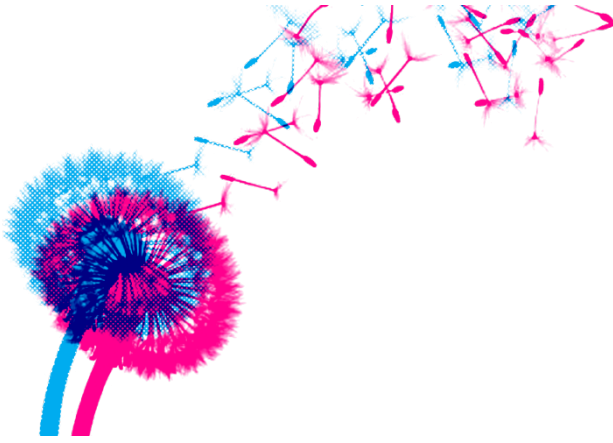
SFS Response to Submissions

(SSD9249)

Attachment 1- Detailed Response to Agency Submissions

September 2018



Attachment 1 – Response to Public Agency Submissions

The following report includes a response to the full text of submissions provided by or on behalf of State and local government agencies. For completeness, the full text of each submission is provided in the left-hand column, accompanied by the proponent's corresponding response in the right-hand column. The proponent's responses have been informed by input by the expert consultant team, and should be read in conjunction with the publicly exhibited Environmental Impact Statement and accompanying technical reports, as well as the Response to Submissions Report to which this document is appended.

1.1 Environment Protection Authority of NSW

No.	Extract	Response
	Environment Protection Authority of NSW	
	Environmental Impact Statement	
EPA1	The EIS (Appendix K *'Noise and Vibration Assessment'*) proposes noise management levels and an alternative measurement system to manage noise emissions from sporting and concert events (i.e. outdoor entertainment activities) at the proposed stadium. However, the EIS does not provide sufficient information for the EPA to properly consider proposed alternatives to those encompassed by the current Notice of Protection.	The noise limits within the current Notice of Prevention are captured in the SCGT Noise Management Plan. A review of these current noise limits, as well as a wider review of noise levels at similar venues across Australia is presented in *5.2.2 Review of noise limits for similar venues* of the Noise and Vibration Impact Assessment provided at **Appendix K** of the publicly exhibited EIS. In addition and expanding on the guidance from the Noise Guideline for Local Governments, the following factors are discussed in Section 5.2 of that report: Time limits / length of events, noise descriptor / measurement time period, assessment method, minimum functional requirements for events, community expectation. The chosen methodology is outlined at Section 5.2.6 and the Applicant considers this a justified and contemporary revision to the noise management levels outlined in the Prevention Notice.
EPA2	The EPA recommends that any approved Concept Plan adopt design parameters that ensure reduced noise impacts from the carrying on of any 'outdoor entertainment activities' at the new stadium (compared to the impacts of similar activities at the existing stadium) through consideration of: • contemporary acoustic design of the stadium to minimise noise emissions during 'outdoor entertainment activities', • restricting vehicular access via 'Paddington Lane' to those times other than the 'night' (i.e. 10.00 pm to 7.00 am Monday to Saturday and 10.00 pm to 8.00 am Sundays and public holidays), • selection, location, installation and operation of noise emitting plant and equipment to minimise noise impacts on surrounding noise sensitive receiver locations, especially residences, and • contemporary noise monitoring/communication technologies to assure real time compliance with noise limits	Consideration of: - contemporary acoustic design - contemporary noise monitoring / communication technologies are discussed in Section 6.3.1.1 and 6.3.1.5 of the Noise and Vibration Impact Assessment provided at **Appendix K** of the publicly exhibited EIS respectively. The Concept Proposal for the redeveloped SFS includes provision of a basement ring road beneath the stadium tiers. All back of house activities including waste rooms, loading docks and bump in and out activities would occur through this ring road. At present the existing SFS does not possess such facilities and all back of house servicing occurs at grade, within external areas around the stadium. Section 4.9 of Appendix J to the exhibited EIS outlines that servicing of the redeveloped SFS would occur via access from Paddington Lane or through Driver Avenue and the existing MP1 car park. Servicing arrangements will be subject to the detailed design and operations plan that will be lodged with the Stage 2 application. Noise and vibration criteria are established for these sources however a detailed assessment of noise and vibration impacts is to be conducted as part of the Stage 2 Environmental Assessment.
EPA3	The EPA has identified a number of areas for which the EIS is considered insufficiently comprehensive and/or detailed to allow the EPA to determine the extent of the impact(s) of the proposal. This includes: (a) potential site contamination; and (b) the impacts, and proposed management of those impacts, of site preparation, demolition, and concrete crushing and loading/stockpiling operations including: noise and vibration impacts on noise sensitive receivers such as UTS Sport Sciences and surrounding residences, child care centres and public recreation areas; impacts on air quality; and impacts on water quality.	The level of contamination assessment is considered sufficient for the Stage 1 Development Application, noting no below ground works are proposed. Appendix S- Phase 1 Contamination Assessment of the exhibited EIS recommends further Phase 2 Detailed Site Investigation be undertaken to accompany the Stage 2 Development Application. A mitigation measure

No.	Extract	Response
		confirming this approach is included at Section 5.0 of the Response to Submissions Report (CP-CG1). Impacts of site preparation and demolition of the stadium and ancillary buildings (including concrete crushing and loading / stockpiling operations) are presented in Table 17 of Appendix K of the publicly exhibited EIS. These results include predicted impacts at UTS Sport Sciences and surrounding residences, child care centres and public recreation areas. Further information regarding the demolition impacts for UTS Sports Sciences is contained within Attachment 6 to this Response to Submissions.
	General	
EPA4	The EPA considers that the project comprises distinct phases of demolition/ construction and operation and has set out its comments on that basis. The EPA considers various environmental issues arising from the Stage 1 assessment process to be inextricably interconnected to environmental issues expected to arise from Stage 2 (construction and operation), albeit that Stage 2 is proposed to be the subject of a separate assessment process. The EPA notes the proximity of surrounding educational establishments, residences and child care centres which may be adversely impacted during site preparation, construction and operation phases of the project.	Noted.
	Demolition/Construction phase	
EPA5	The EPA anticipates that site establishment, site remediation, demolition and demolition-related activities, and concrete crushing and related loading/stockpiling activities, will be undertaken in an environmentally responsible manner with particular emphasis on – • the site contamination and remediation, including any removal and site validation of existing Underground Petroleum Storage Systems, • compliance with recommended standard construction hours, • intra-day respite periods from high noise generating construction activities (including concrete crushing and related loading/stockpiling, jack hammering, rock breaking, pile boring or driving, saw cutting), • feasible and reasonable noise and vibration minimisation and mitigation • effective dust control and management (including effective management of concrete crushing processes, and demolition waste and crushed concrete stockpiles) • erosion and sediment control and water quality management to prevent pollution of local stormwater drainage systems and Kippax Lake by run off from the development site and crushed concrete stockpiles, • demolition and contaminated soil waste handling and management, including on site and waste transport fleet surveillance, and • chemical, fuel and lubricant storage and handling to prevent pollution of surface and underground waters.	The Applicant confirms that the works will be undertaken in accordance with all applicable legislation and in an environmentally responsible manner. Removal of underground petroleum storage tanks does not form part of the Stage 1 Demolition Works, Final mitigation measures for the project addressing these points are contained within Section 5.0 of the Response to Submissions Report (particularly S1-NV1 to NV5, S1-CM1 – S1-CM9, S1-SF1,).
	Hazardous materials (incl. asbestos containing material)	
EPA6	The EPA understands that the Sydney Football Stadium was constructed in 1988 at which time asbestos containing materials are unlikely to have been used in construction. However, the EIS is not supported by a hazardous materials survey and thus it is possible that asbestos containing materials may be present	A Hazardous Materials Survey for the existing stadium and ancillary structures will be prepared prior to the commencement of demolition. This is included in the revised Mitigation Measure S1-CG1 outlined in **Section 5.**0 of the Response to

No.	Extract	Response
	onsite having been used in other structures on the development site, in conjunction with installation of underground utilities (e.g. inspection boxes and conduits), or as a result of previous demolition activities or in fill materials.	Submissions. Note that this application does not involve any ground disturbance, and fill and ground contamination will be addressed as part of the future Stage 2 Development Application.
EPA7	The proponent be required (prior to commencing any work on the development site) to undertake a hazardous materials survey (including asbestos containing materials) of existing structures and fill material on the development site.	See above.
EPA8	The proponent be required (prior to commencing any work on the development site) to prepare and implement a procedure for identifying and dealing with unexpected finds of site contamination (including asbestos containing materials). That procedure should include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved.	An unexpected finds protocol will be included in the detailed Demolition Environmental Management Plan to be prepared prior to the commencement of works. This is included in the revised Mitigation Measure S1-CM1 outlined in **Section 5.0** of the Response to Submissions.
	Site contamination	
EPA9	Demolition of the stadium bowl, the Sheridan and other ancillary buildings along with their associated underground utilities, as well as bitumen and other paved surfaces surrounding the stadium are proposed. The EPA also notes that EIS section 6.17 (1 51 para) indicates the presence of two " ...USTs ... " [i.e. an Underground Petroleum Storage System (UPSS)] located on the eastern side of the development site but does not indicate whether that UPSS is proposed to be removed during Stage 1.	The UPSS are not proposed to be removed as part of the works which are the subject of this application.
EPA10	The EIS includes limited assessment of soil and groundwater contamination: • a 'Preliminary Site Investigation' report (Appendix S) limited to a desktop study and site inspection and a 'Groundwater Assessment' report (Appendix T) which is limited to desktop studies on groundwater. • Appendix T is not a groundwater contamination study consistent with the National Environment Protection (assessment of contamination) Measures 2013 as amended or the EPA's 'Guidelines for Consultants Reporting on Contaminated Sites'. This may be appropriate if, as the EIS indicates (Section 6.3 (and 6.17), the stadium can be demolished without ground disturbance. The EPA is seeking confirmation that Stage 1 site establishment and demolition (including operation of heavy demolition equipment, and demolition of ancillary structures, associated underground utilities and paving) works can be undertaken without disturbance of potentially contaminated soil and potentially contaminated fill material, and disturbance of the existing Underground Petroleum Storage System.	The works do not entail ground disturbance or removal of the UPSS. This will be subject to the future Stage 2 Development Application which will include additional environmental assessment to support this activity.
EPA11	In the case where ground disturbance may occur, the EPA makes the following recommendations: The proponent be required to: • engage a site auditor accredited under the Contaminated Land Management Act 1997 to review the adequacy of the investigations to date, the required unexpected finds protocol, any remedial works or management plan required and/or to confirm the suitability of the proposed land use; • ensure that any contamination identified as meeting the trigger in the EPA 'Guidelines for the Duty to Report Contamination') is notified (or re-notified) in accordance with requirements of section 60 of the Contaminated Land Management Act'; • ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination;	These comments are not applicable to the current application but would be considered as part of the preparation of the Stage 2 Development Application.

No.	Extract	Response
	• follow the processes outlined in State Environmental Planning Policy 55- Remediation of Land (SEPP55), to assess the suitability of the land and any remediation required in relation to the proposed use;	
EPA12	The proponent be required (for future works after the demolition stage) to consider engaging an accredited site auditor to provide a site audit statement (SAS) and accompanying site audit report (SAR) prepared following completion of remediation and validation (if applicable), certifying suitability of the development site for the proposed use prior to undertaking any Stage 2 demolition and construction.	Noted – to be considered as part of future Stage 2 Development Application.
EPA13	The proponent be required to ensure site preparation and demolition activities do not compromise the integrity of the existing UPSS.	Noted. This is included in Mitigation Measure S1-CM1 at Section 5.0 of the Response to Submissions.
EPA14	In the event that the existing UPSS is to be removed during Stage 1, the proponent be required to undertake a detailed site investigation after removal to fully characterise the site and validate removal.	Not applicable.
EPA15	The proponent be required to ensure that following relocation or demolition of any existing structures and in ground utilities further investigation be undertaken of soil contamination within the footprint of those structures and utilities prior to undertaking any construction.	Appendix S- Phase 1 Contamination Assessment of the exhibited EIS recommends further Phase 2 Detailed Site Investigation be undertaken to accompany the Stage 2 Development Application. Mitigation Measure CP-CG2 confirming this approach is included at Section 5.0 of the Response to Submissions Report.
	Water quality	
EPA16	EIS section 6.14.3 indicates the site is subject to regular flooding and "an area of high flood hazard is present to the south of the site". The EPA expects the proponent to adopt all such measures as may be necessary to prevent pollution of waters, especially Kippax Lake and underlying groundwater resources. Unprotected demolition waste and crushed concrete stockpiles have the potential to alter the physical characteristics of stormwater runoff by entrainment of fine particulates and resultant increased turbidity and pH.	An updated Erosion and Sediment Control Plan is provided at **Appendix 10** to the Response to Submissions**.**
EPA17	The proponent be required to ensure that demolition and waste and crushed concrete stockpiles are covered or otherwise protected to prevent fine particulates being entrained in stormwater runoff and from the development site.	Noted, this is addressed in the Construction (Demolition) Management Plan and will be addressed in the detailed Demolition Environmental Management Plan to be prepared prior to the commencement of works. This is addressed in the final Mitigation Measures outlined in Section 5.0 of the Response to Submissions (CP-CM1).
	Noise and vibration	
EPA18	The EPA notes that site establishment (including tree clearing and mulching) and demolition operations may have significant noise and vibration impacts on surrounding educational establishments, residences, child care centres and public recreation areas. In order to fully assess feasible and reasonable (Stage 1) noise mitigation and management measures, clarification is required of the projected duration of proposed – • stadium and related demolition activities the subject of Stage 1, and • concrete crushing and associated loading/stockpiling activities.	Projected durations of early works construction stages are presented in Table 15 of Appendix K of the exhibited EIS. The approximate durations of each construction stage are: - Procurement & site establishment (which includes mulching) – 30 days - Ancillary building demolition (which includes concrete crushing & loading / stockpiling activities) – 190 days - Stadium demolition (which includes concrete crushing & loading / stockpiling activities) – 240 days
EPA19	The EIS (Figure 21 (p.43)) indicates that the 'Stage 1 Demolition Site Compound' is to be located between the NRL and ARDC buildings which adjoin the compound to the south and north respectively. The EPA understands that both the NRL and ARDC buildings would continue to operate throughout Stage 1 demolition works and further that the University of Technology Sydney Sport Sciences faculty occupies part of the ARDC building.	Noise impacts to the NRL and ARDC buildings are included in **Attachment 6** of the Response to Submissions. The teaching spaces within the UTS Sydney Sport Sciences faculty have subsequently been assessed as educational institutions.

No.	Extract	Response
EPA20	The EPA notes that Appendix K: 'Noise and Vibration Assessment' – • does not identify the adjoining ARDC building as an 'educational institution' in Figure 3 (Noise sensitive receiver locations and NCAs), • recommends in section 6.1 .3 that the noisy concrete crusher be located" ... to the south of the site as far from receivers as possible." which would be near the ARDC building, • incorrectly identifies the University of Technology Sydney as a 'Commercial' usage in Table 3 instead of an 'educational institution', • incorrectly assesses impacts against the management level for commercial premises rather than classrooms at an educational institution, and • incorrectly suggests in section 7.1 the possibility that the NRL and ARDC buildings may not" ... remain operational during demolition works.".	The assessment of the Rugby Australia (ARDC) building, with the revised classification as an 'education institution', is presented in Attachment 6 to the Response to Submissions. The referenced statement in Section 7.1 states "*Noise impacts may affect occupants in the University of Technology Sydney Rugby Australia and NRL building, and scheduling of works and consultation is recommended should these buildings remain operational during demolition works*." This statement is considered to be accurate.
EPA21	The EIS does not appear to adequately assess available feasible and reasonable demolition and concrete crushing noise mitigation and management measures. Consideration should be given to: (a) using hydraulic shears instead of rock breakers in the demolition of some concrete structural components of the existing stadium, and (b) locating the concrete crushing and related loading/stockpiling operation and processed material stockpiles inside an acoustic enclosure/shed (with the added benefits of protecting those activities and stockpiles from wind action, rainfall and runoff and thus minimising air and water quality impacts as well as noise impacts).	The use of hydraulic pulverisers (hydraulic shears) has been added as a mitigation measure in Section 5.0 of the Response to Submissions Report (S1-NV2). The use of an acoustic shed around the concrete crushing and stockpiling operations has been considered however has not been pursued for the below reasons. A enclosure will be constructed around the concrete crusher to assist with dust management as its primary purpose and this will assist in some degree with acoustic attenuation. The Applicant notes the following in regards to an acoustic enclosure of stockpiles and the concrete crusher: - Access to stockpiles would be restricted thereby slowing down works and extending duration of noise impacts - Exceedances of NMLs at receiver buildings are no greater than 9dB, with noise levels at residences comparable with traffic levels from Moore Park Road, with no 'highly affected' residences - Although concrete crusher and stockpiling are the loudest activities during demolition works, reducing their noise contribution will not necessarily reduce noise impacts significantly as the demolition of ancillary buildings and the stadium also contribute to noise levels at receivers.. - The likely location of the concrete crusher at the south-western corner of the site compound is approximately 120m from the on-site UTS & ARU receivers, and approx. 140m from the nearest residential receivers. Noise levels from the concrete crusher are predicted to be 70 dBA, comparable to measured road traffic noise levels of 68 dBA at 256 Moore Park Road. The benefit gained from an acoustic enclosure would be limited by ambient traffic noise levels at all except on-site receivers. The necessity for a fully enclosed acoustic enclosure around the concrete crusher is therefore not considered reasonable based on the predictive assessment. An enclosure will be constructed around the concrete crusher, however its primary purpose will be to assist with the management of dust. Refer to section 3 of Attachment 6 to this Response to Submissions, and additional mitigation measure (S1-NV4/5).
EPA22	**Recommendation** The proponent be required to –	

No.	Extract	Response
	(a) identify the adjoining University of Technology Sydney occupancy of the ARDC building as an 'educational institution' as referred to in Table 3 to the Interim Construction Noise Guideline, (b) re-assess the predicted noise impacts of demolition activities and the concurrent concrete crushing and related loading/stockpiling operation against the applicable 'management level' (i.e. internal noise level) for an educational institution, (c) identify when University of Technology Sydney classrooms would be in use, and (d) propose feasible and reasonable noise mitigation measures to ensure the applicable 'management level' (i.e. internal noise level) is not exceeded.	a) Addressed at comment EPA20 b) Addressed at comment EPA20 c) Addressed at comment EPA20 d) This comment does not accurately reflect the requirements of the ICNG, as it is not the requirement of the ICNG to 'ensure the applicable management level is not exceeded'.
EPA23	The proponent be required to assess the feasibility and reasonableness of available noise mitigation and management measures including the deployment of hydraulic shears instead of rock breakers during Stage 1 demolition activities.	Addressed at comment EPA21
EPA24	**General construction hours** The EPA notes that the EIS indicates that stage 1 demolition works are proposed to be undertaken during the recommended standard construction hours. Recommendation The proponent be required to ensure that as far as practicable all demolition, site preparation, bulk earthworks, construction and construction-related activities >5 dB above the rating background level (likely to be audible) at any noise sensitive receivers such as surrounding residences are only undertaken during the standard construction hours, being – (a) 7.00 am to 6.00 pm Monday to Friday, (b) 8.00 am to 1.00 pm Saturday, and (c) no work on Sundays or gazetted public holidays.	The EPA's recommendation is consistent with the ICNG, albeit the criteria is not applicable for non-residential uses. The NVIA nonetheless recommends that work be restricted to standard hours- Section 6.1.4 of Appendix K of the exhibited EIS (S1-NV1).
EPA25	**Intra-day respite periods** The EPA anticipates that those demolition, site preparation, bulk earthworks, construction and construction-related activities generating noise with particularly annoying or intrusive characteristics (such as those identified as particularly annoying in section 4.5 of the Interim Construction Noise Guideline) would be subject to a regime of intra-day respite periods where – (a) they are only undertaken after 8.00 am, (b) they are only undertaken over continuous periods not exceeding 3 hours with at least a 1 hour respite every three hours, and (c) 'continuous' means any period during which there is less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the intrusive and annoying work referred to in Interim Construction Noise Guideline section 4.5 Intra-day respite periods are not proposed to apply to those demolition, site preparation, bulk earthworks, construction and construction-related activities that do not generate noise with particularly annoying or intrusive characteristics. The proponent be required to schedule intra-day 'respite periods' for construction activities identified in section 4.5 of the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents.	The trigger for consideration of intra-day respite periods is not the presence of annoying or intrusive characteristics per Section 4.5 of the Interim Construction Noise Guideline (ICNG). Table 2 of the ICNG outlines that intra-day respite periods would be considered where noise levels are predicted to exceed the 'highly noise affected' management level of LAeq(15minute) 75 dB(A). Nonetheless the recommendation that intra-day respite periods be included during particularly intrusive activities is covered in Section 6.1.4 of Appendix K of the exhibited EIS. This is restated as a mitigation measure at Section 5.0 of the Response to Submissions Report (S1-NV2).
EPA26	**Idling and queuing construction vehicles**	Section 6.13.1 of Appendix J- Transport Impact Assessment of the exhibited EIS includes mitigation measures to restrict the arrival of deliveries and spoil removal to

No.	Extract	Response
	The EPA is aware from previous major infrastructure projects that community concerns are likely to arise from noise impacts associated with the early arrival and idling of construction vehicles (including concrete agitator trucks) at the development site and in the residential precincts surrounding that site. Recommendation The proponent be required to ensure construction vehicles (including tip trucks and concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours.	standard construction hours as well as restricting vehicles from queuing on public roadways (S1-TA2). These mitigation measures have been restated in Section 5.0 of the Response to Submissions Report (S1-TA2).
EPA27	**Reversing and movement alarms** The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. Transport for NSW (nee Transport Construction Authority), Barangaroo Delivery Authority/Lend Lease and Leighton Contractors (M2 Upgrade project) have undertaken safety risk assessments of alternatives to the traditional 'beeper' alarms. Each determined that adoption of 'quacker' type movement reversing alarms instead of traditional beepers on all plant and vehicles would not only maintain a safe workplace but also deliver improved outcomes of reduced noise impacts on surrounding residents. Interim Construction Noise Guideline Appendix C provides additional background material on this issue. **Recommendation** The proponent be required to consider undertaking a safety risk assessment of site establishment, demolition, and concrete crushing and related loading/stockpiling activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety. The Concept Plan design parameters require the proponent to consider undertaking a safety risk assessment of stadium precinct dedicated mobile plant and equipment operations to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.	The use of 'quacker' alarms has been added as mitigation measures at Section 5.0 of the Response to Submissions Report (S1-NV2).
EPA 28	**Dust control and management** The EPA considers dust control and management to be an important air quality issue during site establishment, demolition, and concrete crushing and related loading/stockpiling activities, bulk earthworks and subsequent construction. Recommendation The proponent be required to : (a) minimise dust emissions on the site, and (b) prevent dust emissions from the site. Note: The provides additional comment and recommendations concerning air quality (dust) impacts associated with concrete crushing and related loading/stockpiling operation in section 2.8 to this Attachment.	Refer to Air Quality Assessment provided at **Attachment 11** of the Response to Submissions and Final Mitigation Measures at Section 5.0 of Response to Submissions (S1-CM1, S1-CM8/9).
EPA29	**Sediment and erosion control** The EPA notes that Kippax Lake is in close proximity to the site and the site is underlain by the Botany Sands Aquifer. Managing Urban Stormwater Soils and Construction, 4th Edition published by Landcom (the so-called 'Blue Book') provides guidance material for achieving effective sediment control on construction sites. The	An updated Erosion and Sediment Control Plan is provided at **Appendix 10** of the Response to Submissions, that requires compliance with the Blue Book.

