

**Submission
No 327**

INQUIRY INTO SYDNEY STADIUMS STRATEGY

Organisation: Saving Sydneys Trees

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Saving Sydneys Trees Incorporated

**Submission in response to the
Inquiry into Sydney Stadiums Strategy
2018**

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Terms of Reference

That the Public Works Committee inquire into and report on the Government's Sydney stadiums strategy, and in particular:

- 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.

Introduction to Saving Sydneys Trees Incorporated

Thank you for the opportunity to respond to the Inquiry. By way of introduction, Saving Sydneys Trees (SST) was established in 2016 in response to the felling of hundreds of Sydney's most Significant Trees to make way for Sydney's Light Rail (LR) project. This includes many of Sydney's most historic and much loved fig trees along Anzac Parade and Alison Road.

Today, we are a well-established group with a network of more than 12,000 supporters. Key objectives in our Constitution include the promotion of open and transparent governance and planning processes to ensure the protection of communities and fauna and minimise the tree canopy loss across the Greater Sydney region.

We work with groups across Sydney and are familiar with the experiences of many local communities. This includes key concerns around governance and process, with the loss of confidence in government apparent. Much of this is driven by concerns around what is perceived to be poor decision making where the process is viewed as politicised. This includes key concerns about the plans for Allianz Stadium (Sydney Football Stadium) and its potential impact on Moore Park.

Our investigations indicate the plans for Allianz Stadium are interlinked with those of Sydney's LR project, as are the plans for neighbouring Entertainment Quarter (EQ). In preparing the Submission we have focused on Sydney Football Stadium and concerns around governance and process and potential impact on Moore Park.

To this end, we believe the decision making processes for the approval of state significant developments and major infrastructure projects needs urgent review. We also make a number of key recommendations to better utilise stadia facilities while increasing parklands and make a number of practical suggestions about any plans for Sydney Football Stadium.

We welcome the opportunity to appear before the Hearing.

Sincerely,

Professor Helen Armstrong
for Saving Sydneys Trees Inc.

Response to the Inquiry

1. The Inquiry follows public concern about Sydney's Stadia Strategy; in particular the NSW government's announcement on the 29 March 2018¹ to fund the demolition and rebuild Sydney Football Stadium (SFS), known as Allianz Stadium, at a cost of \$729M and upgrade ANZ Stadium at Olympic Park at the cost of \$810M. In addition, we note works are underway for the new Western Sydney Stadium at a revised cost of \$360M. In total a budget of ~ \$1.9 Million.
2. The announcement follows a number of changes to the government's position with its most recent decision not to demolish the 20 year old ANZ Stadium; instead refurbish it. However, plans to demolish and redevelop the Sydney Cricket Ground Trust's SFS 'into a world class venue to ensure Sydney has a sporting and entertainment precinct of international standard'² continue.
3. The government's decision follows a public outcry, which has seen more than 205,000 people so far sign a petition³ which calls on the NSW government to stop wasting \$2 Billion rebuilding SFS and Olympic Stadium.
4. The decision to demolish and rebuild the SFS is particularly contentious, with the government's latest decision failing to quell public anger. Situated on public land bequeathed to the people of NSW for the purposes of providing outdoor recreational for the needs of Sydney residents, only a third of the bequest now remains as open public land.
5. Managed by the Sydney Cricket and Sports Ground Trust, under the provisions of the Sydney Cricket & Sports Ground Act, 1978, the Trust is charged with the responsibility to care, control and management of the Scheduled Lands dedicated for public recreation. This includes management of SFS and to its immediate south Sydney Cricket Ground. Adjacent to the precinct is Fox Studios and the Entertainment Quarter with Moore Park to the immediate west, and residential precincts adjacent to the west and east.
6. The Trust is subject to control and direction of the Minister for Sports and Recreation' the Hon. Stuart Ayres MP⁴. Board Members include Tony Shepherd (Chair), Rod McGeoch (Deputy), Alan Jones, Barry O'Farrell, Richard Colless, who are also members of the Development Committee⁵.

