



THE PADDINGTON SOCIETY Inc.
For Community and Heritage
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Karen Harragon,
Director, Social and Other Infrastructure Assessments
Dept of Planning and Environment
16 July 2019

**Re: Sydney Football Stadium Stage 2 Design, Construction and Operation
40-44 Driver Avenue Moore Park**

Dear Karen,

The Paddington Society welcomes this opportunity to submit our comments on the future SFS Stadium at Moore Park. Members of our community group are committed to preserving and enhancing the heritage and amenity of Paddington, which borders on the Park. We are frequent users of Moore Park and the whole suburb of Paddington is directly affected by the Stadium and the activities that are held there.

We have objected in the past to the re-development of the Stadium as a waste of public money, and as a mis-fit of scale and bulk into our fine-grained, globally-valued, Heritage Conservation Area. Further, the operation of a Tier 1 Stadium is essentially incompatible with acceptable amenity so close to a residential precinct, with adverse operational impacts of traffic, parking, anti-social behavior, lighting and noise.

We still maintain this view but offer our comments on the proposal in an effort to mitigate these impacts of the new Stadium.

We submit that this re-development is an opportunity to improve the impacts evident from the former Stadium, to be a better neighbour.

Our comments on the Stage 2 Stadium proposal are organized under the relevant objectives of the Paddington Society

1. Heritage values: To maintain harmony with existing architectural patterns where new buildings are constructed.

The new Stadium roof appears to be (roof heights are not explicitly stated) almost 40 m high above the Moore Park Rd street level on the long east & west facades. Though the saddle-roof design is welcome, the building is still approx. 12 normal storeys in height to the east & west & 9 storeys in height to the north & south, & 40m in width, so that it will loom over its heritage context, at almost twice the height of the former Stadium. The Applicant has not clearly compared the new Stadium scale to the former Stadium or to the surrounding topography, and has understated the visual impact by not recognising that the whole of South Paddington rises to the Oxford St ridge, so that all south-facing views from houses here will be impacted by the 40m high opaque bulk dominating the skyline.

The Society recommends:

- The Applicant show comparative sections between this proposal & the former Stadium, with figured dimensions for both, and distinguishing between opaque roof height and structural steel mast height, so that the visual impact can be assessed;
- The Visual Analysis include more residential properties higher up in Paddington (Renny St, Regent St, Gordon St, Bent St, higher end of Stewart St) to see the extent of the impact;
- The Stadium height be reduced by reducing the height of the top seating tier, reducing corporate facilities within the seating tiers, and by reducing the pitch RL (currently proposed at 5m above the water table & higher than the previous pitch – see EIS p. 184 & p.128) . Note that a seating capacity of just over 40,000, would still qualify as a Tier 1 Stadium & would satisfy the INSW 2018 Business Case. ;
- That the bulk & scale of the development be further mitigated by high quality façade and public domain design, so that the heritage Conservation Area is not demeaned. Though the proposal is promising in this regard, quality needs to be maintained & not compromised through the whole process. The Paddington Society would appreciate having input on the design quality of these elements, during the documentation & construction phases;
- To preserve the night-time harmony of the Conservation Area and Moore Park itself, the new Stadium & surrounds needs to have a strict curfew on event lighting, and the operation of food & beverage outlets, restricted to 1 hour before events, with any fireworks restricted to ½ hour duration within event hours. Consider yellow-tone lighting, not blue-white-tone, as more suited to a Conservation Area. Night-time lighting quality, including any AV screens, should be periodically monitored and controlled, to avoid a ‘Disneyland’ effect.

2. To protect and enhance the Amenity of Paddington

The Application is for unrestricted number of events, including unrestricted major events and double-headers, apart from keeping the current maximum of 6 concerts a year. This is unacceptable as the amenity impacts on residents is unquantified and could be immense. Event numbers, including concert tests and rehearsals, should be restricted in this high density residential area, noting that there are other Tier 1 stadiums in Sydney in much less restrictive locations that can, and should, host any overflow events that arise. The hours of operation till 11pm are also too onerous in a residential area.

The Society recommends:

- A maximum of 50 events per year (mentioned in EIS p. 121) including a maximum of 10 major events per year & no double-headers (possible since both SCG & the Stadium are under a single management) ;
- All events should end at 10pm at the latest, with a 1-hour ‘bump-out’ period for exit lighting & crowd dispersal;
- Consider black-out periods eg Sundays & public holiday evenings, the Christmas week, for respite purposes.