No.	Extract	Response
	proponent should implement all such feasible and reasonable measures as may be necessary to prevent water pollution in the course of developing the site. The EPA emphasises the importance of – (a) not commencing demolition, site preparation, bulk earthworks, construction and construction related activities until appropriate and effective sediment controls are in place, and (b) daily inspection of sediment controls which is fundamental to ensuring timely maintenance and repair of those controls. Note: The provides additional comment and recommendations concerning water quality impacts associated with concrete crushing and related loading/stockpiling operation in section 2.8 to this Attachment	A mitigation measure regarding the implementation of the Erosion and Sediment Control Plan is outlined in Section 5 of the Response to Submissions Report (S1-SF1).
EPA30	**Waste control and management (general)** The EIS indicates that during Stage 1 – (a) an estimated 11 ,050 tonnes of steel, bitumen and glass together with an unknown volume of concrete demolition waste are to be removed for recycling, and (b) despite materials recycling and re-use an estimated 250 tonnes of demolition waste and an unknown volume of potentially contaminated soil would need to be classified and directed for disposal to landfill. The proponent should manage waste in accordance with the waste management hierarchy. The waste hierarchy, established under the Waste Avoidance and Resource Recovery Act 2001, is one that ensures that resource management options are considered against the following priorities: • Avoidance including action to reduce the amount of waste generated by households, industry and all levels of government • Resource recovery including reuse, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources • Disposal including management of all disposal options in the most environmentally responsible manner. The EPA notes the proponent's target of recycling or re-using 90 per cent of Stage 1 demolition waste (see also section 2.8 of this Attachment concerning processing and stockpiling concrete for re-use). The EPA emphasises that all wastes generated during the project must be properly assessed, classified and managed in accordance with the EPA's Guidelines to ensure proper treatment, transport and disposal at a landfill legally able to accept those wastes. The EPA further anticipates that, without proper site controls and management, mud and waste may be tracked off the site during the course of the project. **Recommendation** The proponent be required to ensure that: (1) all waste generated during the project is assessed, classified and managed in accordance with the EPA "Waste Classification Guidelines Part 1: Classifying Waste", November 2014 and the 2016 Addendum thereto; (2) the body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and	Noted. EPA's recommendations are standard requirements and are able to be required as a condition of development consent.

No.	Extract	Response
	(3) mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises.	
EPA31	**Waste streams** Sections 1 0.8.5 and 13 of EIS Appendix E indicate that demolished material will be separated and stockpiled according to their waste streams prior to on site crushing and re-use or off site re-use, recycling or disposal. **Recommendation** The proponent be required to ensure that- (a) materials for re-use or recycling are stockpiled to avoid cross contamination by general and other waste such as hazardous materials and contaminated soil, (b) the location of the development site of stockpiles of waste materials for disposal and of materials for re-use or recycling is planned and mapped, (c) the movement materials from stockpiles of waste materials for disposal and of materials for reuse or recycling is recorded, (d) waste materials stockpiled for disposal and materials stockpiled for re-use or recycling are managed to ensure waste streams reach their intended final destinations, being premises legally able to accept those wastes and materials for re-use or recycling, (e) arrangements for the disposal of waste from the premises is organised with the waste facility legally able to accept that waste rather than through a third party.	Noted, these procedures are included in Section 5 of the Response to Submissions Report and will be required to be included in the final Demolition and Environmental Management Plan produced by the contractor prior to commencement of construction.
EPA32	**Waste generated outside the development site** The EIS does not identify any off site wastes which will be received at the premises for processing, storage, re-use or disposal as part of the Stage 1 early works. The EPA recommends a condition which prohibits the receipt of any wastes generated off site to mitigate any unlawful processing, storage, reuse or disposal of wastes. However, the receipt of any waste compliant with the conditions of a resource recovery order and exemption should be permitted. **Recommendation** The proponent be required to ensure that waste generated outside the development site is not imported to the development site unless the waste material meets all the conditions of an approved resource recovery order and exemption.	Noted, this can be required as a condition of development consent if necessary.
EPA33	**Waste vehicle movements** All waste material leaving the development site for disposal must be disposed at a waste facility legally able to accept that waste. The proponent should be aware that it retains ownership of any waste leaving the development site until it is received at a facility legally able to accept that waste. Given the size and nature of the development site and potentially large quantities of waste material generated during Stages 1 and 2, the EPA considers that it would be prudent for the proponent to take specific measures to track waste from the premises. **Recommendation** The proponent be required to install and operate a video monitoring system with number plate recognition (NPR) capabilities to record all movements onto and off the development site by vehicles involved in transporting waste and recyclable material.	There are multiple exits and entrances to the site (five in total). It is therefore unfeasible to have the Contractor monitor all exits via number plate recognition technology. The works will be undertaken by a Tier 1 Contractor with all sub-contractors to be approved by the Principal. Any EPA identified hazardous waste will be tracked in accordance with the current EPA guidelines.

No.	Extract	Response
	Recommendation The proponent be required to ensure - (a) each vehicle involved in the transport of waste and recyclable material onto or from the development site is fitted with a real time GPS tracking system, and (b) each vehicle involved in the transport of waste and recyclable material from the development site is tracked to ensure those material reach their intended destination.	All waste vehicles accessing and egressing the site to be monitored as follows: • The Contractor will maintain a waste and transport log book which will record the licence plate and waste types of all vehicles accessing and egressing the site. • The Contractor will be required to provide waste disposal receipts matching the time, date, licence plate and the type of waste being disposed. • All waste dockets which confirm the receipt and weight of waste for disposal and/or recycling at a licenced facility must be retained by the Contractor and be provided to the Principal. Waste monitoring • A database inventory would be used to record and report all waste streams, volumes and management measures for all waste streams arising through the demolition works. This database would be used to inform internal and external stakeholders on the type, volume and rate of waste being generated, re-used and recycled. • A licenced waste management contractor would be used to remove waste from the Site for reuse, recycling or disposal. The Contractor will be experienced in removing and transporting waste from the Site and will dispose of the waste at an appropriate licenced facility. These commitments are included as a mitigation measure at Section 5 of the Response to Submissions Report (S1-CM4).
EPA34	**Processing and stockpiling concrete for re-use** Table 2 to EIS Appendix E states – • an estimated 100,000 tonnes of concrete waste would be generated during Stage 1 demolition. • in column 3 "Concrete to be crushed on site and re-used where possible", and • in column 4 "un-used concrete to be transported off-site for sale/recycling by licenced contractor". Table 2 is unclear about what percentage of concrete demolition waste is to be processed for re-use on the development site and what percentage of the processed material is to be transported off site for sale/recycling. The EPA is concerned that the EIS has not adequately addressed the impacts of onsite processing of concrete wastes, including – (a) noise impacts on noise sensitive receiver locations, including UTS and residences, (b) air quality impacts (dust emissions) due to wind action on unprocessed material stockpiles, (c) water quality impacts arising from dust suppression and stormwater runoff from unprocessed material stockpiles, (d) air quality impacts (dust emissions) during transport, loading, processing and stockpiling, (e) air quality impacts (dust emissions) due to wind action on unprocessed material stockpiles, and (f) water quality impacts arising from dust suppression and stormwater runoff from unprocessed material stockpiles.	a. Refer to sections 3 and 6 of Appendix K to the exhibited EIS. Also refer to Attachment 6 to this Response to Submissions. b. Refer to Air Quality Impact Assessment provided at **Attachment 11** of the Response to Submissions. c. Refer to Erosion and Sediment Control Plan provided at **Attachment 10** of the Response to Submissions. d. Refer to Air Quality Impact Assessment provided at **Attachment 11** of the Response to Submissions. e. Refer to Air Quality Impact Assessment provided at **Attachment 11** of the Response to Submissions. f. Refer to Erosion and Sediment Control Plan provided at **Attachment 10** of the Response to Submissions.

No.	Extract	Response
EPA35	Section 6.1.3 to EIS Appendix K recommends that the concrete crusher be located " ... to the south of the site as far from receivers as possible." However, EIS section 6.14.3 indicates the site is subject to regular flooding and "[a]n area of high flood hazard is present to the south of the site. The EPA encourages materials re-use and recycling. However, in order to minimise environmental impacts of concrete crushing, loading and stockpiling on the development site, concrete demolition waste not likely to be re-used on the development should be processed for that re-use at a 'fit for purpose' premises in an industrial setting.	A mitigation measure confirming that only concrete to be reused on site will be crushed is included at Section 5 of the Response to Submissions Report (S1-CM2).
EPA36	**Recommendation** The proponent be required to only crush concrete demolition waste on the development site when a definitive requirement for on-site re-use of the processed concrete material has been clearly identified.	A mitigation measure confirming that only concrete to be reused on site will be crushed is included at Section 5 of the Response to Submissions Report (S1-CM2).
EPA37	The proponent be required to ensure that any demolition material to be re-used on the development site has been properly assessed as suitable for that re-use and that any concrete re-used on the development site does not exceed the chemical and physical contaminant concentrations in Table 1 of the Recovered Aggregate Order 2014.	Noted, this can be required as a condition of development consent if necessary.
EPA38	The proponent be required to implement appropriate controls for concrete crushing and related loading/stockpiling activities and located processed material stockpiles to protect those activities from wind action, rainfall and runoff thus minimising air and water quality impacts and to protect noise sensitive receivers from noise impacts.	This is addressed in the final Mitigation Measures outlined in Section 5.0 of the Response to Submissions (S1-CM2).
	Operational phase	
EPA39	The EPA considers that environmental impacts that arise once the development is operational should be able to be largely averted by responsible environmental management practices, particularly with regard to: (a) feasible and reasonable noise mitigation measures; (b) waste management in accordance with the waste management hierarchy; (c) above ground storage of fuel required to serve any emergency back-up generator; (d) water sensitive urban design; and (e) energy conservation and efficiency.	Noted
EPA40	**Noise and vibration impacts** The EPA notes that that the SEARs only require a qualitative noise assessment in respect of operational noise impacts of the new stadium and the cumulative impact of its operation in conjunction with the Sydney Cricket Ground. As outlined in the cover letter, a Notice of Prevention in respect to noise emissions from 'outdoor entertainment activities' applies to the Sydney Football Stadium and Sydney Cricket Ground. Whilst the Notice of Prevention limits the nature and frequency of various types of outdoor entertainment activities held at the Sydney Cricket Ground, the EPA anticipates that noise impacts from those activities on surrounding residences may – • increase as the existing stadium and associated buildings are progressively demolished (until the new stadium is built), and • change significantly following construction of new stadium on the proposed new footprint.	The NVIA at Appendix K of the exhibited EIS presented a more comprehensive assessment of operational noise emission than required by the SEARs. A quantitative assessment was considered necessary to evaluate the appropriateness of operational noise limits for the new stadium. Increases in SCG event noise levels due to the demolition of Allianz Stadium may be experienced at receivers along Moore Park Road due to the removal of the shielding provided by the stadium. The increase due to removal of shielding is unlikely to generate noticeable impacts during events at the SCG due to the dominance of traffic noise at these receivers, and the low event noise levels from the SCG. It is unclear why the EPA are of the view that noise levels from the Sydney Cricket Ground will change significantly once the SFS is rebuilt. The new SFS is to be constructed in largely the same location and will have a larger envelope with higher facades, thereby providing greater acoustic shielding to

No.	Extract	Response
		Moore Park Road receivers. The results of the assessment are included at Section 5 of Appendix K of the exhibited EIS.
EPA41	**Background noise measurement** The EPA emphasises that properly establishing background noise levels in accordance with guidance material in the Noise Policy for Industry (NPI) is fundamental to a consistent approach to the quantitative assessment of noise impacts of development. The NSW Noise Policy for Industry (NPI) specifies that at least a 'week's worth' of monitoring data is required to establish background noise levels and that noise levels measured during rainfall and wind velocities greater than 5 metres per second (i.e. 18 kilometres per hour) should be excluded when deriving those background levels. However, EIS Appendix K 'Noise and Vibration Assessment' indicates that background noise measurements are affected by meteorological conditions. Thus, the EPA considers that background noise has not been established in accordance with the Noise Policy for Industry, as required by the SEARs. **Recommendation** The proponent be required to undertake additional noise monitoring prior to the Response to Submissions report – (a) to properly establish background noise levels in accordance with the guidance material in the Fact Sheets to the Noise Policy for Industry, and (b) to inform Concept Plan design parameters for assessing operational noise impacts, including the impact of 'outdoor entertainment activities' at the new stadium.	All but one of the six long-term monitoring results used in the impact assessment did include one week of valid measurement results as outlined in section 2.6 of Appendix K of the exhibited EIS. Additional monitoring data for 24 Moore Park Road, which should have been presented in Appendix K, is included in Attachment 6 to this Response to Submissions. No change to the established RBLs or the measured Ambient L_{Aeq} noise levels result from this additional data.
EPA42	**Mechanical plant and equipment** The EIS does not include details of mechanical services, plant and equipment required to serve the new stadium. Recommendation The Concept Plan design parameters require the proponent to: (a) provide a comprehensive quantitative assessment of operational noise impacts on surrounding noise sensitive receivers, especially surrounding residences; and (b) ensure mechanical plant and equipment installed on the development site does not generate – (i) noise that exceeds 5 dBA above the rating background noise level (day, evening and night) measured at the northern boundary of the development site, and (ii) noise that exhibits tonal or other annoying characteristics.	A quantitative operational noise assessment was not required by the SEARs. Details of mechanical plant are not yet available. Noise and vibration criteria are established for these sources and a more detailed assessment is to be conducted as part of the Stage 2 Environmental Assessment. The criteria for mechanical plant and equipment shall be in accordance with the NSW Noise Policy for Industry.
EPA43	**Vehicular access via 'Paddington Lane'** The EPA is aware that 'bump in' and 'bump out' activities and related vehicle movements associated with 'outdoor entertainment activities' typically occur at night. The EPA understands that the proponent prefers that vehicular access to and from the stadium under croft for the purpose of 'bump in' and 'bump out', goods deliveries, maintenance and waste collection services be obtained from Moore Park Road via the existing access known as ''Paddington Lane'. However, the EPA notes that the 'Paddington Lane' access involves a steep ramp up from the stadium precinct level to road level and anticipates significant noise impacts as heavy vehicles negotiate access to Moore Park Road, particularly at night. **Recommendation**	The Concept Proposal for the redeveloped SFS includes provision of a basement ring road beneath the stadium tiers. All back of house activities including waste rooms, loading docks and bump in and out activities would occur through this ring road. At present the existing SFS does not possess such facilities and all back of house servicing occurs at grade, within external areas around the stadium. Section 4.9 of Appendix J to the exhibited EIS outlines that servicing of the redeveloped SFS would occur via access from Paddington Lane or through Driver Avenue and the existing MP1 car park. Servicing arrangements will be subject to the detailed design and operations plan that will be lodged with the Stage 2 application.

No.	Extract	Response
	The Concept Plan design parameters consider alternatives to the 'Paddington Lane' access to Moore Park Road for waste collection vehicles, goods delivery vehicles and other heavy vehicles outside the hours of 7.00 am and 10.00 pm.	
EPA44	**Delivery of and goods and waste collection services** The EPA notes numerous reports of community concern arising from loading dock activities and waste collection services, especially when undertaken during evening and night times. **Recommendation** The proponent be required ensure waste collection services are not undertaken outside the hours of – (a) 7.00 am to 6.00 pm Monday to Saturday, and (b) 8.00 am to 6.00 pm on Sundays and public holidays. **Recommendation** The Concept Plan design parameters require the location of loading docks and waste storage and collection areas as far as possible from residences and preferably under or behind structures that would provide effective acoustic shielding of residences and the UTS Sport Sciences faculty from noise emissions from loading dock and waste collection activities.	The Applicant and the Sydney Cricket Ground Trust is not aware of any community concern or complaints that have been made in relation to existing loading dock and waste collection service activities. As detailed in Appendix J of the exhibited EIS at section 4.9, the redeveloped SFS will include a basement ring road from which all servicing of the new stadium will be undertaken. This will include collection of waste. Furthermore, a new service access point is proposed from Driver Avenue through the MP1 car park for service vehicles. The stage 2 SSDA will detail operational arrangements for waste collection services including parameters for access. It is considered unnecessary for restriction on waste collection hours to be placed on the development, owing to the main impact (noise) being attenuated through the loading of waste vehicles within the building.
EPA45	**Grounds maintenance using powered equipment** The EPA notes numerous reports of community concern arising from grounds maintenance involving the use of powered equipment (example: leaf blowers, lawn mowers, brush cutters) during early morning and evening periods as well as on weekends and public holidays. **Recommendation** The proponent be required ensure grounds maintenance involving the use of powered equipment in the stadium precinct is not undertaken outside the hours of 7.00 am to 6.00 pm Monday to Friday.	The Applicant and the Sydney Cricket Ground Trust is not aware of any community concern or complaints that have been made in relation to existing grounds maintenance activities. The Stage 2 SSDA will detail the operational parameters and assess the servicing impacts of the new stadium. This will include noise emissions from grounds maintenance equipment. It is considered unnecessary for a restriction of hours to be placed on grounds maintenance equipment.
EPA46	**Emergency back-up generator and UPSS** The EPA anticipates that the new stadium would be served by an emergency back-up generator. The EPA having regard to the presence of extensive groundwater resources under the development site, would not favour installation of a UPSS to serve any back-up generator. **Recommendation** The proponent be required to ensure that fuel for any back-up emergency generator is stored above ground and that all associated pipes, fittings and equipment are located above ground.	Noted. This recommendation will be considered as part of the Stage 2 Development Application.
EPA47	**Waste management** The proponent should manage waste in accordance with the waste management hierarchy. **Recommendation** The proponent be required to identify and implement feasible and reasonable opportunities for the reuse and recycling of waste, including food waste.	Noted. This recommendation will be considered as part of the Stage 2 Development Application.
EPA 48	**Water sensitive urban design and energy conservation and efficiency** The EPA acknowledges that EIS section 6.14.1 indicates an existing stormwater detention capacity on Trust lands and that" ... final size and location of ... " additional detention capacity would be determined as part of Stage 2.	Noted. Appendix N of the exhibited EIS outlines the proposed sustainability pathway and commitments for the proposal that will be further developed in the Stage 2 Development Application.

No.	Extract	Response
	The EPA further acknowledges EIS Appendix N provides commitments to Environmentally Sustainable Development practices which should be embodied in any Concept Plan development consent that may be forthcoming. **Recommendation** The proponent be required to implement water sensitive urban design and energy conservation and efficiency measures, including: (a) rainwater harvesting and re-use; (b) water efficient fixtures; (c) installation of rooftop solar photovoltaic arrays for on site electricity generation; (d) storage of surplus energy generated by rooftop solar photovoltaic arrays; (e) (where practicable) use of electric vehicles for dedicated on site transport tasks; and (f) energy efficient electrical equipment, fittings and fixtures.	

