

Background

The Newington Gunners Soccer Club (“NGSC”) is a community based, amateur football club established in 2004, which draws players, coaches and volunteers from the suburbs of Newington, Wentworth Point and Sydney Olympic Park. It is the only Club in the locality that provides members of those communities with the opportunity to participate in the most popular sport in Australia.

Since its inception, NGSC has enjoyed access to Wilson Park as a home ground from February to August each year for purpose of staging games and conducting training.

Wilson Park is situated in the Parklands of Sydney Olympic Park subject to SOPAs Parklands Plan of Management 2010, and is identified as a significant community sporting and recreation asset in the “Community Facilities Strategy for Master Plan 2030 (2018 Review)” which prepared by Elton Consulting” for the purpose of The Sydney Olympic Park Masterplan 2030.

In order to conduct training and to schedule games on the weekend, NGSC requires access to two (2) fields, set up to play soccer (with fields marking, goals posts and lighting) from February to August each year. The fields must be able to accommodate training on 3 nights during the week and be available to hold games all day on Saturdays and occasionally Sundays. We also require parking in proximity to the fields for families and children to be able to safely access the fields.

Wilson Park has continually met these requirements for the last 15 years.

Key Issue 1 – Lack of Consultation with Newington Community

Issues/ Justification:

NGSC submits that neither the club nor the community impacted by the change of use of this open space have been properly consulted and that the requirements of the Secretary’s Environmental Assessment Requirements (SEARS) have been met.

It is noted that a requirement of the SEARs is that consultation must occur with “*existing users of Wilson Park*”

We submit that no such consultation has occurred and that the consultation requirement set out in the SEARs have not been met.

The Social Impact Assessment states that consultation about the Wilson Park development proposal was undertaken with the Newington Gunners Soccer Club (NGSC) via the Sydney Olympic Park Authority (SOPA). Significantly, the discussions between NGSC and SOPA to which the SSDA refers:

- Occurred prior to the issuing of the SEARs; and
- Were restricted to the availability of alternative playing fields in the event that the Club would not be granted access to Wilson Park after the 2019 season.

Neither SOPA nor Cricket NSW made contact with the NGSC to inform it about the requirements of the SEARs or to discuss the content of the proposed application before its lodgement.

We submit that the failure to make direct contact with NGSC after the release of the SEARs represents a failure to comply with the requirements of the SEARs and has resulted in a Social Impact Assessment that does not properly consider the social impact of the development.

The State Significant Development Application (SSDA) advises that a community drop in session was held on site Saturday 28th September 2019. Significantly, although Wilson Park is located on the Southern side of the Parramatta River adjacent to Newington, residents on the Northern side of the Parramatta River were letter box dropped with a project flyer to inform them of the proposed application . Remarkably:

- The NGSC was not sent a copy of the project flyer and was not otherwise notified of the consultation meeting by SOPA or Cricket NSW.
- None of the residents in Newington received a copy of the project flyer (it would appear they, and all others on the same side of the Parramatta River as Wilson Park, were not in the letterbox drop zone despite their clear proximity and connection to Wilson Park).

The NGSC committee was made aware of the community drop in meeting at short notice by residents north of the river who had received the project flyer, and a NGSC representative attended to request that consultation be undertaken with the Newington Community and NGSC. The request was followed by a written request that the Newington Community be consulted prior to the lodgement of the SSDA.

No response was received to a number of requests, until NGSC members were invited to a meeting at which time it was advised that the application had already been lodged and so no consultation would be undertaken.

