

3. SFS/SCG and car parking on Moore Park

This submission critiques the analysis of car parking on Moore Park and associated traffic flows in the SFS Stage 2 EIS, and particularly Appendix H, the Transport Assessment by Arup. It examines issues associated with the availability (or supply) of and the demand for parking as it affects Moore Park, and then sets out a suggested strategy for addressing these issues.

The continuation of event parking on Moore Park at EP2 (1,100 cars) and EP3 (1,000 cars) is a vexed issue for the community. Our association's objectives are embedded in our name and this issue is pivotal to everything we stand for – Saving Moore Park for the benefit of the community and future generations. Our concerns are shared by most members of the Community Consultative Committee: discussion on this issue was more volatile than on any other issue at meetings of the Committee held this year.

(1) INSW's views

Despite the community's hostility to the retention of on-grass car parking on Moore Park, INSW persists with its view that this sits outside the public domain scope for this project, and so can be ignored. We take issue with this viewpoint.

INSW's view is inconsistent with the SEARS 18 requirement (EIS, page 33) that the EIS address "impacts on the Moore Park and Centennial Parklands due to any increased frequency of events and greater use of the on-grass car parking on Moore Park". (We interpret this as meaning the greater use of car parking over time as a result of there being more events.) Section 6.2.8 of the EIS (pages 151-152) does not do this.

INSW's view is also inconsistent with its approach to other issues. For example, the EIS addresses issues associated with the arrival of patrons by taxis and rideshare services (EIS, pages 92, 155) which are also outside the public domain scope of the project.

Although the EIS proposes a Green Travel Plan which relates to how patrons will make their way to the new SFS, it ignores the impact 33-46% of them will have driving there (traffic) and when they get there (parking).

We must ask how meaningful an Environmental Impact Statement is which ignores something associated with the future operation of the new SFS which will have such a significant environmental impact?

To undertake a thorough environmental impact assessment, one would of course also have to document the factors influencing demand for on-grass parking. It is for this reason, we assume, that SEARS 3 (EIS, page 27) requires the EIS to provide details of the proposed events and activities at the SFS and surrounding precinct, including the estimated number, type and duration of events and activities per year.

Rather than provide this information, INSW simply states that “No restriction on the number of events hosted at the stadium is proposed.” (page 84) Furthermore, “the new stadium is capable of accommodating growth in existing sporting events and patronage as well as facilitating new sporting events or major event opportunities as they arise” (EIS, page 63). The lack of any cap on the number of events and the scope for these to increase in number mean the disruption to local traffic and the demand for on-grass parking can only increase. This is the second of the SEARS requirements INSW has ignored (at least in part); we believe this is unacceptable.

The view is expressed that “placing no limit on the number of sporting events that can be held at the future SFS will not induce any greater transport impacts at any one time when compared with limiting sporting event numbers to 52 per year.” (Appendix H, page 16) This is a meaningless statement. The reason for any cap would be to reduce transport and parking impacts over time. If there are more than 52 events a year the traffic and parking impacts will be more frequent, and the community’s ability to use Moore Park will be reduced commensurately.

Recommendation 1 (repeated from our first submission where it is Recommendation 7): Consistent with SEARS 3 and 18 above, INSW should be required to document the projected number of events at the new SFS – the key determinant of demand for car parking. Specifically, it should address two questions:

- What is the maximum number of games expected to be held annually which are half full, peak events and concerts?
- How does this compare with the number of games held in each of the three full years prior to the demolition of the stadium?

Recommendation 2: Any new sporting events or major event opportunities should be subject to a formal DA process which should identify impacts and limits that will be imposed on on-grass parking (and other impacts – see Recommendation 9 in our first submission).

Recommendation 3 (new): So long as on-grass parking continues to be permitted at EP2 and EP3, the number of sporting events should be capped at 52 and the number of individual concerts or other activities should be capped at six, so that Moore Park isn’t just used as a parking lot for the benefit of the SCG Trust, the sporting codes and their patrons.

