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Ref: SSD 9835

Dear Karen

Re: SSD 9835 Sydney Football Stadium Redevelopment – MOD 2 – Response to Submissions

I refer to your letter dated 2 December 2020 requesting a response to submissions received during the recent exhibition of SSD 9835 MOD 2, which was publicly re-exhibited between 18 November 2020 and 1 December 2020.

Each of the matters raised in the five (5) agency submissions and one (1) community submission have been addressed in the enclosed submissions summary (Attachment 1). The matters raised, and more specifically the responses provided in the submissions summary, do not result in any aspect of SSD 9835 MOD 2 requiring amendment from the proposal as publicly exhibited.

In response to the Department's request, an updated drawing showing the east/west elevation as well as an updated figure depicting neighbouring properties with the correct boundary of the Concept Proposal (as modified) are respectively provided at Attachments 2 and 3.

For the reasons detailed in the exhibited planning statement, SSD 9835 MOD 2 is appropriate and supportable and does not alter the development insofar as the reasons identified by the Minister for Planning and Public Spaces for granting the original development consent. In accordance with section 4.55(2) of the EP&A Act, the Minister (or his delegate) may modify the consent as:

- the consent, as proposed to be modified, is substantially the same development as that originally approved; and
- the resultant environmental impacts are considered appropriate in the circumstances and can be appropriately managed and mitigated.

Should you have any questions regarding the enclosed information please contact the undersigned on 0412 775 365.

Yours sincerely



8 December 2020

Stephanie Ballango

Director

Consultant to Infrastructure NSW

ATTACHMENT 1 SYDNEY FOOTBALL STADIUM FITNESS FACILITIES SSD 9835 MOD 2 – SUBMISSIONS SUMMARY & RESPONSES

Issue	Infrastructure NSW Response
AGENCY SUBMISSIONS	
City of Sydney Council	
Environmentally Sustainable Design The response provided by the proponent with respect to the ESD is generally acceptable. However, the City reiterates previous comments made regarding water consumption. In sports facilities, water consumption for showers is likely to be one of the most significant end uses of main potable water. 3-star rated showerheads vary considerably in efficiency as there are 4 subcategories of performance. All leading manufacturers of commercial shower heads make models that deliver excellent service that perform in the 6 to 7.5 litres per minute category. Showers delivering more than 7.5 litres per minute, while they may be 3-star rates, do not demonstrate best contemporary practice. Higher performance should be specified rather than referring only to 3-star ratings.	- The Stadium Fitness Facilities is targeting a Gold LEED rating in conjunction with the Stadium and will be aiming for maximum points in the Indoor Water Use credit by achieving at least a 50% reduction in comparison to industry benchmarks. - A <7.5L/min flowrate has been specified for the showerheads which compares to a low range 3 Star WELS or high range 4 Star WELS rating. - This complements water efficiency measures for other tap fittings and WC fixtures and WCs and urinals will be flushed using rainwater captured from the stadium roof.
Landscape The landscape design report submitted with the RTS is general in nature and does not provide an indicative plant schedule. As such, there is insufficient information provided to assess the species selection for mass planting and plant mixes within the development to confirm whether a viable landscape design with improved biodiversity values is achieved for the development.	- The proposed plant schedule for the mass planting area mix A-M, in particular plant mixes A, B K, L, M are identified in drawings LA-001 or LA-003 which form part of landscape plans package that was submitted and exhibited as part of MOD 2. - Since the exhibition, the detailed package has been finalised and consequently the planting mix A, K, L, M and planting mix B are identified in the following drawings prepared by Aspect and provided at Attachment 4: - o SFS-ASP-00-DR-LS03XX01 Tree & Planting Schedule; - o SFS-ASP-02-DR-LS02XX00 Legend & Schedules.
The proposed internal planting on Level 0 is unclear as to whether planters or green walls are implemented. Whilst the design is based on biophilic principles, the use of green walls and internal planting must be designed for the conditions, which will be in partial to full shade, and limit	- Green walls are not proposed under the current design. - Internal planting is limited to pot plants.

