INQUIRY INTO SYDNEY STADIUMS STRATEGY

Organisation:

North Parramatta Residents' Action Group

Date Received: 25 May 2018



Inquiry into the Sydney stadiums strategy Written submission of the North Parramatta Residents Action Group

25 May 2018

To: Director Public Works Committee NSW Legislative Council Parliament House By email: Public.Works@parliament.nsw.gov.au

The North Parramatta Residents Action Group (**NPRAG**) is pleased that as part of this Upper House Inquiry, the Public Works Committee will examine the Government's decision to demolish Parramatta War Memorial Pool in order to expand the seating capacity of Parramatta (Pirtek) Stadium – rebuilt as a new Western Sydney Stadium.

NPRAG is a large community group whose members comprise concerned citizens of the greater Parramatta area and beyond. NPRAG is committed to promoting the preservation and activation of Parramatta's publicly owned parklands and public landscapes in order to enhance the historical, cultural, economic and social capital of our city, while showcasing it to the world. More information about NPRAG's membership and campaigns are set out in **Attachment A**.

This submission specifically addresses items 1(d) and 1(h) of the Inquiry's Terms of Reference, which provide:

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

(h) the impacts of the [Government's Sydney stadiums] strategy on the community, including users of the Parramatta Memorial Pool and Parramatta Park, and proposed mitigation strategies,

In the five points we canvas below, we set out the *context* within which the Government decided to pursue a rebuild of the existing Parramatta Stadium. The story told by that context without doubt calls into question the integrity of the Government's decision-making for the people of Parramatta and Western Sydney through its stadiums strategy.

1. The Government sought to expand the seating capacity of an existing Parramatta Stadium that was on average under-used and rarely reached Stadium capacity

The seating capacity of the existing Parramatta Stadium was 20,700. Whilst the Environmental Impact Statement for the Western Sydney Stadium Stage 1 DA (**EIS**) refers to some "top attendance figures" recorded at that Stadium – the reality is that on average, attendance rates rarely reached anywhere near Stadium capacity. Table 3-1 in the EIS titled "Typical event calendar and attendance" listed the following existing average attendance:

• Parramatta Eels games – 13,300

...

• Western Sydney Wanderers games – 13,500

The EIS' projected growth of a "10% uplift" to those figures as a result of the Stadium rebuild still falls well within the bounds of the existing Stadium capacity. Even taking into account the "top attendance figures" referred to in the EIS for the period 2005 to 2009, Parramatta Stadium only reached near capacity at a rate of about once a year.

The EIS does not provide any "top attendance figures" post-2009. Interestingly, the annual reports of Venues NSW on stadium attendance for Pirtek (Parramatta) Stadium from July 2012 and onwards (when Venues NSW took over the responsibilities of the Parramatta Stadium Trust) do not provide any statistics on attendance per event at the Stadium.

NPRAG's research shows that in relation to rugby league games post-2009, it appears that Parramatta Stadium only reached near capacity once in 2012 (19,654 on 29 April 2012 – this is also evidenced in Venues NSW 2012 Annual Report), once in 2011 (19,654 on 8 July 2011) and twice in 2010 (19,824 on 31 July 2010 and 19,854 on 22 August 2010). Each of these instances still did not reach 96% capacity. Interestingly, from 2013 up until when the Stadium was closed for the rebuild, **no rugby league games reached near Stadium capacity.** (source: http://www.rugbyleagueproject.org). In relation to Western Sydney Wanderers games, statistics indicate that attendances only reached near capacity on two occasions in 2013 and 2014, and only on one occasion in each of 2015 and 2016 (source: www.ultimatealeague.com).

The primary objective of the Government's stadia strategy for the Parramatta area was to expand Parramatta Stadium to accommodate an additional 10,000 spectators – however the actual attendance figures themselves do not justify this objective, and thereby do not justify the \$300 million commitment of public money to achieve it. Unfortunately for the residents of Parramatta, it was this very objective that was the driving force for a larger Stadium footprint necessitating the closure and demolition of the adjacent Parramatta War Memorial Pool. Whilst the Government have been promoting a narrative around the "need" for a newly expanded Western Sydney Stadium to cater for the residents of Parramatta and beyond, arguing that a modern, up-to-date Stadium facility will contribute to Parramatta's attainment of the status of Sydney's second-CBD, ultimately, we at NPRAG ask: but at what opportunity cost? Given that even the most basic rationale for an expanded Stadium does not past muster taking into account raw attendance figures – is it not a failure in responsible public-policy planning and expenditure that the Government chose to allocate \$300 million to this Stadium development at the expense of the closure and demolition of a significant public facility of historical value that was central to the cultural and social identity of the Parramatta area. And indeed, what of the other opportunity costs? The loss of \$300 million which could have been invested in public infrastructure, education and health care, benefitting the residents of Western Sydney. Perhaps the Department of Planning's summation of the Government's justification for the new Stadium in its assessment report is most telling: "the new expanded stadium will provide sporting franchisees with the ability to generate greater commercial returns".

2. In order to deliver the Government's proposed design for the new Western Sydney Stadium, the Government would close down and demolish Parramatta War Memorial Pool, a major public recreational facility also of significant historical value

The existing Parramatta Stadium was adjacent to the Parramatta War Memorial Pool. The proposed design for the new Western Sydney Stadium necessitated its demolition.

Firstly, the Parramatta War Memorial Pool was of significant historical value, established as a war memorial in 1959 to commemorate fallen and returned servicemen and women, particularly from World War II. It was still being used as a site for Anzac Day dawn services in Parramatta. The fact that this was not even taken into consideration by the Government in its decision-making for the area shows an utter disregard to the memory and legacy of our local forebears, and a disregard for the iconic status of the Parramatta War Memorial Pool

Secondly, Parramatta War Memorial Pool was established to meet a "pressing need" in the local community for a recreational facility of that kind. **Attachment B** is an archival image of a flyer calling for a public meeting on 27 February 1956 to discuss the need for a local pool. Local residents partially funded the Pool at the time of its establishment. Up until it was sadly opened to the public for the last time on 31 March 2017, the Pool extensively serviced the local community:

- 160,000 visits per annum;
- 3,300 Learn to Swim enrolments over 75% participants lived locally in the suburbs of Parramatta, North Parramatta, Westmead;
- 35 swimming carnivals;
- 14 primary school learn to swim programs;
- 5 high school learn to swim programs;
- home to the Parramatta Memorial Swim Club;
- home to the Parramatta Water Polo Club;
- over 70% of casual swimmers and members live locally.