1.2 Centennial Parklands and Moore Park Trust (CPMPT)

No.	Extract	Response
	2. Centennial Parklands and Moore Park Trust	
	Security and Hostile Vehicles	
CP1	The mitigation against hostile vehicle attack and creation of stand-off distances to keep potential threats away from buildings and people is raised in the Guidelines. This must be a precinct-based approach incorporating all of Driver Avenue and not deal with the SFS as a single, isolated venue. Given Moore Park is a major event destination with a number of co-located venues, a precinct-based response will ensure similar issues currently faced at the Sydney Cricket Ground (SCG), Royal Hall of Industries (RHI) and the Hordern Pavilion (HP) are addressed at the same time to avoid potentially intrusive measures being replicated around each venue. The approach to entertainment venues typically adopts two lines of defence - an inner and outer cordon. More work is needed from specialist, but the western side of Driver Avenue appears to be a logical place for the outer cordon in event mode, thus protecting pedestrians using the road space in event mode.	The Urban Design Guidelines should be read in conjunction with other appendix reports submitted with the EIS. This includes Appendix R- Security Principles Report of the exhibited EIS, which outlines the principles by which the detailed design of security will be undertaken and submitted with the Stage 2 SSDA. Whilst it is recognised that the redeveloped SFS will exist within a precinct of entertainment and sporting venues, the security arrangements at these venues will need to be planned and implemented by the respective building owners and operators. Nevertheless, the Applicant commits to working with Centennial Park and Moore Park Trust (CPMPT) to develop a security solution for the redeveloped SFS that may be utilised as a template design for other venues within the precinct. The Applicant notes that a working group has been established with CPMPT to develop these designs amongst other commitments. Further liaison with other agencies including Transport for NSW and NSW Police and Counter Terrorism will also be undertaken and a final design of security measures will be included in the Stage 2 Development Application. Mitigation Measure CP-SEC3 confirming this approach is contained in Section 5 of the Response to Submissions Report.
CP2	The key attributes of the Centennial Park and Moore Park Trust's 'hostile vehicle business case' should be included within the project.	See response to comment CP1.
CP3	The Urban Design Guidelines should take into account two recent security documents, one jointly published by the Australian and New Zealand Governments, and the second published by NSW Police. These documents should be referenced in the Guidelines - and the inner and outer cordons should be specifically diagrammed on a plan on page 117. The current draft guideline for Safety and Security requires further enhancement in this regard. The extent of this drawing should capture Driver Avenue, the SFS, SCG, HP and RHI.	The Urban Design Guidelines present the parameters for the end-design of all elements of the stadium, including security measures. They are not intended to be an exhaustive brief for the development of the design of the project. During the preliminary design phase NSW Police Counter Terrorism were consulted and briefed. As part of their feedback they provided relevant current national guidance on protecting crowded places from terrorism. The Applicant undertakes to ensure that the security detailed design for the Venue will reference all the relevant guidelines.
	Future links to Fox Studios and Entertainment Quarter	
CP4	The Guidelines make several mentions of the opportunity for the redevelopment of the SFS to establish important connections, or at least to safeguard the opportunity to create such connections in the future. Moore Park 2040 raises the potential for a north-south link from Paddington Lane, alongside the SFS, through the concourse of the SCG (when the Messenger Stand is redeveloped), to the Victor Trumper Stand public concourse, and then via a bridge across Fox Studios' access driveway, and into the Entertainment Quarter. This link is partly indicated in the Guidelines - in the immediate vicinity of the SFS - but should be described more explicitly and consistently at pages 33, 54, 76, 86 and 104 and in the corresponding diagrams.	An additional page (5) describing future links has been added to the Final Urban Design Guidelines provided at **Attachment 4** of the Response to Submissions. This more clearly reflects the Centennial Parklands aspirations for these links as outlined in Moore Park Masterplan 2040.

No.	Extract	Response
CP5	Moore Park 2040 also raises the opportunity for a second, east-west link, which would run between the SCG and SFS, and - at a suitable point in the future - connect directly into the heart of the Fox Studios precinct, on the alignment of Chips Rafferty Avenue. The potential for this future link should be described more explicitly on pages 33, 54, 76, 86 and 104 and in the corresponding diagrams.	See response to comment CP4.
CP6	In describing these potential linkages, the Guidelines should also elaborate on appropriate levels and tie-in points (referencing existing concourse levels, the Bradman Terrace level, Paddington Lane levels and so on) so the future detailed design can deliver a clear, legible and accessible network of linkages.	See response to comment CP4.
	Pedestrian linkages and lighting in Moore Park	
CP7	The Guidelines highlight the need to link the SFS redevelopment to recent and current projects in Moore Park - specifically the Tibby Cotter Bridge and the new CBD and Southeast Light Rail stop in Moore Park south. However, the Guidelines appear to stop short of making any specific commitment to design or delivery of these links. This may be partly due to the desire to not be seen to be 'taking over' control of CPMPT land beyond the SFS site. The stadium project cannot be developed successfully without this connecting infrastructure being delivered concurrently with the SFS redevelopment. The Light Rail project also has commitments to design and deliver its connecting infrastructure, yet no detail of the final proposed design is reflected in the Guidelines.	The Applicant will establish a working group with CPMPT to advance the design of: • connections to the light rail • connections to Tibby Cotter Bridge • security infrastructure for Driver Avenue • public realm treatment of the northern portion of Driver Avenue adjacent to the redeveloped SFS entry • cycle infrastructure within the precinct This has been included as Mitigation Measures CP-TA2 and CPTA6 at Section 5 of the Response to Submissions Report.
CP8	The Trust invites close consultation and a joint design workshop forum between INSW, CPMPT and other stakeholders in the precinct to resolve the form and detail of these critical links. In this way the applicant is not seen to be speculating on proposals beyond the subject site, but can make a commitment to their design and implementation. Such a recommendation would sit comfortably in the Guidelines at pages 32, 33 (where the pedestrian link indicated across Kippax Lake should also be amended), 42, 43, 44 (particularly in the final paragraph), 63 (as part of peripheral works), 85, 102 and 103.	See response to comment CP7.
CP9	Pedestrian flows and lighting across Moore Park to the Moore Park Light Rail stop need to be carefully considered in both shorter and longer term scenarios. The current design diagrams indicate a primary stadium entry and concourse addressing Driver Avenue at the northern end of Kippax Lake. This means many patrons will need clear decision points when arriving or leaving the precinct. Existing footpaths are inadequate and do not anticipate the Moore Park Light Rail stop, and also do not yet adequately connect to the Tibby Cotter Bridge.	See response to comment CP7.
	Waste management in Moore Park	
CP10	Waste management during event mode is a significant environmental issue for the precinct and needs to be addressed in more detail in the Guidelines. Patrons exiting the stadiums should pass well-designed, well-sited waste disposal opportunities, which should be resolved on a precinct-wide basis during preliminary design.	Noted. This recommendation will be considered as part of the Stage 2 Development Application.
	Cycle facilities in Moore Park	
CP11	The Guidelines make provision for the design and siting of bike racks. Again, a more strategic precinct-wide approach is required to ensure that unnecessary duplication of bicycle facilities is not promoted at each individual venue along Driver Avenue, potentially contributing to unnecessary clutter in the public realm. A	See response to comment CP7.

No.	Extract	Response
	strategic approach would potentially allocate a smaller component of cycling facilities at each venue with the balance strategically located across Moore Park east to serve all venues in the vicinity. In line with recommendation 3b) above, the Trust invites a joint design workshop forum to resolve the optimal solution for precinct-wide cycle facilities.	
	SFS project exclusions	
CP12	On page 31 of the Guidelines, there are two design elements specifically excluded from the proposed scope of work. These exclusions were emphasised by INSW at a presentation to the Trust on 8 May 2018. However, the Trust would expect the redevelopment of the SFS will contribute to the design and delivery of an integrated public realm within Moore Park east. The stated project exclusions are: a) The pedestrianisation of Driver Avenue b) Removing "on-grade" event parking from grassed areas	See response to comment CP7. In respect of the pedestrianisation of Driver Avenue it is understood that the Moore Park master plan envisages the creation of a more pedestrian friendly environment along the roadway. This outcome is supported by the Urban Design Guidelines contained in Appendix C to the exhibited EIS. The removal of at-grade parking from Moore Park is a matter for CPMPT. Appendix J-Transport Impact Assessment of the exhibited EIS at section 4.7.1 acknowledges the intent of the Moore Park Masterplan 2040 to remove of parking on Moore Park.
CP13	The Moore Park Master Plan 2040 calls for the management of Driver Avenue during event days as a pedestrian space - but specifically does not anticipate the permanent pedestrianisation of the full length of Driver Avenue. To this extent, the Trust does expect the redevelopment of the SFS will contribute to the anticipated outcome.	See response to comment CP12.
CP14	Further, on page 26, 'Outcomes from Consultation with Centennial Parklands and Moore Park Trust' the Guidelines state 'Close Driver Avenue…as a shared vision between CPMPT and SCG'. This statement needs to be modified to acknowledge the ambition for the flexible use of Driver Avenue. It then follows that the Trust and INSW should work cooperatively to resolve, design and deliver the public realm treatment for at least a northern portion of Driver Avenue as part of the SFS redevelopment. To ensure the proposed public realm design treatment for Driver Avenue is consistent for its full length, any design solution for the northern portion should be able to be implemented in the future along the remainder of Driver Avenue.	The Concept Proposal relates only to land controlled by the Sydney Cricket and Sports Ground Trust. The Applicant remains committed to an integrated public realm between SFS and Moore Park East, including Driver Avenue, as outlined in Appendix C-Urban Design Guidelines of the exhibited EIS. See response to comment CP7.
CP15	Similarly, the Moore Park Master Plan 2040 forecasts the progressive reduction in event day "on grade" car parking at Moore Park east, and the return of this area to green open space. The redevelopment of the SFS should therefore contribute to the progressive, staged reduction in event day parking on grass. Given the SFS redevelopment will contribute to improved pedestrian links across Moore Park - to connect to Tibby Cotter Bridge and the new Moore Park Light Rail stop - it seems logical for these works to also contribute to a measured reduction in "on-grade" event day parking.	See response to comment CP12.
CP16	The proposed redevelopment of the SFS also involves the reconfiguration of MP1 and the introduction of the basement parking. As a result, it should further contribute to a net reduction in the extent of parking in the precinct, particularly given the favourable timing associated with the introduction of the CBD and Southeast Light Rail.	The final car park configuration for MP1 will be the subject of the Stage 2 Development Application, however, the project will not result in any increase in the parking numbers within the site boundary.
	Categorisation of Driver Avenue	
CP17	At page 52, in the section dealing with lighting and safety, the Guidelines state: *'Driver Avenue itself is a significant hazard. Not classed as a road under the NSW Roads Act 1993, the road material is inconsistent and features no formal pedestrian crossings. Moore Park Road also features no pedestrian crossing points especially in between Anzac Parade and Oatley Road. On event days, patrons can be seen running across the road due to the lack of formal crossing point.'*	The page references does not form part of the Final Urban Design Guidelines provided at Attachment 4 of the Response to Submissions. The Applicant will explore opportunities for improvements to pedestrian integration as part of the Moore Park Working Group.

No.	Extract	Response
	This section of the Guidelines appears to conflate issues faced at Moore Park Road with those at Driver Avenue. This is confusing and should be amended generally in line with the comments above.	
	Understanding place	
CP18	Pages 17 and 18 within the Guidelines describe Driver Avenue and Entertainment Quarter as 'lacking character'. This statement could be misinterpreted. A more accurate statement would be to say these places often 'lack activation' outside of event mode.	The page references does not form part of the Final Urban Design Guidelines provided at Attachment 4 of the Response to Submissions. It is agreed that the statement that the areas lack 'activation' is a more accurate assessment.
	Extent of construction works	
CP19	The site boundary adopted throughout the EIS documentation shows the general extent of proposed construction work, but the Trust seeks to clarify if this includes or excludes the eastern footpath along Driver Avenue. This footpath is under the care, control and management of the CPMPT, however the drawings seem to indicate the footpath will be incorporated as part of the construction works zone.	The site boundary excludes the eastern footpath along Driver Avenue. Refer to site plans contained within the Appendix of the Final Urban Design Guidelines contained in Attachment 4 of the Response to Submissions.
	Ongoing events at Moore Park	
CP20	The Trust is of the firm view there must be no impact on the operation of Mardi Gras, the Sydney Running Festival or any other event in this area as a consequence of proposed construction. Similarly, some members of the SCG may expect access to car parking during events at the SCG. It is not clear how this will this be addressed during the demolition and construction phase.	A Demolition Environmental Management Plan will be prepared by the Contractor and detail measures to ensure that the proposed works do not adversely impact on other events occurring within the Moore Park precinct. Mitigation Measure S1-CM1 regarding the interaction with these events is included at Section 5 of the Response to Submissions Report. Alternative parking options for members of the SCSGT during SCG events will be communicated prior to the commencement of works. This will include use of existing event parking areas.
	Construction vehicle management	
CP21	To maintain ongoing operational capacity in Moore Park, the Trust expects Driver Avenue will not be used for staging vehicles waiting to access the construction site. All construction vehicles should be accommodated within the construction works zone and not overflow into Driver Avenue or surrounding streets and roads.	Noted. As outlined at section 6.13.1 of Appendix J- Transport Impact Assessment of the exhibited EIS, Driver Avenue will not be used as a staging area for construction vehicles. All trucks are to be held within the construction site for the demolition works, with no queueing on public roads to occur. This is reaffirmed in Mitigation Measure S1-TA2 contained at Section 5 of the Response to Submissions Report.
	Ground water impacts	
CP22	The Construction (Demolition) Management Plan identifies that 'no piling or excavation works will be undertaken as part of the (Stage 1) works'. In any case, future Stage 2 works will likely involve excavation and piling, and the Trust will be concerned for any potential impact to ground water given this ground water forms part of the urban catchment that sustains the Lachlan Swamps, important to the ecological health of nearby Centennial Park. Additionally, the Trust currently depends on ground water bores in Moore Park for irrigation. Consequently, the Trust raises the forthcoming need for an appropriate ground water assessment conducted in terms of water table levels and considering any potential impacts of construction.	Noted. This matter will be considered as part of the Stage 2 Development Application.
	Legislative requirements	
CP23	The Plan lists a number of applicable acts and regulations, but this list will need to also specifically include the *Centennial Park and Moore Park Trust Act 1983* (CPMPT Act) and *CPMPT Regulations* as construction traffic will most likely be entering the proposed construction zone along Trust roads (Driver Avenue is not a gazetted road). This will apply to any works in both stages of the project.	This comment relates to the list of legislation to be addressed by the Proponent contained in the SEARs prepared by the NSW Department of Planning and Environment. The use of Driver Avenue for access is consistent with the requirements of the CPMPT Act. Management of construction works and liaison with surrounding stakeholders will be detailed in the Demolition Environmental

No.	Extract	Response
		Management Plan to be prepared by the Contractor. Refer to Section 5 of the Response to Submissions Report regarding Mitigation Measure S1-CM1.
	Erosion and sediment control	
CP24	The Plan states that during proposed construction works, existing stormwater infrastructure will be utilised during excavation and clearing works, with the addition of an on-site detention tank that will have a pump connection to the existing stormwater infrastructure. Based on the stormwater report, this will connect to existing lines, some of which feed a number of the ponds in Centennial Park. Incoming water quality in Centennial Park is critical to the ecological health of the ponds, and further assessment of any impacts and their mitigation is necessary.	During construction, temporary sedimentation basins will be used to control runoff through the site. These basins structures will be located around the construction activities and runoff will be directed to the receiving downstream stormwater system via temporary channels as illustrated in the sediment and erosion control plan contained at Attachment 10 of this Response to Submissions. The basins and all temporary drainage will be designed using to industry guidelines, namely Landcom's Managing Urban Stormwater (otherwise known as the Blue Book). Sizes, locations and basins will be designed once the construction sequencing and staging has been developed by the contractor. Water collected in the basins will be pumped into the existing stormwater network. The contractor can control when this occurs and pump water only when sufficient sedimentation has occurred to maintain the existing water quality. These measures are temporary and will only be in effect during construction. Separately, the on-site detention (OSD) tanks are permanent stormwater infrastructure which are designed to capture and control the release of stormwater into the receiving network to mitigate the impacts of increased peak surface run off. The tanks are not designed specifically to manage erosion or improve water quality during site works. We note that following demolition of the existing stadium to slab level the behaviour of surface water runoff will be equivalent to existing, with no net change to sediment loads.
	Dilapidation due to construction vehicle access	
CP25	Driver Avenue is nominated as the favoured route into the construction works zone. While the document suggests there is to be no staging, marshalling or queueing along Driver Avenue, a total of approximately 9,000 heavy vehicle movements are estimated to take place during the proposed demolition works. The Trust requests a full dilapidation report for Driver Avenue and the immediate surrounds, including footpaths, between Moore Park Road and the turnaround circle adjacent to Fox Studios entrance.	All vehicle staging and queuing will occur within the site boundaries, as detailed in section 6.13.1 of Appendix J- Transport Impact Assessment of the exhibited EIS. This is further detailed in Mitigation Measure S1-CM1 and S1-TA2 at **Section 5.0 of the Response to Submissions**. It is expected that the requirement to prepare Dilapidation Reports for Driver Avenue would be required as a condition of development consent.
	Potable water	
CP26	The Trust notes the identification of an existing 200mm water main along Driver Avenue. The Trust also anticipates this to be a Sydney Water asset and is unlikely to impact upon Moore Park. If however, detailed Stage 2 design indicates there are issues associated with the proposal for the main supply to be drawn off Moore Park Road, then alternatives may require trenching and associated works in the Driver Avenue corridor. The Trust expects this issue will require clarification and approval.	Noted. This matter will be considered as part of the Stage 2 Development Application.
	Bore water	

No.	Extract	Response
CP27	The Strategy identifies the possible use of bore water. Moore Park depends heavily on bore water for irrigation, and notes that any additional bores proposed to support the construction or operation of the redeveloped SFS may impact on water availability (depth of water table). Any proposal for bores to be sunk in the SFS site area - either temporarily or for permanent use - must be assessed against the total number of operational bores in the area, and demonstrate no adverse impact on the CPMPT operations. This issue also applies to points raised in the stormwater report (see below).	The SCSGT currently relies on an existing bore license for field irrigation at the SCG and existing SFS, and it is proposed that this would continue for the new SFS. No new bores are proposed.
	Fire services	
CP28	The Trust anticipates no specific impacts on Moore Park operations as result of the proposed installation of fire mains. However, the earlier points raised under potable water remain relevant. The final location of any necessary pumps and boosters identified in the detailed design of Stage 2 will require NSW Fire Brigade endorsement and approval. This extends to include possible emergency vehicle access (which may conflict with hostile vehicle mitigation measures), and in some scenarios, may potentially impact upon Driver Avenue, requiring close consultation with the Trust.	Noted. This matter will be considered as part of the Stage 2 Development Application.
	Stormwater and flooding	
CP29	It is important to understand how the flood study and predicted overland flow from the redeveloped SFS may impact Trust land and Driver Avenue. No mention is made in the report of the cumulative impacts created by the light rail construction along Anzac Parade. The Trust notes that Transport for NSW conducted its own flood study at Moore Park as part of its design and construction approvals.	The flood study included as Appendix P of the exhibited EIS demonstrates that there is no worsening downstream from the Moore Park site. The Light rail construction activities are downstream in the stormwater network and thus there is no cumulative impact.
CP30	Additionally, as noted earlier, any bores proposed within the SFS site - either temporary or permanent - must be assessed against the total number of bores in the area to mitigate against any impact on Trust land. This point is also discussed in response to the Construction (Demolition) Management Plan.	No new bores are proposed.
	Waste water and sewer	
CP31	The Strategy identifies the main sewer line for the existing stadium (and for the SCG) runs along Driver Avenue and will require augmentation. This will require significant works and provision for make good, including trenching and road closures or restriction, depending on where the unground services run, and may also impact Moore Park south depending on the extent of works necessary to augment the sewer service. This issue will require clarification and discussion with the Trust.	Noted. This matter will be considered as part of the Stage 2 Development Application.
	Gas	
CP32	There are existing connections to the gas supply along Driver Avenue, but it appears that the new stadium will connect to lines along Moore Park Road. Final design in Stage 2 may require works in Driver Avenue – outside the identified construction zone. This issue will require clarification and consultation with the Trust at the appropriate time.	Noted. This matter will be considered as part of the Stage 2 Development Application.
	Telecommunications	
CP33	While no adverse impacts have been identified, the main telecommunications services run along Driver Avenue. There may be a need to undertake pit and pipe trenching work in Driver Avenue if required with the roll-out of the NBN. Consequently, an application may need to be made to the NBN for site connectivity for those tenants not currently supported by the SCG network. This issue will require clarification and consultation with the Trust at the appropriate time.	Noted. This matter will be considered as part of the Stage 2 Development Application.
	Noise and vibration impact	
CP34	Noise and vibration will be of concern to affected tenants of the Trust in the immediate vicinity - particularly at the Hordern Pavilion, Royal Hall of Industries, Entertainment Quarter and Fox Studios.	This matter is addressed in the Noise and Vibration Assessment prepared by Arup and included at Appendix K to the exhibited EIS. Final mitigation measures for noise from

No.	Extract	Response
	Mitigation strategies to minimise the commercial impact and disruption to these tenants across the precinct need to be carefully assessed.	demolition activities are contained in Section 5 of the Response to Submissions Report.
	Design Excellence Strategy	
CP35	CPMPT is keen to ensure that the proposed Design Excellence Strategy realises the level of design quality expected of a development of this proposed scale and significance. The Strategy describes a competitive design alternatives process, similar to that typically undertaken in the context of the City of Sydney. However, there are a number of competition parameters identified within the Strategy that could be improved in order to achieve design excellence. The specific competition parameters which could be improved include: a) The process should consider more than three competing design teams, preferably five; b) The competition timeframe could run for longer than the proposed 28 days, preferably 60 days; c) The competition design brief could include more of the site elements than simply stadium facade and roof elements; and d) The jury should include an odd number of jury members, preferably five, to assist in decision making.	The Design Excellence Strategy Appendix D of the exhibited EIS has been endorsed by GANSW. The Strategy recognises that the competition is one element that will assist in achieving design excellence for the project. The Design Integrity process outlined at section 3.2 of Appendix D will further assist in the achievement of design excellence for the project, ensuring an ongoing iterative process creates the best outcome for the site.
	Statutory and strategic context	
CP36	The following environmental planning instruments should be added under Item 1 - Statutory and Strategic Context (pages 1 and 2): a) State Environmental Planning Policy 47 - Moore Park Showground b) The approved Development Concept Plan for Entertainment Quarter	The Applicant notes that this comment is in relation to the SEARs issued for the project. Neither of these instruments apply to the site of the proposed development, but rather relate to nearby land.
	Policies	
CP37	The following policies should be added under Item 2 - Policies (page 2): a) Moore Park Showground Conservation Strategy 1995 b) The Centennial Parklands Conservation Management Plan (both 2003 and 2010 versions)	The Applicant notes that this comment is in relation to the SEARs issued for the project. Neither of these documents apply to the site of the proposed development, but rather relate to nearby land.
	Transport and accessibility	
	a) Reference to new transport infrastructure in the precinct, specifically the Tibby Cotter Bridge and the City of Sydney's Moore Park Road cycleway. These projects should be considered in assessing existing facilities and future transport demand b) Way-finding strategies should reference work undertaken by TfNSW with the CBD Way-finding Coordination Group, and the Moore Park Transport Plan c) The assessment of any proposed roads and driveways should extend to include pedestrian access, and should specifically reference the proposed northern pedestrian entry between Moore Park Road and the Entertainment Quarter, which would likely be integrated with the stadium redevelopment. Something weird happened to formatting so I can't number the column to the right of this row	The Applicant notes that this comment is in relation to the SEARs issued for the project. a) The Tibby Cotter Bridge and the City of Sydney's Moore Park Road cycleway have been included in the assessment, notably in Appendix C- Urban Design Guidelines and Appendix J- Transport Impact Assessment to the exhibited EIS. b) Appendix C- Urban Design Guidelines of the exhibited EIS outlines the wayfinding and signage strategy that will be detailed in the Stage 2 Development Application. *c)* Appendix C- Urban Design Guidelines of the exhibited EIS propose the retention of an existing vehicular entry down Paddington Lane with grade separation and landscape barriers between to segregate vehicles and pedestrians and creates a

No.	Extract	Response
		more generous space for a potential future north/south connection between Paddington and the Entertainment Quarter.
	Consultation	
CP38	The following agencies and authorities should be included under Consultation (page 11): a) Centennial Park and Moore Park Trust b) Heritage Division of OEH and the Heritage Council of NSW	The Applicant has received feedback from these agencies.

