

**Request for Secretary's  
Environmental Assessment Requirements**

**Sydney Opera House Building Renewal  
Joan Sutherland Theatre Accessibility and  
Additional Works and Front of House Works**



**Prepared for the Sydney Opera House**

**May 2016**

## Table of contents

<b>1</b>	<b>Introduction .....</b>	<b>5</b>
<b>2</b>	<b>The site and locality .....</b>	<b>6</b>
<b>3</b>	<b>The Project.....</b>	<b>8</b>
3.1	Sydney Opera House Building Renewal Program .....	8
3.2	Project description .....	9
<b>4</b>	<b>Relevant Legislation .....</b>	<b>12</b>
4.1	Environmental Planning and Assessment Act 1979.....	12
4.2	Heritage Act 1977 .....	12
4.3	Environment Protection and Biodiversity Conservation Act 1999 .....	12
4.4	Environmental Planning Instruments .....	14
<b>5</b>	<b>Key Strategic Plans and Documents.....</b>	<b>16</b>
5.1	NSW Making it Happen .....	16
5.2	State Infrastructure Strategy.....	16
5.3	A Plan for Growing Sydney.....	16
5.4	Sydney Opera House Plans and Policies .....	17
<b>6</b>	<b>Potential Environmental Issues .....</b>	<b>19</b>
6.1	Heritage .....	19
6.2	Built form and visual impact .....	19
6.3	Transport, traffic and accessibility .....	19
6.4	Natural environment.....	20
6.5	Building Code of Australia .....	20
6.6	Construction management .....	20
<b>7</b>	<b>Conclusion .....</b>	<b>21</b>

## Figures

Figure 1	Location Map
Figure 2	Sydney Opera House Site Plan
Figure 3	Sydney Opera House [source: Sydney Opera House
Figure 4	Proposed new slot window along eastern facade
Figure 5	Indicative upgrades to Under the Steps
Figure 6	Sydney Opera House World Heritage Listing

## Tables

Table 1	JST accessibility and additional works
Table 2	Front of House works

*Front Cover Image courtesy of Sydney Opera House*

## Contact

### **Dan Keary Urban Planning Pty Ltd**

**A Level 2, 37-39 The Corso, Manly NSW 2095**  
**P 0429 565 291**  
**E [dan@kearyurbanplanning.com.au](mailto:dan@kearyurbanplanning.com.au)**  
**ABN 94 609 041 170 ACN 609 041 170**

### **michael woodland consulting pty ltd** **policy | planning | advice**

Level 2  
37-39 The Corso  
MANLY NSW 2095

M 0448 726 214  
E [michael@michaelwoodlandconsulting.com.au](mailto:michael@michaelwoodlandconsulting.com.au)  
ABN: 56 166 274 835 | ACN: 166 274 835

All Rights Reserved. No material may be reproduced without prior permission of Dan Keary Urban Planning Pty Ltd and Michael Woodland Consulting Pty Ltd. While Dan Keary Urban Planning Pty Ltd and Michael Woodland Consulting Pty Ltd working on this project has tried to ensure the accuracy of the information in this publication, it accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report. This report has relied on information provided by the Sydney Opera House in good faith and accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report.

## 1 Introduction

The purpose of this report is to provide a preliminary environmental assessment of certain works proposed under the Joan Sutherland Theatre Combined Projects, which form part of the Sydney Opera House Building Renewal Program.

It is proposed to lodge a development application for the following works under section 89E of the *Environmental Planning and Assessment Act 1979* [EP&A Act]:

- Joan Sutherland Theatre [JST] accessibility and additional works – comprising various accessibility works, acoustic upgrade works, lighting upgrades, office relocation and back of house works; and
- Front of House works – comprising new function centre and removal of the marquee from the Northern Boardwalk, refurbishment of the entry foyers and “under the steps” upgrade works to the vehicle concourse area.

This report supports an application to the Department of Planning and Environment [DP&E] requesting the proposal be assessed as State significant development [SSD] under the provisions of the *State Environmental Planning Policy [State and Regional Development] 2011* [SRD SEPP] and that DP&E issue the Secretary’s Environmental Assessment Requirements [SEARs] under section 78A[8A] of the EP&A Act and Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* [EPAR] to enable the preparation of an Environmental Impact Statement [EIS] for the project.

It is noted that certain other works proposed as part of the JST accessibility and additional works, including acoustic upgrades, auditorium lighting replacement and new surtitles, would be carried out as *exempt development* in accordance with the provisions of *State Environmental Planning Policy [State Significant Precincts] 2005* [SSP SEPP] and, therefore, do not form part of this request for SEARs.

## 2 The site and locality

The Sydney Opera House is located on the peninsular on the eastern side of Circular Quay known as Bennelong Point, as shown in Figure 1. The site is legally described as Lot 5 in DP 775888 and Lot 4 in DP 787933.



**Figure 1:** Location Map [Source: SixMaps]

The Opera House comprises three main structures, being:

- The Concert Hall on the western side of Bennelong Point;
- The Opera Theatre [Joan Sutherland Theatre] on the eastern side; and
- The Bennelong Restaurant, to the south of the two venues.

To the south of the above three structures are the main podium steps and the southern forecourt. The Opera House precinct adjoins the Royal Botanic Gardens to the east and East Circular Quay to the south.

