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Submission - Adaptive Reuse of the Royal Hall of Industries - State Significant Development

The Centennial Park and Moore Park Trust (the Trust) is making this submission in response to the recent public exhibition of an application for State Significant Development (SSD), being for the adaptive reuse of the Royal Hall of Industries (RHI) as a centre for high performance sport and community uses, proposed by Sydney Swans Limited.

The Trust is the landowner of the subject site and acknowledges its role in granting landowner's consent at a point prior to the lodgment of the SSD application.

With respect to the submitted SSD documentation, 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. This is proposed to ensure the detailed design, construction and operation of the proposed development can properly respond to the issues and concerns raised.

This submission is structured against concerns emerging from key documents submitted in support of the SSD proposal, including the Environmental Impact Statement, Design Report, Architectural Plans, Landscaping Plans, Traffic and Transport Assessment, Environmental Construction Management Plan, CPTED Assessment, Servicing and Operational Waste Management Plan and Infrastructure Management Plan.

Statutory and Strategic Context

The Need for an Holistic Precinct Strategy

The Trust notes that SEPP 47 (Moore Park Showground) establishes the primary development standards for the subject site, yet does not include controls for the Gross Floor Area in the vicinity of the RHI and Hordern Pavilion. The assessment of the SSD application should satisfy itself that additional Gross Floor Area created by the proposal is accounted for in considerations of other development proposals in the immediate precinct, including those at the Hordern Pavilion and Entertainment Quarter.



The Trust notes the approved Development Concept Plan for Entertainment Quarter establishes a number of urban design principles for the form and scale of future development within the precinct and further, the Trust's detailed vision for the precinct is outlined in the Moore Park 2040 Master Plan.

Given this policy context, the Trust had previously recommended the SSD application for the RHI be accompanied by a 'precinct strategy' that elaborates upon the Moore Park 2040 Master Plan for this area - focusing primarily on public domain works, access and linkages in the vicinity of the RHI, Hordern Pavilion, Driver Avenue and Errol Flynn Boulevard.

Such a 'precinct strategy' would ensure a more integrated and holistic response to Moore Park 2040 and a coordinated response to the design of the public realm. The Trust is concerned that left to a series of independent and sequential development proposals, the resulting public domain risks being fragmented, uncoordinated and piecemeal. This point is discussed further in the submission.

Heritage and Built form

Existing Heritage Fabric at the RHI

The Trust is satisfied the proposed adaptive reuse of the RHI is generally sensitively resolved, preserves the critical presentation of the building when viewed in the round, and preserves the spatial experience of the powerful central vaulted interior space.

The introduction of skylights are situated so as to not be visible from the surrounding public realm and are supported. The mezzanine is designed to be visually recessive to the primary structural elements of the existing RHI, is coordinated with existing facade fenestration, and is reversible. The interventions to heritage masonry elements - windows, doors and new openings - are generally discreet.

The Trust recommends the construction methodology for reversibility of new works be well-defined and carefully documented in accordance with the Burra Charter. The Trust seeks clarification of where existing heritage fabric removed from the RHI to create new openings and skylights will be safely and securely stored. And given the 27-year lease period, the Trust recommends that any conditions of approval specifically address the question of reversibility and the enforceability of make-good provisions, should the Trust wish to exercise this option at the lease expiry.

Finally, the Trust recommends a heritage interpretation strategy be prepared and implemented with the proposed works in order to present the heritage values of the RHI to building users and the public. It is important to enrich the appreciation and understanding of the heritage fabric and past associations of the place.



Lighting and Illumination

The Trust recommends a detailed lighting design be developed as part of the proposal in order to illuminate the important heritage assets, and provide liveliness, safety and activation of the precinct at all times of the evening. This is particularly critical along Driver Avenue, Errol Flynn Boulevard and in the context of the Hordern Pavilion, which should ultimately achieve a consistent lighting treatment.

Further to the Trust's earlier comment on the need for an holistic precinct strategy, an integrated approach to lighting design, especially within the shared plaza, is critical to achieving consistent and appropriate lighting levels for both event and non-event modes.

Proposed New Built Form and the RHI

The Trust remains concerned that the detailed design of the NSW Swifts Building (NSB) establishes a potentially awkward and unsympathetic relationship between the strong symmetrical form and orthogonal geometry of the RHI.

The Trust notes the role of the NSW Government Architect, the NSW State Design Review Panel (SDRP) and two design review sessions to date. After the initial design review, it would appear the State Design Review Panel shared similar concerns about the building form relationship between the RHI and the proposed NSB (refer page 147 of the Design Report).

In its advice, the SDRP called for a further examination of massing option 3, which places the netball court in an orthogonal relationship with the RHI. The Design Report (pages 147-160) canvasses further consideration of massing options 1, 2 and 3, but discounts option 3 on a range of criteria.

