

17 January 2025

Our Ref: R/2018/4/O & R/219/2/P
File No: 2025/017115
Your Ref: SSD 9249-MOD-8 & SSD 9835-MOD-10

Katherine Klouda
Department of Planning, Housing and Infrastructure

via Major Projects Portal

Dear Katherine,

Advice on Modification – Sydney Football Stadium Stage 1 – SSD 9249-MOD-8 and Stage 2 (Design, Construction and Operation) – SSD 9835-Mod-10

Thank you for your correspondence dated 7 January 2025 inviting the City of Sydney (the City) to provide advice on the abovementioned modification application in relation to changes arising from the discovery of a shaft associated with Busby's Bore. This includes reconfiguration of the basement car park structure, removal of car parking spaces, reconfiguration of the Plaza and other design refinements across the site.

The City has reviewed the information provided and does not wish to raise an objection to the modifications proposed. Notwithstanding, we provide the following comments for consideration, some of which are to be addressed prior to determination.

Heritage

The heritage reports submitted with the modification indicate that consultation has been carried with Heritage NSW (HNSW) in dealing with the unexpected find and the best approach in dealing with Busby's Bore Spur. It is important that HNSW are afforded the opportunity to comment and give input into the design of the proposal and management of the archaeological resource.

The proposal is likely to have some impact on Busby's Bore Spur with a section of the shaft required to be removed for the car park. In the Construction Heritage Management Plan it is stated that if the tunnel which formed the spur of Busby's Bore is located during excavation, approximately 50m of it is likely to be removed between the start of the car park excavation and BBS-1.

Such likely removal highlights the importance of the preparation of a Heritage Interpretation Plan to help mitigate potential impacts to Busby's Bore as required by Condition B46 of SSD 9835. This should include an approach for use of any salvaged fabric of the bore in an interpretive display.

Landscaping

The proposed landscape design changes surrounding Busby's Bore spur line shaft position and playground are generally acceptable. The following design issues are to be clarified by amended landscape plans and report prior to determination:

- Shade is to be provided over the sand play area to ensure sun and UV protection and to make the sandpit usable in wet weather. It must be demonstrated that there is an adequate amount of shade to cover the majority of play activities.
- Confirmation of the location of formal and informal seating and area within the playspace for carers to interact and supervise. Ensure playspace seating provides various options to cater for a range of users (e.g. varied heights, back rests, arm rests).
- Map and signage for first time users is to be provided to assist with navigating and decision making in the play space.
- The playspace is to provide opportunities for a variety of age groups, multiple opportunities for people with limited mobility, and opportunities for intergenerational play.
- Equipment is to be challenging for multiple age groups and ability levels.
- Path surfaces are to provide sensory play opportunities through materiality or texture features.
- There is to be a sufficient boundary enclosure to provide a secure environment.
- Location of drinking water, bins, accessible toilet is to be confirmed.
- Confirmation that the pergolas in the south include supporting facilities such as BBQ facilities and accessible picnic table and seating.
- The northern lawn is to be natural turf. Noting the City does not support the use of synthetic turf due to the unsustainable artificial nature, a plastic grass surface finish does not contribute any biophilic or biodiversity outcomes and is likely to end up in landfill in the future.

Subject to clarification of the design issues outlined above and receipt of an amended set of plans, the proposed changes to Condition B12 could be supported from a landscape perspective.

Tree Management

The proposed modification does not include the removal of any further trees. City staff have undertaken a site inspection (on 9 January 2025) to inspect the trees outlined within the landscape plans provided to support MOD-10. Upon inspection, several irregularities were noted regarding trees present on-site. These are as follows:

- The tree retention and removal plan within the provided landscape plans DWG 21081_LA 101 Rev 5 outlines Tree 173 and 175 to be removed and replaced. These trees appear to have already been removed, with a crossover in the location of where the trees were located.
- The arborist's tree retention and removal plan and tree schedule outlines only two trees are present between Trees 149 and 306. The site inspection revealed there are three trees present in this location. There is one additional tree, a *Ficus rubiginosa* (Port Jackson Fig).

The submitted Arboricultural Impact Assessment (AIA) report does not assess any of the additional impacts from this modification. Section 4.1.5 of the report outlines "The trees should be protected in accordance with the Tree Protection Breiding dated 21.05.24" (sic). This Tree Protection Plan (TPP) has not been provided.

An updated AIA is to be provided that assesses any additional impact to the trees and recommends mitigation measures from the proposed modification. This should include an updated TPP, and if an update is not required, the aforementioned TPP should be provided for the City's records. The AIA is to also include the missing tree *Ficus rubiginosa* (Port Jackson Fig).

The submitted landscape plans also do not reflect the submitted architectural plans or potential impacts from MOD-10. The landscape plans are to be updated to include the Port Jackson Fig missing from the tree retention plan and tree schedule; as well as address:

- Several ramps and boardwalks have been reconfigured in size and location on the landscape plans that may increase encroachments to trees on site
- Grade changes are outlined around the perimeter that may impact the Tree Protection Zone (TPZ) of several trees.

An updated tree retention plan is required that accurately reflects trees that have been removed, the missing tree between trees 149 and 306, and whether it is to be retained. There is a tree proposed for planting in the location of the missing tree. It is to be confirmed that this location is still appropriate given the location of the missing tree. Documentation is to be provided showing approval for the removal of trees 173 and 175.

Public Domain

Flood planning level requirements per the City's floodplain management policy can be achieved with a minor non-compliance, identified at the loading zone where the proposed design crest level is 42.2m AHD (equating to a freeboard of only 0.48m). The crest level is to be increased to achieve the minimum freeboard. This non-compliance must be addressed prior to determination.

Access and Transport

The proposal seeks a small reduction in the number of car parking spaces within the approved parking facility, which is supported by the City. It is recommended that the approved maximum capacity be reduced to from 1,500 to 1,350 as part of this application to prevent the additional capacity from being provided at a later stage. The precinct is well serviced by public transport, and alternatives to driving must be encouraged and prioritised.

Contamination

The proposed modification seeks approval to increase depth in excavation and a geotechnical report has been provided. The City requests a contamination advice letter from a consultant (similar to that submitted for MOD-7) confirming that the proposed modifications are not anticipated to pose a concern and that the contamination framework within the existing consent remains appropriate for managing unexpected finds.

Should you wish to speak with a Council officer about the above, please contact Jessica Symons, Senior Planner, on 9265 9333 or at jsymons@cityofsydney.nsw.gov.au

Yours sincerely,



CHRISTOPHER CORRADI
Area Planning Manager