

2 April 2017

I am writing simply as a concerned citizen. In summary the concerns are broadly in the following areas:

1. The park has been gradually whittled away over the years since enactment in 1857.
2. Parramatta Park land has been divested for various uses other than park land but in particular for car parks, Cumberland football oval, later the Parramatta (Pirtek) Stadium, now demolished.
3. This ongoing divestment of Parramatta Park is not for the benefit of the people of Parramatta and of NSW (the Park is of historic significance not just to Parramatta but to NSW and Australia as a whole).
4. The mid-century historic Parramatta Memorial Pool is to be demolished to make way for the stadium which the community clearly opposes.
5. The upgraded stadium which will require even more of the park land divested for purposes that will include offices, carparks, and other types of non-recreational use.
6. Visual impact will be moderate from several views around the park.
7. Permanent or long term employment will not be created.
8. The stadium will be noisy and will disturb residents in the area when events are on.
9. Rugby league spectators are in decline and there are already two other major stadiums including Allianz Stadium at Homebush which are not at capacity.
10. The EIS gives the case using planning jargon such as activation and urban regeneration when applied to a historic park of national significance leads to the destruction of parklands and heritage. The heritage reports indicates that there will be heritage impacts and there is no clear strategy to prevent this, apart from unquantified "mitigation" through architectural materials.
11. The stadium is meant for sport and will not play a significant part in the cultural investment in Parramatta.
12. Planning and demolition has proceeded apace despite inadequate consultation with stakeholders.
13. The Stadium will physically encroach on significant areas of Parramatta Park as stated in the Heritage Assessment Report.
14. For ten out of sixteen heritage views the assessment demonstrates that the impact upon the broader buffer area around the World Heritage Listed site will be moderate.

While not specifically concerning this EIS I make the following comment that despite having some small experience in analysing multiple sources of information very quickly it has taken 5 hours to write a brief submission that will probably not be given much regard, and could have easily spent 20 hours.

However the experts who wrote the EIS and associated reports are obviously paid by the same government department which is driving the stadium upgrade. There are over 20 such documents comprising the EIS therefore I estimate that the cost of the Stage 2 EIS alone was upwards of \$30,000 and more likely around \$100,000 or more. The point I am making is that the general public is at a significant disadvantage in even trying to understand planning reports in the often obtuse and jargonised manner in which they are written, much less write a detailed submission or paying for expert advice to address each report in the EIS.

Some itemised concerns about the specific content of the EIS are primarily presented in Table form for convenience:

Statement or Attachment	Extract from the statement or attachment	Concerns
Visual impact assessment	<i>"The NSW government has identified the redevelopment of the Western Sydney Stadium as a major urban renewal project".</i>	<p>To give the stadium the label of an urban renewal project is a misnomer because urban renewal refers to land redevelopment in areas of moderate to high density urban land use.</p> <p>The land that is due to be redeveloped was crown land zoned for recreation, not high density so while this may be deemed a state significant development by the Minister for Planning, this cannot be called urban renewal.</p>
EIS	<i>"The Project will also assist in creating hundreds of jobs".</i>	<p>Sec 3.9 indicates that only casual jobs will be created during events when the operational phase commences. The hundreds of jobs are casual and temporary only during events which may occur.</p> <p>Currently between 22-23 events are held at the existing stadium each year so the hundreds of jobs claimed will be available for less than 0.6% of the year.</p>
EIS	<i>"It is anticipated that between 43-44 events will be hosted at the new Western Sydney Stadium each year."</i>	No evidence is provided for this estimate. Rugby league crowds are down.
EIS	<i>"It was determined that the location for the new stadium would be the site of the current Parramatta Stadium as it would complement the</i>	Suggests the new stadium was predetermined before stakeholder consultations.