Additionally, the social impact assessment does not discuss the impact on any other users of the facility. It fails to acknowledge:

- Wilson Park was the home to the Sydney Psychos Dog Club until mid 2019 when they were forced to relocate due to the proposed development.
- Wilson Park has in recent years been used by a soccer team consisting mostly of players from Korean ethnic origin on a Sunday. To the best of NGSC's knowledge, the field is still used every Sunday morning (even during the off season) by some of this group. It is understood that they have fielded teams in the Churches' league in the past, and have used Wilson Park as their home ground

The Social Impact Assessment makes reference to conversations held with Officers from the City of Parramatta Council, but it does not indicate whether details of all recent hirers of Wilson Park were obtained. There is no evidence of any attempt to identify or communicate in a systematic way with the “existing users of Wilson Park”. There is no evidence that either of the users above, who the NGSC and Council are aware of, have been consulted. We consider this to be a further failure to comply with the SEARs.

The failure to comply with the SEARs requirements has resulted in a SSDA being lodged which does not accurately represent the social impact of the proposal. This will be discussed in Issue 2 detailed in this submission.

Requested Action:

That all previous users of Wilson Park, including the Newington Gunners Soccer Club, be formally consulted; and consultation be undertaken with the broader Newington Community.

Key Issue 2 – Social Impact Assessment (SIA) submitted does not properly assess the impact of the proposal on the existing and future Sydney Olympic Park

Issues/ Justification:

Due to the failure to consult with stakeholders, the Social Impact Assessment (SIA) does not properly assess the short or longer term impact on the availability of active recreation space.

The SIA indicates that a new ground has been secured for the Newington Gunners at Eric Primrose Reserve. The SIA does not discuss the details or the true impact of the proposal. The NGSC will be sharing Eric Primrose Reserve with Parramatta City FC in 2020 because there are no other viable options available. When NGSC was housed at Wilson Park, both of these clubs had access to four fields during the soccer season. In 2020 they will be forced to share 2 fields. Both clubs will have 50% of their previous capacity. This is not acknowledged, let alone assessed in the SIA.

Beyond 2020, the NGSC have been working with City of Parramatta Council and Council has indicated that Newington Reserve, at the corner of Holker Street and Slough Avenue, will be redeveloped into a single sports field, and made available to the Club. However, as this new facility will only be able to accommodate one field, in the medium term the club will be impacted by only having access to half the number of fields it previously had available. This is a significant issue outright, which is further compounded by local population growth. Again, these medium term impacts are neither acknowledged nor addressed in the SIA.

The new facility at Newington Reserve will not have any capacity for on-site parking. Opposite this facility is a Gym and an Indoor sports facility, and the overflow parking from these uses on Slough Street during the evenings is already significant, and therefore it is likely that traffic issues will arise during the beginning and end of soccer club training sessions. We are particularly concerned about the impact of this on the safety of younger children who will potentially be dropped off and picked up from training sessions in a congested street. Again, the failure to properly consult means this was not understood by the consultants preparing the SIA and therefore could not be taken into consideration in their assessment.

The assessment does not mention the Community Facilities Study prepared by Elton Consulting on behalf of SOPA to support the SOPA 2030 Masterplan, which is the planning framework that underpins SOPA growth plans. THE SIA on page 41 states

“However, it is noted that Wilson Park is not prioritised for renewal or upgrade as part of Sydney Olympic Park Authority’s broader vision for the area.”

However on Page 9 of the Elton Community Facilities study which is part of the SOPA masterplan the following statement is made:-

“Wilson Park (3 ovals) – upgrade of park, community access to premier field”

The Elton Community Facilities study goes on to identify a benchmark for community playing field of 1 field per 4500 people (refer to Page 9). It identifies a range of fields that will be improved in Sydney Olympic Park, including Wilson Park, to support the growth in population in the Newington-Olympic Park-Wentworth Point area.

The SIA lodged with the proposal does not do any bench marking of sporting fields available to the population, however the SOPA masterplan process acknowledges the demand for sporting fields and the need to make a contribution in terms of local sporting fields. With the new single field to be provided by Council (at Newington Reserve), there will be a net loss of 2 sporting fields in the locality. As part of the assessment, either the applicant or the Department should undertake the benchmarking exercise, and include the impact that the loss of these sporting fields will have on the number of playing fields per 4500 people in this catchment in the assessment report

The SIA fails to undertake any type of assessment of the impact of the loss of sporting fields on the availability of active recreation communities for the future population growth, or to acknowledge that the loss of Wilson Park is inconsistent with the benchmarking and active recreation space planning undertaken by SOPA when their planning for the significant growth that has now been approved in Sydney Olympic Park was undertaken.