The Opera House is listed on the NSW State Heritage Register and the National and World Heritage Lists [further discussed in Section 4.3 below]. It is the Nation's premier tourist attraction, hosting more than 8 million visitors each year, with more than 1.4 million attending about 1,900 performances and more than 350,000 people taking a guided tour of the building.

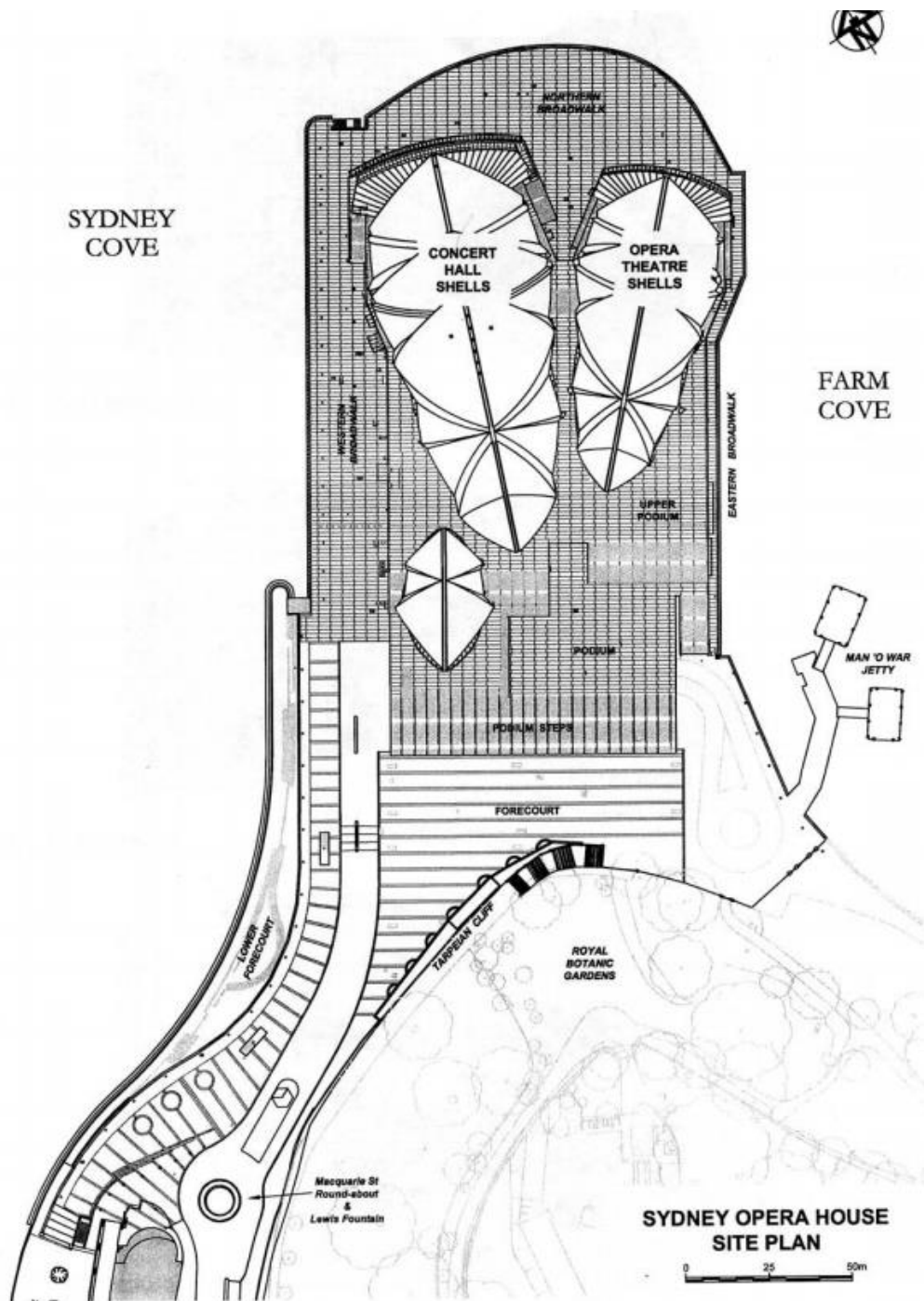


Figure 2: Sydney Opera House Site Plan [source: Sydney Opera House Conservation Management Plan]



## 3 The Project

### 3.1 Sydney Opera House Building Renewal Program

The Sydney Opera House Trust [SOHT] has developed a Building Renewal Program to guide the transformation of the building over the next decade and which includes a range of works aimed at maximising the Opera House's economic and cultural contribution to NSW and Australia as the nation's premier tourist destination and one of the world's pre-eminent performing arts centres.

It is also aimed at improving the operational efficiency of the building and ensuring compliance with modern building, accessibility and work health and safety [WH&S] requirements. The Renewal Program works will support the evolution of the Sydney Opera House as a key element of the overall renewal process in preparation for the building's 50<sup>th</sup> birthday in 2023.

The JST Combined Projects are a key component of the Building Renewal Program. The JST Combined Projects comprise a number of works packages, including:

- **Theatre Machinery Project [TMP] works** – involving replacement of end of life equipment and elimination of safety hazards. These works generally comprise SSD and are being progressed through a separate request for SEARs
- During the JST closure period for the TMP works to be undertaken [estimated mid to late 2017], SOHT is considering carrying out other works simultaneously in order to make the most efficient use of the closure including:
  - **JST accessibility and additional works** – comprising various accessibility works, acoustic upgrade works, lighting upgrades, office relocation and back of house works; and
  - **Front of House works** – comprising new function centre and removal of the marquee from the Northern Boardwalk, refurbishment of the entry foyers and "under the steps" upgrade works to the vehicle concourse area.