(2) Why parking on Moore Park needs to be addressed

Under its Act of Parliament, the Centennial Park & Moore Park Trust (CPMPT) has several objects, including:

- To maintain and improve Trust lands
- To encourage the use and enjoyment of the Trust lands by the public
- To ensure the protection of the environment within the Trust lands

Car parking on two large swathes of Moore Park prevents the Trust from meeting these objects so far as these areas are concerned. The Moore Park Master Plan notes that:

- Temporary event parking on the grassland at Moore Park East diminishes the Park's quality and flexibility for sporting use. (page 13)
- Progressive re-location of on-grass car parking to distributed locations can recover valuable areas of green space and unlock new opportunities for increased passive and active recreation use across the parkland. (page 13 and page 19 Move 2)

Car parking on EP2 and EP3 in connection with sporting events and concerts occurs on perhaps 60 days a year. Not only is this 60 days when the community is denied access to large areas of the park, but the damage cars do is such that the community's ability to use Moore Park for recreation on the other 305 days is seriously impaired.

EP2 and EP3 have become seriously degraded. Lumps of rock and concrete are pushing through, making it unusable for organised school or community sporting activities and uncomfortable for passive recreation. Until car parking is removed from EP2 and EP3, the Trust will be unable to remediate and upgrade the areas concerned so they can be used and enjoyed by the community and will be unable to protect them effectively for the benefit of future generations.

The importance of green space for the mental and physical health and wellbeing of the community is well documented, globally. Population density close to the Park, already high, is set to rise sharply over the next few years, with a further 60,000 people in the Green Square/Waterloo area. The need for green space, which is already great, is thus increasing dramatically.

The Moore Park Master Plan's views on car parking need to be seen against this backdrop.

Consent condition B12 focuses on how the SFS development "can contribute positively towards and support the principles, moves, opportunities and strategies within the (Moore Park) Masterplan." There is no other single action associated with the development that would contribute as positively towards the Masterplan as the removal of on-grass parking at EP2 and EP3.

(3) The availability (or supply) of parking

The CPMP Trust has indicated that it wishes to commence the progressive removal of car parking as soon as practicable after the light rail begins operation. (The suggestion that the Master Plan proposes that this should occur over the medium and long term (EIS, page 153) is incorrect). In this, the Trust has strong community support. Community representatives on the CCC were emphatic about the need for car parking to be removed (Appendix HH, pages 35-36). However, the sporting codes are equally emphatic in their opposition to the removal of car parking (Appendix HH, pages 45-48).

In proposing the progressive removal of parking on green space, the Moore Park Master Plan included an important caveat: that this should not happen "until supplementary parking in dispersed locations has been created. This will ensure there is no net loss of event related parking in the precinct." (page 26)

It is our belief that the “no net loss” condition was inserted to deflect criticism from the SCG Trust and the sporting codes. However, times have moved on, as is reflected in the overarching aim of the Green Travel Plan (Appendix H, Section B3.1) to “positively influence the travel behavior of users of the venue by promoting alternative travel modes to car”. This Plan is intended “to generate less vehicle traffic during major events” (EIS, page 155), “to reduce car dependency” (EIS, page 156), and “to encourage increased usage of non-car travel modes including public and active transport” (EIS, page 196).

We do not believe that the “no net loss” condition is consistent with the objectives of the Green Travel Plan. In the final section of this submission we suggest a strategy which, while resulting in a net loss of car parking on Moore Park, needs to be viewed as part of a package of other measures relating to both the supply of and demand for parking.

(4) The demand for parking

While INSW has no role to play in the provision of event car parking on EP2 and EP3, it does have a major role in influencing the demand for parking there.

The overarching aim of the Green Travel Plan is to “positively influence the travel behavior of users of the venue by promoting alternative travel modes to car”. (Appendix H, Section B3.1) An effective Plan would substantially reduce the demand for car travel and thus parking on Moore Park. However, the Plan INSW/Arup have produced is far short of what is required to achieve this.

INSW/Arup suggest that that the future stadium will generate less vehicle traffic during major events than the former stadium due to the improvements in public transport access by the Light Rail, as well as the Green Travel Plan measures. (Appendix H, page 31) However, its forecasts tell a different story. With a half-full stadium, the Plan forecasts that 46% of patrons will come by car and so require parking. This is just 2% less than was the case with the former stadium. With peak events, attended by 45,000 people, 33% will come by car, down from 34.9%. The decline is trivial and parking demand will thus be virtually unchanged. (Appendix H, page 13)

The problem is that the Green Travel Plan has been developed from the bottom up, focusing on individual components, assessing the scope for action and then aggregating their impacts, rather than top down, with a clear target being set and then identifying key actions to achieve that target.