The NGSC acknowledges that use of the field for cricket purposes may provide a public benefit, but as it will be an elite sporting facility with limited public access, it significantly decreases the availability of active playing fields for the general community in an area where both Council’s studies (acknowledged in the SIA) and the SOPA Masterplan (not

acknowledged in the SIA) acknowledge that there needs to be an increase in the availability of sporting fields available to the general public, rather than a decrease as is proposed in this case.

While the ideal outcome for the NGSC is for another location to be found for the Cricket Centre of Excellence that does not impact on the availability of sporting fields to the general Newington-Olympic Park-Wentworth Point community, if the proposal is to be granted consent, then a condition to ameliorate the impact on the Newington Gunners Soccer Club should be included.

The SEARS explicitly requires Cricket NSW to demonstrate how its development will achieve an optimal (ie best and most favourable) community outcome, including with regard to the proposed community field. Regrettably, it would appear that Cricket NSW may be taking a narrow view of 'community', restricting it only to the cricket community.

The existence of a community field as part of the SSDA provides a means to ameliorate the detrimental impact the proposed development would have on local community groups, such as NGSC, whose use of the community field could co-exist with cricket.

We submit that it is will not be possible to demonstrate the best and most favourable community outcome with respect to the community field while ever a narrow view of the community it will serve prevails. A broader view of the community must be considered, one which takes into account the geographically local community as well as local sporting and recreation groups that have enjoyed access to Wilson Park as a community facility for many years prior to the proposed development. This is particularly so given the lack of any SOPA provided alternative community sporting fields, which could replace the community role that has been played by Wilson Park for over a decade.

NGSC seeks a condition requiring the club be granted access to the community field during the cricket off season (March – September) for training on Wednesday nights for up to 80 children aged 6-10 and access for matches (6-10 yr olds) on Saturday mornings, as this would ameliorate the short to medium term impacts on NGSC from only having access to one field instead of two. It would also ensure that the younger children can be accommodated on a field with less traffic congestion which will improve the ability for these kids to safely access their training sessions, compared to the proposed facility and Newington Reserve. Further, it will reduce the potential concentration of local Saturday morning traffic congestion in the area.

To the extent required, consent should also be conditional on the installation of adequate lighting to make training permissible after dark during winter.

We acknowledge that this may not be required in perpetuity but a clause that requires access until SOPA provide additional fields as specified in the SOPA Masterplan would be acceptable. Refer to Issue 3 for details of additional facilities SOPA have previously committed to.

We do note we have made this request to the applicant and received an email response indicating this would not be possible for various operational and other reasons. Notwithstanding this, we are still seeking this condition on a temporary basis while we find a permanent home within Sydney Olympic Park through SOPA.

Requested Action:

That a revised Social Impact Assessment informed by the additional consultation be prepared and placed on public exhibition before determination of the application.

Key Issue 3 – Consistency between Sydney Olympic Park Masterplan, the Parklands Plan of Management and Proposed Development

We seek some clarification concerning the relationship between decisions made by the then Department of Planning and Environment on the Sydney Olympic Park Masterplan, and how those decisions relate to the decision the Department of Planning Environment and Industry is being asked to make about this development application.

Issues/ Justification:

With respect to the Sydney Olympic Park Masterplan document, Section 4.5 of the *Master Plan 2030 (2016 Review) - Response to Submissions Report* prepared by SOPA as a result of exhibition of the Sydney Olympic Park masterplan in 2018, refers to open space as follows:

Provision has also been made for active recreation areas including upgrades to the Tom Wills Oval to provide new community facilities, as shown in Figure 4.9 of the Master Plan, and a new sporting field at the Archery Centre which is located within the Parkland but outside the area shown in Master Plan 2030 (2016 Review).