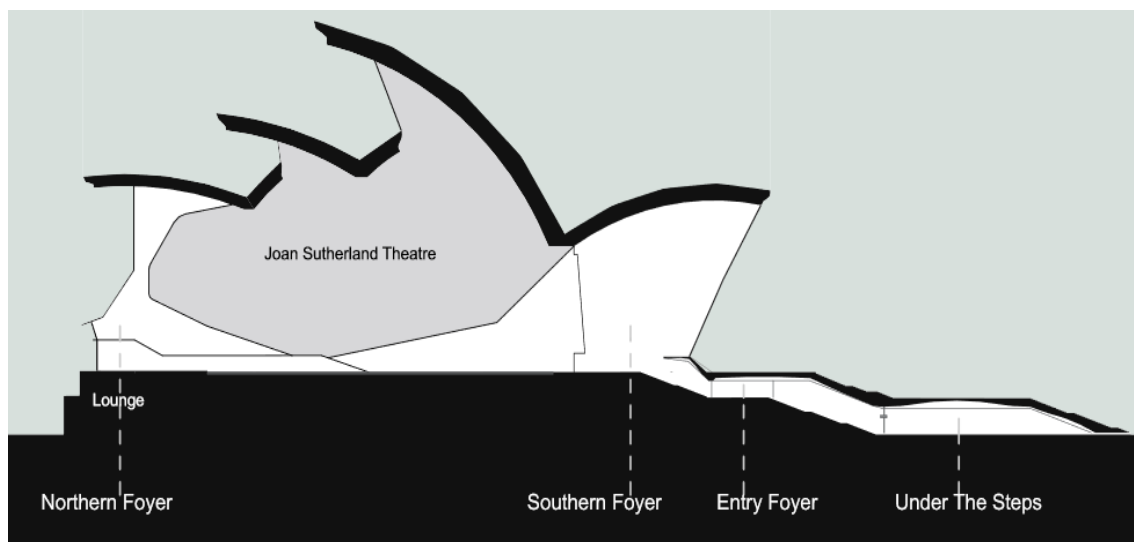


Figure 3: Sydney Opera House [source: Sydney Opera House / TZG Architects]



## 3.2 Project description

This SEARs request relates to the JST accessibility and additional works and Front of House works, as these are not considered to be *exempt development* and are therefore SSD [Section 4.4] as described below.

It is proposed to progress the JST accessibility and additional works and Front of House works as a single development application [DA] and the request for SEARs is made on this basis. However, due to the detailed nature of the works, the SOHT is continuing to assess the most appropriate approval pathway for these proposed works, including:

- (a) Whether some elements may meet the exempt development categories of the SSP SEPP; and
- (b) The appropriateness of decoupling some elements into a separate DA/s.

Should the scope of works outlined in Tables 1 and 2 below change as a result of this ongoing review process, DP&E will be consulted prior to the lodgement of the relevant DAs to confirm the process and the applicability of the SEARs.

<b>JST accessibility and additional works</b>	
<b>Accessibility projects</b>	<p><i>A range of accessibility upgrades including:</i></p> <ul style="list-style-type: none"> <li><i>Accessibility seating upgrades in rows A, B, &amp; C and M, N, &amp; P</i></li> <li><i>New lift core 31 to provide access to the multiple levels in the northern foyers, not currently served by a lift.</i></li> <li><i>Sanitary Facilities Upgrade [East/West]</i></li> <li><i>Dressing Room Upgrade to provide two accessible dressing rooms for performers</i></li> <li><i>Orchestra accessible access upgrade – widening of a staircase and installation of a wheelchair lift, and widening of existing doorways.</i></li> <li><i>Addition of passageways linking the southern foyers to the northern foyers on Levels 2 and 3, providing wheelchair access to northern foyer bars and accessible toilets.</i></li> </ul>
<b>Control room upgrade</b>	<p><i>Upgrades to make the control room spaces functional and ergonomic and to provide infrastructure to support audio, lighting, video and projection operation in all rooms. For all control rooms this means:</i></p> <ul style="list-style-type: none"> <li><i>Remove carpeted floors and install hardwood flooring or similar to improve appearance, cleanliness.</i></li> <li><i>Provide floor traps for temporary cabling to remove trip hazards and improve appearance.</i></li> <li><i>Provide height adjustable work benches with underside equipment racking where appropriate</i></li> <li><i>Improve lighting for general work and show states</i></li> <li><i>Improve wall finishes and acoustics.</i></li> </ul>
<b>New access from stage to the auditorium</b>	<p><i>Works to provide a means of access between the auditorium and the stage, including proposed stairs to access the eastern side of the stage, designed for quick deployment by SOH staff, to enable an individual to travel from stage to auditorium (during rehearsals) and from auditorium to stage (during curtain calls).</i></p>
<b>New follow-spot room</b>	<p><i>Construction of a new follow spot room to provide the operator with acceptable working conditions, and provide the correct angles for the spotlight to reach the back of stage. The new follow spot room is proposed at the rear of the auditorium, to provide the appropriate angle of light beam to reach the very rear of the stage.</i></p>
<b>Seat refurbishment</b>	<p><i>Refurbishment or renewal of the JST auditorium seating in order to provide improved fire rating of the seats. There are three options being considered for the seat refurbishment works:</i></p> <ol style="list-style-type: none"> <li><i>Reuse of metal parts [replacing only worn and broken items], refurbishment of plywood / veneer parts, and renewal of upholstery to achieve enhanced fire</i></li> </ol>

