

Planning Services
Department of Planning and Environment
GPO Box 39 Sydney NSW 2001
Attention: Director – Industry Assessments

Our Ref	NCA/4/2019
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24 December 2019

Dear Mr Fetterplace,

COUNCIL SUBMISSION

**SSD 110354 – Wilson Park, Sydney Olympic Park
Cricket NSW Centre of Excellence**

I refer to the public exhibition of the above application for the construction and operation of a dedicated cricket training and administration facility, community facilities, associated car parking, landscaping and public domain works.

Council officers have reviewed the application package and request that the following comments are appropriately addressed and taken into consideration in the assessment of the application. It is considered that further consultation with both Council and key community users is required prior to any determination.

IMPACT OF LOSS OF COMMUNITY FACILITIES

Implications of removing a well-used sports ground

Across the City of Parramatta LGA, there is a significant gap in open space for formal sport. Council's draft Community Infrastructure Strategy 2019 has identified a significant under-provision of sporting fields in the surrounding area, with demand increasing due to increasing residential densities as recognised in the Central City District Plan. In 2016, population benchmarks indicate that there is a current deficit of 85 hectares of sports field space. By 2036, population projections push this deficit up to 316 hectares.

The Sydney Olympic Park Authority Plan of Management 2010 (SOPA POM 2010) states the role of the authority in *"managing Sports and Recreation Parks is to encourage, promote and facilitate active recreational pursuits in the community..."* Further to this, the objectives of the POM stipulates that the authority is to *"improve, develop and maintain the land in ways that facilitates public use and enjoyment of the land for sporting purposes"*.

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The removal of three sporting fields in order to provide space for an elite focussed NSW Cricket Centre will significantly reduce the availability of local sporting fields and directly displaces the Newington Gunners Soccer Club (GSC), contrary to the objectives and purpose of the Authority in management of Sports and Recreation Parks.

Understanding Alternative Sporting Locations

The SEIA notes the proximity of some other open spaces in the vicinity of Wilson Park, being: Blaxland Riverside Park, Newington Reserve, Silverwater Park, Halvorsen Park, and Eric Primrose Reserve. Many of these open spaces are cut off from the catchment area that Wilson Park serves, due to the position of arterial roads and waterways. Others are managed by agencies other than Council, and have opening and closing times, or costs associated with access.

The SEIA does not fully address the implications of removing publicly accessible open space specifically community sportsgrounds/fields. It only lists nearby parks in the area, none of which can accommodate community sport in a meaningful way that could offset the loss of these facilities. This is especially important in the context of increasing densities in both Wentworth Point and Sydney Olympic Park.

In this regard, an assessment of nearby community accessible sportsgrounds facilities and their capacities should be undertaken to understand other potential grounds which may be utilised by community clubs in place of Wilson Park. This should be undertaken in the context of increasing densities. Eric Primrose is the only ground considered within the vicinity of Wilson Park throughout the SEIA.

Further to the above, the proposal should include comment on the following document *Valuing our Green Spaces: A Social Return on Investment (SROI) evaluation of parks and sportsgrounds in City of Parramatta, City of Parramatta 2018*.

Economic impact of replacement of a sports ground

The potential cost to Council of acquiring land to provide additional open space is significant. Current estimates of the costs associated with acquiring land for the purpose of sportsground provision are significant. Currently budgeted projects planned in City of Parramatta indicate the scale of cost as follows:

- New sports field, inclusive of two new full sized fields costed at \$4,150,000
- Upgrade to sports field: \$3,112,500
- Upgrade to sports field (just playing surface): \$2,075,000.

Engagement with existing sportsground users

Section 8.2.4 of the SEIA notes engagement with the sports group users of Wilson Park, being the Newington Gunners. The report does not detail the nature of the discussions with this sporting group, however, it is noted that the submission from the Newington

Gunners highlights the lack of consultation, which should be considered by the Department in their assessment. The report notes that the Newington GSC are to be relocated to Eric Primrose Reserve.

This Reserve is already used for formal sport for 24 hours per week, which according to benchmarks for ideal weekly usage, classes it as "operating above capacity." The additional usage of Eric Primrose by The Gunners, which can only be accommodated for the 2020 season, will put further strain on existing resources for community sport and is not on a viable long term solution.