1.3 Roads and Maritime Services

No.	Extract	Response
	Roads and Maritime Services	
	During demolition and construction phase	
RMS1	Roads and Maritime notes that a more detailed Construction Pedestrian and Traffic Management Plan (CPTMP) will be prepared upon the appointment of a contractor and requests that, in addition to the items listed in part 6.14 of the Transport and Accessibility Strategy, the CPTMP includes: 1. An assessment of the cumulative impact on traffic and road safety of this and other developments on the surrounding area.	Noted, the CPTMP will form part of the detailed Demolition Environmental Management Plan as outlined in the Mitigation Measure S1-CM1 and S1-TA1 in **Section 5.0** of the EIS.
	Upon completion of the stadium	
RMS2	1. The proposal should not affect the overall operation of the road network and footpaths, with particular emphasis on road user safety before, during and after events. 2. An assessment of the cumulative impact on traffic and road safety of simultaneous events in the precinct; 3. Traffic analysis of the proposal for post-event closure of Driver Avenue and access operational plans anticipated.	Noted. This will be subject to further detail in the Stage 2 Development Application in relation to operational management of the new stadium.

1.4 Heritage Council of NSW

No.	Extract	Response
	Heritage Council of New South Wales	
	Statutory Heritage Register	
HC1	Although the Sydney Football Stadium building is not individually listed on any statutory heritage register, the subject site includes the State Heritage Register (SHR) listed item, the Busby's Bore located between Centennial Park to College Street, Sydney (SHR No 00568). The site is also located within the boundaries of the Sydney Cricket Ground HCA (Sydney LEP 2012), and is adjacent to the Sydney Cricket Ground - Members Stand and Lady Members Stand (SHR No 00353), at Driver Avenue. It is in the vicinity of Centennial Park, Moore Park, Queens Park (SHR No 01384) and other state and local heritage items and Heritage Conservation Areas (HCAs).	Noted. The Statutory and Non-Statutory heritage listings of the site and any other heritage items in the vicinity including conservation areas are identified and discussed in Section 2.0 of the Heritage Impact Statement at Appendix L of the exhibited EIS.
	Built heritage	
HC2	The Heritage Division notes that the Sydney Football Stadium is ranked as having high significance in the Sydney Cricket and Sports Ground – Conservation Management Plan – Draft (SCG CMP), prepared in 2013 by Godden Mackay Logan. It is further noted that although the Heritage Impact Statement (HIS) references the CMP in its assessment, a copy of the document has not been provided with the SSD submission. The HIS states that the CMP bases the site's heritage values on its historical significance as '…a venue for significant sporting matches, concerts and events over the years; for its historic associations with the architectural firm Philip Cox and Partners; for its aesthetic significance as a technologically advanced design and creative landmark in Sydney; and for its social significance as a large sporting venue...' The draft CMP includes policies for the retention and conservation of the high heritage significance of the Sydney Football Stadium and recommends that an SECP (Specific Elements Conservation Policy) be prepared for the stadium to guide any future management and adaptive works.	The draft CMP has not been finalised or approved by Sydney Cricket Ground Trust for submission to the NSW Heritage Division for endorsement, and as such is still a working document that has not been completed. Accordingly, the draft CMP does not have any formal status in the heritage assessment of the project. The draft CMP was reviewed as part of the heritage assessment process as it contains historical information pertaining to the site and a physical description of the whole of the site. These elements of the draft CMP are generally not in contention, although there are some chronological errors contained within the history. The archaeological potential/significance of the site as outlined in the draft CMP has been reassessed as outlined in Appendix M of the exhibited EIS. The archaeological sub-sections of the draft CMP were not considered to provide a full and accurate assessment of the site's potential to contain Aboriginal and non-Aboriginal elements. The draft policies for the retention and conservation of the Sydney Football Stadium (SFS) remain draft and are not supported by the Sydney Cricket Ground Trust or the Applicant. It is considered that the draft CMP does not substantiate the claim of high heritage significance for the SFS. Given that the existing SFS is not heritage listed at either a local or State level, the draft policies in relation to the SFS within the draft CMP are not commensurate with management of a non-heritage listed item. As an example, the draft CMP does not contain a comparative analysis of Tier 1 football/event stadiums of a similar age both within Australia and internationally. It is also important to note that the SFS has not been the subject of any Australian or International architectural awards and, as

No.	Extract	Response
		demonstrated in the comparative analysis at Attachment 7 of the Response to Submissions, whilst the SFS is representative of its time, it is not heritage listed. The Applicant notes that Cox Architecture does not object to the demolition of the existing stadium (refer to **Attachment 7** of Response to Submissions). It is for these reasons that the policies of the draft CMP pertaining to the high heritage significance afforded to the SFS are considered inaccurate.
HC3	The HIS contests the above assessment contained in the draft CMP and states that the significance of the existing Sydney Football Stadium primarily relates to '…its continuity of use and its intangible heritage value which relates to the long-term use of the site for sporting activities dating back to the late 1800s, and its visual dominance and significance as a stadium within the Moore Park Road Streetscape and as part of the wider SCG site', and not the stadium building itself. The HIS concludes that the proposed development would have a neutral impact on the heritage values of the site and surrounds. The statement is, however, not supported by any comparative analysis of similar types of stadium developments in Sydney and NSW or a comparative study of body of works by Philip Cox and Partners. The HIS lacks a comprehensive assessment of the heritage significance of the Sydney Football Stadium and the level of heritage impact posed by its demolition.	See response to comment HC2. A comparative analysis has been undertaken and is included as Attachment 7 to the Response to Submissions. This comparative analysis demonstrates that the SFS does not have a level of heritage significance that would warrant retention of the building or a formal listing.
HC4	Given the above noted inconsistencies in the assessments provided in the draft CMP and the HIS and the insufficient heritage assessment provided in the HIS, it is considered that further information should be sought. It is recommended that the Department of Planning and Environment (the Department) seeks the following information from the applicant prior to determining the application: • A detailed comparative analysis of similar types of stadium developments in Sydney and NSW and a comparative study of the body of works by Phillip Cox and Partners to further evaluate the significance of the Sydney Football Stadium building at State and Local levels. The additional assessment should be prepared by an appropriately qualified specialist on Modernist Architecture. • Amended HIS and proposal to address the findings of the above noted comparative analysis and assessment.	A comparative analysis has been undertaken and is included as Attachment 7 to the Response to Submissions. This comparative analysis demonstrates that the SFS does not have a level of heritage significance that would warrant retention of the building or a formal listing.
HC5	A copy of the draft CMP should also be sought given the considerable referencing the HIS makes to this report.	As per response to comment HC2, whilst the draft CMP includes useful information regarding the history of the site, (that was utilised in developing Appendix L to the exhibited EIS) it remains a draft document that has not been finalised or approved by the Sydney Cricket Ground Trust or endorsed by the Heritage Council. As outlined in response to comment HC2, the recommendations of the draft CMP are not supported in Appendix L to the exhibited EIS, which is the appropriate basis for heritage assessment for this project.
HC6	It is also noted that the Concept Proposal is for an enlarged footprint and envelope than the existing building, which has the potential to adversely impact on significant historic view lines from, to, and within the Sydney Cricket and Sports Ground (including the Sydney Cricket Ground - Members Stand and Lady Members Stand – SHR No 00353) and other state listed items in the vicinity (including Centennial Park, Moore Park, Queens Park – SHR No 01384).	The Visual Impact Assessment provided with the publicly exhibited EIS demonstrates that there would be no visual impact from Centennial Park or surrounds. The Addendum Visual Impact Assessment provided at **Attachment 12** of the Response to Submissions includes additional visual assessment of views from within the SCG, and similarly demonstrates that the visual impact would be moderate and acceptable.

No.	Extract	Response
HC7	As the subject site is part of the Sydney Cricket Ground HCA (Sydney LEP 2012) and is located in the vicinity of numerous local heritage items, early collaboration with local councils is recommended on mitigating impacts to these items and on urban design, visual amenities and landscape treatment associated with the project.	Noted.
	Heritage archaeology	
HC8	The Archaeological Assessment Report prepared by Curio Projects indicates that due to the extensive modifications for the current stadium the study area retains a low potential for archaeological remains associated with the former Engineers/Military Depot and the Sydney Sports Ground. It also notes that Busby's Bore is known to be present within the study site, including shafts 9, 10 and 11 and intervening shaft 4, however the exact locations of only shafts 9 and 10 have been able to be confirmed.	Noted.
HC9	The report notes that for the Stage 1 development, demolition of the current site is to ground level only and this will not impact archaeological information or Busby's Bore, but that impact may occur at later stages through the Stage 2 detailed design and construction of the new stadium including a basement. With regards to archaeological matters, this assessment is considered an appropriate level of assessment for Stage 1.	Noted.
HC10	*Recommended Conditions for Stage 1 relevant to historical archaeology:* As noted above, archaeological information is not anticipated to be impacted during Stage 1 as demolition is to ground level only, however the following recommendations are made to ensure that any future development of the site appropriately assesses and manages archaeological impacts: • All recommendations of the report entitled 'Archaeological Assessment for Sydney Football Stadium, Stage 1 Concept Design' prepared by Curio Projects, dated 5 June 2018 should be implemented by the proponent.	Noted.
HC11	Recommended Historical Archaeological Advice for future stages of this project. Busby's Bore is an item of Engineering Significance at a State Level recognised by its listing on the State Heritage Register. To ensure the next stage of the project does not harm Busby's Bore the following advice is also provided to the DPE to provide to the applicant for the next stage planning of detailed design: • Busby's Bore should be subject to additional investigation to confirm its precise locations within the site. This is essential to informing the detailed design stage to ensure this State Heritage Register item is protected and should occur as soon as possible. • Busby's Bore should be avoided by the project to ensure the significance of this item is retained. All measures should be considered to avoid this item from direct or indirect impacts, including obtaining the advice of a structural engineer. • An additional archaeological assessment or an amendment of the current archaeological assessment should be completed for all subsequent stages of the project, to assess the impacts of development on the archaeological information at the site. • An appropriate archaeological research design and excavation methodology should be prepared by a suitably qualified Excavation Director for review by the Heritage Council of NSW or its delegate for any works which will impact archaeological information or Busby's Bore.	The Applicant will seek to obtain approval from Sydney Water (owner of Busby's Bore) and the NSW Heritage Division to undertake further investigations to identify the location of the bore. During consultation undertaken with Sydney Water regarding impacts to the bore, there is a high interest from Sydney Water (Asset Owner) in archaeological investigation forming part of some of the works, if required, to allow for a better understanding and recording of how the bore functioned in areas where it is not fully formed (in contrast to the shafts). This has been confirmed by Sydney Water's Lead Heritage Advisor. It is anticipated that the majority of the bore itself consists of roughly cut channels/tunnels and trenches dug through the sandstone that is likely to have collapsed in areas. It is not expected to have a formed, structured tunnel, such as other significant infrastructure of a similar nature (i.e. the Tank Stream, Bennelong Drain). The interiors of the tunnel are not expected to have finished facing. To date, no archaeological investigation of the tunnel outside of the shafts has been undertaken, so therefore, the opportunity to scientifically investigate,

No.	Extract	Response
		record, analyse and interpret key sections of the bore should be considered and discussed as an option, should some impacts be required. We are going to commit to not building over the bore on DPE comments- should we amend the above para? It is agreed that an appropriate archaeological research design and excavation methodology should be prepared by a suitably qualified Excavation Director for review by the Heritage Council of NSW or its delegate for any works which will impact archaeological information or Busby's Bore.

1.5 Office of Environment and Heritage

No.	Extract	Response
	Office of Environment and Heritage	
	Biodiversity	
OEH1	The EIS indicates the site landscaping and tree planting will be detailed in the Stage 2 Development Application (Section 6.4.2, page 82). It notes it is proposed to enhance planting on the site with 95% of the new vegetation to be Australian native species (Section 5.1.5, page 59). The Urban Design Guidelines for the development specify priority should be given to using endemic species (page 166) but the list of potential tree species provided in the Arboricultural lmpact Assessment for the site include Hoop Pine (native to northern NSW and Queensland), Norfolk Island Pine (endemic to Norfolk Island), and lllawarra Flame tree. OEH recommends the site landscaping uses a diversity of native provenance trees, shrubs and groundcover species from the relevant native vegetation community (or communities) that once occurred at the site to improve biodiversity. There are numerous benefits in using a diversity of local native plants including: • preservation of the biodiversity values of the local area • provision of the most suitable food and habitat for local native fauna including nectar for pollinators (moths, butterflies, bees etc) which provide a food source for local native birds • a stepping stone for more mobile native fauna to move across the landscape.	Noted, proposed landscape species will be the subject of the future Stage 2 Development Application. The OEH recommendations will be considered as part of the preparation of this application. Refer to Final Mitigation Measure CP-BD2 at **Section 5.0** of the Response to Submissions Report.
OEH2	OEH notes that the EIS identifies the potential to re-establish vegetation suitable for foraging by the Grey-headed Flying-fox and the installation of an artificial microbat roost structure within the future landscape design, which will be the subject of the Stage 2 Development Application (DA). At Stage 2 DA stage it is recommended that advice from OEH be sought in relation to this aspect of the proposal.	Noted, this recommendation will be considered in the preparation of the Stage 2 Development Application.
	Flood	
OEH3	It noted that the project is in a preliminary stage and will be subject to detailed design and a Stage 2 SSDA application. Therefore, comment is not provided on the adequacy of flood risk analysis for the final redevelopment of the site as this will be subject of the Stage 2 SSDA application. It is expected that flood risk comments will be sought from OEH at the relevant time in the future.	Noted.
OEH4	However, it is necessary to stress at this stage of the overall plan for the site that there are significant overland flow issues that potentially increase flood risk to life and property. In this regard the Stormwater and Flooding Assessment Report (SFA) adequately investigates one possible in-principle mitigation option for the site. The report also adequately reviews existing flood risk modelling as well as undertaking further modelling specific to the site and considering ARR2016 methodologies.	The Stormwater and Flooding Assessment Report (Appendix P to the exhibited EIS) demonstrates that appropriate mitigation measures can be implemented through on-site design and infrastructure measures. The final resolution of overland flow will be subject to the detailed design subject to the Stage 2 Development Application, as confirmed in Mitigation Measure CP-SF1 at Section 5.0 of the Response to Submissions Report.
OEH5	Section 4.3 of the SFA (Flood Risk Management Recommendations) is a comprehensive summation of issues that will require detailed considerations at the Stage 2 DA stage of the overall redevelopment proposal. All of the recommendations are supported.	Noted.
OEH6	It is recommended the consent authority seeks further advice from OEH on floodplain risk management aspects at Stage 2 DA.	Noted, this recommendation will be considered in the preparation of the Stage 2 Development Application.

No.	Extract	Response
	Aboriginal cultural heritage	
OEH7	The EIS notes no sub-surface works are included in the Stage 1 demolition that would impact archaeology but it indicates there is potential for construction of the new stadium to impact Aboriginal archaeology during excavation, piling and other ground intrusive works which will be subject to detailed design and further assessment as part of the Stage 2 development application (page 102). The EIS includes a mitigation measure that an Aboriginal Cultural Heritage Assessment Report is to be prepared (ACHAR) and submitted with the Stage 2 Development Application (pages 113 and 117). OEH supports the preparation of an ACHAR.	Noted.

1.6 Sydney Airport

No.	Extract	Response
	Sydney Airport	
	Application for approval pursuant to s .183 Airports Act	
SA1	The application sought approval for the PROPERTY DEVELOPMENT to a height of 85.0 metres Australian Height Datum (AHD). In my capacity as Airfield Design Manager and an authorised person of the Civil Aviation Safety Authority (CASA) under Instrument Number: CASA 229/11, in this instance, I have no objection to the erection of this development to a maximum height of 85.0 metres AHD. The approved height is inclusive of all lift over-runs, vents, chimneys, aerials, TV antennae, construction cranes etc. Should you wish to exceed this height a new application must be submitted.	Noted. A further application has been submitted to Sydney Airport to include an allowance in the maximum RL for crane operation (RL 145.00 AHD). This level continues to be below the applicable airspace protection level for the site (RL 156.00 AHD) and accordingly it is not expected that any further issues would arise.
	Operation of construction equipment	
SA2	Sydney Airport advises that approval to operate construction equipment (i.e. cranes) should be obtained prior to any commitment to construct. Information required by Sydney Airport prior to any approval is set out in Attachment A. "Prescribed airspace" includes "the airspace above any part of either an Obstacle Limitation Surface (OLS) or Procedures for Air Navigation Services- Aircraft Operations (PANS-OPS) surface for the airport (Regulation 6(1)). The height of the prescribed airspace at this location is 156 metres above AHD.	Noted.
	Planning for Aircraft Noise and Public Safety Zones	
SA3	Current planning provisions (s.117 Direction 3.5 NSW Environmental Planning and Assessment Act 1979) for the assessment of aircraft noise for certain land uses are based on the Australian Noise Exposure Forecast (ANEF). The current ANEF for which Council may use as the land use planning tool for Sydney Airport was endorsed by Airservices in December 2012 (Sydney Airport 2033 ANEF). Whilst there are currently no national aviation standards relating to defining public safety areas beyond the airport boundary, it is recommended that proposed land uses which have high population densities should be avoided.	Noted. This comment is not applicable to the proposal.

1.7 Sydney Water

No.	Extract	Response
	Sydney Water	
	Building over or adjacent to stormwater assets	
SW1	Sydney Water is aware of the proposed redevelopment and the proposal must meet Sydney Water's building over and adjacent to the stormwater assets requirements. Sydney Water stormwater assets of greatest concern are the 900RC, 1350RC and 400VC part of the Moore Park- Sportsground Eastern Branch.	Noted.
SW2	As per Sydney Water guidelines, the applicant is advised of the following: • Consult with Sydney Water during the concept design phase. The guidelines provide the basis of our approval which includes but is not limited to the following: o No building or permanent structure is to be constructed over Sydney Water stormwater channels I pipes or within 1m from the outside wall of the storm water asset. Permanent structures include (but are not limited to) basement car park, hanging balcony, roof eves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply for unlimited depth and height. o An elevated II cross-section drawings must be submitted to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel and below the line of influence. o The Structural integrity of the new assets must not be compromised in future and it must be independent of any proposed building or permanent structures. • Once a concept plan has been agreed by Sydney Water, the design must be supported by: o Flood Model to demonstrate the asset does not cause flooding. Preferably a 2D Model using Councils flood model for this catchment. o Hydraulic Design to ensure the design performs with no surcharges.	Noted.
SW3	Sydney Water recommends that the applicant work closely with Sydney Water during the concept phase of this proposal. As are the current stands, the proposal does not meet Sydney Water's building over and adjacent to the stormwater assets requirements.	Noted.
	Water and Wastewater Servicing	
SW4	• There is adequate capacity in the water and wastewater network systems to service to the development site. • Amplification or extensions to the water/wastewater network may be required.	Noted.