JST accessibility and additional works	
	<p>rating.</p> <ol style="list-style-type: none"> <li>Reuse of metal parts [replacing only worn and broken items], renewal of plywood / veneer parts and upholstery to achieve enhanced fire rating.</li> <li>Renewal of the complete seat</li> </ol> <p>In addition, the condition of the existing brushbox timber floor will be assessed, and subject to funding and necessity, a further option to re-finish the floor will be investigated.</p>
<b>Theatre &amp; Events Offices</b>	<p>The Theatre &amp; Events teams will be re-located over two levels in the current JST winch power and dimmer rooms, which will become available following the implementation of the TMP works.</p> <p>Creation of new slot window along the eastern façade to provide natural light and amenity for the relocated offices. Refer Figure 3.</p>
<b>Alterations to Fire Curtain</b>	<p>Alterations to existing fire curtain over stage due to its age. Options being considered include:</p> <ul style="list-style-type: none"> <li>removal of the existing “flap” that covers the gap between stage and auditorium.</li> <li>replacement of the existing iron curtain with a new lightweight fabric curtain.</li> </ul>

Table 1: JST accessibility and additional works

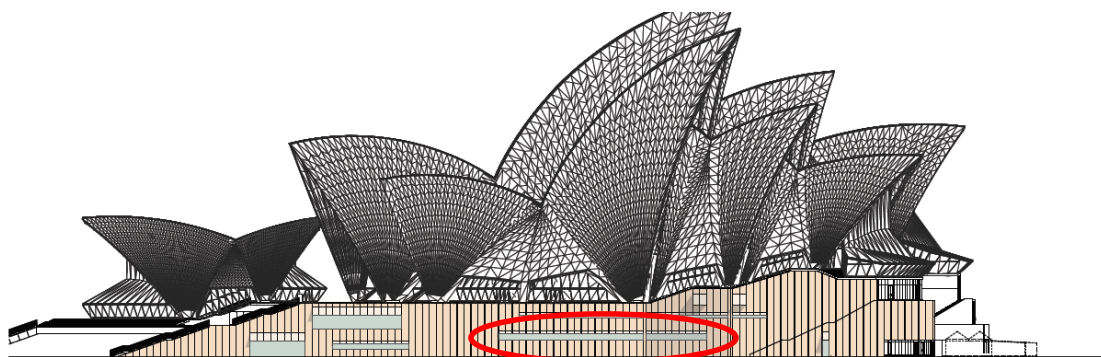


Figure 4: Proposed new slot window along Eastern Façade [Source: Sydney Opera House / TZG Architects]

Front of House works	
<b>Entry Foyer</b>	<p>Refurbishment of the Entry Foyer including:</p> <ul style="list-style-type: none"> <li>Reconfiguring the existing amenities including cloak, ticketing, seating, café, and merchandise shop to create more spacious circulation zones and better disabled access to all areas.</li> <li>Upgrading the traditional box office with contemporary customer-focused counter processing facilities.</li> <li>Provision of a new lift from the Box Office Entry Foyer on Level 1 to the JST Southern Foyer on Level 2.</li> </ul> <p>Refer Figure 4</p>
<b>Function Centre</b>	<p>Creation of a new Function Centre at the northern end of the eastern side of the building to provide new and enhanced business opportunities.</p> <p>Removal of the existing marquee to open up the Northern Broadwalk for greater public access and use. Refer Figures 5 and 6.</p>
<b>Under the Steps [vehicle concourse]</b>	<p>Redefinition of this space as a primarily pedestrian space through improvements to its overall appearance including lighting, furniture, interpretive elements, signage and the removal of non-essential vehicle movements. Refer Figures 7 and 8.</p>