¹ <http://www.venuesnsw.com/media-release/anz-refurbishment-to-save-taxpayers-500-million>

² <https://www.scgt.nsw.gov.au/sydney-cricket-ground/>

³ <https://www.change.org/p/premier-berejiklian-stop-nsw-government-wasting-2b-rebuilding-sfs-olympic-stadiums>

⁴ <https://www.scgt.nsw.gov.au/media/2014/scg-trust-2016-17-annual-report-1.pdf>

⁵ <https://www.scgt.nsw.gov.au/media/2014/scg-trust-2016-17-annual-report-1.pdf>

7. Notably the Trusts Annual Reports for 16/17 and 15/16⁶ show nearly \$33 Million spent on capital works over the past two years including 'Allianz Stadium safety and compliance upgrade'. This follows a capital works spend of \$175 Million the previous two years after securing government funding for \$136 M for upgrades to the Bradman / Noble Stands along with \$38 Million government spend for the controversial Tibby Cotter Bridge. The Trust Annual Reports also show \$2.4 Million paid for consultancy services (over \$50,000) for the past two years. This includes \$270,000 for masterplan work in the most recent year.
8. The Annual Report states 'The Trust and the Centennial Park Trust have worked together over the past 12 months to ensure that the respective trusts' goals for the greater Moore Park precinct align' with plans the trusts are also working on a number of objectives including 'more park for Moore Park', making 'it as easy as possible for people who visit Centennial Park and Moore Park, the Entertainment Quarter, and the SCG and Allianz Stadium, to access and egress the precinct as easily as possible and working on a long-term transport plan that leverages the NSW Government investment in the CBD and South East Light Rail'. This follows previous commitments with government to bring Light Rail to the precinct and introduce a pedestrian bridge over Anzac Parade⁷.
9. Infrastructure NSW (INSW) has been appointed to manage the delivery for stages 1 and 2 of the SFS project, with the application for the Secretary's Environmental Assessment Requirements (SEARS) for the Concept Proposal and Demolition lodged with the Department of Planning and Environment (DPE) on the 4 April 2018. The application indicates the stadium will house up to 45,000 people. This compares with the current capacity of 45,500 following more recent capital works.
10. In response the Department issued its SEARS⁸ on the 3 May, 2018. This requires the proponent 'During the preparation of the EIS' to 'consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups, special interest groups and affected landowners (if required)' . Further that consultation with Council and agencies should commence as soon as practicable to agree to the scope of assessment. In addition, the 'EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided'.
11. News from INSW indicates the SFS project is being fast-tracked, with the EIS along with the State Significant Development Application (SSDA) for Stage 1 to be lodged in June. This has

⁶ <https://www.scgt.nsw.gov.au/about-us/policies-and-documents/annual-reports/>

⁷ <https://www.scgt.nsw.gov.au/media/2016/scg-trust-annual-report-2013-14-1.pdf>

⁸ https://majorprojects.accelo.com/public/c21fe61513db27c6fb0388a7eb51d584/SSD%209249_%20SEARs.pdf

prompted concerns about the adequacy of the consultation process to date, which are discussed later in this report.

12. Infrastructure NSW (INSW) is the government's 'independent infrastructure advisory agency' whose responsibilities include overseeing the assessment and recommendations for Restart NSW projects while managing the program delivery. Program funding is 'by the sale of the electricity network transactions, Commonwealth Government Asset Recycling Initiative payments, and investment earnings'⁹.
13. Funding for the Stadia Network Program, i.e. rebuild the new Western Sydney Stadium at Parramatta, upgrade ANZ Stadium at Olympic Park and demolish and rebuild Sydney Football Stadium is being made through the sale of the Land and Property Information Services with \$600 Million from Rebuilding NSW Plan¹⁰. It is assumed that any budget shortfall will be addressed in the upcoming budget.
14. Notably decisions around the delivery of the Stadia Strategy have 'seesawed' in recent years largely in response to public concerns. In part this is due to the plans for the SFS which would see the stadiums demolition after only 30 years, and public concerns in relation to the potential impact on Moore Park, with the former Premier, Mike Baird's deciding to contain the works to the Stadium's refurbishment¹¹.
15. Media reports suggest the Premier's support for the SFS project for more than a year, with correspondence from the Premier to Tony Shepherd, the Chair of the Sydney Cricket Ground & Sports Trust in April 2017, wherein the Premier in a hand written comment writes, "Let me know if it's taking too long, and I will move things along"¹².
16. Yet media reports suggest there is mixed feedback from the sporting codes themselves with both the heads of National Rugby League and Football Federation Australia indicating a preference to see ANZ Stadium redeveloped. Specifically David Gallop, the CEO for Football Federation Australia indicates a 'strong preference for the development of ANZ Stadium to be prioritised and completed first', while Todd Greenberg from National Rugby League suggests he'd like to see a smaller 35,000-seat rectangular stadium 'similar to the new \$360 million Western Sydney Stadium at Parramatta'¹³. In contrast the heads of rugby indicate a preference for a new and much larger stadium at Moore Park for the purpose of World Cup events.
17. Yet, attendance rates for both Stadiums show they are often underutilised, with crowd sizes averaging 35% usage for regular season events at the SFS stadium and 17% for ANZ Stadium.

