

11 July 2018

Aditi Coomar
Department of Planning and Environment
320 Pitt St
Sydney NSW 2000

Dear Aditi

Re: EIS Submission Sydney Football Stadium

The Centennial Park and Moore Park Trust (the Trust) is making this submission in response to the public exhibition of an application for Stage 1 of a State Significant Development (SSD), being the demolition and redevelopment of the Sydney Football Stadium, proposed by Infrastructure NSW (INSW).

With respect to the exhibited Environmental Impact Statement (EIS) and related documentation for this Stage 1 application, the Trust makes the following comments and recommendations - including raising a number of concerns - which should be addressed during the assessment and ahead of any further detailed design associated with Stage 2 of the SSD application.

This submission is structured against key documents submitted in support of the SSD, namely the Urban Design Guidelines, Construction (Demolition) Management Plan, Infrastructure Management Strategy, Design Excellence Strategy and SEARs.

1. Urban Design Guidelines

The Urban Design Guidelines are detailed, comprehensive and are largely complete. It is clear the authors have interrogated and understood the ideas and strategies documented in the Moore Park 2040 Master Plan.



The Trust would expect to see the following issues resolved or addressed more specifically in any Stage 1 approval or Stage 2 application:

1.1 Security and Hostile Vehicles

- a) The mitigation against hostile vehicle attack and creation of stand-off distances to keep potential threats away from buildings and people is raised in the Guidelines. This must be a precinct-based approach incorporating all of Driver Avenue and not deal with the SFS as a single, isolated venue. 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), Royal Hall of Industries (RHI) and the Hordern Pavilion (HP) are addressed at the same time to avoid potentially intrusive measures being replicated around each venue. The approach to entertainment venues typically adopts two lines of defence - an inner and outer cordon. More work is needed from specialist, but the western side of Driver Avenue appears to be a logical place for the outer cordon in event mode, thus protecting pedestrians using the road space in event mode.
- b) The key attributes of the Centennial Park and Moore Park Trust's 'hostile vehicle business case' should be included within the project.
- c) The Urban Design Guidelines should take into account two recent security documents, one jointly published by the Australian and New Zealand Governments, and the second published by NSW Police. These documents should be referenced in the Guidelines - and the inner and outer cordons should be specifically diagrammed on a plan on page 117. The current draft guideline for Safety and Security requires further enhancement in this regard. The extent of this drawing should capture Driver Avenue, the SFS, SCG, HP and RHI.

1.2 Future links to Fox Studios and Entertainment Quarter

- a) The Guidelines make several mentions of the opportunity for the redevelopment of the SFS to establish important connections, or at least to safeguard the opportunity to create such connections in the future. Moore Park 2040 raises the potential for a north-south link from Paddington Lane, alongside the SFS, through the concourse of the SCG (when the Messenger Stand is redeveloped), to the Victor Trumper Stand public concourse, and then via a bridge across Fox Studios' access driveway, and into the Entertainment Quarter. This link is partly indicated in the Guidelines - in the immediate vicinity of the SFS - but should be described more explicitly and consistently at pages 33, 54, 76, 86 and 104 and in the corresponding diagrams.
- b) Moore Park 2040 also raises the opportunity for a second, east-west link, which would run between the SCG and SFS, and - at a suitable point in the future - connect directly into the heart of the Fox Studios precinct, on the alignment of Chips Rafferty Avenue. The potential for this future link should be described more explicitly on pages 33, 54, 76, 86 and 104 and in the corresponding diagrams.

- c) In describing these potential linkages, the Guidelines should also elaborate on appropriate levels and tie-in points (referencing existing concourse levels, the Bradman Terrace level, Paddington Lane levels and so on) so the future detailed design can deliver a clear, legible and accessible network of linkages.

