

# ETHOS URBAN

## Submissions and Amendment Report

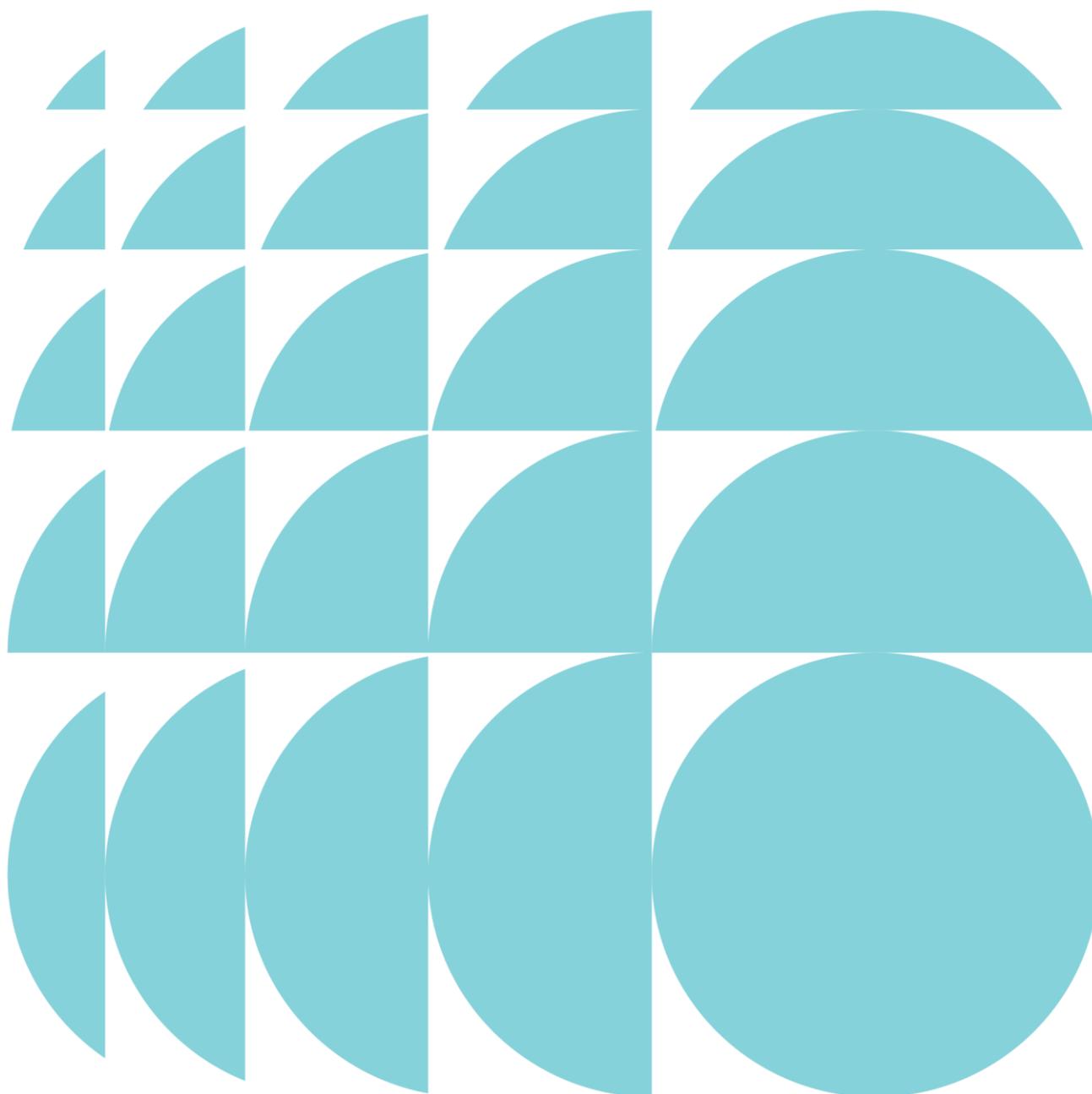
SSD 9835 – Sydney Football Stadium Stage 2

Modification 7 – Precinct Village and Car Park

Submitted to NSW Department of Planning,  
Industry and Environment

On behalf of Venues NSW

17 December 2021 | 2210490





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Further technical information and assessment authored by the consultant team has been directly integrated into this Submissions Report rather than standalone appendices; see the response to submissions at **Section 4.0**.

## Executive Summary

### Purpose of this Report

This Response to Submissions Report (Submissions Report) is submitted to the NSW Department of Planning, Industry and Environment (DPIE) as part of a Modification Application to State Significant Development (SSD) 9835, which relates to the introduction of a village community space, event plaza and multi-level car park to support the use of the Sydney Football Stadium (SFS) at 40-44 Driver Avenue, Moore Park.

The Modification Application and all supporting documentation was publicly exhibited between 28 October 2021 and 24 November 2021, during which time submissions were received from members of the public, public agencies, organisations and special interest groups. This Submissions Report provides a response to the issues raised in these submissions and provides additional assessment and information.

### Overview of the Project

Venues NSW is proposing to introduce a village community space, event plaza and multi-level car park to support the use of the SFS.

The vision for the Precinct Village and Car Park is set out below:

*The Precinct Village and Car Park provides a platform and canvas for an exceptional community asset and iconic design, that visually and physically connects to the adjacent Moore Park East and Kippax Lake. It provides patrons with quality café and dining experiences in an idyllic parkland setting and well-being play and relaxation nodes which engage with all ages. An event plaza, connected to the Stadium Plaza provides a seamless opportunity for greater patron and community engagement through non-event and event day functions (Architectural Design Statement, Cox August 2021).*

Principally, the proposed modification introduces a village community space and event plaza to complement the adjacent SFS and green space of the Centennial Parklands, while providing amenity for the community to sit, reflect, observe, congregate and pass through. To facilitate this, the currently approved 540 space at-grade car park will be replaced with an event plaza and Precinct Village above ground and a 1,500 space car park beneath. This will create a superior outcome whereby the currently approved car park will be repurposed into a more versatile community precinct space, ensuring the surrounding spaces of the SFS complement its distinctly 'event' focused character, and locate parking as unobtrusively as possible. The construction of the underground car park will catalyse the removal of on grass parking which currently has the capacity to accommodate 2,100 cars across the EP2 and EP3 parking areas. The overall reduction in car parking spaces post development is in line with Transport for NSW's objective to reduce car parking in the precinct.

More specifically, the proposed modification will facilitate the immediate removal of the northern portion of the EP2 (Upper Kippax) on-grass parking area within Moore Park opposite the MP1 Car Park (proposed to be formalised via a condition of consent) and the removal of the southern portion of the EP2 (Lower Kippax) on-grass parking area prior to the commencement of operation of Stage 2 of the Precinct Village and Car Park. The removal of on-grass parking from EP2 (Upper and Lower Kippax) will enable the permanent use of this space as public open space consistent with the Moore Park Masterplan 2040. Parking on EP3 (Showground) will be progressively removed by Greater Sydney Parklands in consultation with Venues NSW, Transport for NSW and Moore Park Events Operations Group (MEOG) pending successful development and implementation of precinct-wide transport plans with the view of removing all on-grass car parking in Moore Park once the Precinct Village and Car Park is operational. The Greater Sydney Parklands Trust Exposure Bill announced by the NSW Government seeks to legislate additional protections against on grass parking for Moore Park.

The Precinct Village and Car Park further responds to the strategic mandate of Venues NSW as a statutory authority under the *Sporting Venues Authorities Amendment Act 2020*. In terms of this Act, Venues NSW is responsible for the management, coordination and promotion of sports and entertainment venues across NSW. The project therefore addresses the NSW Stadia Strategy targeting investment for Stadia to become multi-use hubs with quality services and facilities, transport connectivity and highly activated entertainment precincts in the stadia

surrounds to promote better utilisation of Stadia infrastructure. Two particularly relevant Stadia Strategy Design principles are:

1. Transport Connectivity – Stadia should have good public transport access and appropriate parking capacity; and
2. Entertainment Precinct – Stadia should be surrounded by a vibrant entertainment precinct to enhance the match day experience.



**Figure 1 Proposed Precinct Village and Car Park between existing buildings and the approved stadium**

Source: COX Architecture

### Overview of Submissions

A total of twenty-two (22) submissions were received during the public exhibition period.

This included submissions received from the following government agencies and authorities:

- NSW Department of Planning, Industry and Environment (DPIE);
- DPIE Environment, Energy and Science Group (EESG);
- Heritage Council
- Heritage NSW
- NSW Environmental Protection Agency (EPA)
- Transport for NSW
- Sydney Water
- City of Sydney Council
- Randwick City Council

As well as this, the following organisations and special interest groups also provided a submission:

- University of Technology, Sydney (UTS) and Rugby Australia (RA) (joint submission)
- Action for Public Transport (NSW) Inc.

- The Paddington Society
- Paddington Darlinghurst Community Group

Nine (9) submissions were also received from the general public. The main issues identified within these submissions included:

- Traffic and parking
- Visual and built form
- Operational noise
- Tree removal
- Landscaping

### **Proposed Amendments to the Proposal**

Following the public exhibition of the Modification Application, the design team has had the opportunity to further progress the proposal including minor design amendments and finalising the fit-out of the proposed tennis club. This design development is minor and remains consistent with the design intent and scope of the exhibited project and has been reviewed by the Design Integrity Panel.

The proposed amendments to the proposal include:

- Simplification of the internal eastern and western carpark façades and the external southern and eastern façades by replacing the ‘hit and miss’ brickwork that was proposed up to the mezzanine slab edge with in-situ concrete planters with GRC planters, galvanized steel balustrades, perforated metal infills, and integrated crash barriers in-between columns.
- Replacement of the previously proposed stepping in the tennis club’s brick clad fascia between columns with polished blockwork that is consistent with materials used in the stadium.
- Replacement of the previously proposed green planted edge roof on the tennis club with pebbles in an artistic pattern.
- Raising of the plaza level on the eastern concourse to accommodate existing underground services and maintaining the head height for outside broadcasting compound area, while separating ramps for pedestrians and vehicles with different gradients to maintain DDA compliance.
- Provision of fit-out details for the tennis club, while the remaining retail tenancies that form part of the Precinct Village will be subject to separate and future fit-out. The tennis club will comprise bathrooms, storage areas, administration areas, small indoor gathering space, and a kitchen to support the operation of the fitness facilities.
- Revisions to the tree removal and replacement proposal as described in this Submissions Report.

These proposed design amendments were presented to the SFS Design Integrity Panel on 6 December 2021. The SFS Design Integrity Panel has confirmed its support for the design refinements as evidenced at Appendix D.

### **Additional Environmental Assessment**

The proposed amendments have been considered by the established Design Integrity Panel and Venues NSW’s consultant team in the context of the issues raised in submissions. The amendments do not result in any new or additional environmental impacts associated with the proposed development, and in some instances directly responds to the feedback received during the public exhibition of the proposed modification.

The information contained in this Submissions Report and the appended technical inputs have also provided additional and updated information with respect to the environmental impacts of the Precinct Village and Car Park. This confirms that the potential impacts of the development are acceptable and are able to be mitigated or managed including through the application of the SFS Mitigation Measures and conditions of consent.

## **Conclusion and Justification**

The proposed modifications have been subject to a Modification Application and subsequently, this Submissions Report. The potential environmental, social, and economic impacts, both direct and cumulative, have been identified and assessed as part of both the Modification Application and also as part of this Submissions Report. No significant adverse environmental, social or economic impacts have been identified by the proposed modifications in preparing the Modification Application of the Submissions Report.

Any potential environmental and cultural impacts identified during the public exhibition of the Modification Application have been addressed through design refinements and with additional assessment as set out in this Submissions Report. Any residual impacts will be mitigated through the implementation of measures for the construction and operational phases of the proposal.

The potential impacts of the development are acceptable and are able to be managed, as outlined within the safeguards and mitigation measures contained within the Modification Application and its appended technical reports, and this Submissions Report.

## 1.0 Introduction

### 1.1 Overview

Venues NSW has lodged with the NSW Department of Planning, Industry and Environment (DPIE) a Modification Application under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to modify State Significant Development (SSD) Consent 9835 relating to the Stage 2 detailed design, construction and operation of the Sydney Football Stadium (SFS) at 40-44 Driver Avenue, Moore Park. The proposed modifications relate to introducing a village community space, event plaza and multi-level car park to support the use of the SFS, at the site of the current MP1 Car Park at the Northern portion of the site.

The Modification Application was placed on public exhibition between 28 October 2021 and 24 November 2021. The submissions received during the exhibition of the Modification Application form the subject of this Submissions Report.

This response identifies and provides an assessment for each of the matters raised in the submissions received during the public exhibition period. It should be read in conjunction with Modification Application and all supporting information dated 15 October 2021. This response has been prepared in accordance with Section 55 of the *Environmental Planning and Assessment Regulations 2000* (EP&A Regulation), as well as the *State Significant Development Guidelines Appendix C: Preparing a Submissions Report Guideline*.

### 1.2 Purpose of this Report

The purpose of this Submissions Report is to respond to submissions raised by community, organisations and government stakeholders during the exhibition of the Modification Application. This Submissions Report has been prepared to satisfy the provisions of Section 4.39(e) of the EP&A Act and Clause 85A of the EP&A Regulation. Each of the submissions received has been collated, analysed and the relevant issues have been addressed.

This Submissions Report also provides a description of the design amendments made to the proposed development pursuant to Clause 55A of the EP&A Regulation, which have been undertaken following further design development, to address submissions received, and also to reduce the overall environmental impact of the proposal. In addition to this amendment description, this Submissions Report provides further environmental assessment to accommodate the changes to the proposal and serves as an addendum to the technical specialist reporting provided within the Modification Application.

### 1.3 Background to the Development

#### 1.3.1 Overview of the Proposal as lodged

The proposal, as lodged, sought approval for the repurposing of the approved 540 space at-grade car park (MP1) at the western side of the SFS for a master planned Precinct Village and Car Park. This precinct was designed to align with the conditions and commitment established within SSD 9835, particularly relating to delivering a LEED Gold rated sustainable precinct, and would include:

- Up to a maximum of 1,500 space multi-level car park below the proposed ground level with the following access arrangements:
  - 1 x egress point onto Moore Park Road to be used on event days only;
  - 1 x two-lane access point from Driver Ave to be used on event and non-event days; and
  - dedicated area within the car park for operation/servicing vehicles.
- Reconfiguration of the currently approved drop off requirements for the elderly and mobility impaired.
- Free flow level pedestrian access to and from the SFS concourse from Driver Ave and Moore Park Road.
- Electric car charging provision.
- A versatile and community public domain, comprising:

- provision for 4 x north-south orientated tennis courts on non-event days with the potential to become an event platform on event days;
  - children’s playground;
  - 1,500m<sup>2</sup> cafe / retail / restaurants with associated amenities in a single storey pavilion (6 metre) low level;
  - customer service office and ticket window; and
  - vertical transport provisions.
- Utilities provision augmentation.
  - Inclusion of an additional condition of consent requiring cessation of:
  - EP2 (Upper Kippax) immediately upon approval of the Modification Application; and
  - on-grass event car parking associated with the use of the stadium within EP2 Lower Kippax prior to the commencement of operation of Stage 2 of the Precinct Village and Car Park.

**Figure 2** and **Figure 3** illustrates the Precinct Village and Car Park (as lodged) as part of the SFS redevelopment.



**Figure 2** Extract of the landscape plan showing the proposed refined treatment of MP1

Source: Aspect Studios



**Figure 3 Conceptual image of proposed Precinct Village and Car Park (dashed)**

Source: COX Architecture

## 1.4 Consultation activities prior to Public Exhibition

During the preparation of the Modification Application, a number of consultation activities with key stakeholders took place in order to create open dialogue. These consultation activities are documented in the S4.55(2) Modification Application prepared by Ethos Urban (dated 15 October 2021) and are summarised below.

### 1.4.1 Consultation with key stakeholders

A number of key public authorities provided comment and requested various inputs to be provided as part of the Modification Application documentation and this Submissions Report. These authorities included:

- City of Sydney Council
- Greater Sydney Parklands
- Transport for NSW (TfNSW)
- Infrastructure NSW
- Department of Planning, Industry and Environment
- NSW Treasury
- University of Technology Sydney (UTS)
- Rugby Australia
- National Rugby League (NRL)
- SFS Community Consultative Committee
- SFS Design Integrity Panel

During the DPIE's statutory public exhibition of the Modification Application, Venues NSW continued to actively engage with TfNSW, meeting on a fortnightly basis to discuss detailed technical and operational matters.

## 1.5 Action taken following exhibition

Following public exhibition of the Modification Application:

- Correspondence dated 30 November 2021 was received by Venues NSW from DPIE, requesting further information be provided to respond to the issues raised in the submissions;
- The project team has undertaken the preparation of updated design and further engaged with subconsultants to respond to this correspondence;
- The proposed design has been amended to respond to DPIE feedback and rationalise the design aesthetics of certain components of the proposal;
- Updated plans have been prepared by Cox Architecture and Aspect Studios, detailing the design amendments proposed;
- The proposed design amendments were presented to the SFS Design Integrity Panel on 6 December 2021; and
- This Response to Submissions Report has been prepared.

## 2.0 Analysis of Submissions

### 2.1 Overview

A total of twenty-two (22) submissions were received in response to the public exhibition of the Modification Application, including submissions made by government authorities and agencies, and the public, as set out in the following sections.

A response to each of these submissions has been prepared. An overview of the submissions and a summary of the process undertaken to ensure the submissions have been accurately responded to is provided below.

### 2.2 Government Agency Submissions

The following State government agencies provided a submission during the public exhibition period:

- NSW Department of Planning, Industry and Environment (DPIE)
- DPIE Environment, Energy and Science Group (EESG)
- Heritage Council
- Heritage NSW
- NSW Environmental Protection Agency (EPA)
- Transport for NSW
- Sydney Water
- City of Sydney Council
- Randwick City Council

No agency or authority has objected to the Modification Application with the exception of City of Sydney Council.

### 2.3 Public and Organisation Submissions

Nine (9) submissions were also received by members of the general community, and a further four (4) submissions were received from organisations and special interest groups comprising the following:

- University of Technology Sydney (UTS) with Rugby Australia (RA) (joint submission)
- Action for Public Transport (NSW) Inc.
- The Paddington Society
- Paddington Darlinghurst Community Group

Of these submissions received, seven (7) are lodged as an objection, five (5) are lodged in support, and the remaining one (1) submission is lodged as providing comments.

### 3.0 Amendments to the Project

As part of the actions taken since exhibition as described in **Section 1.5** above, the architectural teams have continued to progress the design of the Precinct Village and Car Park and doing so have identified opportunities to refine the proposal. The proposed amendments are detailed in the amended plans at **Appendix B** and **C** and comprise the following:

- Simplification of the internal eastern and western carpark façades and the external southern and eastern façades by replacing the ‘hit and miss’ brickwork that was proposed up to the mezzanine slab edge with in-situ concrete planters with GRC planters, galvanized steel balustrades, perforated metal infills, and integrated crash barriers in-between columns.
- Replacement of the previously proposed stepping in the tennis club’s brick clad fascia between columns with polished blockwork that is consistent with materials used in the stadium.
- Replacement of the previously proposed green planted edge roof on the tennis club with pebbles in an artistic pattern.
- Raising of the plaza level on the eastern concourse to accommodate existing underground services and maintaining the head height for outside broadcasting compound area, while separating ramps for pedestrians and vehicles with different gradients to maintain DDA compliance.
- Provision of fit-out details for the tennis club, while the remaining retail tenancies that form part of the Precinct Village will be subject to separate and future fit-out. The tennis club will comprise bathrooms, storage areas, administration areas, small indoor gathering space, and a kitchen to support the operation of the fitness facilities.
- Revisions to the tree removal and replacement proposal to:
  - remove a total of 45 trees to facilitate the Precinct Village and Car Park, including construction of a temporary construction road and diversion of a stormwater pipe; and
  - replace and undertake new planting of 110 trees.

A series of comparison images for the exhibited and amended design are shown at **Figure 4** and **Figure 7** below.

The development as modified necessitates the removal of forty-five (45) trees, including six (6) additional trees that will be removed from the construction of the internal access road and two (2) additional trees from the detailed design of the stormwater network. Two (2) trees that are proposed to be removed within the Precinct Village and Car Park site are already approved for removal. Forty-three (43) trees will be retained on the site, including one (1) that was previously proposed to be removed (Tree 138) as part of this Modification Application. A tree removal and retention plan illustrating the proposed design development changes is provided at **Appendix C** and included at **Figure 8** below.

A total of 110 additional replacement trees will be planted as part of the Precinct Village and Carpark, including advanced size (100L) trees at the completion of the Stage 2 works. The project as modified remains compliant with, and exceeding, the Concept Proposal and Stage 1 DA (SSD-9249) commitments to provide 1.5 replacement trees for every tree removed on the site.