⁹ <http://www.infrastructure.nsw.gov.au/restart-nsw/>

¹⁰ <https://www.budget.nsw.gov.au/sites/default/files/budget-2017-06/2.%20Restart%20NSW.pdf>

¹¹ <http://www.afr.com/business/sport/nsw-premier-gladys-berejiklian-reverses-mike-bairds-decision-on-allianz-stadium-upgrade-20171123-gzrjilz>

¹² <https://www.smh.com.au/politics/nsw/nsw-parliament-papers-stadium-policy-berejiklian-20180410-p4z8ps.html>

¹³ <https://www.smh.com.au/politics/nsw/nsw-parliament-papers-stadium-policy-berejiklian-20180410-p4z8ps.html>

In comparison headline events, such as Wallabies vs England at SFS and sell-out concerts such as Coldplay at SFS and Adele at ANZ Stadium show capacity utilisation. Our analysis (Appendix A) also highlights the lower utilisation rates across a number of facilities prompting observations that the broader strategy for the Sydney’s stadia facilities needs review, to ensure better utilisation while considering the options for headline events and potentially providing the opportunity to improve green space across Greater Sydney.

18. The decision to demolish and rebuild SFS will see a cost premium of more than 50%, compared to the new Western Sydney Stadium or refurbishment of the ANZ Stadium while at the same time reducing its current capacity. However the proposition to increase its capacity as indicated by the heads of Rugby Union would present major challenges for Sydney’s transport system and is viewed as a poor planning solution for the wider area.

	Western Sydney Demolish / New	ANZ Refurbish	Allianz (SFS) Demolish/New
Capacity (old)	20,000	83,500	45,500
Capacity (new)	30,000	76,000	40,000 - 45,000
~ Cost	\$10,285	\$10,685	\$16,200

19. Further, not only has the decision attracted criticism from the wider public but also from Venues NSW, the agency charged with the responsibility for managing publicly-owned sports and entertainment venues in NSW, with exception of assets being managed by the Trust. In correspondence to a colleague, the Chair of Venues NSW¹⁴ writes “the \$2.3 billion allocated by the NSW Government to rebuild two stadiums will haunt them until the next election” and asks “What’s the business case and will crowds fill it?”
20. Moreover the 2015 Brogden¹⁵ report makes the recommendation that a ‘single governing entity’ be established with jurisdiction over the Sydney Football Stadium, Sydney Cricket Ground, Stadium Australia and new Western Sydney Stadium, emphasising the necessity for ‘competitive neutrality’ and to ‘prioritise and amalgamate Sydney’s facilities while ‘maximizing the commercial viability’ and ‘coordinating sports and events’. The failure to implement the

¹⁴ <https://www.theaustralian.com.au/national-affairs/state-politics/nsw-government-to-be-haunted-by-stadiums-rebuild-plan/news-story/6a4a1e6763d2538d123be2e29531ac51>