1.3 Pedestrian linkages and lighting in Moore Park

- a) The Guidelines highlight the need to link the SFS redevelopment to recent and current projects in Moore Park - specifically the Tibby Cotter Bridge and the new CBD and Southeast Light Rail stop in Moore Park south. However, the Guidelines appear to stop short of making any specific commitment to design or delivery of these links. This may be partly due to the desire to not be seen to be 'taking over' control of CPMPT land beyond the SFS site. The stadium project cannot be developed successfully without this connecting infrastructure being delivered concurrently with the SFS redevelopment. The Light Rail project also has commitments to design and deliver its connecting infrastructure, yet no detail of the final proposed design is reflected in the Guidelines.
- b) The Trust invites close consultation and a joint design workshop forum between INSW, CPMPT and other stakeholders in the precinct to resolve the form and detail of these critical links. In this way the applicant is not seen to be speculating on proposals beyond the subject site, but can make a commitment to their design and implementation. Such a recommendation would sit comfortably in the Guidelines at pages 32, 33 (where the pedestrian link indicated across Kippax Lake should also be amended), 42, 43, 44 (particularly in the final paragraph), 63 (as part of peripheral works), 85, 102 and 103.
- c) Pedestrian flows and lighting across Moore Park to the Moore Park Light Rail stop need to be carefully considered in both shorter and longer term scenarios. The current design diagrams indicate a primary stadium entry and concourse addressing Driver Avenue at the northern end of Kippax Lake. This means many patrons will need clear decision points when arriving or leaving the precinct. Existing footpaths are inadequate and do not anticipate the Moore Park Light Rail stop, and also do not yet adequately connect to the Tibby Cotter Bridge.

1.4 Waste management in Moore Park

Waste management during event mode is a significant environmental issue for the precinct and needs to be addressed in more detail in the Guidelines. Patrons exiting the stadiums should pass well-designed, well-sited waste disposal opportunities, which should be resolved on a precinct-wide basis during preliminary design.

1.5 Cycle facilities in Moore Park

The Guidelines make provision for the design and siting of bike racks. Again, a more strategic precinct-wide approach is required to ensure that unnecessary duplication of bicycle facilities is not promoted at each individual venue along Driver Avenue, potentially contributing to unnecessary clutter in the public realm. A strategic approach would potentially allocate a smaller component of

cycling facilities at each venue with the balance strategically located across Moore Park east to serve all venues in the vicinity. In line with recommendation 3b) above, the Trust invites a joint design workshop forum to resolve the optimal solution for precinct-wide cycle facilities.

1.6 SFS project exclusions

On page 31 of the Guidelines, there are two design elements specifically excluded from the proposed scope of work. These exclusions were emphasised by INSW at a presentation to the Trust on 8 May 2018. However, the Trust would expect the redevelopment of the SFS will contribute to the design and delivery of an integrated public realm within Moore Park east.

The stated project exclusions are:

- a) The pedestrianisation of Driver Avenue
- b) Removing “on-grade” event parking from grassed areas

The Moore Park Master Plan 2040 calls for the management of Driver Avenue during event days as a pedestrian space - but specifically does not anticipate the permanent pedestrianisation of the full length of Driver Avenue. To this extent, the Trust does expect the redevelopment of the SFS will contribute to the anticipated outcome.

Further, on page 26, ‘Outcomes from Consultation with Centennial Parklands and Moore Park Trust’ the Guidelines state ‘Close Driver Avenue...as a shared vision between CPMPT and SCG’. This statement needs to be modified to acknowledge the ambition for the flexible use of Driver Avenue. It then follows that the Trust and INSW should work cooperatively to resolve, design and deliver the public realm treatment for at least a northern portion of Driver Avenue as part of the SFS redevelopment. To ensure the proposed public realm design treatment for Driver Avenue is consistent for its full length, any design solution for the northern portion should be able to be implemented in the future along the remainder of Driver Avenue.

Similarly, the Moore Park Master Plan 2040 forecasts the progressive reduction in event day “on-grade” car parking at Moore Park east, and the return of this area to green open space. The redevelopment of the SFS should therefore contribute to the progressive, staged reduction in event day parking on grass. Given the SFS redevelopment will contribute to improved pedestrian links across Moore Park - to connect to Tibby Cotter Bridge and the new Moore Park Light Rail stop - it seems logical for these works to also contribute to a measured reduction in “on-grade” event day parking.

The proposed redevelopment of the SFS also involves the reconfiguration of MP1 and the introduction of the basement parking. As a result, it should further contribute to a net reduction in the extent of parking in the precinct, particularly given the favourable timing associated with the introduction of the CBD and Southeast Light Rail.

1.7 Categorisation of Driver Avenue

At page 52, in the section dealing with lighting and safety, the Guidelines state:

'Driver Avenue itself is a significant hazard. Not classed as a road under the NSW Roads Act 1993, the road material is inconsistent and features no formal pedestrian crossings. Moore Park Road also features no pedestrian crossing points especially in between Anzac Parade and Oatley Road. On event days, patrons can be seen running across the road due to the lack of formal crossing point.'

This section of the Guidelines appears to conflate issues faced at Moore Park Road with those at Driver Avenue. This is confusing and should be amended generally in line with the comments above.

