



GREENWICH COMMUNITY ASSOCIATION INC

BOB CAMPBELL OVAL MASTER PLAN



1 November 2020

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Executive Summary

Bob Campbell Oval is a unique grassed reserve in a bushland setting that has been enjoyed by the community for over 80 years.

It is the only significant expanse of grassed open space in Greenwich.

It provides space for active and passive recreation and for organised team sport.

It has been shared collaboratively as a flexible space.

Council has received a grant from the NSW Department of Planning, Industry and Environment under the Precinct Support Scheme.

The grant is for \$3,620,323.

This represents the largest grant ever awarded to Lane Cove Council.

For this reason, Council has a responsibility to ensure that grant funds are allocated to a project or projects that offer optimal benefit to all stakeholders in the community.

Council has a responsibility to ensure that the unique grassed open space at Bob Campbell Oval is accessible to all.

Council has a responsibility to ensure that it will expend the grant funds on works that do not pose a risk to the unique environment of Bob Campbell Oval.

Council has a responsibility to ensure that the health and safety of the community is not at risk by works it undertakes.

This submission explores the above issues and, accordingly, requests Council to

- reject the Bob Campbell Oval Master Plan on the grounds that the plan includes a synthetic sports ground
- request the Minister for Planning and Public Spaces to retain the allocation to Lane Cove Council of grant funds under the Precinct Support Scheme to be applied to an eligible project to be identified through a full review of existing and potential open space and sporting fields in the Lane Cove LGA
- ensure that all relevant stakeholders, including community members, are included in this review
- include in this review detailed technical advice and costings as to the installation and maintenance of natural turf on Bob Campbell Oval.

GREENWICH COMMUNITY ASSOCIATION INC (GCA)

SUBMISSION TO LANE COVE COUNCIL

BOB CAMPBELL OVAL MASTER PLAN

Preliminary Comments

1. Status of the Greenwich Community Association Inc (GCA)

The GCA is an incorporated association that has been the principal forum for Greenwich residents to discuss matters relevant to them for over 75 years.

One of the objects of the GCA is *“to do all things possible to further the interests of Greenwich and the Local Government Area of Lane Cove and to maintain and enhance the amenity of all residents and owners of property in Greenwich”*.

The GCA has a current financial membership of over 250, the highest rate of membership since 2016. It distributes printed bi-monthly newsletters to 2,000 homes and has an email distribution list of 900.

The GCA holds six general meetings a year and it has continued to do so during the COVID restrictions, with the exception of its April meeting.

Over 1,500 Lane Cove (mainly Greenwich) residents have signed the GCA petition calling for the grassed surface to be retained at Bob Campbell Oval and over 80 submissions to Council have been copied to the GCA reflecting the same concerns.

For the above reasons, the GCA is confident that this submission reflects the views of the Greenwich community and legal advice to the GCA.

2. Grant under Precinct Support Scheme - Process to date

The funds available under the Precinct Support Scheme are significant, on average \$5 million per LGA.

Funds of this scale have the potential to deliver significant gains to the whole community.

Given that Council stood to receive a grant under the Precinct Support Scheme well in excess of any grant previously received by Council, it would have been reasonable to assume that Council officers would nominate a project that had the full support of our elected Councillors and the community.

The complete opposite occurred.

After a GIPA process initiated by the GCA, the community is now aware that its own Council officers submitted in March 2020 an application to the Department of Planning (DPIE) for a grant under the Precinct Support Scheme for a project ***Bob Campbell Oval upgrade to***

synthetic field and other recreational facilities to supplement open space in the St Leonards Crows Nest precinct.

Council officers were well aware that the Greenwich community has, since 2015, contended that the open space planned for the St Leonards Crows Nest Precinct is inadequate and that this should be provided within the boundaries of that precinct.

Under the project nomination Greenwich, the suburb that is bearing the brunt of the massive residential development in St Leonards, is to lose its only grass whilst other parts of the LGA (Kingsford Smith Oval, Pottery Green, Tantallon Oval and Blackman Park) have large expanses of grassed open space.

This proposal to take away from the Greenwich community its only significant parcel of natural green space to address the needs of Council's own open space deficient St Leonards South area demonstrates total disregard for the views of the Greenwich community.

3. Request for Council to:-

- **reject the Bob Campbell Oval Master Plan**
- **to seek Minister's consent to a grant nomination variation**
- **to undertake, with the community, a full review of existing and potential open space and sporting fields in the Lane Cove LGA.**

For reasons outlined in our objection below, the GCA requests Council to reject the Bob Campbell Oval Master Plan.

We request Council to thereupon advise the Minister for Planning and Public Spaces that it wishes to vary its project nomination under the Precinct Support Scheme and to seek approval to apply the funds awarded to an alternative project that is developed through engagement with the community.