¹⁵ <http://www.abc.net.au/cm/lb/7262900/data/brogden-report-data.pdf>

- recommendation is seen by many as the government's 'Achilles heel', with growing concerns about the interrelationship between the Trust, the government and sections of the media.
21. In response, Luke Foley, the Opposition Leader has promised if elected in the March 2019, Labor will overturn the decision saying, "We won't be knocking down and rebuilding either Moore Park or Olympic Park Stadium because there's much greater priorities for NSW"¹⁶.
 22. However the timing may follow the demolition of SFS, with media reports indicating the Premier is committed to seeing the stadium demolished prior to the election.
 23. Notably, tax payer funding of venues is also contentious in other jurisdictions including Victoria, where the Liberal Party has committed to shelving a \$300 Million plan to upgrade AFL's recently purchased Etihad Stadium, arguing the government has "no mandate to enter into any lucrative deal with the AFL at the expense of Victoria's community sporting clubs"¹⁷.
 24. Likewise the Final Business Case Summary released in March 2018¹⁸ prompts further questions given its BCR, which indicates associated infrastructure costs are not included. Yet the Stadium upgrades have long been flagged in INSW SIS strategy (2014) report which prompts questions around process, given the public are typically reliant on the application process to have their say, when in reality it appears the project has already been signed off through the political process.
 25. Moreover, despite INSW highlighting the challenges around 'the ability of cost-benefit analysis to capture the full range of social, economic and environmental impacts of projects' it seems government infrastructure projects are typically approved in principle, long before the project is tested through the EIS process and a detailed BCA, as was the case for the LR project, and is currently the case for the relocation of the Powerhouse Museum with the Minister failing to release key documents.
 26. Furthermore, changes to the planning system which removed the capacity for merit appeals have effectively silenced community and experts alike, who are often more familiar with the inherent risks and not confined from speaking out. This is well illustrated in the LR project, where the community and experts long foresaw the inherent capacity and design issues.
 27. Significantly, studies show that the 'interaction of sports stadiums and their communities have almost exclusively centered on economic impact' where the extent of the impact on the quality of life (positively or negatively) of citizens is often not considered, and where 'nearly every stadium development case worldwide, with the construction of a new state-of-the-art facility comes the promise of economic development (or redevelopment) and enhanced

¹⁶ <http://www.abc.net.au/news/2018-03-15/nsw-labor-would-not-choose-to-demolish-sydney-stadiums/9553164>

¹⁷ <https://www.news.com.au/sport/afl/liberals-want-300m-etihad-stadium-cash-for-grassroots-sport/news-story/913adf221cbdec667640384ea60cbcec>

¹⁸ <http://www.infrastructure.nsw.gov.au/expert-advice/business-case-summaries/>

liveability and vibrancy in the neighbourhoods surrounding the venue'. However the evidence indicates this is often not the case.¹⁹

28. Likewise INSW identifies 'the management and performance' of the asset²⁰ as a priority in its State Infrastructure Strategy 2018, INSW, making the recommendation that the DPE 'improve major project planning approval processes', with the initial reforms to include 'providing key environmental information' and emphasises the need for quality research and evidence. This includes 'preparing standardised risk-based performance requirements for each industry sector'.
29. Yet the failure to release its detailed Business Case for public scrutiny in time to respond to the pre-consultation process as required by the Department's SEARS, or this Inquiry highlights significant shortcomings around the process.
30. Moreover, the absence of public merit appeals for major infrastructure projects also remains a key shortcoming.
31. In looking at the stadia strategy, we have considered the decision against the backdrop of the existing facilities and future plans for Sydney.
32. Specifically, Sydney's rapid population growth with the DPE's analyses forecasting NSW to grow by 2.2 Million people to 9.9 Million by 2036²¹. 'These projections are not targets' but rather 'assumptions that take into account trends for births, deaths and migration', subject to change in response to factors such as 'migration levels, new technology and social attitudes to different living arrangements'.
33. Significantly, 80% of the growth is forecast to occur in Sydney with the population projected to increase from '4.6 Million to 6 Million in 20 years, to 8 Million in 2056 with most of the growth taking place in the west'²², with an annual growth rate of 1.7%. This is considerably faster when compared to major cities such as London, New York, Los Angeles, San Francisco and Berlin²³.
34. Notably, the projections do not cover the Greater Sydney region which population already reached 5 Million in 2017, and 7 Million taking Central Coast, Wollongong and Newcastle into account²⁴. Notably too, the projections are based on mid-range estimates²⁵

¹⁹ <https://kh.education.gsu.edu/csup/public-stadiums-urban-development/>

²⁰ <http://www.abc.net.au/cm/lb/7262900/data/brogden-report-data.pdf>

²¹ <http://www.planning.nsw.gov.au/Research-and-Demography/Demography/Population-projections>

²² <https://www.greater.sydney/three-cities>

²³ Property Council of Australia, 2018, The Business of Cities: Benchmarking Australian Cities, <https://bit.ly/2LUPE1C>

²⁴ Property Council of Australia, 2018, The Business of Cities: Cities Megatrends and Disruptors, <https://bit.ly/2xDNJeG>

²⁵ <http://www.planning.nsw.gov.au/Research-and-Demography/Demography/Population-projections>