1.8 Understanding place

Pages 17 and 18 within the Guidelines describe Driver Avenue and Entertainment Quarter as 'lacking character'. This statement could be misinterpreted. A more accurate statement would be to say these places often 'lack activation' outside of event mode.

2. Construction (Demolition) Management Plan

2.1 Extent of construction works

The site boundary adopted throughout the EIS documentation shows the general extent of proposed construction work, but the Trust seeks to clarify if this includes or excludes the eastern footpath along Driver Avenue. This footpath is under the care, control and management of the CPMPT, however the drawings seem to indicate the footpath will be incorporated as part of the construction works zone.

2.2 Ongoing events at Moore Park

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

Similarly, some members of the SCG may expect access to car parking during events at the SCG. It is not clear how this will be addressed during the demolition and construction phase.

2.3 Construction vehicle management

To maintain ongoing operational capacity in Moore Park, the Trust expects Driver Avenue will not be used for staging vehicles waiting to access the construction site. All construction vehicles should be accommodated within the construction works zone and not overflow into Driver Avenue or surrounding streets and roads.

2.4 Ground water impacts

The Construction (Demolition) Management Plan identifies that 'no piling or excavation works will be undertaken as part of the (Stage 1) works'. In any case, future Stage 2 works will likely involve

excavation and piling, and the Trust will be concerned for any potential impact to ground water given this ground water forms part of the urban catchment that sustains the Lachlan Swamps, important to the ecological health of nearby Centennial Park. Additionally, the Trust currently depends on ground water bores in Moore Park for irrigation.

Consequently, the Trust raises the forthcoming need for an appropriate ground water assessment conducted in terms of water table levels and considering any potential impacts of construction.

2.5 Legislative requirements

The Plan lists a number of applicable acts and regulations, but this list will need to also specifically include the *Centennial Park and Moore Park Trust Act 1983* (CPMPT Act) and CPMPT Regulations as construction traffic will most likely be entering the proposed construction zone along Trust roads (Driver Avenue is not a gazetted road). This will apply to any works in both stages of the project.

2.6 Erosion and sediment control

The Plan states that during proposed construction works, existing stormwater infrastructure will be utilised during excavation and clearing works, with the addition of an on-site detention tank that will have a pump connection to the existing stormwater infrastructure. Based on the stormwater report, this will connect to existing lines, some of which feed a number of the ponds in Centennial Park. Incoming water quality in Centennial Park is critical to the ecological health of the ponds, and further assessment of any impacts and their mitigation is necessary.

2.7 Dilapidation due to construction vehicle access

Driver Avenue is nominated as the favoured route into the construction works zone. While the document suggests there is to be no staging, marshalling or queueing along Driver Avenue, a total of approximately 9,000 heavy vehicle movements are estimated to take place during the proposed demolition works. The Trust requests a full dilapidation report for Driver Avenue and the immediate surrounds, including footpaths, between Moore Park Road and the turnaround circle adjacent to Fox Studios entrance.

3. Infrastructure Management Strategy

3.1 Potable water

The Trust notes the identification of an existing 200mm water main along Drive Avenue. The Trust also anticipates this to be a Sydney Water asset and is unlikely to impact upon Moore Park. If however, detailed Stage 2 design indicates there are issues associated with the proposal for the main supply to be drawn off Moore Park Road, then alternatives may require trenching and associated works in the Driver Avenue corridor. The Trust expects this issue will require clarification and approval.

3.2 Bore water

The Strategy identifies the possible use of bore water. Moore Park depends heavily on bore water for irrigation, and notes that any additional bores proposed to support the construction or operation of the redeveloped SFS may impact on water availability (depth of water table). Any proposal for bores to be sunk in the SFS site area - either temporarily or for permanent use - must be assessed against the total number of operational bores in the area, and demonstrate no adverse impact on the CPMPT operations. This issue also applies to points raised in the stormwater report (see below).

3.3 Fire services

The Trust anticipates no specific impacts on Moore Park operations as result of the proposed installation of fire mains. However, the earlier points raised under potable water remain relevant. The final location of any necessary pumps and boosters identified in the detailed design of Stage 2 will require NSW Fire Brigade endorsement and approval. This extends to include possible emergency vehicle access (which may conflict with hostile vehicle mitigation measures), and in some scenarios, may potentially impact upon Driver Avenue, requiring close consultation with the Trust.

3.4 Stormwater and flooding

The Strategy aims to detain stormwater on site, and as such there do not appear to be impacts on Trust land. The report however, requires some amplification.

