

THE PADDINGTON SOCIETY Inc.
For Community and Heritage
Est 1964

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Social & Other Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

**SUBMISSION - SYDNEY FOOTBALL (ALLIANZ) STADIUM - 44 DRIVER AVE,
MOORE PARK - PROPOSED DEMOLITION AND CONCEPT PLAN - SSD_9249**

The Paddington Society ('the Society') submits its total opposition to the proposed demolition of the Sydney Football Stadium (Allianz Stadium) and Concept Plan for the construction of a new stadium with seating for 45,000 people.

Notification Period

The Paddington Society is dismayed that given the high level of community interest and concern in relation to this development proposal, that a period of only 28 days (20 working days) has been provided for the public to absorb a complex series of technical documents to understand the proposal and prepare a submission.

The Society notes that reference is made in the SSD documentation to 'Reference Design Plans'. These appear not to be publicly available. The lack of public access to these key plans that express the detailed design objectives for the stadium underlines the lack of real community consultation and involvement in this proposal and community cynicism towards the consultation process.

Justification for Demolition - Business Case

The demolition of the existing stadium is an outrageous and unnecessary act. Members of the Society have attended information sessions that purport the cost to refurbish the existing stadium to be \$714million as compared with a new build costing \$729 million. We do not believe these figures.

The Society recognises, with disappointment, that the SFS has been neglected and not well maintained during its 30 year lifespan. However, looking after the building has been the responsibility of the Sydney Cricket Ground Trust. This same organization has acted responsibly in the upgrade and maintenance of the Sydney Cricket Ground, with buildings over 150 years of age. If the SCG Trust has failed in its duty to maintain the SFS then it is the responsibility of the Trust to meet the costs of upgrading the SFS, not the general public.

It is suggested that the stadium needs to be brought up to 'international standards'. The Committee members are regular patrons of the SFS and do not perceive there to be a problem with the existing standards. The shortcomings identified within existing stadium to justify the demolition including additional disabled seats and public amenities, modern food and beverage offerings, and more weather cover could easily be provided.

It is beyond our comprehension why an existing stadium with a 42,000 seat capacity is to be demolished and replaced with a stadium of much the same capacity.

Heritage Context

Conservation Areas

The Allianz Stadium is surrounded by Heritage Conservation Areas, namely, the Moore Park Heritage Conservation Area (C36 - Sydney Local Environmental Plan 2012); the Paddington South Heritage Conservation Area (C48 - Sydney Local Environmental Plan 2012); the Furber Road Heritage Conservation Area (C6 - Sydney Local Environmental Plan 2012); and the Victoria Barracks Heritage Conservation Area (C49 - Sydney Local Environmental Plan 2012). The Allianz Stadium site is within the Moore Park Heritage Conservation Area C 36.

Individual Heritage Items - State Heritage Register and Commonwealth Heritage List

The 1827/37 Busby's Bore is listed on the State Heritage Register in 1999 (Permanent Conservation Order), passes beneath the development site. The Allianz Stadium Site directly adjoins the Sydney Cricket Ground Members' and Lady Members' Stands listed on the State Heritage Register in (Permanent Conservation Order 1985).

The site is directly opposite the State Heritage Register Listed Centennial Park, Moore Park, Queens Park (Permanent Conservation Orders), and now nominated for the National Heritage List. These parks and the Allianz Stadium site were part of Governor Macquarie's 1811 Sydney Common.

The site is also directly opposite the 1848 Victoria Barracks listed on the Commonwealth Heritage. The Victoria Barracks precinct is the finest complex of colonial barracks (pre 1850) in Australia still in military use. The precinct contains one of the best groups of colonial sandstone buildings in NSW and is a very fine example of colonial buildings. The Victoria Barracks is one of the most architecturally imposing nineteenth century military establishments in Australia.

The Society is dismayed at the absence of a detailed investigation of the interface with Paddington. There is analysis that reflects that significance of Paddington as a Victorian Place. Tellingly, there is no cross section showing the impact of the scale of the proposed stadium on Paddington.

Allianz Stadium (Sydney Football Stadium)

The Sydney Football Stadium is listed on the National Trust Register.

The Sydney Football Stadium is one of a suite of Bi-centennial and Olympic projects to celebrate Australia's Bicentenary and is of State heritage significance as an excellent example of a Late Twentieth Century Structuralist style public building.

The Sydney Football Stadium is critically acclaimed, both nationally and internationally, by the architectural and engineering professions. It is recognised as a significant example of Twentieth Century architecture demonstrating a high level of creativity in its concept, and a high level of integrity in the execution of the original design concept. It has been recognised as an important contributor to world and Australian architecture.

Importantly, the National Trust’s listing description of the Sydney Football Stadium documents how its construction was specifically designed to minimize impacts on the Paddington and Moore Park Conservations Area and the surrounding residential built form.