**Figure 4** Changes to the eastern and western façades (exhibited left, proposed right)

Source: COX Architecture



**Figure 5** Changes to the tennis club (exhibited left, proposed right)

Source: COX Architecture



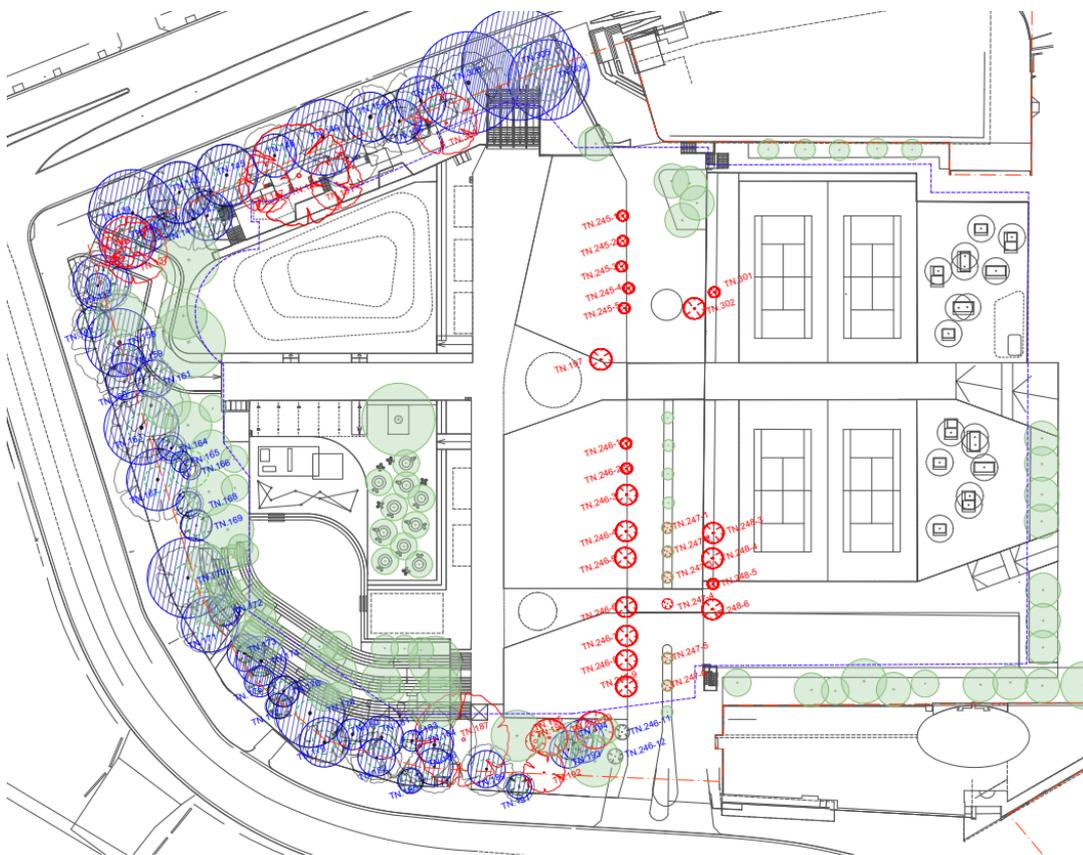
**Figure 6** Replacement of green planted edge to the tennis club roof (exhibited left, proposed right)

Source: COX Architecture



**Figure 7** Raised plaza level and access ramps (exhibited left, proposed right)

Source: COX Architecture



**Exhibited tree removal/retention plan**



**Proposed tree removal/retention plan**

**Figure 8 Comparison of tree removal and retention within the Precinct Village and Carpark site**

Source: Aspect Studios

## 4.0 Response to Submissions

### 4.1 Response to Agency and Authority Submissions

The following table (**Table 1**, overpage) includes a response to the full text of submissions provided by or on behalf of public authorities/agencies. The full text of each submission is provided in the left-hand column, accompanied by the corresponding response in the right-hand column. It is emphasised that the responses provided in this table have been authored with the technical consultant team.

**Table 1 Response to agency and authority submissions**

| Issue Raised  | Applicant Response  |
|---|---|
| <b>Department of Planning, Industry and Environment (DPIE)</b>  |   |
| <b>Design and Layout</b>  |   |
| <p>1. Provide:</p> <ul style="list-style-type: none"> <li>a) further detail of the proposed ESD and WSUD initiatives to be implemented as a part of the proposal, in accordance with the ESD report.</li> <li>b) a pavilion roof plan confirming the location of plant facilities, rooftop planting zones and whether it is proposed to implement a rooftop photovoltaic array to support on-site electrical generation.</li> <li>c) the location of public amenities within the proposal site.</li> <li>d) the location of electric vehicle facilities as per commitments approved in the original SSD-9835 application and noted in the ESD report or the potential to futureproof the implementation of electric vehicle infrastructure.</li> <li>e) the location of any end-of-trip and/or bicycle storage facilities for precinct village staff.</li> <li>f) an indicative wayfinding and signage plan.</li> <li>g) the detailed design of the children’s play area and whether the facility will include equitable access provisions.</li> <li>h) a detailed planting schedule, species selection and specifications as a part of the landscaping design package.</li> <li>i) a consistent approach to the location of planting areas on the architectural and landscaping plans.</li> <li>j) an amended basement and ground plane layout that enables the preservation of additional high retention value trees along the Moore Park Road and Driver Avenue frontage.</li> </ul> | <ul style="list-style-type: none"> <li>a) The amended plans have been reviewed by LCI and Arup with regard to sustainability and WSUD. The measures to be implemented are detailed in Sections 6 to 10 of the ESD Report exhibited as Appendix J of the Modification Application.</li> <li>b) As detailed in the amended architectural and landscape responses at <b>Appendices B and C</b>, the green edge on the roof has been replaced with pebbles installed in a visually interesting, artistic pattern. Small scale PV arrays (&lt;10kW per system) are also proposed to be added to the roof of the retail pavilion to balance the energy demands of highly glazed shopfronts under NCC 2019 requirements. This will also contribute to the LEED Energy reductions targeted.</li> <li>c) Bathrooms will be provided as part of the tennis club, and may be provided as part of the separate retail tenancies within the Precinct Village subject to separate and future fit-out in accordance with the requirements of the BCA.</li> <li>d) The exact locations of electric vehicle parking will be confirmed in the detailed construction drawings and will be provided for at least 2% of total spaces. The construction drawings will identify the locations of electric vehicle parking spaces as part of the future Crown Certificates. The Electric Vehicle Council of Australia reported that 1.57% of new car sales were electric vehicles in 2021, and as such providing a minimum 2% of spaces as electric charging enabled (hardware provided) is reflective of the current market demand and uptake. Additional chargers can be easily added as required at a future stage. In this respect, the electrical connection point at the main switchboard can be sized to accommodate additional chargers and can be isolated for works to occur without impacting the operation of the rest of the facility. The design of vehicle chargers allows for remote monitoring and control by various providers (e.g. Chargefox, Jetcharge) so that demand is managed to avoid overconsumption.</li> <li>e) The end of trip and bicycle parking facilities for precinct staff will be provided in the same location of the currently approved facilities, in accordance with Condition B50(b) of the consent. The proposed changes to Condition D33 described in the exhibited Modification Application will ensure the Precinct Village and Car Park complies with the requirements to provide suitable bicycle parking and end of trip facilities under Condition B50. It is also noted that Condition A55 of the consent requires updating of all relevant plans/strategies following the approval of any modification.</li> <li>f) Condition B12 requires that detailed public domain plans are prepared and submitted to the Planning Secretary including detailed wayfinding and signage locations prior to the commencement of construction of public domain areas within the site. Condition D22 further requires that the approved Wayfinding and Signage Strategy is updated and endorsed by TfNSW at least 6 months prior to the</li> </ul> |

| Issue Raised            | Applicant Response  |
|-------------------------|---|
|                         | <p>commencement of operations of the stadium. Wayfinding and signage as part of the Precinct Village and Carpark will follow the same principles that have been adopted for the remainder of the precinct, to ensure a consistent visual language. It is also noted that Condition A55 of the consent also requires updating of all relevant plans/strategies following the approval of any modification.</p> <p>g) Details of an equitable access children’s play area will be provided within the Public Domain Plan submission which is required as part of Condition B12 in-line with the SSD DA approval.</p> <p>h) Further detailed plans will be prepared at the construction phase of the project with consideration of the conditions of consent including Condition B12 and Condition A55 that requires updating of all relevant plans/strategies following the approval of any modification.</p> <p>i) The updated Architectural Plans and Landscape Plans at <b>Appendix B</b> and <b>C</b> identify tree planting in consistent locations across the site.</p> <p>j) The updated Architectural Plans and Landscape Plans at <b>Appendix B</b> and <b>C</b> reflect the revised tree removal and planting proposal reflective of the site’s constraints, proposed construction methodology and need to divert major stormwater infrastructure. The revised plans include details for the basement and ground plane levels as required by the DPIE. Since public exhibition, the design team and John Holland (as the appointed contractor for Stage 1) have further progressed the proposed Precinct Village and Car Park design and made a number of design refinements as described in <b>Section 3</b>, as well as refinements to the construction methodology. An addendum Arboricultural Impact Assessment has been prepared by Tree IQ and provided at <b>Appendix H</b> confirming that the proposal necessitates the removal of 45 trees (including 2 already approved for removal) and the retention of 43 trees (including one tree previously proposed for removal). Alternate options were explored for the internal access road off Driver Avenue and the stormwater network as part of the design development process, however, all feasible options were found to require the removal of Trees 193, 194, 246-11, 264-12, 172 and 181. Tree 138 was identified as being capable of being retained. Of the trees identified for removal, Tree 193, 194, and 181 were identified as being considered for retention and of moderate landscape significance. Trees 246-11, 246-12, and 172 are identified as being of low significance and are considered for removal. In response to this required tree removal, it is proposed to plant an additional 110 trees as part of this Modification Application, including advanced size (100L) trees at the completion of the Stage 2 works. This will ensure that the proposal continues to achieve and exceed the tree replacement target conditioned under the Concept Proposal and Stage 1 DA (SSD-9249) and that the Precinct Village and Carpark will reinstate the existing landscaped streetscape that is recognised as being a positive attribute of the existing MP1 carpark.</p> |
| <p><b>Transport</b></p> |   |

| Issue Raised  | Applicant Response   |
|---|--|
| Confirmation of compliance with relevant Australian Standards for off-street parking facilities (parking space dimensions, number of disabled parking spaces and number of motorcycle spaces).  | JMT has confirmed that the car park has been designed in accordance with AS2890.1 with respect to ramp gradients, circulation aisle widths and car space dimensions for Class 2 parking areas, including minimum 2.5m wide spaces and 5.8m wide aisles.  |
| The cumulative construction impacts are to be further investigated and assessed, taking into consideration the number of construction vehicles during the concurrent Stage 1 Precinct village and carpark and stadium construction works. | JMT has confirmed the peak construction vehicle flows associated with Stage 1 of the Precinct Village and Car Park project are scheduled to occur in second quarter 2022. At this time, the number of construction vehicle movements associated with the main SFS project will be significantly reduced from its peak load experienced in late 2020 /early 2021 when the above ground concourse works and roof construction took place. Therefore, due to this project sequencing the peak number of construction vehicle movements to the site, even when taking into consideration the Precinct Village and Car Park Project, will not increase when compared to the peak traffic load noted in the approved CTPMP for the main SFS project. This will be documented in the detailed CPTMP for the project as requested by TfNSW (as detailed further in the table below). |
| Confirmation that the Level 0 loading zone will support the precinct village retail / commercial operations or if this area will solely function as an overflow stadium loading zone.   | <p>Venues NSW confirms that the Level 0 loading zone will support the retail and commercial operations within the Precinct Village and Car Park site. As outlined in the submitted Transport Assessment (JMT Consulting, October 2021) exhibited with MOD 7, a standalone additional loading dock is proposed to support the approximately 1,500m<sup>2</sup> of retail and commercial uses.</p> <p>The loading dock is proposed to be provided immediately west of the vehicle rejection roundabout and has been designed in accordance with Australian Standards. The five (5) proposed service vehicle parking bays are considered more than adequate to service the expected demands generated by the retail and commercial uses.</p>  |
| Outline whether car spaces will be reserved on event days and non-event days for stadium and pavilion staff.  | Venues NSW confirms that spaces within the car park will not be reserved for stadium and pavilion staff on event days or non-event days.   |
| Outline whether 540 car spaces will be reserved for SCG Trust members in accordance with the former MP1 carpark use and if so, how this process will be managed on event and non-event periods.   | <p>Venues NSW confirms that car spaces will not be reserved for SCG Trust members.</p> <p>Carparking spaces will not be zoned for use by specific user groups in designed locations (except accessible spaces), but rather will be managed via a car park guidance system with parking sensors indicating available spaces. Parking attendants will direct flows on event days.</p>  |
| Clarification on whether parking sensors or attendants will be implemented to manage traffic flows and congestion.  | <p>Venues NSW proposes to implement a carpark management system such as parking sensors to manage traffic flows and congestion. The details of the system will be finalised prior to construction commencing as part of the detailed design phase.</p> <p>Parking attendants will be in place for high volume event, consistent with current practices.</p>  |
| Operational Hours   |  |
| Blanket operational hours cannot be applied to the Trust member's tennis courts, given that it is an external facility located within a different part of the precinct and is closer to surrounding                                       | For clarity, blanket hours are not proposed to be applied to the tennis courts. As outlined in the exhibited Planning Statement (Ethos Urban, October 2021), the tennis court  |

| Issue Raised  | Applicant Response   |
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| <p>sensitive (residential) receivers. As such, the proposed hours of use must be justified in the context of the potential acoustic and illumination impacts generated by the facility.</p> | <p>operating hours are proposed to be the same as the operating hours for the Stadium Fitness Facilities pursuant to Condition A56 of SSD 9835, being:</p> <ul style="list-style-type: none"> <li>• 5:30am and 11:30pm Monday to Friday;</li> <li>• 6:00am and 11:30pm on Saturdays; and</li> <li>• 7am and 11pm on Sundays.</li> </ul> <p>The exhibited Noise and Vibration Impact Assessment (Arup, September 2021) considered the proposed tennis court operating hours and concluded that the approved predicted noise levels were well within the noise limits established by the NVIA for both event and non-event days (refer to Tables 19 and 20 of the NVIA for details).</p> <p>Importantly, the NVIA demonstrated that the tennis courts would not have any impact on sensitive receivers including the closest residential receivers along Moore Park Road and non-residential uses including UTS, Fox Studios and Kirra.</p> <p>Pursuant to Condition D48, the approved Operational Noise Management Plan (ONMP) will need to be updated following approval of MOD 7 to identify operational noise mitigation measures for the Precinct Village and Car Park. The NVIA indicates that future mitigation measures will be required to control patron noise and music and building services. The ONMP will establish the appropriate mitigation measures for tennis court patrons if required.</p> <p>The exhibited Lighting Strategy (Arup, October 2021) similarly demonstrated compliance with the applicable Australian Standards (AS1158 Lighting for roads and public spaces, AS 4282 Control of the effects of Obtrusive lighting and AS2560 2.1 Outdoor tennis). As committed to in the Lighting Strategy, the lux levels for the tennis courts are proposed to be limited to 250 lux, and as within the entirety of the Precinct Village will be dimmed after 11pm to match the level of activity within the Precinct. This lower lighting level will comply with Australian Standards AS1158 and AS4282.</p> <p>To mitigate impacts to adjoining properties, the tennis court lighting will be directed downwards onto the courts away from sensitive receptors and to minimise any upward light. The luminaire fixtures will incorporate glare shields to minimise direct views and impact on neighbours.</p> <p>Subject to compliance with the applicable Australia Standards, proposed lux levels and dimming strategy Arup has advised Venues NSW that there will be no adverse light spill/illumination impacts to nearby residential properties and other adjoining properties.</p> |
| <p><b>DPIE Environment, Energy and Science Group</b></p>  |  |
| <p><b>Biodiversity</b></p>  |  |
| <p>The Section 7.17(2) of <i>Biodiversity Conservation Act 2016</i> (BC Act) requires a biodiversity development assessment report (BDAR) to be submitted with application to modify a</p>  | <p>As the consent authority, and pursuant to Section 7.17(2), the DPIE is required to consider whether the proposed modification will result in biodiversity impacts. The</p>  |

| Issue Raised   | Applicant Response  |
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| <p>development consent, unless the authority or person determining the application for modification is satisfied that the modification will not increase the impact on biodiversity values. Any proposed changes that would result in direct, indirect or prescribed impacts on biodiversity values not assessed in the original approval, are considered to constitute an increase in impacts</p> <p>EES notes that the proposed modifications will result in the removal of 39 additional trees, which may constitute an increase in biodiversity impacts.</p> <p>The applicant has provided the Arboricultural Impact Assessment Sydney Football Stadium Village Precinct &amp; Carpark arborist report, dated 6 September 2021, which stated that of the 39 trees to be removed, one was identified as “Priority for Retention” with seven trees identified as “Consider for Retention”.</p> <p>Importantly, the Arboricultural Impact Assessment stated that this assessment did not consider “[t]he ecological significance and habitat value of the trees has not been assessed and is beyond the scope of this report”.</p> <p>EES recommends that a consideration of the ecological significance, including habitat value, of all the trees identified for removal be conducted to support any decision on whether an increase in biodiversity impacts, as defined by the BC Act, is likely to occur thereby requiring the preparation of a BDAR.</p> | <p>Biodiversity Development Assessment Report (BDAR) prepared and approved for the Stage 1 Concept Plan (SSD 9249) (Jacobs, May 2018) provided a comprehensive assessment of the SFS project footprint, including the land the subject of this Modification Application. The BDAR concluded:</p> <ul style="list-style-type: none"> <li>• There are no threatened ecological communities located in or directly adjacent to the development site.</li> <li>• Roost camps are not present on the site for the Grey-headed Flying-fox and Eastern Bent Wing Bat (identified threatened species).</li> <li>• While planted trees provide a fruiting resource for the Grey-headed Flying-fox and Eastern Bent Wing Bat, the BDAR’s assessment of significance completed in accordance with the Matters of National Environmental Significance, Significant Impact Guidelines 1.1 (Department of the Environment 2013), and appended to the BDAR, was reviewed and endorsed by the DPIE, demonstrating no significant issues.</li> <li>• No threatened plant species listed under the Environmental Protection and Biodiversity Conservation Act, 1999 are considered likely to occur in the development site.</li> <li>• There are no natural habitats present on the site.</li> <li>• The site would not be classed as an ‘important habitat’ as the vegetation present on the site is not large enough or high enough quality.</li> <li>• The development would not substantially modify, destroy or isolate any areas of important habitat for migratory bird species and would not seriously disrupt the lifecycle of an ecologically significant proportion of a population of migratory birds.</li> </ul> <p>The BDAR’s impact assessment importantly concluded that while there is some native vegetation that has been planted on the land to which the Modification Application applies, the native vegetation is not naturally occurring and cannot be assigned to a Plant Community Type (PCT) or other vegetation zones as identified in the OEH BioNet Vegetation Classification. As a result, a vegetation integrity score cannot be determined in accordance with Biodiversity Assessment Methodology as there are no PCTs that will be impacted. The BDAR also identified that there are no threatened ecological communities located in or directly adjacent to the site, nor any indirect impacts on native vegetation or habitat resulting from the project on site. The construction and operation of the project is restricted to a discreet area and there are no adjoining areas of native vegetation beyond the development site that would be impacted.</p> <p>Furthermore, the BDAR concluded that threatened species that may use the site (such as bats) are capable flyers that are able to cover large distances between habitat patches. More specifically, the BDAR concluded that ‘the habitats that may occur in the site are not important or unique in the landscape and the project will have a limited effect on the current dispersal and movement of species throughout the locality’. Mitigation is not required as there will be negligible impact to the bioregional persistence of threatened species that currently benefit from the limited connectivity in the locality.</p> |

| Issue Raised  | Applicant Response  |
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|   | <p>The BDAR is conclusive – impacts are not anticipated given the lack of high quality ecological significance present on the site.</p> <p>In relation to the reference in the exhibited Arboricultural Impact Assessment that it did not consider the ecological significance and habitat value of the trees, this is simply a standard disclaimer that seeks to express that the Arboricultural Assessment’s purpose and scope was limited to tree health, not ecological impacts. Notwithstanding this, and in the context of the above, DPIE can be satisfied that the previous reasons for issuing a BDAR waiver remain valid to the Modification Application and consequently a new or updated BDAR is not required.</p>  |
| <p><b>Flood Risk Management</b></p>   |   |
| <p><i>Flood Modelling</i></p> <p>The flood model does not appear to be consistent with the architectural drawings. The drawings show a set of stairs connecting to Moore Park Road, adjacent to the proposed north-south road. These stairs would significantly impact flood behaviour and notably, this could exacerbate some of the concerns below.</p>   | <p>TTW (engaged by John Holland Group) has further developed the flood model based on the updated Architectural Plans and Landscape Plans. This updated modelling has included the PMF analysis and the hazard analysis for 5% AEP, 1 %AEP and the PMF event (see <b>Appendix G</b>).</p> <p>Several design solutions have also been reviewed specifically to determine a suitable flood solution design to reduce the flow directed overland toward the driveway between Stages 1 and 2. A reduction in the overland flow can be achieved via:</p> <ul style="list-style-type: none"> <li>• installation of a 1500mm diameter diversion pipe west of Stage 2;</li> <li>• an increased flow capacity via the overland flow path west of Stage 2; and</li> <li>• lowering the central driveway to delete the requirement for flood gates.</li> </ul> <p>The set of stairs connecting to Moore Park Road are not anticipated to significantly impact overland flow behaviour as they are intended to allow overland flow beneath.</p> <p>These are all matters of detailed design that can be appropriately documented in the construction drawings and addressed through the issue of the Crown Certificate at the relevant stage. It is also noted that Condition A55 of the consent requires updating of all relevant plans/strategies following the approval of any modification.</p> |
| <p><i>Flood Risk to the Development</i></p> <p>EES raises concerns around the introduction of highly hazardous conditions on the proposed new road. EES advises against the creation of a new road with an H5 hazard category in the 1% annual exceedance probability (AEP) flood in an area of minimal flood hazard under existing conditions. EES notes that in a probable maximum flood (PMF), the hazard would be greater, and that PMF hazard categorisation should be mapped.</p> <p>It would not be unreasonable to contain hazardous flows to the proposed central flow path within the road. However, the modelling results do not demonstrate that this is achievable. In the proposed design, flows are concentrated at the northern boundary, worsening flood hazard.</p> | <p>Arup confirms that the design developments described above address the concerns raised by EES. The 1% AEP modelling hazard condition has been assessed to be H1 for much of the driveway between Stages 1 and 2. The proposed turning head on the central road is within the H1 zone.</p> <p>The areas of H5 have been moved further into the site, and the H3/H4 extents have been reduced, ensuring there is no worsening of hazards.</p> <p>Furthermore, the project will be subject to an Emergency Flood Evacuation Management Plan to be prepared, submitted, and approved by the Certifying Authority prior to occupation in accordance with Condition D30 of the consent. This plan will include</p>   |

**Issue Raised**

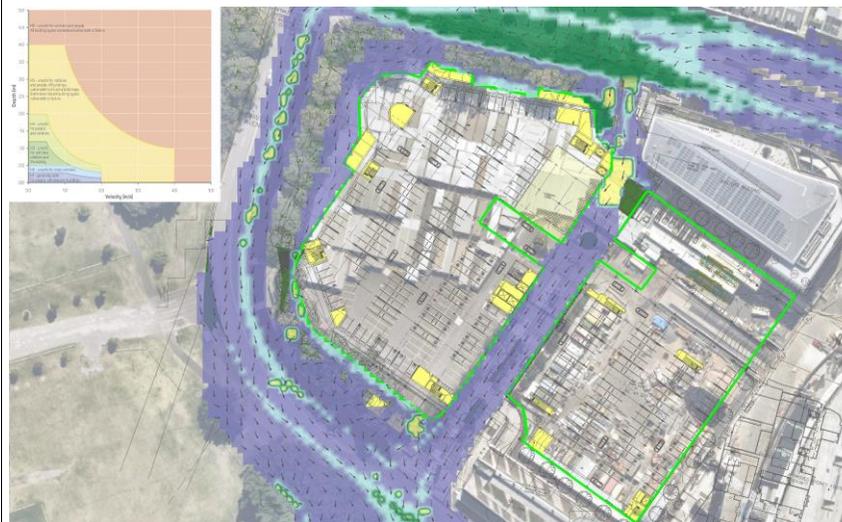
Further design work is recommended to ensure the safety of future road users. Otherwise, the proposal may result in a significantly increased requirement for government spending on emergency management services, flood mitigation and emergency response measures. A similar issue is present along the Moore Park Road frontage, where very high flood depths (deeper than one metre) are predicted under proposed conditions.