Only 7 years prior to its demolition, the Pool underwent a \$10 million rate payer-funded upgrade and renovation. It defies logic that taking all of this into account, the Government would simply accept the inevitability of the Pool's demolition in preference for a Stadium the justification for which is found wanting.

It is disappointing, and a failure in public policy planning, that as at the date of writing this submission, the community is back in the position it was in the 1950s when it first lobbied for the establishment of Parramatta War Memorial Pool. As there currently remains no access to a public pool facility in the City of Parramatta, and given the forecasted high-density population increase in Western Sydney (being imposed by the Federal Government, and supported by the Greater Sydney Commission), the Government's planning (or lack thereof) in this regard puts at risk the safety of our children and the wider community. As at the date of writing this submission, the community, including local schools, still do not have access to a public pool, and the plans for a replacement pool suggest this will remain the case until mid-2020. Even the temporary "alternative", being the expansion of the pool at Macarthur Girls High School, remains indefinitely incomplete. The local media have been reporting on the impacts of the Pool closure on children and their families, who have to travel out of area in order to participate in learn to swim classes (see for example,

https://www.dailytelegraph.com.au/newslocal/parramatta/students-left-without-a-poolas-learntoswim-classes-begin-in-parramatta/news-

story/ca07571ba6f3bde7744bacd90015ff64).

As the mid-2020 timeframe for completion is already blown out from previous timelines proffered by Council and the Government, this completion date should be seen as very optimistic and unlikely to be met. This is particularly the case as there remains a question mark over the funding of the replacement pool, whereby the \$30 million committed by the State Government falls short of what is required to take the proposed new aquatic centre facility to completion, based on the business case recently endorsed by City of Parramatta Council (see Business Case,

https://www.cityofparramatta.nsw.gov.au/sites/council/files/inline-files/Final%20Business%20Case%20December%202018.pdf)

Another aspect of the Stadium's design that raised concerns for the community was the Concept Proposal's reference to 20,000 square metres of "future ancillary uses" complementary to the Stadium that remained undefined in the EIS. The possibility that the Stadium's design could have been altered to avoid the Pool if the Concept Proposal did not have to also accommodate 20,000 square metres of commercial and private enterprises ancillary to the Stadium is alarming. NPRAG believes that such planning imputes incompetence at best, and at worst utter contempt for the local community, within the decision-making structures of Government driving this stadium strategy.

3. At the time the development application for the new Western Sydney Stadium was approved, there was merely a vague plan for a "replacement" pool facility – but even that plan involved the further degradation of public space, being Crown Lands that are a part of Parramatta Park

Item 1(h) of the Inquiry's Terms of Reference refers to the Government's "proposed mitigation strategies" in respect of the impact of the Government's stadium strategy on the community. The only "proposed mitigation" measure to address the significant adverse impacts of the demolition of the Parramatta War Memorial Pool was, to put it bluntly, wholly inadequate. At the time of the EIS' preparation, all that the Government had committed to was to undertake a feasibility study into potential locations for a replacement Pool on Crown Land managed by the Parramatta Park Trust. Indeed, Sports Minister Stuart Ayres in Budget Estimates stated in August 2016 that the Government was under no obligation to fund a replacement Pool for the residents of Parramatta. Eventually, it was proposed to use land at the "Mays Hill site", which is land held by the Parramatta Park Trust under the Parramatta Park Trust Act 2001 and adjacent to the world heritage listed Parramatta Park. This further incursion into Crown Land is not a "mitigation strategy" because it itself simply gives rise to further adverse cumulative impacts – as yet another example of the erosion of public space in Parramatta. The 18 August 2016 minutes of a special meeting of the Heritage Council of NSW observed that the relocation of the pool to the "Mays Hill site" would disturb highly sensitive and significant archaeology and views. Despite such hurdles and issues plaguing the Government's "proposed mitigation" measure, the development application proceeded to a determination in favour of the Government proponent Venues NSW and paved the way for bulldozers to immediately demolish Parramatta War Memorial Pool.

4. There was a total lack of any genuine community consultation – it was a mere afterthought, undertaken superficially by the Government when the fate of the Parramatta War Memorial Pool was already a foregone conclusion

NPRAG was at the forefront of the expression of community outrage at the Government's decision to demolish Parramatta War Memorial. **Attachment C** sets out a timeline of NPRAG's advocacy and campaign to save the Pool. NPRAG's "Save Parramatta Pool" change.org petition received 3,625 supporters. (see *https://www.change.org/p/save-parramatta-pool-from*

demolition?recruiter=210549546&utm_source=share_petition&utm_medium=facebook&ut m_campaign=share_for_starters_page&utm_term=des-md-no_src-no_msg&fb_ref=Default

As the Government proponent for the new Western Sydney Stadium, Venues NSW did not consult with the local community, including pool users, during the preparation of the EIS for the Stadium's Stage 1 DA - this was despite the fact that the Secretary's Environmental Assessment Requirements (EARs) explicitly required consultation with relevant "community groups" during the preparation of the EIS. Given that the EARs also explicitly required Venues NSW to assess the social impacts of the demolition of the Pool, it defies logic that Venues NSW did not engage with and consult the local community *on this specific issue*. Venues NSW completely failed to seek out the views of the community on the fact that the Pool would be demolished as a consequence of the stadium design, without any certainty as to an alternative or as to the likely cost to ratepayers for any "replacement" facility. The so-called "community consultation" carried out by Venues NSW focused exclusively on ascertaining the views of potential stadium users on the expansion of Parramatta Stadium. All that Appendix D (Consultation) of the EIS stated in respect of community consultation was that: "Two Fan Forums were held on 18 January and 9 February 2016. The forums included representatives from the NRL teams – Bulldogs, West Tigers and Parramatta Eels, the Western Sydney Wanderers and from Football Federation Australia". This was confirmed to NPRAG at its 15 August 2016 meeting with Venues NSW, during which

NPRAG was told that consultation was limited to rugby league and A-league stakeholders such as the NRL, AFL, the Parramatta Eels and the Western Sydney Wanderers.