Submission from the Lord Mayor

It is noted that separate correspondence from the Lord Mayor's office has also been submitted regarding the loss of community facilities and relocation of the existing sporting group/s on this site.

Summary and Recommendations

The impact of the displacement of an existing and established sporting group from Wilson Park to make way for a regional facility is a significant impact of this project. Page 41 of the SEIA notes a potential mitigation measure as "to enhance the positive impacts of the proposal by ensuring that the site is accessible to the broader community during the operational phase."

To offset the loss of the existing sporting fields at Wilson Park, the community oval and indoor/outdoor cricket nets should be made available for use by both local Cricket Clubs, and the community (including other sporting groups). The Plan of Management should be updated to include provisions that clearly demonstrate community and local Cricket club access to these facilities. It is also requested that Cricket NSW be required to enter into a Memorandum of Understanding with Council to secure a reasonable level of community and club access to the proposed 15 x indoor/71 x outdoor cricket nets and community oval.

Ensuring that the new facility can be used by the broader community, including sporting groups, for a reasonable period of time each week could mitigate the impact of the removal of an active sports field from the current network. This should be given more detailed consideration together with specifications of when and for how long the site can be accessed.

In addition to this, Sydney Olympic Park Authority should consider what other land it has available that could be allocated to community rather than elite sporting uses to address the long term impacts of the loss of these sporting facilities. Whilst elite facilities are important, directly accessible facilities have the most immediate and direct benefit to the general community.

BIODIVERSITY & HABITAT

The site has a high level of disturbance having been previously cleared, with the existing vegetation to be removed consisting predominantly of landscape tree plantings that provide limited habitat value compared to higher quality vegetation and wetlands at nearby Newington Nature Reserve and Blaxland Riverside Park.

The accompanying plans and reports are supported in principle with the following recommendations:

- Existing trees, assessed by the Project Arborist (minimum AQF Level 5) as having a medium to high retention value, should be retained where possible (particularly semi-mature and mature trees) and collaboration between the Landscape Architect and Project Arborist is recommended to make the final determination in relation to existing tree retention.
- The Landscape Report is required to provide an integrated approach with the Project Arborist and Ecologist for the proposed landscape embellishment to the site. This should be supported by underpinning detailed Landscape Plans for all landscape works. **Note:** Landscaped areas and proposed tree planting should consider the stormwater drainage for the site.
- Tree removals are to be offset by replacement plantings to maintain canopy cover and these are to utilise species from endemic vegetation communities to maximise future habitat value.
- A number of hollow-bearing trees also occur within the site that provide important habitat that cannot be immediately replaced by the planting of new trees as they take many years to form. The loss of hollow bearing trees is a 'key threatening process' and the removal of hollow-bearing trees is to be minimised and offset through the installation of appropriately located nestboxes.
- A recommendation is made to engage an AQF Level 5 Consulting Arborist to provide advice as to suitable locations and planting distances for large trees to minimise risk to high pedestrian zones and impacts to infrastructure;
- The engagement of a AQF Level 5 Arborist ('Project Arborist') to provide an Existing Tree Protection Plan to incorporate tree protection measures in accordance with AS4970-2009 (Protection of Trees on Development Sites) and a Tree Removal Plan.
- The Project Arborist must supervise all constructions works, including demolition and site management, within five (5) metres of any existing tree to be retained.

TRANSPORT PLANNING

The SEARS includes the following consideration:

- *Address linkages with surrounding public space networks, including Silverwater Park and Sydney Olympic Park, and the maintenance and enhancement of the foreshore shared path and its safety.*

In regard to the above, the following matters should be addressed:

1. The new pedestrian link along the southern boundary is supported, however on the western boundary it is preferred that the pedestrian path be adjacent to the road to benefit from street lighting and public safety, this path is to be either in addition or instead of the proposed.
2. The preferred masterplan does not enhance the foreshore path aside from what looks like exercise equipment. With the volume of pedestrians and cyclists, particularly the extra activity this development will generate it is critical that the foreshore path separates pedestrians and cyclists as per Austroads guidance.
3. It is unclear if the proposal affects the on road bike lanes either side of the bus lanes to the south. Further clarification must be provided on this matter to ensure appropriate maintenance of existing bike lanes.
4. With the increased activity and access at the end of Newington Road, it is unclear how pedestrians and cyclists will be safely connected into the existing network. Further detail is required to ensure the safety of pedestrians and cyclists.

