

## **Sport & Recreation Planning Panel Submission**

**Presented 03 May 2023 via zoom**

I am presenting on behalf of the Greenwich Community Association.

We feel that a proposal of this magnitude warrants greater scrutiny than it has received to date.

The so-called “assessment report”, on which the Panel has asked speakers to concentrate, lacks rigor. There is little, if any, critical examination of the application, no independent analysis and a cursory attention to matters raised in public submissions.

It contains vast and unquestioned repetition of parts of the applicant’s documentation – and appears to meekly accept this.

Hence the Panel needs to critically approach the so-called assessment report with caution.

### **Access**

Access is critical and integral to any major development, such as this proposal. However, a firm proposition for access is not part of this application.

We are asked to take it in good faith that the signalized intersection, which has been floated, but will be dealt with by some other process, will be acceptable and implemented.

Why has this been accepted without question?

(I should also point out there is no such thing as an approval under Part 5 of the Act)

How can the Panel be satisfied or confident in its decision making, when a critical element, essential to the operation of the development, is missing from the application?

The mooted intersection, the only point of access to the site, is not part of the assessment. There is a hole in this proposal.

This omission is a critical flaw in the application, constituting grounds for its rejection, or at minimum, deferral until the access proposal is included in the application.

Nonetheless, the proposal proceeds on the basis that the main means of access to the site will be by private car or mini-bus.

Is this reasonable or responsible in this day and age of awareness of sustainability?

This suggests that the proposed development is not well located.

Further, whilst the development provides for car parking, there is limited space for mini-buses to drop off or pick up, and there does not appear to be any provision for mini-bus parking – even though this is said to be a major mode of transport access.

Is this reasonable? Where will these mini-buses go? Where will they park? Why has this not been assessed?

Coaches cannot access the site. It is stated that they can use the existing bus stop on River Road.

Is this a satisfactory or sustainable arrangement? Has this been assessed? What if there is more than one coach? How are conflicts with public transport buses managed? Where will coaches park? Will there be traffic congestion due to coach pickup and drop off? Are there safety implications to this arrangement?

For a multi-million dollar proposal this appears to be a very ad hoc arrangement – the merits or otherwise have not been assessed.

## **Traffic**

Traffic modelling has been undertaken to determine the impact of the proposal on the capacity of the local road network and determine car parking provision.

It is not clear from the application or the assessment whether the traffic impact of the facility has been modelled in isolation or whether it has considered cumulative impacts – given there are considerable new traffic generating developments nearby – such as the Pathways development at Northwood, 266 Longueville Road, the Greenwich Hospital redevelopment, the Greenwich Place development, as well as the South St Leonards precinct.

The assessment does not address itself to cumulative impacts – indeed its only conclusion is that the mooted signalized intersection (which is not part of the proposal) will be an improvement on what exists.

Again, this is inadequate.

## **Active Transport**

The application and assessment note pedestrian and potential bicycle links to the site.

However, there is no examination of the adequacy of these links, nor any commitment to improve such links due to the demands of this development. These links should be integrated with the proposal.

It seems ironic that a sport and recreation facility is not easily or safely accessible by foot or bike.

The footpath between the Greenwich Public School and the site is extremely narrow and dangerous. Kids from the nearest public school cannot safely walk to the facility.

There is no footpath between the site and Northwood Road on the southern side of River Road – Northwood residents cannot even access the mooted signalized intersection.

Where is consideration or assessment of these issues? Where is there a firm proposal or commitment to active transport linkages to the site? Why are such linkages not incorporated into the proposal?

An application for a grant to design potential improvements does not resolve these issues!

These issues need to be assessed by the Panel, because the assessment report does not.

If these issues can be resolved by conditions of any consent, then they should be.

If not, it serves as potential ground for the Panel to decline approval on the basis of this inadequacy.

### **Public Transport**

The assessment report – with no analysis – considers the site to be “well serviced” by public transport.