Appendix N to the EIS titled "Socio-economic" assessment evaluated the impacts of the Pool's demolition on the community as follows:

Temporary loss of aquatic centre facilities would have a <u>negative impact</u> on the local community and would affect a broad range of members and users, including seniors, young children and their families, recreational and sport swimmers, as well as local schools for swimming carnival and swimming lesson uses. These users would need to find similar facilities elsewhere during this time, which may not be feasible for some users given increased travel distances as well as differences in the availability of services such as senior's classes, differing facilities such as those suitable for young children or parents with prams, and differing membership arrangements and entry fees. Members and users of the existing Parramatta Swimming Centre <u>may perceive the loss of this facility as a change to the local area's sense of place and local identity, and may result in a loss of sporting and recreational activity for users who are unable or unwilling to <u>utilise alternate facilities</u>.</u>

<u>Primary schools and high schools within the local area may also experience difficulty in</u> <u>sourcing alternate venues for swimming carnivals or school swimming lesson programs</u> with increased competitiveness for use of such facilities by a large number of schools across the Greater Sydney region. Increased costs may also result from a need to transport students over greater distances to facilities in other areas.

The above EIS assessment highlights at a cursory level the adverse impacts associated with the Pool's demolition – imagine what else Venues NSW could have added to the above evaluation if it *actually consulted* the local community about the loss of the Pool! The lack of community engagement early on in the policy and strategic planning process is also evidenced by the fact that Parramatta's own MP, Dr Geoff Lee, was himself "in the dark" about the Pool's fate (see timeline at **Attachment C**).

NPRAG asks – what would have been the Pool's fate if Venues NSW did in fact do as it should have and adequately complied with the Secretary's EARs to seek out the community's views? Would Venues NSW have had a better gauge on the significant adverse impact of the Pool's demolition and therefore more readily consider alternative design plans for the proposed Stadium that meet the supposed "need" for an expanded Stadium <u>and</u> enabled the retention of the Pool? Perhaps this would have fed into the Government's decision-making and resulted in a more sensible stadium "strategy"? It seems awfully convenient that the EIS effectively "evaded" the level of community opposition to the Pool's demolition by not directly engaging with the local community – such that any alternative designs were not interrogated. Accordingly, by the time the EIS was formally exhibited for public comment, the fate of the Pool was a foregone conclusion. Surely one of the functions of an EIS is to at least *consider* reasonable, alternative layouts for a proposal in order to mitigate, or indeed preferably *avoid*, any significant adverse impacts of the proposal. This is indeed the very essence of an EIS and should have been the case in respect of the Western Sydney Stadium EIS. In fact, that EIS was indeed supposed to *"justify* the proposed built form" (see point 3. of the Secretary's EARs). Imagine what the fate of the Pool would have been if Venues NSW had engaged with the community during EIS preparation such that it had a better gauge on the level of community opposition and had been better informed of the potential for the Pool and expanded Stadium to co-exist? (as set out in Section 5 of this submission).

The only reason NPRAG was able to mobilise community opposition to the Government's plans and hold public rallies in early 2016 before the formal public exhibition of the EIS, was because of a leak to the media of a Venues NSW report which showed the fate of the Pool in order to accommodate the Government's concept proposal for Western Sydney Stadium (see for example this media article https://www.fairfieldchampion.com.au/story/3833515/in-the-deep-end/?cs=1497). This sparked community outrage at the unacceptability of losing a public swimming pool facility that also held an important place in the historical, cultural and social identity of Parramatta. As can be seen in the timeline at **Attachment C**, notwithstanding the subsequent groundswell of community opposition, Venues NSW still <u>did not</u>, prior to completion and submission of the EIS, consult with the local community about the Pool's fate. As the timeline at **Attachment C** demonstrates, the *first time* Venues NSW as the proponent contacted NPRAG identifying it as a stakeholder in its proposal for the Western Sydney Stadium was on 26 July 2016 once exhibition of the EIS had commenced and only once NPRAG had communicated its concerns to the Department of Planning and Environment. On 24 August 2016, NPRAG submitted its submission on the EIS (extracted at **Attachment D**). Unfortunately, it was already too late for community consultation in relation to the actual design of the new Stadium and too late for the community to be able to persuasively put forward arguments around designing the new Stadium so that it could co-exist with the Pool. By the time the EIS was assessed by the

Department of Planning and Environment, there was a mere fleeting reference in the Department's assessment report to the "negative social impact" that the demolition of the Pool would have, but that such an impact would be "temporary" and therefore justifiable. The lack of genuine consultation was further exacerbated by the fact that City of Parramatta Council was operating under a State Government appointed administrator, rather than elected local officials who could genuinely advocate for the views of their constituents.

5. The community who tirelessly lobbied to save Parramatta Memorial Pool and prevent any further degradation of Parramatta Park lands were able to demonstrate, through the engagement of architecture firm Figgis and Jefferson Tepa, that the Pool and Stadium could co-exist as a vibrant, recreational hub for the City of Parramatta

From publicly raised money, NPRAG engaged the architecture firm associated with the original War Memorial Pool, Figgis and Jefferson Tepa, to assess whether the Parramatta War Memorial Pool could remain and co-exist with an enlarged Parramatta Stadium. As part of its concept planning, Figgis and Jefferson Tepa describe the characteristics of the Pool that make it representative of the post-war era and its iconic 1960s design elements. **Attachment E** sets out a description and architectural drawings of Figgis and Jefferson Tepa's concept to preserve Parramatta War Memorial Pool whilst still accommodating an expanded Parramatta Stadium. The principal elements for their concept plan are:

- The stadium footprint has been shifted and re-oriented slightly to provide adequate space between the stadium structure and the existing pool spectator seating.
- In order to minimise the stadium's footprint, the plan suggests car parking and vehicular access points located beneath the playing field and structure.
- The plan shows an aerial connection between the stadium and the Southern O'Connell street approach. The aerial connection would fly over the pool complex with little effect on the operation and amenity of the Parramatta War Memorial Pool.
- It is envisaged that the aerial link be anchored at O'Connell street with a "celebratory" building announcing the gateway to the park precinct and forming a

worthy landmark adjacent to the O'Connell street bridge.

- The celebratory building mentioned above could well provide community recreation facilities and services, acting in concert with the Pool and Stadium.
- Above the "celebratory" building the plan suggests refreshment facilities, cafes and similar venues providing social meeting spaces and interaction.
- A further extension to the plan would be to reconstruct the present car parking area underground. By these means, the recreational and scenic quality of the River Bend can be restored.
- At the northern precinct of the site, the plan suggests a great deal of fore court area and transport interchange serving both the Stadium and the Parramatta War Memorial Pool.