At the suggestion of the Mayor on 23 October 2020, the GCA has already written to the Minister seeking confirmation that the grant funds may be applied to an alternative eligible project.

The GCA requests Council to initiate, with appropriate community engagement, a full review of open space and sporting fields within and adjacent to the Lane Cove LGA to ensure that delivery of active and passive recreational facilities and sporting fields is shared equitably across the LGA and with appropriate regard for the rights of all community members to have access to natural green spaces.

After undertaking this review, Council will be in a position to identify the most appropriate project to support a funding application under the Precinct Support Scheme.

GCA Objection to the Bob Campbell Oval Master Plan

The Greenwich Community Association Inc (GCA) objects to the Bob Campbell Oval Master Plan on the following grounds:-

1. Bob Campbell Oval defined

For the purposes of this submission, the GCA will use the name Bob Campbell Oval to refer to the entire area depicted on the draft master plan on Council's website. This includes the synthetic field and environs.



2. Elements of the Bob Campbell Oval Master Plan and relationship between them.

Council's characterisation of the playing surface at Bob Campbell Oval as a sports field is neither accurate nor consistent with the purpose of the Reserve Trust pursuant to which it manages the entire Bob Campbell Oval site.

The entire Bob Campbell Oval site has been used for generations as a public reserve. The playing surface on the site has been shared by community members for active and passive recreation and for use by organised sporting teams on a flexible basis.

Community members have always recognised that sporting teams will use the playing field for organised sport and worked around this in a collaborative manner.

Through this master plan, Council will allow the needs of organised sport to dictate the use of the entire site.

The proposal to convert the playing field to a synthetic surface has limited the scope of the community to use the entire site for recreational purposes and will create an "us and them" divide.

In an effort to include a range of community facilities on what is left of the site, Council has created a number of elements that do not link with one another and which totally alter the flexible use of this reserve that the community has enjoyed for generations.

Given that the synthetic sports field effectively dominates the plans for Bob Campbell Oval, the GCA will focus on this element for much of its submission.

3. No supporting legislative requirement or endorsed Council plan

There is no NSW legislation, Council planning document or published agreement that mandates or endorses the installation of a synthetic playing surface on Bob Campbell Oval to meet current or future demand.

1.1 There is no NSW legislation or planning policy requiring the delivery of a sporting field adjacent to a precinct that has been or will be re-zoned.

To the knowledge of the GCA, there is no NSW government legislation or planning policy that mandates the provision by an LGA of a sporting field outside a precinct that has undergone or will undergo re-zoning.

1.2 Lane Cove Council has NO APPROVED PLAN in place that endorses installation of a synthetic surface on Bob Campbell Oval

Council's Project Nomination form for the Precinct Support Scheme grant includes the statement:-

"Lane Cove Council has endorsed this project".

The GCA has been unable to locate any published approved plans to this effect.

2008 Recreation Action Plan

The Project Nomination form submitted by Council to the DPIE includes the following statement:-

"Lane Cove Council has endorsed this project. It has been identified as a future project in the Lane Cove Recreation Action Plan 2008".

This statement does not accord with the version of the 2008 Recreation Plan on Council's website.

"Investigate the feasibility of an all-weather synthetic field, possible locations are either Blackman Park or Bob Campbell Oval". (p 37)

A synthetic surface sporting field has now been installed at Blackman Park, so presumably the recommendations of the 2008 Recreation Action Plan have been addressed.

2016 – 2026 Open Space Plan

p 40 includes the general statement to *"Identify if any further playing field sites are suitable upgrade for synthetic surface sports fields and if feasible develop a business case to support funding requirements"* (Medium priority)

There is no specific mention in this plan of a proposal to install a synthetic surface on Bob Campbell Oval.

Community Land Plan of Management 2000

This plan is not applicable to Bob Campbell Oval as the land is Crown Land not vested in Council.

Draft Community Land Plan of Management June 2019

This plan remains a Council-approved draft only.

It has not been approved by the NSW Department of Planning Industry and Environment.

1.3 NSROC does NOT identify Bob Campbell Oval as a ground for potential increase in sporting capacity.

The FAQs that support the exhibition of the Bob Campbell Oval Master Plan include the following statement:-

*“The **2014 NSROC Regional Sportsground Strategy** which covered the LGAs of Hornsby, Hunter’s Hill, Ku-ring-gai, Lane Cove, North Sydney, Ryde and Willoughby, identified that demand for sports fields would far outweigh supply in coming years even with all exiting fields converting to synthetic to allow higher usage. This report identified Bob Campbell Oval as a potential synthetic field.”*

Council’s statement fails to address the fact that there has been a subsequent 2017 Regional Sportsground Strategy Review (presumably this supersedes the 2014 version) in which Bob Campbell Oval is not identified as a potential synthetic field – **it is not listed at all as a potential site for increased sports field capacity.**

4. Inconsistency with relevant Council plans for open space and recreation.

The installation of the synthetic surface on the sporting field at Bob Campbell Oval and the consequent re-configuration of all facilities will lead to a structured regimented use of the space at Bob Campbell Oval that is at odds with the principles and findings of Council's 2008 Recreation Action Plan and Council 2016 – 2026 Open Space Plan.