Table 2: Front of House works

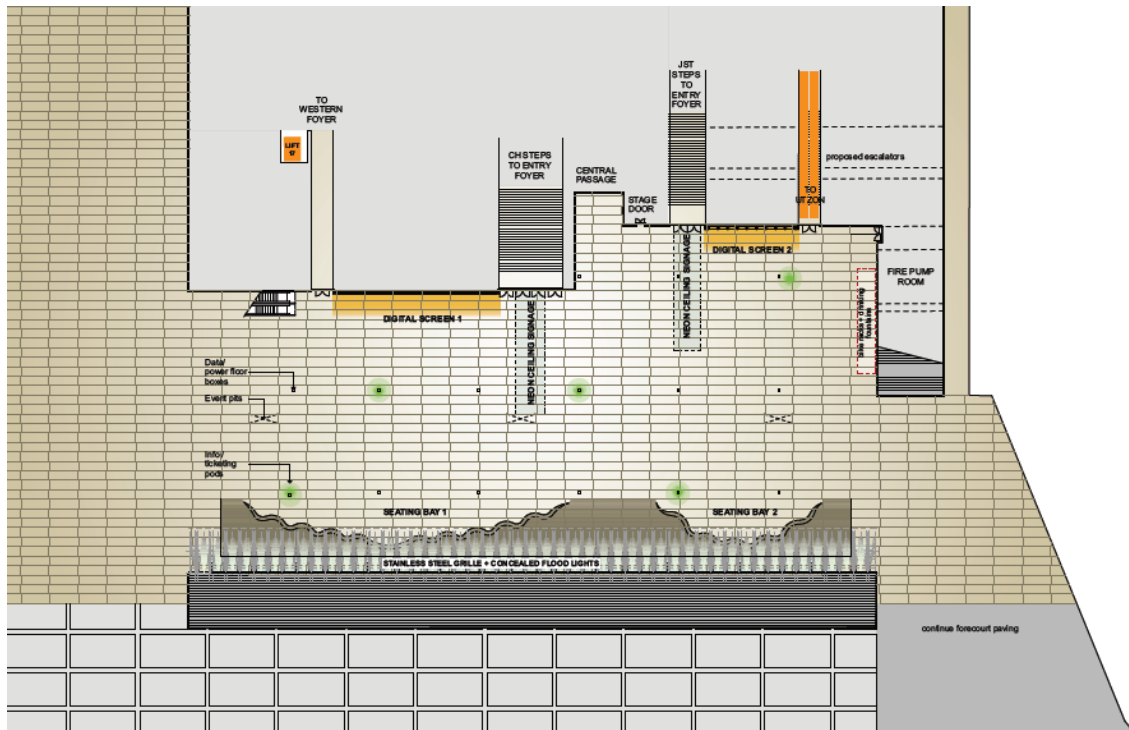


Figure 5: Indicative upgrades to Under the Steps [Source: Sydney Opera House / TZG Architects]

## 4 Relevant Legislation

### 4.1 Environmental Planning and Assessment Act 1979

The EP&A Act provides the statutory framework for planning in NSW. Section 89C of the EP&A Act enables certain developments to be declared SSD by means of a State Environmental Planning Policy [SEPP] or by order of the Minister for Planning.

The project is SSD as Clause 1 of Schedule 2 of the SRD SEPP states that all development on land identified as being within the Sydney Opera House site is SSD. Based on the review process to date, it is considered that the proposed works described in this report do not meet the exempt development categories of the SSP SEPP [see Section 4.4.2] they are considered to be SSD.

The project will be assessed under Part 4 Division 4.1 of the EP&A Act. The Minister for Planning is the consent authority for SSD.

This report requests the issue of the SEARs for the project under section 78[8A] of the EP&A Act and Clause 3 of Schedule 2 of the EPAR.

The Minister [or the Minister's delegate] is required to take into consideration the matters listed under section 79C of the EP&A Act when determining the development application.

### 4.2 Heritage Act 1977

The *Heritage Act 1977* makes provisions to conserve the State's environmental heritage. It provides for the identification, registration and protection of items of State heritage significance and constitutes the Heritage Council of New South Wales.

The Sydney Opera House is listed on the State Heritage Register.

Notwithstanding that the development comprises SSD, clause 90 of Schedule 6 and Clause 16A of Schedule 6A of the EP&A Act provide that approval under section 57[1] of the Heritage Act is required for development at the Opera House.

An Order under section 57[2] of the Heritage Act provides that a range of works at the Opera House are exempt from the requirement for approval under section 57[1]. The proposed JST Combined Projects subject to this SEARs request are considered to be beyond the scope of these exemptions and will therefore require approval under section 57[1] of the Heritage Act.