In March 2017, NPRAG wrote to the Honorable Minister Andrew Constance, Minister for Transport and Infrastructure, to remind him that the residents of Parramatta had not accepted that it is too late to save the Pool notwithstanding approval of the Western Sydney Stadium DA in December 2016. NPRAG shared with Mr Constance the solution the community has come up with together with Figgis and Jefferson Tepa, a solution that enabled the Pool and an expanded Stadium to co-exist. In the email (extracted at Attachment G), NPRAG requested a meeting with Mr Constance and our architect Stephen Figgis, and implored Mr Constance to "cancel the scheduled demolition of Parramatta War Memorial Pool on March 31st. To then pause the stadium project for a minimum of 6 months to allow for genuine and transparent consultation allowing alternative planning of this Sports Precinct ensuring that the stadium and the pool can continue to coexist. This is a once in a life time opportunity to create a landmark precinct of healthy, inclusive space for community to exercise, socialise and watch professional sport - make this one of your greatest legacies!". Unfortunately, yet again the Government was not receptive to NPRAG's request to at the very least meet and share the community's alternative solutions - no response was received from Mr Constance's office.

CONCLUSION

In summary, the matters canvased in this submission call into the question the integrity of the decision-making processes that took place in relation to the planning and

implementation of the Government's Stadiums Strategy. It is clear that the rationale for the construction of Western Sydney Stadium, the associated demolition of Parramatta War Memorial Pool, the failure of community consultation, and the failure to take into account alternative concepts, ought to be subject to rigorous scrutiny. Thank you for the opportunity to contribute to this process.

Prepared by: North Parramatta Residents Action Group Suzette Meade (President – NPRAG)

and

Stephen Brancatisano (Vice President - NPRAG)

This submission has been authorised by the executive committee of NPRAG

Attachment A

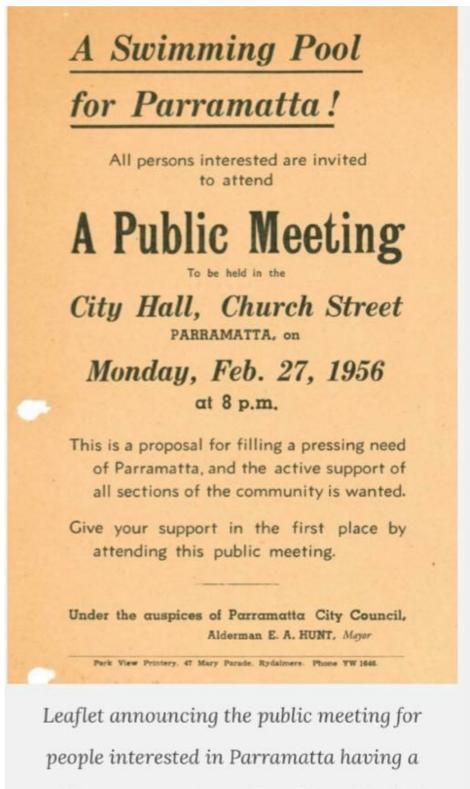
NPRAG was formed in January 2015 in response to the public exhibition in November/December 2014 of the Parramatta North Urban Renewal (**PNUR**) Project proposal by Urban Growth NSW to rezone and effect changes to State and Local planning legislation relating to the Cumberland and Sports & Leisure Precincts contained within the PNUR Project site. Since that time, NPRAG has engaged in the following:

- held the Fleet Street Heritage Precinct Symposium (September 2015) with speakers from interstate including Heritage Tourism experts, Academics in Planning and Heritage, National Trust of Australia (NSW), Parramatta Chamber of Commerce and community. This was to discuss better visions for the Fleet Street Heritage Precinct and deliver better outcomes for Parramatta's heritage tourism future.
- the delivery of over 35,000 flyers providing information about the Fleet Street Heritage Precinct.
- the generation of countless local and broadsheet newspaper articles.
- participation in community and ABC 702 radio interviews, TV coverage on Australia Wide, ABC, and all commercial networks.
- presentations regarding the Proposal supported by our architecturally designed images demonstrating the true extent of Urban Growth's Proposal, including to Parramatta Chamber of Commerce.
- implementation of site tours to politicians, academics, tourists and media.
- thousands of letters and emails sent in pursuance of the campaign and meetings with Ministers, Members of Parliament and the legal fraternity to argue our case.
- submissions and witness testimony at two upper house parliamentary inquires (Mismanagment of Crown Land and Funding of Museums and Galleries).

In addition, NPRAG has been involved in advocating against the loss of public land in relation to the proposed Parramatta Light Rail project, and has also campaigned extensively against the Government's decision to demolish Parramatta War Memorial Pool (for details of this campaign, see **Attachment C** to this submission).

Attachment B

1956 flyer calling for public meeting to discuss need for pool



pool. Parramatta Council Archives File 52/2

part 1

Attachment C

Timeline of NPRAG's campaign to save Parramatta War Memorial Pool

November 2014

Urban Growth NSW release proposed masterplan of North Parramatta Heritage Precinct and Sport Precinct. This illustrated residential development on top of the Pool (70 units and 25,4500 sqm commercial).

See Figure 4.3.5.2 ILP PNUR (Page)

https://majorprojects.accelo.com/public/674db421e8eed8d9abfb8a8315711c20/2.1%20P NUR%20Draft%20Development%20Control%20Plan%20Amendment.pdf

January 2015

NPRAG and media question Parramatta MP Dr Geoff Lee on future of the Parramatta War Memorial Pool – his response was " "There are no talks about getting rid of the pool. Our pool is a great pool and well-established, and it would cost too much," (see article source here : <u>https://www.dailytelegraph.com.au/newslocal/parramatta/parramatta-pool-safefrom-developers-after-assurances-the-swimming-centre-wont-be-moved/newsstory/792dcb0066a3191c3d69b31d14ae1282</u>

Early 2016

Venues NSW concept proposal for Western Sydney Stadium leaked to the media, which confirmed fate of the Parramatta War Memorial Pool. Lord Mayor of Parramatta (prior to forced amalgamation in May 2016), Councillor Paul Garrard, states Council would prefer the Pool to stay at the site.

https://www.dailytelegraph.com.au/newslocal/parramatta/parramatta-pool-will-bemoved-to-make-way-for-the-redevelopment-of-pirtek-stadium/newsstory/b55d014e281c070cfaa6bddd22ab9fd3

21 February 2016

NPRAG hold public meeting / rally to save Parramatta War Memorial Pool with its Swimming Club. City of Parramatta Councillors, Opposition Leader Luke Foley and Parramatta MP Dr Geoff Lee were in attendance.