1.8 City of Sydney

No.	Extract	Response
	City of Sydney	
	Overview	
COS1	**Cumulative impacts have not been taken into account** when determining effects. The new stadium envelope must not be assessed in isolation.	All relevant cumulative impacts have been considered in the EIS. Refer to detailed responses in following sections.
COS2	**Demolition consent must not be granted concurrently with any concept plan approval**. Demolition should only be considered following a detailed design assessment or a site-specific DCP. Planning risks of proceeding are high with a petition of more than 200,000 people against demolition and without bipartisan political support. The development is not in the public interest.	The EP&A Act includes specific provisions which permit: - A Concept Development Application to also include detailed proposals (and seek consent for) the initial stage(s) of the proposed development. It is commonplace for demolition to form part of such applications. - A Concept Development Application to satisfy any requirement under an environmental planning instrument to prepare a site-specific DCP. Preparation of a Concept Development Application is commonplace throughout the City of Sydney. The proposal is considered to be in the public interest for the reasons outlined in the EIS.
COS3	The established evidence of low attendances for most sporting matches compared to stadium capacity, builds in the **risk of increased concerts and major entertainment events**, not covered in the Environmental Impact Statement (EIS). There is a substantial risk that the primary operation of the venue as a sports stadium will expand to accommodate broader uses and generate return on investment.	The Concept Development Application makes clear that the existing limit of six concerts per annum would be maintained. The Mitigation Measure CP-NV3 at **Section 5.0** of the Response to Submissions confirms that the stadium will not host more than six concerts per annum, consistent with limit current applied under the noise restrictions for the existing stadium.
COS4	**There is insufficient public transport capacity to support enhanced attendance**. The light rail has effectively replaced buses and offers little net additional capacity given the extent of route served. Tier 1 stadium investment of this scale needs dedicated rail like Homebush. This broad concern was expressed in the 2012 Stadia Strategy.	The proposed stadium would not involve an increase beyond the capacity of the existing stadium (and hence maximum attendance), for which suitable transport arrangements are in place. The Applicant will work with the Moore Park Working Group, which includes the City of Sydney, Transport for NSW, the Centennial and Moore Park Trust, as part of the preparation of the Stage 2 Development Application to ensure that the detailed design and operation of the new stadium supports appropriate transport outcomes.
COS5	The parkland associated with Moore Park must remain free of vehicles and be enhanced with landscaping and tree canopy to improve its appeal. It is unacceptable that surrounding land owners such as the Centennial and Moore Park Trust must cope with **increased car parking demand generated by the development**.	Event parking within Moore Park managed by the Centennial Park and Moore Park Trust (CPMPT). The responsibility for any enhancements to Moore Park East is within the control and responsibility of the CPMPT.
COS6	**Traffic congestion has been incorrectly modelled.** The traffic study is grossly inadequate and seriously underestimates the volume of traffic generated by the size and the expected events of the proposal.	Refer to detailed responses in following sections. The traffic study is a robust and accurate assessment which has been undertaken to the requirements of, and in consultation with, Transport for NSW and the Sydney Coordination Office.
CO7	**Disruption effects for the surrounding community are unacceptable.** Noise exceedances, hours of operation and the request that the DPE create a discretionary arrangement to vary those hours are unacceptable.	The proposed hours of work for demolition are fully in accordance with the Interim Construction Noise Guidelines as required by the SEARs.

No.	Extract	Response
	Cumulative Impacts	
COS8	The stadium proposal cannot be considered in isolation when assessing community and environmental impacts in the Moore Park area and City surrounds. A credible assessment of these impacts must also consider: • protection of open public green space, trees and heritage • expansion and encroachment of stadium events onto Driver Avenue, Kippax Lake and the ANZAC memorial • commercialisation of public land • local traffic congestion, use of off-site car parking facilities and the follow on impact into the City of Sydney and surrounding communities during events • public transport capacity • precinct character • amenity • economic and environmental sustainability. Other proposed projects in the Moore Park precinct include the leased use of the Hordern Pavilion and the Royal Hall of Industries, muted proposals to redevelop the Entertainment Quarter and the Alexandria to Moore Park Connector. The cumulative impact of these approved and proposed uses need to be considered in any assessment of a new stadium.	- The proposal does not impact on any existing public green space, and provides for an increase in publicly accessible space. Key significant trees within the site will be maintained, and there will be a net increase in the number of trees on the site. Existing heritage items within the site will be protected, maintained and better interpreted as part of the new stadium. - All stadium activation is proposed to occur within land controlled by the SCSGT, and would not impact on Kippax Lake or the ANZAC memorial. - The land which is the subject of this application has a long history of being used for major sporting events, including the current SFS. The project will provide a significant improvement by creating opportunities for increased public access to the site during event and non-event days. - The proposed stadium would be no larger in terms of maximum patron capacity than the existing stadium. - The locality is benefiting from enhancements to public transport capacity through the future completion of the Sydney Light Rail, with event buses to continue to operate as required by TfNSW to ensure sufficient capacity is provided. - The SCSGT land, including the SCG and the existing SFS, has a long history as Sydney's major sporting precinct. The proposed development continues this character. - The proposed development will not result in any significant adverse amenity impacts on the surrounding community. - The new stadium is expected to deliver a number of significant improvements to operational efficiency and sustainability, including on-site renewable energy generation.
COS9	An expanded event calendar will result in sections of Moore Park continuing to be frequently used for patron car parking. This reduces access and usability of open space for wider public recreation.	The operation and management of event-day parking in Moore Park falls under the control of the Centennial Parklands and Moore Park Trust, who the Applicant will continue to work with as part of the Moore Park Working Group during the preparation of the Stage 2 Development Application.
COS10	The Urban Design Guidelines propose 'activation' of Driver Avenue during events, prompting crowds to gather across Driver Avenue and into the parklands. There is insufficient information in the EIS regarding the scale and type of 'activation' and whether this strategy will require redesign of the Kippax Lake parkland to accommodate event mode usage (as opposed to the community parkland usage that is proposed in the Moore Park Master plan).	An additional page has been added to the Guidelines to provide more detail around the nature of activities and activation that will take place in the public domain. Activation will be limited to the project site; the guidelines have been amended to more clearly articulate that objective and are included at Attachment 4 to the Response to Submissions.
COS11	As illustrated in Figure 2, the proposed stadium footprint is too large for the site to contain the full range of enhancements; and compliance and security requirements generated by the proposed use.	The proposed stadium is capable of being accommodated within the site and will be fully contained within land controlled by the SCSGT.
	Demolition must not be approved	

No.	Extract	Response
COS12	The planning, social and amenity risks of approving early demolition of the Sydney Football Stadium are unacceptably high. Demolition should not occur before the impacts of the final development can be fully evaluated and publicly disclosed. Early demolition of the existing concrete and steel structure would be highly disruptive to the community as well as the clubs and teams that use the existing stadium without the certainty of a detailed design and its impacts. Prior to and during consultation, a significant level of community dissatisfaction was registered with the demolish-and-replace proposal, evidenced by a 208,000 signature community petition against a new stadium on change.org. The City asks the DPE to consider the significance of the public interest under Section 4.15(1)(e) of the *Environmental Planning and Assessment Act 1979* given that a public infrastructure project, funded by public money, has produced such strong community opposition.	The exhibited EIS includes an assessment of the environmental, economic and social impacts of the Concept Proposal (including likely impacts arising from the future construction and operation) and Stage 1 Demolition, which finds that the proposal will not result in any significant impacts that would not be appropriately managed through appropriate mitigation measures and/or assessment as part of the Stage 2 Development Application. The proposed approach allows the demolition process to occur over several months whilst detailed design and assessment for the Stage 2 Development Application is being progressed. This will allow the earlier delivery of the new stadium and associated social and economic benefits.
	Risks of increased concerts and entertainment events	
COS13	According to the EIS, "the existing stadium currently limits itself to six (6) concerts/entertainment events per annum, which will not change. There will also be no change to the existing time limits for sporting, concert and other events". There is well-established evidence of low attendance numbers for most sporting matches at the stadium (excluding grand finals and one-off matches). Some estimates put the average attendance levels at just 40% or 17,000 of the maximum 42,000 capacity. According to the INSW Business Case summary, the assumed total annual attendance increase, with the 6 event restriction continuing, is in the order of 250,000 to 300,000 patrons. Based on the recent trends and a changing media landscape, the estimated patronage for sporting fixtures are overly optimistic. Continuing low patronage (in the face of potential ticket price increases) for sporting matches heightens the risk that a revised program of major entertainment events will be necessary to prop up the business case. This risk and development potential is intentionally omitted from the EIS and therefore cannot be assessed.	The Mitigation Measure CP-NV3 at **Section 5.0** of the Response to Submissions confirms that the stadium will not host more than six concerts per annum, consistent with limit current applied under the noise restrictions for the existing stadium.
	Transport and Access	
COS14	**Insufficient Mass Transit** The 2012 Stadia Strategy noted, *"Many stadia are compromised by poor public transport. Stakeholders noted that public transport accessibility is important to the success of stadia and this is difficult with a large number of decentralised venues".* Given the level of investment in the project, and the co-location of two Tier 1 stadiums (the stadium is situated next to the Sydney Cricket Ground), the proposal requires a much improved transit solution. Light rail is an effective neighbourhood public transit solution. However, for the Sydney Football Stadium, the light rail is proposed to replace major bus services with little net increase in capacity. It also has many other high volume passenger generators to serve such as Randwick Racecourse and the University of New South Wales. Given that INSW estimates an increase in annual attendance of	The Moore Park sporting precinct (SFS and SCG) will be serviced by a range of transport options, including: - Light rail (with a dedicated stop at Moore Park). Light rail will offer a significantly enhanced level of capacity for transport people to the SFS compared with the existing event bus arrangements, which have capacity to transport between 3,000 and 4,000 passengers per hour during peak times compared to 11,000 per hour on light rail - Bus (both regular Sydney Buses routes and special event buses) - Heavy rail at Central Station, which is walkable from the precinct with the capacity to accommodate over 50,000 people per hour. In addition, the SCG and SFS are located in close proximity to the Sydney CBD – with a number of people walking directly to the precinct.

No.	Extract	Response
	250,000 to 300,000 over a 49-52 annual event calendar, there is insufficient mass transit to meet the 'world class' experience envisaged by the Business Case and avoid an unacceptable increase in road congestion and continued car parking on the Moore parklands.	The transport assessment undertaken within Appendix J of the exhibited EIS, has demonstrated that, based on the transport mode shares under a range of different scenarios, the future transport network serving the precinct has the capacity to accommodate the expected travel demand to the SFS
	Traffic Movement	
COS15	**Vehicular Traffic** The estimated traffic generation by the new stadium is unacceptable and unsustainable. The redevelopment of the new stadium does little to reduce reliance on private vehicle journeys or encourage a modal shift to active and public transport. The ongoing availability of existing car parking spaces will continue to attract people to drive to the stadium (as reflected in the survey statistics of the submitted traffic report). In essence, the redevelopment predicts and plans for the status-quo. The traffic report provides an overview of current travel behaviours as a means of understanding how people arrive at the stadium. The results confirm that driving is the dominant mode of travel to the Sydney Football Stadium, with approximately 66% of respondents arriving by car as a driver or passenger. This is an unsustainable level of private vehicle reliance for a Tier 1 stadium in a dense urban setting - even without the anticipated increased patronage. Nevertheless, the application proposes 55,000 patrons during event mode, which will attract greater peak numbers and increased traffic movements. With 43% to 66% of people arriving by private vehicle and an average car occupancy of 2.7 persons (as indicated in the traffic report), a standard event will generate vehicle demand for approximately 8,750 to 13,400 parking spaces. This significantly exceeds the car parking capacity of the site and gives rise to the permanent reliance on surrounding sites to absorb parking including local residential streets as far as Surry Hills and Bondi Junction. Although the Sydney Football Stadium Redevelopment Transport and Accessibility Strategy (May 2018) proposes no increase in the on-site car parking, the City predicts significant risks of future car parking increases. The enhanced redevelopment may necessitate car parking increases as envisaged by the Moore Park Master Plan 2040 without the convenience of mass transit. There is significant and long-standing community objections to on-grass car parking and the Centennial Park and Moore Park Trust's plans proposals for expanded permanent car parks. Most concerning is that the Centennial Park and Moore Park Trust has shown a long- standing desire to provide more formalised parking on the site. In 2011, the Trust proposed a new 2,500 car parking structure, followed in 2015 with some 6,000 additional permanent parking spaces. Two large underground parking stations were proposed on the western side of Moore Park (between the Eastern Distributor and Anzac Parade) with collective car parking for 3,000 vehicles. And, four-storey car parks were proposed for Moore Park Road and the southern end of Moore Park.	The SFS redevelopment provides an opportunity to heavily promote to patrons, staff and visitors the sustainable modes of accessing the SFS and strongly encourage travel behaviour change. A number of travel demand management measures have been identified to reduce the private vehicle impacts arising from the proposed development as outlined in Section 5 of Appendix J of the exhibited EIS. These will be further developed as part of the Stage 2 Development Application Transport mode share surveys undertaken for the study indicate that between 37% and 66% of people currently arrive to the stadium by private vehicle. The proportion of people driving reduces as the stadium attendance increases. Importantly the proposal involves no increase in parking in the precinct, nor will there be an increase in venue capacity compared to current conditions. Refer to Attachment 5 of the Response to Submissions. As the transport surveys indicated, as total attendance at venues increase the private vehicle mode share decreases. As forecast in Table 8 of the transport assessment prepared for the project, under a 'full event' scenario it is expected approximately 15,000 people will arrive to the precinct via private vehicle which equates to approximately 5,500 vehicles. This quantum of vehicles is equivalent to the number of formal parking spaces in the precinct. No increase in car parking is proposed, or planned, as part of the project. As outlined in section 4.7.1 of Appendix J of the exhibited EIS, the Moore Park Masterplan 2040 proposes the gradual removal of parking on green space in the precinct (i.e. EP2 and EP3). The strategy however acknowledges that such measures will not be implemented until supplementary parking in dispersed locations (such as the Entertainment Quarter, E.S. Marks Athletics Field, Moore Park Golf and the SCG) has been created – thereby ensuring there is no net loss of event related parking.

No.	Extract	Response
	In view of the above points, **the traffic study is grossly inadequate and significantly underestimates the volume of traffic generated by the size and frequency of events. Moreover, the intentions of the Centennial Park and Moore Park Trust to expand vehicular parking within the precinct. As such, the study must be rejected.** Any additional permanent parking around the stadium will encourage more people to drive across the greater metropolitan area towards Moore Park, contrary to best practice. During an event, the site is served by some 6,000 car parking spaces. Most of this parking will load and unload within a two hour window before and after the event. This equates to some 3,000 trips per hour, or four saturated traffic lanes. Event traffic already congests busy major road corridors such as Oxford Street, Anzac Parade, Moore Park Road, Cleveland Street as well as the Eastern Distributor and Sydney Harbour Tunnel and Bridge. This has flow on effects on a number of major bus routes. People living and working in the areas surrounding the stadium experience the impacts of event traffic, which often brings local roads in Surry Hills, Redfern, Waterloo, Zetland, Kensington, Paddington, Darlinghurst and the City Centre itself to a gridlocked standstill. The applicant's SIDRA modelling result suggests that, "intersections were found to generally perform acceptably during the surveyed periods". However, this analysis was based on survey data for particular occasions only. Critically, the generated traffic, such as the traffic demand from the new stadium, was not included in the model. Therefore, the traffic impact from the stadium was not properly analysed. **The submitted traffic analysis is deficient and therefore unacceptable.** Based on current mode share reported in the applicant's traffic report (around 66% arriving by car), the SIDRA modelling results underestimate and misrepresent the true traffic/congestion scenarios in the adjacent network. To be precise, the traffic modelling reflects traffic arriving before the event - when there is usually a broader timeframe for visitors entering the stadium. Departure traffic after the game is more critical than the traffic on arrival as this is when a huge traffic volume is injected into the network from a single source in a short period of time. Therefore, to understand the network performance accurately a similar traffic modelling exercise and analysis must be based on after-sports events. In conclusion, the submitted traffic modelling is grossly inadequate and does not pick up and/or predict the probable traffic/transport consequences from the stadium redevelopment. Given the scale and context of the site, the transport impact study needs to be completely reviewed and re-modelled in order to properly understand the traffic impacts. This includes both Traffic Network Modelling around the subject site and Microsimulation/Intersection Modelling.	The proposal involves no change in the overall stadium (seated) capacity of 45,000 people, or concert capacity of 55,000 people. In this context, it is expected that traffic conditions in the precinct (following the completion of the new stadium) will improve compared to current conditions for the following reasons: - Improved public transport access through the introduction of the CBD and South East light rail - Expected reduction of special event buses that will serve the precinct due to the opening of light rail. This will reduce the number of vehicles on the road network - Greater promotion of sustainable transport modes Given the above points, the generated traffic from the new stadium is likely to be less than that currently generated by the existing stadium. The traffic modelling in the transport assessment took the conservative approach however that traffic volumes in future would be equal to current conditions. For further detail in relation to traffic volumes and SIDRA modelling refer to Attachment 5 of the Response to Submissions.

No.	Extract	Response
COS16	**Servicing** The application lacks adequate detail regarding the number of parking spaces, size of the largest vehicle, time of day for the service operation, and frequencies to allow a proper assessment of the proposal. A Road Safety Audit and Management Strategy has not been provided to manage the proposed interaction between pedestrians and vehicles on Paddington Lane and access from Driver Avenue to the stadium. Consequently, an assessment of impacts arising from the new stadium cannot be properly understood.	The proposal for the new stadium includes an improved arrangement for service vehicles allowing greater accessibility and circulation within the stadium site. A new basement car park with approximately 50 spaces will predominantly be used for service and VIP vehicles. Paddington Lane will not be used for servicing during events. Further details around the operation of the car park and loading area will be provided as part of the Stage 2 DA for the site.
COS17	**Bicycle Facilities** The traffic reports suggests that bicycle parking will be provided for 5% of permanent stadium staff with approximately 100 visitor bicycle parking spaces for patron use, equating to 175 spaces. Nevertheless, the proposal seeks a maximum capacity of 55,000 patrons and 1,500 staff. As such, the indicative bicycle parking rates represent 0.3% of the overall stadium capacity. This is unacceptably low in view of the extensive regional and local bicycle network in which the stadium is located. Further, the commitment by the applicant to "take advantage of this good connectivity by ensuring cycling is better promoted as a mode of transport to the venue". The lack of bicycle facilities proposed by the applicant is evidence of their intention to maintain the status-quo for travel to the stadium and support the continuation of unsustainable transport modes.	The proposal seeks to significantly increase the number of bicycle parking spaces within the precinct. Currently there are approximately 50 spaces, this will increase significantly (dependent on further planning to be undertaken as part of the Stage 2 Development Application). At a minimum 100 visitor bicycle parking spaces will be provided – more than double the current provision. Facilities will be provided in accordance with Australian Standards 2890.3 2015 Bicycle Parking Facilities.
COS18	**Walking** The pedestrian access strategy is based around shifting the majority of access from Central Station (via Foveaux and Fitzroy Streets) to Devonshire Street. The report suggests the Devonshire Street route might be preferred as it has less conflict with traffic and will be associated with the new light rail route. Nevertheless, it is a 1.8km travel distance compared to the 1.5km Foveaux/Fitzroy Street route, and the lone established pattern of access will be difficult to overcome. Pedestrian access form Kings Cross station (distance of 1.8km) is ignored. Further analysis is required to determine how people currently walk (via Foveaux), the existing barriers (South Dowling lights), and what improvements are planned (via Devonshire) or should be planned. The City is also concerned that despite public domain improvements to Devonshire Street associated with the light rail, the new footpaths are not designed to accommodate the increased pedestrianisation generated by stadium crowds. The application fails to plan for walking connections between the new stadium and Central on both Devonshire and Foveaux which will be used by pedestrians. Works required to improve pedestrian access to the stadium from Central Station and Kings Cross station have not been proposed or funded. Therefore, the DPE should consider a cautious approach to predictions of increased pedestrian movements made within the traffic report as this mode of travel is less likely where there is insufficient infrastructure to support it.	It is acknowledged that many people walking between the SFS and Central Station will continue to use the Foveaux Street / Fitzroy Street route as their primary mode of travel. Given however the significant improvement in the walking environment on Devonshire Street, particularly widened footpaths, improved lighting and grade separated pedestrian crossing of Anzac Parade (i.e. Tibby Cotter Bridge), a number of people are likely to switch to this route despite the slightly increased distance. The proposed redevelopment of the Sydney Football Stadium does not increase the capacity of the stadium. Therefore, the proposal would not result in any increase in the maximum number of people arriving at the precinct. Existing pedestrian infrastructure currently accommodates pedestrian movement to the site, and the Applicant will continue to work with Transport for NSW, the CMPT and the City of Sydney through the Moore Park Working Group to identify opportunities to further improve pedestrian access to the precinct. Refer to Mitigation Measure CP-TA6 and CPTA2 at Section 5 of the Response to Submissions Report. The availability of these two walking routes (Foveaux and Devonshire) provides suitable capacity to accommodate pedestrians walking between Central Station and Moore Park. Under a 'double header' scenario (95,000 people in the precinct), it is forecast approximately 20,000 people would walk between Central Station and Moore Park.