- with the historical evidence showing Sydney's population has typically been underestimated, with growth much greater than forecast²⁶.
35. Consequently the face of Sydney is substantially changing, with greater growth in the western Sydney and along key transport corridors reflected in the Department of Planning and Environment (DPE) more detailed population analysis²⁷.
 36. Significantly too, analysis of Local Government Areas (LGA) shows the greatest growth in Camden at an annual growth rate of 5.3% a year over 20 years, Parramatta at 2.6%, The Hills 2.5%, Liverpool, Strathfield and Botany, all at 2%, Sydney, 1.9%, Burwood and Blacktown 1.8% and Wollondilly at 1.7%. In comparison growth in LGAs eastern part of the Sydney is smallest, i.e. Waverley at 0.2% and Woollahra -0.1%, with Randwick relatively modest at 0.8%²⁸.
 37. However these figures should be considered in context of existing and future densities- in particular open space and local facilities within the context of the location of very high-density precincts that are being introduced across Greater Sydney and the urbanisation of 'middle ring' suburbs which has seen more recently a public backlash. Key challenges include the loss of the traditional 'Aussie backyard' with communities far more reliant on sufficient green space and good quality facilities to ensure equity and liveability are inherent drivers. Likewise the loss of urban tree canopy cover has become an inherent challenge with the necessity to not only minimise the loss but increase Sydney's urban canopy cover to offset the impact from climate change.
 38. In response we see the need for premium facilities across the wider Sydney basin rather than the traditional approach whereby the East was the inherent driver of not only economic activity and had the benefit of social advantage. In doing so, this would enable the opportunity to consider and address inequity in green space and facilities²⁹, by using underutilised public land to introduce and backfill new regional green space, while prioritising new opportunities for new facilities and upgrades across the wider Sydney basin, thereby taking a more proactive role to 'reimagining' Sydney.
 39. In particular quality regional green space is needed in or near high density precincts, such as those planned for Canterbury-Bankstown and inner Sydney suburbs, where the addition of tens of thousands of residents in high density precincts has inherent risks. With some precincts to accommodate 500 to 1,000 residents per hectare in high-rise communities in the inner suburbs addressing the inequity in green space, is crucial.

²⁶ Dr Bob Meyer, 'Sydney 2016 – 2051, Parliament House, 17 February, 2016. Bob is the recipient of the Sidney Luker Memorial Award and presenter of its Memorial Lecture "Fifty Years of Sydney's Planning".

²⁷ <http://www.planning.nsw.gov.au/Research-and-Demography/Demography/Population-projections>

²⁸ <http://www.planning.nsw.gov.au/Research-and-Demography/Demography/Population-projections>

²⁹ https://gsc-public-1.s3.amazonaws.com/s3fs-public/Greater_Sydney_Open_Space_Audit.pdf

40. At the same time, this would facilitate premium sporting facilities in response to the projected growth of 1 Million people in Sydney's west³⁰ over the next 20 years with 'Western Sydney's population to swell to 4 Million by 2050, making it almost the size of Melbourne today'³¹
41. These challenges are in part similarly highlighted in INSW's SIS, where six cross-sectoral Strategic Directions are identified to ensure that 'population growth does not erode the amenity and character of our suburbs, towns and communities' with the need to 'plan, prioritise and deliver an infrastructure program that represents the best possible investment and use of public funds' and 'optimise the management, performance and use of the State's assets', to achieve 'more with less' from the State's 'infrastructure program and asset base'. In response the strategy identifies the need for continuous improvement in the 'integration of land and infrastructure planning'.
42. Moreover, a key Geographic Direction identified in the SIS is the need for 'investment to shift westwards initially to the Central River City'.³²
43. Consequently, when reviewing the existing facilities across the Sydney basin, we see three priorities - better utilisation of existing facilities, the need for Tier 1 facilities in Western Sydney and upgrades to existing facilities across Greater Sydney.
44. This would also see the opportunity to introduce new regional green space near high rise precincts such as Canterbury-Bankstown and Sydney's inner city suburbs.
45. In response, we see the opportunity to return the SFS footprint to the people of Sydney as parkland, thereby responding to the demand for regional green space in Sydney's inner suburbs which has seen Centennial Parklands visitor numbers escalate from 20 Million in 2013 to 31 Million in 2016. This compares to annual visitor numbers to Allianz Stadium ~ 1.5 Million for 2016/2017³³.
46. In returning the footprint, it would serve to address the inherent challenges of increase quality green space in close proximity to Sydney's CBD along with Sydney's inner city suburbs. As a comparison, Western Sydney Parklands provides 5,280 ha of recreational lands and green space to the people of western Sydney. This compares to Centennial Parklands' 360 ha which increasingly faces the challenge of increased commercial activity and plans afoot for EQ. Likewise we see the opportunity to create a premium regional park on the former Canterbury Racecourse to provide greater social and environmental benefit