24 March 2016

Secretary's Environment Assessment Requirements issued for Environmental Impact Statement for Western Sydney Stadium proposal.

2 April 2016

NPRAG hold public rally to save the Pool.

5 June 2018

NPRAG organised major rally to save the Pool, held at the Parramatta War Memorial Pool despite red weather warning due to flooding rains. Despite the extreme weather, about 150 people in attendance demanding that the Pool not be demolished as part of the Stadium rebuild.

21 July 2016 to 19 August 2016

Exhibition of the EIS for Western Sydney Stadium.

26 July 2016

NPRAG makes formal request to the Department of Planning & Environment Secretary Carolyn McNally to extend submission period on the EIS exhibition due to Venues NSW's failure to adequately consult with the community during the preparation of the EIS, as required by the Secretary's EARs. This request is refused. NPRAG advises of intention to make a formal complaint to Minister for Planning, Rob Stokes (email chain is at **Attachment F** to this submission).

26 July 2016

Hours after NPRAG's request to extend the submission period of the EIS, Venues NSW Director of Pirtek Stadium contacts NPRAG identifying it as a stakeholder in the Western Sydney Stadium EIS and requesting to hear community's concerns. The was the first time Venues NSW made contact with NPRAG.

27 July 2016

The Department of Planning and Environment, Priority Projects Assessments team, refuses to "pause" exhibition of the EIS at the request of NPRAG.

2 August 2016

NPRAG sends letter to Minister for Planning Rob Stokes requesting an urgent meeting (see **Attachment H**). No response was received.

15 August 2016

Meeting between NPRAG executive committee members and Luke Coleman of Venues NSW

24 August 2016

NPRAG lodges submission objecting to Western Sydney Stadium EIS (see submission at **Attachment D**).

August 2016

Sports Minister Stuart Ayres in Budget Estimates responds to calls from community for funding for a replacement public pool "Parramatta Council is getting quite a good result out of this government, its getting a new museum and a new stadium, significant investment in roads and state government having to RELOCATE the council owned pool does not require an obligation for them to fund a replacement".

November 2016

NPRAG commission Figgis & Jefferson Tepa architects (son of original pool architect Landon Figgis – Stephen Figgis) to design a concept that demonstrated an inclusive sports precinct where the Parramatta War Memorial Pool and new stadium could continue to co-exist.

7 December 2016

Development application for Stage 1 of Western Sydney Stadium granted.

11 December 2016

NPRAG hold public rally in Parramatta Square showing the concept designs of the Pool and stadium co-existing (see https://www.fairfieldchampion.com.au/story/4345987/pool-and-stadium-can-co-exist/

27 February 2017

NPRAG hold public forum commemorating public meeting called on same day on 27 February 1956 to discuss community need for a pool – panelists were Dr Geoff Lee (Parramatta MP), David Shoebridge (Greens MP), Lynda Voltz (Shadow Sports Minister), Architect Stephen Figgis, Vice-Principal of St Patrick's Primary School. Over 300 community members packed the hall at Burnside Primary School in a heated debate over the future of the Pool, no plans for new pool to be built prior, no funding for pool after Minister for Sports Stuart Ayres advised in Budget Estimates that state government is under no obligation to fund relocation of the pool.

7 March 2017

NPRAG emailed the Hon Andrew Constance, Minister for Transport and Infrastructure requesting a meeting with NPRAG and architect Stephen Figgis to share the concept proposal that the Pool and Stadium could co-exist (see **Attachment G**). No response was received.

31 March 2017

Final day of the Parramatta War Memorial Pool operating for the public. The NSW Government announces \$30 million funding towards a new aquatic centre.

1 April 2017

Parramatta War Memorial Pool closed for demolition.

Attachment D

NPRAG submission on the EIS

NORTH PARRAMATTA Residents Action Group Inc

24th August 2016

Re: - Western Sydney Stadium (Concept & Stage 1 Demolition)

As identified by Department of Planning, Venues NSW and Infrastructure NSW as stakeholders of the proposed Western Sydney Stadium, NPRAG object to the current EIS on exhibition for the Western Sydney Stadium.

The following issues formulate our official objection:

1. FAILURE TO CONSULT

The SEARs Report issued by Department of Planning states under Consultation that "During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners" The Consultation Report (Appendix D - Consultation Stakeholder and Community Consultation Outcomes Report lodged by Venues NSW reports under Community Consultation 3.3.1 "Two Fan Forums were held on 18 January and 9 February 2016. The forums included representatives from the NRL teams – Bulldogs, West Tigers and Parramatta Eels, the Western Sydney Wanderers and from Football Federation Australia"

Observing communities discontent with a proposal and reporting on it IS NOT CONSULTATION.

Holding community Pop -In's at malls and train stations with artist's impressions of a new stadium AFTER the EIS is submitted IS NOT CONSULTATION.

Therefore, we believe Venues NSW and Infrastructure NSW did not comply with the Department of Planning SEARs report by consulting with community groups <u>during the preparation of the EIS</u>. The EIS is premature and should be pulled from exhibition and meaningful consultation with the wider community be carried out and a new consultation report submitted again with a new EIS submission.

This proposal, will affect a community ratepayer funded facilities future and the change of use of a public parkland. Therefore, this proposal needs careful and considered consultation with the community.



WEB SITE www.nprag.org

2. FAILURE TO CLEARLY IDENTIFY EIS is FOR DEMOLITION OF POOL

The EIS did not make clearly identifiable that the EIS is a Development Application for the Demolition of Parramatta War Memorial Pool. It only listed this as a consequence of the proposed site the stadium would prefer to take instead of utilizing the Stadium Trust land. The EIS also falsely reported that the State Government had announced that a new aquatic centre would be built. This is not the case. The Minister for Sports announced a commitment to carry out a feasibility study for possible location of the centre being on Crown Land under management of Parramatta Park Trust. There is no commitment from the NSW Government or Parramatta City Council for the funding for a like for like swimming facility.