The Society queries the urban design and heritage studies and considers the assumptions made in relation to the existing stadium outside the expertise of the reports. The Society strongly objects to the demolition of this important award-winning building that was specifically designed to minimise impacts on its historic and parklands setting.

There is no independent expert assessment of its heritage values included as part of the EIS. Any consideration of the future of the Sydney Football Stadium should only be made following an assessment by the NSW Heritage Council as to its heritage status.

Proposed Built Form

The major determinant of the concept plan is a ‘Tier 1’ Stadium, a definition that is unclear and appears to be an invention to lend this proposal some ‘stadium’ credibility. The various examples of ‘Tier 1’ stadia are included in the documentation. Each of the stadia are building forms located in substantial open space. This is not the case with the Sydney Football Stadium, which is being shoehorned into a restrictive space that cannot accommodate a ‘Tier 1’ Stadium of the type aspired to.

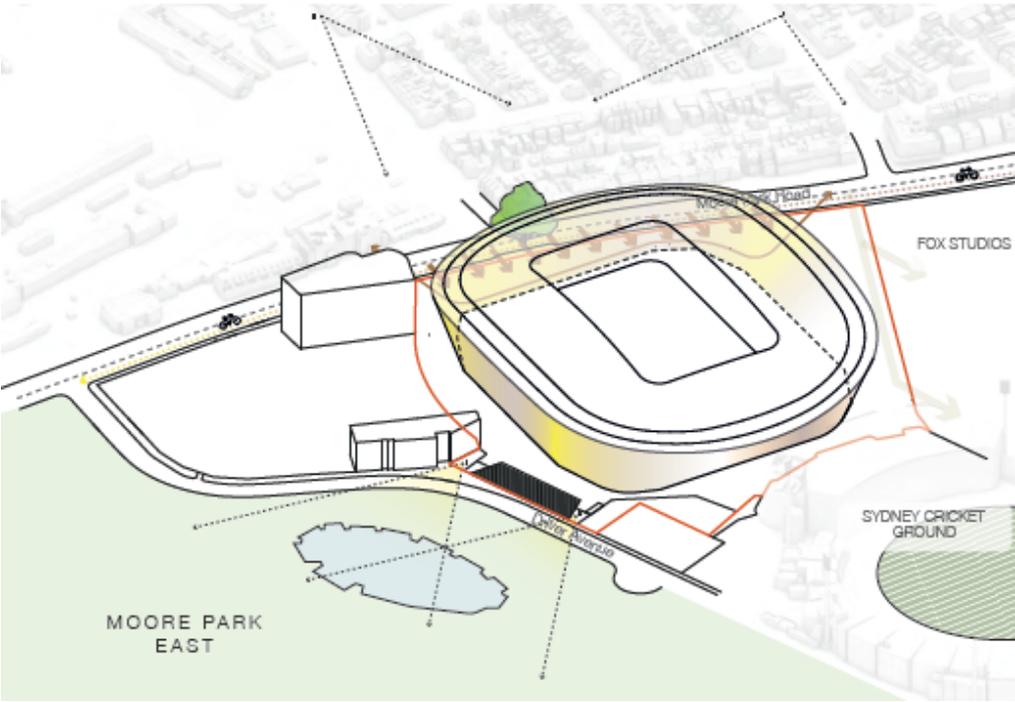


Figure – Tier 1 Stadium being shoe horned into unsuitable location

The photomontage demonstrates the major visual impact of the maximum building envelope that forms the concept design proposal from most of South Paddington.

The proposed stadium envelope will present as a 'colosseum' wall compared to the saddle-shape existing Sydney Football Stadium. It will overwhelm the scale of the residential landscape of the Paddington Conservation Area.

The Society is very concerned that the proposed stadium that would result from the Concept Plan will result in an overwhelming and unsuitable design that it will have major negative impacts on the immediately adjoining Moore Park and the Paddington Conservation Area.

Related Development

The proposal involves the demolition of the Sheridan Centre, Roosters Building, Waratah's Building, the Cricket NSW Administration Building and the other ancillary uses including stadium gym, pool, tennis courts and squash courts. No provision is made for their replacement in the redevelopment and it is unclear where these buildings and services will be located. The silence raises questions of undisclosed expansion into the parklands precinct.

The documentation is silent about the replacement of these activities. If they are to be replaced or relocated on other land in the parklands precinct, these must be identified and form part of an integrated and comprehensive public master plan.

Landscaped Open Space

The increase in the size of the stadium footprint means that there is less potential for open space. As a consequence, poor consideration has been given to the provision of soft landscaping in this vital but diminishing Parks precinct, including tree planting and street setbacks, and no commitment to cease parking on grassed Moore Park areas during events.

