



THE LORD MAYOR OF SYDNEY
CLOVER MOORE

16 JUL 2018

Karen Harragon
Director, Social and Other Infrastructure Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2000
By email aditi.coomar@planning.nsw.gov.au

Dear Ms Harragon

**Sydney Football Stadium
SSD 9249: Concept proposal and Stage 1 demolition**

I refer to the State Significant Development proposal to demolish the Sydney Football Stadium and several adjacent buildings; to approve a new stadium with 45,000 seats and capacity for 55,000 people at concerts; and to provide concept approval for a building envelope and general functions.

Proposal is not in the public interest

The stadium redevelopment is ***not in the public interest*** and cannot be justified ***economically, socially, culturally or environmentally***.

The State Government's own business case demonstrates that this \$750 million expenditure of public funds will ***not provide a return on investment***.

This stadium will be an ***expanded metropolitan-scale traffic generator***, adjacent to Sydney's central business district in the most densely populated area of Australia, where worsening congestion makes access difficult and ***threatens the economy of our global city***. The City of Sydney area contributes \$125 billion in economic activity, or 22 per cent of the NSW economy. Congestion currently costs metropolitan Sydney \$6 billion a year, which is predicted to rise to \$14.8 billion by 2031.

In 2016, former Premier Mike Baird announced priority for ***stadium infrastructure in Sydney's west***, close to Sydney's centre of population, where the more Sydneysiders can access a stadium without the time and costs of congestion at Moore Park. There is ***no public demand for rebuilding Sydney Football Stadium*** and more than ***200,000 people supported a petition*** against the demolition and seeking ***investment in local community sports and recreation facilities***.

Moore Park is ***vitaly important open space*** to meet the needs of Sydney's increasing numbers of residents and visitors. Nearly 80 per cent of our residents live in apartments at high density and rely on access to public open space for their health and recreation. Demolishing and rebuilding Sydney Football Stadium will ***impact negatively on public open space, tree canopy and air quality***.

Refurbishment is more environmentally sustainable. It retains the significant embodied energy in the relatively-recent stadium and avoids the resource use and greenhouse gas emissions of new construction, especially carbon-intensive concrete works.

The NSW Government made its decision without consultation with the local community and without considering the full range of economic, social, cultural and environmental impacts, especially on Moore Park and adjacent residential areas. This is the **wrong project, in the wrong location**.

The City recommends refusing the proposal in favour of refurbishing the existing 1988 award-winning facility by one of Sydney's best architects, Philip Cox.

Summary of key concerns

I attach the City's submission detailing the **major concerns** with the proposal. In summary, the City objects to this application for the following reasons:

- **The proposal is not in the public interest.** The business case demonstrates the project will have 'negative returns'. More than 200,000 people have supported a petition against the demolition.
- **Impacts have not been accurately presented.** The large proposed stadium footprint means generated activities cannot be constrained on site and will directly impact on Driver Avenue and Moore Park. Despite only a small increase in seating, the proposal is an entertainment venue with expanded capacity and use. The generally low attendance at sporting events will inevitably lead to an expansion of entertainment events to justify the expenditure.
- **Cumulative impacts have not been considered.** The proposal cannot be assessed in isolation and the cumulative impacts on Moore Park and surrounding residential areas have not been properly taken into account. Other proposed significant projects in the precinct include the leased use of the Hordern Pavilion and the Royal Hall of Industries; undisclosed plans to redevelop the Entertainment Quarter, and the Alexandria to Moore Park connector road linking to WestConnex.
- **Demolition must not be approved before impacts are understood.** Immediate demolition appears designed solely to force a stadium rebuild by any future NSW Government, whatever the outcome of the detailed design and assessment. No demolition approval should be given before the public disclosure of a detailed design and clear information on the impacts of a new stadium.
- **The traffic study is grossly inadequate.** There is existing traffic congestion in surrounding areas on non-event days with significant additional impacts on event days due to the large number of car parking spaces available. The application's modelling is done based on arriving traffic, while departure after games or events is more critical due to shorter timeframes. The traffic study seriously underestimates the traffic generated by the size and number of expected events.
- **There is insufficient public transport capacity.** Tier 1 stadium investment of this scale needs dedicated public transport, as exists at Homebush. The new light rail will move, at most, 14,000 passengers per hour. This application should be supported by a metropolitan-wide strategy to deliver people quickly and easily to the stadium by public transport, walking and riding, with a credible action plan to dramatically increase the public transport mode share.
- **On-grass car parking at Moore Park must end.** While the application does not propose new car parking spaces on site, it assumes parking demand will be externalised and met by the Centennial Park and Moore Park Trust. Every event car parking space generates extra traffic and on-grass car parking reduces useable public open space.

- **The oversized footprint on a constrained site risks patron safety.** Exterior spaces need to be well designed for the safety of a large number of patrons entering and leaving at the same time. Site restrictions allow only three unevenly distributed entry points, and the proposed stairs to Driver Avenue present a potential safety hazard for crowds. The proposed new footprint does not achieve a best-practice result for patron access and egress, and imposes on surrounding parkland.
- **All significant trees on the site must be protected.** Moore Park has recently lost too many trees and this application proposes at least 28 more to be cut down, with 15 identified as 'worthy of retention with moderate to high landscape significant'. 'Tree 124' is a significant group of eight Hills Weeping Figs with high priority retention value. The legacy of tree-lined boulevards on Moore Park Road and Driver Avenue would be eroded by the removal of these trees.
- **Further work is needed to reduce construction impacts.** The greatest impacts will occur through use of concrete crushers, excavators and rock breakers during demolition. Air quality impacts will be determined by a 'visual assessment' of dust. There are exceedances predicted for noise management levels and excessive noise levels proposed for the nearby childcare centre.
- **The development cannot be justified environmentally.** Demolition, rather than retrofit and upgrade, is carbon intensive and unsustainable. There is significant embodied energy and environmental impacts of new materials involved in demolishing a relatively recent stadium.

It is essential that the Centennial and Moore Parklands be protected as open, green space rather than suffering the ongoing negative effects of development intensification.

Twenty million people visit the Centennial and Moore Parklands annually, while two million attend the Sydney Football Stadium and Sydney Cricket Grounds. Moore Park is increasingly important to support the growing residential density in surrounding areas. The nearby Green Square Urban Renewal Area will be home to more than 60,000 residents and 20,000 workers by 2030.

This project conflicts with clear State Government directions and objectives in the Greater Sydney Commission's plan *A Metropolis of Three Cities*. It is inconsistent with the directions in the Greater Sydney Region Plan for "a collaborative city working together to grow a Greater Sydney". It emphasises "increased use of public resources such as open space and community facilities".

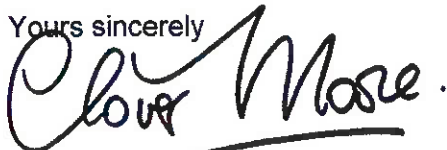
The City of Sydney objects to the proposal

The City objects to the application and seeks its refusal. As this is a State Government proposal being proposed and assessed by state agencies, the City requests that the Minister for Planning delegates determination to the Independent Planning Commission.

The City of Sydney (the City) would be consent authority except for a planning policy under the *Environmental Planning and Assessment Act* (EP&A Act) that declares the works State Significant Development (SSD).

The planning application has been made by Infrastructure NSW, which has been authorised to undertake the planning, procurement and delivery of the Sydney Football Stadium replacement. ***The City requests that the NSW Government confirm an appropriate agency to provide the independent assurance role normally done by Infrastructure NSW.***

Yours sincerely



Clover Moore
Lord Mayor of Sydney