The Green Travel Plan comprises a hotpotch of minor “practical measures and travel initiatives” (Appendix H, page 17) which, however desirable they may be in their own right, will collectively have a negligible impact on local traffic and parking demand. Of 13 measures, six are directed at staff, who will represent a tiny proportion of people travelling to the SFS on event days. “Implementing initiatives to encourage public transport” is described as a “key outcome” of the stadium redevelopment (EIS, page 112). However the measures lack any insight into how a meaningful shift from travel by car to public transport can be achieved.

The only one of the 13 that has any substance is integrated ticketing. INSW/Arup note (Appendix HH, page 26) that integrated ticketing currently applies to all NSW Waratahs, Rugby Australia, and Sydney FC games. Thus while the Sydney Swans and Sydney Roosters may negotiate integrated ticketing arrangements directly with TfNSW, the effect of integrated ticketing on car numbers and the demand for parking will be more limited than appears at first glance.

The table 'Forecast Mode Share and Travel Demand' show that basically there will be a straight switch from special events buses to light rail rather than a significant increase in patrons arriving by public transport as a whole. The light rail will carry 12% of patrons attending half full games at the new stadium and 16% of those attending peak events. However, these figures are largely offset by a reduction in patrons carried by special event buses – from 8% to 0% for half full games and from 14.5% to 2.5% for peak events.

No explanation is given for why most special event buses will cease to operate once the light rail is operating. Described as “one of the 10 priority infrastructure projects”, the Light Rail is intended to ensure “that the stadium operates in conjunction with improved transport capacity” (EIS, page 106). However, the removal of special event buses will largely negate any benefit. It makes no sense.

The scaling back of special event buses is clearly inconsistent with the suggestion by INSW/Ethos Urban that “A key driver of the design the stadium, and its future operation, is to limit the use of private vehicles when travelling to and from the site and therefore assist with addressing traffic experienced in the area.” (Appendix HH, page 26). It is also inconsistent with Arup's view (Appendix H, page 32) that “Light rail and public transport would have additional capacity to transport people to the SFS.” Finally, it is inconsistent with the emphasis in the Greater Sydney Region Plan on “a well connected city”.

INSW proposes 'stretch' mode share targets which will involve a greater shift away from private cars – but they are likely to be achieved only after “a number of years” (Appendix H, page 14). Even these result in 28% coming by car for peak events – down from 33% in the baseline forecasts. (No stretch target is provided for half full events.) However there is no action plan for achieving the stretch targets and no timeline, so they are meaningless.

Despite the remarkably poor outcome of the Green Travel Plan, INSW/Arup propose no specific mitigation measures (EIS, page 158). What is suggested in lieu is a mixture of plan development “where required”, consultation and liaison. With such weak forecasts for public transport use, the absence of any meaningful actions to reduce car dependency is unacceptable.

(5) A strategy to resolve the parking issue

We currently have a hiatus. **On the supply side**, INSW cannot make a decision to remove car parking from EP2 and EP3. But the CPMP Trust's ability to proceed is also constrained by the strong views of the SCG Trust and sporting codes. **On the demand side**, INSW has provided a Green Travel Plan which will do little or nothing to reduce car dependency.

In our view, the solution lies not in simply removing parking – reducing supply – but also in more radical actions designed to reduce the demand for car parking.

(a) Reducing supply

The prevailing wisdom is that the cessation of parking at EP2 and EP3 will mean a net loss of parking spaces. This may be the case, but not necessarily. It is more likely to be a net loss of such convenient parking spaces, though even this needs careful assessment.

The Moore Park Master Plan proposes to “Improve access and increase car parking capacity at established facilities (and) redistribute major event day parking to these car parks such as at E.S. Marks Athletics Field, Moore Park Golf, Entertainment Quarter and other nearby areas.” Such options will temper the impact of removing car parking from Moore Park.

It is also significant that, in its Transport Assessment (Appendix H, page 32) Arup notes that “Light rail and public transport would have additional capacity to transport people to the SFS to offset the loss of parking in the event EP2 and EP3 are no longer available.”

This view is consistent with that of INSW/Ethos Urban that “The provision of a new light rail stop at Moore Park will also improve accessibility by public transport to the precinct and contribute to the aim to reduce overall traffic impacts. (Appendix HH, page 27)

A good example of the role light rail can play is the proposal by Waverley Council (Appendix HH, page 43) that parking be provided at Randwick Racecourse on game days with patrons being encouraged to catch the Light Rail to the stadium. We agree. We have done a preliminary analysis of the scope for parking at Randwick Racecourse to replace that on Moore Park, having regard for numbers and convenience. We are willing to share this with the Department of Planning.