	<i>current strategic direction and growth of Parramatta."</i>	
EIS	<i>"The Parramatta CBD and the Greater Parramatta Region more broadly are growing rapidly and will continue to grow as Sydney's Central City. The existing Pirtek Stadium accommodates approximately 20,000 seats and provides little activation or amenities outside of event periods."</i>	The new stadium is built on park land that was already well activated by the pool. Activating historic parklands by imposing a huge structure on it is a contradiction to the use of the park. The area should have been activated by cycleways, picnic areas, gardens, playgrounds etc.
EIS	<i>"The growth of the Western Sydney region combined with the number of sporting teams and fan base in the region have outgrown the capabilities of the existing stadium. "</i>	<p>Rugby league spectators and fans are decreasing and this trend has continued over 10 years.</p> <p>"Figures in the NRL's 2015 annual report reveal average attendance last season slid to 15,078 which was down five per cent from 15,906 the previous year and this slump continues."</p> <p>http://www.espn.com.au/nrl/story/_/id/18828427/nrl-crowds-slump-sydney-rain</p> <p>http://www.dailytelegraph.com./news-story/c3aa3ed2434bd48ac330c3bcc64800f1</p>
EIS	<i>"The new WSS will provide a significant cultural investment in Parramatta with an improved facility for sporting teams as well as revitalised stadium precinct that includes opportunities for activation outside of event periods and a comprehensive reconfiguration of the public domain."</i>	The new WSS is primarily for sporting purposes and there is no evidence that this will play a significant part in the cultural investment in Parramatta apart from vague descriptions of a square to be used for some sort of unspecified cultural purpose. Existing stadiums namely the Sydney Cricket Ground and the Allianz stadium are largely not used for cultural purposes.
EIS	<i>"The Stage 2 DA will seek consent for the detailed stadium design as well as supporting retail and function uses, public domain improvements, vehicular and pedestrian access and circulation arrangements, noise mitigation and event management measures."</i>	Parramatta parkland is being used for retail use, parking and other non-recreational uses which are not within the zoning R1. Several schools are within one block of the stadium will be severely affected by noise when events are being held or preparations being made.

EIS	<i>"The site is located approximately 1km from the Parramatta Train Station."</i>	The site is not within walking distance of Parramatta Train station thus the stadium users and spectators will be more likely to drive to the stadium causing increasing traffic congestion.
EIS	<i>"The stadium is located in close proximity to the future Western Sydney Light Rail alignment and the relocation of the Museum of Applied Arts and Sciences (the Powerhouse Museum) as well as the future West Metro line to Parramatta. "</i>	Western Sydney Light rail is still in planning. Relocation of Powerhouse Museum projects is concept stage and is the subject of current parliamentary inquiry. The west metro line is in concept stage only. These cannot be taken into account in the EIS at this stage.
EIS	<i>"Consultation with stakeholders Roads and Maritime Services ☐ Transport for NSW City of Parramatta Council ☐ Parramatta Light Rail ☐ National Rugby League ☐ Heritage Council NSW ☐ North Parramatta Residents Action Group."</i>	NPRAG clearly indicate that they have never been properly consulted. Minutes of said consultation not available. No minuted consultation of other stakeholders, no local resident focus group consultation, no consultation with other environmental groups, no consultation with nearby schools, or other potentially interested stakeholders. Consultation has not been adequate.

Noise and vibration assessment, EIS	<p><i>“Based on this, the noise emission model predicts a noise level of 78dB(A) Leq at the nearest receivers of noise on O’Connell Street during events.</i></p> <p><i>...The report concludes that the stadium has the capacity to fully comply with noise emission requirements, which have been formulated in accordance with the NSW EPA Industrial Noise Policy. 5.13.2 Construction Noise</i></p> <p><i>“The assessment provides that the unique nature of a Stadium does not have standard noise guidelines for events and as such the noise management goals used in the Allianz Stadium Noise Management Plan have been used to develop the noise management measures for the stadium.”</i></p>	<p>The stadium will come under the jurisdiction of the EPA industrial noise policy and EPA Industrial Noise limit only during construction stage and the report assessed the impact of crowd noise rather than construction noise which has not been assessed.</p> <p>The stadium will come under the EPA jurisdiction generally and specifically the Protection of The Environment Operations Act 1997. While there are no decibel limits set for the stadiums the EPA is active in enforcing community concerns about noise. As a guide, the Summary of Prevention Notice No. 1 – Centennial Park and Moore Park Trust, or the cricket ground LA Max must not exceed 70 dB(A) therefore the stadium as proposed will exceed this level even with mitigation.</p> <p>(http://www.epa.nsw.gov.au/resources/noise/20130127NGLG.pdf)</p> <p>It is clear that noise is going to an ongoing issue of concern, current plans for mitigation will affect commercial bottom line and will not be sufficient to mitigate the noise during events particularly concerts and all day sporting events. Sufficient reduction of the noise by restricting the hours and types of events will impact on commercial viability.</p>
Noise assessment	<p><i>“Noise Management Plan is recommended that is regularly updated after measurements of concerts and events. This is to include:</i></p> <p><i>Mitigation measures proposed</i></p> <p><i>– Requirements on limits to the days and times of events; – Requirement for notice to consent authorities; – Notice to the community including residents and businesses; – Optimal setup of sound amplification systems; – Noise monitoring requirements; – Complaints handling; – Encouragement of community feedback; – Making</i></p>	<p>The requirement on limits to days and times of events will impact on commercial viability of the stadium.</p>