The Transport Assessment is inadequate, as it counts some 3,000 on-grass event car spaces on Moore Park, despite the Moore Park Masterplan 2040 commitment to progressively remove them. It is also silent on the impact of carparking and traffic in the surrounding residential areas, which is immense especially for major events. Further, the Green Plan does not provide a convincing strategy to promote the use of public transport.

The Society recommends:

- Honour the Moore Park Masterplan 2040 & remove all spectator parking on Moore Park, thus allowing passive use, such as the proposed Sydney Common, in these areas – refer to Section 3 for our proposed parking strategy.

The Noise Management Plan is also inadequate as it relies on the former Stadium's noise levels being acceptable, which they were not, while noting that certain speaker locations during concerts exceeded even these 'acceptable' limits. The proposal to only monitor noise within the Stadium ignores the 'echo' effect that occurs up the hill from multiple masonry terrace walls.

The Society recommends:

- For concerts, limit speakers to the north side of the pitch to reduce the noise impact to South Paddington (see Appendix X) ;
- For major events & concerts, subjective monitoring by staff still takes place, as previously, in order to measure local variations from reflections & the topography.

3. To preserve existing open spaces and expand these for the health and enjoyment of our community.

Moore Park is a green public asset of heritage significance, a Macquarie era legacy, which must be maintained in size, not reduced. As our population swells, we desperately need more informal space to play sport, and more green space for passive recreation as well as contact with the natural environment.

In this regard we support the informal sporting facilities proposed around the new Stadium, with the proviso that skateboarder use needs to be considered to avoid any conflict.

Of greatest concern is the absence of any strategy to commence the removal of on grass car parking spaces consistent with the Moore Park Master Plan 2040, developed by the Centennial Park & Moore Park Trust with extensive community input.. This is a matter that must be dealt with as part of the consideration and determination of this application. The proposed Stadium use will have direct consequence on the surrounding areas including not only Moore Park but also the immediate surrounding residential areas. And beyond. The EP&A Act makes provision for the impact of proposals on the area beyond the site area of the proposal to be dealt with by way of agreements between the consent authority and proponent to ensure strategies and or ameliorative measures are put in place by way of Voluntary Planning Agreements or the like.

- The Society strongly advocates that an undertaking should be entered into to prepare a strategy for the progressive removal of parking on Moore Park, consistent with the Moore Park Master Plan 2040, and be attached as a condition of any consent to this DA.

The Society is of the view that the measures that would go some way to achieving the removal of parking within Moore Park include:

- The progressive elimination of spectator parking on Moore Park and investigation of the provision of alternative parking in existing parking structures in the precinct should be undertaken as a priority;
- integrated ticketing to encourage pedestrian access and public transport use, particularly in the light of the expensive public transport infrastructure that has been provided in the form of Light rail and pedestrian overpasses to the Stadium;
- Provision of extra traffic and parking enforcement personnel for major events to discourage spectator illegal driving and parking to be funded by the proponent;
- Bicycle parking for 90 is inadequate for a 45,000 capacity Stadium and a higher number of temporary bicycle parking should be installed for major events & concerts.

Further, we object to:

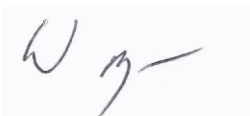
- Any further encroachment on the Park by paving, fences etc associated with the Stadium use– the proposal for a 6m wide path connecting Tibby Cotter Bridge & the Light Rail is excessive. (Appendix H p. 36)

4. Items that need a commitment by the Applicant

The Application alludes to some mitigation strategies beyond its site that are identified but not committed to. We believe the following items need to be conditioned as part of any approval, to protect the values above:

- Identify a detailed Masterplan (i.e. link points, entries, phasing) to allow for pedestrian access to the east of the Stadium, through to the Entertainment Quarter (see Appendix G), in consultation with the Centennial Park & Moore Park Trust;
- Identify a detailed landscape plan, in conjunction with the Centennial Park & Moore Park Trust that rationalises & minimises all hard structures in the Park such as proposed pedestrian paths and fences;
- Provide a Geo-fence for uber drivers to exclude South Paddington as a pick-up zone (see Appendix H p. 41).

Yours faithfully



Will Mrongovius, President The Paddington Society

Per Linda Gosling, Executive Committee The Paddington Society