2008 Recreation Action Plan p 31

5.3 PRINCIPLES FOR FUTURE PROVISION

The principles for future provision of recreational opportunities in Lane Cove underpin the vision outlined above.

The recommendations in **Section 5.2** are made consistent with these principles, to:

- *recognise the social, health and wellbeing benefits of recreation.*
- *provide and/or facilitate a diverse range of recreation settings, facilities and activities, ranging from natural to developed settings and facilities.*
- ***provide quality, sustainable and flexible facilities and settings that can support high levels of use.***
- *provide a hierarchy of settings and facilities on a regional, district and local basis.*
- ***build on the strengths of recreation in Lane Cove, particularly natural settings and access to water.***
- *embellish, refurbish and / or augment existing facilities if appropriate rather than necessarily constructing new ones.*
- *make the available recreation spaces and facilities attractive to access, use and enjoy.*
- ***facilitate multi-purpose and shared use of recreation spaces and facilities.***
- *encourage access to and enjoyment of Sydney Harbour and the Lane Cove River.*
- *ensure equity of provision in terms of geography and population and employment distribution.*
- *cater for various age groups, genders, skill levels, cultural background and physical ability of recreational participants.*
- *collaboratively partner with other organisations (community, public, private) to provide recreation opportunities.*

2016 – 2026 Open Space Plan

p 18

In order of preference the top ten most valued activities people enjoyed in Lane Cove's open spaces were:

- Walking (other than bushwalking)
- Bushwalking/enjoying bush land
- *Relaxing/contemplating*
- Dog Walking
- Using play areas
- Playing informal sports game
- Family outings
- **Playing formal sports games**
- Meeting friends
- Running/jogging

p 19

The highest average level of satisfaction was in relation to 'Bush land reserves/walks' (3.97 out of 5) and 'Parks' (3.94 out of 5).

p 37

Provision of facilities that **balance the increasing needs of local established sports clubs with wider community needs; including the need to cater for more general use of open space**, more female activities; and emerging user groups such as personal trainers and professional/ unprofessional dog walkers.

5. Inconsistency with purpose of Reserve Trust

Council does not have the statutory power to install a synthetic surface on Bob Campbell Oval without the consent of the Minister for Water Property and Housing to a change of the purpose of the Reserve Trust pursuant to which Council manages the land.

The Council's FAQs include the following statement:-

Bob Campbell Oval is Crown Land but vested in Council to manage and maintain. Council therefore has permission to undertake works on Bob Campbell Oval.

The highlighted statement is misleading.

Under what legislation or instrument does Council have permission?

Council may, in specified circumstances, undertake some work but not the work contemplated in the Bob Campbell Master Plan.

A note to Council's Financial Statements for year ending 30 June 2020 is clear in this respect:-

Lane Cove Council

Financial Statements 2020

Notes to the Financial Statements

for the year ended 30 June 2020

Note 11. Infrastructure, property, plant and equipment (continued)

Crown reserves

Crown reserves under Council's care and control are recognised as assets of the Council. While ownership of the reserves remains with the Crown, Council retains operational control of the reserves and is responsible for their maintenance and use in accordance with the specific purposes to which the reserves are dedicated.

Improvements on Crown reserves are also recorded as assets, while maintenance costs incurred by Council and revenues relating to the reserves are recognised within Council's Income Statement.

Bob Campbell Oval is Crown Land comprising Lot 1 in DP 909055 and Lots 7322-7323 in DP 1157567.

It is to be managed by Council as Trustee under a Reserve Trust gazetted in 1988.

The Reserve Trust for Bob Campbell Oval is dedicated to Public Recreation.

The installation of a synthetic surface that address the needs (and not all the needs) of one sporting code and, in the process, dictates the use of the entire Bob Campbell Oval site is not consistent with the concept of Public Recreation.

It is the antithesis of Public Recreation.

Given that Council's draft Community Land Plan of Management June 2019 has not been approved, In the absence of Minister's consent to a change of purpose of the Reserve Trust grant, the installation of the synthetic surface should not proceed.

6. Development consent is required for works.

The installation of a synthetic playing field and the works consequent upon this (the raised drainage works, the kerb and the picket fence) are not covered by Section 65(2)(d) or Section 65(3) of the State Environmental Planning Policy (infrastructure) 2007 (SEPP)

Section 65(2)(d)

Section 65(2)(d) provides that development on Crown managed land can be carried out without consent on by or on behalf of a Crown land manager if the development is for the purposes of implementing a plan of management adopted for the land under the Crown Lands Management Act 2016 in relation to the land or in accordance with the [Local Government Act 1993](#) in relation to Crown managed land managed by a council.