It is important to understand how the flood study and predicted overland flow from the redeveloped SFS may impact Trust land and Driver Avenue. No mention is made in the report of the cumulative impacts created by the light rail construction along Anzac Parade. The Trust notes that Transport for NSW conducted its own flood study at Moore Park as part of its design and construction approvals.

Additionally, as noted earlier, any bores proposed within the SFS site - either temporary or permanent - must be assessed against the total number of bores in the area to mitigate against any impact on Trust land. This point is also discussed in response to the Construction (Demolition) Management Plan.

3.5 Waste water and sewer

The Strategy identifies the main sewer line for the existing stadium (and for the SCG) runs along Driver Avenue and will require augmentation. This will require significant works and provision for make good, including trenching and road closures or restriction, depending on where the underground services run, and may also impact Moore Park south depending on the extent of works necessary to augment the sewer service. This issue will require clarification and discussion with the Trust.

3.6 Gas

There are existing connections to the gas supply along Driver Avenue, but it appears that the new stadium will connect to lines along Moore Park Road. Final design in Stage 2 may require works in

Driver Avenue – outside the identified construction zone. This issue will require clarification and consultation with the Trust at the appropriate time.

3.7 Telecommunications

While no adverse impacts have been identified, the main telecommunications services run along Driver Avenue. There may be a need to undertake pit and pipe trenching work in Driver Avenue if required with the roll-out of the NBN. Consequently, an application may need to be made to the NBN for site connectivity for those tenants not currently supported by the SCG network. This issue will require clarification and consultation with the Trust at the appropriate time.

3.8 Noise and vibration impact

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

4. Design Excellence Strategy

CPMPT is keen to ensure that the proposed Design Excellence Strategy realises the level of design quality expected of a development of this proposed scale and significance.

The Strategy describes a competitive design alternatives process, similar to that typically undertaken in the context of the City of Sydney. However, there are a number of competition parameters identified within the Strategy that could be improved in order to achieve design excellence.

The specific competition parameters which could be improved include:

- a) The process should consider more than three competing design teams, preferably five;
- b) The competition timeframe could run for longer than the proposed 28 days, preferably 60 days;
- c) The competition design brief could include more of the site elements than simply stadium facade and roof elements; and
- d) The jury should include an odd number of jury members, preferably five, to assist in decision making.

5. SEARs

The SEARs, issued on 3 May 2018, are generally comprehensive and thorough. However, in a number of instances they would benefit from amplification to ensure the statutory planning and development assessment framework is complete.

5.1 Statutory and strategic context

The following environmental planning instruments should be added under Item 1 - Statutory and Strategic Context (pages 1 and 2):

- a) State Environmental Planning Policy 47 - Moore Park Showground
- b) The approved Development Concept Plan for Entertainment Quarter

5.2 Policies

The following policies should be added under Item 2 - Policies (page 2):

- a) Moore Park Showground Conservation Strategy 1995
- b) The Centennial Parklands Conservation Management Plan (both 2003 and 2010 versions)

5.3 Transport and accessibility

The following matters should be addressed under Item 6 - Transport and Accessibility (page 4):

- a) Reference to new transport infrastructure in the precinct, specifically the Tibby Cotter Bridge and the City of Sydney's Moore Park Road cycleway. These projects should be considered in assessing existing facilities and future transport demand
- b) Way-finding strategies should reference work undertaken by TfNSW with the CBD Way-finding Coordination Group, and the Moore Park Transport Plan
- c) The assessment of any proposed roads and driveways should extend to include pedestrian access, and should specifically reference the proposed northern pedestrian entry between Moore Park Road and the Entertainment Quarter, which would likely be integrated with the stadium redevelopment.

5.4 Consultation

The following agencies and authorities should be included under Consultation (page 11):

- a) Centennial Park and Moore Park Trust
- b) Heritage Division of OEH and the Heritage Council of NSW

6. Conclusion

The Trust appreciates the recent positive interactions and consultation with INSW, and has already had the opportunity to relay the majority of concerns and recommendations outlined in this submission directly to INSW.

The Trust anticipates working with INSW towards the satisfactory resolution of its concerns, particularly in the areas of off-site works, the completion of pedestrian linkages and precinct-wide strategies for a number of aspects related to the SFS redevelopment, which are aligned with the Trust's vision for the future of Moore Park.

Your sincerely

A handwritten signature in black ink, appearing to read 'Kim Ellis', with a stylized, cursive script.

Kim Ellis
Executive Director
Botanic Gardens & Centennial Parklands