A design should be developed to demonstrate this will not create a new and very dangerous hazard for pedestrians. A dedicated overland flow path could be created.

Further concern is raised regarding the flood gates. The depths of flooding in a 1% AEP event appear low at the car park entries. Justification is therefore recommended as to why the car park cannot be afforded passive protection. The entries should be designed with crests to permanently prevent the ingress of floodwater in lieu of the proposed flood gates. Temporary flood barriers introduce an addition level of risk compared with permanent protection.

**Applicant Response**

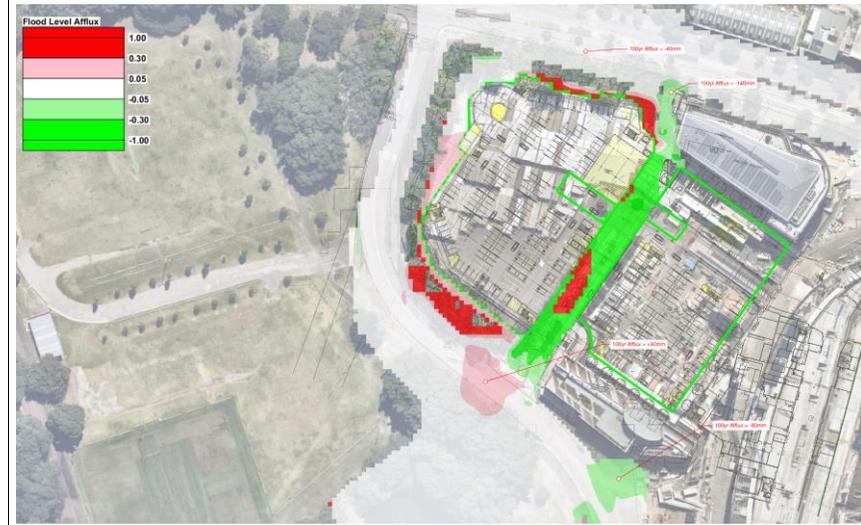
refuge in place during large storm events due to the hazard levels in the Moore park Road and Driver Avenues and incorporate the specific requirements of the development.



In relation to the carpark entries, as noted in Section 8.3 of the Precinct Village and Car Park (MOD 7) Stormwater and Flooding Assessment (September, 2021), the concept design provided permanent protection from 1% AEP overland flows grading of the central road. Flood gates were only included to provide protection beyond the 1% AEP up to the greater of the 1% AEP plus 500mm freeboard or PMF level, as required by the *City of Sydney Interim Floodplain Management Policy* for entries connecting to basements. As noted in the response to the previous comment, as part of ongoing design development the central driveway has since been lowered to remove the requirement for flood gates.

The afflux for the 1% event is as per the following. It shows there are some local improvements and local worsening of the flood conditions across the site in the 1% event. The effect of the development on Moore Park Road is a slight improvement. The effect on Driver Avenue is a localised worsening near the overflow point of 90mm, however Driver Avenue is flood affected at this point and the risk category remains H1 within the road reserve.

**Issue Raised** **Applicant Response**



*Flood Impacts*

Clarification is requested around the flood impact maps. Figure 8 is titled 1% AEP flood depth afflux map, while in Appendix A, Figure 004 is titled Peak Flood Level Change. The two figures appear to show the same information, and flood level impacts are the more robust measure of change. The consultant could justify using depth impacts if necessary and assuming depth impacts have not been used to mask true impacts.

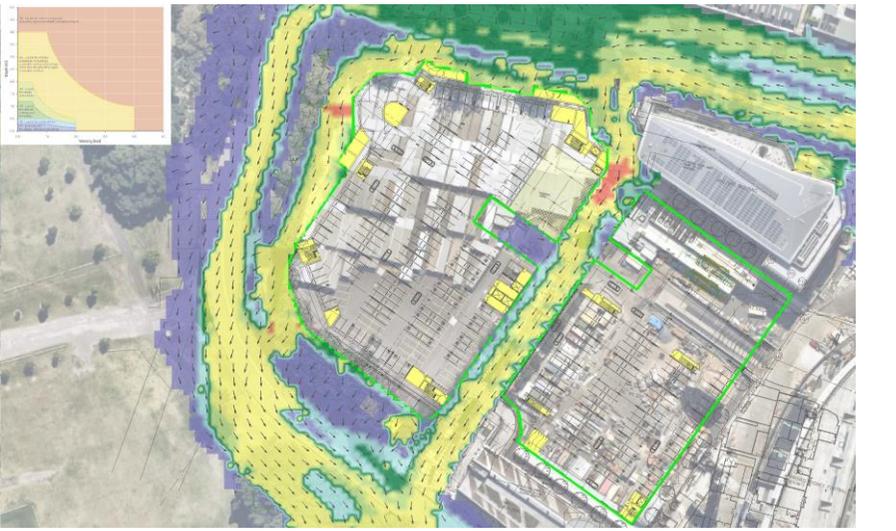
EES raises concerns around flood impacts to Driver Avenue. The Precinct Village and Car Park (MOD 7) Stormwater and Flooding Assessment, dated 6 September 2021, states flood levels would increase up to 50mm. However, the predicted impacts, as per Figure 8 of the Stormwater and Flooding Assessment shows up to a 0.3m increase in flood levels. This should be clarified.

Regardless, a 50mm increase is a significant adverse impact, well beyond the commonly accepted limit of 10mm. Notably, the highest increase occurs where the existing flood risk is greatest, exacerbating these conditions. EES recommends the applicant introduce mitigation measures to avoid worsening existing flooding conditions. Alternatively, the change in hazard category (H1-H6) could be mapped to assess if there is a significant change in hazard.

To provide clarification around the flood impact maps provided in the report, Arup confirm that both Figure 8 and Appendix A, Figure 004 display flood level afflux – the title of Figure 8 is incorrect and should read “Figure 8: 1% AEP flood level afflux map”.

In relation to Driver Avenue, as noted above, the developed design results in a localised worsening near the overflow point of 90mm in the 1% AEP event. Driver Avenue is flood affected at this point in the existing scenario and the risk category remains H1 within the road reserve.

A complete set of afflux maps for each event including the PMF are provided at **Appendix G**. The intent is for the Precinct Village and Car Park to function as a flood refuge location in large storm events as the road network during the PMF is a high hazard in the existing and the proposed conditions as shown on the PMF hazard map following.

| Issue Raised   | Applicant Response   |
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| <p><b>Aboriginal Heritage</b></p> <p>Heritage NSW has reviewed Modification 7 with respect to Aboriginal Cultural Heritage and has no additional comments regarding this proposal.</p>   | <p>Noted.</p>  |
| <p><b>Heritage Council of NSW</b></p>  |  |
| <p><b>Busby’s Bore</b></p> <p>The Heritage Impact Statement (HIS) does not explicitly discuss the SHR listing for Busby’s Bore (SHR #00568). This may have some bearing on the assessment of the heritage item in the context of the proposal, particularly where the application states it is not within the site. Figure 6 of the SOHI (p. 7) shows that the Bore runs underneath the study area, yet the discussion in the HIS, from analysis of historic plans and figures against the site presumes the Bore extends outside and to the north of the site. Heritage NSW (HNSW) notes that this should be clearly established in the HIS, not reliant on documentation that has not been ground-truthed.</p> | <p>Artefact has provided an updated heritage response at <b>Appendix F</b>.</p> <p>There are only two documented records of Busby’s Bore which are based on a survey of the interior of the Bore; that from 1835 and that from 1855. The 1835 plan has proved difficult to georeference without unacceptable errors. The 1855 plan, however, has proved to be generally reliable and has been used to predict the location of access shafts along the route of Busby’s Bore. Overlay surveys with the contemporary survey completed for the site indicates that the heritage item is separated from the proposed basement excavation areas associated with the Precinct Village and Car Park.</p> <p>In addition to the survey plan, further investigations are underway to verify the location of the heritage item in this portion of the site.</p> <p>At the instigation of John Holland, Usher &amp; Company surveyors have successfully relocated the previously assumed location of Shaft 8 and proven the location of the spur off Busby’s Bore. Artefact understands that Usher &amp; Company has further attempted to</p> |

| Issue Raised   | Applicant Response   |
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|  | <p>use remote sensing to plot the location and direction of the spur, but the spur was considered too deep under the sandstone to be detected.</p> <p>At the time of preparing this Submissions Report, John Holland and Usher &amp; Company are continuing to source a remote-control drone to go into the spur to confirm whether the spur's location can be physically surveyed. It is understood that this approach may not be implemented until late December or January 2022, and owing to the atypical nature of this process there is no guarantee that the remote-controlled drone will be successful.</p> <p>Any archaeological excavation to locate the Bore would be through 10m of sandstone and as such may not be feasible as an alternative to the above measures.</p> <p>Artefact has advised Venues NSW that although it may be desirable to ground truth the location of the Busby's Bore spur, there is no guarantee that methods to ground truth the location will be successful and as such to request a condition that the bore be definitely located is imposing a condition that might be impossible to fulfill without excavation. The current investigations represent best endeavours to accurately locate the position of the spur.</p> |
| <p>Busby's Bore is a listed item on the Sydney Water s170 Heritage Register (#4571074). HNSW therefore recommends that advice on the heritage asset and the proposed modification is sought from Sydney Water.</p>   | <p>Sydney Water's comments in relation to heritage are addressed below. Venues NSW and John Holland will continue to liaise with Sydney Water as the detailed design phase progresses and during the preparation of the updated Heritage Construction Management Plan.</p>   |
| <p>The HIS recommends that a Construction Heritage Management Plan (CHMP) be prepared, which should include: an updated version of the Methodology Statement- Working Near Busby's Bore; specific measures adopted to avoid direct and vibrational impacts to the spur and shafts of Busby's Bore; an archaeological methodology involving the monitoring of works within the vicinity of Busby's Bore and its shafts, as well as an Unexpected Finds Protocol for management of heritage identified outside of archaeological supervision; and heritage induction protocols. HNSW supports these recommendations.</p> | <p>Venues NSW welcomes the HNSW's support for the recommendations made by Artefact.</p> <p>To reiterate, Condition B39 of SSD 9835 already requires the preparation of Construction Heritage Management Plan (CHMP) by a suitably qualified heritage consultant. A CHMP has already been approved by the certifying authority in accordance with the requirements of SSD 9835 and is publicly available on the project website at: <a href="https://www.infrastructure.nsw.gov.au/media/2826/construction-heritage-management-plan.pdf">https://www.infrastructure.nsw.gov.au/media/2826/construction-heritage-management-plan.pdf</a></p> <p>Consistent with the recommendations of the exhibited Heritage Impact Assessment (Artefact, October 2021), the CHMP is proposed to be updated following the approval of MOD 7 to include:</p> <ul style="list-style-type: none"> <li>• an updated <i>Methodology Statement – Working Near Busby's Bore</i> (Infrastructure NSW, September 2018) to specifically reference the details of the Precinct Village and Car Park works;</li> <li>• specific measures that will be adopted to avoid direct and vibrational impacts to the spur and shafts of Busby's Bore;</li> </ul>  |

| Issue Raised   | Applicant Response   |
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|  | <ul style="list-style-type: none"> <li>• a commitment that an appropriately qualified archaeologist will supervise any proposed excavation works within the vicinity of Busby's Bore and its shafts under the guidance of an accredited excavation director;</li> <li>• an unexpected finds protocols for management of heritage identified outside of archaeological supervision; and</li> <li>• heritage induction protocols to enable staff to identify heritage material and manage it in accordance with requirements of the NSW Heritage Act (1977).</li> </ul> <p>In addition to the above, the Heritage Impact Assessment (<b>Appendix F</b>) has also recommended the preparation of a Construction Noise and Vibration Management Sub-Plan (CNVMP) to identify management measures to protect the archaeological heritage items including Busby's Bore in accordance with the requirements of the <i>Methodology Statement – Working Near Busby's Bore</i> (Infrastructure NSW, September 2018). A CNVMP has already been prepared and approved by the Planning Secretary pursuant to Condition B28 of SSD 9835 which includes the <i>Methodology Statement – Working Near Busby's Bore</i> and outlines additional management measures to further protect Busby's Bore. The exhibited NVIA acknowledged the approved CNVMP and included the <i>Methodology Statement – Working Near Busby's Bore</i> (refer to Appendix B). Moreover, the NVIA committed to updating the CNVMP and <i>Methodology Statement – Working Near Busby's Bore</i> prior to works commencing.</p> <p>There are accordingly sufficient mechanisms built into SSD 9835 to address HNSW's comments.</p> |
| <p>It is observed that a Construction Noise and Vibration Management Plan (CNVMP) has been approved for the development. The HIS recommends that a CNVMP be prepared which includes "...details of management measures to protect the archaeological heritage items including Busby's Bore in accordance with the requirements of the Methodology Statement– Working Near Busby's Bore..." (p. v, 5, 58). It is further noted that the Section 4.55(2) Modification Application report states that the approved Methodology Statement "...will be updated prior to commencement of works to ensure that vibration intensive works in the vicinity of Busby's Bore continue to be undertaken in a manner that minimises any risk of structural damage" (p. 40). HNSW supports this approach.</p>  | <p>Venues NSW welcomes the HNSW's support for Venues NSW's commitment to updating the <i>Methodology Statement – Working Near Busby's Bore</i>.</p>  |
| <p>HNSW recommends that the vibration monitoring assessment of Busby's Bore considers:</p> <ul style="list-style-type: none"> <li>• Physical access shafts/points to the Bore should be confirmed, which could be used to place the vibration monitor(s). For example, the HIS refers to Shafts 9–13 within the vicinity of the site and notes that Sydney Water plans indicate that two shafts are located on the spur beneath the site etc (p. 21–22).</li> <li>• If a new structure(s) is to be built directly over Busby's Bore or within its curtilage, then further design/engineering details depicting how these works and the carpark basement would interact with Busby's Bore, any Bore shaft(s) and the heritage curtilage would be beneficial, in order to demonstrate any (potential) heritage impacts on the item.</li> </ul> | <p>Artefact has advised Venues NSW that it may not be possible to physically access the Bore's spur to place vibration monitors.</p> <p>If, however, the spur can be located, then the location of vibration monitors will be addressed through the process of preparing the updated CNVMP. In accordance with Attachment 8 <i>Methodology Statement - Working Near Busby's Bore</i> (INSW, 2018), vibration monitoring devices will be installed within the shafts of Busby's Bore in a location agreed by the project archaeologist, structural engineer, and acoustic consultant. The approved CNVMP will be updated to include:</p>  |

| Issue Raised   | Applicant Response   |
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|  | <ul style="list-style-type: none"> <li>• a requirement to consider the location of physical access shafts / points to Busby's Bore when determining the vibration monitoring location(s);</li> <li>• a requirement to consider vibration intensive construction activities in addition to those undertaken to construct the main stadium; and</li> <li>• revised vibration monitoring locations and any other specific measures to be implemented as part of the works following consideration of the above.</li> </ul> <p>The current wording of the <i>Methodology Statement</i> is considered appropriate for the construction of the Precinct Village and Car Park and no update is considered necessary to specifically address potential vibration impacts.</p> <p>In response to HNSW's commentary regarding construction generated vibration, Arup has advised that the above updates and implementation of the CNVMP will satisfactorily mitigate and manage vibration impacts, particularly where an exceedance is observed. Vibration monitoring will be used to indicate structural damage risks on Busby's Bore irrespective of the location of works.</p> <p>The operation of the Car Park is not anticipated generate significant vibration intensive activities and accordingly operational vibration impacts are not considered to be an issue.</p> |
| <p>The HIS assesses that (the fabric of) Busby's Bore would not be impacted by the proposal and that "if the spur or shafts are unexpectedly found to be within the study area redesign would be required" (p. v, 59). It is unclear to HNSW how feasible redesign is considered for the development at this stage. The HIS further states that "detailed construction and excavation plans are not yet to hand" (p. 47). This is a circumstance that could result in unanticipated impacts to Busby's Bore and/or the heritage curtilage.</p> | <p>Artefact's response that if the location of the Busby's Bore spur remains unclear then a number of scenarios for responding to the unexpected discovery of the spur during construction would be considered in the CHMP and the ARDEM.</p> <p>The updated Heritage Impact Assessment further clarifies this approach informed by the available information.</p>   |
| <p><i>Recommendation to DPIE</i></p> <p>Given that the potential impacts to Busby's Bore have not been fully assessed to date, HNSW does not support the modification at this time. HNSW may provide additional advice or recommend conditions once this information is received.</p>  | <p>Noted. Venues NSW understands the DPIE may refer this Response to Submissions Report to HNSW for review and comment. Venues NSW and its heritage consultant would be pleased to meet with HNSW to expand on any of the responses above, if required.</p>  |
| <p><b>Historical Archaeology</b></p>   |  |
| <p>The HIS assesses that the highest potential for archaeological survival on site is Busby's Bore and associated evidence (Phase 2), such as vertical access shafts and mining activity etc (Sections 6.2, 6.5). This HIS discusses that there is a low likelihood for other surviving archaeological evidence, particularly given the bulk excavations carried out on site during the demolition of the Sydney Sports Ground in 1986 (i.e. Section 7.2.1). HNSW considers the assessment of archaeological potential as reasonable.</p>      | <p>Noted.</p>  |
| <p>The Significance of Busby's Bore has been confirmed through its State Heritage Register listing under the Heritage Act 1977. It is not in question.</p>   | <p>Noted.</p>  |

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| <p>The HIS recommends that excavation works within the vicinity of Busby’s Bore and its shafts be subject to archaeological monitoring “...by an appropriately qualified archaeologist under the supervision of an accredited excavation director” (p. v, 5, 58). HNSW supports this approach and recommends that it is stipulated that any works within the curtilage of Busby’s Bore are subject to archaeological management. Further, any archaeological program on site should be underpinned by an Archaeological Research Design and Excavation Methodology (ARDEM).</p>  | <p>Noted. Conditions B39, B41, B43, B44, B45 and B46 collectively establish the processes, archiving, management and reporting requirements to ensure excavation works are undertaken by an appropriately qualified archaeologist under the supervision of an accredited excavation director and are appropriately managed. Condition B43 specifically requires any excavation works to be undertaken in accordance with the recommendations of the Archaeological Research Design and Excavation Methodology (Curio Projects, May 2019) and as updated the CHMP required by Condition B39.</p> <p>There are accordingly sufficient mechanisms built into SSD 9835 to address HNSW’s comments.</p>  |
| <p>The assessment of archaeological impact will require updating once the development construction works are finalised.</p>  | <p>Venues NSW does not object to the imposition of a suitably worded condition of consent to address HNSW’s comments.</p>   |
| <p><b>Built Heritage</b></p>   |   |
| <p>It is noted that there will be some visual impact on the adjacent SHR items which is considered acceptable.</p>   | <p>Noted, every endeavour has been made to appropriately integrate the project into its surrounds including with respect to the existing buildings, stadium, and landscaped edge to Moore Park.</p>   |
| <p>As the site contains several local heritage items, and other local items are in the vicinity, advice should be sought from the relevant local council.</p>  | <p>The City of Sydney’s comments in relation to heritage are addressed below.</p>   |
| <p><b>City of Sydney Council</b></p>   |   |
| <p><b>Transport and Traffic Impacts</b></p>  |   |
| <p>The City has reviewed the ‘Transport Assessment’ prepared by JMT Consulting, dated 14 October 2021 and has undertaken a detailed assessment of the potential transport and traffic impacts resulting from the proposed modification.</p> <p>The key consideration from a transport perspective is the proposed 1,500 space multilevel carpark and the impacts that this will have on the surrounding street network and transport system, which is a 960-space increase to the 540 existing approved spaces.</p> <p>The proposed 1,500 space carpark is justified by the applicant on the basis it will facilitate the removal of on-grass car parking in the precinct. The on-grass carparking areas are currently used for events only, with EP2 available when attendance is over 25,000 patrons and EP3 available when attendance is over 10,000 patrons.</p> <p>In contrast, the proposed carpark would operate 24/7. The City is therefore seriously concerned that this would generate increased traffic and congestion on local roads around the stadia more frequently than on major events days and at times where ongrass event parking does not often operate (e.g. weekday PM peak).</p> | <p>JMT Consulting has prepared a supplementary traffic statement (<b>Appendix E</b>) which considers the operation of the road network in the vicinity of the site. This assessment has considered the increase in traffic movements generated by the proposal on a Thursday afternoon and Saturday lunchtime outside of events held in the Moore Park Precinct. The assessment has considered, at the request of Council, an unlikely scenario where 50% of the car parking spaces turn over within a single hour. Given the observed movement patterns of the nearby Entertainment Quarter it is unlikely that the Car Park will reach close to full occupancy outside of major events held at the SFS or the SCG.</p> <p>The updated modelling confirms, even in this very conservative scenario, that intersections in the vicinity of the site retain an acceptable level of service with no change to current conditions. This verifies the conclusion drawn by TfNSW in their review of the proposal that the modification will have a negligible impact on the surrounding state road network and TfNSW infrastructure.</p> |