There is no current plan of management that applies to the land:

- Council's Community Land Plan of Management 2000 does not apply to Bob Campbell Oval.
- Council's Draft Community Land Plan of Management June 2019 has not been approved.

In any case, there is not, within the terms of Council's 2019 draft a specific plan of management for Bob Campbell Oval, and the works could not be said to be for the purpose of implementing that (draft) plan.

Accordingly, the development cannot be carried out without consent in reliance on this clause in the SEPP.

Section 65(3)

Section 65(3) permits, without consent, a range of works to be carried out by or behalf of a Council on a public reserve under the control of or vested in the Council.

Bob Campbell Oval is managed by Council as Trustee. In any case, Council is the Crown land manager, a term explicitly used elsewhere in clause 65.

The land is not under the control or vested in Council.

For this reason, Section 65(3) does not apply.

7. Exempt development status inconclusive

The Bob Campbell Oval works are not likely to be exempt development under Section 66 of the State Environmental Planning Policy (infrastructure) 2007 (SEPP)

SEPP Infrastructure specifies preconditions generally and specifically for identified works, which must be met for the works to be considered exempt development. The proposed works do not meet those preconditions in significant respects as follows:

Visual impact of development

Section 66(1)(vi)

The raised playing surface of up to 600mm, in addition to the 800mm picket fence, and additional car parking area will have a significant visual impact on the surrounding land uses.

Increase in storm water run-off

Section 66(3)(c)

The Preliminary Terrestrial & Aquatic Fauna study by applied ecology Pty Ltd contains no assessment of the impact of the synthetic playing field, increased hard stand car parking and playground on storm water run-off from Bob Campbell Oval.

In the absence of data to demonstrate that there will be no such increase, the proposed works may not be exempt development. No stormwater analysis or report has been provided for public consultation and we query whether one has in fact been prepared.

The heat impact on native vegetation is undefined

Section 66(3)(b)

A car park is not listed as an exempt purpose

Section 66(1)(a)

Accordingly, in the absence of the requisite information indicating that the preconditions are met, the development cannot be considered to be exempt development.

8. Public health and safety risks

There is increasing awareness of potential public health and safety risks of synthetic playing surfaces.

Council has a legal obligation to consider the long term and cumulative effects of its actions on future generations and should not proceed to install a synthetic sportsground when there is no imperative to do so.

It is disappointing to see that Council is so focussed on minimising injuries to soccer players who make a conscious decision to play a contact sport whilst seemingly paying little regard to the well documented material about the health and safety impacts of synthetic playing surfaces on the whole community.

The only technical material available on Council's website that addresses health and safety concerns about synthetic sportsgrounds is the Smart Connection Consultancy FAQ infosheet.

Smart Connection Consultancy's business is the delivery of synthetic sports grounds. It was the lead consultant in the delivery of Council's synthetic fields at Blackman Park. It is not an independent technical health and safety expert.

Smart Connection Consultancy is a boutique sport and recreation consultancy. Our staff are passionate about working with clients to develop communities and enable them to become more active through sport and recreation. We concentrate on Australian and international sport, recreation and leisure best practice. Our core areas of expertise include: •Synthetic sports surfaces; Smart Connection Consultancy offers an innovative approach that delivers outcomes that make a difference to local communities' participation in recreation and sport. We specialise in the planning, development, management and procurement of synthetic sports turf surface technology. We see synthetic technology as complementing natural grass and encourage more people to be active, play and achieve success in sport. •Sport and recreation planning

<https://www.smartconnection.net.au/> 31/10/2020

Council's FAQs are unclear as to whether Smart Connection Consultancy has been engaged to advise Council in relation to the Bob Campbell Oval project.

Mr Martin Sheppard, the principal of Smart Connection Consultancy, is a technical consultant for many of Australia's football codes. He has published a paper outlining environmental and sustainability considerations around synthetic sports surfaces but his paper does not address health and safety issues about which there is an increasing level of concern.

<https://www.smartconnection.net.au/wp-content/uploads/2019/11/Vol-3-Envirnmental-and-Sustainability-Considerations-v1.01.pdf>

Furthermore, Mr Sheppard is based in Melbourne and he has confirmed to community members via video link on 6 October 2020 that he has not actually inspected the Bob Campbell Oval site.

Given the unique features of the site, a grassed bowl surrounded by bushland adjacent to tidal mud flats, it is unlikely that he is able to advise the Council in detail about critical health and safety issues that are site-specific such as heat impacts of a synthetic surface in an area that lacks cross ventilation and is adjacent to a heat retaining rock embankment.

