TABLE 1
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Item	Document	Page Number	Section / Subject	SOPA Comment
1	EIS (SDD-35283699)	23	2.3.5 Topography	The site is "25.7m above sea level" and has an "approximate fall of 3m in all directions". Clarify/confirm that the 25.7m ground level is at the highest point of the site.
2	EIS (SDD-35283699)	27	3.1 Overview of the proposal	Building Height RLs are provided without reference to building Ground Floor RLs or the 149m height limit. EIS Site Description - Topography 2.3.5 has the site at RL 25.7m with "an approximate fall of 3m…".
3	EIS (SDD-35283699)	27	3.1 Overview of the proposal	Figure 3-1 shows the podium for Building 2 extending further north than the podium for Building 1 which does not align with Figure 3-2 or Figure 3-3.
4	EIS (SDD-35283699)	31	3.5 Pedestrian access and connectivity	Pedestrian access to the Metro station during event mode is not mentioned in the text (though is included on the Figure 3-3 diagram). How does the large area of 'Station Lobby" work in event mode? Can some of this area have a function in non-event mode to make use of dead floor space and activate the two frontages?
5	EIS (SDD-35283699)	33	3.6 Vehicular access and parking	Bicycle Parking: There may be safety concerns regarding the bicycle parking and end-of-trip facilities located on Level 3 being accessed via the loading dock of Building 1 as indicated. (Ref. Scheme Sheet 13). Where will Metro bicycle parking be located? Buildings 2 & 3 residential bicycle parking is undersized, and access appears to be problematic - via Building 3 apartment lift lobbies? (Ref. Scheme Sheet 17). No. Please outline further how this will all work safely and be sized and accessed appropriately.
6	EIS (SDD-35283699)	37	3.9 Interface levels	The staging of the SSD Public Domain Scope area in relation to the other areas of public domain is unclear, particularly around the station entrances (Figure 3-8). Please clarify further.
8	EIS (SDD-35283699)	57	6.2 Built form and urban design	6.2.2 Tower Elements - "The Building 1 tower setbacks vary and include a 2.5m primary setback and nil secondary setback to Precinct Street B (due to structural requirements)". The extent of tower within this 2.5m setback has previously been questioned, specifically the areas of amenities and corridor located within the setback. Note that the SOP Master Plan (2.4.5 Setbacks) states that "a 2.5m protrusion into secondary setback is permissible only for tower core, bracing and structural requirements." Also, it is stated that "Building 3 will have a maximum height of 45 storeys (RL 171.00)...". Building height and final ground RLs require clarification.
9	EIS (SDD-35283699)	58	6.3.1 Residential amenity	Visual privacy - "A minimum of 24m is proposed between the proposed buildings and adjacent sites" (Site 48 and Site 46)". Can this be achieved between the Building 1 tower (built to boundary) and tower envelopes proposed for Site 48?
10	EIS (SDD-35283699)	70	6.4 Visual impact	The visual impact of the proposal from within the precinct, and/or from street level, should also be considered. For example, the street level view towards Building 1 from Olympic Boulevard and the western end of Figtree Drive is to a visually dominant corner and building elevation. The reference scheme shows an inactivated street corner at ground level (switch room; water meters; fire cupboards). The very exposed 18m high wall of station plant is exacerbated by the length of tower "core" built to the boundary.
11	EIS (SDD-35283699)	73	6.5 Public space	Discrepancy between width of main open space (Figure 6-14) and Reference Scheme Site Plan (Sheet 03) which indicates reduced width of park. Site 40 building envelope and Site 7 Building 1 podium should align.

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12	EIS (SDD-35283699)	58	Figure 6-1 Proposed building heights	Figure 6-1 does not show the proposed height of buildings as the Ground Level RL is not provided (in any of the EIS documentation including the Appendix G building envelope set). The Ground Level RL in relation to the Site RLs require clarification.
13	EIS (SDD-35283699)	75	Figure 6-14 Public domain demarcation plan	Site 40 Metro building envelope and width of adjacent park differs on Reference Scheme Site Plan.