In summary, the capacity of infield car park at Randwick Racecourse is about 3,000 cars, with perhaps 600 in a multi-level carpark. This is more capacity than would be lost by the removal of parking at EP2 and EP3. Most people using the light rail will be coming from Central Station to Moore Park, so this would be a good opportunity to back fill the carriages from Randwick Racecourse, two stops further on.

This may not seem as attractive for patrons, but at \$10 per car it would be considerably cheaper (and would be free if the cost were included in the cost of integrated tickets). It would perhaps take people 15 minutes to park their car, catch the light rail to Moore Park and walk to the SFS, and the same in reverse. Against that, entry to, and particularly egress from, EP2 and EP3 can be very slow, but would be considerably faster from Randwick Racecourse. More generally, the dispersion of car parking would, as noted in the MPMP (page 13), minimise the concentration of traffic volumes and so reduce congestion before and after events. People will get home more quickly.

For this to work will require a change in mindset among those who view ‘convenience’ as meaning ‘close proximity’. But it worked at Homebush when the Olympic Stadium opened. After a while people realized they could get there and get home faster by public transport.

However, it is clear that with such strong and conflicting views, a decision to remove car parking from EP2 and EP3 can only be undertaken at ministerial level or by Cabinet. CCC members have suggested (Appendix HH, page 36) that December 2020 should be set as the deadline for the removal of parking on Moore Park. We endorse the view that a clear timeline should be provided for the removal of car parking so as to give the various stakeholders an incentive to work together to develop alternative solutions.

We believe the following actions geared to the removal of car parking on Moore Park should be taken in conjunction with other actions to reduce demand discussed in the next section:

Recommendation 4: A consent condition should be that:

- The removal of car parking from EP2 should begin by mid-2020 and be completed by mid-2021.
- The removal of car parking from EP3 should begin by mid-2021 and be completed by mid-2022.

These dates would mean the new parking arrangements will be operational by the time the new stadium commences operations.

Recommendation 5: Once the Light Rail is operational, parking facilities should be provided at Randwick Racecourse in conjunction with events at the SFS and SCG, with the cost to be included in the cost of integrated tickets.

Recommendation 6: As proposed in the Moore Park Master Plan (Page 19, Key Move 20), a key stakeholder working group should identify further options in the precinct to address traffic movement, congestion and parking issues.

Recommendation 7: This group should submit its report to the Minister for Planning in sufficient time that the timetable in Recommendation 4 can be achieved.

(b) Reducing demand

The Green Travel Plan forecasts that

- 46% of people attending half full events at the new SFS will drive and thus require parking. This is 2% (or 450 people) fewer than with the old stadium.
- 33% of people attending peak events will drive – 1.9% (or 855 people) fewer than with the old stadium.

We believe a much larger reduction can be achieved by setting targets and then developing action plans to achieve them.

Recommendation 8: Once the light rail is operational, the goal of the Green Travel Plan should be to achieve the following:

- By mid-2021, no more than 36% of people attending half full events will drive, and no more than 25% of people attending peak events
- By mid-2022, no more than 26% of people attending half full events will drive, and no more than 20% of people attending peak events.

In support of these outcomes, we recommend the following actions:

Recommendation 9: INSW should work with TfNSW and other Government agencies as appropriate to develop an action plan that will reduce the demand for patrons accessing the stadium by private car.

Recommendation 10: This should include the retention of as many special event buses as is necessary to ensure patrons can arrive in good time to SFS events and leave promptly afterwards.

Recommendation 11: If there's insufficient light rail frequency, special event buses should operate between Randwick Racecourse and the bus interchange in Moore Park before and after SFS events.

Recommendation 12: Consideration should be given to extending special event buses to Wynyard Station, Bondi Junction and Circular Quay

Recommendation 13: The Government should require the Sydney Swans and Sydney Roosters (and any other NRL clubs that may occasionally use the SFS) to adopt integrated ticketing as a condition of using the SFS or SCG.

Recommendation 14: NSW Cricket and the Australian Cricket Board should also be required to adopt integrated ticketing as a condition for their using the SCG.

Conclusion

The standoff between various parties over the future of parking on Moore Park can only be resolved by a whole-of-Government approach, one that sets a date or dates for its removal, determines the actions needed to achieve these, and implements them. It must involve action to ensure public transport types and levels which are commensurate with the goals of the Green Travel Plan of reducing car dependency and encouraging increased use of non-car travel modes including public and active transport.