

THE PADDINGTON SOCIETY Inc.
For Community and Heritage
Est 1964

Planning Industry & Environment

24 November 2021

Attention: Karen Harragon

Dear Karen,

**Modification Requests 6 (Building Envelope) and 7 for Sydney Football Stadium
Precinct Village and Carpark Proposal,**

Thank you for inviting our response to this proposal for a 1500 space underground carpark, single storey retail pavilion, four tennis courts and tennis club, and a landscaped green space.

The proposal has many positive benefits:

- The replacement of the current Members' bitumen carpark partly with a landscaped space which complements Moore Park.
- The removal of on-grass parking in Moore Park for events, at least in EP2 (north and south of Kippax Lake), which will return this area to public benefit.
- Increased pedestrian permeability in the Precinct
- Measures to reduce pedestrian/vehicle conflicts on event days

However, we have the following concerns and suggestions to strengthen the parklands character and the public benefit of the proposal:

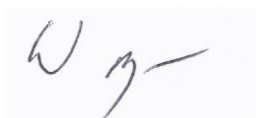
- A firm commitment from Venues NSW is required to remove all on-grass event-day parking, from the rest of Moore Park (EP3), as soon as possible, and by 2024, a year after the completion of Stage 2 of The Precinct Village and Carpark, at the latest. Without this commitment and a specified timeline, parts of Moore Park would continue to degrade. This is at a time when public transport needs to be prioritised and car traffic reduced for a sustainable city. Associated with this, there needs to be a firm commitment to integrated ticketing and the use of satellite parking for events.
- Currently, Centennial and Moore Park Parklands gain some financial benefit from the on-grass event-day parking, in a context of very little direct government funding provided for the Parklands. While we welcome the on-grass parking removal, we recommend that the Parklands continue to share in the revenue generated by the carpark, tennis courts, and retail outlets, which are all situated on Crown land, for the benefit of that public Park.
- Since the development is on Crown Land, we recommend that the Members-only tennis courts, be removed, or at least halved in number and opened for hire by the community. The current proposal effectively sterilises half of the subject site since the tennis courts will only be available for members, are paved in artificial material, and are fenced, restricting the public to narrow circulation corridors. The stated aim of converting the courts to an 'events platform' at times seems unrealistic. The tennis club building, located in the sunniest spot of this area, also appears excessive for four tennis courts, considering the retail pavilion could cater for most needs, and would be better as public open space, for shaded permanent seating. The less built structures in this park setting, the better.

Note that recent approvals for the White City (Hakoah Club) and the Weigall Sports Complex (Sydney Grammar School) on the north side of Paddington were both conditioned to include some community access to sporting facilities.

- The Village Precinct pavilion as currently designed acts as a blank built barrier to spaces to the East, and would be better as an open verandah which opens both to the east and the west. The proposed height of 6m seems excessive for a 1-storey facility. In addition, there appears to be masonry towers (ventilation for the carpark?) at almost 10m above the plaza which have not been well illustrated in 3D views and with no mention of their impact on air quality in this residential precinct.
Additionally, the green roof shown in all illustrations of the proposal does not appear in the Landscape Drawings, and so significantly mis-represents the proposal. If the pavilion is to 'blend in' to its parklands setting, a planted roof is essential, and will improve the proposal's sustainable values. Green paint will not do!
No roof plan has been provided, nor room type details on the Plaza Level floor plan, nor Mechanical Engineering documentation (noted on Landscape Plan LA 201), all serious omissions.
- The proposal's Transport Assessment does not address the impact in either construction or operation of the whole Stadium precinct of non-resident parking in local streets. Such parking should be assessed, discouraged and policed.
Although the proposed management of the Precinct carpark aims to discourage commuter parking, there needs to be a pricing structure that encourages UTS & NRL staff and students, and Precinct retail staff, to park in the Precinct Carpark and not in local streets
The applicant needs to arrange with the City of Sydney Council (including contributing to funding) for more parking policing in the local streets, especially during well attended Stadium events and double-headers.
- The current construction of the Stadium has resulted in many construction workers parking in local South Paddington streets, which were already at parking capacity, causing much grief to residents. Any further construction for this project needs to provide parking on site for all workers and precinct users, or an arrangement made with other parking providers that stops this practice. Again, the applicant needs to arrange with (including contributing to funding) the City of Sydney Council for more parking policing in the local streets.
- The proposal's Heritage Impact Statement confirms that Busby's Bore, including the abandoned spur line which runs through the proposed carpark, is a State Significant Heritage Item which must be protected, yet states that the exact location of the spur is unknown. The applicant needs a contingency plan to redesign the carpark, including featuring the heritage structure, if the spur line is impacted by the current design.
In addition, there needs to be geotechnical advice on the impact of changed ground water on these tunnels.

In conclusion, the proposal has many positives but needs improved public benefit as outlined above, to justify the use of Crown Land for such an intense parking structure.

We ask the Department of Planning Industry and Environment to condition the proposal accordingly.



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President, The Paddington Society

Linda Gosling, Committee Member, The Paddington Society