| Issue Raised   | Applicant Response  |
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| <p>There is also concern about the lack of certainty and enforceability surrounding the removal of on-grass car parking at the Precinct within the terms of any consent applying to the applications made.</p> <p>The City has outlined gaps and flaws in the applicant's transport assessment that must be addressed and puts forward a case for less car parking as follows:</p>   |   |
| <p><i>Gaps and flaws in the applicant's transport assessment</i></p> <p>The following significant concerns and issues are raised with the submitted transport assessment that must be addressed:</p> <ul style="list-style-type: none"> <li>• The traffic assessments for both the original stadium SSD (prepared by ARUP) and Mod 7 (prepared by JMT Consulting) place a large reliance on the absolute largest, most infrequent events as having the biggest impact on the surrounding street and transport system. The assessments fail to take into consideration the impact of smaller, more regular events which may occur during peak traffic periods, both on weekends and Saturdays. The traffic report provides no assessment of the proposed carpark at full occupation during these peak periods.</li> <li>• The modelling for the Mod 7 assessment only includes the Moore Park Road/ Driver Avenue intersection. The modelling does not include the wider network that was included in the original stadium SSD traffic assessment.</li> <li>• The lack of clarity of future estimated event schedules, frequency and attendances has resulted in the assessment putting a greater emphasis on infrequent larger events, which does not reflect the frequency or attendances seen in the recent past.</li> <li>• There is a lack of certainty and enforceability surrounding removal of on-grass carparking at EP2 (1,000 spaces) proposed. There is also no clear commitment for the removal of EP3 (1,100 spaces) in this application. It is critical that there is certainty around the permanent and immediate removal of all on-grass car parking across Moore Park Precinct. This is discussed separately in further detail below.</li> <li>• The proposed future mode share for the stadium is unambitious and not fitting of a world class stadium in this location and given recent major investment in both public and active transport. The proposed mode share is lower than many other state capital stadiums around Australia and in unconvincing.</li> <li>• The Mod 7 modelling of the Moore Park Road/ Driver Avenue intersection appears to have been incorrectly modelled and may significantly underestimate the impact that the proposal has on the road network and vice versa.</li> <li>• It appears the signalised intersection has been modelled in isolation rather than modelling two sites including the traffic signals and the merge of the right turn into general traffic eastbound on Moore Park Road and connected as a network. If this modelling is incorrect, and it appears to be, consideration must be made to limiting the number of spaces available outside of stadium events.</li> </ul> | <p>In accordance with Council's feedback, updated traffic modelling has been undertaken by JMT Consulting which considers the unlikely scenario that 50% of the car parking spaces turn over within a single hour. The extent of the modelling has also been expanded to consider the following two intersections:</p> <ul style="list-style-type: none"> <li>• Driver Avenue / Lang Road</li> <li>• Driver Avenue / Moore Park Road</li> </ul> <p>These are the two key signalised intersections in the vicinity of the SFS and were modelled as part of the recently approved Stadium Fitness Facilities (SFF) project (SSD 9835 MOD 2). It is important to note that only the weekday PM peak hour was modelled as part of the SFF project rather than the Saturday lunchtime peak hour which has also been considered in the updated assessment that supports the currently proposed Modification Application.</p> <p>The traffic modelling approach and assumptions utilised in the assessment for the Precinct Village and Car Park project have been consistent with those utilised in the Stage 1 and 2 SSD DAs as well as relevant modification proposals (e.g. the Stadium Fitness Facilities). In each of these assessments the required merge for eastbound traffic on Moore Park Road has been considered in the modelling.</p> <p>The updated modelling confirms, even in this very conservative scenario, that intersections in the vicinity of the site retain an acceptable level of service with no change to current conditions. This verifies the conclusion drawn by TfNSW in its review of the proposal that the modification will have a negligible impact on the surrounding state road network and TfNSW infrastructure.</p> <p>As noted in the exhibited Transport Assessment (JMT Consulting, October 2021) it is intended that all car parking in EP3 will be removed by Greater Sydney Parklands once both stages of the Precinct Village and Car Park are operational and pending the successful development and implementation of precinct-wide transport plans.</p> <p>The mode share noted in the exhibited Transport Assessment relates to travel to events held within the Precinct Village public domain rather than the SFS itself. The 30% car driver mode share represents a conservative assumption that has been adopted in order to ensure a robust traffic assessment of surrounding intersections was undertaken. This figure does not represent a target mode share, with the Transport Assessment detailing number of measures to promote travel via sustainable modes to the site. It is noted</p> |

| Issue Raised   | Applicant Response   |
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| <ul style="list-style-type: none"> <li>New and accurate modelling needs to be provided to show the true impact of the stadium, carpark and new land uses. This should include as a minimum a scenario where the car park is either filled or emptied (e.g. 50% of the capacity per hour) during a peak weekday pm peak, and a Saturday lunchtime peak.</li> </ul>  | <p>TfNSW has recommended the development of an updated Green Travel Plan as a Condition of Consent which will document further measures to promote travel to the site via public and active transport. Venues NSW raises no object to a suitably worded condition being imposed requiring the update of the Green Travel Plan as recommended by TNSW.</p>  |
| <p><i>Removal of on grass car parking</i></p> <p>The removal of on-grass parking has been a long-term community expectation and its ongoing operation prevents restoration of this critical community public space asset.</p> <p>The submitted documents outline that the proposal will facilitate removal of 2,100 existing on-grass car parking spaces in total, as follows:</p> <ul style="list-style-type: none"> <li>The modification will facilitate the immediate removal of the northern portion of the EP2 (Upper Kippax) on-grass parking area.</li> <li>The modification will also facilitate the removal of the southern portion of the EP2 (Lower Kippax) on-grass parking area prior to the commencement of operation of Stage 2 of the Precinct Village and Car Park.</li> <li>Parking on EP3 (1,100 spaces) will be progressively removed by Greater Sydney Parklands in consultation with the proponent and various other stakeholders, with the view of removing all on-grass car parking in Moore Park once the Precinct Village and Car Park is operational.</li> </ul> <p>The applicant proposes the inclusion of an additional condition of consent (condition A57) as a mechanism to secure removal of on-grass car parking. This proposed condition is outlined below:</p> <p><i>Condition A57</i></p> <p>(a) <i>On-grass event car parking associated with the use of the stadium within Event Parking 2 (EP2) Upper Kippax must cease immediately.</i></p> <p>(b) <i>On-grass event car parking associated with the use of the stadium within EP2 Lower Kippax must cease prior to the commencement of operation of Stage 2 of the Precinct Village and Car Park.</i></p> <p>The City supports the overall objective of removing all existing on-grass car parking in the Moore Park precinct (2,100 total spaces) as soon as possible. However, there is a general lack of certainty around whether this will actually be implemented and if it will be enforceable without additional legislated means. The following issues are raised:</p> | <ul style="list-style-type: none"> <li>The proposed condition of consent places the requirement on the stadium to cease using the identified on-grass carparking, ensuring that the SFS which is the subject of this consent does not utilise this parking.</li> <li>EP3 (Showground) will be progressively removed by the Greater Sydney Parklands in consultation with Venues NSW, Transport for NSW and the Moore Park Events Operations Group pending the carpark development becoming operational and successful implementation of precinct-wide transport plans (such as the Moore Park Traffic and Transport Management Plan) to reduce congestion in the precinct. The Moore Park Event Operations Group (MEOG) is chaired and coordinated by the NSW Department of Premier and Cabinet and is charged with developing the operational plans to ensure safe and successful events in the Moore Park sporting and entertainment Precinct and provides a forum for member agencies to work with event organisers on the effective traffic and parking operations in the precinct and its surrounds. MEOG member agencies include the State Rail Authority (STA), Transport for NSW, NSW Police, Venues NSW, the City of Sydney, the NSW Taxi Council, the Bus and Coach Association, the Entertainment Quarter and Playbill Venues, ensuring that the transport and planning outcomes for the operation of the precinct needs to coordinate across a range of agencies and stakeholders, and are not implemented by one agency.</li> <li>The event carparking available at Sydney Boys and Girls High School, Moore Park Golf Club and the Entertainment Quarter have been considered in the overall parking provision, and as detailed in the Transport Assessment prepared by JMT Consulting and exhibited as Appendix D of the Modification Application, with consideration of these areas the proposal does not increase the total car parking capacity in the precinct. This application seeks to relocate the car parking from EP2 within the development resulting in a minor decrease at the completion of Stage 2 of approximately 1,140 spaces during events. The Modification Application will also enable EP3 (Showground) to be progressively removed by Greater Sydney Parklands pending successful implementation of precinct-wide operational transport plans, with the view of removing all on-grass car parking in Moore Park once the Precinct Village and Car Park is operational to reduce congestion within the precinct.</li> <li>The exhibited Modification Application was reviewed by Venues NSW’s legal team prior to submission. Proposed Condition A57 was drafted by the legal team and intentionally does not make reference to EP3 as removal of on grass parking on EP3 is the responsibility of Greater Sydney Parklands and subject to successful implementation of precinct-wide operational transport plans.</li> </ul> |

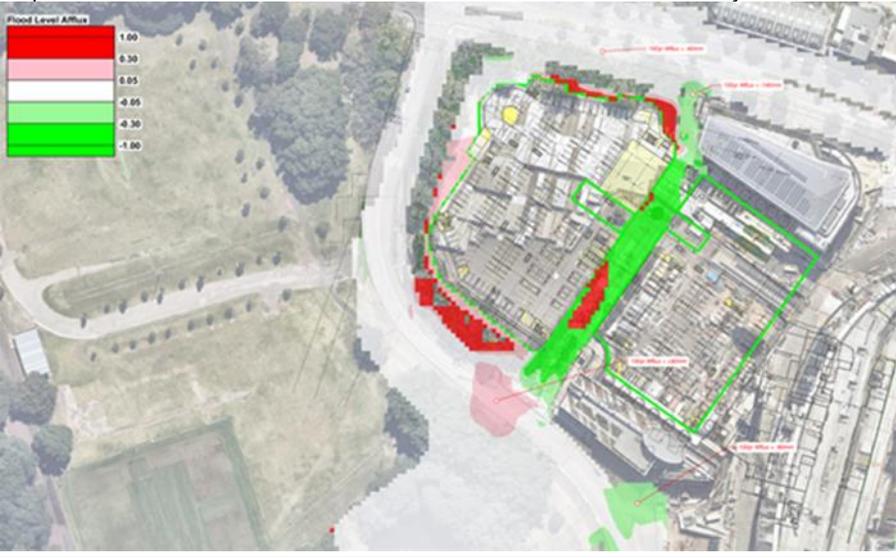
| Issue Raised  | Applicant Response  |
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| <ul style="list-style-type: none"> <li>It is unclear whether a condition can be imposed that relates to land that is outside of the site subject to the SSD. This means that whilst the condition may be imposed, it may not be enforceable.</li> <li>The proposed condition of consent does not make any reference to EP3, which currently contains 1,100 on-grass car parking spaces on event days. Therefore, there is a lack of strong intent or timeframe on the removal of on-grass parking in this location. The application puts the responsibility on the Greater Sydney Parklands, in agreement with other stakeholders, to remove this parking, pending the implementation of the overall Moore Park Master Plan 2040. The lack of certainty or timing around this is a major concern and unacceptable to the City.</li> <li>It is noted that there is no proposal to remove access to the other off-site car parking in the precinct that is currently available on event days including at Sydney Girls and Sydney Boys High Schools, Moore Park Golf Club and in the EQ car park.</li> </ul>  | <ul style="list-style-type: none"> <li>The City's suggestion that the Modification Application should also seek to remove access to the other off-site car parking on event days including at Sydney Girls and Sydney Boys High Schools, Moore Park Golf Club and in the EQ car park is directly contradictory to Condition D50 Event Car Management Plan (originally recommended by TNSW) which requires consideration of alternative strategies to parking through the exploration of satellite parking at these locations (among others).</li> </ul>   |
| <p><i>The City's case for less car parking</i></p> <p>The City has assessed the information submitted and concludes that the permanent and immediate removal of all on-grass parking and the construction of an additional 460 spaces (total 1,000 as opposed to the 1,500 proposed) would adequately meet the requirements of the stadium operation, without undue impacts on the surrounding street network and transport system, but only with the permanent and immediate removal of all on-grass parking (2,100 spaces).</p> <p>Events at the stadium are broken down in the application into 4 categories, with the following maximum capacity:</p> <ul style="list-style-type: none"> <li>Half full events (22,500 people)</li> <li>Full events (45,000 people)</li> <li>Concerts (55,000 people)</li> <li>Double headers (95,000 people)</li> </ul> <p>During 2018, the last year the stadium was in full operation before demolition commenced in early 2019, there were 2 double header events. The stadium approval also limits concerts to an average of 4 a year over 5 years, and a maximum of 6 in any one year.</p> <p>The City and South East Light Rail EIS summarised the frequency and attendance of events in 2011 and showed the majority of events at the stadium operate in a half full event mode. The ARUP modelling for the original stadium SSD assumed a modal share of drivers/passengers of 46% for half full events.</p> <p>This would require approximately 3,850 car parking spaces. This can be achieved by use of the EQ car park, Sydney Boys and Girls high school parking, the Golf Club parking and a new 1,000 space basement car park, and no on-grass parking.</p> | <p>The Precinct Village and Car Park project will facilitate the immediate removal of the northern portion of the EP2 (Upper Kippax) upon approval of MOD 7, with the removal of the southern portion of the EP2 (Lower Kippax) on-grass parking area prior to the commencement of operation of Stage 2 of the Precinct Village and Car Park. The development will also enable on-grass parking in EP3 (Showground) to be progressively removed by Greater Sydney Parklands in consultation with Venues NSW, TfNSW and the MEOG pending the successful development and implementation of precinct-wide transport plans. This will ultimately result in a net reduction of 1,140 event day parking spaces compared with the current project approval – a significant reduction which is in line with TNSW's objective to reduce car parking in the Precinct.</p> <p>The availability of parking is considered critical to the successful operation of the new SFS and underpins the attractiveness of the venue for patrons and event organisers. Maintaining an appropriate level of event day parking (irrespective of event size) is essential to ensuring accessibility and equity for vulnerable and disadvantaged visitors. A significant number of patrons travel to the SFS from Greater Sydney and beyond, where utilisation of public transport in the late evening after the conclusion of events to travel long distances is not feasible for most people.</p> <p>The significant investment by the NSW Government to develop a world class rectangular stadium in Moore Park will inevitably draw greater attendance numbers and more premium content when compared to the previous, outdated facility. This has been seen with the recent opening of CommBank (Western Sydney) Stadium in Parramatta where attendance numbers increased significantly compared with the previous Parramatta Stadium. Relying on data from 2011 is not considered to provide a fair representation of the likely attendance numbers for the newly developed facility. The level of car parking proposed will meet the needs of patrons to the SFS and limit the occasions where parking spills over into local residential streets.</p> |

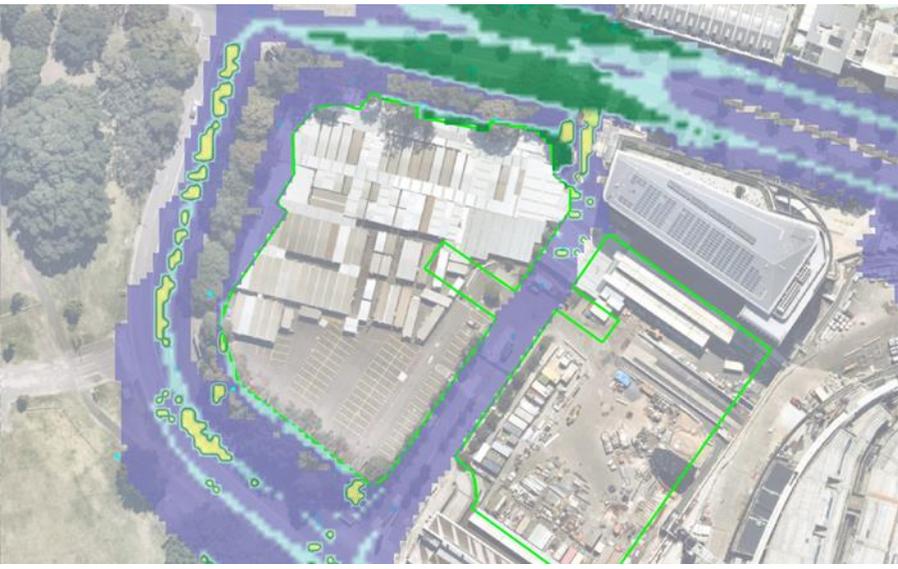
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| <p>The applicant’s target mode share of driver/passenger is similar to 2018 levels. The City is of the view that it should be lower to reflect current TfNSW policies and to better reflect the large investment in both active and public transport (light rail) connecting people to the stadium.</p> <p>The City requests the opportunity to discuss this case for less parking further with DPIE and the applicant.</p>   | <p>Satellite parking, while an important aspect of the overall transport strategy, cannot be relied on as heavily as suggested by the City of Sydney Council for the reasons outlined above. Moreover, the Event Car Parking Management Plan required under Condition D50 and currently under preparation in consultation with TNSW has explored satellite parking locations and confirmed that only Randwick Racecourse and UNSW are appropriate locations that can accommodate the quantum of parking required for large scale events at the SFS.</p> <p>The proposed level of car parking is therefore considered to provide an appropriate balance between meeting the needs of patrons dependent on car travel to the SFS as well as promoting public and active transport modes.</p>   |
| <b>Heritage</b>   |  |
| <p>A spur of Busby’s Bore, listed on the State Heritage Register, Sydney Water s170 Heritage Register and the Sydney LEP 2012, traverses part of the site. Historical plans indicate that there may also be one or two shafts to the bore on the site.</p> <p>The proposed carpark entails bulk excavation of large quantities of soil from the study area and has the potential to impact archaeological remains. Such excavation is proposed within the 3m curtilage of the bore.</p> <p>The Heritage Impact Statement prepared by Artefact, dated September 2021, provides recommendations to avoid direct and vibrational impacts to Busby’s Bore and its shafts. It is important that these recommendations (in Section 8.2(4) of the report) relating to the preparation of a Construction Heritage Management Plan and Construction Noise and Vibration Management Sub-Plan are imposed as conditions of consent. The views of Heritage NSW should also be sought in relation to this matter.</p>  | <p>The exhibited Heritage Impact Assessment (Artefact, September 2021) concluded the proposed Precinct Village and Car Park could be supported, subject to implementation of the recommendations. As outlined above and specifically in response to feedback received from HNSW, the Precinct Village and Car Park is not expected to impact on Busby’s Bore and its spurs.</p> <p>The updates required to be made to the CHMP, <i>Methodology Statement – Working Near Busby’s Bore</i> and CNVMP, combined with the ongoing requirements to comply with Conditions B39, B41, B43, B44, B45 and B46 relating to the processing, archiving, management and reporting of excavation works will ensure the impacts to the sit’s heritage values are minimised and appropriately mitigated.</p>   |
| <b>Urban Design</b>   |  |
| <p>The proposed public domain aspects result in a positive contribution to the urban fabric. However, the quantum of proposed additional parking is contributing to the following impacts:</p> <ul style="list-style-type: none"> <li>• The park is on a slope, elevated up to 2 storeys above Driver Avenue and approximately one storey above Moore Park Road. The elevation of the park is due to the parking structure being located under the park. The slope of the park reduces the area of useable and level public space and creates the need for stairs and a long ramp.</li> <li>• Limited equitable access, with the ramp being located at the corner of Moore Park Road and Driver Avenue which is the furthest corner from the light rail station.</li> <li>• Loss of existing trees.</li> </ul> <p>Reducing the number of proposed car parking spaces would minimise the above impacts and provide public open space that is more contiguous with the levels of the surrounding public domain and therefore more accessible to everyone.</p> | <p>Noted, the Precinct Village and Car Park will contribute to the public domain and urban design through replacing an existing and approved at-grade parking area with new open space, retail, and fitness facilities. The proposal represents a positive addition to this sports and entertainment precinct.</p> <p>The park has been designed with consideration of the slope of the site, and has delicately responded to the required levels. This provides the opportunity for amphitheatre style seating and timber plinths to encourage informal seating and eating opportunities whilst retaining a more intimate scale and privacy.</p> <p>The ramp into the Precinct Village is a key gateway into the site for wayfinding and place making, and is identified as an opportunity to integrate art and feature lighting. The proposal has been reviewed by Before Compliance confirming that the e Precinct Village and Car Park can comply with the 2010 Disability (Access to Premises–Buildings) Standards and the National Construction Code Deemed-to-Satisfy Provisions.</p> |