The Trust notes the three massing options were studied primarily in terms of the relationship between the NSB and RHI when viewed from Errol Flynn Boulevard and Lang Road, but not when viewed from Driver Avenue - which is a critical vantage point for the presentation of the RHI to Moore Park and Anzac Parade particularly.

The Trust seeks clarification that the final preferred configuration of the NSW Swifts Building has achieved the support of the SDRP, and recommends that further investigation of the potential benefits of option 3 - when viewed from Driver Avenue, Moore Park and Anzac Parade - be undertaken.



Additionally, the Trust notes the following points relating to the detailed design of the NSB:

1. The NSB incorporates the existing heritage wall along Driver Avenue and Lang Road as part of the design solution. The architectural drawings indicate the installation of a box gutter fixed to the rear of the heritage wall to create the building enclosure. The Trust is concerned to ensure the box gutter be suitably sized for the anticipated weather events, for long term maintenance, and is reversible. Additionally, it is not clear if the existing heritage wall forms part of the structural support for the NSB. This should be clarified and if necessary, accompanied by an assessment of structural adequacy.
2. The Trust assumes the NSB is capable of being maintained from within the subject site and not reliant on regular maintenance access from Driver Avenue or Lang Road. This point should be clarified.
3. The used of polycarbonate for a significant extent of the NSB facade is supported in principle. Noting the potential for this translucent material to be internally lit, the Trust assumes there is no intention to affix large format branding, signage or logos to the building facade. This point should be made explicit in any conditions of consent.
4. New building elements and components should adopt meaningful targets for water, energy and waste minimisation through design, construction and operation.

RHI and Hordern Pavilion Inter-relationships

The Trust notes the proposed adaptive reuse of the RHI is proceeding ahead of a similar anticipated SSD process at the neighbouring Hordern Pavilion. The Moore Park 2040 sets out strategies for greater public access and permeability across the wider precinct, and specifically encourages higher levels of activation to occur in the space shared between the RHI and Hordern Pavilion.

The Trust is concerned to avoid a scenario where the adaptive reuse of the RHI precludes or constrains opportunities for future access and activation in this area. This does not appear to be the case, with the formal public address and cafe uses being located to address the central plaza. However, the assessment of the SSD should confirm that no operational conflicts or constraints emerge from this shared central plaza space.

The Trust notes that the RHI proposal excludes any works within the central plaza, including lighting, which complicates the SSD assessment to the extent that the primary arrival experience and public address proposed for the RHI will be subject to a future design.



Public Domain and Landscape Design

Linkages to Light Rail, Fox Studios and Entertainment Quarter

Moore Park 2040 anticipates strong, clear pedestrian linkages between the Moore Park Light Rail Stop, Driver Avenue, the RHI, Hordern Pavilion, and beyond to the Entertainment Quarter and Fox Professional Studios.

Consistent with this point and earlier discussion, the shared space between the RHI and Hordern Pavilion is expected to facilitate improved pedestrian and cyclist movement, and support a better sense of address to Entertainment Quarter from Driver Avenue and the soon-to-be-completed Light Rail stop.

The proposal appears to be consistent with this objective, but the Trust is concerned the SSD proposal must not place any operational constraints on the future use of the central plaza.

Landscape Presentation to Errol Flynn Boulevard

The proposed landscape design improves the presentation and engagement of the RHI with Errol Flynn Boulevard, and is generally supported subject to the following points.

1. The Trust is concerned for the siting, prominence and scale (16.4m long) of the proposed fire services and bin storage structure. These functions have been grouped together and housed in a single structure, the scale of which begins to erode the otherwise positive move of opening the RHI building presentation to Errol Flynn Boulevard. The Trust also notes the close proximity of this structure to what appears to be a new kiosk substation. Together, these elements tend to create visual clutter and alternative siting strategies should be considered in order to diminish their cumulative scale and impact. Beyond the need to identify an alternative siting strategy, the general principle of siting these service elements in dense vegetation is supported.
2. The Trust is concerned that consideration be given to the need for handling and storage of operational equipment to ensure the physical environment remains uncluttered and provides safe, easy pedestrian movement.
3. The landscape design drawings indicate the introduction of a planter bed along the eastern and southern perimeter walls of the RHI. The Trust is concerned for long term maintenance and integrity of the heritage masonry, and requires these planter beds to be omitted, with the proposed pedestrian pavements immediately addressing the building line instead.



The Trust supports the other proposed planter beds adjacent to NSB and Errol Flynn Boulevard and would support a corresponding increase in their size as a result of omitting the planter beds of concern.