³⁰ https://www.treasury.nsw.gov.au/sites/default/files/2017-09/NSW%20Budget%202017-18%20-%20Western%20Sydney%20Overview_0.pdf

³¹ <https://www.dailytelegraph.com.au/news/nsw/western-sydney-population-to-hit-four-million-with-blacktown-doubling-its-population/news-story/b0781f5ca58d86eb5c8ad07a6cca4c4b>

³² https://insw-sis.visualise.today/documents/INSW_2018SIS_BuildingMomentum.pdf

³³ <https://www.scgt.nsw.gov.au/media/2014/scg-trust-2016-17-annual-report-1.pdf>

over the longer term thereby realising a longer term economic benefit. In doing so, it would also respond to Sydney's transport imperatives, rather than inducing cross-city traffic. Similarly, the historic precinct of Cumberland Hospital at North Parramatta provides the opportunity to increase Parramatta Park rather than see its high-rise redevelopment which would jeopardise its World Heritage listing, and the potential to see the precinct become an international tourist destination.

47. Given the imperative, and that the investment in public lands and stadia has accumulated over a long period, it is timely to reassess sporting facilities across Sydney with view to delivering first class stadia and sporting facilities while identifying opportunities for the conversion of the footprints where public land is better served as regional forests and parks.
48. Significantly, the Greater Sydney Commission plans to 're-imagine' Sydney as a 'metropolis of three great cities'³⁴ adds to the argument that facilities need to be geographically prioritised to Sydney's centre and west.
49. INSW's strategy also highlights the need to 'improve project identification, options development and evaluation' with projects 'subject to thorough investigation and evaluation before being funded or announced with the report highlighting that 'premature project announcements can put at risk service delivery outcomes and can lead to project delays and higher costs to government'. These challenges are highlighted by Sydney's LR project, with the timeline showing the project prematurely awarded before the inherent risks and associated costs could be properly scrutinised. While the subject of a separate Parliamentary Inquiry, the LR project timeline provides useful observations in terms of what can go wrong, and the impact on communities and the public purse with media reports indicating potential cost may be well more than \$1 Billion³⁵. Critically, the project's route and tram's redesign fundamentally changed the outcomes with wide reaching implications. Yet despite this, the contract was awarded on the same day that the public exhibition period closed³⁶, namely the 17 December, 2014³⁷, thereby preceding the Department's assessment of the project.
50. Similarly the planning process for Sydney Football Stadium now appears to be fast-tracked, with INSW indicating the EIS will be exhibited shortly, a relatively short time period following the announcement, and despite the inherent obligations under the Secretary's Environmental Assessment Requirements (SEARs).
51. Specifically the SEARS sets out pre-consultation as part of the preparation of the EIS. However when compared with industry recommendations such as the IAP2 spectrum, which takes into

³⁴ <https://www.greater.sydney/three-cities>

³⁵ <https://www.theaustralian.com.au/national-affairs/state-politics/new-12bn-blowout-for-nsw-lightrail-project/news-story/50bbbf85bfc0a042a6ae7fbb4876f140>

³⁶ https://www.treasury.nsw.gov.au/sites/default/files/2017-02/Sydney_Light_Rail_PPP.pdf

³⁷ Stock Exchange Announcement, 17 December, 2013. Incorrectly shown in some government docs as 18 Dec, 2014.

account more complex projects, the consultation process to date has been relatively poor. Similarly, the consultation for Western Sydney Stadium prompted concern when the local community was consulted after the EIS was released; not before. Moreover, while streamlining the engagement process is often viewed as an expedient way of managing public feedback, in doing so, it removes both the necessary checks and balances needed to serve the public interest, and hinders more innovative and collaborative outcomes from being achieved.