Section 8A(2)(c) of the NSW Local Government Act outlines a guiding principle that Councils must observe:

(c) Councils should consider the long term and cumulative effects of actions on future generations.

Councillors have a legal obligation to ensure that they have fully addressed the well documented health and safety concerns around synthetic surfaces before they vote on a concept plan for a \$3.6 million project that will replace the natural grass at Bob Campbell Oval. They cannot possibly do this on the basis of what has been made available on Council's website.

Many of the health and safety concerns around synthetic surfaces are outlined in the Safe Healthy Playing Field Inc fact sheet

<https://www.safehealthyplayingfields.org/fact-sheets>

They include:-

- toxicity of materials
- friction burns
- heat impacts.

The Western Australian government has published a guide to decision making around turf v synthetic surfaces that addresses key health and safety issues in addition to analysis of ongoing maintenance costs of the two surfaces.

<https://dlgsc.wa.gov.au/sport-and-recreation/facility-management/natural-grass-vs-synthetic-turf-decision-making-guide>

It is hoped that Councillors will ensure that they are fully informed about these issues before their vote in November.

9. **Environmental Impact Statement required under Section 5.7(1)(a) of EP&A Act**
Councillors lack sufficient detail of the environmental impacts of the proposed works to ensure that Council will comply with the requirements of Section 5.5 of the Environmental Planning and Assessment Act.
Councillors should require inclusion in the exhibition documents of a full environmental impact statement in accordance with Section 5.7 of the Environmental Planning and Assessment Act.

Section 5.5 (1) of the Environmental Planning and Assessment Act requires Council to take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of what is proposed at Bob Campbell Oval. This obligation overrides the provisions of all other legislation.

Council must not carry out an activity, or grant an approval in relation to an activity, being an activity that is a prescribed activity, an activity of a prescribed kind or an activity that is likely to significantly affect the environment, unless—

- (a) the determining authority has obtained or been furnished with and has examined and considered an environmental impact statement in respect of the activity—
 - (i) prepared in the prescribed form and manner by or on behalf of the proponent (s5.7 EP&A Act).

Council must form a view as to whether the work proposed at Bob Campbell Oval is an activity that is likely to significantly affect the environment.

Based on the information discussed in more detail below, Council can arguably only form the view that the impacts may be significant.

At the very least, Council does not have sufficient information before it to form the requisite opinion as to whether the activity is likely to significantly affect the environment.

Bob Campbell Oval is located in an environmentally sensitive location that is valued by the community. There is a widespread level of concern around the impacts of the proposed works on the environment – this is clearly articulated in the submissions that have been copied to the GCA.

- It is on riparian land – this is reflected in Council’s LEP.
- It is a natural grassed open space.
- It is located adjacent to bushland.
- It is adjacent to intertidal zone mudflats and mangroves.
- It is habitat for a range of fauna, including a number of threatened species.
- It drains directly onto the intertidal zone.
- It absorbs heat and carbon dioxide.

- It does not emit fumes.

Preliminary Terrestrial & Aquatic Fauna study September 2020

The Preliminary Terrestrial & Aquatic Fauna study by Council's consultant, applied ecology Pty Ltd, is clear that it is a **preliminary report that includes the collation of fauna records from previous studies, Council's fauna database and public databases (BioNet, ebird, Birdlife); and results from initial field investigations** (report author's emphasis)

It is unclear how much technical detail about the proposed works, particularly in terms of the material to be used for the synthetic sports field, was made available to Council's consultant, to assist in the compilation of its report.

The report notes that Council has commissioned a technical report that addresses the potential environmental impacts of crumb rubber and leachates and should be read in conjunction with this report. This technical report is not included in the list of references appended to the report.

If applied ecology Pty Ltd is referencing the Smart Connection Consultancy Pty Ltd FAQ Infosheet on Council's website, for reasons outlined in 8 above, the consultant should have access to alternative technical information that is specific to the Bob Campbell Oval design detail.

The applied ecology Pty Ltd report has been compiled without information as to the heat sink effect of the synthetic surface, an aspect that is of great significance, given the heat retention of the rock embankment below Northwood and the fact that there is no cross ventilation until late in the day.

Furthermore, there is no detailed information as to the process whereby Council will trap and filter fine microplastics, crumb rubber and leachates particulate from the synthetic material.

