadium

A recent media report that indicates the Stadium is part of larger scale works being considered by the SCG Trust, with the separate proposal underway in relation to a 'mega hotel', as part of an unsolicited bid to government. This has not been considered as part of this application despite its cumulative impact.

The proposal for a hotel should form part of this application so its cumulative impact is considered, rather than be part of unsolicited bid, which removes the process from the public eye.

Massing and Scale

The massing and scale is out of context with the character of the area. In short, it dominates the skyline and vistas, and spoils the very nature of Moore Park's Heritage conservation area and surrounding heritage areas.

In response, the elevations should be reduced to better reflect the very nature of the heritage area.

Operations and financial return is likely to necessitate more major events

The stadium is designed to cater for 45,000 patrons, namely 500 patrons less than the former stadium, other than when the 'field of play' is used, which provides an additional standing capacity for 10,000 people when in concert mode; i.e. in total 55,000 people plus around 1,500

staff.

The application maintains the existing limit of six (6) concerts/ entertainment events per annum will be retained. However, given the introduction of the 'field of play' for concert mode events along with the cost of the stadium (which revised budget is already \$800 Million without the associated auxiliary works); it is likely that an application will later follow for more large scale events.

While this would be the subject of a separate application, given the wide reaching ramifications not only locally but further afield (e.g. Cleveland Street, and Westconnex's Sydney Park Portal 'A2MP' traffic management), a proper operational plan should form part of this Application.

This is particularly relevant rather than the suggested Event Management Plan, where it is proposed that 'no restriction on the number of events hosted at the stadium' (except concerts) nor nature and type of events 'specifically defined' or limitation on 'double-header' events (max. 95,000 patrons), to avoid the 'imposition of prescriptive numerical restrictions on the number of events hosted' as it's argued this would 'impact on the ability of the new stadium to attract and host the infrequent major events that deliver the most significant per-event economic benefits to Sydney and NSW'. In short, this is not in the public interest as It has far reaching implications.

In addition, the operational plan should also consider, the cumulative impact of the SFS's operations in conjunction with the use of the SCG, and the unsolicited bid for a major hotel that was recently flagged in the media, as well as plans for the EQ, Royal Hall of Industries (which is currently on exhibition) and plans for the Hordern Pavilion (which is noted in the application for the RHI, is being the subject of a separate application).

And while it is understood the planning process does not provide for cumulative impact and enables applications to be considered in isolation, given the significant discourse currently underway about the planning system, it provides an opportune time for the Department to take the initiative to consider the full implications by way of independent report which evaluates the operational plans over a ten year period. In doing so it would also avoid any perception of biases given the project is being progressed through a government agency.

Community Consultation

Rather than a proper pre-consultation process which is typically the case before a SSD is lodged, the consultation process was more akin to an information event. Notably too, staff were unable to respond to number of questions. Specifically, no consultant was available who could respond to questions about the noise assessment presentation boards, or was there any adequate feedback afterwards in relation to questions about the location of the loggers and assessment process. Further, despite the 'pre-lodgement' consultation, it appears no major changes were made.

In response, it is crucial events are properly organised for the purpose of receiving timely feedback that can be incorporated in the design. This was not the case.

Noise Impact and Sleep Disturbance

Notwithstanding previous comments about the likely increase in the number of major events, the consultant's report raises a number of concerns. This includes the location of the loggers (and consequent background readings) and failure to identify the existing noise impact from major events on residents living in the side streets off South Dowling Street. In response the noise assessment should be reviewed independently.

Moreover, the proposed operating hours for sporting events are up to 11pm; similarly this is the case for concert mode. In the case of outdoor fixtures with sound amplification (days not preceding working days) events are propose to operate till 10:30pm.

Given the wider ramifications it is suggested the operating hours be reduced to a base of 10pm for all events, with any additional hours, subject to a trial period of five years. This is particularly relevant given the likely impact on sleep disturbance from major events later at night (and consequent movement of patrons leaving through local streets), when the background noise is reduced. This suggestion follows findings from the Federal Government's Parliamentary Inquiry into Sleep Health Awareness released earlier this year (<https://bit.ly/2y4XorZ>), which highlighted the health impact from sleep disturbance. This was not properly considered by the proponent.

Traffic Impact and Car Parking

Notwithstanding previous comments about the likely increase in the number of events, the application appears to rely on the continued use of Moore Park for car parking. This contradicts previous government and agency representations about the future use of Moore Park and the introduction of Light Rail to facilitate transport.

Further, the application appears to rely on the use of vehicles as a major form of transport vs public transport to facilitate access with inadequate reporting on viable options.

Notably too, is the provision of only 90 patron bicycles (and potentially another 60) for a stadium that catering to 55,000 people. Similarly, only 75 cycle spots are proposed for staff, despite an estimated 1,500 staff working for concert events.

In response, more detailed studies should be undertaken with view to making changes to the limit vehicle use, facilitate active transport and reduction in the number of events.

Excavation Works

In part, the elevation accommodates a basement level with a 360° ring-road. This will necessitate excavation works to install slab and piling to support the foundations which is proposed to be facilitated by cut and fill earthworks across the site. In addition, excavation of the bedrock in the NE corner of the site may be necessary, where the groundwater is the highest (Douglas Partners, Sept 2018).

This raises a number of questions, which independent review should follow.

Landscape Impact

The application states that seven trees more trees will be felled, which are in addition to the previous application. Located in the NE corner of the site, they are described as not of 'high landscape significance'. In addition, is another tree located in the 'road corridor' with a ratio of about 1:3 trees proposed to 'offset' the loss. It is proposed the replacement trees are largely native trees, with a pot size of 200L.

Given the massing and scale of the proposal, landscaping will be a key component to reduce the visual impact. It is suggested that the number of large plantings be increased, which should include a number of advance Moreton Bay figs on the Driver Avenue side to reinforce the existing heritage trees.

Community Use

The application proposes community use 'outside of event periods' through 'informal active and passive recreation spaces' within the new public domain surrounding the stadium with site accessibility on non-event days (as well as event days) thereby functioning 'as an extension of the surrounding public space' by removing all boundary fencing.

Similarly the recent application now on exhibition for the redevelopment of the Hall of Industries further along Driver Avenue is intended to promote the use of its adjoining (and shared) facilities with the Hordern Pavilion, outside of event use.

Yet the traffic study doesn't appear to consider these changes. Given the substantive increase in population in the neighbouring suburbs, much of which will be facilitated by high-rise apartment blocks with little open space, the use of Moore Park and the stadium surrounds is likely to attract substantive visitations. This needs to be properly considered as part of the application.

Modifications

A number of modifications have been lodged since Stage 1 approval. Despite wider public concern about the project, this includes a Modification in relation to the excavation works, which was not notified other than on the Department's website.

The period for feedback should be extended to enable proper community consultation.

Please Keep Me Informed

About any further reports including the RTS, so that I have the opportunity to comment.

Yours sincerely

Name Withheld