No.	Extract	Response
		The route to Kings Cross Station is via Flinders Street and South Dowling Street. The travel surveys undertaken for this project indicate very few people catching the train to Kings Cross and walking to the venue – fewer than 0.1% of all respondents.
COS19	**Safety and security of people movement** As large numbers of people enter and exit a stadium in a relatively short period of time, it is crucial that these movements are provided for with sufficient well designed space for their safety and security. The FIFA Football Stadiums Technical recommendations and requirements [FIFA requirements] states clearly that *"the safety of all those using a football stadium must take priority over all other considerations in the design and management of the stadium".* The FIFA 'public access and egress diagram' (Figure 3) clearly illustrates that large spaces are required around stadiums for secure and safe movement. As evidenced in Figure 2, The proposed envelope significantly constrains these essential movements. Separated access is required for various groups including: spectators, players and officials, media, emergency vehicles and VIPs. The site restrictions only allow three entry points only. However, these are not evenly distributed around the stadium. It is clear that the full range of separated entry conditions would be difficult if not impossible to provide. The proposed stairs to Driver Avenue present a safety hazard for patrons entering and leaving the stadium. The movement on stairways particularly the downward movement poses a potential risk to crowds both in normal circumstances, such as at the end of an event or in an emergency. The effects of pushing and congestion are potentially dangerous if the crowd suddenly surges forward for any reason or an individual suddenly changes direction. The site planning has placed the major entry to the stadium as a stair entry with a rise of over four metres contrary to the UK Guide to Safety at Sports Grounds Spaces for barriers are required at the head of the stair and adequate space to control flow is required at the base of the stairs. The drawings (Figure 3) illustrate inadequate space for the stairs (i.e. no space is provided at the base of the stairs) and that the space required for safety and security and cannot be provided. ***Driver Avenue steps and universal access*** There is a four metre level difference between Driver Avenue up to the concourse via a wide set of stairs. Universal access is via a secondary lift zone, details for which are not described. A precedent study for best practice design and evidence of existing stadiums where stairs are used at the main access should be prepared and submitted for consideration. Stairs must provide generous landings and gathering spaces including compliance with AS1428, and ensure the design and delivery of universal and dignified path of travel for people with disability (both during an event and on a day-to-day basis).	**Safety and security of people movement** Section 6.4.1 of the EIS states: *The envelope has been determined based on a 'loose-fit' approach to allow scope for further design development and to provide scope for innovation in the façade design as part of the competitive design process. It is not anticipated that the entire volume of the envelope will be required for the final detailed design, but rather the 'loose-fit' approach provides for a 'worst case' assessment of the built form.* As such the envelope does not represent a built form. The Urban Design Guidelines included at Appendix C to the exhibited EIS includes sections which demonstrate how the detailed design of the stadium may include greater public domain areas at the ground plane to accommodate pedestrian access and egress. The Applicant is committed to developing a stadium that addresses all relevant safety standards. The FIFA Football Stadiums Technical recommendations and requirements is not the leading authority in stadia design standards and is developed for one specific code. A number of guides have been utilised to inform the concept envelope and will continue to be referenced in developing the detailed design, including: • The draft 6th edition of the Green Guide • The latest Counter Terrorism Committee guides for crowded places • ISO IWS 14 2014 Vehicle Security Barriers In addition, a number of stakeholders have been consulted and will continue to be consulted as the design progresses, including: • Expert advice from major event security experts, pedestrian planning and life safety experts, certifiers, the UKs Sports Ground Safety Authority (Authors of the 'Green Guide', Guide to Safety at Sports Grounds). • Consultation with the NSW Police Counter Terrorism and other NSW emergency services. ***Driver Avenue steps and universal access*** The final design of the public domain, including all stairs and universal access will be compliant with all relevant standards and included in the Stage 2 SSDA. The Stage 2 Development Application will be accompanied by an accessibility review to outline the project's compliance with the applicable access standards.

No.	Extract	Response
	Disruption	
COS20	**Construction noise** The submitted Construction Noise and Vibration Management Plan (CNVMP) notes that there will be exceedances of the noise management level during the demolition of the stadium. The highest levels are predicted to occur during the early works and during the use of equipment including the mulcher, concrete crusher, excavator and rock breakers. The childcare centre noise management levels are set at 70dBLAeq, 15 minute. This is considered excessive and will impact on the ability for centres to provide outdoor play and 'rest' times for children. A sufficiently detailed CNVMP must be submitted to the DPE and Council's Health and Building specialists for review in order to understand the extent of construction noise impacts.	As outlined in Appendix K of the exhibited EIS, existing ambient road traffic noise levels along Moore Park Road are close to 70 dBA, with an average measured daytime ambient L_{Aeq} noise levels of 68 dBA at 256 Moore Park Road. The noise management levels for the CC2 – Kira Child Care Centre are therefore considered reasonable in the context of the existing acoustic environment. At the CC2 – Kira Child Care Centre, the highest predicted construction noise levels of 66 dBA are predicted to occur during the demolition of the stadium, conservatively based on all equipment operating simultaneously. The predicted noise levels are therefore 2 dB(A) below the existing ambient noise levels at the childcare centre and would result in only a 'minor' increase in overall noise levels. As part of the mitigation measures, unattended noise monitoring is proposed for key receptors (S1-NV5).
COS21	**Construction hours** The application proposes construction hours between 7am to 6pm, Monday to Friday and 8am to 1pm on Saturdays. No work is proposed on Sundays or public holidays. The proposed construction hours are outside the standard hours permitted outside the CBD by the City of Sydney and will impact upon adjacent residential uses. The application further proposes that the DPE create a discretionary arrangement to vary construction hours under 'extenuating circumstances'. This is intended to circumvent the standard planning process which requires preparation of an acoustic assessment, public consultation and submission of a planning application.	The proposed construction hours are consistent with the standard hours set out under the Interim Construction Noise Guideline as required by the SEARs.
COS22	**Dust** The City is concerned about the proposed method for assessing dust impacts generated by the demolition. The Construction Demolition Management Plan acknowledges that dust emission will occur through the duration of work with on-site concrete crushing the main cause of these emissions. However, the 'effective management' proposed to mitigate emissions and maintain acceptable dust levels includes "daily and weekly visual surveillance". This is completely unacceptable. The plan must include detailed methodology for the mitigation of dust impacts generated by concrete crushing and complaint management procedures.	An Air Quality Impact Assessment has been completed as is included as Attachment 11 to this Response to Submissions. This assessment concludes that following the implementation of mitigation measures (S1-CM1, S1-CM8/9)), the residual effects of dust from the project are expected to be not significant and to have a low risk of unacceptable air quality impacts.
	Ecologically Sustainable Development	
COS23	The switch from the previous position of retrofit and upgrade to full demolition of the stadium announced in November 2017, is the most unsustainable and carbon intensive course of action justifiable in ecological terms. The City has expectations of a commitment to a "better than current" performance for the redevelopment of the SFS, this is best understood in terms of: • Will this development increase or decrease total energy demand, carbon emissions and mains potable water use compared to existing development at the site? (utility bills will exist for the site so this data will be confirmed) • How does this proposal move NSW towards its Net Zero by 2050 aspirational target? Wherever the LEED method proposes to model against a "reference building', the proponent must use the existing development as the reference building, not a hypothetical reference point. This is the most robust way to assess whether the new proposal is moving NSW toward or away from sustainability.	The decision to demolish and reconstruct the stadium is outside of the scope of this application. The ESD Strategy contained at Appendix N of the EIS is a forward-looking document which is working to ensure that the future stadium meets its sustainability goals. A comparison between a stadium designed in the 1980's with a stadium designed to modern standards in terms of sustainability and the requirements for reporting is not a like for like comparison. The EIS at section 2.2 outlines the deficiencies of the existing stadium and the requirements for a modern-day Tier 1 stadium. A comparison for uses such as a commercial office building could be undertaken for buildings with a 30 year difference in design because the main use and

No.	Extract	Response
		inclusions of the building remain the same within that period. Stadia design has developed significantly during the period from which the existing SFS was constructed, thus comparing the energy and water consumption between a 1980's designed stadium and a modern day stadium would not be suitable. The project is, however, committed to achieving a much higher level of energy efficiency than the existing stadium. There is a firm commitment to efficient lighting, efficient HVAC, intelligent façade design and onsite renewable energy production. While the overall energy consumption will be higher, so too will be the level of amenity and usable space. In adopting the LEED rating scheme it is not possible to nominate an existing building to use as the reference design. The LEED standard, by necessity, outlines prescriptive approaches which must be followed to ensure that all projects that apply the rating scheme are assessed using the same metrics.
COS24	**LEED Rating scheme** The proposal to use LEED as the rating framework for the redevelopment of the SFS raises concerns. LEED certification is considerably weaker on energy and related greenhouse gas emissions than established local energy and greenhouse assessment methods. This is due to LEED's reliance on ASHRAE 90.1 to assess energy efficiency improvements. The fundamental limitation of ASHRAE 90.1 is that it does not measure energy savings by relative greenhouse gas impacts (as per NABERS) or energy demand (as the Section J of per National Construction Code (NCC)), but instead by economic cost. This means that a solution that saves money, such as optimising cost tariff structures, can meet the credit without any actual energy saving being achieved. On ecological grounds, the application involving demolition should be refused. It fails to specify how LEED will deliver a best practice energy and carbon outcome. A specific Energy Modelling report (comparing existing with proposed) would be more value to the proponent and the City. Over compliance against NCC 2019 minimum standards across all JV3 and /or DTS elements is required but not proposed. Wherever the LEED method proposes to model against a "reference building' then the proponent fails to use the existing development as the reference building in favour of a hypothetical reference point. This does not provide a realistic way to assess whether the new proposal is moving NSW toward or away from sustainability.	The international nature of the SFS means a LEED rating is the most appropriate tool. LEED is a holistic sustainability rating scheme. The stadium is committed to achieving a certified Gold rating. This will require the stadium to implement initiatives across the full spectrum of sustainability including transport, water, land use, materials and energy consumption. Finally, the ESD Strategy commits to exceeding NCC energy efficiency requirements. The energy assessment methodology used by LEED does use economic cost as the final metric, but this cost captures energy consumption and GHG emissions. By using cost, ASHRAE 90.1 (and therefore LEED) is allowing for a more nuanced assessment of the impact of the building on the GHG emissions of the electricity network. The use of more electricity during peak network times (reflected by higher tariffs) directly contributes to the required capacity of the electricity grid. Older and less efficient generators are required to continue to operate (and more generation capacity constructed) to meet the peak demand. It therefore follows that by using cost as a metric, and further rewarding projects which reducing their energy use during peak demand, LEED is promoting a more focussed and effective outcome. It should also be noted that ASHRAE 90.1 is a much more rigorous standard than the Green Star GHG Calculator guide and stipulates much more stringent minimum energy performance requirements be met. Ultimately it is 'harder' to achieve points adopting this standard and it therefore forces project to do more to reduce their energy consumption. It is worth noting that ASHRAE 90.1 is the most widely used energy modelling standard in the world.

No.	Extract	Response
		The targeted rating of LEED Gold represents national excellence in sustainable design and is a clear method of demonstrating how the stadium is committed to moving toward sustainability. In adopting the LEED rating scheme it is not possible to nominate an existing building to use as the reference design. The LEED standard, by necessity, outlines prescriptive approaches which must be followed to ensure that all projects that apply the rating scheme are assessed using the same metrics.
COS25	**Environmentally Sustainable Design Strategy Report** The report states that the project is committed to achieving a higher level of energy efficiency than the current stadium. However, it is unclear whether the project will perform better in terms of total per annum energy consumption and greenhouse gas emissions compared to the current usage. The office space proposed in the stadium is predicted to be less than 2000sqm in total size—it is noted that the NABERS threshold is now 1000sqm for commercial office space. It is appropriate to achieve a 5.5 Star Energy rating in line with anticipated NCC 2019 standards. The proposed target of 10% of operational energy being derived from onsite renewable energy sources appears to be unsupported by an evidence base. 10% is also low given many days of lower than maximum site operation (i.e. no event days) if solid investment in onsite storage is made. An Energy Model should be provided to predict building performance. The Water Principle in the report states that the stadium will use 20% less water than a stadium designed to achieve 'standard practice'. The obvious reference is to use the existing building with the 20% saving applied against the existing building. There is no better reference point than the current building and any reluctance to accept this demonstrates a weak sustainability position. If LEED cannot cope with the existing stadium as the reference building then the tool is not considered appropriate for the purpose of this project. Rainwater harvesting for reuse on the site (i.e. for toilet flushing and non-pitch landscape irrigation) is not addressed within the application. It is also unclear whether there is any intention to capture stormwater. The significant embodied energy of the relatively recent stadium is lost through the considerable energy used during the lengthy demolition. Further, the embodied energy of significant concrete works will be the most significant material impact of the construction. Statements relating to LEED rating do not answer a key material question – will emissions from concrete be reduced, compared to the existing situation? A clear commitment to reducing the greenhouse gas emissions associated with this very large generation of concrete usage has not been provided. GreenStar Concrete Credit is the minimum ESD expectation.	The stadium is committed to achieving a higher level of energy efficiency, but is not committed to performing better in terms of overall energy consumption. As detailed in the response to comment COS23, the redeveloped stadium will include significantly more amenities and facilities and will not be a 'like for like' replacement with the existing stadium. The comments regarding the energy efficiency of the proposed office space are noted. This will be further developed with detailed commitments provided at the Stage 2 Development Application. The proposed stadium includes a significantly larger quantity of amenities and facilities and as such comparing the water consumption of the new facility against the old is a meaningless comparison. Please note that the new stadium will be constructed with significantly more efficient fittings and fixtures, as well as extensive water capture and reuse. The ESD Strategy presents a clear commitment to rainwater collection and reuse on site. Rainwater will be collected from the roof and used for toilet flushing, cooling tower use and landscape irrigation (availability permitting). The ESD Strategy presents a clear commitment to a detailed analysis of the Life Cycle of all building materials used within the proposed stadium, including concrete. This will be used as a design tool to refine the design and provide the design team all necessary information to make the best choices during the design process. The project has also committed to diverting at least 90% of demolition waste from landfill, with existing concrete on the site to be reused firstly on site wherever possible. The comment relating to the use of the Green Star concrete credit to demonstrate best practice for concrete design (in addition to the Life Cycle Assessment) is noted. This will be further explored during the Stage 2 DA.

No.	Extract	Response
	Tree Removal and Landscaping	
COS26	The EIS and SSD description are misleading in suggesting that only 28 trees are proposed for removal noting that 'Tree 124' consists of a group of 8 individual trees. This should be corrected by both the applicant and DPE to accurately reflect the actual number of trees identified for removal.	The tree numbers used within the Arboricultural Impact Assessment originate from the Tree Management Plan prepared in 2016 for the Sydney Cricket Ground and Sports Trust. For consistency, the numbering for the Tree Management Plan was used in the Arboricultural Impact Assessment. Tree 124, a group of 8 trees, was assessed as group as they had been planted as semi-formal row and would ideally be managed as single functioning unit. In this regard, the row of trees has higher landscape significance than the individual component specimens. Nonetheless, without tree groups, a total of 34 trees are to be removed.
COS27	**Deep soil and landscaping** The indicative landscape plan sets out the stadium, trees retained and removed for development, and new trees to the perimeter of the site. There is no information on the species, pot size or whether existing trees removed will be transplanted (e.g. Tree 124 group of Ficus). The proposal includes a "…basement which houses back of house and servicing zones for the stadium above. The footprint of this basement limits deep soil areas available for the planting of mature or large scale trees." (SJB p 93) The indicative landscape plan does not include proposed deep soil areas. There is insufficient information to determine the adequacy of deep soil provision. A holistic design review is required to determine existing deep soil within the site boundary and the proposed deep soil provision to increase the extent of large plantings and tree canopy	The group of eight *Ficus microcarpa 'Hilli'* Hills Weeping Fig (Tree 124) is not considered ideal for transplanting due to the crown form of the trees which have been subject to partial suppression from adjacent trees within the row. Although mature Fig species are considered tolerant of transplanting, this process subjects a tree to significant physiological stress, a reduction in vigour and a predisposition to pests and diseases. The recovery time from the transplanting process can extend over a number of years and it cannot be guaranteed that a tree will return to its former health and vigour. Arguably the removal and replacement of Trees 124 with healthy, super advanced size specimens (within an appropriate growing environment) should result in healthier trees with a longer Useful Life Expectancy which would provide a greater contribution to the canopy cover of the site over the long term. Noted. The site currently includes 1,271sqm of deep soil area. Some of this area especially adjacent to Moore Park Road to the north of the stadium does not currently feature significant planting. The Concept Plan includes 3,180sqm of deep soil area surrounding the stadium. The final quantum/size of trees and deep soil areas/planting are subject to detailed design as part of the Stage 2 Development Application.
COS28	**Arborist report and transplanting existing fig trees (Tree 124)** The legacy of tree-lined boulevard on Moore Park Road and Driver Avenue will be eroded and significantly impacted by the proposal to remove more than 28 trees. Trees recommended for removal include a significant group of eight Ficus macrocarpa var. hillii (Hills Weeping Figs) with high priority retention value (Tree 124). The group is located between the stadium and buildings to the north-west and should have equal importance to Tree 125. The group of trees provides a dominant and noticeable canopy coverage and shade in the public domain.	The tree canopy along Moore Park Road and Driver Avenue comprises of plantings within Moore Park, the surrounding the SFS carpark and street trees along Moore Park Road, none of which are proposed for removal. The group of eight *Ficus microcarpa* 'Hilli' Hills Weeping Fig (Tree 124) are only partially visible from Moore Park Road and Driver Avenue. As a row these make a significant contribution to the canopy cover of the site and meet the criteria to be allocated a Retention Value of *Priority for Retention.* However, unlike Tree 125,

No.	Extract	Response
	The Arboricultural Impact Assessment provides a detailed assessment of existing trees and justification for removal for development. The report notes the following points: With exception of Tree 125 there are few outstanding examples of species and tree canopy cover is low. A well-formed and well-managed canopy is an extremely valuable asset to any site, not only from a landscape /amenity perspective, but also due to the broader ecosystem services…which trees provide. The SFS redevelopment provides an opportunity to improve the overall quality and value of its tree population and significantly increase the site's canopy cover. This requires opportunities for new tree planting (and the infrastructure that supports them) to be identified early in the development process. It is understood the landscape design will form part of the Design Excellence process for the detailed design. Tree planting details, locations, species and sizes will be included in the Stage 2 DA. (AIA p 10). Tree 124 is considered a significant group of 8 Ficus macrocarpa var. hillii (Hills Weeping Figs) with high priority retention value. Each tree is 12 metres tall with a crown spread of 7 metres. Removal of the trees will have a negative impact on the site and broader parklands. Moreover, is contrary to the objectives of Eastern City District Plan for increasing the urban tree canopy and expanding the Greater Sydney Green Grid.	the trees do not meet the standard criteria (based on historical, cultural, social, ecological or outstanding aesthetic appeal) to be classed as 'significant'. The group of eight *Ficus microcarpa* 'Hilli' Hills Weeping Fig (Tree 124) were planted as part of the original Sydney Football Stadium development in 1988 and can be seen as relatively small trees in historical aerial imagery from 2000. The single *Ficus macrophylla* Moreton Bay Fig (Tree 125) is thought to be of a similar age to the other significant Figs associated with the formative years of development of Moore Park circa 1900. The group of eight *Ficus microcarpa 'Hilli'* Hills Weeping Fig (Tree 124) is not listed on the City of Sydney Register of Significant Trees. Tree 125 is listed on the City of Sydney Register of Significant Trees. To mitigate the impacts of tree loss the Applicant undertakes to replace trees at a ratio of 1.5:1 utilising a variety of pot sizes. This has been included in the Mitigation Measure CP-BD3 at Section 5.0 of the Response to Submissions Report.
	Design Excellence Strategy	
COS29	**Structure and terminology** Parts 1, 2 and 3.2 of the Design Excellence Strategy are outside of the scope of the matters required for inclusion in a Design Excellence Strategy prepared in accordance with Provision 1.2 of the City of Sydney Competitive Design Policy (the Policy). Part 1 and 2 is information that would be included in a Competitive Design Process Brief. The following comments are limited to Part 3 of the Strategy which address the relevant matters as stated at provision 1.2 of the City of Sydney Competitive Design Policy (the Policy).	Provision 1.2 of the City of Sydney Competitive Design Policy does not operate to restrict the inclusions of matters within a Design Excellence Strategy. Appendix D- Design Excellence Strategy of the exhibited EIS addresses comments made by Government Architect NSW and has been developed to the satisfaction of Government Architect NSW as required by the SEARs.
COS30	**Design integrity process** Section 3.2 of the Strategy titled Design Integrity Process states the continuation of the role of the assessment panel (Selection Panel) following the competitive process through the design development phase. As noted above (under structure and terminology), this process sits outside the scope of the matters required in a strategy. The Strategy should confirm and clarify the proposed Design Integrity Process is in addition to and does not override the requirements of the design integrity provisions at provision 5.1 of the Policy.	Appendix D- Design Excellence Strategy of the exhibited EIS addresses comments made by Government Architect NSW and has been developed to the satisfaction of Government Architect NSW as required by the SEARs. The provision of a Design Integrity Panel is seen as a positive commitment that will ensure the maintenance of design integrity throughout the process. The provisions of Section 5.2 of the Policy only require the convening of a Design Integrity Assessment prior to the lodgement of the Stage 2 application. The process proposed in Appendix D- Design Excellence Strategy section 3.2 allows for ongoing interaction with the competition jury to ensure maintenance of the integrity of the design throughout all stages.
COS31	**Urban Design Guidelines** The Design Excellence Strategy indicates that the future designs submitted as part of the competitive design process will be assessed against the Urban Design Guidelines prepared by SJB Architects (along	Noted.