14	EIS (SDD-35283699)	84	Figure 6-16 Access and egress routes for cyclists	Refer to comments on EIS 3.6
15	EIS (SDD-35283699)	69	6.3.4 / Reflectivity	The EIS does not address impacts of building reflectivity to flying wildlife, particularly birds and bats. Death and injury to wildlife due to collision with buildings is a frequent occurrence at Sydney Olympic Park, and new buildings should be designed to reduce this risk. **Recommended Condition of Consent:** ***Detailed building design must incorporate bird friendly design features that reduce risk of birdstrike.*** Comprehensive guidelines and building standards have been developed in Canada and USA to mitigate the risk of wildlife collision with buildings and should be applied to detailed building design. Further information is available at: Bird Friendly (nyc.gov) Bird-Friendly Best Practices Glass (toronto.ca) Bird-Safe Design and Standards – BirdSafe Buildings kill millions of birds. Here's how to reduce the toll (commercialrealestate.com.au)
16	EIS (SDD-35283699)	60	'Lighting'	The EIS does not address impacts of lightspill on nocturnal wildlife. Lightspill should be minimised through to use of focused, downward facing lights as per SOPA's Green Star Credit Commitment. **Recommended Condition of Consent:** ***As per SOPA's Green Star Credit Commitment, 95% (by number) of all external public lighting luminaries within the project site boundary must have an Upward Light Output Ratio of less than 5%.***
17	Appendix E: Build Form and Urban Design Report	7	1.2 / Development Summary	Figure 2 shows the podium for Building 2 extending further north than the podium for Building 1 which does not align with Figure 3-2 or Figure 3-3 nor the SOP Master plan Interim Review. This figure is used in other sections of the report and other appendices and is not compliant
18	Appendix E: Build Form and Urban Design Report	23	2.10 / Pedestrian Movement and Cycling	Figure 12 Pedestrian Movement - the diagram misrepresents the pedestrian connection to the area south of Figtree Drive, which should connect with the alignments of Precinct Streets A & B. This is an important planning consideration in regard to the interface of Site 47, Figtree Drive and areas to the south.
19	Appendix E: Build Form and Urban Design Report	41	4.3 / Ground Floor Plan	Figure 37 shows extent of non-residential and street activation at ground level for Buildings 2 & 3, but not for Building 1. The SOP Master Plan Interim Review controls require primary activated edges along the Building 1 promenade and frontage to Miluni plaza with secondary activated edges on Figtree Drive.

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20	Appendix E: Build Form and Urban Design Report	50	5.3 / Ground Plane and Public Domain	Active Frontages (SOP MP 2.4.9) - 1. Significant area of Station interface is inactive when not in event mode. Can some of this area have a function in non-event mode to make use of dead floor space and activate some of the two frontages? 2. Will the commercial ground floor frontage to the 'promenade" and lane be activated? 3. The inactivated south-west corner and length of facade is in a highly visible location.
21	Appendix H: Indicative Reference Scheme	2	Location Plan	The Context Plan indicates potential issue with the connection of Precinct Road B across Figtree Drive to the station plaza. Refer to comments Sheet 09.
22	Appendix H: Indicative Reference Scheme	3	Site Plan	Building 1 tower envelope (with western envelope built to boundary) is significantly closer to the Site 48 tower than the minimum 24m separation proposed in the EIS (page 59, Residential Amenity). The Site 40 Metro Building footprint is larger (and park narrower) than in SOPA Master Plan. This needs to be amended so as to not lose green open space for residents.
23	Appendix H: Indicative Reference Scheme	4	Site Section 01 N-S	Site 40 Metro Building - extent of station services envelope above the two storey height limit to be defined.
24	Appendix H: Indicative Reference Scheme	5	Site Section 02 N-S	Building Height RL 171.0 provided but not Ground Floor RL (nor in the Building Envelope Set of drawings). Ground Level given as 25.7m in EIS (page 23, Topography). Ground Level RL indicated in Building Envelope Set is presumably RL 22.0 (i.e.: Podium RL minus 18,000 podium height). Building height requires clarification.
25	Appendix H: Indicative Reference Scheme	7	Site Section 02 E-W	Shows Building 1 tower envelope built to boundary less than 20m from the Site 48 tower for its full length. Refer to comment above.
26	Appendix H: Indicative Reference Scheme	9	Ground Floor Plan (Bldg 1)	Precinct Street B - Potentially poor street/pedestrian connection across Figtree Drive (crossing bus lanes) and past the dual loading bays and angled loading access road. Visually dominant south corner and end of west elevation dominated by services and plant. Inactivated south street corner (at ground level). Intermittent activation of both sides of Lane/"Promenade". Also inactivated frontage to Metro Plaza and significant length of lane when not in event mode. (Refer to SOP MP 2.4.9 Activate Frontages). How does the large area of 'Station Lobby" work in event mode? Can some of this area have a function in non-event mode to make use of dead floor space and activate the two frontages?