It is noted that cyclists and pedestrians are currently required to traverse the existing carpark and access road to connect between Silverwater Bridge (Clyde St) and the river foreshore pathway. The reconfigured carpark needs to provide for a safe pedestrian / cycle connection between Clyde Street (Silverwater Bridge) and the river foreshore to minimise the potential for conflicts with the increased number of cars and buses that will utilise the carpark.

URBAN DESIGN & AMENITY MATTERS

Foreshore Amenities

The existing foreshore amenities building provides important toilet and water facilities that are used by an increasing volume of cyclists and pedestrians using the Parramatta River Walk between Parramatta Park and Sydney Olympic Park. However, the existing amenities building is visually intrusive and is of a scale and location that limits important opportunities for riverfront activation. Whilst publicly accessible toilet facilities are to be provided within the cricket centre buildings, these are visually and physically disconnected from the foreshore pathway and the existing amenities building should be replaced with a smaller proposed built toilet facility to retain and improve existing amenity as well as better integrating with the proposed foreshore recreation facilities. Water bottle refill facilities are also increasingly popular with users of the cycleway and also need to be provided at this location.

Lighting

The use of the proposed community oval and external cricket nets will be limited to during daylight hours due to lack of lighting. This restricts opportunities for the community to

access these important recreational facilities during peak evening use periods (6pm – 10pm) and outside of elite training (9am- 5pm). Floodlighting at an appropriate level for training should therefore be provided to both the community oval and external cricket nets to maximise capacity and availability of these facilities to the local community during facility opening hours. This is consistent with Councils draft Community Infrastructure Strategy and Cricket Australia's Community Cricket Facility Guidelines that recognise the importance of good lighting for local sport *as it provides more opportunities to train and play, and assists to maximise the use of facilities*. The lighting would need to be designed to minimise overspill into nearby wetlands; however, would not be likely to have a significant impact on local fauna (including threatened species) that would have likely adapted to the existing sporting field floodlighting.

Foreshore Access

Accessibility along the foreshore has not been adequately addressed. The river edge should be publically accessible 24/7 publically accessible with a min 20m wide easement for public usage.

Contextual Matters

The following matters should be considered in the assessment of the urban design context of the site:

- The proposal should describe and quantify space and amenity currently publicly accessible, including adjacent amenity; demonstrate what is being reinstated and/or improved.
- Demonstrate the extent of cut/fill required to achieve the proposed levels. Potential for any new ground capping (pg. 53 UD Report) risks raising of levels, which should be confirmed before any final decision is made - as new levels may impact on available buildable area, retention of exiting vegetation, alteration of overland flow.
- The functional relationship diagram should be been re-tested against site constraints as they become known and finesse program to take better advantage of topography, overland flow, irregular site shape
- The Urban Design Report states that the built form 'responds to surrounding warehouse character and internal function' (UD report pg. 24), and provides limited commentary regarding how functional relationships can better integrate with topography, overland flow, irregular site shape; which was also requested by State Design Review Panel.
- Practice nets and associated fencing at the rive edge suggest private property (for example, the fencing suggests "Keep Out", "Members Only"). This does not provide a welcoming narrative at this public edge and indicates a lost opportunity for perceived passive surveillance of river edge.

TRAFFIC MATTERS

Parking Impacts

The Traffic Impact Assessment (TIA) estimates that the proposed development peak parking demand would be 175 spaces and 188 spaces during normal weekday and weekends respectively. Given that a total of 221 car parking spaces will be provided, the TIA concludes that the site will be capable of accommodating all parking demands under normal weekday and weekend conditions. In addition, the TIA indicates that the peak parking demand for special events (i.e. either fan event days or matches hosted at the ICC compliant cricket field, which may draw a peak attendance of 1,500 people on-site) would be maximum 500 spaces. The report, then, states that **parking capacity will be increased to include adjacent Council car park (89) spaces** and junior oval (~250 spaces). The report also mentions that suitable public transport strategies should be pursued by preparing and implementing a Green Travel Plan to promote event specific measures to increase uptake of public transport services.

Although, the TIA shows that the peak parking demand associated with special events can be accommodated without reliance on on-street parking or other parking facilities provided within Sydney Olympic Park, **the reliance on the adjacent Council car park during the special events is not acceptable**. For this reason, it is recommended that an Event Traffic Management Plan be prepared for the events with 1,000 attendances or more in order to minimise the use of the Council Car Park during the major events.