The applied ecology Pty Ltd report is very clear that there will be significant environmental impacts arising from the proposed works:-

*In summary, **impacts on species utilising the existing grassed surfaces will be high**; species utilising the immediate surrounds may be impacted by changing patterns of usage including increased noise, physical disturbance and light spill; species in adjoining areas of Gore Creek Reserve are less likely to be impacted although slight shifts in assemblages around the oval may have flow on impacts up and downstream; **and the freshwater section of Gore Creek adjacent to the oval and the intertidal area which may be impacted by any changes to site hydrology and the environmental impacts of crumb rubber and leachates** p 32*

The report has several significant comments and findings:-

- *Six **threatened nocturnal species** have been recently recorded utilising the study area p 32*

- *The majority of threatened species and mammals currently recorded in the study area are microbats and microbats **would be impacted by changes to lighting regimens.** p 33*
- *With no increase in events or hours of operation proposed noise impacts on wildlife should remain unchanged post construction – **but the whole purpose of the Bob Campbell Oval plan is to increase usage!** p 34*
- ***Areas of artificial turf do not provide any resources for fauna** p 34*
- *Off field impacts are dependent on the movement of crumb rubber and leachates from the area of artificial turf. Generally crumb rubber infill breaks down to larger particles that are moved by water and smaller particles that can become airborne. Stormwater that moves through the crumb rubber matrix has potential to absorb and mobilise leachates from the car tyre material. **This has the potential for environmental impacts in terrestrial ecosystems through smothering; freshwater ecosystems through leachates and micronized particles; and in marine ecosystems through smothering as tidal mudflats are a likely resting place for larger particles and micronized particles.** Particles can become bound with algae and fine organic and inorganic sediments. The result is likely to be a smothering layer with **potential to increase heat within the mudflats** which can result in localised warming of seawater which would impact on marine organisms and freshwater species that complete part of their lifecycle in the estuary (for example Striped Gudgeons that migrate up Gore Creek from the bay as they mature). **Ingestion of micronized particles is still poorly understood but is now recognised as a major problem for marine animals and is likely to also affect freshwater organisms** (Halle et al, 2020) p 35*

Submissions from Community

Many submissions from community members address concerns about the environmental impact of the synthetic playing surface and lighting.

Of particular concern are:-

- the lack of detail around how Council will ensure that no fragments or particles will enter the waterways that are adjacent to the Bob Campbell Oval site, including those on the shoes of users of the synthetic field after they have left the field of play
- the lack of detail around how Council will ensure that no toxins are leached into waterways
- site specific heat impacts
- impact on habitat.

An Environmental Impact Statement is required in the light of the many environmental concerns raised in the applied ecology Pty Ltd report and in the submissions of many community members

Council's own environmental consultant and scores of community members have highlighted that the proposed synthetic surface is likely to significantly affect the environment.

For this reason, **Council must comply with the provisions of Section 5.7(1) (a) of the Environmental Planning and Assessment Act and obtain an environmental impact statement in respect of the works at Bob Campbell Oval and furnish it to the Planning Secretary.**

5.7 Decision of determining authority in relation to certain activities

(1) A determining authority shall not carry out an activity, or grant an approval in relation to an activity, being an activity that is a prescribed activity, an activity of a prescribed kind or an activity that is likely to significantly affect the [environment](#), unless--

(a) the determining authority has obtained or been furnished with and has examined and considered an [environmental](#) impact statement in respect of the activity--

(i) prepared in the prescribed form and manner by or on behalf of the proponent, and

(ii) except where the proponent is the determining authority, submitted to the determining authority in the prescribed manner.

10. Proposed configuration of the synthetic field will reduce, not increase, scope for even current users.

The only community group with whom Council consulted prior to lodgement of the project nomination under the Precinct Support Scheme was the Greenwich Sports Club.

The nomination document contains extensive detail about the need for Bob Campbell Oval to meet the increased training and competition requirements of soccer teams.

It is ironic that the dimensions of the proposed sports field will fail to meet several of the competition needs of the sport for which it is intended.

Furthermore, the proposed raised, picket fence design will make it impossible for senior cricket games to be held on the ground.

The close proximity of the picket fence to the field of play will make the ground unappealing for other contact sports. Council has provided no information as to the sporting codes that have approved the current plan.

In effect, the proposed expenditure of approximately \$1.7 million of grant funds (as per the budget submitted with the project nomination) will be expended on a playing surface that will have less versatility and community support than the current natural grassed field.

11. Council has provided no business case to support its selection of a synthetic surface for the sports field.

It is noted that Council's 2016 – 2026 Open Space Plan includes the following Action item

*“Identify if any further playing field sites are suitable upgrade for synthetic surface sports fields and **if feasible develop a business case to support funding requirements**”.*

Council has offered no business case to support the current proposal to create a synthetic sports field at Bob Campbell Oval.

Given the quantum of the grant from DPIE, Councillors must require a full business case in respect of the Bob Campbell Oval plan to ensure that it represents the best use of funds for the widest community benefit within the eligibility conditions of the Precinct Support Scheme.

This is what Councillors would require if Council was contemplating the expenditure of its own funds.

The same rigour should be applied to the allocation of the \$3.62 million under the DPIE grant.