### 4.3 Environment Protection and Biodiversity Conservation Act 1999

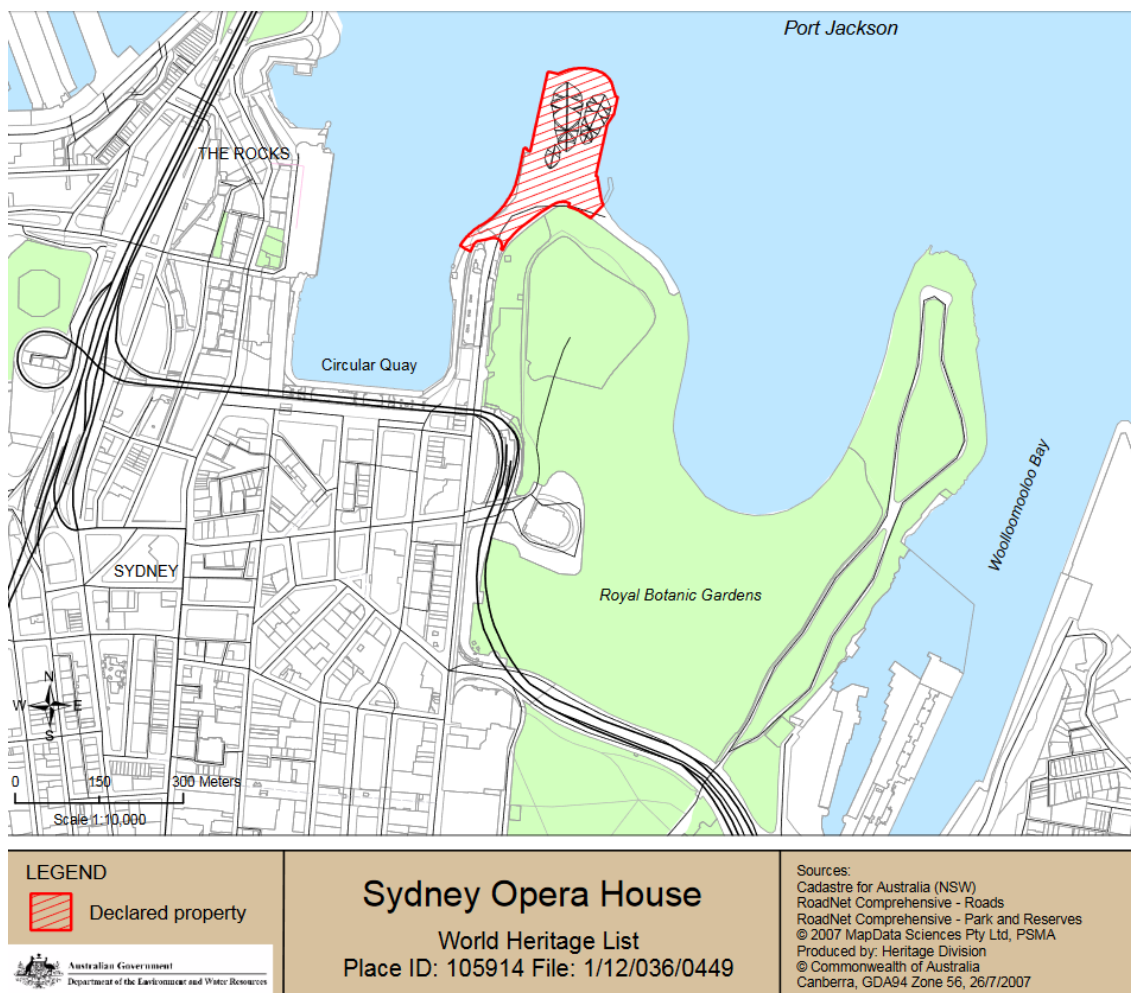
The *Environment Protection and Biodiversity Conservation Act 1999* [EPBC Act] provides for the protection of Matters of National Environmental Significance, including National and World Heritage listed sites.

The Sydney Opera House was inscribed on the National Heritage List in 2005 and the World Heritage List in 2007.

Actions that will or are likely to have a significant impact on matters of environmental significance under the EPBC Act require the approval of the Commonwealth Minister for the Environment. The

proposed JST Combined Projects works will be referred to the Commonwealth Department of the Environment for advice on whether approval under the EPBC Act is required.

The NSW and Commonwealth Governments have entered into a bilateral agreement covering the assessment process, which allows the Commonwealth to rely on specified NSW environmental impact assessment processes in assessing actions under the EPBC Act.



**Figure 6:** Sydney Opera House World Heritage Listing [Source: Commonwealth Department of the Environment]

## 4.4 Environmental Planning Instruments

### 4.4.1 State Environmental Planning Policy [State and Regional Development] 2011

The SRD SEPP declares certain types of development and infrastructure to be of State and regional significance.

Clause 8 of SRD SEPP declares development to be SSD where a development is not permitted without consent and is listed in Schedule 1 or 2 of the SRD SEPP. The proposal is SSD in accordance with Clause 1 of Schedule 2 of the SRD SEPP, which states:

**1 Sydney Opera House**

*All development on land identified as being within the Sydney Opera House Site on the State Significant Development Sites Map*

### 4.4.2 State Environmental Planning Policy [State Significant Precincts] 2005

The *State Environmental Planning Policy [State Significant Precincts] 2005* [SSP SEPP 2005] seeks to broadly facilitate the development, redevelopment and protection of state significant precincts and to ensure the service delivery outcomes for a public purpose. The SSP SEPP identifies a number of State significant precincts and provides planning controls relating to the carrying out of development in these precincts.

The SSP SEPP identifies the SOH as a state significant precinct and provides exempt development provisions for the precinct.

Due to the scope of works and their potential heritage impacts, the proposed Accessibility and Front of House works are not considered to fall within the *exempt development* provisions of the SSP SEPP and therefore require development consent.

### 4.4.3 Sydney Regional Environmental Plan [Sydney Harbour Catchment] 2005

The *Sydney Regional Environmental Plan [Sydney Harbour Catchment] 2005* [Harbour SREP] sets out objectives and planning principles for the Sydney Harbour Catchment.

The Sydney Opera House site is within the Sydney Harbour Catchment Area designated in the SREP. It is within the Foreshores and Waterways Area and City Foreshore Area designated as a Strategic Foreshore Site. It is also identified as a Heritage Item and is in the SREP.

Consequently, the SREP contains a number of provisions relevant to this project and which will be addressed in the EIS, including:

- **Clause 13 – Planning principles for the Sydney Harbour Catchment.** These principles generally relate to the protection of the natural environmental qualities and scenic character of the harbour and its catchment.
- **Clause 14 – Planning principles for the Foreshores and Waterways Area.** These principles generally relate to the protection of the natural environment and scenic character of the harbour and its catchment, the enhancement of public access to and along the foreshore, and opportunities for maritime related uses of the foreshore.

- **Clause 15 – Planning principles for heritage conservation.** These principles relate to the protection of heritage items and places and views associated with heritage items in and around Sydney Harbour.
- **Part 3, Division 2 – Matters for consideration in the Foreshores and Waterways Area.** These are matters to be addressed by consent authorities prior to granting consent. Relevant matters include public access to and use of the foreshores, scenic quality, and protection of views.
- **Part 5 – Heritage provisions.** These provisions relate to the protection of heritage items and include specific provisions [Division 3A] relating to the Opera House. These provisions establish a buffer zone around the Opera House which is based on the views and vistas between the Opera House and other public places around the harbour foreshore. It also includes specific matters relating to the protection of the World Heritage values of the Opera House to be considered in relation to development within the buffer zone.