One bus an hour during the day (half hourly at peaks). A service which does not operate after 6pm on weekdays or 4pm on Saturdays and no service at all on Sunday.

This is a very different interpretation of “well serviced” than mine.

Again, we would contend this constitutes a deficiency in analysis in the assessment report, and also calls into question whether the development is well located.

### **Public Interest**

As you are well aware, s4.15 of the EPA Act demand consideration of social impacts, economic impacts and the public interest.

The application involves use of public lands, vast expenditure of public funds, impacts on private lands by a public authority.

However, the assessment report pays little or no regard to these matters.

Social impact conclusions are – there will be improved sports facilities.

Economic impact conclusions are – there may be some local jobs created.

We consider these conclusions are trite and deficient. There really is no demonstrable consideration of these impacts

It is only proper and in the public interest for the Panel to consider and weigh the economic impacts – the expenditure of public funds, the opportunity costs of expenditure of those funds and the value derived from such expenditure.

Also social impacts – will the community receive real benefit from the proposal? Will other Council programs be affected by the diversion of funds to the proposal?

These are legitimate and crucial issues pertinent to a public authority proposal.

These public interest issues have not been considered, indeed they have been dismissed out of hand.

The Panel does not have before it a legitimate assessment of social and economic impacts in the public interest.

## **Noise**

The assessment report notes and apparently accepts the conclusions of the acoustic report in the application.

Which says that predicted “noise levels...including the outdoor courts is consistent with the existing recreational use” and that noise levels at nearby residences will be similar or lower than at present.

And also contains an observation that “recreation noise is not typically deemed to contain annoying characteristics”

I’m not an acoustic expert, however, I cannot accept without question that 5 existing tennis courts, maximum 20 people on court, generates the same volume of noise as 4 courts being used for basketball – maximum 40 players on court, plus umpires, whistles, spectators and communication between players, or netball with 56 players on court.

There is no independent analysis of this, just an acceptance of the applicant’s consultant’s conclusions.

## **Nature of the site**

The Gore Creek Valley is a lovely location. It is a hallmark landscape within the Lane Cove Municipality.

The development site is in an environmentally sensitive area, surrounded by bushland.

Yes, the site has been modified over time and has been developed previously to its current use.

Yes, the site is appropriately zoned.

However, the proposal is a development on an industrial scale. Whether this scale and its context are suitable or compatible is a subjective issue, its height and bulk will certainly be transformative.

Its cumulative impact, together with other new developments in the Valley –will impact such natural and landscape values that remain.

However, there is no assessment of this.

We cannot comprehend how the assessment report can conclude “the development will have no adverse impacts”.

This conclusion has been reached with no demonstrable consideration apart from reiterating the development application documents

But just because it's permissible, doesn't make it acceptable.

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### **Alternatives**

We understand that the Panel is not a strategic planning body.

However, it is notable that Willoughby Council, at a site at St Leonards, close to the Pacific Highway and railway station, less than 2 kilometers from this site, proposes to develop a similar facility.

There are considerable concerns that the two facilities may cannibalise each other both in terms of usage and viability.

These issues were raised in earlier submissions, yet have been ignored in the assessment report.

It is a pity that the Panel cannot bump a few heads together and obtain greater cooperation or coordination between the two relevant Councils.

### **Conditions of Consent**

The assessment report presents an attachment with proposed conditions of consent, clearly drawn from a template or a cut-and-paste from elsewhere.

There is considerable tension within the proposed conditions which require the Council to report to itself or seek its own approval.

These conditions require examination to remove the apparent conflict of responsibilities.

## **Conclusion**

The assessment report has many inadequacies, it lacks rigor, it lacks evidence of independent inquiry, analysis or consideration. It suffers omission and lack of attention to impacts and significant elements of what is proposed.

It is our submission that the assessment report does not provide the Panel with a sound basis for proper and responsible decision making – it follows that the application as it stands should not be approved.

**Peter Staveley**

**GCA Committee Member**