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|  | <p>Tree removal and replacement has also been further refined in this Submissions Report. While the proposal necessitates the removal of 45 trees (including 2 already approved for removal), 43 trees (including one tree previously proposed for removal) will be retained on the site and a significant 110 trees will be planted as part of the Modification Application, including advanced size (100L) trees at the completion of the Stage 2 works. This will ensure that the proposal continues to achieve and exceed the tree replacement target conditioned under the Concept Proposal and Stage 1 DA (SSD-9249) and that the Precinct Village and Carpark will reinstate the existing landscaped streetscape that is recognised as being a positive attribute of the existing MP1 carpark.</p>   |
| <p><b>Public Domain</b></p> <p>The City’s public domain on Moore Park Road and the public footpath on Driver Avenue have not been addressed in the application. Given the design focuses on leading pedestrians through the site from the public domain on all street frontages to the stadium, terraces and decks facing out to the public domain, these areas should be considered as part of the works.</p> <p>The finishes of the public domain and public footpaths should complement the treatments proposed inside the site boundary and ensure safe and equitable access to the site.</p> <p>The current consent has conditions relating to the public domain that must be addressed as part of this modification.</p>   | <p>In accordance with this recommendation, it is confirmed that Condition B13 of the consent will apply to the Precinct Village and Carpark. This condition requires consultation with Council and demonstrating that the public domain design and treatment meets the requirements of Council prior to commencing any footpath or external public domain works.</p>  |
| <p><b>Tree Management</b></p> <p>The City supports the following tree removals:</p> <ul style="list-style-type: none"> <li>• The 29 ‘consider for removal’ trees are predominantly located along the eastern carpark driveway. These trees have a low landscape significance rating and will require removal for the basement footprint.</li> <li>• 2 ‘priority for removal’ trees are of poor health and structural condition. The removal of these trees is supported.</li> <li>• With sufficient replacement planting, the City supports the removal of these 31 trees.</li> </ul>  | <p>Venues NSW welcomes the City of Sydney’s support for the removal of the identified trees, noting that replacement planting will be provided throughout the precinct.</p>   |
| <p>However, the following issues are raised:</p> <ul style="list-style-type: none"> <li>• The removal of trees with a ‘priority/consider for retention’ value rating is not supported.</li> <li>• The new pedestrian entry on the corner of Moore Park Road and Driver Avenue must be redesigned using tree sensitive methods to retain trees 137 and 138, i.e., the pathway being on or above existing grade and utilising the current pedestrian entrance on Driver Avenue (approximately 10 metres from the new entrance).</li> <li>• The proposed basement and stairs must be setback to retain trees 137, 138, 147, 151, 195 and 303. Amendments to the internal carpark layout may allow for a reduction of the</li> </ul> | <p>The pedestrian entry path at the corner of Moore Park Road and Driver Avenue has been realigned to retain Tree 138 and will be constructed from a lightweight material to enable structural supports to be located around root locations (with root mapping to be undertaken). While alternate options for architectural and engineering design and construction management have been explored through this post-lodgement design development process, no other additional trees could be identified for retention. During resolution of the stormwater solution and construction staging access, further trees have been identified as being impacted or potentially impacted and are of moderate value and low value as detailed in the additional information at <b>Appendix H</b>. Updated Landscape Architecture drawings are provided at <b>Appendix C</b> which indicate the revised existing tree impacts and updated to replacement trees to account for these changes.</p> |

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| <p>basement footprint. The amended basement footprint must be based on non-destructive root investigations by an AQF Level 5 Arborist.</p> <ul style="list-style-type: none"> <li>Proposed piling rigging will require the removal of tree 187 and pruning of tree 184. It is recommended that the layout for the piling rig be amended to limit impacts to existing trees to be retained. The crane should be relocated further east where the current carpark drive is.</li> <li>The AIA has not provided a tree protection plan that shows the Tree Protection Zones (TPZ), Structural Root Zone (SRZ) and incursions within these zones.</li> <li>According to the AIA, a total of 89 replacement trees are proposed within the site. The Landscape Plans prepared by Aspect dated 2 September 2021 'Rev 1' are generally concept at 30% completion. Details of the proposed replacement planting e.g. number of tree species, planting conditions etc have not been provided.</li> <li>A detailed landscape plan, drawn to scale, by a qualified landscape architect or landscape designer should include: <ul style="list-style-type: none"> <li>Details of earthworks and soil depths including mounding and retaining walls and planter boxes (if applicable).</li> <li>Location, numbers, type and supply of plant species, with reference to the relevant Australian Standard;</li> <li>Details of planting procedure and maintenance;</li> <li>Details of drainage, waterproofing and watering systems.</li> </ul> </li> </ul> | <p>Detailed landscaping information as itemised will be included in the Public Domain Plan submission which is required as part of Condition B12 in line with the SSDA approval.</p> <p>Furthermore, the amended Landscape Plans prepared by Aspect at <b>Appendix C</b> identify the trees to be removed and replaced. The revised tree removal and replacement strategy has been developed in consultation with John Holland Group, TTW, Arup, Tree IQ and having regard to Sydney Water's submission advising that trees cannot be planted over the stormwater pipe.</p> <p>Following a holistic review of these factors and the City of Sydney's feedback in relation to trees, the Modification Application now proposes revisions to the tree removal and replacement proposal to:</p> <ul style="list-style-type: none"> <li>remove a total of 45 trees to facilitate the Precinct Village and Car Park, including construction of a temporary construction road and diversion of a stormwater pipe; and</li> <li>replace and undertake new planting of 110 trees.</li> </ul> <p>Tree IQ, the appointed Project Arborist, has reviewed the scheme and confirmed:</p> <ul style="list-style-type: none"> <li>Both Trees 137 and 138 cannot be salvaged given the grades required to achieve an accessible footpath at the site's entry on the corner of Moore park Road and Driver Avenue. Tree 138 is better specimen than Tree 137 and accordingly has been prioritised for retention.</li> <li>Trees 148, 151, 172, 181, 187, 190, 192, 193, 194, 246-11, 246-12 and 303 are proposed for removal due to the extent of pruning required, construction of the temporary driveway, the location of piling rigs and unavoidable encroachment of the basement structure and Sydney Water assets into root zones.</li> <li>Root mapping and investigations will be required for Trees 143, 171, 174, 183, 184, 304 and 305. It is expected that root growth within the existing carpark area from these trees will have been partially restricted by the existing kerb and the conditions under the asphaltic car park surface. Nonetheless, root investigations should be undertaken prior to construction commencing for the relevant stage to determine the number and volume of roots within the TPZ areas which will be impacted stormwater infrastructure</li> <li>Tree 151 has lost its terminal leader and is accordingly not worth retaining; and</li> <li>Tree 195 is a much smaller specimen and is a suitable specimen for removal.</li> </ul> |
| <p>In addition to the above, the City makes the following recommendations:</p> <ul style="list-style-type: none"> <li>All tree pruning must be undertaken in accordance with AS 4373 2007 Pruning of Amenity Trees by an AQF Level 3 Arborist.</li> </ul>   | <p>Condition B27 of SSD 9835 requires the preparation of Construction Biodiversity Management Sub-Plan (CBMSP) in consultation with the project arborist and a suitably qualified ecologist. A CBMSP has been approved by the certifying authority in accordance with the requirements of SSD 9835 and is publicly available on the project</p>  |

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| <ul style="list-style-type: none"> <li>All street trees surrounding the site on Council owned land must be retained and protected in accordance with AS4970-2009 Protection of Trees on Development Sites. The protection and retention of all existing street is a priority for the City and the trees are long term assets that the community highly values. The proposed development and associated landscaping in the vicinity of trees including street trees has a high potential to impact in their health and structure. The City of Sydney Street Tree Master Plan includes general street tree protection measures and conditions that must be followed. See Section 8 of the below document:<br/><a href="http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0010/130240/STMP2011_150501-PartD.PDF">http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0010/130240/STMP2011_150501-PartD.PDF</a></li> <li>All trees to be retained within the site must be protected in accordance with AS4970-2009 Protection of Trees on Development Sites, and as specified in the Arboricultural Impact Assessment (AIA) prepared by TreeIQ dated 6 September 2021 'Revision A'. A Project Arborist must be engaged to assist with tree management advice during the various stages of the design and construction process. The Project Arborist should be qualified in arboriculture to Australian Qualifications Framework (AQF) level 5 or above and have at least 5 years demonstrated experience in managing trees within complex development sites.</li> <li>Tree sensitive methods as outlined within Section 3.4 of the AIA must be used within TPZ areas to minimise adverse impacts. Existing ground levels must be maintained, and all new structures must be designed to accommodate the trees to be retained.</li> <li>Newly planted trees must meet Australian Standard 2303: Tree Stock for Landscape Use (2015).</li> <li>Loss of existing tree canopy should be offset by replacement tree plantings that will attain a comparable size at maturity e.g. a large tree should be replaced with a tree species that will grow to a similar size.</li> </ul> | <p>website at: <a href="https://www.infrastructure.nsw.gov.au/media/2824/construction-biodiversity-management-sub-plan.pdf">https://www.infrastructure.nsw.gov.au/media/2824/construction-biodiversity-management-sub-plan.pdf</a></p> <p>Condition C23 of SSD 9835 requires tree protection for the duration of the construction works in accordance with the approved CBMSP.</p> <p>The approved CBMSP satisfies the City of Sydney's recommendations, including:</p> <ul style="list-style-type: none"> <li>ongoing management advice from the appointed project arborist to assist with tree management during the various stages of the design and construction process (note: Anna Hopwood from Tree IQ is the appointed Project Arborist and is well credentialed having been accredited under the Australian Qualifications Framework (AQF) level 5 and has 5+ years demonstrated experience in managing trees within complex development sites)</li> <li>the carrying out of all tree pruning in accordance with AS 4373 2007 Pruning of Amenity Trees by an AQF Level 3 Arborist (and as required by Schedule 8 of the Sydney Development Control Plan 2012)</li> <li>the implementation of tree protection zones (TPZ) in accordance with AS4970 -2009</li> <li>retention and protection of all identified trees in accordance with AS4970-2009 Protection of Trees on Development Sites.</li> </ul> <p>Condition A55 requires the updating of all relevant plans/strategies following the approval of any modification. Following the approval of MOD 7, the CBMSP will be updated to reflect the following recommendations made by the City of Sydney:</p> <ul style="list-style-type: none"> <li>implementation of tree sensitive methodologies as outlined within Section 3.4 of the approved Arboricultural Impact Assessment (AIA) (TreeIQ, September 2021), including maintenance of existing ground levels and design of new structures to accommodate retained trees to accommodate the trees to be retained</li> <li>a commitment that newly planted trees will meet Australian Standard 2303: Tree Stock for Landscape Use (2015)</li> <li>all street trees surrounding the site on Council owned land are retained and protected in accordance with AS4970-2009 Protection of Trees on Development Sites and the City of Sydney Street Tree Master Plan</li> </ul> <p>The loss of existing tree canopy will be offset by replacement tree plantings that will attain a comparable size at maturity as evidenced by the exhibited Landscape Plans (Aspect, October 2021) and updated in the revised plans at <b>Appendix C</b>. Due to limited access to deep soil, there is a balancing of locating replacement trees within planters on slab and in deep soil areas. Larger varieties of replacement tree will be concentrated in the available zones of deep soil and will contribute to the existing canopy</p> <p>There are, accordingly, sufficient mechanisms within SSD 9835 to address the City of Sydney's comments.</p> |

| Issue Raised   | Applicant Response   |
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| <p><b>Landscape</b></p> <p><i>Western carpark design and excavation impacts on existing trees</i></p> <p>Unlike the eastern carpark, which is naturally ventilated, design of the western carpark is 5 basement levels that relies on mechanical ventilation.</p> <p>The plans indicate a number of engineer plant rooms at the edge of the western carpark that impact on existing trees and deep soil. It is requested that the applicant:</p> <ul style="list-style-type: none"> <li>• Confirm the design and purpose of each mechanical plant room; and</li> <li>• Demonstrate options to locate mechanical plant and stairs clear of existing trees of significance T147, 148, T187, T308.</li> </ul> | <p>As detailed in the addendum Arboricultural Impact Assessment at <b>Appendix H</b>, alternate options were considered during the post-lodgement design development process for tree retention. The project will necessitate the removal of forty-five (45) trees, including six (6) additional trees that will be removed from the construction of the internal access road and two (2) additional trees from the detailed design of the stormwater network. Forty-three (43) trees will be retained on the site, including one (1) that was previously proposed to be removed (Tree 138) as part of this Modification Application. A total of 110 additional replacement trees will be planted as part of the Precinct Village and Carpark, including advanced size (100L) trees at the completion of the Stage 2 works. The project as modified remains compliant with, and exceeding, the Concept Proposal and Stage 1 DA (SSD-9249) commitments to provide 1.5 replacement trees for every tree removed on the site.</p> |
| <p><i>Stormwater</i></p> <p>Overland flow and localised flooding in 1 in 100 year storms are an issue on the northern edge of western car park basement. Storm water is to be channelled around the site.</p> <p>Architect section L (dwg A42.00.20 [B]) shows a stormwater culvert at the edge of the carpark located over the top of carpark plenums. It is queried whether stormwater and air intake can be mingled and clarification on this is requested.</p>   | <p>The afflux for the 100 year event shows the changes to the overland flow on the western side of the stage 2 development are localised, further development of the design with respect to the mechanical risers and the stormwater diversion is underway.</p>    |
|  | <p>The hazard in the 100 year solution for the western side remains H1 which is acceptable.</p>  |

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| <p><i>Wind</i></p> <p>The Eastern edge of the Rugby Australia building shows a wind screen to mitigate wind gusts (see Figure 2 below). The location will impact on new trees previously approved in SSD 9835 (See Figure 3).</p> <p>Clarification is requested as to whether a wind study has been prepared and the rationale behind providing this screen. It is requested that the applicant submit design details to confirm impacts and wind screen design.</p> | <p>The wind screen identified in the City of Sydney’s submission does not form part of the works proposed by MOD 7 as it is outside the land to which MOD 7 applies.</p> <p>By way of background, the wind screen in question was recommended during the initial assessment of SSD 9835 to protect against winds traversing the western boundary of the SFS concourse. Being a large piece of infrastructure - 65m long, 2m high, and at least 70% solid - the detailed design phase identified the opportunity to design the wind screen as public art. The approved Public Art Plan and subsequent commissioning indicates the screen will be designed to accommodate arboreal images of <i>Xanthorrhoea arborea</i> (grass tree) of contrasting degrees of translucency and opacity.</p> <p>The Public Domain Plan submitted pursuant to Condition B20 and approved by the Planning Secretary locates the wind screen on the technical drawings and demonstrates that only two (2) trees require removal. SSD 9835 as originally approved permits the removal of the two affected trees. The approved Public Domain Plan is available on the project website at: <a href="https://www.infrastructure.nsw.gov.au/media/3170/sfs-public-domain-plan.pdf">https://www.infrastructure.nsw.gov.au/media/3170/sfs-public-domain-plan.pdf</a></p> |
| <p><i>Issues with architectural plans and sections</i></p> <p>The following issues need to be addressed in the plans:</p>  | <p>The amended Landscape Plans prepared by Aspect at <b>Appendix C</b> identify the trees to be removed and replaced. The revised tree removal and replacement strategy has been developed in consultation with John Holland Group, TTW, Arup, Tree IQ and having regard to Sydney Water’s submission advising that trees cannot be planted over the stormwater pipe.</p>   |

| Issue Raised  | Applicant Response   |
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| <ul style="list-style-type: none"> <li>• Confirm the change in the existing approval for the stadium, which had trees at the edge of the concourse between Carpark MP1. Clarification is required around how many trees are retained and removed.</li> <li>• Sections E-F and H-J (dwg A42.200.25 [B]) are not shown in plan (dwg 13.L.1.03 [F]). An updated plan confirming the location is required. These sections show level 0 carpark with new trees over 8m tall growing out of concrete between pedestrian bridges above on plaza level. The section is incomplete and does not demonstrate a slab set down with integral tree pits or use of upturned waffle slab with sufficient depth and soil volume to support the heathy growth of trees.</li> <li>• Confirm that the design of tree planters within the ‘gully’ allows for minimum 1m soil depth and soil volume compliant with Sydney Landscape Code 2.</li> <li>• The photomontages indicate trees in planters east of the tennis courts in the flexible spectating zone. No trees are shown on the landscape plans.</li> </ul> | <p>Following a holistic review of these factors and the City of Sydney’s feedback in relation to trees, the Modification Application now proposes revisions to the tree removal and replacement proposal to:</p> <ul style="list-style-type: none"> <li>• remove a total of 45 trees to facilitate the Precinct Village and Car Park, including construction of a temporary construction road and diversion of a stormwater pipe; and</li> <li>• replace and undertake new planting of 110 trees.</li> </ul> <p>An addendum Arboricultural Impact Assessment has been prepared by Tree IQ and provided at Appendix H confirming that the proposal necessitates the removal of 45 trees (including 2 already approved for removal) and retention of 43 trees (including one tree previously proposed for removal). To address the required tree removal, and additional 110 trees will be planted as part of the Modification Application, including advanced size (100L) trees at the completion of the Stage 2 works.</p> <p>The project proposes replacement trees between the footprints of this project and the edge of the SFS built elements and concourse. A total of 6 trees are located along this edge in the deep soil area between the SFS and the Precinct Village and Carpark, which have been designed with consideration of the services and access bridges from SFS concourse.</p> <p>Overall, the Precinct Village and Carpark provides increased total tree numbers and a greater distribution of planting, when compared to the original approval for the stadium and the approved MP1 at grade carpark.</p> <p>Trees planted within the ‘gully’ roadway access area are facilitated by raised planters that will meet the minimum 1m soil depth.</p> <p>Given changes in existing tree impacts and available deep soil zones, the revised Landscape Architecture plans indicate trees accommodated east of the tennis courts within permanent perimeter planters along with the mobile planters as previously indicated within the photomontages. Mobile planters were indicated in previous landscape plans (code F1/F2/F3).</p> |
| <p><i>Landscape design</i></p> <p>The submitted Landscape Plans are 30% tender and are an incomplete package. They include levels and grading, select sections, materials and finishes, tree retention and removal plan only. The package must be updated to include the following:</p> <ul style="list-style-type: none"> <li>• Staging of east and west carparks</li> <li>• Details of the children’s nature play and water play area</li> <li>• Planting plans and details</li> <li>• Plant schedule, including new tree species (size, mature height, spread) and quantities</li> </ul>   | <p>Detailed landscaping information as itemised will be included in the Public Domain Plan submission which is required as part of condition B12 in line with original SSDA approval. Clarification has been provided within the revised landscape plans on the proposed staging approach in line with the architectural concept.</p> <p>Existing trees proposed for removal is 46 (this accounts for the revised numbers impacted due to evolution of engineering and construction management impacts). The additional trees impacted are numbers 172, 181, 183, 305, 193, 194, 246-11, 246-12. The design has been modified to retain Tree 138.</p>  |

| Issue Raised  | Applicant Response   |
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| <ul style="list-style-type: none"> <li>• Soil depth and volume for all new trees located on slab</li> <li>• Details for walls, and edges, furniture, play equipment, structures, ramps, stairs, steps, planters, carpark planters, lighting coded on Legend</li> <li>• Photomontage indicates trees in planters east of the tennis courts in the flexible spectating zone. Confirm the design of moveable planters allows for soil depth and volume with small shade trees.</li> <li>• Confirm lighting design does not contribute to light pollution and impact on fauna.</li> <li>• Clarification is requested around the proposed change in the number of existing trees for removal and new trees proposed, in line with the previously approved tree replacement ratio of 3:1.</li> </ul>  | <p>A total of 49 replacement trees are located within Stage 1 (east zone) and a total of 61 replacement trees are located within Stage 2 (west zone), providing overall 110 replacement trees.</p> <p>There are a further 3 trees which are subject to root mapping investigation. In the event that there are additional impacts on tree retention that are identified through this process there is a continued commitment to including additional replacement trees to provide quality canopy cover in line with exceedance that has currently been achieved relative to the Stage 1 Concept Plan approval.</p> <p>The Precinct Village and Car Park, therefore, remains compliant with and exceeds the tree replacement ratio of ratio of 1(tree lost):1.5 (trees replaced) specified in Condition C8 of the approved Concept Proposal and Stage 1 DA (SSD-9249).</p>  |
| <p><i>Green roofs</i></p> <p>The submitted photomontages indicate inaccessible green roofs to new buildings including the Precinct Village Retail Pavilions and Tennis Club Pavilion, which could be supported. However, green roofs are not part of the landscape package.</p> <p>It is noted that the City does not support the use of synthetic turf surface on roofs. This is due to the artificial nature, heat gain, lack of biophilic and biodiversity outcomes and likelihood of ending up in landfill in the future. It is requested that the applicant:</p> <ul style="list-style-type: none"> <li>• Confirm green roof design (intensive or extensive), overall soil depth, drainage design, and plant species with rate/sqm.</li> <li>• Submit an outline strategy of how the inaccessible green roofs will be safely accessed and maintained.</li> </ul> | <p>As detailed in the amended Architectural Plans and Landscape Plans at <b>Appendices B and C</b>, the green edge on the roof has been replaced with pebbles installed in a visually interesting, artistic pattern. Accordingly, regular access to the roof following construction will not be required.</p>  |
| <p><b>Sustainability</b></p>  |  |
| <p><i>Proposed parking spaces and sustainability</i></p> <p>Currently, on-grass parking is only used for events, whereas the proposed car park will be used 24/7. It is unclear why the proposed intensification of carparking is deemed a feasible and sustainable outcome if the project seeks to obtain LEED v4 certified Gold rated sustainable precinct targets. The design report notes:</p> <p>“LEED v4 certified Gold rating which is deemed ‘Australian Best Practice’. Sustainable design principles have been established in the Environmentally Sustainable Design Strategy by LCI Consultants under categories outlined within the LEED v4 rating system. These categories include Location and Transport, Sustainable Sites, Water Efficiency, Materials and Resource, Energy, Social Sustainability.”</p>  | <ul style="list-style-type: none"> <li>• The project team remain committed to delivering a Gold LEED rating across the precinct, in accordance with the commitments of the Concept Proposal and Stage 1 DA (SSD-9249), and as was achieved at both the International Convention Centre in Sydney and the Western Sydney Stadium. The proposed initiatives to achieve this pathway are outlined in LCI’s ESD report exhibited as Appendix J of the Modification Application.</li> <li>• The Precinct Village and Car Park project is a keystone to the strategy for removing on-grass car parking within Moore Park. The Modification Application will facilitate the removal of the EP2 (Upper and Lower Kippax) on-grass parking area within Moore Park opposite the MP1 Car Park, and therefore, does not increase the total car parking capacity in the precinct, but rather relocates the car parking from EP2 within the development resulting in a minor decrease at the completion of Stage 2 of approximately 1,140 spaces during events.</li> </ul> |

