

17 August 2016

Major Projects Assessments
NSW Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

Staged Development Application - Western Sydney Stadium (Concept & Stage 1 Demolition)

The National Trust makes the following submission on the State Significant Development proposal for a staged Development Application for the Concept Plan for a new Western Sydney Stadium and the demolition of the existing stadium.

This development proposal is within Parramatta Park which was formerly the Governor's Domain, land set aside by Governor Phillip in 1788 to supply the colony's farming needs. As the Governor's Domain, the grounds were much larger than the modern day Parramatta Park, extending from Parramatta Road to the south, evident by a small gatehouse adjacent to Parramatta High School. Over time parts of the domain were taken over to make way for Parramatta High School, a golf course, the Western (railway) line, Parramatta RSL and Bowling Club, Parramatta Swimming Centre, and the Parramatta Stadium. The most significant loss of land was the eight hectares to the Parramatta Stadium Trust for the Parramatta Stadium.

It became a public park in 1858, one of the earliest in the world.

Parramatta Park, Former Governor's Domain was listed on the Register of the National Trust in May, 1978 as one of the most historic urban parks in Australia. On the Listing Report the Trust noted that Parramatta Park, its landforms, landscape and remaining historic buildings and monuments retain the potential for this remarkable domain to regain its once fine visual status.

The Trust further noted –

"There exists with this park a unique opportunity for skilful reinstatement of a very fine urban landscape with a status and management comparable to that of the Royal Botanical Gardens and Centennial Park. It is essential to preserve landscape features of particular importance such as the Crescent with its close links with the early settlement of the Parramatta area. Further alienation must be prevented and every effort should be made to progressively phase out those alien uses as leases expire."

A Permanent Conservation Order was placed on Parramatta Park and Old Government House in June 1989 and this place was listed on the State Heritage Register in April, 1999.

Old Government House and the Government Domain were listed on the National Heritage List in August, 2007 and Old Government House and Domain was listed on the World Heritage List in July 2010 as one of eleven sites across Australia that form the Australian Convict Sites World Heritage Property.

In 1979 there was considerable public and Trust opposition to the State Government's approval in principle of a 40,000-seat football stadium at the oval, major problems being traffic, access and parking. The historic urban



park was suffering from neglect and far too many alienations but the Government passed the Cumberland Oval Act of 1981. The Trust stated: *'It made a mockery of the Government's own planning procedures...'* and in the Trust's 1979-80 Report added *'...the Government accepted the vote-catching Parramatta Leagues Club proposal without holding an open inquiry'*.

In late 1981 the Trust and others placed their objections before the Land and Environment Court. The Court decision of March and a Supreme Court appeal in September declared the local Council's decision to permit construction as null and void. In December 1982 the State Government resolved to approve a 30,000 seat stadium project which would be exempt from the provisions of the Environmental Planning & Assessment Act. *The Sydney Morning Herald's* editorial of 13 December in reviewing the proposal stated: *'The Government's alleged commitment to environmental protection must now be considered thoroughly suspect...'* and quoted Tom Uren MP as stating it was: *'an act of political, environmental and urban vandalism.'* In February, 1983 the Chief Judge of the Land and Environment Court was reported as criticising the State Government for the proposed legislation, which would have the effect of overturning his judicial decision. A further *Herald* editorial of 15 March again was critical of the Government's actions but the controversial amendments to the Cumberland Oval Act were assented to on 4 May, 1983.

In June 2016 the NSW Government announced the construction of a new stadium to replace the existing stadium in Parramatta Park.

The proposed stadium has the potential to severely impact on the Parramatta Park broader landscape and on the views from Old Government House which form part of the World Heritage Listing.

The Historical Heritage section of the Environmental Impact Statements notes that the concept proposal has the potential to significantly impact the heritage values of Old Government House and Domain and Parramatta Park both directly and indirectly.

The National Trust believes that there should be no increase in built form in the original boundaries of Parramatta Park.

If the facilities at the Parramatta Park Stadium are now inadequate then a permanent move to the 83,500 seat Homebush ANZ Stadium should be investigated as a more logical, less damaging and less costly alternative. The Parramatta Eels are already a home team at the Homebush ANZ Stadium

Similarly, the Parramatta Football Club should not be expanding its facilities in Parramatta Park but should also be encouraged to relocate to a site at ANZ Stadium Homebush.

The Homebush site is now within the new boundaries of the City of Parramatta and has dedicated heavy rail access and car parking for more than 10,000 cars on-site.

The proposed building envelope for the new Western Sydney Stadium, as indicated in figure 2.3.1, page 10 of the Visual Impact Assessment (Part I) appears to be double the height of the existing stadium.

The rear wall of the proposed stadium will face towards Old Government House and the Governor's Domain World Heritage Site.

The montage images on page 32 of the Visual Impact Assessment (Part II) confirm that the proposed stadium will be highly visible above the tree line and will impact negatively on the views from the World Heritage Area.

The Environmental Impact Statement confirms that this impact will be "high" to "severe".

The National Trust strongly urges that the alternative Homebush site be investigated rather than constructing a new stadium and expanding the Parramatta Football Club premises.



Such a move would allow this important element of Parramatta Park to be reincorporated into the State and National Heritage Listed Areas and to be considered for addition to the World Heritage Area.

Yours sincerely,

Graham Quint
Director - Advocacy