No.	Extract	Response
	with the requirements of Sydney LEP 2012 and the principles outlined in the Government Architect's "Better Place – An Integrated Design Policy for the Built Environment of New South Wales). Accordingly, Attachment A contains the City's recommended changes to the Urban Design Guidelines.	
COS32	**Public Art Strategy** It is clear there was no public art input or expertise (e.g. from a public art curator or similar) into the submitted public art strategy. Public art is not clearly separated from heritage interpretation. The opportunities identified on page 99 of the Urban Design Guidelines (which contains the strategy) all relate to heritage or history. There should be a separate heritage interpretation strategy. While the history of the site could inform the public art, it should be considered separately. Similarly, the principles outlined are also of concern as they place a functional emphasis ("Security" and "Landmarks and Meeting Places") on public art. These functional objectives are likely to be written into artist briefs and given priority over innovation and artistic excellence. By standards, a Public Art Advisory Committee should have at least one other public art expert.	The public art strategy included at section 7.4 of Appendix C- Urban Design Guidelines has been based on the *City of Sydney Public Art Policy* and *Public Art Strategy*. The public art strategy is not intended to replace heritage interpretation, rather heritage is a key theme considered worthy to inform potential public art within the site. Page 100 of Appendix C- Urban Design Guidelines of the exhibited EIS contains a commitment by the Applicant to forming an advisory committee for public art. This committee will include a curator/ consultant '*with an expert knowledge of contemporary artists and their artwork.'*
	Site Contamination	
COS33	The demolition of the existing SFS and ancillary structures including the existing Sheridan, Roosters, Waratahs and Cricket NSW building is proposed to the existing slab level only. Underground storage tanks (USTs) are located along the eastern site boundary and are used to store petrol and diesel for maintenance vehicles and equipment. It is unclear from the information submitted if the underground storage tanks are to be retained or replaced. As a hazardous materials register has not been submitted for the existing structure, it is unclear if the building has any asbestos containing materials present. A Detailed Site Investigation must be undertaken to fully characterise the contamination status of the site.	Noted. The removal of the USTs does not form part of the Stage 1 works, and would be subject to future environmental assessment and planning approval. A Hazardous Materials Survey will be prepared prior to the commencement of works, as outlined in the final Mitigation Measure S1-CG1 contained in **Section 5.0 of the Response to Submissions**. A Detailed Site Investigation will be provided with the Stage 2 Development Application.
	Heritage Approvals	
COS34	The site is affected by a State Heritage Listing and General Terms of Approval should be obtained from the Heritage Council. There is a potential that the demolition works through vibration could impact Busby's Bore.	A methodology statement has been prepared which outlines the measures to be incorporated to ensure the protection of Busby's Bore and is included at Attachment 8 to this Response to Submissions. The requirement to obtain General Terms of Approval does not apply to State Significant Development. The Heritage Council has made a submission which is addressed in this response table.
	Lighting	
COS35	A detailed lighting proposal for the streets surrounding the stadium, pedestrian routes, public domain and sports stadium has not been provided. Sports fields lighting for stadia must comply with glare and spill light control provisions of AS4282.	Sports lighting will comply with AS4282 and be detailed as part of the Stage 2 Development Application.
	Shadow Diagrams	

No.	Extract	Response
COS36	The application acknowledges that the increased building envelope will generate additional shadow impacts over the parklands. The submitted shadow diagrams prepared by SJB lack sufficient detail to determine the extent of impacts and do not provide a comparison of the existing and proposed overshadowing. The shadow diagrams must be amended to include the appropriate level of detail required to undertake an assessment of environmental impacts including greater site context and separation of diagrams onto single pages.	Shadow diagrams have been updated to include: - cadastral lot information - differentiation between existing and proposed shadow - labelling of key features including Kippax Lake and Driver Avenue They have also been separated on to single pages and included at Attachment 4 of this Response to Submissions.
	Response to Urban Design Guidelines	
COS37	**Key Moves** • The guidelines propose that, "The redevelopment also provides an opportunity to integrate the SFS into its parkland setting and reinforce the stadium's unique location and proximity to Moore Park and Centennial Park". These guidelines are inappropriately drafted from the perspective of the stadium redevelopment and for its benefit, rather than focused on the best interests of the surrounding parklands and public domain. • The fundamental purpose of the surrounding public parkland is passive and active recreation. The proposed redevelopment of the stadia is inconsistent with that purpose and includes potential impacts due to increased built form, overshadowing, new hard surfacing and alienation of parkland for event-related activities. • The stated principle of increased permeability will have undesirable impacts if it leads to hard surfacing replacing landscaping, fragmentation of green space with paths and built form, or the degradation of parkland through event-related impacts. • The list of 14 locations in this section is unclear and omits guidance to understand what 'guidelines' are being provided for protection and improvement. • The guidelines need to be rewritten, through a process of effective public consultation, consistent with and respectful of the role and purpose of the parklands.	The Urban Design Guidelines have been prepared for the construction of the new stadium on land controlled by the SCSGT. They are intended to complement, but not override, the Moore Park Master Plan 2040 which has been prepared by the Centennial Parklands and Moore Park Trust. The stadium is not located within the parkland, but rather on land controlled by the SCSGT and designated for major sporting events. The Concept Proposal is consistent with this purpose. A key outcome of the redevelopment will be the removal of the existing fence around the stadium, enabling greater permeability through the site. Detailed shadow diagrams are provided in **Attachment 4** of the Response to Submissions and discussed at Section 4.2 of the Response to Submissions.
COS38	**Access and Movement** ***Present Access and Egress*** • The location of routes to and from the stadia depend on neighbouring land owners approving access, which must only be consistent with the objective of the surrounding sites and consistent with the public interest. • The applicant has not discussed with the City affected public domain under the City control. • A contribution or funding must be provided for identified offsite improvements, including opportunities to fix existing systemic problems caused by the stadium's location. ***Active Transport*** • Even with a refurbishment, the Stadium should provide end of trip bicycle parking for both employees and visitors, and shared with neighbouring publicly-owned sites (especially the Sydney Cricket Ground, NRL building and Rugby Australia building). • Facilities for employees, being personal lockers, showers, change rooms, and bicycle storage areas, should be consistent with section 3.11.3 of Sydney DCP 2012. ***Vehicular Access and Movement***	**Pedestrian access and egress:** - The SFS redevelopment proposes the retention of existing vehicular routes into Sydney Cricket Ground and Sports Ground Trust Land, off Moore Park Road down Paddington Lane on the west of the site, emergency vehicle/servicing access off the Moore Park Road, Oatley Road intersection and into MP1 off Driver Avenue. No new vehicular access points are proposed. - No off-site infrastructure beyond that which is currently present has been required as being necessary to support the proposed stadium. The Applicant will work with the Moore Park Working Group to ensure that the detailed design and operation of the stadium is fully integrated with surrounding land. - **Active Transport:** - The project will deliver facilities to meet the requirements of the new stadium.

No.	Extract	Response
	• The MP1 carpark is proposed to be reinstated upon completion of construction with access to the new Stadium basement via the MP1 car park. To improve the Moore Park Road interface, vehicle access/egress to the Rugby Australia car park should be consolidated directly via the MP1 carpark. This would remove the existing driveway cutting in the Rugby Australia forecourt to reintegrate space into the public domain. • To reduce additional vehicle crossovers, new access should not be provided at Oatley Road and the Moore Park Road access should be co-located with the existing adjacent access. • The guidelines should not dictate that the services only be at grade directly off Moore Park Road. Within the constraints of protecting Busby's Bore and 'Tree 125', better design options should be explored, including the below ground or fully integrated into the building. ***Circulation within the site*** • During events, provision of a ticket/security check line at Moore Park Road may not be appropriate if expected patron numbers cannot be accommodated safely and comfortably. • Access for pedestrians and vehicles should be separated.	- The Sydney DCP does not apply to this project, and does not specify rates for a stadium that would be relevant to this development. Facilities will be designed in accordance with the NSW Planning Guidelines for Walking and Cycling (2004). - **Vehicular Access and Movement** - Access to the Rugby Australia Building car park is not located on the project site and therefore does not fall within the scope of this project - Existing access off the Oatley Road/Moore Park Road intersection has been retained for emergency vehicle and servicing access to the external concourse of the stadium - Services for both the SFS and SCG are currently located along Moore Park Road to provide easy access to emergency services and service providers. Their design treatment and integration into landscape features will be subject to detailed design as part of the Stage 2 Development Application. **Circulation within the Site** - The SFS redevelopment moves the stadium form further south and west towards Driver Avenue to create more space between the stadium and Moore Park Road. This in conjunction with the continuation of public domain levels along Moore Park Road into the site and an operational overlay, will manage safety concerns during a special event security configuration. During most events, the line of security will be located adjacent to the ground floor of the stadium and will not be located adjacent to major roads - Pedestrians and vehicles have been grade separated through the extension of the public domain over Paddington Lane and access to the basement. An operational overlay subject to the Sydney Cricket Ground and Sports Ground Trust also provides the opportunity for separation of vehicles and pedestrians on event days.
COS39	**Building Height and Massing** • The building footprint, height and massing are too large for the constrained site. The guidelines need to eliminate new impacts, including overshadowing, on the parklands.	The proposed stadium is capable of being fully accommodated on land controlled by the SCSGT without resulting in any significant environmental impacts.
COS40	**Public Realm and Open Space** • Design of stairs to Driver Avenue needs to provide generous landings and gathering spaces consistent with AS1428. • At Driver Avenue, management of overland water flows need to be safely integrated into the proposed approach to building and landscape design. • The ARUP Stormwater and Flooding Assessment Report (Revision 3) indicates that overland flow down Paddington Lane will be limited by modifying the road levels, with an increase in flow around the Oatley Road entry and adjacent to the western boundary of the Stadium. The likely subsequent increase in the volume and speed of the flow needs to be addressed.	Noted, this will be subject to the Stage 2 Development Application. Noted. Refer to Stormwater and Flooding Report at Appendix P of EIS. The Arup proposals for stormwater and flood risk management involve modifying the proposed external levels around the stadium perimeter to marshal overland flows in a counter clockwise direction. These flows ultimately discharge towards Driver Avenue as per the existing condition. The altered site level will occur within the stadium site only (i.e. with no changes to Moore Park Road) and consequently there will be no net change in the volume of water or peak velocity of overland

No.	Extract	Response
		stormwater flows entering the site from Moore Park Road. This approach is described in greater detail in Section 4.3 and illustrated in Figures 8 and 9 of Appendix P of the EIS. Whilst peak flow rate and velocity of flows around the western side of the stadium are likely to be higher than the existing condition, it is practical to manage the overland flows to reduce the risks to the stadium building, vehicles and pedestrians. The proposed approach is to grade the external levels away from the stadium and towards the outer edge of the elevated concourse where overland flow can be contained by the parapet wall. Figure 2.1D and 2.1V in Appendix P of the EIS illustrate the effectiveness of this approach in creating a zone clear of flooding between the stadium and concourse extents. These figures also demonstrating that the peak flow depth will not exceed 250mm and the peak flow velocity will not exceed 1m/s in the 1 in 100 year storm. Consequently the associated hazard classification (the product of depth and velocity) of this western overland flow path is low all the way from Moore Park Road to Driver Avenue. The proposed flood risk management strategy has considered and addressed these risk items in principle in support of the planning application. Further detailed flood modelling and design coordination will be prepared as part of the detailed stadium design and will be subject to the Stage 2 Development Application
	• Any proposals must be co-ordinated with the City of Sydney separated cycleway proposal on the southern side of Moore Park Road. • To mitigate heat island effects and provide shade and comfort, landscaping should include permanent tree planting and landscaped areas, not moveable planters. The extent of the proposed basement limits deep soil areas and should be designed to allow deep soil zones for mature or large scale trees. • Tree 125 (Moreton Bay Fig) is listed in the City's Register of Significant Trees. This tree must be retained and protected long-term through required setbacks and sensitive construction methods. Advice must be sought from a qualified Arborist (minimum AQF Level 5) with City confirmation of the design being acceptable. • Some City comments throughout this appendix apply to principles restated in this section.	The detailed design of the project and public domain will be coordinated with the cycleway. The Mitigation Measure CP-BD3 outlined at Section 5.0 of the Response to Submissions commit to a 1.5:1 ratio for replacement tree planting as part of the detailed landscape design, to be subject to the future Stage 2 Development Application. The Arboricultural Impact Assessment prepared by TreeIQ and provided at Appendix F of the publicly exhibited EIS confirms that this tree will be protected and retained throughout demolition and construction. TreeIQ possesses the necessary level of qualification identified by Council and will be retained by the Applicant.

No.	Extract	Response
COS41	**Security and Safety** • Australia's Strategy for the Protection of Crowded Places from Terrorism outlines the role of landowners and operators in protecting the health and safety of people within their areas. Any proposed measures should be consistent with this strategy. • Hostile vehicle barriers, including their required footings, should be solely on Stadium land and integrated with other public domain elements to minimise clutter. Design and operations should consider the possible use of the venue as a mass evacuation centre, as per the State Emergency and Rescue Management Act.	These matters relate to detailed design issues which will be addressed in the Stage 2 Development Application.
	Wayfinding, Signage and Interpretation • A Wayfinding Signage Strategy must be submitted to the City for review, consistent with the City's Legible Sydney Wayfinding Strategy.	Guidelines for wayfinding are included within section 8.7 of Appendix C- Urban Design Guidelines of the exhibited EIS. As detailed within the guidelines, seamless integration of surrounding wayfinding typologies will be required. It is the Applicant's intention to utilise the Legible Sydney palette where possible. A wayfinding and signage strategy will be included in the Stage 2 SSDA.
	Architectural Expression • Given the site's parkland setting adjacent to heritage conservation areas, the Stadium facade must not be used as a device for third party advertising or branding. • The competitive design process should allow for a holistic and integrated design approach. Testing the assumptions of the reference design can reveal opportunities and constraints which were not previously understood.	It is noted that the existing stadium includes significant branding and advertising within the façade and LED screens. It is anticipated that this will be further considered as part of the Stage 2 SSDA. Noted.
	Sustainability • GreenStar is preferred to LEED as the nominated Rating Tool. The international marketing aspects that have driven the preference for LEED may weaken performance outcomes. • Any renovation or redevelopment must demonstrably deliver carbon (GHG) abatement, mains potable water savings and urban greening (revegetation and biodiversity opportunity enhancement), using the existing Stadium operations as the benchmark. • The site should incorporate a collection point for the NSW Government's Container Deposit Scheme, to align with NSW Government and City of Sydney priorities to reduce waste.	Refer to responses to comments COS23-25 The comment regarding container deposit scheme is noted. This will be addressed during the Stage 2 DA.

1.9 Transport for NSW

No.	Extract	Response
	Transport for NSW (TfNSW)	
	Sydney Light Rail Project	
T1	TfNSW advises that the Sydney Light Rail Project was determined by the Department of Planning and Environment on 4 June 2014. Construction is being carried out in accordance with the existing approvals and any modifications subsequently approved. The Transport Assessment Report prepared to support the proposed development includes light rail capacities for various event crowd sizes in the Moore Park Precinct. TfNSW advises that the capacities appear to be different to those stipulated in the Sydney Light Rail Project Deed.	The project deed for the CBD and South East Light Rail project (Appendix 38, minimum service requirements) noted the following in relation to the capacity of light rail services: *The CSELR infrastructure……must as a minimum be designed and constructed to have the per hour per direction passenger capacity for a combination of regular services and/or special event services for each CSELR section as follows:* • *9,000 between Circular Quay Stop and Central Station Stop* • *10,800 between Central Station Stop and Moore Park Stop for a combination of regular services and special event services* Section 4.2.6 (Table 29) of the same project deed noted however that the **minimum** capacity of regular service and special event service light rail is 7,200 passengers per hour between Central Station and Moore Park in the 90 minutes prior to the start of events. Recent advice from Transport for NSW received in August 2018 noted that a figure of 7,200 passengers per hour should be used for the purposes of understanding the minimum service requirements of the light rail. This figure has been adopted and the mode share assumptions updated to reflect this revised capacity, in response to comment T2 of Attachment 1 of the Response to Submissions
T2	**Recommendation** TfNSW advises that the applicant needs to amend the light rail capacities in the Transport Assessment Report to be in accordance with the Sydney Light Rail Project Deed. TfNSW also advises that the proposed future mode share split for spectators should be amended accordingly in the report. Further, TfNSW requests the applicant be conditioned to the following: • The applicant shall ensure that the development does not adversely impact the completion of the Sydney Light Rail Project's program of works, including, but not limited to, footpaths, kerbs and gutters and road restoration works.	The Applicant has no objection to the proposed condition.
	Hostile Vehicle Mitigation	
T3	The Security Principles Report prepared to support the proposed development identifies various areas around the proposed development which could be exposed to hostile vehicle ramming or intrusion and describes potential physical security treatment measures that need to be designed into the development's architecture to treat security risks. TfNSW advises that the proposed development should be designed to eliminate exposure to hostile vehicles, including areas of people congregation and paths between the new stadium and public transport nodes.	Noted.

<table>
<tr><th>No.</th><th>Extract</th><th>Response</th></tr>
<tr><td></td><td>Further, TfNSW advises that Hostile Vehicle Mitigation requirements have required the closure of Driver Avenue at the existing MP1 car park driveway during events, rendering redundant the use of the existing northern vehicle turning circle on Driver Avenue. As such, inadequate vehicle turning facilities are available for vehicles needing to turn around in Driver Avenue to access car parks or exit onto Moore Park Road.

TfNSW advises that these issues should be considered as part of a Security Risk Assessment for the proposed development and the Moore Park Precinct.</td><td></td></tr>
<tr><td>T4</td><td>Recommendation
TfNSW requests that the applicant be conditioned to the following:
• The applicant shall undertake a Security Risk Assessment and prepare a plan which ensures the development eliminates exposure to hostile vehicles, including areas of people congregation and paths between the new stadium and public transport nodes and provides adequate facilities to support Hostile Vehicle Mitigation requirements in the Moore Park Precinct. The plan shall be prepared in accordance with Australia's Strategy for Protecting Crowded Places from Terrorism and Hostile Vehicle Guidelines for Crowded Places. The plan shall 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, Sydney Cricket and Sports Ground Trust and ·centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.</td><td>The Applicant has agreed the following change to the condition with TfNSW:
The applicant shall undertake a Security Risk Assessment and prepare a plan which ensures the development minimises and manages exposure to hostile vehicles, including areas of people congregation and paths between the new stadium and public transport nodes and provides adequate facilities to support Hostile Vehicle Mitigation requirements in the Moore Park Precinct. The plan shall be prepared in accordance with Australia's Strategy for Protecting Crowded Places from Terrorism and Hostile Vehicle Guidelines for Crowded Places. The plan shall 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, Sydney Cricket and Sports Ground Trust and ·centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.</td></tr>
<tr><td></td><td>Traffic and Transport Surveys</td><td></td></tr>
<tr><td>T5</td><td>The Transport Assessment Report states that transport surveys were undertaken to understand how people travel to the existing Sydney Football Stadium and includes the results of the surveys.

TfNSW advises that the surveyed events were not significant in crowd number and therefore not indicative of the traffic and transport issues for the stadium. Further, the traffic and transport volumes were skewed due to the closure of Moore Park Road during one of the events and rain during the other.</td><td>Following consultation with TfNSW, travel surveys were undertaken at two events in the Moore Park precinct. The events chosen represented larger events than those originally surveyed, and included a ‘double header’ event where nearly 50,000 people were in the precinct. Details of the additional surveys are summarised in the table below.

<table>
<tr><th>Match</th><th>Code</th><th>Date</th><th>Start time</th><th>Crowd</th></tr>
<tr><td>Roosters vs Dragons</td><td>NRL</td><td>Sunday 29 July</td><td>4.00pm</td><td>19,800</td></tr>
<tr><td>Swans & Roosters Double Header</td><td>NRL & AFL</td><td>Saturday 4 August</td><td>7.30pm</td><td>48,000 (combined)</td></tr>
</table>

The results of the updated survey generally validate the mode share forecasts originally provided in the Transport Impact Assessment (TIA) provided at Appendix J of the exhibited EIS. In particular, the proportion of people driving to the Sydney Swans vs Collingwood match (crowd ~40,000) was less than 35%, similar to the forecast provided in the TIA. Minor changes have been made to the mode share forecasts to reflect the results of the recent travel survey (refer to Attachment 5 of the Response to Submissions).
As noted in the TIA, the mode share for an event will be dependent on a variety of factors including:</td></tr>
</table>

<table>
<tr><th>No.</th><th>Extract</th><th>Response</th></tr>
<tr><td></td><td>TfNSW also advises that the number of travel behaviour survey responses as a percentage of total event attendance, appear to be inconsistent with announced event crowd numbers.</td><td>- Size (i.e. number of people in attendance)
- Start time
- Day of week
- Sporting code
- Competing teams

Further clarity around the number of responses received and how this relates to the number of people that attended the event are provided in the table below. It should be noted that the number of responses noted in the TIA reflected the number of groups interviewed for the survey. The '% of total attendance' numbers listed in the TIA takes into account the number of people present within each group.

