

**Submission  
No 231**

## **INQUIRY INTO SYDNEY STADIUMS STRATEGY**

**Organisation:** City of Sydney

**Date Received:** 25 May 2018

---

25 May 2018

Our Ref: R/2018/4  
File No: 2018/251628

The Hon Robert Brown, MLC  
Committee Chair  
NSW Upper House Inquiry into Sydney Stadium Strategy

By email: [Public.works@parliament.nsw.gov.au](mailto:Public.works@parliament.nsw.gov.au)

Dear Sir,

### City of Sydney Submission to NSW Upper House Inquiry into Sydney stadium strategy

I refer to your email of 20 April 2018 inviting the City of Sydney to make a submission to the Sydney stadium inquiry.

~~The community does not support this proposal and people are appalled by the misplaced priorities and at the shocking waste of public funding and the secrecy surrounding the process.~~

In summary the key concerns relating to the Moore Park stadium proposal include:

- the Government's unwillingness to **release the strategic business case** to justify the proposal.
- The Government's **failure to engage in any meaningful community consultation.**
- **the choice of location:** Why is the Government policy focused on creating major sports and entertainment facilities on the edge of a congested City and Eastern Suburbs with inadequate public transport, when the larger population and demand for such facilities is in Western Sydney?
- **misleading proposal:** This rebuild is not just about sport – it's about creating a multi-complex entertainment precinct. Again, why is this not located in the centre of population in Western Sydney, where there is a much greater demand and significantly fewer facilities?
- **rushed planning process:** Infrastructure NSW has given a timeframe of six months to assess the project. This is an unusually fast determination for a project of this size and complexity. The Government appears to be fast tracking an approval so demolition of the current stadium can occur before the next election.

Attached to your email is the Terms of Reference, which identified the following 10 areas of focus for the Inquiry:

- (a) the process by which the Government developed the strategy, including the input provided by Infrastructure NSW, Venues NSW, the Sydney Cricket Ground Trust and other government agencies,
- (b) modelling or cost benefit analyses that informed the strategy, including the compliance of such modelling or analyses with the Restart NSW Fund Act 2011,
- (c) economic and social justifications for the strategy, including experiences in other jurisdictions and relevant academic literature,
- (d) the development and planning assessment process for Sydney's sports stadiums, including opportunities for public input,
- (e) the management and adequacy of safety and maintenance at Allianz Stadium,

- (f) attendance rates at Sydney's sports stadiums and whether patrons are from Sydney, regional New South Wales, interstate or overseas,
- (g) the total cost of the strategy, including acquisition, demolition, construction, compensation to sports clubs and associations, and the reasons for increases in costs,
- (h) the impacts of the strategy on the community, including users of the Parramatta Memorial Pool and Parramatta Park, and proposed mitigation strategies,
- (i) options to protect, preserve and expand green space at Moore Park, and
- (j) any other related matter.

Following consultation with the elected Council, I provide further comments under the Terms of Reference headings which identified 10 areas of focus for the inquiry:

- (a) the process by which the Government developed the strategy, including the input provided by Infrastructure NSW, Venues NSW, the Sydney Cricket Ground Trust and other government agencies,**

The City requests the Inquiry to note the Government's failure to engage in meaningful community consultation and its unwillingness to commission and/or release the relevant strategic business cases.

The rebuilding of Allianz Stadium and other projects that will impact on Moore Park, including the Alexandria to Moore Park road widening project need to be based on a proper planning and consultation process to ensure the best decision making and planning outcomes.

Given the community's serious concerns about the lack of transparency and the Sports Minister's advocacy for this project, it is not appropriate that he self-approves the project. If the project goes ahead, it must be independently and impartially assessed.

Limited public funds for sports facilities should not be focussed on show-case stadia that underwrite private business interests, but should support grass-roots sporting clubs that build the health and well-being of children, youth and local communities

Not only has it failed to outline the impacts of their decision, the Government has failed to answer why they want to spend close to a billion dollars on a stadium that is rarely full when what NSW desperately needs is more community sporting grounds, public transport and schools.

- (b) modelling or cost benefit analyses that informed the strategy, including the compliance of such modelling or analyses with the Restart NSW Fund Act 2011,**

The Government's announcement of the stadium proposals was without a business case and without any public consultation. Reports suggest the benefit-cost ratio of demolishing and rebuilding Allianz stadium is well below one – meaning it will cost far more than it will ever deliver in benefits.

The business case also needs an economic assessment of the operation of new and upgraded stadia at Olympic Park and Moore Park and the possibility of competition between the venues to secure events. This could result in one or both venues being economically unviable.

The disregard for the most basic principles of proper planning and financial management needs examination and reporting on by the Inquiry.

**(c) economic and social justifications for the strategy, including experiences in other jurisdictions and relevant academic literature,**

As noted in point (b) above the failure of Government to articulate and publicly release a sound business case to justify the proposal needs to be investigated by the Inquiry. The business case needs to include the expected economic and social benefits of the proposal.

With such a large capital expenditure a comparative economic and social assessment needs to be made of a similar investment in community sport and open space development that would support the growing population of Sydney.

Limited public funds for sports facilities should not be focussed on show-case stadia but should support grass-roots sporting clubs that build the health and well-being of children, youth and local communities.

The NSW Office of Sport's website indicates community sports make a \$10 billion contribution to our Gross State Product each year, have 500,000 volunteers and employ 30,000 people. Almost 5 million people are involved in community sport and active recreation in NSW.

The economic investment and benefits in community sport needs to be considered against the stated benefits of the stadium strategy.

In addition it seems that to increase economic viability, the proposal is clearly not only for sport but also as an entertainment complex. The Inquiry needs to examine whether for such a facility the best location would be in Western Sydney where access would be more convenient for the majority of the population.