Parking Design

The dimensions of the parking spaces (including the accessible parking space), aisle widths and access driveways has not been shown on the submitted plans. The design of the car parking facility is to comply with the requirements of the Australian Standard AS 2890.1:2004.

Encouragement of Alternate Connections

The proposal should consider options to encourage/support future public transportation access/connections – PLR2 or its alternative; Silverwater Metro service portal as potential future metro station; more detail regarding current bus routes and options to supplement with local shuttle service to existing SOP Station; existing and planned bike routes.

Traffic Conclusion

No objection is raised to the proposed development in terms of traffic and parking subject to the implementation of a Green Travel Plan and providing an Event Traffic Management Plan for the events with 1,000 attendees or more. The above matters should be addressed within the future *Response to Submissions* documentation.

STORMWATER AND CATCHMENT MANAGEMENT

Council's Development Engineer has reviewed the submitted documents and the following comments are made.

1. The stormwater drainage and reuse system needs to also consider the SOPA Stormwater Management and Water Sensitive Urban Design Policy. Provision shall be made to ensure that the development is compliant with the Policy requirements including:
 - a. Providing an integrated water cycle management plan including a water balance report to ensure that the harvest and reuse of roof-water is maximised to meet the development's non-potable water demand (e.g. toilet flushing, watering for landscaping, pitches, etc.)
 - b. Minimising volume and frequency of stormwater discharge from hardstand areas which in lieu of OSD could be achieved by alternative pavement treatments in new hardstand areas and increased stormwater harvesting and reuse,
 - c. Providing an establishment, handover, operation and maintenance plan for WSUD assets.
2. The post development flood scenario should not consider the contribution of pipe unblocking to mitigate the development's flood impact.
3. The flood impact assessment must be expanded to detail measures to address the flood risk of the development including evacuation, fencing and signage.
4. Any bridges or culverts over the overland flow channel should consider potential for blockage in accordance with Australian Rainfall and Runoff (AR&R) Guidelines and also provide a reliable evacuation path to an area of refuge above the PMF.
5. The flood impact assessment must also consider potential increases in flood velocities and hazard, particularly consequences for the existing leachate ponds, and provide appropriate mitigation measures. This should be coordinated with the geotechnical and contamination consultant to provide a coordinated solution for the channel outlet which includes details of the channel outlet and receiving system downstream to the point of discharge in the Parramatta River to be shown on the stormwater drainage plans.

CONTAMINATION

The main aspect of concern with this development is the management of contamination known to be present at the site and the assurance that there will be no new exposure pathway created as a result of this development. The basic requirement being that the existing contamination containment measures at the site are at a minimum maintained or ideally enhanced through this development.

Following review of the relevant contamination reports, the Site Audit Report and Site Audit Statement, Council's Environment and Health Team are satisfied that the above outcome of an enhancement to the current contamination management status can be