3. FAILURE TO IDENTIFY CROWN LAND

The EIS does not correctly identify in its proposal for a 'border re-alignment' or land swap that the land currently leased by Parramatta City Council for Parramatta War Memorial Swimming Centre is land managed under Parramatta Park Trust Act which is Crown Land. There is no mention of the Minister For Lands – Niall Blair being involved in consultation regarding this land changing use.

4. NO FEASIBLITY STUDY CARRIED OUT FOR ALTERNATIVE LOCATIONS

Venues NSW and Infrastructure NSW have failed to consider the option of reorienting the proposed stadium on the existing site so that the existence of a much loved and much used community facility is not jeopardized. There are identifiable locations the Parramatta LGA – the most significant being the Rosehill Gardens & Camelia Urban Renewal Precinct. This location is a shorter distance to walk from Parramatta Station, and also has an existing heavy rail line station that stops at Rosehill Gardens. The proposed light rail from Westmead to Olympic Park will run through this precinct. Road traffic including cars and buses would have fast and easy access to M4, James Ruse Drive, Pennant Hills Road and Great Western Highway. Unlike the existing Stadium location on O'Connell Street, Parramatta which is a bottle neck of road traffic, which will only increase with the proposed school to be built in Old Kings School, the 77 apartment development on corner of O'Connell and Victoria Road, and the redevelopment of the Heritage Precinct in Fleet Street North Parramatta.

5. COST BENEFIT ANALYSIS

It has not been identified what the true cost benefit to spending \$350 million on only increasing a stadium by 8000 seats which equates to \$41,000 a seat expansion. The current stadium is rarely at capacity for rugby league games. Western Sydney Wanderers have clearly identified they would like a much bigger stadium than the one proposed.

A larger stadium could be built at Blacktown International Sports Park with the added bonus that the World Heritage Listed vista from Old Government House would not be compromised. This site is easily accessible by road or rail and would significantly boost this precinct in the Blacktown LGA which is set to expand its population by 300,000 in 20 years.

6. WORLD HERITAGE VISTAS COMPROMISED

The World Heritage Vistas of Old Government House will be compromised by a development of this size. Relying on a tree line that will eventually end its natural lifecycle will render the listing exposed. If Parramatta truly wants to be a great city and build long term tourist economy, it will need to protect its world heritage listed treasures. Domestic and international tourists do not visit an area to view a football game, they come to learn about its history, its unique past and how that community respects and embraces its past. We cannot see busloads of tourists stopping off from their trip to the Blue Mountains to visit Parramatta for a football stadium.

On behalf of the residents of Parramatta who we represent the process is fatally flawed as it does not comply with a number of significant requirements in law and the documentation was misleading and therefore the DA should be rejected and the process restarted. This EIS is premature, ill planned and an unwise move by the NSW government to go against the wishes of the majority of its constituents.

Kind Regards

Suzette Meade President

Attachment E

Concept plan and architectural drawings of Figgis and Jefferson Tepa

FIGGIS & JEFFERSON TEPA PTY LTD P 02 9438 5555 F 02 9439 5163 E studio@figgis.com.au W figgis.com.au





CONCEPT FOR PRESERVATION PARRAMATTA WAR MEMORIAL POOL

1. Background

The Parramatta Pool complex was designed over 4 stages between 1956 and 1962. There was at this time renewed interest in public swimming venues, no doubt stimulated by Australia's success in the 1956 Melbourne Olympics.

The arrangement of pools and ancillary building constructed over the period bears a very strong resemblance to the original concept drawings prepared by the project architects; Figgis & Jefferson.

By that time, the firm had already designed Olympic swimming pool complexes at Mudgee, Bathurst, Gosford, Wellington, Holbrook, Bourke and Lithgow. Figgis & Jefferson went on to design outdoor swimming centres at, Epping, ACT, Goulburn, Temora, Merrylands, Cootamundra, Guildford, Roselands, Manly and the Warringal Aquatic Centre. At the same time, the firm designed an international sports centre and pools for the University of Dacca in Bangladesh.

During this period, spanning the 1950s through the 1970s, the swimming centres were mostly open air and laid out spaciously.

The Parramatta War Memorial Pool has provided service to the growing community of Parramatta for nearly 60 years. The pool complex is typical of those of its era in that it is located within a park and larger recreational area. In this case it's siting beside the Parramatta River and the Old Kings Oval is significant.

2. Character of Pool complex

The Parramatta War Memorial Pool complex has retained most of the character of its original design and is thus very representative of an era. The "era" by the way responded to the optimism of the post war years, the egalitarian nature of Australian society and the beginning of multi culturalism in Australia.

The Australian Baby Boomer generation and those that have followed have enjoyed the open air, the sunshine and spaciousness the pool complex has provided.

Within the confines one can find iconic elements of 1960s design:

- The fluted concrete cornice attached to the administration building is constructed in a "wave" pattern; symbolic in its time.
- The diving tower constructed as a reinforced concrete frame has an elegance reflecting the pioneering nature of concrete engineering in the 1960s.
- The main pool generously provides 8 racing lanes.
- The open areas surrounding the main pools are lightly terraced in an amphitheatre manner providing excellent supervision and distant vistas.
- The broad stripes of the concourse surrounding the main pools heralds the "Ivy League" style of the era.
- Unfortunately however, the children's pool has lost its sculpture but the overall character remains the same.



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From the pool environs one can appreciate its context in relation to the natural landscape of Parramatta Park, visible to the South West and the city of Parramatta filling the South Eastern view. The proximity of the Parramatta River is very evident on approach to the Pool.

3. Value to the Community

The outdoor swimming facility of Parramatta War Memorial Pool is treasured by the residents of Parramatta, represented in part by the North Parramatta Resident Action Group. Given its location on the immediate edge of the City, the Pool is easily accessible to residents North, East and West of Parramatta.

Equally, the Pool is accessible to the CBD workforce. It can be approached from the O'Connell Street Bridge and is within walking distance of much of the city.

The facility is available year round to swimmers and provides a venue for many of the schools within the region.

Though the complex is 60 years old it provides an open and safe environment. It has been well maintained and presents itself proudly as a community facility.

It is considered that the open air and spacious nature of this facility will become ever more valuable as the density of Parramatta increases and access to open space diminishes.