27	Appendix H: Indicative Reference Scheme	13	Level 03 Floor Plan	Bicycle Parking and EOT - Is access to Level 3 via a lift requiring travel thru the ground floor Loading Area acceptable. (Where will Metro bicycle parking be located?).
28	Appendix H: Indicative Reference Scheme	14	Typical Tower Level	How much of the tower "core" protrusion to the boundary on the south-west façade is "tower core, bracing and structural requirements"? (SOP MP 2.4.5 Setbacks). Please clarify if the desire for a 1500 sq metre commercial floor plate has determined the envelope of the building on this site.
29	Appendix H: Indicative Reference Scheme	17	Basement 01 (Bldg 2 & 3)	Bicycle Parking requires clarification - Is the area for cycle parking and EOT adequate? Is this for Commercial only or for residential as well? Is the access for commercial parking via lobby lifts appropriate?

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30	Appendix H: Indicative Reference Scheme	18	Ground Floor Plan (Blgs 2 & 3)	Lanes - Does the "promenade" comply with Activation of Laneways (SOP 1.3.8) which stipulates: "Activated frontages on two parallel edges"; "Blank walls should be avoided"; and "Provide cycle parking and cycle share facilities in immediate surrounds"? How can it be ensured that the area of Commercial fronting the Promenade and Plaza at ground level will be activated? Precinct Street A does not appear to "provide limited short-term parking for delivery / drop-off" or for "EV charging" (SOP 1.3.7).
31	Appendix N: CPTED Report	11	4	The report states "building layouts not creating blind spots or concealment opportunities noting it is mainly in block planning stage and therefore it is important this concept is maintained through the subsequent design stages" This is incongruous with the layouts proposed within Appendix E Built Form and Urban Design Report, particularly Figure 45, and Appendix H Reference Scheme Sheet 09, which shows an OSD and Metro outdoor lobby that is concealed from any street or natural desire line for pedestrian movements other than to/from this entry. Consideration will need to be given as to how this space is passively surveilled outside of the operations of the Metro station and/or the surround retail uses and the planting and street furniture within the Fig Tree Drive Entry Plaza will need to allow for views from Figtree Drive to the outdoor lobby.
32	Appendix N: CPTED Report	14	5	As above, statement "Ensure all building layouts in the precinct are not creating blind spots or concealment opportunities." is incompatible with the ground plane layout currently proposed within Appendix E and H.
33	Appendix P: Reflectivity Report	25	All	Appendix P: Reflectivity Report does not address impacts of building reflectivity to flying wildlife, particularly birds and bats. Death and injury to wildlife due to collision with buildings is a frequent occurrence at Sydney Olympic Park, and new buildings should be designed to reduce this risk. The report notes that the EIS assessment is based on the concept design and: “As such, future design work will most likely alter the built-form, materiality, and surrounding features, in terms of shielding, of the site. Therefore, design improvements can be included to further mitigate areas of the concept design which have the potential for glare impacts to occur.” (Section 4.5 / Next Steps). **Recommend Condition of Consent: A Building Impact Reflectivity Assessment is prepared for EIS’s for building construction. This assessment is to consider reflectivity impacts to birds and bats, and the measures incorporated into building design to reduce risk of wildlife collision. The report is to be prepared or endorsed by an ecologist experienced in bird ecology.** Comprehensive guidelines and building standards have been developed in Canada and USA to mitigate the risk of wildlife collision with buildings and should be applied to detailed building design. Further information is available at: Bird Friendly (nyc.gov) Bird-Friendly Best Practices Glass (toronto.ca) Bird-Safe Design and Standards – BirdSafe Buildings kill millions of birds. Here's how to reduce the toll (commercialrealestate.com.au)
34	Append X: Integrated Water Management Report	23	Table 4-8 / Stormwater filter cartridge – MUSIC input parameters	MUSIC calculations appear to have been based on typical urban runoff data and not on the local water quality data, as there were no mention or references. MUSIC calculations should be made with local water quality data.

