

## *SAVING MOORE PARK INC.*

14 Moore Park Road  
Paddington NSW 2021

23 September 2019

David Glasgow  
A/Team Leader  
NSW Department of Planning, Industry & Environment  
GPO Box 39  
Sydney NSW 2001

### **Adaptive Reuse of the Royal Hall of Industries**

Our Association has only recently been made aware of the State Significant Development Application by the Sydney Swans for the adaptive reuse of the Royal Hall of Industries. Noting that very few public submissions were received, we wish to make a late submission on behalf of the community. In doing so, we note:

- the views expressed by the City of Sydney (the CoS) and Centennial Park & Moore Park Trust (the Trust) in their respective submissions;
- your Department's request (16 August) that the Sydney Swans provide a response to submissions by 17 October 2019;
- your Department's request (16 September) for additional information.

Saving Moore Park was established in 2015 and is now the main community group whose focus is on preserving and enhancing the quality of Moore Park for future generations. 'Moore Park' is defined to include the Entertainment Quarter. We have more than 3,300 supporters and communicate with them via newsletters, Facebook, Twitter and Instagram.

Of relevance to this submission are some of our priorities:

- promoting public access by removing fences and other obstructions to the free flow of people
- providing facilities and activities that will respond to the needs of the community and encourage greater use of the Park
- ensuring the preservation of heritage items within the Park
- the removal of on-grass car parking from Moore Park and, more generally, the substitution of public transport for vehicular access, with commensurate reductions in traffic flows within the area.

In broad terms we support the application, which will give the RHI much longer lasting use than if it just stays as a temporary exhibition hall. The proposal will see the restoration and preservation of the building at no cost to the taxpayer, the provision of a range of facilities for community and public use and improved access to the Entertainment Quarter by

patrons using the light rail or otherwise accessing the site from Driver Avenue. However, we do share some of the concerns raised by the CoS and the Trust.

### **The need for a precinct strategy**

We endorse the Trust's view that a precinct strategy should be provided which describes and discusses access to the site and linkages with the surrounding streets and areas. In doing so, it should have regard for the Moore Park Master Plan 2040, which sets out strategies for greater public access and permeability. Noting that the Hordern Pavilion will be the subject of a separate DA or SSD process, with different consent authorities, we share the Trust's concerns that "left to a series of independent and sequential development proposals, the resulting public domain risks being fragmented, uncoordinated and piecemeal".

We also share the Trust's views that the shared space between the Royal Hall of Industries and Hordern Pavilion should be open and unrestricted, and so accessible by the public at all times. This will quickly become the main point of entry to EQ by those using light rail or otherwise entering from across the Park or from Driver Avenue and it would be inappropriate for this key entry point to be open at some times and blocked off at others. The provision of unrestricted access should be a condition of consent.

### **Report on community use**

The Sydney Swans place great emphasis on the range of community and public facilities that will be provided. Some of these relate to everyday use (Red Cross Blood Bank Donor Centre, café) but others will be able to be reserved (the 60m x 30m multi-purpose indoor facility and an 80 seat auditorium). We would like to see, as a condition of consent, that the Sydney Swans provide in their Annual Report details about how and the extent to which the community avails themselves of the facilities on offer.

### **Heritage**

We note the CoS view that the Heritage Impact Statement (prepared by Urbis) is "inadequate and lacks information in order to provide a comprehensive evaluation on the heritage impacts of the development". We note Urbis's view that that the building is robust and has been periodically adapted to suit a variety of uses. However we are concerned at the proposed creation of two new openings to the north façade, one to the south façade and one to the eastern facade.

The Conservation Management Plan 2007 identifies all façade and roof elements of the RHI except for a section of the southern façade as being of "exceptional significance", requiring that "all original or early fabric shall be retained". We are unable to reconcile these statements with the new openings proposed. We believe the Department should ask the Swans to provide advice from an independent heritage architect that confirms that the heritage integrity of the RHI will not be compromised by the development proposal.

We support the Trust's view that a heritage interpretation strategy should be prepared and implemented so as to present the history and heritage value of the site to the public. As the Trust states, "It is important to enrich the appreciation and understanding of the heritage fabric and past associations of the place."

### **Signage**

We endorse the Trust's view that it should be a condition of consent that no large format branding, signage or logos be attached to the building façade. Signage and wayfinding should be consistent with a precinct wide approach.

### **Trees**

We note, and share, the reservations expressed by both the CoS and Trust concerning the removal of six trees, but note the City's comments that the tree management reports provided contain "many inconsistencies and contradictions", preventing an evaluation.

We note that the condition of consent proposed by the Trust emphasises the importance of tree protection. As the trees are on Trust land, we are content to leave the Trust to make the final decision as to how many trees may be removed, though we are attracted to the CoS suggestion that at least some replacement trees should be capable of growing taller than 15 metres and having a broad canopy.

### **Transport and access**

We are concerned that the proposal makes no genuine effort to minimise the impact on the demand for parking and traffic flows in the surrounding streets.

While potential measures and initiatives are identified (a so-called Green Travel Plan) that might encourage more sustainable travel modes, the assessment's lame conclusion - that it's difficult to predict what measures might be achievable - suggests little will change, except that car numbers will grow. 78% of staff drive to work (more than twice the existing mode share to the surrounding Moore Park area). Staff numbers are expected to rise so that daily parking demand will rise from 120 to 225 spaces. This is despite the fact that the area is well serviced by buses and, before long, by light rail. The proposed development includes provision for 11 on-site parking spaces - most of the rest will use the EQ carpark.

The impact on traffic flows looks to be understated. Turning left from Driver Avenue into Lang Road and left or right from Errol Flynn Drive into Lang Road is already tortuous, with quick light changes and lengthy delays. The extra car numbers will aggravate this situation.

These considerations underline why a much stronger Green Travel Plan is required with clear target outcomes, and with the Swans required to report annually on progress against these targets.

Michael Waterhouse  
Chairman