52. In the case of the SEARs for SFS, the EIS must include architectural drawings, shadow diagrams, view analysis and photomontages, a 3D digital model, arborist report, flora and fauna assessment, ESD strategy for future development, heritage impact statement, acoustic impact assessment, traffic and transport accessibility impact assessment report, public domain strategy, biodiversity development assessment report, construction plans and a report on the pre-submission community consultation as well as a number of other assessments. However for the community to provide informed comment, much of this information should have been provided, particularly as the timeline indicates that the plans would be well advanced. Yet little information was made available, rather the plans only indicated where the stadium's footprint will go, i.e. oved west and north in part and also require the demolition of other assets. Critically no information was made available about the adjoining precincts, despite media reports suggesting negotiations for the Entertainment Quarter (EQ) are advanced.
53. Further it appears much of the existing vegetation will be removed from the site. This includes the perimeter tree planting. This prompts key concerns given the impact that has already occurred on the significant trees in the 'Eastern City' over the past two years, as a consequence of a number of state infrastructure projects that are underway. In particular, we are most concerned that no further loss of trees (existing canopies) will be incurred.
54. Further, given the alarming and continuing damage that the construction sheds and other infrastructure has already had on Moore Park and neighbouring suburbs as a result of the construction of the LR project, there is considerable public concern about further damage to the Commons, Moore Park and Centennial Parklands, as a consequence of SFS plans. In response, the location for construction sites and works, and temporary changes to existing facilities needs to be carefully managed, with protective fencing covered with shade cloth put around existing vegetation, and in particular, along the full length of the western side of Driver Avenue in order to protect Moore Park East and Kippax Lake. In addition, a sizeable bond should be introduced, as a result of any unforeseen damage to public land, with the concept of tree bonds introduced, which are nominally costed at the value of the trees and vegetation that is removed and its replacement. A provision for the cost to community amenity, environmental services, health and wellbeing with an accepted method of valuations

should be agreed. Examples of models for tree valuation can be found within Australia and overseas.

55. Further, while the SCG Trust lands are zoned for Special Use Recreational, the EQ and former Fox Studios are subject to SEPP 47 (Moore Park Showground). A consortium holds the lease after Gerry Harvey, John Singleton and Mark Carnegie purchased the lease for \$80 Million in June 2014. Since then there has been considerable speculation about the precinct after touting their plans to redevelop the precinct³⁸. Today its members include Catherine Thompson, Robert Whyte, John Singleton, Darren Holland, Greg Paramor, Penelope Mapp and Gerry Harvey, whose wife, Katie Page, is a Trustee on the Sydney Cricket Ground Trust. With Gerry Harvey more recently quoted in the media, that the consortium has been 'pushing behind the scenes for an extension of its lease - due to expire in 2036, with a 10-year option to extend' – in return for what Mr Harvey says will be a \$500 million investment³⁹, there is strong interest in understanding what's being planned for the precinct. This is particularly relevant given the plans are likely to necessitate changes to the planning controls, and as a consequence could impact the Trust's lands, as indicated in the Trust's Annual Report for 2016/2017. Notably too is news that consent approval was granted on the 15 May this year to extend the current approval for the (2011) concept plan for an additional two years to November, 2020. This is prompting concerns given it enables the demolition of key building and introduces six new buildings on the northern part of the precinct.
56. Improvements are needed to the community engagement process to ensure there is confidence in the process, and the public is able to have proper input to any project and wider precinct changes. This is particularly relevant given the level of public interest. The process should also ensure it properly informs and seeks feedback, rather than rely on the public to know what questions to ask as highlighted at recent community information sessions, when the storyboards failed to provide a broader understanding. At the same time, concerns have been raised about the methodology used in the online surveys about the visitor experience and transport. Critically, concerns remain that the plans will impact Moore Park, particularly given the release of the Trust's 2012 masterplan and later again the Trust's 2015 plans which sought to expand into Moore Park⁴⁰. Further, communications should be consistent, with communications such as those made to SGT's members in March 2018 also released to the public so that they are fully informed.

³⁸ <https://www.smh.com.au/business/companies/john-singleton-gerry-harvey-mark-carnegie-buy-entertainment-quarter-for-80m-20140604-39j0k.html>

³⁹ <https://www.smh.com.au/sydney-news/investors-behind-500m-entertainment-quarter-redevelopment-push-for-lease-extension-20180326-p4z6ac.html>

⁴⁰ <https://www.smh.com.au/national/nsw/the-sydney-stadium-wars-how-did-we-get-here-20171208-h014te.html>