Finally, it should be recognised that the Authority manages a unique extensive network of open spaces including wetlands and the Newington Nature Reserve. While these areas are located outside the development core, they are valuable assets that provide open space and access to walking, cycling, picnicking and other recreational activities to meet the needs of residents, workers and visitors to the Park.

This concurs with advice SOPA have provided to NGSC. NGSC has been invited by SOPA to lodge a submission on a revised draft Future Directions Statement which SOPA has advised is part of the process of realising the additional active recreation areas to which SOPA committed as part of the Masterplan.

The Masterplan was supported by a “*Community Facilities Strategy for Master Plan 2030 (2018 Review) prepared by Elton Consulting*”. This study includes numerous references to Wilson Park’s contribution to meet the demand for active recreation space for residents of

Sydney Olympic Park. Refer to the commentary on this issue in the previous section. We are concerned that this proposal is inconsistent with the Sydney Olympic Park Masterplan and would like the following issues addressed in the assessment report:-

1. If the density achieved in the SOPA Masterplan is based on Wilson Park being available to accommodate the needs of the future SOPA Masterplan residents, is SOPA able to change the use of Wilson Park?
2. Is the SOPA Masterplan an approval given by the Department of Planning conditional upon SOPA providing the infrastructure they said they were going to provide in their masterplan supporting documents such as the Community Facilities Study?
3. If another developer was proposing a development as part of a DA or rezoning proposal and they said they would provide certain infrastructure can they just change that infrastructure to another use? Wouldn't they need to amend their DA or rezoning to justify the change in proposed infrastructure provision?
4. How does the Sydney Olympic Park Development process work? Can a SSDA amend the Masterplan without any impact on the Masterplan?
5. Would any change proposed by SOPA, in this case to change the use of Wilson Park, require a review of the Masterplan? If not why not?
6. Does the density of the masterplan decrease because of the decreased infrastructure available due to this SSDA?
7. Would it be premature to approve another use for Wilson Park without amending the SOPA Masterplan? What is the process for amending the Masterplan and does it require public exhibition?

Given that the Minister for Planning was also made the Minister for Open Space following the last election, it appears that the provision of open space is an important policy issue for the NSW Government. We are concerned that it would be premature to approve a development of Wilson Park where community access to active recreation facilities to meet their day to day needs will be significantly restricted, without understanding the impact this will have on the availability of open space to accommodate a significant increase in density on the Sydney Olympic Park peninsula. Development of residential towers is progressing in Sydney Olympic Park, and thus the demand for active recreation is increasing with every new building approved.

Our strong preference would be for there to be no net loss of sporting fields, or at the very least, if this SSDA is to be approved, that the Masterplan be formally amended in recognition of the decrease in infrastructure available to future residents.

However, if the SSDA is going to be approved and there *will* be a net loss of sporting fields available to the existing and future community, there should be a condition on the approval to ameliorate the negative impact. A condition requiring the owner (SOPA) to bring forward the new sporting field at the Archery Centre (as discussed in their masterplan response), with the condition specifying a clear delivery date for this facility, and the time frame to be as deemed appropriate by the Department of Planning - but certainly within 5 years from the date any consent is granted, could ameliorate this impact.

Requested Action:

1. The SOPA Masterplan 2030 be reviewed prior to this SSDA being approved to ensure that the broader Masterplan framework reflects and is consistent with any decision to decrease the level of active recreation infrastructure available to current and future residents.

2. If a review of the Masterplan is not supported by the Department of Planning a condition should be imposed on this consent requiring the owner of the subject site (ie SOPA) to deliver the new sporting field at the Archery Centre within 5 years of any consent being granted for the subject SSDA.