Issue	Infrastructure NSW Response
the reliance on unsustainable LED growth lights for plant growth. The City discourages the use of synthetic green walls and planting that has no biophilic value. The use of planter boxes throughout the development are to be designed to provide adequate soil depth and volume for the provision of drainage and irrigation and comply with the Sydney Landscape Code.	
The landscaping proposed within the pool deck and cabana zone include two trees Cupaniosis anacardioides (Tuckeroo) that are proposed to be relocated from the southern abutment landscape to the eastern edge of the pool courtyard. It is unclear why these trees have been relocated. Nevertheless, it is recommended that all planter boxes and planting on slab in the eastern courtyard be designed to provide adequate soil depth and volume for trees and palms, screening hedges, mass planting and turf. The use of artificial turf is not supported not only for its artificial plastic nature, but contribution to significant heat loads in summer months. Any turfing is to designed using natural turf.	- The Tuckeroos are proposed to be relocated (from their originally approved location) to ensure the appropriate root balls and soil volumes can be achieved. In the currently approved locations, this would not be the case. - Turf is not proposed on the pool deck or cabana zone. A stone paver and hardwood timber is proposed in these areas as shown on the plans. - Planter boxes provide a minimum 600mm soil depth for mass planting. - The palm tree planter provides a minimum 1000mm soil depth and minimum 9m³ soil volume.
The submitted design report proposes extensive roof gardens on the Level 2 and 3 roof terraces using a native plant mix. However, these are misleading in that the plans and images provided are for perimeter planters with succulent species that are native to Mexico and South America. Whilst on trend and appropriate for a resort or hotel, the use of succulents in the landscape design is not considered sympathetic to the parklands and increasing biodiversity and habitat creation of the Moore Park and Centennial Park precinct.	- The proposed roof terraces planting selection is identified in SFS-ASP-02-DR-LS02XX00 Legend & Schedules and indicates 70% of the proposed species selection is native species. - The selection of Banksia and Grevillea specifically speaks to the Moore Park and Centennial Park precinct plants character.
The landscape design and plant schedule are to be amended to employ hardy native species with a preference for drought resistant species that contribute to habitat creation and biodiversity. Overall, the landscape package is to provide	- The detailed package has been finalised and consequently the planting mix A, K, L, M and planting mix B are identified in the following drawings prepared by Aspect and provided at Attachment 4: - o SFS-ASP-00-DR-LS03XX01 Tree & Planting Schedule; - o SFS-ASP-02-DR-LS02XX00 Legend & Schedules.

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further detail to public domain material schedules and plant schedules as well as details for all planters, planting on slab, green roofs and internal planting.	- The planting selections include native species such as Banksia and Dianella which contribute to the local habitat creation and biodiversity for the Moore Park and Centennial Park precinct.
Noise – Demolition and Construction Noise The updated Noise and Vibration Assessment Report, prepared by Arup, indicate additional works associated with the construction of the Stadium Fitness Facilities would marginally increase the predicted noise levels by 1dB at some receivers. Increases of 1dB are considered imperceptible to the average person and these noise levels have already been approved via previous consents.	- Noted
The occurrence of the predicted noise levels would also be infrequent due to the low likelihood of the additional concrete pump truck and mobile crane operating concurrently with all other modelled construction equipment.	- Noted
Due to the minor nature of cumulative increases to overall construction noise impacts, and the unlikely nature of cumulative impacts occurring, the increase in disturbance to the community due to the construction of the Stadium Fitness Facilities is considered low. Therefore, no additional noise mitigation is considered necessary due to the already approved construction noise levels.	- Noted
Mobile cranes can reduce noise levels through shielding as they are considered a static plant. It is recommended that shielding be required for the additional plant to demonstrate that all reasonable and feasible noise mitigation measures have been implemented.	- The DPIE-approved Construction Noise and Vibration Management Plan already identifies a suite of mitigation measures to reduce noise levels. Similar measures will be implemented during the construction of the Stadium Fitness Facilities.
Operational Noise Typical operational noise sources associated with Stadium Fitness Facilities include patron noise and music from the pool and outdoor café seating area and operational traffic generated by the Stadium Fitness Facilities. No additional external mechanical plant or equipment is required to operate the proposed facilities.	- Noted
The noisiest periods of operation would be during functions held in the Stadium Fitness Facilities, which may occur on event days or non-event	- Noted