#### 4.4.4 Sydney Local Environmental Plan 2011

The proposal is located on land zoned B8 Metropolitan Centre under the *Sydney Local Environmental Plan 2012* [SLEP 2012]. The relevant provisions of the B8 zone are detailed below:

##### **Zone B8 Metropolitan Centre**

##### **1 Objectives of zone**

- *To recognise and provide for the pre-eminent role of business, office, retail, entertainment and tourist premises in Australia's participation in the global economy.*
- *To provide opportunities for an intensity of land uses commensurate with Sydney's global status.*
- *To permit a diversity of compatible land uses characteristic of Sydney's global status and that serve the workforce, visitors and wider community.*
- *To encourage the use of alternatives to private motor vehicles, such as public transport, walking or cycling.*
- *To promote uses with active street frontages on main streets and on streets in which buildings are used primarily [at street level] for the purposes of retail premises.*

##### **2 Permitted without consent**

*Nil*

##### **3 Permitted with consent**

*Child care centres; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Information and education facilities; Passenger transport facilities; Recreation facilities [indoor]; Registered clubs; Respite day care centres; Restricted premises; Roads; Tourist and visitor accommodation; Any other development not specified in item 2 or 4*

##### **4 Prohibited**

*Nil*

As the proposed works relate to development for the purposes of an "entertainment facility" they are permissible with consent in the B8 Metropolitan Zone.

In relation to Sydney Development Control Plan [DCP] 2012, which supplements SLEP and provides more detailed guidance, clause 11 of the SRD SEPP states that DCPs do not apply to SSD.



## 5 Key Strategic Plans and Documents

### 5.1 NSW Making it Happen

*NSW Making it Happen* sets out the NSW Premier's priorities to grow the economy, deliver infrastructure, and improve health, education and other services across NSW. It includes the State Priority of Increasing Cultural Participation and the specific target of increasing attendance at cultural venues and events in NSW by 15% in 2019. It notes that increasing attendance at cultural venues will have flow-on benefits for job creation, the visitor economy and education.

The proposed development is consistent with this State Priority as it will contribute to the enhancement and modernisation of facilities, including the provision of contemporary, world class theatres at the Opera House, as well as improved accessibility opportunities.

### 5.2 State Infrastructure Strategy

The *State Infrastructure Strategy* sets out the NSW Government's Rebuilding NSW Plan, which involves the investment of \$20 billion in new infrastructure across the state.

The Strategy states that as part of a new cultural infrastructure plan, the Government will focus future investments on creating an arts precinct in the Sydney CBD. This is aimed at re-affirming Sydney as a major centre for the arts. The Strategy states that priority will be given to investment in the Sydney Opera House, Walsh Bay Arts Precinct, and the Art Gallery of NSW.

The proposed works are consistent with this strategic action of creating an arts precinct in the Sydney CBD.

### 5.3 A Plan for Growing Sydney

*A Plan for Growing Sydney* sets out the NSW Government's vision for Sydney to be "a strong global city, a great place to live" and includes a number of supporting directions and actions. Relevant directions and actions include:

#### **Direction 1.1: Grow a more internationally competitive Sydney CBD**

- *Action 1.1.3: Diversify the CBD by enhancing the cultural ribbon which connects new and revitalised precincts including Barangaroo, Darling Harbour, Walsh Bay and the Bays Precinct.* This action references the creation of an arts precinct in the Sydney CBD and notes that the Opera House forms part of a broader cultural ribbon, which covers a collection of iconic buildings and attractions extending from the Australian Museum in the east, along the inner harbour foreshore, to Darling Harbour in the west.

#### **Direction 3.4: Promote Sydney's heritage, arts and culture**

- *Action 3.4.1 Continue to grow global Sydney's CBD as an international arts and cultural destination.* This action notes that the Government will support Sydney's world-class cultural institutions and venues by developing links between venues, adding vibrancy to arts and cultural life in Sydney's CBD.

## 5.4 Sydney Opera House Plans and Policies

### 5.4.1 Sydney Opera House Management Plan

The *Management Plan for the Sydney Opera House* was prepared in 2005 aims to:

- *protect and conserve the National and World Heritage values of the Sydney Opera House;*
- *minimise duplication in the environmental assessment and approval of actions that may impact on the National and World Heritage values of the Sydney Opera House;*
- *ensure there will be adequate environmental assessment of actions that may impact upon the National and World Heritage values of the Sydney Opera House; and*
- *ensure that actions that will have unacceptable or unsustainable impacts on the National and World Heritage values of the Sydney Opera House will not be approved*

The Management Plan incorporates the *Sydney Opera House Conservation Management Plan*, the *Utzon Design Principles* and the *Statement of National Heritage Values of the Sydney Opera House* [these documents are discussed separately below]. It is given legal effect through clause 288 of the [EPAR], which requires consideration of the management plan in the assessment of any development at the Opera House under section 79C[1] of the EP&A Act, including consideration of the proposal with the objectives of the Management Plan.