12. Comments on elements in the plan

The Council's website and the displays at the Council drop-in sessions provide minimal detail about the specific design elements of the Master Plan.

It is unacceptable that the community should have just one opportunity to provide input on a plan that so lacks detail.

And it is even more concerning that Councillors may be asked in November to give blanket authority to Council officers to proceed with a plan about which they will have minimal detail.

We wonder if this would have been the case if Council's own funds were to be expended, rather than a generous \$3.6 million grant?

We make the following comments, noting the lack of information available and the apparent changes of scope that have been alluded to (but not confirmed in writing) in discussions with some Councillors and with Council officers.

Overall plan

The dimensions of the synthetic sports field, its elevation and the picket fence have dictated the use of remaining space to the extent that the elements of the design are disconnected from one another, impose structure on the use of space that is characterised by flexibility, diminish the natural bushland aspect of the site and generally reduce the site to more of a theme park, totally at odds with the natural haven it now is.

Recreation preferences of residents of St Leonards South

Residents of the new population centres in St Leonards and Crows Nest will lack natural green open spaces.

This has been raised consistently by the community since 2015.

There may be some marginal increase in greenspace if part of Canberra Avenue is closed but this will not be sufficient to meet the needs of the 10,000 additional residents expected within 1 kilometre of Bob Campbell Oval as predicted in Council's project nomination.

Council's project nomination states that ***"the upgrade to Bob Campbell Oval playing field, amenities and Shared User Path (SUP) connections will address the Premier's Priority; "to increase proportion of homes in urban areas within 10 mins walk of quality green, open and public spaces by 10% by 2023".***

What is contemplated in the Bob Campbell Oval Master Plan is exactly the opposite – reduce the green, reduce the openness and reduce access (unless you are a soccer club team member).

Raised sports field and boundary picket fence will limit flexibility around use of space

Regrettably the specifics of design in Council's published material are minimal.

The artist's impressions on the website are unclear and misleading as to the proposed height of the sports field and the distance between it and the fitness track proposed for the perimeter of Bob Campbell Oval.



This is what the GCA has been able to establish:-

- there will be no excavation on the site (per Council's FAQs)
- the playing surface is on riparian land
- it must be raised above the flood plain
- the height of the drainage platform above ground level will be up to 400mm
- a 200mm kerb will be needed to trap particulate matter from infill
- an 800mm picket fence will be required for OH&S reasons due to the 200mm kerb.

We have no information as to the filtration system to extract synthetic material from surface water and where and how water will be drained from the field.

Based on what we have been able to establish from Council's consultant, Mr Martin Sheppard, and from Mr Ted Webster of Council the playing surface relative to the surrounding area will look like this:-



We have no detail as to if or how the surrounding areas will be ramped up to the playing surface level, nor have we detail as to disability access. If the surrounding land is to be sloped up to the level of the playing surface, this will reduce the amount of grassed space between the picket fence and the fitness track.

It is noted that the picnickers depicted in one of the images above will be seated well below the surface of the sportsground.

Amenities block

This is a welcome inclusion in the plan.

Car park

It is regrettable that the car park is proposed to encroach so far into what is now a grassed area.

It is apparent that the established trees near the current car park will be removed. Council has not provided any detail as to whether the trees will be replaced.

It appears from the website that the parallel car parking spaces going up the hill will be lost with the shared user path, as will the spaces to the south west of the aquaduct.

Netball Court

The location of the netball court within the car park poses significant liability issues for Council in terms of both personal injury and vehicle damage.

On soccer training nights, presumably the netball court will give way to parking.

Fitness track

The proposed fitness track around the oval is a welcome inclusion but, again, no detail. Council has provided no information as to tree removal, surface material or width.

It is noted that the track actually abuts the perimeter fence around the sports field on all corners – this is where dogs will be walking/running to access the proposed off leash dog area on the western end, thereby posing significant liability considerations in the event of dog/human accidents.

Off leash dog area at western end

There could not be a worse designated position for a proposed dog area – it is adjacent to bushland and significant Council resources will need to be expended to ensure that dogs do not enter the bushland unleashed.

Furthermore, the location is shaded and grass will struggle to survive with dogs being confined to a smaller area than has been the case at Bob Campbell Oval.

Playground

The proposed playground is located away from the line of sight of those walking dogs or watching sport on the sports field. This poses a major liability risk for Council.

It is not sufficient for Council to pass responsibility for child safety on to parents. Council has a legal duty to ensure that its facilities are inherently safe and this cannot be assured with a playground in its proposed location so close to the water and the car park.

We have no detail as to sun protection in this location – not a problem when the play equipment was located at the shady western end.

Lighting

Given that one of the underpinning reasons for the Bob Campbell Oval works is increased usage, it is assumed that lighting will be used more frequently.