57. There are also concerns that the Centennial Park & Moore Park Trust Regulation 2014 which effectively enables the Trust to designate part of the public lands for the use of other activities could see the introduction of an underground car park on Moore Park West or neighbouring parklands. This would have a major impact on traffic management and local amenity as well as the potential to see the loss of more significant trees. In addition, concerns are held that the Crown Land reforms will have consequences for the parklands which are as yet not understood.
58. As a consequence it is imperative that any spill-over onto Moore Park is minimised with no loss to any significant heritage items. This includes the significant trees along Driver Avenue and historic figs around Kippax Lake and elsewhere on Moore Park East.
59. Moreover, there is wide scale concern that more contentious aspects of any project could be introduced through a staged process or later modifications, after first securing the approval for the stage 1 works, as is the case for the demotion and concept plan for SFS. Addressing this through a robust planning system is essential, particularly as the introduction of more headline events at the SFS would have a significant impact on the stadium's design and with it facilities and amenity, as would construction works and staging.

Annexure A follows.

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Annexure A: Stadia Analysis (2017)	GSC District	Stadium Capacity	Code	# Events	Crowd Size (Average)	Capacity Usage
Allianz (SFS), Moore Park	East	45,500	Football: Season	12	16,073	35%
			Football: Finals	2	31,742	70%
			Football: FFA Cup	1	13,452	30%
			Football: World Cup Qualifiers	1	27,328	60%
			Football: College	1	33,181	73%
			NRL: Season	11	13,971	31%
			NRL: QF, F & GF	4	20,411	45%
			NRL: Internationals *	2	27,241	60%
			Rugby: Sydney 7 *	3	40,491	89%
			Rugby: Super *	7	21,500	47%
			Wallabies vs Scotland *	1	44,063	97%
ANZ, Olympic Park	Central	83,500	Football: A-League	5	23,608	28%
			Football: Friendlies	3	78,848	94%
			World Cup Qualifiers	2	59,598	71%
			NRL: Charity Shield	11	12,516	15%
			NRL: Season	35	14,380	17%
			NRL: Final/Grand Final	2	60,505	72%
			NRL: State of Origin	1	82,259	99%
			NRL: Test Match	1	54,846	66%

Annexure A: Stadia Analysis (2017)	GSC District	Stadium Capacity	Code	# Events	Crowd Size (Average)	Capacity Usage
Belmore	South	19,000	NRL: Season	2	10,908	57%
Blacktown International Sport Park	Central	10,000	Football: AFWL/JLT	3	2,898	29%
Campbelltown Stadium	West	20,000	NRL: Season **	4	11,434	57%
Edensor Park Oval	West	12,000	Football: FFA Cup	3	1,982	17%
Jubilee Oval, Kogarah	South	20,500	NRL: Season	5	10,773	53%
Leichhardt Oval	East	20,000	NRL: Season	4	12,123	61%
			FFA Cup	2	3,509	18%
Lily Homes Stadium, Seven Hills	Central	5,000	FFA Cup	4	1,099	22%
Lottoland, Brookvale	North	23,000	Rugby: Super Trial	1	5,000	22%
			NRL: Season	10	11,154	48%
Panthers Stadium, Penrith	West	22,500	NRL: Trial	1	Not known	-
			NRL: Season	11	13,302	59%
			NRL: International	1	15,089	67%
Southern Cross Group Stadium, Cronulla	South	22,000	NRL: Season	12	12,593	57%
Spotless Stadium, Olympic Park	Central	24,000	Football: A-League	6	10,081	42%
			Football: AFL	9	13,612	57%
			Football: AFL Final	1	14,865	62%
			Cricket: BBL	3	20,769	87%

Annexure A: Stadia Analysis (2017)	GSC District	Stadium Capacity	Code	# Events	Crowd Size (Average)	Capacity Usage
Sydney Cricket Ground, Moore Park	East	48,000	NRL: Season	1	12,312	26%
			Football: AFL Season	11	32,489	68%
			Football: Final	1	46,323	97%
			Cricket: Third Test	5	22,406	47%
			Cricket: BBL	4	29,510	61%
			Cricket: ODI	1	31,979	67%
			Sheffield Shield	2	3,149	7%
WIN Stadium, Wollongong ***	South	23,000	NRL: Season	4	14,792	64%

Notes:

1. Where * is indicated courtesy of SCGT 2016/17 Annual Report. Other date courtesy Austadium.
2. ** Campbelltown: crowd size only known for one match.
3. *** WIN Stadium is included given ths stadium shares games for St George/Illawong.