| Issue Raised  | Applicant Response  |
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| <p>It is requested that the following points be addressed by the applicant from a sustainability perspective:</p> <ul style="list-style-type: none"> <li>• Car parking numbers should be reduced (as per the City’s recommendations under Point 1.2 of this letter) to allow the western carpark to be naturally ventilated like the eastern carpark and limit excavation extent and plant rooms required for mechanical ventilation that impact existing trees.</li> <li>• Consideration should be made as to whether there is space in the western carpark design of aisles and spaces that could be minimised to make a more compact footprint and pull the basement back from Moore Park and Driver Avenue existing trees.</li> </ul>   | <ul style="list-style-type: none"> <li>• Further, the proposed parking provision of up to 1,500 spaces as part of the Precinct Village and Car Park is considerably less than the LEED requirements which requires a 90% reduction on baseline of 0.33 cars per seat (which equates to 15,000 spaces), in recognition of the many public transport options and alternative ways of accessing the stadium.</li> </ul>  |
| <p><i>Facilitating electric vehicles</i></p> <p>The ESD report includes a commitment to allocating spatial capacity for electric vehicle supply equipment for 2% of all parking, which is a poor commitment and inconsistent with NSW government directions.</p> <p>The National Construction Code (NCC) is soon to introduce a requirement that new commercial development provide the basic infrastructure (cable stray space and meter board space for future upgrade) in new carparks for electric vehicle charging for 20% of spaces. By 2030, electric vehicles will represent a significantly greater proportion of the Australian car fleet. Any new parking facilities constructed for government managed or controlled facilities should have a much higher allocation of electric vehicle charging infrastructure. 50% or greater would be an appropriate target given this is a Government project.</p> | <p>As recognised, there is currently no NCC requirement for electric vehicle charging. The Electric Vehicle Council of Australia reported that 1.57% of new car sales were electric vehicles in 2021 and such the proposal to provide at least 2% of spaces as electric charging enabled (hardware provided) reflects the current market demand and uptake.</p> <p>Additional chargers can be easily added as required. The electrical connection point at the main switchboard can be sized to take many more chargers and can be isolated for works to occur without impacting the operation of the remainder of the facility. The design of vehicle chargers allows for remote monitoring and control by various providers (e.g. Chargefox, Jetcharge) so that demand is managed to avoid overconsumption.</p> |
| <p><i>Green vehicle preference</i></p> <p>The ESD report specifies “commitment to allocating spatial capacity for green vehicle preference for 5% of all parking by the project.” Clarification is requested as to what is meant by ‘green vehicles’ and how this is to be defined and controlled in practice.</p>  | <p>As part of the commitment to the LEED Gold rating, 5% of parking spaces that are nearest the lifts and entry points will be signposted and line-marked for green vehicles, being those that achieve a minimum green score of 45 by the American Council for an Energy Efficient Economy (ACEEE) in the annual vehicle rating guide (or local equivalent for projects outside the U.S.). This local equivalent is likely to be based on Australia’s Green Vehicle Guide <a href="https://www.greenvehicleguide.gov.au">https://www.greenvehicleguide.gov.au</a> and will be confirmed at the rating certification stage. The operation will be similar to the way in which small car and parent parking signage is managed in most retail centres.</p>  |
| <p><i>Construction materials</i></p> <p>Page 14 and 31 of the ESD report reference the original stadium SSD. Clause (vi) of Condition B20 requires details of alternative construction materials to be submitted.</p> <p>There should be unequivocal commitment to use low embodied carbon concrete for all concrete construction elements for the carpark and public domain. The NSW Government is championing innovation in this space and should lead by example. Commercial products are available from largescale suppliers at no significant cost to the proponent. This may not need to be a commitment to geopolymers product but must be demonstrable 30-40% lower embodied carbon and there are commercial products on the market that meet this.</p>   | <p>Noted. As part of the LEED Gold rating a Life Cycle Analysis (LCA) is being carried out to calculate the environmental impact of key structural materials with the aim of reducing the global warming potential (i.e. Embodied Carbon) and some other environmental factors by at least 10% each.</p> <p>It is likely that to achieve this target, key concrete mixes will include at least 30% supplementary cementitious material (SCM) such as flyash. Other initiatives to deliver the savings include dematerialisation of items like brickwork and blockwork and the use of thinner slabs and columns through post tensioning and construction programming.</p>  |

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| <p><i>Lighting strategy</i></p> <p>The Lighting Strategy has only brief reference to energy efficiency. While it is anticipated that all outdoor and carpark lighting will be LED technology, the light strategy should include a clear statement from the proponent about commitment to the most efficient lighting technologies, given that for carparking facilities lighting is usually a significant contributor to total energy use alongside fans/ ventilation.</p>   | <p>Car park lighting is a significant portion of the energy footprint for the Precinct Village and Carpark. As part of the LEED rating, a reduction of at least 16% is being targeted through the detailed design phase which can be achieved through lighting layout and controls including motion detection and the partial/staged operation of the facility on non-event days to save whole floors of energy consumption.</p>  |
| <p><b>Environmental Health</b></p> <p><i>Operational noise and vibration</i></p> <p>The Noise and Vibration Impact Assessment prepared by ARUP has been reviewed and the following points are made:</p> <ul style="list-style-type: none"> <li>• The location, type and size of building services plant that may emit noise to the surrounding environment will be the subject of further design development and indicative advice provided at this stage will be revised once the mechanical services design package is finalised.</li> <li>• A preliminary mechanical design has been developed which indicates that noise emissions will be well below the operational noise criteria at the nearest sensitive receivers and can be treated with acoustic attenuators to further mitigate noise. It is recommended that a condition be imposed to assess the potential mechanical plant noise impact prior to the issue of any Construction Certificate, in the form of a mechanical plant noise verification report.</li> <li>• Event noise will need to comply with noise levels set out in condition D48 of the original stadium consent, while non-event days need to comply with noise levels set out in condition E2.</li> <li>• Any music in relation to retail background music, live music or performances will require assessment as part of future retail fit-out Development Applications. Cumulative noise assessments will need to be completed to ensure compliance with the approved precinct noise levels.</li> <li>• Consent for any stand-alone events on non-event days that are not captured by Conditions A17 and the Event Management Plan of the original stadium consent will be subject to a separate future approval. This should be clearly conditioned.</li> </ul> | <p>Condition D48 of SSD 9835 requires the preparation of an Operational Noise Management Plan (ONMP) including the establishment of a protocol for determining compliance with the noise limits including at intermediate monitoring points for different event configurations and meteorological conditions. The ONMP, which is required to be submitted to the DPIE 3 months prior to commencement of the SFS's operation is in the process of being prepared and will also capture the Precinct Village and Car Park, when MOD 7 is approved.</p> <p>Conditions E2 – E11 further establish the operational noise limits for the SFS for event and non-event days, including mobile and fixed mechanical plant and equipment, energy generation plant and vehicles on the premises.</p> <p>As outlined above, the exhibited NVIA commits to detailing operational mitigation measures. Accordingly the exhibited NVIA combined with the ONMP and Conditions E2 – E11 collectively address the City of Sydney's request for:</p> <ul style="list-style-type: none"> <li>• the location, type and size of building services plant to be the subject of further design development that meets the applicable criteria at sensitive receivers including residential properties, UTS, Kirra and Fox Studios</li> <li>• event noise to comply with noise levels set out in Condition D48 and non-event noise levels to comply with Condition E2</li> <li>• any music in relation to retail background music, live music or performances to require assessment as either part of the ONMP or where relevant as part of future retail fit-out Development Applications.</li> </ul> <p>As the City of Sydney correctly highlights, the Event Management Plan may make provision for the carrying out of stand-alone events on non-event days. The Event Management Plan is currently under preparation, and requires consultation with the City of Sydney. The finalisation of the Event Management Plan does not preclude determination of MOD 7, however it will need to reflect the Precinct Village and Car Park as approved.</p> <p>There are accordingly sufficient mechanisms built into SSD 9835 to address the City of Sydney's comments.</p> |

| Issue Raised   | Applicant Response  |
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| <p><i>Construction noise and vibration</i></p> <p>It is recommended that the Construction Management Plan conditioned in the Stage 2 SSDA be updated or an addendum prepared to minimise potential impacts during construction. Any respite periods mandated in the Stage 2 consent should continue to be implemented in the construction of the Precinct Village and carpark.</p> | <p>Condition A55 requires the updating of all relevant plans/strategies following the approval of any modification. There is no intention to amend or revise the currently approved respite periods nominated in the approved Construction Environmental Management Plan (CEMP).</p> <p>There are accordingly sufficient mechanisms built into SSD 9835 to address the City of Sydney's comments.</p>   |
| <p><i>Waste</i></p> <p>It is recommended that a vermin proofing condition be included in relation to the main waste storage area.</p>  | <p>Noted.</p> <p>Venues NSW raises no objection to the DPIE imposing a suitably worded condition to address the City of Sydney's comments.</p>  |
| <p><b>Waste Management</b></p>   |   |
| <p>No Waste Management Plan (WMP) or Construction and Demolition Waste Management Plan (C&amp;DWMP) have been submitted with the modification documents.</p> <p>Without reviewing the WMP and C&amp;DWMP, the City cannot make comments on the development at this stage. These documents are requested for further review and comment.</p>  | <p>Condition B24 of SSD 9835 requires the preparation of a Construction Waste Management Plan (CWMP) which is required to address:</p> <ul style="list-style-type: none"> <li>• quantities of each waste type generated during demolition and the proposed reuse, recycling and disposal locations</li> <li>• removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines</li> <li>• measures to conduct electronic monitoring of waste vehicles entering and leaving the development site</li> <li>• details of arrangements for the disposal of waste from the premises with evidence that the waste facility is legally able to accept that waste.</li> </ul> <p>Consultation with, and/or City of Sydney endorsement of the CWMP, is not currently required by Condition B24.</p> <p>A CWMP has already been approved by the certifying authority in accordance with the requirements of SSD 9835 and is publicly available on the project website at: <a href="https://www.infrastructure.nsw.gov.au/media/2830/construction-waste-management-sub-plan.pdf">https://www.infrastructure.nsw.gov.au/media/2830/construction-waste-management-sub-plan.pdf</a></p> <p>Condition A55 requires the updating of all relevant plans/strategies following the approval of any modification. Following the approval of MOD 7, the CWMP will be updated to address the Precinct Village and Car Park.</p> <p>There are accordingly sufficient mechanisms built into SSD 9835 to address the City of Sydney's comments.</p> |

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| <b>Social Impacts</b>  |  |
| <p>The Social Impact Assessment has been reviewed and the following comments are made:</p> <ul style="list-style-type: none"> <li>• Detail is required as to whether the proposed children’s playground will be an inclusive playground, using the NSW ‘Everyone Can Play’ guidelines for the design.</li> <li>• Detail is required regarding who will manage the public facilities on the site, such as the tennis court and playground. Affordable access to facilities and services is a key focus for the City.</li> </ul>   | <p>The playground is capable of being designed to comply with the Everyone Can Play guidelines. Venues NSW would raise no objection to the DPIE imposing a suitably worded condition requiring the certifying authority to be satisfied that the guideline has been complied with.</p> <p>Venues NSW will manage the public facilities on the site. The playground and Precinct Village open spaces are proposed to be free and available to the general public. The tennis courts will be available for Stadium Fitness Facilities members and are a reinstatement of the former tennis courts that were located to the south of the old Allianz stadium and were removed as part of the demolition of SFS.</p> |
| <b>Transport for NSW</b>   |  |
| <b>Safety Audit of the Detailed Design</b>   |  |
| <p><i>Comment:</i></p> <p>Given the significant pedestrian usage of the site, TfNSW recommends that the Applicant undertake a Stage 3 Road Safety Audit be undertaken for proposed car park and road design of the Village Precinct.</p> <p><i>Recommendation:</i></p> <p>The Applicant is conditioned with:</p> <p>Prior to the issue of the construction certificate, a Stage 3 (Detailed Design) Road Safety Audit for the proposed site in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits shall be prepared by an independent TfNSW accredited road safety auditor. Based on the results of the road safety audit, the design drawings need to be reviewed to implement any safety measures.</p> | <p>Venues NSW raises no objection to the DPIE recommending a suitably worded condition requiring the preparation of a Stage 3 Road Safety Audit.</p>   |
| <b>Green Travel Plan</b>   |  |
| <p><i>Comment</i></p> <p>TfNSW has reviewed the Green Travel Plan under Consent Condition D14. The Applicant must update the Green Travel Plan (GTP) contained within Appendix B of the Sydney Football Stadium Redevelopment Transport Assessment for the Stage 2 Development.</p> <p><i>Recommendation:</i></p> <p>The Applicant is conditioned with:</p>  | <p>Venues NSW raises no objection to the DPIE modifying the existing Condition D14, which already requires the preparation of a Green Travel Plan, to address the matters raised by TNSW.</p> <p>It is requested that any such condition be refined to specifically apply to the Crown Certificate for the Precinct Village and Car Park and not broader works already underway on the site.</p>   |

| Issue Raised   | Applicant Response |
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| <p>The Green Travel Plan (GTP) GTP shall be updated to include an implementation strategy and action plan including dates and times, roles and responsibilities of who will be carrying out the tasks. The GTP must be prepared by a suitably qualified traffic consultant. The GTP will also include:</p> <ul style="list-style-type: none"> <li>• Objectives: The Green Travel Plan (GTP) must be updated to implement measures that will ensure non-private vehicular modes of transport are the preferred mode of travel to/from the project site.</li> <li>• Alignment: The updated GTP must align with the broader Moore Park Traffic and Transport Management Plan as made available by TfNSW.</li> <li>• Coordination: The updated GTP must be prepared in consultation with the Sydney Coordination Office and Transport Management Centre within TfNSW, Roads and Maritime Services, NSW Police, City of Sydney Council, SCSGT and Centennial Park and Moore Park Trust</li> <li>• Overall network map: The current GTP should replace any out-of-date bus, train or pedestrian or cycling route maps and pathways, and provide a current overall integrated network map for staff and patrons (one for event days, one for non-event days) to get to and from the site</li> <li>• Mode Share targets: The current GTP should provide a mode share table from a qualified traffic consultant to identify and provide existing and future mode share targets for staff and patrons to take sustainable active and public transport travel to and from the site and identifying and implementing measures to achieve those mode shares.</li> <li>• End of trip facilities: Additional bike racks, showers and change rooms and lockers shall be made available to staff and patrons to comfortably support increased cycling of staff and patrons in an end-to-end journey to the site. These facilities should be promoted within the “Implementation Strategy” listed below. <ul style="list-style-type: none"> <li>– Responsibilities: The updated GTP must identify the party or parties responsible for delivery and implementation of each element of the GTP throughout various stages of the development lifecycle</li> <li>– Parking management strategy</li> <li>– Integrated Ticketing - The GTP must describe initiatives to facilitate an integrated ticketing strategy across all of the event types in Sydney Football Stadium.</li> <li>– Funding the GTP: The GTP will need to be appropriately funded and otherwise resourced, by the proponent, for a period of at least 5 years, or via an appropriate appointed entity, such as a body corporate. This will include ongoing travel demand initiatives that will require resourcing. This is in recognition that any demand management interventions will need to be significant in scale to be effective. This should be covered in the updated GTP Implementation Strategy and Action Plan.</li> <li>– Data – The GTP must be updated to include available data from stakeholders within the Moore Park</li> </ul> </li> </ul> |                    |

| Issue Raised   | Applicant Response   |
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| <ul style="list-style-type: none"> <li>• Implementation Strategy: TfNSW recommends that you have a separate section within this updated GTP which has an implementation plan of tasks and actions, including all of initiatives and incentives, timing and completion dates, communications tasks, and who will do the tasks; this will ensure the overall effectiveness of the TDMP. The Implementation Strategy should:                             <ul style="list-style-type: none"> <li>– Identify the party or parties responsible for delivery and implementation of each element of the updated GTP throughout various stages of the development lifecycle, including for its ongoing implementation, monitoring and review, for a period of at least 5 years post-Occupation.</li> <li>– Be updated both on an annual basis, and when future transport services and pathways eventuate.</li> </ul> </li> <li>• Strategies and initiatives: The updated GTP will need to identify and implement planned strategies and initiatives that reduce the proportion of single occupant car travel to/from the site (including public and active transport) and increasing the use of public and active transport travel to the site including                             <ul style="list-style-type: none"> <li>– Pre-loaded opal cards when staff and patrons first occupy the site.</li> <li>– Staff that are committed to active travel receive subsidised panniers or backpacks.</li> <li>– Wayfinding at the site for End of Trip facilities.</li> <li>– Incorporating a role for a GTP sustainable travel champion that focuses on modelling the desired behaviours and positive communication around active and public transport.</li> <li>– Implementing a car-pooling scheme with guaranteed ride home.</li> </ul> </li> <li>• Travel Survey – TfNSW requests that the GTP includes a proposed travel survey for the site that can be carried out at the commencement of occupation of the site, and on an annual basis.</li> </ul> <p>The Applicant should submit the updated GTP for the endorsement of TfNSW via sco@transport.nsw.gov.au, prior to the issue of the completion certificate</p> |  |
| <p><b>Transport Access Guide</b></p> <p>The Applicant shall prepare a Transport Access Guide in consultation with TfNSW, implemented and maintained by the operators of the premises and be made available to staff, guests, clients, customers and visitors at all times. The report shall be submitted to and approved by TfNSW prior to the issue of an Occupation Certificate for the site/use. The Transport Access Guide is to include (but not be limited to) the following:</p> <ul style="list-style-type: none"> <li>• Information regarding off-street car parking and passenger pick-up and set-down areas at the development site;</li> <li>• Suitable nearby drop-off/pick-up locations;</li> <li>• Identification of areas where drop-off/pick-up is prohibited and instruct visitors to avoid use of these areas; and</li> </ul>   | <p>Venues NSW considers that this requirement could be captured by any revisions made to the existing Condition D14 which requires the preparation of a Green Travel Plan.</p> <p>Alternatively, Venues NSW raises no objection to DPIE recommending a suitably worded standalone condition.</p> |

| Issue Raised   | Applicant Response   |
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| <ul style="list-style-type: none"> <li>Suitable nearby Taxi Zones.</li> </ul> <p>The Applicant shall submit the Transport Access Guide for the endorsement to TfNSW via sco@transport.nsw.gov.au, prior to the issue of the completion certificate.</p>  |  |
| <p><b>Freight and Servicing Management</b></p>   |  |
| <p>Prior to the issue of any construction certificate, the Applicant shall update the Freight and Servicing Management Plan in consultation with TfNSW. This plan shall ensure that any potential traffic and safety impacts associated with the loading dock operation are mitigated. The Applicant shall submit a copy of the final plan to TfNSW for endorsement via sco@transport.nsw.gov.au. The Plan needs to specify, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>Details of the development’s loading and servicing profile, including the forecast loading and servicing traffic volumes by vehicle size, frequency, time of day and duration of stay;</li> <li>Details of freight and servicing facilities that may be required either within the subject site or other sites in the immediate vicinity which adequately accommodate the forecast demand of the development so as to not rely on the kerbside restrictions to conduct the development’s business; and</li> <li>Details of measures to manage any potential traffic and safety impacts of the loading docks operation in particular potential queuing on public roads and potential conflicts between freight vehicles accessing the loading dock and transport users accessing the Precinct.</li> </ul> <p>The Freight and Servicing Management Plan shall be implemented by the Applicant following the issue of the completion certificate.</p> | <p>Venues NSW raises no objection to the DPIE recommending a suitably worded condition requiring the preparation of the requested Freight and Servicing Management Plan, however the final wording should be amended to reflect recent discussion with TfNSW, including:</p> <ul style="list-style-type: none"> <li>the Plan should be required to be completed prior to occupation commencing rather than prior to release of the Occupation Certificate given the Plan relates to the operation of the site); and</li> <li>the wording of the condition should note that the Plan is to cover only the Precinct Village and Car Park as opposed to the broader SFS loading and servicing arrangements.</li> </ul> <p>Suggested mark ups have been identified below:</p> <p><del>Prior to the issue of any construction certificate</del> <b>commencement of operations of the Precinct Village and Car Park</b>, the Applicant shall <b>prepare a update</b> the Freight and Servicing Management Plan in consultation with TfNSW. This plan shall ensure that any potential traffic and safety impacts associated with the loading dock operation are mitigated. The Applicant shall submit a copy of the final plan to TfNSW for endorsement via sco@transport.nsw.gov.au. The Plan needs to specify, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>Details of the development’s loading and servicing profile, including the forecast loading and servicing traffic volumes by vehicle size, frequency, time of day and duration of stay;</li> <li>Details of freight and servicing facilities that may be required either within the subject site or other sites in the immediate vicinity which adequately accommodate the forecast demand of the development so as to not rely on the kerbside restrictions to conduct the development’s business; and</li> <li>Details of measures to manage any potential traffic and safety impacts of the loading docks operation in particular potential queuing on public roads and potential conflicts between freight vehicles accessing the loading dock and transport users accessing the Precinct.</li> </ul> <p><del>The Freight and Servicing Management Plan shall be implemented by the Applicant following the issue of the completion certificate.</del> <b>during operation of the Precinct Village and Car Park.</b></p> |

| Issue Raised   | Applicant Response   |
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| <p><b>Construction Pedestrian and Traffic Management</b></p>   |  |
| <p>Prior to the issue of any Construction Certificate or any preparatory, demolition or excavation works, whichever is the earlier, the Applicant shall:</p> <ul style="list-style-type: none"> <li>• Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. The CPTMP needs to specify matters including, but not limited to, the following: <ul style="list-style-type: none"> <li>– A description of the development;</li> <li>– Location of any proposed work zone(s);</li> <li>– Details of crane arrangements including location of any crane(s);</li> <li>– Haulage routes;</li> <li>– Proposed construction hours;</li> <li>– Predicted number of construction vehicle movements and detail of vehicle types, noting that vehicle movements are to be minimised during peak periods;</li> <li>– Details of specific measures to ensure the arrival of construction vehicles to the site do not cause additional queuing on public roads;</li> <li>– Details of the monitoring regime for maintaining the simultaneous operation of buses and construction vehicles on roads surrounding the site;</li> <li>– Pedestrian and traffic management measures;</li> <li>– Construction program and construction methodology;</li> <li>– A detailed plan of any proposed hoarding and/or scaffolding;</li> <li>– Consultation strategy for liaison with surrounding stakeholders, including other developments under construction;</li> <li>– Any potential impacts to general traffic, cyclists, pedestrians and light rail and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works;</li> <li>– Cumulative construction impacts of surrounding projects. Existing CPTMPs for developments within or around the development site should be referenced in the CPTMP to ensure that coordination of work activities are managed to minimise impacts on the surrounding road network; and</li> <li>– Proposed mitigation measures. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP.</li> </ul> </li> <li>• Submit a copy of the final plan to sco@transport.nsw.gov.au for TfNSW endorsement; and</li> <li>• Provide the builder's direct contact number to small businesses adjoining or impacted by the construction work and TfNSW to resolve issues relating to traffic, public transport, freight, servicing and pedestrian access during construction in real time. The Applicant is</li> </ul> | <p>Venues NSW raises no objection to the DPIE modifying the existing Condition B31, which already requires the preparation of a Construction Traffic and Pedestrian Management Plan, to address the matters raised by TNSW.</p> <p>It is requested that any such condition be refined to specifically apply to the Crown Certificate for the Precinct Village and Car Park and not broader works already underway on the site.</p> |