Noting that Bob Campbell Oval is surrounded by houses and bushland, it is important to have details of the proposed hours of use of the lights.

The FAQs state simply that *“the Sportsfield lighting will be turned on during requested hours when the field has been booked for use”*.

What does this actually mean in terms of disturbance (lighting and noise) to adjoining residents and fauna?

Shared User path (SUP)

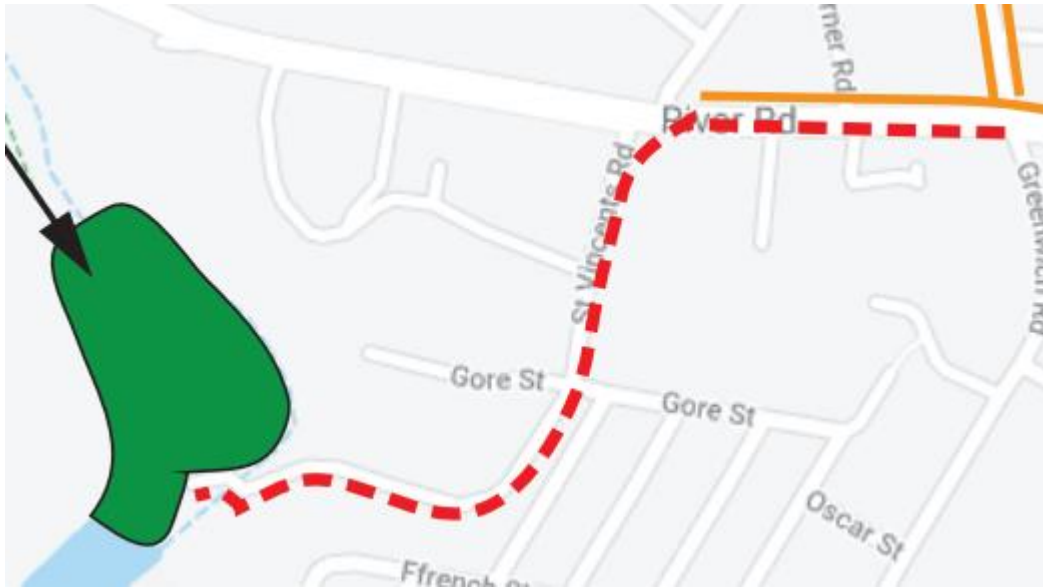
The SUP path is a welcome inclusion in the plan.

It is also integral to the success of Council’s project nomination and should, therefore, be the first element to be delivered with the grant funds.

Council has included in its nomination a budget of \$531,575 for the SUP.

For this reason, it is concerning that there is almost no detail about the route of the SUP and when and how it will be delivered.

The Council’s project grant application shows the route below:-



This route is not reflected in the material on Council's webpage for Bob Campbell Oval. Nor is there detail in terms of how the SUP will link St Leonards South with Bob Campbell Oval.

There are concerns that the route shown will be difficult to deliver from an engineering perspective and that it abuts two of Council's ten traffic black spots.

For this reason, the complete detail of the SUP and a guarantee as to its deliverability should be in Council papers in advance of the November Council meeting.

11. Council's Community Engagement Policy has not been followed.

The information available to the community in the consultation process about the works proposed at Bob Campbell Oval does not meet the requirements of Council's Community Engagement Policy.

Principle (d) of Council's Community Engagement Policy states that

"Council will provide information to consultation participants that is accurate, unbiased, and complete, that will provide opportunities for the community to form sound opinions and decisions".

The detail included on Council's website about the Bob Campbell Oval project is insufficient for the community to make informed comment as to the scale, design elements and impacts of the proposed works.

The artists' impressions on the website do not correlate with the detail in the aerial view of the Bob Campbell Oval and the Council's markings on the oval site are inadequate in terms of giving the community a clear indication of the relationship of the design elements to one another.

Council has failed to comply with its own Community Engagement Policy.

Summary

\$3.62 million is a lot of money.

It should be spent on a project that has community support, not on a project that will benefit a limited number of stakeholders.

It should be spent on a project that will enhance quality green, open and public space for Greenwich and adjacent communities

It should not be spent on a project that includes a synthetic sports ground that brings with it significant environmental, health and safety concerns.

We request Councillors to:-

- reject the Bob Campbell Oval Master Plan on the grounds that the plan includes a synthetic sports ground
- request the Minister for Planning and Public Spaces to retain the allocation to Lane Cove Council of grant funds under the Precinct Support Scheme to be applied to an eligible project to be identified through a full review of existing and potential open space and sporting fields in the Lane Cove LGA
- ensure that all relevant stakeholders, including community members, are included in this review
- include in this review detailed technical advice and costings as to the installation and maintenance of natural turf on Bob Campbell Oval.