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35	Append X: Integrated Water Management Report	24	Table 4-10 Bio-retention basin – MUSIC input parameter	MUSIC calculations appear to have been based on typical data, assuming the ability of such basins (rain gardens) to remove pollutants while the trees/sedges are growing well. But given three tall buildings on the development site, two tall buildings in the nearby site and also more are likely within 100m radius, the shadows are supposed to diminish the ability of such trees/sedges to grow well. The reduced growth must be diminishing the pollution reduction capacity. It is not clear if the MUSIC calculations have considered reduced level of pollution reduction performance and, hence whether still meeting the SOPA WSUD Guidelines. Detailed Integrated Water Management Report should (a) take into consideration projections from Detailed Shadow Impact Report regarding MUSIC calculations for Bio-retention basins (b) align with SOPA WSUD Guidelines.
36	Appendix Z: Contamination Report	7	3.4 / Construction works for proposed development	States that " During excavation, groundwater dewatering would occur, and groundwater would be extracted, tested and treated as required, prior to being disposed." Given the expected change in groundwater direction towards the excavation box the potential for landfill leachate to migrate into the excavation must be addressed. In accordance with the POEO Act and Waste Regulation landfill leachate cannot be dewatered to stormwater or receiving waters. It must be contained and transferred to a facility that can lawfully receive that waste. The distinction between contaminated groundwater and landfill leachate should be made with clear requirement to identify and manage leachate and/or seek approval from the NSW EPA as the Regulatory Authority for alternative options under an Environment Protection License that would be issued for the works.
37	Appendix Z: Contamination Report	10	3.5.6 / Hydrogeology	States that with the development "the excavation is assessed to act as a groundwater sink, causing groundwater to flow towards the Concept SSDA site" Again, regardless of the chemical composition, the POEO Waste Regulation do not permit discharge of leachates. This needs to be clearly addressed.
38	Appendix Z: Contamination Report	11	3.5.7 / Hazardous ground gases	In relation to hazardous ground gases the report must acknowledge upfront the potential increase in gas that could directly result from the groundwater sink and possible the gas intrusion risk.
39	Appendix Z: Contamination Report	19	Table 3-4 / Areas of environmental interest	AEI-30 - In relation to vapours and ground gases, it should be recognised that the change in groundwater direction may specifically increase ground gases within the landfill. Theses may migrate into the area of the development however the risk to the public of gas migrating to the surface of the landfill as a direct result of the METRO project should not be ignored. All risks as a direct result of the project must be addressed. Existing gas mitigation infrastructure was installed as part of the 2000 remediation may not be adequate to manage this increased landfill gas generation that may result.
40	Appendix Z: Contamination Report	20	Table 3-4 / Areas of environmental interest	Information is not quite correct. AEI - 31 Aquatic Centre Landfill is a dry tomb construction with leak detection. Potential for contaminated groundwater migration from AEI 31 to be present at depth within the Concept SSDA site is low. However, he site was remediated not cleaned up and therefore some residual contamination may be present outside the waste cells and this may present some, although low risk. The information should be amended to more accurately reflect the information.

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41	Appendix Z: Contamination Report	23	3.9.2 / Hazardous ground gases	States that " Based on the review of data from ERM (2022), the chance of encountering HGG concentrations exceeding the human and the ecological criteria (NEPM 1999) within the Concept SSDA site is considered low. Further investigation and monitoring of HGG should be considered for both the construction and operational phases of the proposed development." However, landfill gas consequence can be high particularly within explosive range. The report should include consideration of consequence to human health and environment.
42	Appendix Z: Contamination Report	23	3.9.4 / Groundwater	Again, this section does not attempt to distinguish potential contaminated groundwater from leachate and the different regulatory requirements that apply.
43	Appendix Z: Contamination Report	24	4 / Conclusion	States " In accordance with State Environmental Planning Policy (Resilience and Hazards) 2021, it is likely that the Concept SSDA site can be made suitable for its proposed use, following the completion of any remediation works required." Given the potential consequence of increased landfill gas generation and /or ingress into the development, consideration should be given to ensuring procedures for monitoring landfill gas are put in place during construction and post construction both within the area of the SSDA and the SOPA Remediated Lands to ensure landfill gas risks are identified and appropriately managed. **Recommend Condition of Consent: Prior to commencement of construction the proponent must develop and implement a Hazardous Ground Gases Monitoring Plan to (a) monitor, assess and respond to any landfill gas ingress into the area of SSDA and (b) monitor, assess and respond to the impact of the works on changes in landfill gas generation rates and flow within the Former Golf Driving Range Landfill. The HGG plan to be prepared in consultation with SOPA for the review and approval of an accredited NSW EPA Site Auditor. A copy to be provided to the NSW EPA.**