4. The integrated Concept

These notes refer to the "Preserving Parramatta War Memorial Pool Concept" plan prepared by Figgis & Jefferson Tepa.

This plan is intended to illustrate that the Parramatta War Memorial Pool does not need to be sacrificed for the Construction of a new stadium built on the Cumberland Oval.

With thoughtful planning there is sufficient space within the "River Bend" to accommodate all the facilities currently occupying the site and more.

By reference to the plan, the principle elements are these;

- The stadium footprint has been modelled on the current proposal in public arena. It has however been shifted and re-oriented slightly to provide adequate space between the stadium structure and the existing pool spectator seating.
- In order to minimise the stadium's footprint, the plan suggests car parking and vehicular access points located beneath the playing field and structure; similar to the Colosseum in Rome.
- The plan shows an aerial connection between the stadium and the Southern O'Connell street approach. The aerial connection would fly over the pool complex with little effect on the operation and amenity of the Parramatta War Memorial Pool.
- It is envisaged that the aerial link be anchored at O'Connell street with a "celebratory" building announcing the gateway to the park precinct and forming a worthy landmark adjacent to the O'Connell street bridge.
- The celebratory building mentioned above could well provide community recreation facilities and services, acting in concert with the Pool and Stadium.







- Above the "celebratory" building the plan suggests refreshment facilities, cafes and similar venues providing social meeting spaces and interaction.
- A further extension to the plan would be to reconstruct the present car parking area underground. By these means, the recreational and scenic quality of the River Bend can be restored.
- At the northern precinct of the site, the plan suggests a great deal of fore court area and transport interchange serving both the Stadium and the Parramatta War Memorial Pool.

In summary;

- There is sufficient space to accommodate a new stadium and the existing open air pool.
- There is space for additional facilities and community activities.
- There is merit in maintaining the open air pool complex for present and future generations.
- There is potential for an integrated urban design approach to the "River Bend" precinct of Parramatta Park and its connection with the Parramatta CBD.

Stephen Figgis A.I.A 01 December 2016

PRESERVATION OF PARRAMATTA WAR MEMORIAL SWIMMING CENTRE CONCEPT



NPRAG is able provide high resolution digital images or A1 size images of the drawings

Attachment F

From: Suzette Meade

Sent: Tuesday, August 2, 2016 12:10 PM To: Cc:

Michael Bednarek'

ubject: RE: Request for Extension on Western Sydney Stadium (Concept & Stage 1 Demolition) EIS Submission Period

Dear David,

I would like to point out that the SEARS Report dated 18 April 2016 on page six under CONSULTATION states " During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. "

No consultation with community groups was carried out by VENUES NSW during the preparation of the EIS. In fact they have selected 'targeted rugby league fans' and labelled it community consultation. Venues NSW (Luke Coleman – Pirtek Stadium Director) only contacted NPRAG last week identifying the association as a stakeholder – but pointing us to turn up to the family fun day at the stadium to look at artist impressions of the proposed development.

The submission of the EIS is premature, and we request that meaningful consultation with the community groups needs to start again and comply with the Sears Report dated 18th April 2106.

We will be advising Minister Stokes of our request today as well.

Kind Regards

Suzette Meade President - NPRAG

From:

Sent:

Michael Bednarek Subject: RE: Request for Extension on Western Sydney Stadium (Concept & Stage 1 Demolition) EIS Submission Period

Dear Ms Meade,

Thank you for your email. The Secretary – Carolyn McNally has requested that I respond to your email.

My team has spoken with Infrastructure NSW (INSW) who are taking the lead on the project. INSW has advised that a series of community forums and direct one on one consultations are planned as

part of the EIS exhibition. This includes direct consultation with the North Parramatta Residents Action Group by Executive Director level representatives from INSW and Venues NSW.

As you are aware, the EIS and State Significant Development DA is on exhibition until Friday 19 August. Please note that the SSD DA is a Concept Plan for the proposed envelope of the new stadium and also a Stage 1 DA for the demolition of the existing stadium and the pool area. Should the DA be approved then a further more detailed DA would be submitted next year with the actual design of the new stadium and would provide opportunities for further comment.

Given the proposed consultation by INSW, the Department at this stage does not support the need to extend the exhibition period. I would be happy to meet with yourself and any key members of the North Parramatta Residents Action Group to better understand your issues as part of the assessment process. Please contact my EA – Michael Bednarek on 9228 6189 should you wish to arrange this meeting.

Regards

David Gainsford

Executive Director Priority Projects Assessments – Planning Services Department of Planning & Environment 23-33 Bridge Street | GPO Box 39 SYDNEY NSW 2001

Please consider the environment before printing this email.



From: Suzette Meade Sent: Tuesday, 26 July 2016 11:00 AM To: Louise Higgins ; Peter McManus Subject: RE: Request for Extension on Western Sydney Stadium (Concept & Stage 1 Demolition) EIS Submission Period

Thank you for your response Louise.

Further to my email yesterday after reading the consultation report discovered flaws in the consultation process carried out by Venues NSW that do not comply with the SEARS report. The only consultation reported under community was with two rugby league fan forum events. No community events were advertised or held for the greater community.

We will be formally requesting the consultation with the community be carried as per the SEARS report.

Regards

Suzette Meade President – North Parramatta Residents Action Group (<u>www.nprag.org</u>) Committee Member – Parramatta Council Heritage Advisory Committee Executive Committee – Better Planning Network From: Sent: Tuesday, July 26, 2016 10:54 AM To: Suzette Meade ubject: RE: Request for Extension on Western Sydney Stadium (Concept & Stage 1 Demolition) EIS Submission Period

Dear Ms Meade

I refer to your email to Ms Carolyn McNally, Secretary, NSW Department of Planning and Environment concerning the Western Sydney Stadium.

The Secretary has asked me to acknowledge your email and to indicate a response will be provided to you shortly.

Louise Higgins Executive Assistant to Secretary NSW Department of Planning and Environment

From: Suzette Mead Sent: Monday, 25 July 2016 10:55 AM To: Carolyn Peter McManus Subject: FW: Request for Extension on Western Sydney Stadium (Concept & Stage 1 Demolition) EIS Submission Period

Dear Ms McNally and Mr McManus,

On 21st July 2016, the Department of Planning & Environment made reports for the Western Sydney Stadium (Concept & Stage 1 Demolition) available to the public (<u>http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7534</u>).