Issue	Infrastructure NSW Response
days. Noise emissions from internal activities are anticipated to be insignificant due to noise reduction through the building envelope.	
Noise levels from patrons in the outdoor café, rooftop and pool area have been predicted for a total of 588 people in outdoor locations. All worst-case scenario noise predictions would comply with noise limits established for each receiver. The Stadium Fitness Facilities would meet the event and non-event noise limits, established at 10dB below noise limits for the main stadium. This demonstrates noise impacts resulted from the Stadium Fitness Facilities operation are predicted to be insignificant on event days.	- Noted
To ensure the satisfactory operation and management of the Stadium Fitness Facilities, the various management plans required to be prepared under the existing consent and associated implementation and monitoring measures should be integrated to apply to the Stadium Fitness Facilities. This will mostly likely require rewording of relevant conditions to reference the Stadium Fitness Facilities, particularly where alcohol will be sold.	- Prior to construction commencing, existing management plans will be updated to satisfy the existing conditions of consent and reflect the addition of the Stadium Fitness Facilities. It is requested the conditions be worded with sufficient flexibility to allow addenda to existing plans to be prepared depending on the circumstances of each specific report. - Prior to operation, Venues NSW will be required to prepare various operational phase management plans to satisfy the existing conditions of consent and reflect the addition of the Stadium Fitness Facilities.
Further, conditions of consent should be imposed requiring the construction, fit out and finishes of the ancillary food premises to comply with Standard 3.2.3 of the Australian and New Zealand Food Standards Code under the Food Act 2003 and AS 4674 – 2004 Design, Construction and Fit out of Food Premises. The hours of operation of the fitness facility as well as specific cumulative patron and music criteria should be stipulated for non-event days.	- Noted and agreed. - No objection is raised to the imposition of an appropriately worded condition to ensure food premises are constructed and fitted out in accordance with the applicable Australian Standards. - The general terms of operation including hours are as per the planning statement. - The music criteria is as per the submitted Noise and Vibration Assessment, which the City and the EPA have confirmed are acceptable and are not expected to raise any issues.

Issue	Infrastructure NSW Response
NSW Environment Protection Authority	
The EPA's submission to the modification, dated 18 August 2020, provided comments on noise and vibration. The EPA has reviewed the applicant's response in the following documents: • Response to Submissions SSD 9835 MOD 2 Sydney Football Stadium – Fitness Facilities, letter prepared by Ethos Urban, dated 11 November 2020 (RtS letter) • Noise and Vibration Impact Assessment, prepared by ARUP, dated 11 November 2020 (NVIA). The EPA has no further comments to make regarding the revised NVIA and RtS letter. However, it is noted that the current conditions of consent do not contain any conditions that control noise from the Member's Facility. As such, if noise complaints are received or other noise issues occur, there is no mechanism in the conditions that compel the operator to take any action.	- Noted
Although the Member's Facility is considered a low noise risk, as presented in the revised NVIA, the EPA recommends that a condition be added to the consent to provide a mechanism that requires the operator to take action in the event of complaints. This could be included as part of the Operational Noise Management Plan defined under D48, or as a condition inserted between E5 and E11 with words to the effect: <i>Where complaints are received relating to noise from mechanical plant, music, patron or other operational noise from the Member's Facility, the applicant must investigate the complaint and apply all reasonable and feasible mitigation measures to address the complaint.</i>	- No objection is raised to the imposition of the recommended conditions as drafted by the EPA.
Transport for NSW	
TfNSW has reviewed the submitted documents and is satisfied with the RtS, however requests that the suggested conditions included in the	- Noted and agreed.