	<i>the Noise Management Plan publicly available; and – Regular review and update of the Noise Management Plan. ☐ Compliance with the detailed Demolition, Excavation and Construction.”</i>	
Heritage Impacts Statement		<p><i>“Adjoining heritage items will be subject to potential direct physical impacts (parts of Parramatta Park, including those adjoining the Government Farm and archaeological sites associated with the mill pond and mill race from the former Government Mill). Other heritage items in the vicinity will be subject to visual impacts to varying degrees, dependent on their proximity to the Stadium and the nature of intervening structures and vegetation.”</i></p> <p>The report goes on to claim that the visual impacts will be minimised by architectural materials. This is clearly an afterthought and there is no evidence that the heritage experts have expertise in visual impact or architectural materials.</p>
Heritage Impacts Statement		<p><i>“The Stage 2 DA intrudes into the SHR curtilage for Parramatta Park and Old Government House and adjoins the buffer zone for the WHL curtilage for Old Government House and The Domain, one of eleven sites that make up the Australian Convict sites on the WHL. There is no mitigation for this in the report.”</i></p>
Heritage Impacts Statement		<p><i>“20% of the building height (other than lighting towers for Parramatta Stadium) will not be contained below the established tree canopy of Parramatta Park when viewed from any of the key viewing locations from OGH. “</i></p> <p>There will be increased visual impact to Old Government House and the parkland setting that cannot be eliminated.</p>
Statement of Heritage impacts		<p><i>“The Proposal will physically encroach on significant areas of Parramatta Park. The proposed video screen on the northeast corner of WSS is large and will have a high visual impact as viewed from the public domain.</i></p>

		<i>Compared with the existing stadium, the proposed stadium is larger than and closer to the significant cultural landscape areas of Parramatta Park, including the OGHD WHL area, Government Farm and the Parramatta River corridor. This will result in visual impacts on views from some viewing points within those areas and other viewing points in the public domain."</i>
Statement of Heritage impacts	<i>"Managing of the ACM presents some difficulties in this area due to the uneven nature of the site. Testing trenches will need to be excavated in proposed areas to determine excavation strategies to remove ACM and how it should be managed. It is acknowledged that this is a complicated process but Lendlease have assured Casey & Lowe that they will be willing to co-operate to achieve the required conservation outcomes....It is acknowledged that this is a complicated process but Lendlease have assured Casey & Lowe that they will be willing to co-operate to achieve the required conservation outcomes."</i>	There is no detail about how this cooperation will be achieved, and how the conflicts between commercial decisions and heritage needs will in fact be balanced on the side of heritage, when so far this has not been the case.
Consultation Outcomes Report	<p>Community concerns included the following:</p> <ol style="list-style-type: none"> <i>1. closure of Parramatta Memorial Swimming Pool</i> <i>2. crown land rulings were pushed through to achieve this outcome. Lack of understanding as to why another design wasn't considered, one that would save the swimming pool.</i> 	<p>Responses from the consultation team were inadequate, particularly the following:</p> <p><i>"The closure of Parramatta Memorial Swimming Pool does not form part of this project therefore the design team is unable to comment on future plans to replace the pool."</i></p> <p><i>"The location of the proposed Western Sydney Stadium was identified and finalised prior to the development of the proposal and the design team is unable to comment. "</i></p>

	<p>3. <i>Concern that the chosen site is not the best place to build a new stadium.</i></p> <p>4. <i>Concern about transfer of land from Parramatta Park Trust to the Stadium Trust.</i></p> <p>5. <i>Concern about the potential impact on the Fleet Street Heritage Precinct</i></p> <p>6. <i>The community would like to understand heritage impacts of LED screens</i></p>	<p>No response from consultation team.</p> <p>The only response from the consultation team to the transfer of land was one word - “noted”.</p> <p>The consultation team failed to admit that visual impacts will be in many cases moderate as indicated in the heritage report and visual impacts assessment.</p> <p>The consultation team only stated that the Southern LED screen was removed in light of this concern. However the heritage report stated that screen impact in general will be significant.</p> <p>Public consultation is a regulatory process by which the public's input on matters affecting them is sought. Its main goals are in improving the efficiency, transparency and public involvement in large-scale projects or laws and policies.</p> <p>Consultation is supposed to be a two-way flow of information and opinion exchange as well as participation, involving interest groups in the drafting of policy or legislation or planning decisions.</p> <p>However in this case the consultation team were unable to deal with the major concerns raised, and the objects of consultation such as transparency was not achieved, all key stakeholders were not involved and the major concerns of the few community stakeholders who were contacted were ignored or fobbed off.</p>
Consultation Outcomes Report		<p>For ten out of sixteen heritage views the assessment demonstrates that the impact upon the broader buffer area around the World Heritage Listed site will be moderate.</p>