| Issue Raised   | Applicant Response   |
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| <p>responsible for ensuring the builder’s direct contact number (via sco@transport.nsw.gov.au) is current during any stage of construction.</p>  |  |
| <b>Randwick City Council</b>   |  |
| <p><b>Use of the Precinct Village for Events</b><br/>                     SSD 9835 proposed the use of the Precinct Village for events on both event days and non-event days. It is noted that the site is proposed to be used for a variety of activities such as public announcements/music, markets and stalls, pop-up bars, and as a live site for sold out events for public use. However, the application provides limited details with regards to the specifications of the event types and is missing critical information such as the number of events to be held annually, the times that the events will commence/cease, total patron capacity, noise emissions and other impacts. The application states that the event details will be provided in an Event Management Plan that is currently being prepared. Such details should be provided upfront with the application to adequately assess the impacts. Council raises concerns about the proposed intensified use of the site for events and the associated amenity impacts on Centennial Parklands and the surrounding Randwick City Council Local Government Area. Such activities should not result in any additional adverse impacts on carparking facilities, local traffic congestion, public transport capacity, community amenities, and noise emissions.</p> | <p>The SFS inclusive of the Precinct Village and Car Park will continue to operate under the terms of the former SFS, which did not have any upper limit for events. SSD 9835 as currently approved does not impose any limitations on event numbers. The Precinct Village and Car Park does not propose to alter the approved restrictions for music concerts.</p> <p>The Event Management Plan is currently under preparation and falls outside the scope of this Modification Application and SSD 9835 MOD 7. Notwithstanding this, as detailed in the exhibited Modification Application and technical assessments, the Precinct Village and Car Park will not result in any significant or adverse new impacts in relation to noise or light emissions, traffic congestion, or public transport capacity.</p> |
| <p><b>Trees</b><br/>                     Council supports the proposed tree retention/replacement ratio as a minimum for the loss of trees as a consequence of the development. It is noted that 39 trees are proposed to be removed and 89 trees are proposed to be planted within the Precinct Village and car park, maintaining and exceeding the tree replacement ratio of 1 (tree lost): 1.5 (trees replaced) of the approved concept approval.</p>   | <p>Noted. As detailed in the revised landscape and architectural plans provided at <b>Appendix B</b> and <b>C</b>, the amended design will continue to achieve and exceed the conditioned replacement ratio.</p>   |
| <b>Sydney Water</b>  |  |
| <b>Heritage</b>  |  |
| <p>The works cannot, without approval from the NSW Heritage Council, adversely impact Busby’s Bore in any way. As per the archaeological report, no impacts to the bore or its spur are proposed. Based on the information supplied, Sydney Water has no heritage related concerns. Sydney Water supports the recommendations outlined in the Heritage Impact Assessment report (page v.) prepared by Artefact (September 2021).</p>   | <p>Venues NSW welcomes Sydney Water’s support for the recommendations made by Artefact.</p>  |
| <b>Stormwater</b>  |  |
| <p>The proposed development will impact Sydney Water’s 600mm stormwater main which is located within the development site. In its current form, the development does not comply with Sydney Water’s building over and adjacent to stormwater requirements.</p> <p>Sydney Water notes that the proponent intends to deviate this existing Sydney Water’s 600mm pipe to facilitate the proposal. However, no further details are available for the deviation of the 600mm stormwater pipe for Sydney Water to comment any further.</p>   | <p>The Architectural Plans and Landscape Plans provided at Appendix B and C have been updated to respond to this request.</p> <p>An application has been made by Infrastructure NSW to Sydney Water to divert the stormwater main, and is currently under assessment.</p>  |

| Issue Raised  | Applicant Response   |
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| <p>Sydney Water will object to the proposal, unless the proposed 600mm stormwater deviation pipe complies with the following requirements:</p> <ul style="list-style-type: none"> <li>• No buildings or permanent structures are to be proposed over the new deviated 600mm stormwater pipe or within 1m from the outside wall of the new stormwater pipe. Permanent structures include (but are not limited to) basement car parks, hanging balcony, roof eaves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply for unlimited depth and height.</li> <li>• The Proponent is required to submit the elevation drawings with the new deviated stormwater pipe, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the new deviated stormwater pipe.</li> </ul> <p>The proposed new 600mm stormwater deviation pipe is to be designed and constructed according to Sydney Water’s deviation of stormwater asset requirements.</p> |  |
| <p><b>Waste and Wastewater Servicing</b></p> <p>Water and wastewater servicing is available to the site. Amplifications, adjustments and/or minor extensions to the networks may be required complying with the Water Services Association of Austral (WSAA) code – Sydney Water edition. Further servicing requirements will be provided at the Section 73 application phase.</p> <p>This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.</p>   | <p>Noted, a Section 73 application will be pursued at the construction stage of the project.</p> |

## 4.2 Response to Organisation Submissions

The following table (**Table 2**, overpage) includes a response to the full text of submissions provided by or on behalf of organisation, special interest groups, and other stakeholders. The full text of each submission is provided in the left-hand column, accompanied by the corresponding response in the right-hand column. It is emphasised that the responses provided in this table have been authored with the technical consultant team.

**Table 2 Response to organisation submissions**

| Issue Raised   | Applicant Response  |
|--|---|
| <b>University of Technology, Sydney (UTS) and Rugby Australia (joint submission)</b>   |   |
| <p>UTS and Rugby Australia offer the following comments in support of the proposal:</p> <ul style="list-style-type: none"> <li>• UTS and Rugby Australia strongly support the development of the new precinct as part of a genuine international sporting and health and fitness research hub; and,</li> <li>• UTS and Rugby Australia strongly support the proposal’s integration of carparking and servicing into the precinct to provide a superior design quality and operational streamlining for this significant public facility and the park.</li> </ul>   | <p>Noted.</p> <p>Venues NSW welcomes UTS’ and Rugby Australia’s support for the Precinct Village and Car Park project.</p>  |
| <p>The need to ensure that any short term impacts on Rugby Australia House arising out of the construction are well managed, including in particular any constraints on loading facilities for Rugby Australia and UTS operations;</p>   | <p>The CEMP (Condition B19) and the requirement to prepare a preconstruction dilapidation report (Condition B6) provide satisfactory protections to ensure that construction works are well managed adjacent to adjoining buildings such as Rugby Australia House.</p>  |
| <p>The provision of longer-term solutions for servicing and loading of Rugby Australia House by larger vehicles (which has been significantly impacted by recent changes to Moore Park Rd due to the cycleway and the reduced entry driveway arrangements directly arising out of the stadium construction).</p> <p>In particular, it is noted that proposed new service road at level 0 of the proposed modification design appears to be at or near the level of the basement of Rugby Australia House. There appears to be an opportunity to provide integrated servicing directly into the Rugby Australia House basement though minimal design changes at or near the western end of the OB compound (or possibly through the western end OB compound, which is not utilised outside major events). It is noted that if such a change can be accommodated this would provide a long-term solution to the current servicing constraints for Rugby Australia House and could remove the need for service vehicles to access the building directly from Moore Park Road.</p> <p>Alternatively, opportunities for fully resolved longer-term loading solutions at both the UTS (western) end of the building and the Rugby Australia (eastern) end of the building at Moore Park Road level must be delivered as part of the public domain and traffic design of the proposed modification;</p> | <p>Rugby Australia House and the UTS building do not form part of the existing or modified project boundary site. However, Venues NSW will continue to engage with both Rugby Australia and UTS on operational matters.</p>   |
| <p>Careful design of the public domain interface with Rugby Australia House, including consultation with UTS and Rugby Australia about the details of the design and the seamless integration of the public domain with whatever long-term solution is implemented for servicing of Rugby Australia House (which could include relocation of some existing kerbing, bollards, vehicle barriers or other building infrastructure); and</p>  | <p>Updated Landscape Plans have been prepared by Aspect Studios and provided at <b>Appendix C</b>. Further detailed public domain plans will be prepared at the construction stage in accordance with Condition B12 of the consent, noting that Condition A55 further requires updating of all relevant plans/strategies following the approval of any modification.</p> <p>While these areas are outside of the project boundary, Venues NSW will continue to involve both Rugby Australia and UTS throughout the detailed design phase for the project.</p> |

| Issue Raised  | Applicant Response  |
|---|---|
| <p>The investigation of mechanisms to ensure reasonable and competitive pricing of the proposed car parking outside of event times so that there can be an uptake of the parking provision in the development by UTS and Rugby Australia staff, students and visitors, with flow-on effects to benefit residents in the local area impacted by pressure on on-street parking.</p> <p>In particular, although UTS and Rugby Australia operations rely on a mix of transport options, including public transport, active transport and private vehicles, operations will again be impacted by a shortage of carparking in the area when staff and student building occupancies return to pre-Covid-19 levels. This increases pressure on the on-street parking in the Paddington area, impacting on residents and their visitors, many of whom rely on on-street parking. UTS and Rugby Australia see an opportunity to help relieve pressure on the on-street parking in the area through increased uptake of off-street parking that will be provided in the new facility, but only if the pricing of that parking outside event times is competitive for Rugby Australia House users (and for those of the other similar facilities in the international sporting and health and fitness research hub precinct). We would prefer that such an arrangement be built into any approval conditions for the car park to ensure it would be preserved over the longer term.</p> | <p>The pricing structure for the car park will be subject to further review and detail prior to the operation of the car park, and is not a relevant environmental planning consideration for the consent.</p>  |
| <p><b>Action for Public Transport (NSW) Inc.</b></p>  |   |
| <p>We object to this proposal on the ground that it should be unnecessary, given the public transport services in the area. In particular, there has been major investment in the light rail service along Anzac Parade which provides regular services to Kingsford, Randwick and the CBD plus, on days when a major event is held in the area, shuttle services to Central Station. These shuttle services use a platform that was constructed for the express purpose of handling crowds on sporting event days. It is better to use the existing investment than to spend a large sum on a car park that will only be full on the few days per year when there is a major event.</p>  | <p>For the purposes of assessing the Precinct Village and Car Park, the mode share established for the Stage 2 DA is adopted and has not changed, which was developed in consultation with TfNSW, modelling, and surveys (including for events where the EP2 (Upper and Lower Kippax) and EP3 (Showground) on-grass car parking was available). The mode share considers that public transport will make up 30% of trips to and from events, and other sustainable transport modes such as walking and cycling will comprise a further 20% of trips.</p> <p>Condition D14 of the consent requires the preparation of a Green Travel Plan which will identify specific tools and actions to increase the use of sustainable transport options, including promoting integrated ticketing.</p> <p>It is further emphasised that the Modification Application will facilitate the removal of the EP2 (Upper and Lower Kippax) on-grass parking area within Moore Park opposite the MP1 Car Park, and therefore, does not increase the total car parking capacity in the precinct, but rather relocates the car parking from EP2 within the development resulting in a minor decrease at the completion of Stage 2 of approximately 1,140 spaces during events</p> |

| Issue Raised   | Applicant Response  |
|--|---|
| <p>We also object on the ground that the proposal conflicts with existing State policies to move towards net zero greenhouse gas emissions. The cars that would use this facility if constructed will occupy valuable road space and, in most cases, consume fossil power for their journeys. If the people in the cars instead rode public transport, much less resources would be used. Wasteful transport projects have no place in this state.</p>   | <p>The modified development will still achieve a Gold LEED rating through implementing a range of sustainability measures. The modified development also remains consistent with the relevant planning policies, goals and strategic planning objectives in the NSW Energy Efficiency Action Plan, the NSW Resources Efficiency Policy (GREP), and the Sustainable Sydney 2030.</p> <p>As detailed in the response to agency submissions above, a number of initiatives are being explored to improve the sustainable construction and operation of the Precinct Village and Car Park in accordance with the sustainability commitments made under the Concept Proposal and Stage 1 DA (SSD-9249).</p>  |
| <p><b>The Paddington Society</b></p>   |   |
| <p>A firm commitment from Venues NSW is required to remove all on-grass event-day parking, from the rest of Moore Park (EP3), as soon as possible, and by 2024, a year after the completion of Stage 2 of The Precinct Village and Carpark, at the latest. Without this commitment and a specified timeline, parts of Moore Park would continue to degrade. This is at a time when public transport needs to be prioritised and car traffic reduced for a sustainable city. Associated with this, there needs to be a firm commitment to integrated ticketing and the use of satellite parking for events.</p>   | <p>Venues NSW does not control or operate on grass parking on Moore Park.</p> <p>Parking on EP3 (Showground) will be progressively removed by Greater Sydney Parklands in consultation with Venues NSW, Transport for NSW and Moore Park Events Operations Group pending successful development and implementation of precinct-wide transport plans with the view of removing all on-grass car parking in Moore Park once the Precinct Village and Car Park is operational.</p> <p>Pursuant to Condition D14 of the SSD 9835, the Green Travel Plan that is currently under preparation, promotes the use of public transport when travelling to and from events. The GTP also promotes integrated ticketing for events, while recognising that integrated ticketing is subject to negotiations and agreement between the individual sporting codes and TfNSW. Venues NSW is not an active participant in these negotiations.</p> |
| <p>Currently, Centennial and Moore Park Parklands gain some financial benefit from the on-grass event-day parking, in a context of very little direct government funding provided for the Parklands. While we welcome the on-grass parking removal, we recommend that the Parklands continue to share in the revenue generated by the carpark, tennis courts, and retail outlets, which are all situated on Crown land, for the benefit of that public Park.</p>   | <p>Revenue and expenditure are not relevant environmental planning considerations.</p>  |
| <p>Since the development is on Crown Land, we recommend that the Members-only tennis courts, be removed, or at least halved in number and opened for hire by the community. The current proposal effectively sterilises half of the subject site since the tennis courts will only be available for members, are paved in artificial material, and are fenced, restricting the public to narrow circulation corridors. The stated aim of converting the courts to an 'events platform' at times seems unrealistic. The tennis club building, located in the sunniest spot of this area, also appears excessive for four tennis courts, considering the retail pavilion could cater for most needs, and would be better as public open space, for shaded permanent seating. The less built structures in this park setting, the better.</p> | <p>The proposed tennis courts are a reinstatement of the previously existing tennis courts that were demolished as part of the redevelopment of the site. As outlined in the exhibited Planning Statement (Ethos Urban, October 2021), the tennis courts are proposed to be primarily as part of the approved Stadium Fitness Facilities, however, they will also be used as flexible event spaces commensurate with the SFS concourse. Accordingly, some community access to the tennis courts and the building adjacent to the tennis courts will be possible during events. Other public tennis courts are available in close proximity of the site, including at Centennial Parklands Sports Centre within walking distance of the site.</p>  |

| Issue Raised   | Applicant Response   |
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| <p>Note that recent approvals for the White City (Hakoah Club) and the Weigall Sports Complex (Sydney Grammar School) on the north side of Paddington were both conditioned to include some community access to sporting facilities.</p>   | <p>The Precinct Village and Car Park enables public access and use of the site and is an improved outcome recognising that the approval currently requires this land to be used as an at-grade carpark for members, and does not provide any publicly accessible or community space.</p>   |
| <p>The Village Precinct pavilion as currently designed acts as a blank built barrier to spaces to the East, and would be better as an open verandah which opens both to the east and the west. The proposed height of 6m seems excessive for a 1-storey facility. In addition, there appears to be masonry towers (ventilation for the carpark?) at almost 10m above the plaza which have not been well illustrated in 3D views and with no mention of their impact on air quality in this residential precinct.</p> <p>Additionally, the green roof shown in all illustrations of the proposal does not appear in the Landscape Drawings, and so significantly mis-represents the proposal. If the pavilion is to 'blend in' to its parklands setting, a planted roof is essential, and will improve the proposal's sustainable values. Green paint will not do! No roof plan has been provided, nor room type details on the Plaza Level floor plan, nor Mechanical Engineering documentation (noted on Landscape Plan LA 201), all serious omissions.</p> | <p>The proposed 6m height of the pavilion seeks to provide a flexible space that is capable of accommodating a diverse range of retail and dining uses. By providing a generous floor to ceiling height the future uses within these spaces will benefit for high amenity, increased solar access and natural ventilation, making them enjoyable spaces to visit.</p> <p>As detailed in the amended Architectural Plans and Landscape Plans at <b>Appendices B and C</b>, the green edge on the roof has been replaced with pebbles installed in a visually interesting, artistic pattern.</p>   |
| <p>The proposal's Transport Assessment does not address the impact in either construction or operation of the whole Stadium precinct of non-resident parking in local streets. Such parking should be assessed, discouraged and policed. Although the proposed management of the Precinct carpark aims to discourage commuter parking, there needs to be a pricing structure that encourages UTS &amp; NRL staff and students, and Precinct retail staff, to park in the Precinct Carpark and not in local streets The applicant needs to arrange with the City of Sydney Council (including contributing to funding) for more parking policing in the local streets, especially during well attended Stadium events and double-headers.</p>   | <p>Public parking on surrounding residential streets is outside of the scope of this application and cannot be controlled by Venues NSW.</p> <p>The pricing structure for the car park will be subject to further review and detail prior to the operation of the car park and is not a relevant environmental planning consideration for the consent.</p>   |
| <p>The current construction of the Stadium has resulted in many construction workers parking in local South Paddington streets, which were already at parking capacity, causing much grief to residents. Any further construction for this project needs to provide parking on site for all workers and precinct users, or an arrangement made with other parking providers that stops this practice. Again, the applicant needs to arrange with (including contributing to funding) the City of Sydney Council for more parking policing in the local streets.</p>  | <p>Public parking on surrounding residential streets is outside of the scope of this application and cannot be controlled by Venues NSW.</p> <p>The approved Construction Traffic and Pedestrian Management Plan (Construction B31) and Construction Worker Transportation Strategy (Condition B35) collectively address construction worker vehicle movements within the vicinity of the precinct, including any off-site worker parking location/s away from the Precinct. Both documents are available on the project website at: <a href="https://www.infrastructure.nsw.gov.au/media/2829/construction-traffic-and-pedestrian-management-plan.pdf">https://www.infrastructure.nsw.gov.au/media/2829/construction-traffic-and-pedestrian-management-plan.pdf</a></p> |
| <p>The current construction of the Stadium has resulted in many construction workers parking in local South Paddington streets, which were already at parking capacity, causing much grief to residents. Any further construction for this project needs to provide parking on site for all workers and precinct users, or an arrangement made with other parking providers that stops this practice. Again, the applicant needs to arrange with (including contributing to funding) the City of Sydney Council for more parking policing in the local streets.</p>  | <p>Owing to the works occurring across the precinct, the provision of construction worker parking on the site is not possible.</p>   |
| <p>The proposal's Heritage Impact Statement confirms that Busby's Bore, including the abandoned spur line which runs through the proposed carpark, is a State Significant Heritage Item which</p>  | <p>Artefact has provided an updated heritage response at <b>Appendix F</b>. It confirms the processes underway to identify the location and direction of the spur, however, there</p>  |

| Issue Raised   | Applicant Response   |
|--|--|
| <p>must be protected, yet states that the exact location of the spur is unknown. The applicant needs a contingency plan to redesign the carpark, including featuring the heritage structure, if the spur line is impacted by the current design. In addition, there needs to be geotechnical advice on the impact of changed ground water on these tunnels.</p>  | <p>is no guarantee that methods to ground truth the location will be successful and as such to request a condition that the bore be definitely located is imposing a condition that might be impossible to fulfill without excavation. The current investigations represent best endeavours to accurately locate the position of the spur.</p> |
| <p><b>Paddington-Darlinghurst Community Group</b></p>  |  |
| <p>Our Community Group is very pleased that the SCGT is finally accepting responsibility for providing car parking on land under their control. We are also very pleased and support the Minister when he said "Car parking will be moved off the grass and underground at Moore Park, creating more open space for the community, following the announcement of a new village precinct and carpark adjacent to the Sydney Football Stadium (SFS) redevelopment.</p> <p>Minister for Planning and Public Spaces Rob Stokes said the proposed carpark will ensure works to improve 'Upper Kippax' can begin immediately, transforming the damaged field into a community green with a central sports field, shaded walkways and picnic amenities. " and "The precinct project, which will be funded by Venues NSW, will be delivered in two stages, with the first stage to be operational by the end of next year. The second stage will be complete in 2023. Once the car park is fully operational, all remaining on-grass parking will be removed from Moore Park."</p> | <p>Noted. This application responds to the comments of the community during the original exhibitions of the Concept Proposal and Stage 1 DA (SSD-9249) and the Stage 2 DA (SSD-9835), which identified a desire to remove the on-grass carparking in Moore Park as a key precursor to the successful operation of the precinct.</p>            |
| <p>We support Instrument 7.1 Car Parking which states the proposed modification will facilitate the following via a new condition of consent:</p> <ul style="list-style-type: none"> <li>the immediate removal of the northern portion of the EP2 (Upper Kippax) on-grass parking area; and</li> <li>the removal of the southern portion of EP2 (Lower Kippax) prior to the operation of Stage 2 of the Precinct Village and Car Park. The removal of on-grass parking at EP2 (Upper and Lower Kippax) will enable the permanent use of this space as public open space consistent with the Moore Park Masterplan 2040.</li> </ul>   | <p>Noted.</p>  |
| <p>We fully support that on grass car parking is removed from EP2 and EP3 when the Village Precinct is completed. We therefore support the construction of the event plaza and Precinct Village above ground and a 1,500 space car park beneath.</p>   | <p>Noted.</p>  |
| <p><i>Precinct wide connections</i></p> <p>Light rail – should and could be greatly improved with the construction of another platform on the stadium side of the eastbound track - then passengers arriving from Central can alight without having to cross the track - nor do they mix with passengers arriving from Randwick / Kingsford. It is a simple fix with great benefits</p>  | <p>The proposed works fall outside the scope of this application.</p>  |

| Issue Raised  | Applicant Response  |
|---|---|
| <p>Pedestrian Access – should be made safer and more efficient by ensuring that the Pedestrian lights at the intersection of the Bus Corridor /Moore Park Road and Anzac Parade are automated. Currently this is a very dangerous intersection. Surely when busses are not using the Bus lane (and they can only proceed at set times) then the green walk sign should automatically appear for pedestrians</p> | <p>The proposed works fall outside the scope of this application.</p> |
| <p><i>Access and Circulation</i></p> <p>Pedestrian crossing is required from east side of Flinders St to south side of Moore park Road at Anzac Pde- currently very dangerous</p>   | <p>The proposed works fall outside the scope of this application.</p> |

### 4.3 Response to Public Submissions

The below table (**Table 3**, overpage) provides a description of the matters raised in the submissions from the general public and a summary of the response and references to where these issues have been covered in the detailed documentation as relevant.