### 5.4.2 Sydney Opera House Conservation Management Plan, 2003

This document provides an understanding of the place and its history. It also assesses the significance of the place, and provides conservation policies based on the identified heritage values of the Sydney Opera House. There are a number of conservation policies in the CMP relating to the building's setting and exterior, access issues, internal spaces including the Opera Theatre and foyers, and the removal or alteration of fabric, that will be fully addressed in a Heritage Impact Statement [HIS] that will be prepared in support of the EIS.

### 5.4.3 Utzon Design Principles, 2002

The Utzon Design Principles outline Jørn Utzon's vision for the building and its setting, his comments on the future of the building, and the fundamental principles underlying his designs. It is a permanent reference document for the conservation of the building and its setting and to clarify original design intent, manage proposals for change and influence planning controls for the precinct. These Design Principles will be fully considered in the EIS.

### 5.4.4 Statement of National Heritage Values of the Sydney Opera House

This document describes the heritage significance of the Opera House and details its history. Its focus is construction of the main buildings on the design of Jørn Utzon that took place between 1957 and 1973. The relevant provisions of this document will also be considered in the HIS and EIS.

### 5.4.5 SOH Accessibility Masterplan 2015

The *SOH Accessibility Master Plan* [AMP] outlines accessibility initiatives for the Renewal Program in order to ensure that the SOHT and provides an overall plan for accessibility upgrades that can then be progressively implemented via discrete Renewal Projects. The AMP demonstrates the SOHT's commitment to the implementation of the *NSW Government Disability Policy Framework*, which is underpinned by the *Commonwealth Disability Discrimination Act 1992*, the *NSW Anti-Discrimination Act*

1977, the *NSW Disability Inclusion Act 2014*, *Australian Standard AS 1428 Design for Access and Mobility*, and the *Disability [Access to Premises - Buildings] Standards 2010*. The proposed JST accessibility works are being proposed in accordance with the AMP.

## 6 Potential Environmental Issues

### 6.1 Heritage

The EIS will be supported by a HIS prepared by a qualified heritage consultant and will outline how the proposed works have regard to and will not impact on the site's significant heritage values, including its World Heritage status.

This will include a detailed assessment of each of the key elements of the JST accessibility and additional works and the Front of House works which will demonstrate consistency with relevant documents and provisions including the Management Plan, CMP, Utzon Design Principles and Statement of National Heritage Values.

### 6.2 Built form and visual impact

Proposed external works and resultant built form and visual impact issues include:

- **Removal of the marquee from the northern broadwalk:** this will result in a significantly improved built form outcome through the removal of an intrusive structure from a visually prominent part of the site and improved views and vistas to and from the Opera House.
- **Under the Steps works:** these works will include improvements such as lighting and furniture upgrades, new interpretive elements and signage and the removal of non-essential vehicle movements. These works will result in significant improvements to the amenity of this key space, including an improved visual environment, the removal of clutter and vehicles and the creation of a more inviting and useable space for the public.
- **New slot window along the eastern façade:** the slot window is proposed to provide natural light and amenity to the relocated Theatre and Events offices. It will be a non-obtrusive elements which is consistent with existing openings in the eastern façade, including the slot window above.

The proposed works are considered to result in an overall improvement to the visual character of the Opera House building and to its visual setting. These issues will be assessed in greater detail in the EIS.

### 6.3 Transport, traffic and accessibility

Key traffic and transport issues include construction traffic [see section 6.6 below] and changes to traffic and pedestrian arrangements proposed for the Under the Steps area.

The Under the Steps area [also currently known as the vehicle concourse] will be redefined as a primarily pedestrian space, with a range of associated public domain upgrades as outlined in section 6.2 above. Whilst limited vehicle access to this area will still be available, eg drop off for people with mobility issues, alternative vehicle access arrangements will include the use of the loading dock for service vehicles and drop off at the gate house.

Accessibility arrangements will also be improved through the provision of a new escalator from the ground floor to the entry foyer and further accessibility improvements within the building, as described in Section 3.1.

This will result in less potential for conflict between pedestrians and vehicles along the forecourt and the Under the Steps area, whilst still ensuring adequate accessibility arrangements.

## **6.4 Natural environment**

As much of the proposed works are internal and external elements are minor of a minor nature only, the proposal will have no impacts on the natural environment.

## **6.5 Building Code of Australia**

The EIS will be supported by a report prepared by an appropriately qualified consultant confirming compliance with relevant provisions of the Building Code of Australia.

## **6.6 Construction management**

The proposed construction activity will have a number of potential environmental impacts, including:

- Traffic – truck and other vehicle movements associated with the transportation of workers, machinery and equipment and waste.
- Noise and vibration – noise and vibration associated with the use of machinery and equipment for building works.
- Waste – generation of building material and other waste and the need for appropriate disposal.

The EIS will clearly identify all such potential impacts and relevant mitigation and management measures.

## 7 Conclusion

This request for SEARs describes the proposed JST accessibility and additional works and Front of House works, an overview of relevant legislative requirements and key strategic plans and documents and a preliminary assessment of potential environmental issues.

The proposed works are part of the SOHT's Building Renewal Program, which is aimed at maximising the Opera House's economic and cultural contribution to NSW, improving the operational efficiency of the building and ensuring compliance with modern building, accessibility and WHS requirements.

All potential environmental impacts of the proposal, both at the demolition and operation stage, will be comprehensively addressed in the EIS, in accordance with relevant legislation, guidelines and the SEARs.