There are many concerns that this development will have potential impact on World Heritage Listing of the adjacent Old Government House and Vistas, Crown Land that falls under the Parramatta Park Trust Act 2001 and has had inadequate genuine consultation carried out with the community from the City of Parramatta.

Due to the in-depth investigation required with relevant committees of associations to ascertain these potential issues, I as a representative of the community wish to formally request an extension for the submission period to be changed to September 30th 2016.

Kind Regards

Suzette Meade President – North Parramatta Residents Action Group (<u>www.nprag.org</u>) Committee Member – Parramatta Council Heritage Advisory Committee Executive Committee – Better Planning Network

Attachment G

From: Suzette Meade
Sent: Tuesday, March 7, 2017 12:06 PM
To:
Cc:
Subject: URGENT / Parramatta Sports Precinct - Alternative Vision to Save Parramatta Pool

Dear Hon Andrew Constance,

The continuing groundswell of support we have in Parramatta has caused me, as President of a large Residents Group in the City of Parramatta, NPRAG to ask you take immediate and the appropriate action after reading our request.

For the past 18 months NPRAG with the community, have been championing for our affordable public pool (which only 7 years ago underwent a \$10 million rate-payer funded renovation) from unnecessary demolition.

Ever since the State Government announced the Stadia Strategy would include knocking down Parramatta's existing 22,000 seater Pirtek Stadium, and replacing it with a 30,000 seater at a cost of \$300 million, we have been concerned about the fate of the War Memorial Pools.

After the February 2016 State Government announcement to the public and Parramatta City Council that Parramatta's public War Memorial pool will be demolished, we implored the local member, Dr Geoff Lee, to make sure that Sydney's second largest city was not left without an Olympic standard pool within its CBD!

Although Dr Lee said he had tried to have the pool remain, we had not seen any evidence of this and so the residents of Parramatta took it upon themselves to find a better/alternative solution. The public raised money and hired the original pool's architectural firm, Figgis Jefferson and Tepa to come up with a satisfactory solution.

We have now illustrated that the existing pool and a new stadium can in fact continue to coexist with changes to the precinct design that will in fact make this an inclusive recreational area for the growing Parramatta.

The residents of Parramatta do not accept that it is too late. Venues NSW failed to consult with community groups with the Stage 1 DA which they were required to do so as per the DPE Sears regulations.

The pool still operates, and you Mr Constance have an opportunity to show that you are able to give the community what they want as well as deliver the stadium. A solution that benefits everyone. To leave the community without a pool for 2-5 years and spend a further \$50 million of tax payer and rate payer funds to build an aquatic centre on our diminishing Parramatta Park lands is not the right decision - especially with the forecasted high density population increase being imposed by the Greater Sydney Commission to Western Sydney.

We implore upon you to cancel the scheduled demolition of Parramatta War Memorial Pool on March 31st.

To then pause the stadium project for a minimum of 6 months to allow for genuine and transparent consultation allowing alternative planning of this Sports Precinct ensuring that the stadium and the pool to can continue to coexist. This is a once in a life time opportunity to create a landmark precinct of healthy, inclusive space for community to exercise, socialise and watch professional sport - make this one of your greatest legacies!

We have attached our alternative concepts for your consideration and would be very grateful for a meeting with your team and our architect Stephen Figgis.

Kind Regards

Suzette Meade President www.nprag.org www.facebook.com/parramattacommunity

Kind Regards

Attachment H

NPRAG letter to Minister for Planning Rob Stokes - 2 August 2016

North Parramatta Residents Action Group

2. August, 2016

The Hon. Rob Stokes Minister for Planning Parliament House, Macquarie Street SYDNEY NSW 2000

Dear Minister

REQUEST FOR URGENT MEETING: APPLICATION BY VENUES NSW FOR PROPOSED STADIUM CONCEPT PROPOSAL AND STAGE 1 DEMOLITION

The State Significant Development Application for the Western Sydney Stadium Concept Proposal and Stage 1 Demolition is now on exhibition until Friday 19 August, 2016.

We understand the proposal will necessitate the closure of Parramatta War Memorial Pool by the end of the year, and result in the transfer of Crown Land that is protected under the Parramatta Park Trust Act 2001 to facilitate the development of a 42 metre high stadium to accommodate 30,000 fans. Further, the application also includes a note stating that it includes future development of an additional 20,000sqm '...of future ancillary uses'. This in itself cannot be considered as part of the approval process as it does not state the intended purpose.

As a key stakeholder, the North Parramatta Resident Action Group (NPRAG) were shocked to see the Concept Plan go on exhibition on 21 July, despite a requirement in the SEARs that "**During the preparation of the EIS**, **you must consult** with the relevant local, State or Commonwealth Government authorities, service providers, **community groups** and affected landowners." We note there was no contact with our group nor were local groups in the area consulted.

In response we contacted the Department's Secretary, Carolyn McNally to seek an extension of time. Subsequently that evening Venues NSW's Luke Coleman (Pirtek Stadium Director) contacted the NPRAG President to inform us that a number of pop-up events would take pace to inform the public about the proposal, the first of which was on at 7am the following morning at Parramatta station. Since the initial correspondence, Mr Coleman has also offered to meet with us to discuss the project.

While we appreciate these communications, we were deeply concerned to learn that the only community consultation that occurred before the EIS was put on exhibition was with targeted supporters of the Balmain Tigers, Canterbury Bankstown Bulldogs and Parramatta Eels, while local communities were left in the dark. This hardly constitutes 'community consultation' by any standard and does not comply with the requirements of the DPE SEARs report.

Notwithstanding the fact that this does not meet the SEARs requirements, the approach taken by Venue NSW also defies logic given the government's commitment to properly engage with communities and also our concerns long expressed about the consultation process for the Cumberland Hospital Fleet Street precinct. Nor as we heard at the first day of the Hearings for the Parliamentary Inquiry into Crown Land, does the process reflect that in other jurisdictions where crown land parcels are transferred.

The purpose of writing to you today, is to seek an urgent meeting with you to discuss concerns, with view to the community engagement process starting again, and the Concept Plan then being readvertised, as to what should have occurred. The current EIS submitted by Venues NSW is premature. We look forward to your urgent response.

Yours sincerely,

Suzette Meade President, North Parramatta Residents Action Group