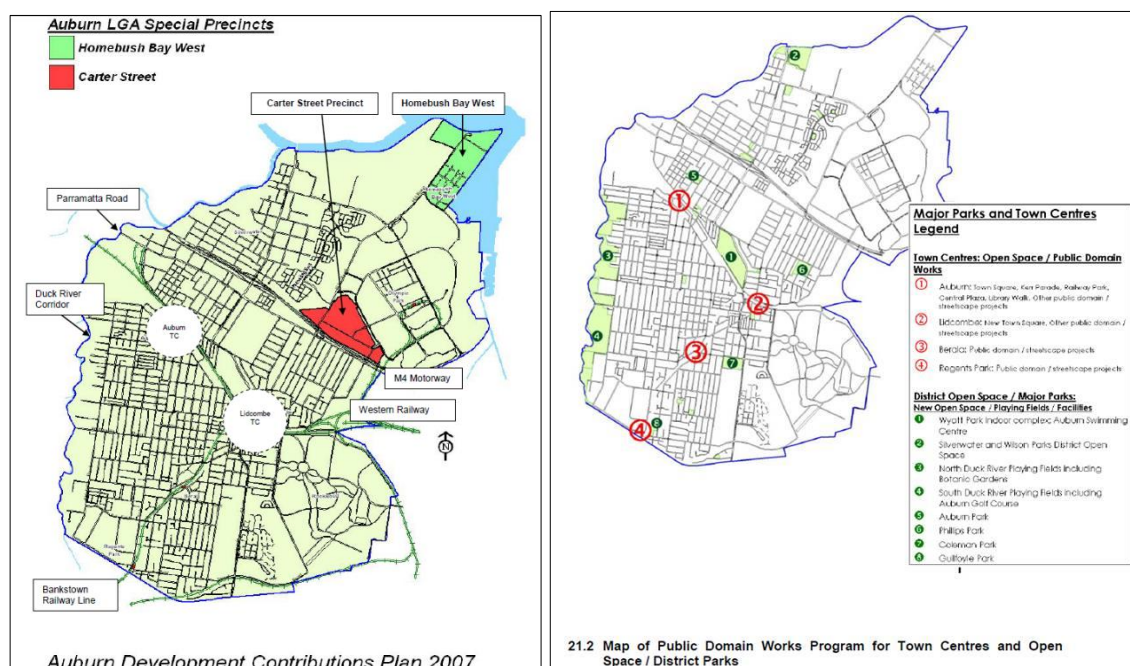
achieved, provided that the conditions included in the SAS are adhered to and the long-term environmental management plan (LTEMP) is conducted as indicated.

It is recommended that a covenant on the title of the land be placed that makes reference to any LTEMP produced in association with this development to ensure that it is carried out in perpetuity.

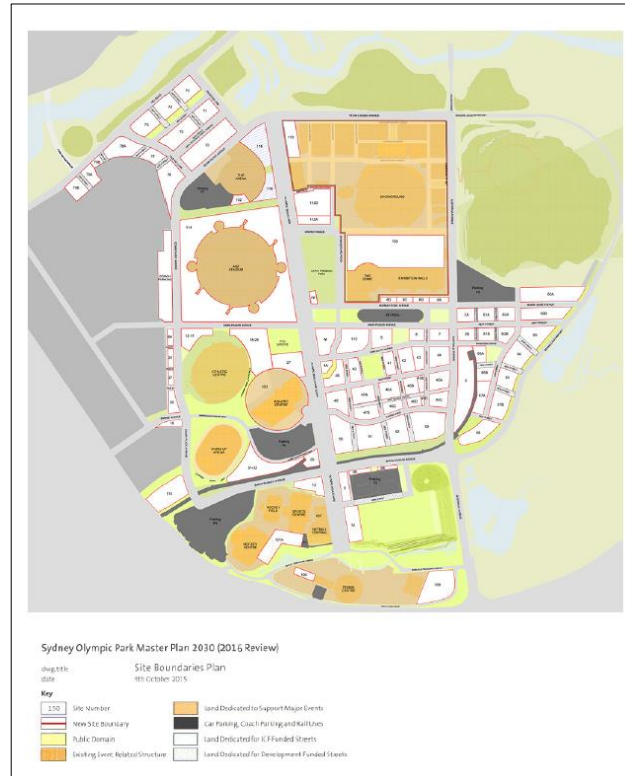
It is also expected that any alterations to previous conclusions on the status of the contamination will trigger further investigation and audits over and above the additional validation audits required under the Contamination Management Plan and with reference to the Hazardous Ground Gas survey that also may be required.

DEVELOPER CONTRIBUTIONS

Whilst it is noted that the administration and maintenance over Wilson Park was transferred to SOPA in July 2019, the site is still subject to the current version of the Auburn Contribution Plan 2007 (Amendment No. 1) as shown in the below application maps.



In addition, from reading the latest revision of Sydney Olympic Park Local Infrastructure Contributions Framework (ICF), it is also noted that the boundary of the land applicable to the plan does not include Wilson Park, as it was last amended in October 2017.



As a result of the above findings, Council officers seek to confirm that developer contributions are to be paid to Council under the Auburn Contribution Plan 2007 (Amendment No. 1) and request details as to how the proposal will contribute towards local infrastructure improvements.

Council appreciates the opportunity to comment on the above application and looks forward to further consultation on this matter.

Should you wish to discuss the above matters, please contact me direct on 9806 5393 or at klafferty@cityofparramatta.nsw.gov.au

Yours sincerely



Kate Lafferty
Executive Planner
City Significant Development