**(d) the development and planning assessment process for Sydney's sports stadiums, including opportunities for public input,**

In a Minute by the Lord Mayor at the Council meeting of 11 December 2017 (refer attached), concern was raised that the Sydney Cricket Ground Trust legislation 'switches off' the application of the NSW Planning Act to Trust land, exempting the Trust from any transparent or independent process. Instead, the Sports Minister can 'self-approve' development and only needs to 'consult' with the Planning Minister and Public Works Minister. This concern appears to be allayed by more recent events.

It should be noted that it is not the City's general practice to allow for demolition of structures at Stage 1. The only rationale for demolition of the stadium as part of the Stage 1 is to secure its redevelopment in a Stage 2. Therefore it is critical that the Stage 1 application is properly assessed in terms of future social, economic and environmental impacts.

More recently, the NSW Department of Planning and Environment (DPE) issued Secretary's Environmental Assessment Requirements (SEARs) on 3 May 2018. The SEARs identifies the assessment and consultation requirements for preparation of a future Environmental Impact Statement. This followed a SEARs request from Infrastructure NSW (INSW) to allow preparation of a conceptual development application for the redevelopment of Sydney Football Stadium concurrently with works comprising demolition of the existing stadium (State Significant Development application SSD 9249).

These indicate that INSW is committed to the lodgement of a State Significant Development application and that the development and planning assessment process for the Sydney Football Stadium will likely follow a transparent process.

On this basis, the City is supportive of the proposed planning assessment process. It is expected that this process will include making the INSW application and all supporting documentation publicly available on the DPE website, inviting the City and the public to review

and comment on the proposal, and to make publicly available the DPE assessment report and recommendation, and the final determination.

**(e) the management and adequacy of safety and maintenance at Allianz Stadium,**

One of the justifications for the demolition of the Allianz Stadium is poor asset condition and associated safety issues. Asset management plans, maintenance programs and capital expenditure since the opening of the stadium in 1989 needs to be examined by the Inquiry.

Scrutiny of these documents will allow an assessment of the adequacy and competence of the required safety and maintenance responsibilities undertaken by relevant bodies in particular the Sydney Cricket & Sports Ground Trust.

**(f) attendance rates at Sydney's sports stadiums and whether patrons are from Sydney, regional New South Wales, interstate or overseas,**

The public release of attendance rates would be informative in assessing a business case for the proposal. By examining the range of events, fixtures and attendance rates it might be ascertained that the majority of future events could be better accommodated and catered for the majority of patrons at Olympic Stadium.

Average NRL fixtures only attract a crowd of up to 15,000 people. The number of seats proposed is 300% more than current attendance rates

From a strategic point of view, it would make sense to focus major sporting/entertainment facilities where they are most conveniently accessed by the majority of Sydney's population which is at Olympic Park. The merit of locating such facilities on the edge of a congested City centre needs to be assessed by the Inquiry.

**(g) the total cost of the strategy, including acquisition, demolition, construction, compensation to sports clubs and associations, and the reasons for increases in costs,**

The total project costs, beyond stadium construction costs, include the entire range of activities required to support the implementation of the stadium proposal including compensation to sports clubs. This needs to be publicly released to allow scrutiny of the business case to support the project.

In addition it needs to be revealed whether one of the drivers of the Alexandria to Moore Park road widening project is to improve vehicle access for stadium patrons and that a component of this road project cost needs to be attributed to the overall cost of the stadium strategy.

**(h) the impacts of the strategy on the community, including users of the Parramatta Memorial Pool and Parramatta Park, and proposed mitigation strategies,**

The Allianz Stadium proposal cannot be considered in isolation when assessing community impacts in the Moore Park area.

Other proposed projects in the Moore Park precinct include the lease of the Hordern Pavilion and the Royal Hall of Industries, proposals to redevelop the Entertainment Quarter and the Alexandria to Moore Park Connector.

Collectively these projects as well as the stadium proposal need to consider the impacts on:

- (i) open public green space, loss of trees and impacts to heritage;
- (ii) Driver Avenue and Kippax Lake and the implications on the ANZAC memorial;

- (iii) local traffic congestion and car parking facilities and flow on impact into the City of Sydney and surrounding communities. The combination of the sporting stadia and the widened road to accommodate the Alexandria to Moore Park Connector from St Peters Interchange to Anzac Parade is a recipe for further gridlock.
- (iv) disruption to the surrounding residential (conservation) areas and parklands from demolition, construction and operations, which will not only include sporting events but large music concerts.
- (v) public transport capacity;
- (vi) commercialisation of public land; and
- (vii) precinct character, amenity and sustainability;

**(i) options to protect, preserve and expand green space at Moore Park, and**

The construction footprint of a Moore Park stadium must be contained within the footprint of the existing stadium structure. The threat of encroachment and expansion into Moore Park green space through use of Driver Ave or Kippax Lake parkland must be addressed to ensure protection of the Parklands.

In addition, it needs to be ascertained whether an expanded events calendar at the Moore Park Stadium will result in the ongoing use of the **Moore Parklands for spectator parking** thereby reducing public access and usability of open space for wider public recreation use.

All parking should be taken off the grass and be restricted to the new facility particularly given that light rail will act as a new mode of transport for people coming to the stadium sections of Moore Park.

Twenty million people visit the Centennial and Moore Parklands annually, while two million attend Allianz stadium and the SCG. Given that three out of every four people in the City of Sydney live in an apartment, Moore Park is essential to supporting an ever increasing surrounding denser residential population.

Should you wish to speak with a Council officer about this submission please contact Laurie Johnson, Program Manager Public Domain by telephone on \_\_\_\_\_ or by email at \_\_\_\_\_

Yours sincerely

**Kim Woodbury**  
Acting Chief Executive Officer