Tree Removal

The Arboricultural Impact Assessment indicates the removal of some 26 trees. Of the trees proposed to be removed, the group identified as number 124 in particular, located on the western side of the internal road adjacent to the Sydney Roosters, includes Hills Weeping Figs that are considered to be of high landscape value. These clearly should be retained and do not appear to be an impediment to any works.

Traffic and Parking

Traffic gridlock already occurs in the areas adjacent to the existing stadiums on days when multiple events. It is difficult for residents to already access homes due to traffic congestion from patrons arriving and leaving the stadiums. Illegal parking is endemic during major event. A full assessment of traffic and parking impacts assessment which takes into account the cumulative impact of all and increased level of needs to be undertaken. Using the existing parking and traffic conditions as a baseline is unacceptable.

The Transport and Accessibility Strategy states that the SFS redevelopment project does not propose to increase car parking in the precinct compared to existing levels. This appears to contradict the justification for the proposed development.

The documentation submitted as part of the SSD states that the proposal will attract an extra 2.4 million patrons per year to the Moore Park stadiums. This is inconsistent with claims that traffic impacts will not change. A fuller assessment of these impacts is necessary. Any

increase in patrons or events under current traffic condition will clearly significantly impact the operations of the surrounding traffic network and have an even greater adverse impact on adjacent residential areas.

The policy of no additional impact is premised on the capacity public transport, walking and cycling to access the stadium to absorb demand and the unrealistic assumption of reducing the reliance on private vehicles, which are used as the preferred mode of travel by an average of 55% of attendees to all venues.

The only car park under the direct control of the SCG Trust is the use of Moore Park as a car park, which is primarily used for members, officials and players on event days.

The remaining car parking in the precinct comes under the control of other stakeholders, including the Centennial Park and Moore Park Trust, Entertainment Quarter and Sydney Girls High School. The Trust must end parking on the parkland and abandon plans to expand car parks at the golf course, ES Marks Athletic Field and the Entertainment Quarter.

As part of this proposal, it is imperative that the long term parking arrangements for the parklands is resolved, banned and returned to parkland.

Security Considerations

The configuration of the footprint so close to Moore Park Road raises concerns as to the options available to introduce security measures in the circumstances of a significant event. There does not appear to be any perimeter area available to secure the stadium and raises the question of where a perimeter cordon can be introduced being the closure of Moore Park Road the only option available under the current proposed footprint.

Construction Impact

In the event that the proposal is granted consent, the proposed demolition works have the potential to significantly impact on the residential communities and the parklands.

In particular, the Society is concerned that problems could arise from construction workers parking in local streets, noise and dust. It is requested that a community consultative committee be established to include residents of adjoining residential areas.

Summary Conclusion

The Society submits that the proposed demolition of the Allianz Stadium is:

- A shameful waste of public funds in the interests of a sporting elite without due consideration of options and the need for this size facility in this location, on public land;
- An unconvincing business case which dismisses refurbishment of the existing 30 year old Stadium which would be a more economical and sustainable solution;
- No accountability by the Sydney Cricket Ground Trust for its lack of maintenance and lack of meeting standards for the current Stadium;
- A rushed process with just a month for the public to digest numerous EIS documents and restricted public access to key documents;

- Vague concept proposals to facilitate the start of demolition before the State elections, with a Parliamentary Inquiry still in progress and only lip service paid to community consultation;
- A lack of a overall master plan for the Parks precinct which does not locate replacement ancillary buildings to be demolished along with the current Stadium, nor divulge long-term plans, including resolution of car parking for the parklands.
- Demolition of an architecturally esteemed building, listed on the National Trust register;
- The building envelope of the replacement stadium indicates a much larger (twice as high and colosseum-style), of undefined quality, which will dwarf the fine-grain heritage fabric of Paddington and Surry Hills;
- The scale of the building envelope indicates disregard for the setting of the proposed Stadium being primarily driven by the desire for a 'Tier 1 Stadium' and will have a major negative impact on Moore Park, the adjoining Conservation Areas and individually listed heritage items of local, state and national significance.
- Poor consideration of soft landscaping in this vital but diminishing Parks precinct, including tree planting and street setbacks and unnecessary removal of existing trees
- No commitment to cease parking on grassed Moore Park areas during events;
- The unconvincing assessment and mitigation of amenity impacts on the surrounding dense residential area, in particular as a consequence of traffic, increased demand for parking, noise and light spill especially with the contradictory statements concerning assessments based on no increase in use to that existing and increased use forecast for the new Stadium.

The Society therefore reiterates its strong objection to the indicative built form described in the SSD documents and the adverse impact that will result as a consequence of the proposed demolition and wasteful replacement development of a new Stadium.

Yours faithfully



for
Will Mrongovius

President
The Paddington Society