Issue	Infrastructure NSW Response
TfNSW submission dated 18 August 2020 be included as part of any conditions imposed by the Department for the modification.	- No objection is raised to the imposition of the recommended conditions as articulated in the Response to Submissions SSD 9835 MOD 2 Sydney Football Stadium – Fitness Facilities, letter prepared by Ethos Urban, dated 11 November 2020 and supporting appendices including the updated Transport Assessment prepared by JMT Consulting dated November 2020.
Heritage NSW – Heritage Council of NSW	
The supplied response to submission documentation for the Sydney Football Stadium Redevelopment – Modification 2 is noted.	- Noted
NSW Health Service – Health System Support Group	
No comments necessary from health	- Noted
DPIE Biodiversity Conservation Division	
EES has reviewed the RtS table prepared by Ethos Urban dated 11 November 2020 and has no further comment to make as EES considers all issues outlined in previous correspondence dated 12 August 2020 (Ref doc20/633938) have been addressed.	- Noted
COMMUNITY AND ORGANISATION SUBMISSIONS	
Ward, Vivienne	
In this submission I seriously object to the proposed modification.	- Noted
Extending the land needed. The Modification has a very strong focus on the Stadium Fitness Facilities for Members. The modification presents a revision to the project boundary to capture the land on which the facilities are to be constructed. This is not acceptable. Even if the SCGST is willing to cede land to allow for a private Members' facility, this is still essentially public land.	- The extension of the project boundary to the south to facilitate the Stadium Fitness Facilities has already been approved under the Stage 1 Concept Approval SSD 9249. - The land in question is within the boundary of land owned and managed by the Sydney Cricket Ground and is currently occupied by part of the SCG's practice area, part of a tennis court located to the south-west of the stadium, and part of a wall extending south along Driver Avenue. It does not include any land currently used or available for public open space use by the public.

Issue	Infrastructure NSW Response
	- The extension of the project boundary was facilitated under SDD 9249 to reinstate the facilities that operated in conjunction with the former, demolished stadium in a new location on the site. This Stadium Fitness Facilities will extend from the vacant undercroft space below the SFS entry stairs to parts of the site that are already demolished or are vacant of significant structures.
The removal of the existing brick wall at Driver Avenue is unfortunate. There is no guarantee that the reconstruction will maintain the existing charm of this area. There is no sense in this document of the beauty of Moore Park.	- The submitted plans demonstrate that the wall proposed to be constructed will be contemporary panelled brick to the same height and general finish as the existing wall. - The Driver Avenue frontage of the site, and the SCG practice areas, will continue to be defined by the dominant brick wall that exists along this site frontage. The reconstructed brick wall and relocated Arthur Morris Gates will, therefore, ensure that the existing approach to the site and arrival experience remains unchanged, maintaining the existing streetscape within a parkland setting.
Public money for Private facilities. The cost for the SFS must be very close to \$1billion of public money by now. The Landscape Design for this project aims to create a sense of 'luxury and escape' within the Fitness Facilities. I do not think that this sits well.	- The project budget is not a planning consideration.
The Centennial Parklands provide enjoyment and relaxation for many more millions of people than will ever attend the SFS. The Parklands are expected to be self-funding.	- Noted. - The operational arrangements of the parklands are outside the scope of the current MOD 2.
Car Parking. The SFS rebuild has not taken the opportunity to provide any extended car parking on its land. While the MP1 car park will be reinstated, it is for only around 500 cars. This Modification actually suggests that the EQ Car Park can accommodate up to 2000 cars. It is very unacceptable to try to grasp an entitlement for this facility, in this document. This facility serves a range of Parkland users already.	- Noted. - The MP1 car parking arrangement were approved under SSD 9385 and was determined to be acceptable. - The Transport Assessment that supports MOD 2 has considered available parking options within the Precinct, including the EQ Car Park which is a valid option for many visitors, and demonstrates that there is sufficient parking available within existing and approved car parking areas.
Conclusion: The elitism of this proposal, at public expense, along with continued built impacts at odds with the natural beauty of Moore Park, should require very serious reconsideration of the suggestions.	- Noted.