**Table 3 Response to public submissions**

| Issue               | Summary comments   | Response  |
|---------------------|--|---|
| Traffic and Parking | <ul style="list-style-type: none"> <li>There is no need for an additional 1,500 space car park given the public transport options that surround the SFS, including the Light Rail, trains and buses.</li> </ul>  | <ul style="list-style-type: none"> <li>The removal of on-grass parking in the EP2 and EP3 parking areas, in conjunction with the repurposing of the 540 space MP1 Car Park will result in a net reduction of approximately 1,140 event day parking spaces, which is in line with Transport for NSW's objective to reduce car parking in the precinct.</li> <li>Venues NSW is currently developing the Event Car Parking Management Plan required under Condition D50 of SSD 9835, and in doing so will consider alternative strategies for SFS patrons on event days that will include targets outlined in the Green Travel Plan to reduce the overall parking demand in the precinct.</li> </ul>   |
|                     | <ul style="list-style-type: none"> <li>Insufficient parking to cater towards the patronage of the Stadium.</li> </ul>  | <ul style="list-style-type: none"> <li>The progressive removal of on-grass parking is in line with the Moore Park Master Plan 2040 and Transport for NSW's objectives. Public and active modes of transport will be encouraged to mitigate the requirement for on-site parking during events.</li> </ul>  |
|                     | <ul style="list-style-type: none"> <li>Construction workers already park in the surrounding residential streets and this will be exacerbated by the proposed development.</li> <li>Parking should be provided for construction workers as well as regular workers during construction activity.</li> <li>The proposal does not address the broader issue of patrons continuing to park in surrounding residential streets. Reserving the village car park for patrons with a genuine need to avoid public transport does not solve the problem.</li> </ul> | <ul style="list-style-type: none"> <li>The approved Construction Traffic and Pedestrian Management Plan (Construction B31) and Construction Worker Transportation Strategy (Condition B35) collectively address construction worker vehicle movements within the vicinity of the precinct, including any off-site worker parking location/s away from the Precinct. Both documents are available on the project website at: <a href="https://www.infrastructure.nsw.gov.au/media/2829/construction-traffic-and-pedestrian-management-plan.pdf">https://www.infrastructure.nsw.gov.au/media/2829/construction-traffic-and-pedestrian-management-plan.pdf</a>. Owing to the works occurring across the precinct, the provision of construction worker parking on site is not possible. Construction workers choosing to park illegally in contrast with what is specified within the CMP is outside of the scope of this application and cannot be controlled by Venues NSW. This matter was addressed as part of the exhibited, and ultimately approved, Environmental Impact Statement prepared for the Stage 2 DA (SSD 9835).</li> <li>Car parking facilities are available at Entertainment Quarter and are considered a feasible option given those facilities are not highly utilised during construction hours (ie: there is no demand conflict between construction works and Entertainment Quarter and other precinct visitors). In addition, and consistent with many large-scale construction projects occurring across the city, the appointed contractors will be encouraged to use other forms of transport to travel to and from the site.</li> <li>The overall reduction in total event day parking spaces is consistent with the Moore Park Masterplan 2040 which seeks to promote patrons to utilise active and public modes of transport.</li> </ul> |
|                     | <ul style="list-style-type: none"> <li>Increase in traffic on local roads</li> <li>Driver Avenue should be closed on event days outside peak hours to mitigate traffic impacts</li> </ul>  | <p>JMT Consulting has provided a revised Traffic Statement (refer <b>Appendix E</b>), with the updated modelling confirming that intersections in the vicinity of the site will operate at an acceptable level of service with no change to current conditions. This</p>  |

| Issue                 | Summary comments   | Response  |
|-----------------------|--|---|
|                       | <ul style="list-style-type: none"> <li>Traffic funnelling on to Moore Park Road will create congestion impacts.</li> <li>Increased capacity of Stadium reducing on-street parking on event days for surrounding residents</li> <li>Support the removal of on grass parking and returning this space to be recreational only</li> </ul>   | <p>verifies the conclusion drawn by TfNSW in their review of the proposal that the modification will have a negligible impact on the surrounding state road network and TfNSW infrastructure.</p> <p>No change is proposed to the capacity of the stadium. The proposed parking enables the progress removal of on-grass carparking, and as such supports the functionality and operation of the stadium including providing necessary event parking.</p> <p>Illegal parking is outside of the scope of this application and cannot be controlled by Venues NSW. This matter was addressed as part of the exhibited, and ultimately approved, Environmental Impact Statement prepared for the Stage 2 DA (SSD 9835).</p> <p>Noted. This initiative is in line with the broader strategic planning framework detailed within the Moore Park Masterplan 2040.</p>   |
| Visual and Built Form | <ul style="list-style-type: none"> <li>There needs to be adequate walking and cycling options within the Precinct Village</li> <li>There is no need for additional retail and entertainment options in this part of the City. The development will result in there being no open space at Kippax Lake.</li> <li>The nearby Entertainment Quarter and Oxford Street already exist as retail and entertainment options</li> <li>Surrounding sites should be afforded development uplift to align with the built form of the new Stadium and Precinct Village.</li> <li>Support for the additional retail tenancies and recreational spaces.</li> </ul> | <p>As detailed within the Modification Application, the Precinct Village and Car Park will enhance precinct accessibility by virtue of additional accessible paths of travel between Driver Avenue and the Stadium concourse. Additional bicycle parking will be provided as part of the precinct to support cycling to and from the site.</p> <ul style="list-style-type: none"> <li>The retail offering is envisaged to be ancillary to and support the wider operation of the stadium, members facilities and recreational areas, providing services to patrons and members already utilising the facilities as opposed to being a 'destination' shopping and retail precinct.</li> <li>The proposed Precinct Village and Car Park does not occupy any land controlled by the Greater Sydney Parklands, including Moore Park and Kippax Lake. Rather, the proposal will replace the currently approved MP1 at-grade car park with a more versatile precinct including a landscaped and inviting interface to Moore Park. The interface to Kippax Lake is improved by the Precinct Village and Car Park.</li> </ul> <p>Any rezoning or amendments to principal development standards at surrounding sites is at the discretion of the respective Council and is not within the scope of this application.</p> <p>Noted. The Precinct Village and Car Park seeks to deliver a vibrant, user friendly space that contributes to the wider precinct.</p> |
| Operational Noise     | <ul style="list-style-type: none"> <li>The noise level from the previous Stadium should not be exceeded as part of this proposal. Stadium design should therefore enclose the roof to mitigate noise</li> </ul>  | <p>No change is proposed as part of this application to the approved stadium or the existing SCG.</p>   |

| Issue        | Summary comments   | Response  |
|--------------|--|---|
|              | <ul style="list-style-type: none"> <li>• Fire alarms should be controlled. The SCG fire alarm is triggered intermittently and causes disturbance to residents.</li> </ul>                        |   |
| Tree Removal | <ul style="list-style-type: none"> <li>• The existing trees on the periphery of this development along Driver Avenue and Moore Park Road should not be removed or damaged in any way.</li> </ul> | <p>32 of the trees proposed to be removed are classified as 'consider for removal' whilst 2 trees are of poor health and structural condition and have been classified as 'priority for removal.'</p> <p>While 11 trees with higher retention values are proposed to be removed, this represents a minimal portion of all trees with a corresponding retention value. The proposal has been designed so as to minimise the required removal of trees with a higher retention value. As well as this, 110 trees are proposed to be planted within the Precinct Village and Car Park, maintaining and exceeding the tree replacement ratio of 1(tree lost):1.5 (trees replaced) specified in Condition C8 of the approved Stage 1 SSDA.</p> |
| Landscaping  | <ul style="list-style-type: none"> <li>• Proposed rooftop landscaping needs to be suitably maintained</li> </ul>   | <p>As detailed in the amended Architectural Plans and Landscape Plans at <b>Appendices B and C</b>, the green edge on the roof has been replaced with pebbles installed in a visually interesting, artistic pattern.</p>  |

## 5.0 Updated Project Justification

Venues NSW has lodged a Modification Application to modify State Significant Development (SSD) Consent 9835 relating to the Stage 2 detailed design, construction, and operation of the Sydney Football Stadium (SFS) at 40-44 Driver Avenue, Moore Park. The proposed modifications seek to provide a new village community space, event plaza and multi-level car park to support the use of the SFS at the site of the current MP1 carpark.

The Modification Application was placed on public exhibition between 28 October 2021 and 24 November 2021. This Submissions Report has been prepared to satisfy the provisions of Section 4.39 of the EP&A Act and Clause 85A of the EP&A Regulation. Each of the submissions received during the public exhibition period have been collated, analysed and addressed in this Submissions Report.

In responding to and addressing the range of matters raised, as well as through further design progression, the proposal has undergone some minor design refinements pursuant to Clause 55AA of the EP&A Regulation. This Submissions Report has described and assessed the changes comprising the following:

- Simplification of the internal eastern and western carpark façades and the external southern and eastern façades by replacing the 'hit and miss' brickwork that was proposed up to the mezzanine slab edge with in-situ concrete planters with GRC planters, galvanized steel balustrades, perforated metal infills, and integrated crash barriers in-between columns.
- Replacement of the previously proposed stepping in the tennis club's brick clad fascia between columns with polished blockwork that is consistent with materials used in the stadium.
- Replacement of the previously proposed green planted edge roof on the tennis club with pebbles in an artistic pattern.
- Raising of the plaza level on the eastern concourse to accommodate existing underground services and maintaining the head height for outside broadcasting compound area, while separating ramps for pedestrians and vehicles with different gradients to maintain DDA compliance.
- Provision of fit-out details for the tennis club, while the remaining retail tenancies that form part of the Precinct Village will be subject to separate and future fit-out. The tennis club will comprise bathrooms, storage areas, administration areas, small indoor gathering space, and a kitchen to support the operation of the fitness facilities.

In line with the original Modification Application, no residual adverse environmental, social, or economic impacts have been identified as a result of the proposed amendments. Residual environmental impacts identified will be mitigated through the implementation of management measures for the construction and operational phases of the proposal. As such, the development as modified is considered to be justified for the following reasons:

- The proposed Precinct Village and Car Park relates to and delivers on the vision established in the Concept Proposal for the provision of a new stadium and associated public domain areas and is not inconsistent with the terms of the Concept Proposal and Stage 1 DA (SSD-9249) as modified;
- The proposal facilitates the vision of the Moore Park Masterplan 2040 to remove on grass parking on event days and deliver this space back to the general public for its intended recreational usage;
- The proposal's traffic and parking impacts can be appropriately managed and active transport will be promoted and encouraged, in accordance with the objectives of Transport for NSW;
- The proposal will provide publicly accessible open space, retail premises, and event spaces that are available to the public and include passive and active recreation opportunities. It presents a more landscaped and inviting interface to Moore Park and improves permeability through the precinct with new pedestrian routes that improve walkability, accessibility and safety.
- Upon its completion, the Precinct Village and Car Park proposal improves permeability through the precinct with new pedestrian routes that improve walkability, accessibility and safety.

- The proposed Precinct Village and Car Park will not result in significant new or adverse environmental impacts that cannot be mitigated, managed, or offset. It will also not undermine the achievement of sustainability initiatives or give rise to any adverse social or economic impacts.

Given the merits described above it is requested that the application be approved.

## Appendix A. Submissions Register & Updated Project Register

### Submissions Register

| Group         | Name   | Section where issue addressed |
|---------------|--|-------------------------------|
| Agencies      | <ul style="list-style-type: none"> <li>• DPIE</li> <li>• DPIE EESG</li> <li>• Heritage Council</li> <li>• Heritage NSW</li> <li>• NSW EPA</li> <li>• TfNSW</li> <li>• Sydney Water</li> </ul>  | Section 4.1                   |
| Councils      | <ul style="list-style-type: none"> <li>• City of Sydney Council</li> <li>• Randwick City Council</li> </ul>  | Section 4.1                   |
| Organisations | <ul style="list-style-type: none"> <li>• UTS / RA</li> <li>• Action for Public Transport (NSW)</li> <li>• The Paddington Society</li> <li>• Paddington Darlinghurst Community Group</li> </ul> | Section 4.2                   |
| Individuals   | <ul style="list-style-type: none"> <li>• Roberto Allen</li> <li>• Louise Falkov</li> <li>• Kevin Eadie</li> <li>• Selwyn Shapiro</li> <li>• 5 x anonymous</li> </ul>                           | Section 4.3                   |

### Updated project description

The following is a modified project summary table, with reference to the main components of the project as detailed in DPIE’s assessment of the Stage 2 SSD DA. It is noted that there has been negligible change to the exhibited description.

| Aspect                                    | Description  | Cumulative modified project   |
|---|--|---|
| Project summary                           | Stage 2 of the redevelopment of the SFS comprising the detailed design, construction, and operation of the new stadium with a basement carpark, associated public domain works within the site, reinstatement of the MP1 car park, landscaping, tree removal and associated infrastructure works.  | Stage 2 of the redevelopment of the SFS comprising the detailed design, construction, and operation of the new stadium with a basement carpark, associated public domain works within the site, provision of a new car park, provision of stadium fitness facilities, landscaping, tree removal and associated infrastructure works.  |
| Site area                                 | 8.7 hectares   | 8.9 hectares  |
| Development components of the new stadium | Design and construction of the new stadium within the building envelope as approved by the Concept Proposal, comprising: <ul style="list-style-type: none"> <li>• Up to 45,000 seats on four tiers of seating (Levels 1, 2, 3 and 4)</li> <li>• Additional 10,000 person capacity playing field in concert mode.</li> <li>• A basement level accommodating pedestrian and vehicular circulation zones, car parking spaces, facilities for teams/officials and media.</li> <li>• A pedestrian circulation zone at the ground (concourse level) within the stadium structure, food and beverage facilities, and services.</li> </ul> | Design and construction of the new stadium within the building envelope as approved by the Concept Proposal, comprising: <ul style="list-style-type: none"> <li>• Up to 45,000 seats on four tiers of seating (Levels 1, 2, 3 and 4)</li> <li>• Additional 10,000 person capacity playing field in concert mode.</li> <li>• A basement level accommodating pedestrian and vehicular circulation zones, car parking spaces, facilities for teams/officials and media.</li> <li>• A pedestrian circulation zone at the ground (concourse level) within the stadium structure, food and beverage facilities, and services.</li> <li>• A mezzanine level above the concourse level with operational areas.</li> </ul> |

| Aspect                              | Description   | Cumulative modified project  |
|-------------------------------------|---|--|
|                                     | <ul style="list-style-type: none"> <li>• A mezzanine level above the concourse level with operational areas.</li> <li>• Food and drink kiosks, corporate and media facilities, and other administration areas on the seating levels.</li> <li>• Roof cover over all permanent seats and a rectangular playing pitch.</li> <li>• Video replay/scoreboards on the northern and southern ends of the seating bowl.</li> <li>• Accessible terraces at various levels of the stadium.</li> </ul>   | <ul style="list-style-type: none"> <li>• Food and drink kiosks, corporate and media facilities, and other administration areas on the seating levels.</li> <li>• Roof cover over all permanent seats and a rectangular playing pitch.</li> <li>• Video replay/scoreboards on the northern and southern ends of the seating bowl.</li> <li>• Accessible terraces at various levels of the stadium.</li> </ul> <p>Design and construction of integrated Stadium Fitness Facilities at the basement level, ground level and podium level of the stadium.</p> <p>Design and staged construction of Precinct Village and Car Park including a supporting event plaza, Precinct Village above ground, and a 1,500 space car park beneath in place of the MP1 car park.</p> |
| Height                              | <ul style="list-style-type: none"> <li>• Maximum RL 85m (38.5m building height) on the east and west</li> <li>• Maximum RL 69.15m (22.5m building height) to the north and south.</li> </ul>  | <ul style="list-style-type: none"> <li>• Maximum RL 85m (38.5m building height) on the east and west</li> <li>• Maximum RL 69.15m (22.5m building height) to the north and south.</li> <li>• Maximum RL 55.65m for the Stadium Fitness Facilities</li> <li>• Maximum RL 56.5m for the Precinct Village and Car Park</li> </ul>   |
| Public domain areas within the site | <p>Removal of existing fences to Moore Park Road, removal of 9 trees and the construction and establishment of the public domain within the site, including:</p> <ul style="list-style-type: none"> <li>• A new public arrival plaza from Moore Park Road and public spaces with accessible connections to the stadium concourse.</li> <li>• Hard and soft landscaping works including planting of 117 new trees.</li> <li>• Three publicly accessible areas (event and non-event days).</li> <li>• Public art installation.</li> </ul> | <p>Removal of existing fences to Moore Park Road, removal of 46 trees and the construction and establishment of the public domain within the site, including:</p> <ul style="list-style-type: none"> <li>• A new public arrival plaza from Moore Park Road and public spaces with accessible connections to the stadium concourse.</li> <li>• New public arrival open space at Driver Avenue, with accessible connections to the stadium concourse via the Precinct Village and Car Park.</li> <li>• Hard and soft landscaping works including planting of 227 new trees.</li> <li>• Three publicly accessible areas (event and non-event days).</li> <li>• Public art installation.</li> </ul>  |
| Bulk earthworks                     | <ul style="list-style-type: none"> <li>• Bulk earthworks on the site with excavation required for basement and piling.</li> </ul>   | <ul style="list-style-type: none"> <li>• Bulk earthworks on the site with excavation required for basement and piling.</li> <li>• Bulk earthworks on the site with excavation required for the car park.</li> </ul>  |
| Signage                             | <ul style="list-style-type: none"> <li>• Four signage zones on the four facades of the stadium (each being 30m x 5m)</li> <li>• Wayfinding signage integrated with the public domain areas.</li> </ul>  | <ul style="list-style-type: none"> <li>• Four signage zones on the four facades of the stadium (each being 30m x 5m)</li> <li>• Wayfinding signage integrated with the public domain areas.</li> </ul>   |
| Vehicular access                    | <ul style="list-style-type: none"> <li>• Vehicular access to the site via the MP1 carpark with vehicle rejection facilities.</li> <li>• A ramp connecting to the new basement car park from the MP1.</li> <li>• Retention of the Paddington Lane access for emergency vehicles.</li> </ul>  | <ul style="list-style-type: none"> <li>• Vehicular access to the site via the car park with vehicle rejection facilities.</li> <li>• An additional egress point directly onto Moore Park Road to be used only for events</li> <li>• A ramp connecting to the new basement car park from the car park.</li> <li>• Retention of the Paddington Lane access for emergency vehicles.</li> </ul>  |

| Aspect                       | Description  | Cumulative modified project   |
|------------------------------|--|---|
| Pedestrian access            | <ul style="list-style-type: none"> <li>At-grade pedestrian access to the site from Moore Park Road.</li> <li>Pedestrian access to the site via stairs and two lifts from Driver Avenue.</li> <li>Provision of SO restricted basement parking spaces for use by staff/ hirers.</li> </ul>   | <ul style="list-style-type: none"> <li>At-grade pedestrian access to the site from Moore Park Road and Driver Avenue.</li> <li>Pedestrian access to the site via stairs and two lifts from Driver Avenue.</li> <li>Provision of SO restricted basement parking spaces for use by staff/ hirers and car park.</li> </ul>   |
| Car parking and loading bays | <ul style="list-style-type: none"> <li>Provision of three loading bays within the basement.</li> <li>Three spaces for outside broadcast vehicles</li> <li>Reinstatement of the MP1 car park and provision of 540 car spaces.</li> </ul>  | <ul style="list-style-type: none"> <li>Provision of three loading bays within the basement.</li> <li>Provision of five loading bays within the car park.</li> <li>Three spaces for outside broadcast vehicles.</li> <li>Replacement of the MP1 car park and provision of up to 1,500 car spaces.</li> </ul>   |
| Bicycle parking              | <ul style="list-style-type: none"> <li>Provision of 90 patron bicycle parking spaces fronting Moore Park Road.</li> <li>Provision of 50 bicycle parking spaces for staff members under the stairs adjacent to the MP 1 car park with end-of-trip facilities within the basement.</li> </ul>  | <ul style="list-style-type: none"> <li>Provision of 90 patron bicycle parking spaces fronting Moore Park Road.</li> <li>Provision of bicycle parking spaces for staff members under the stairs adjacent to the MP1 car park with end-of-trip facilities within the basement, for a minimum of 5% of full-time equivalent staff members.</li> </ul>  |
| Jobs                         | <ul style="list-style-type: none"> <li>Approximately 600 new full-time equivalent (FTE) jobs during construction.</li> <li>Approximately 300 FTE jobs at the stadium once the stadium is operational.</li> <li>Indirect employment of 346 part time equivalent jobs in hospitality, accommodation and entertainment industries.</li> </ul> | <ul style="list-style-type: none"> <li>Approximately 600 new full-time equivalent (FTE) jobs during construction, including additional jobs associated with the fitness facilities and Precinct Village and Car Park.</li> <li>Approximately 300 FTE jobs at the stadium once the stadium is operational, including additional jobs associated with the fitness facilities and Precinct Village and Car Park.</li> <li>Indirect employment of over 346 part time equivalent jobs in hospitality, accommodation and entertainment industries.</li> </ul> |