4. As noted previously, the Trust is concerned that in the absence of a coordinated precinct strategy for the design of the public domain, the final execution of public domain works at RHI, the Hordern Pavilion and Entertainment Quarter are otherwise left to a series of independent and sequential development proposals. Any approval must ensure processes are in place to avoid the resulting public domain being fragmented, uncoordinated and delivered in a piecemeal manner.

Transport, Traffic and Accessibility

The Shared Use of Driver Avenue

The Moore Park Master Plan 2040 calls for the management of Driver Avenue during event days as a primarily pedestrian space. Day to day access and parking requirements of the proposal for RHI must not preclude this important objective.

Security and Hostile Vehicles

The mitigation against hostile vehicle attack and creation of stand-off distances to keep potential threats away from buildings and people was not raised in the SEARs but is an important issue across the precinct - particularly during event days.

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), Sydney Football Stadium (SFS) and the Hordern Pavilion are addressed at the same time to avoid potentially intrusive measures being replicated around each venue.

The Trust acknowledges the proposed use of the RHI does not present a similar level of risk as other entertainment venues in the vicinity, but the underlying concern must be assessed, and future hostile vehicle mitigation strategies must not be precluded.

Construction Management, Noise and Vibration

Ongoing Events at Moore Park

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



Construction Vehicle Management

To maintain ongoing operational capacity in Moore Park, the Trust is concerned for cumulative impacts resulting from a number of major construction projects in the precinct, and expects Driver Avenue will not be used for staging vehicles waiting to access the construction site. All construction vehicles should be accommodated within a defined construction works zone and not overflow into Driver Avenue or surrounding streets and roads.

This matter appears to be addressed in the Environmental Construction Management Plan, but the Trust seeks clarification that no construction vehicle marshalling or vehicle holding will occur in Driver Avenue.

Mitigation of Commercial Impacts

Noise and vibration will be of concern to affected tenants of the Trust in the immediate vicinity - particularly at the Hordern Pavilion, 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.

The Trust notes that demolition and excavation associated with the proposal is relatively modest.

Driver Avenue Works

Driver Avenue comprises land that falls under the care, control and management of the Trust. Whilst the Environmental Construction Management Plan notes all construction access is planned from Errol Flynn Boulevard, there is no clear discussion of works requiring access from Driver Avenue - for example works to heritage fabric, entry stairs and balustrades or possible plant equipment needing to be craned onto the roof.

The Trust seeks to clarify the manner in which this will be managed with potential footpath and road closures, along with potential loss of parking. While unlikely to create a significant constraint during the normal working week, this issue does create potential impacts on pedestrian movements for those attending events in the Moore Park precinct during event days.

Event day management strategies will need to be agreed and implemented to eliminate construction impacts on pedestrian access and egress. The Trust recommends a condition requiring a permit (to be issued by the Trust) for each period of works requiring access from Driver Avenue.



Dilapidation Report

The Trust recommends the preparation of a photographic dilapidation report to document the existing condition of the RHI, heritage walls, and surrounding road network, particularly Driver Avenue and Errol Flynn Boulevard. The dilapidation report should extend to other natural and built features of Moore Park east and Driver Avenue including trees, structures, bollards, footpaths, lighting and other existing services.

Dilapidation reporting should also be required where any augmentation of in-ground services is necessary.

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.

Make Good Provisions

The Infrastructure Management Plan identifies the need to undertake upgrade works for sewer, water, power and stormwater connections to support the proposal.

The Trust is concerned to ensure necessary detail exists to define make-good provisions in the event of damage due to construction activity. The Trust seeks certainty that appropriate financial mechanisms are defined and in place - a bond or surety - to cover potential make-good works or rectification of possible damage occurring outside the construction boundary.

The mechanism needs to be adequate to entirely offset the costs of any make-good or rectification works which may be incurred by the Trust.

Tree Protection

The Trust is very concerned for potential tree loss associated with the proposed construction. Any future conditions of consent must deal comprehensively with tree protection.

A number of trees could be affected by construction works and will require an Aboricultural Impacts Assessment prior to commencement. Ideally any Aboricultural Impacts Assessment would be carried out prior to design so findings and recommendations can inform the design process.



The specific groups of trees which are of concern include:

1. A grove of *Angophora costata* between the RHI and Hordern Pavilion
2. A row of *Corymbia maculata* running along Errol Flynn Boulevard
3. A row of *Livistonia australis* at the intersection of Errol Flynn Boulevard and Lang Road

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 Assessment 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.'

Conclusion

The Trust anticipates working with Sydney Swans Limited towards the satisfactory resolution of these issues and concerns, particularly in the areas of pedestrian linkages and precinct-wide strategies for a number of aspects related to the RHI reuse and renewal, which are aligned with the Trust's vision for the future of Moore Park.

Sincerely,



Denise Ora
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