<table>
<tr><th>Match</th><th>Date</th><th>Crowd</th><th>Number of individual groups surveyed</th><th>Number of responses (takes into account size of group)</th><th>% of crowd size</th></tr>
<tr><td>Waratahs vs Stormers</td><td>Saturday 25 February</td><td>11,000</td><td>877</td><td>2,367</td><td>21.5%</td></tr>
<tr><td>Roosters vs Knights</td><td>Friday 16 March</td><td>10,000</td><td>619</td><td>1,465</td><td>14.7%</td></tr>
<tr><td>Sydney FC vs Adelaide United</td><td>Saturday 17 March</td><td>9,000</td><td>915</td><td>2,338</td><td>26.0%</td></tr>
<tr><td>Roosters vs Dragons</td><td>Sunday 29 July</td><td>19,800</td><td>1128</td><td>2,918</td><td>14.7%</td></tr>
<tr><td>Swans vs Collingwood</td><td>Saturday 4 August</td><td>39,800</td><td>724</td><td>1,857</td><td>4.7%</td></tr>
<tr><td>Roosters vs Cowboys</td><td>Saturday 4 August</td><td>9,800</td><td>449</td><td>1,241</td><td>12.7%</td></tr>
</table>
</td></tr>
<tr><td>T6</td><td>Recommendation
TfNSW requests that the applicant undertake new surveys of major events at the existing Sydney Football Stadium and amend the proposed future mode share split for spectators in the Transport Assessment Report based on the results of the new surveys. TfNSW advises that the applicant shall ensure that the events chosen to be surveyed are forecast to have significant crowd numbers and that no coinciding road closures are planned to be undertaken.</td><td>The outcomes of these surveys are detailed above. Confirmation that the surveys were appropriate was obtained by TfNSW on 18 July 2018.</td></tr>
<tr><td></td><td>Point to Point Transport Passenger Pick-up/Drop-off</td><td></td></tr>
<tr><td>T7</td><td>The Transport Assessment Report states that point to point transport is one of the modes used to travel to the Sydney Football Stadium, including rideshare services and taxis. It also states that private vehicle passenger pick-up/drop-off currently occurs within and surrounding the precinct using a combination of dedicated pick-up/drop-off facilities and temporary setups which are monitored and managed by event staff. Informal passenger</td><td>Noted.</td></tr>
</table>

No.	Extract	Response
	pick-up also occurs on-street. The report recommends several measures to accommodate the demand from the proposed development. TfNSW advises that it has concerns with the recommended measures to accommodate the demand from the proposed development and requests that the applicant work with the relevant stakeholders to provide adequate dedicated passenger pick-up/drop-off facilities to support the operation of point to point transport for the proposed development and the Moore Park Precinct.	
T8	**Recommendation** TfNSW requests the applicant be conditioned to the following: • The applicant shall prepare a plan which ensures adequate dedicated passenger pick-up/drop-off facilities for point to point transport services are provided for the development and the Moore Park Precinct. The plan shall 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, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.	The Applicant has agreed the following change to the condition with TfNSW: *The applicant shall prepare a plan which ensures adequate dedicated passenger pick- up/drop-off facilities for point to point transport services are provided for the development and **in consideration of the Moore Park precinct**. The plan shall 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, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.*
	Coach Passenger Pick-up/Drop-off and Layover	
T9	The Transport Assessment Report states that coaches currently use Moore Park Road and the southern end of Driver Avenue on event days to drop off and pick up passengers. It also states that there may be the opportunity for coaches to use the existing special event bus loop with the expected reduction in special event buses due to the introduction of light rail services to the precinct. TfNSW advises that there is no dedicated facility for coach passenger pick-up/drop-off and layover to support the proposed development and the Moore Park Precinct. Further, TfNSW requests that the applicant detail the assumptions for its expected reduction in special event buses to support the Moore Park Precinct, in the Transport Assessment Report. TfNSW requests that the applicant work with the relevant stakeholders to provide adequate dedicated coach passenger pick-up/drop-off and layover facilities for the proposed development and the Moore Park Precinct.	Noted.
T10	**Recommendation** TfNSW requests the applicant be conditioned to the following: • The applicant shall prepare a plan which ensures adequate dedicated coach passenger pick-up/drop-off and layover facilities are provided for the development and the Moore Park Precinct. The plan shall 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, Sydney Cricket and Sports Ground Trust and	The Applicant has agreed the following change to the condition with TfNSW: *The applicant shall prepare a plan which ensures adequate dedicated coach passenger pick-up/drop-off and layover facilities are provided for the development **and in consideration of the Moore Park Precinct**. The plan shall 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, Sydney Cricket and Sports Ground Trust and Centennial Park and*

No.	Extract	Response
	Centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.	*Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.*
	Public and Active Transport Infrastructure	
T11	The Environmental Impact Statement (EIS) prepared to support the proposed development states that the public domain strategy for the proposed development significantly increases accessibility to the stadium site by removing existing fences to Moore Park Road and formalising Moore Park Road and Driver Avenue as the primary entrances for pedestrians accessing the stadium. It also states that general public access would be provided through to the Moore Park Precinct via the Moore Park Road entrance, on non-event days. Further, the Transport Assessment Report states that the Driver Avenue entrance would support access to the redeveloped stadium from Central Station, via Devonshire Street and the Albert Tibby Cotter Bridge. TfNSW advises that it supports the applicant's proposal to improve pedestrian access to the redeveloped stadium and through the Moore Park Precinct, which would also provide the general public with access to light rail services at the Moore Park Stop and bus services on Anzac Parade. TfNSW however advises that the proposed development would result in an increase in demand on existing pedestrian facilities which may be inadequate in terms of their capacity and condition, including pedestrian holding areas at intersections, such as between bus stops on Oxford Street and the proposed formalised stadium entrance on Moore Park Road, via Regent Street and Oatley Road. Further, TfNSW advises that the proposed development would strengthen existing pedestrian desire lines which may not be currently supported by adequate pedestrian facilities, such as between the proposed formalised stadium entrance on Driver Avenue and the Albert Tibby Cotter Bridge. TfNSW advises that this pedestrian desire line is inadequately supported by a narrow and indirect walkway and is considered in the Transport Assessment Report to become attractive to more people accessing the proposed development site due to improved legibility from the introduction of the Sydney Light Rail on Devonshire Street and the new grade separated crossing of South Dowling Street. TfNSW advises that a detailed pedestrian route assessment of key routes between public transport nodes and the proposed development site, including the planned Moore Park light rail stop, should be undertaken to identify any works needed to improve the capacity, condition and directness of pedestrian facilities to adequately support the proposed development and the Moore Park Precinct, and requests that the applicant work with the relevant stakeholders to prepare a plan to achieve this.	Noted.

No.	Extract	Response
	TfNSW also advises that the planned separated cycleway on Moore Park Road, adjacent to the proposed development site, should be incorporated appropriately into the redeveloped stadium's infrastructure and operation plans. The Transport Assessment Report also states that the proposed development includes secure bicycle parking and end of trip facilities for staff in the Sydney Football Stadium and the Moore Park Precinct as well as more bicycle parking for visitors, to encourage a travel behavior change for the precinct. TfNSW advises that the applicant should ensure bicycle facilities are located in secure, convenient and accessible areas close to the proposed formalised entrances of the redeveloped stadium, incorporate adequate lighting and passive surveillance and designed in accordance with Austroads guidelines.	
T12	**Recommendation** TfNSW requests that the applicant be conditioned to the following: • The applicant shall undertake a detailed pedestrian route assessment of key routes between public transport nodes and the development site and prepare a plan which ensures that the capacity, condition and directness of pedestrian facilities adequately supports the development and the Moore Park Precinct. The plan shall be undertaken in consultation with the Sydney Coordination Office and Transport Management Centre within TfNSW, Roads and Maritime Services, NSW Police, City of Sydney Council, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment. • The applicant shall ensure that the planned Moore Park Road separated cycleway is incorporated appropriately into the redeveloped stadium's infrastructure and operation plans in the Stage 2 State Significant Development for the Sydney Football Stadium redevelopment. • The applicant shall ensure bicycle facilities are located in secure, convenient and accessible areas close to the proposed formalised entrances of the redeveloped stadium, incorporate adequate lighting and passive surveillance and designed in accordance with Austroads guidelines, in the Stage 2 State Significant Development for the Sydney Football Stadium redevelopment.	The Applicant has agreed the following change to the condition with TfNSW: • *The applicant shall undertake a detailed pedestrian route assessment of key routes between public transport nodes and the development site and prepare a plan which ensures that the capacity, condition and directness of pedestrian facilities adequately supports the development* ***and in consideration of the Moore Park Precinct****. The plan shall be undertaken in consultation with the Sydney Coordination Office and Transport Management Centre within TfNSW, Roads and Maritime Services, NSW Police, City of Sydney Council, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.* • *The applicant shall ensure that the planned Moore Park Road separated cycleway is incorporated appropriately into the redeveloped stadium's infrastructure and operation plans in the Stage 2 State Significant Development for the Sydney Football Stadium redevelopment.* • *The applicant shall ensure bicycle facilities are located in secure, convenient and accessible areas close to the proposed formalised entrances of the redeveloped stadium, incorporate adequate lighting and passive surveillance and designed in accordance with Austroads guidelines, in the Stage 2 State Significant Development for the Sydney Football Stadium redevelopment.*
	Wayfinding and Signage	
T13	The Urban Design Guidelines prepared to support the proposed development state the following: • The site is surrounded by a series of different stakeholders and land owners with varying signage style guides which create difficulties in supporting simple and legible access to the stadium; and • Opportunities will be sought to provide some consistency in wayfinding and signage to assist patrons in accessing the site and surrounding Moore Park Precinct.	Noted.

No.	Extract	Response
	TfNSW advises that the Moore Park Precinct, including the proposed development site, could be accessed from several public transport nodes including from rail services at Central Station and bus services on Anzac Parade, Oxford Street and Lang Road. Special event buses are also available from the special event bus loop. Light rail services will also be available at the Moore Park Stop. The Transport Assessment Report states that the proposed formalised Driver Avenue entrance would support access to the redeveloped stadium from Central Station, via Devonshire Street and Albert Tibby Cotter Bridge and requires improvements to wayfinding and lighting. The report also states that the applicant proposes to work with relevant stakeholders to improve wayfinding to public transport nodes and other key land uses. TfNSW advises that there is a strong need to improve wayfinding and signage between the various public transport nodes and from within the Moore Park Precinct, including lighting, to assist patrons in accessing events within the precinct. TfNSW advises that it supports the applicant's proposal to improve wayfinding and signage and requests that the applicant work with the relevant stakeholders to implement adequate wayfinding and signage between public transport nodes and from within the Moore Park Precinct, including lighting.	
T14	**Recommendation** TfNSW requests that the applicant be conditioned to the following: • The applicant shall prepare a Wayfinding and Signage Strategy to improve wayfinding and signage between public transport nodes and from within the Moore Park Precinct, including lighting. The strategy shall 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, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The strategy shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.	A Preliminary Wayfinding and Signage Strategy will be prepared and submitted with the Stage 2 Development Application (refer Mitigation Measure CP-TA2 at Section 5.0 of the Response to Submissions Report). This would be subject to ongoing refinement with relevant stakeholders for implementation prior to the commencement of stadium operations.
	Event Traffic and Transport Management	
T15	The Transport Assessment Report states the following regarding future events at the redeveloped Sydney Football Stadium: • It is anticipated that an average of 49-52 events per year will be undertaken, including concerts and major international events such as the Commonwealth Games and FIFA; • Attendance is anticipated to increase by up to 15 percent; • The stadium will also offer the opportunity to support new sporting products supported via professionalisation of the women's game in football, rugby and rugby league and the introduction of AFL X; and	Noted

No.	Extract	Response
	• The proposal involves a small increase in the number of event day staff to support the improved food and beverage offer and corporate facilities. The proposed development includes the formalisation of Moore Park Road and Driver Avenue as the primary entrances for pedestrians accessing the stadium. It also includes a basement ring road under the redeveloped stadium which will provide for loading within the stadium envelope as well as restricted parking space. The proposed development also involves changes to emergency vehicle access arrangements. TfNSW advises that the operation of traffic and transport within the Moore Park Precinct during events is managed under the Moore Park Precinct Traffic and Transport Management Plan. TfNSW advises that the proposed increase in events and attendance at the redeveloped stadium would affect the existing protocols for managing event traffic and transport in the precinct. The proposed public domain changes such as the formalisation of primary entrances to the stadium would also affect these protocols, for example, the removal of existing fences to Moore Park Road, which would affect crowd management protocols. TfNSW also advises that the Sydney Light Rail Project (including the associated pedestrian improvements between Central Station and the Moore Park Precinct), the planned separated cycleway on Moore Park Road and the implementation of dedicated passenger pick-up/drop-off facilities for point to point transport services and coach passenger pick-up/drop-off and layover facilities, would further affect these protocols. In light of the various changes in the precinct, TfNSW advises that the existing Moore Park Precinct Traffic and Transport Management Plan needs to be amended to incorporate the proposed development, including its infrastructure and operation, and planned traffic and transport infrastructure improvements in the precinct. TfNSW requests that the applicant work with the relevant stakeholders to review and amend the Moore Park Precinct Traffic and Transport Management Plan accordingly.	
T16	**Recommendation** TfNSW requests that the applicant be conditioned to the following: • The applicant shall prepare a draft amendment to the Moore Park Precinct Traffic and Transport Management Plan, incorporating the proposed development, including its infrastructure and operation, and the planned traffic and transport infrastructure improvements in the Moore Park Precinct, to ensure event traffic and transport is safely and efficiently managed. The draft amendment shall be undertaken in consultation with the Sydney Coordination Office and Transport Management Centre within TfNSW, Roads and Maritime Services, NSW Police, City of Sydney Council, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The draft amendment	The Applicant has no objection to the proposed condition.

No.	Extract	Response
	shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.	
	Travel Demand Strategy and Green Travel Plan	
T17	The Transport Assessment Report states that driving is the dominant mode of travel to the existing stadium. Further, the report notes that only some events include integrated ticketing as part of their admission. The EIS identifies that a Green Travel Plan and Transport Access Guide would be prepared for the development to encourage the use of non-car transport options by the proposed development's staff and visitors. The EIS also states that a key outcome of the proposed development is to improve the use of sustainable modes of transport by investigating initiatives such as integrated ticketing between events and transport providers. TfNSW advises that it supports the applicant's proposal to encourage the use of non-car transport options and requests that the applicant work with the relevant stakeholders to implement a Travel Demand Management Strategy and Green Travel Plan for the proposed development and the Moore Park Precinct.	Noted
T18	**Recommendation** TfNSW requests the applicant be conditioned to the following: • The applicant shall prepare a draft Travel Demand Management Strategy and Green Travel Plan to increase the mode share of public transport and active transport for the development and the Moore Park Precinct. The draft strategy and plan shall 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, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The draft strategy and plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.	The Applicant has agreed the following change to the condition with TfNSW: *The applicant shall prepare a draft Travel Demand Management Strategy and Green Travel Plan to increase the mode share of public transport and active transport for the development* ***and in consideration of the Moore Park Precinct****. The draft strategy and plan shall 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, Sydney Cricket and Sports Ground Trust and Centennial Park and Moore Park Trust. The draft strategy and plan shall form part of the submission of the Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.*
	Travel Demand Strategy and Green Travel Plan	
T19	Several construction projects, including the Sydney Light Rail Project are likely to occur at the same time as this development within the Moore Park Precinct. The cumulative increase in construction vehicle movements from these projects could have the potential to impact on general traffic and bus operations within the precinct, as well as the safety of pedestrians and cyclists, particularly during commuter peak periods and events.	Noted
T20	**Recommendation** TfNSW requests that the applicant be conditioned to the following: • The applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office, Transport Management Centre and Sydney Light Rail team within TfNSW and Roads and Maritime Services. The	The Applicant has no objection to the proposed condition.

No.	Extract	Response
	applicant shall submit a copy of the final plan to the Coordinator General, Transport Coordination within TfNSW for endorsement, prior to the commencement of any work on site. The CPTMP needs to specify, but not be limited to, the following: – Location of the proposed work zone; – Size and type of vehicle, including swept path analysis; – Details of any road closures; – Haulage routes including marshalling area/s and operation; – Proposed location of the crane; – Construction vehicle access arrangements; – Proposed construction hours; – Estimated number of construction vehicle movements, including measures to reduce the number of movements during peak traffic periods; – Construction program; – Consultation strategy for liaison with surrounding stakeholders; – Any potential impacts to general traffic, cyclists, pedestrians and light rail and bus services, including special event buses, within the vicinity of the site from construction vehicles during the construction of the proposed works; – Cumulative construction impacts of projects including the Sydney Light Rail Project. 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 road network; – Measures to avoid construction worker vehicle movements within the vicinity of the precinct, including any off-site construction worker parking location/s away from the precinct and operation; and – 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 • Construction works shall not be undertaken for at least two hours prior to an event, during an event and two hours post an event, to minimise the risk of pedestrian and construction vehicle conflicts, without prior approval of the Sydney Coordination Office and Transport Management Centre within TfNSW and Roads and Maritime Services. • The applicant shall provide the builder's direct contact number to the Sydney Coordination Office and Transport Management Centre within TfNSW to resolve issues relating to traffic, freight, servicing and pedestrian access during construction, in real time. The applicant is responsible for ensuring the builder's direct contact number is current during any stage of construction. • The applicant shall prepare a draft Construction Pedestrian and Traffic Management Plan in consultation with the Sydney Coordination Office, Transport Management Centre and Sydney Light Rail team within TfNSW and Roads and Maritime Services, for the construction of the new stadium. The draft plan shall form part of the submission of the	

No.	Extract	Response
	Stage 2 State Significant Development application for the Sydney Football Stadium redevelopment.	
T21	TfNSW requests that the applicant consults with the Sydney Coordination Office within TfNSW in relation to the above issues. TfNSW would be pleased to consider any further material forwarded from the applicant.	The Applicant met with TfNSW and the Sydney Coordination office on 14 August 2018 and agreed the above responses.

1.10 NSW Government Architect's Office

No.	Extract	Response
	NSW Government Architect's Office	
	Design Excellence	
GA1	In general, we support the proposed Design Excellence Strategy, however we note that achieving design excellence for this project will rely on the skill and innovation capabilities of the design team in responding to the design guidelines and the opportunities of the site. We encourage the proponent to consider approaching emerging or new design practices with a reputation for innovation in design and delivery.	Noted.
	Urban Design Guidelines	
GA2	In general we support the proposed guidelines and encourage that they could be more ambitious to support the delivery of a benchmark project, commensurate with the prominence and significance of this site in the wider context of the city.	The Applicant considers that the Urban Design Guidelines included at Appendix C of the exhibited EIS provide an appropriate level of analysis of the surrounding context, strategic planning documents and developments that has informed the Guidelines and concept design.
GA3	**Project Vision and Principles**: Generally, we would support the Project Vision and Principles as described in the document. The guiding aims of The Stadium in the Park, Well Connected and Integrated and New Spaces for the Public will be crucial to the way this public infrastructure contributes to the city. The design principles could be developed to be more specific in order to provide a better framework for the future development. Some Design Principles are discussed individually below.	Noted. The Design Principles are considered to strike an appropriate balance between setting the strategic design direction for the project whilst allowing scope for innovation in design and delivery through the competitive design process and detailed design, which will be subject to the future detailed Stage 2 Development Application.
GA4	**Movement and Circulation**: The aim to open the spaces around the stadium to the public on non-event days is supported. Further detail on the expectations with regards to level of access, use and program and safety should be developed. The aim to improve the pedestrian access from Moore Park Rd and to significantly improve public domain in that area is commended.	Such further detail will be included within the Stage 2 Development Application. Noted.
GA5	**Character and Atmosphere**: This principle states that there should be 'increased stadium visibility '. This will need further development to understand how this will be achieved as this is already a largely built element in a relatively low scale urban environment. The document also discusses sensitivities around overshadowing and built context, and should incorporate the impact on the city in terms of light spill and night sky pollution, noise and reflectivity.	The proposed building envelope is defined in the Urban Design Guidelines contained at Appendix C of the exhibited EIS. A Noise and Vibration Assessment was included in the publicly exhibited EIS. Lighting and reflectivity are detailed design issues that will be resolved through the future Stage 2 Development Application.
GA6	**Amenity**: We support that the primary driver of this project is to increase the amenity for the event-day user. We also support the aim to increase amenity for the general public on non-event days. Good public domain design is essential to achieve both outcomes.	Noted.
GA7	**Heritage**:	Noted.

No.	Extract	Response
	The heritage of this site, and the opportunities here are significant. Heritage aspects should be integrated into the proposal. There is a much wider potential for the understanding of place, gathering, wayfinding, spatial arrangements and identify that can be drawn from indigenous or post-contact history. A thorough and authentic approach is encouraged.	
GA8	**Landscape and Open Space**: This project will provide the opportunity for resolving many existing issues around landscape and open space in the area. Although the site boundaries do not include Moore Park there are further opportunities to support the better use of this open space and to provide more formal pathways and circulation, as will be required. The aim to open the area surrounding the stadium to the public on non-event days suggests that the landscape could be integrated with that of Moore Park as a way of signalling that continuity.	The Applicant has established a working group with CPMPT to ensure integration of design with Moore Park. This is included in the Mitigation Measure CP-TA6 in Section 5.0 of the Response to Submissions Report Noted.
GA9	**Sustainability**: The potential exists for delivering this project as a benchmark for sustainability. The sustainability principle is considered to be setting the bar lower it could be for a public project of this nature. The aims should be for a self-sustaining stadium, proposing new ideas of waste management and encouraging construction and maintenances that are utilising the best known sustainable technologies. The ESD Report goes further in describing an appropriate approach, but this is not reflected in the Principle.	Refer to the ESD Strategy at Appendix N of the exhibited EIS, which must be read together with the Urban Design Guidelines and other supporting information.

1.11 Fire and Rescue NSW

No.	Extract	Response
	Fire and Rescue NSW	
FR1	FRNSW has no objection to the proposal regarding the demolition and reconstruction of the SFS. FRNSW is in consultation with Infrastructure NSW regarding the new stadium and understands that this consultation will continue as plans are developed. In relation to the demolition and construction phase of the development FRNSW notes that the driveway on the eastern side of the SFS has booster facilities for the fire services, fire hydrant and sprinkler systems, that service the SCG. The driveway also provides access for fire-fighters to the SCG in the instance of a fire or other emergency at the SCG. Access is to be maintained during demolition and construction of the SFS to these booster facilities and to the SCG via this driveway. If access is to be restricted or blocked to these booster facilities or to the SCG via this driveway, for any period of time during the demolition and construction of the SFS, it requested that FRNSW be advised in writing two (2) days prior to the access being restricted, so that operational plans can be put in place whilst access is restricted.	Noted. Fire + Rescue NSW's access and notice requirements have been included at Mitigation Measure S1-CM1 in Section 5 of the Response to Submissions Report.

1.12 NSW Police

No.	Extract	Response
	NSW Police	
P1	NSW Police would expect: • Notification of any road closures during demolition and construction work. • Adequate lighting of the work site at night. • The work site to secured at night or during periods of inactivity. • Security patrols of the work site by contracted licensed security guards. • All engineers, workers, visitors, security guards, etc be vetted and to follow instructions and warnings as stipulated in a formal induction process. • Police be offered a familiarisation tour of the work site. • Notification of any suspicious activity or objects in or around the work site during demolition and construction work. • A list of key contacts on the work site.	These matters are included in the Mitigation Measure S1-CM5 and S1-CM6 included at **Section 5.0** of the Response to Submissions.

1.13 Edge Environmental

No.	Extract	Response
	Edge Environmental	
EE1	We began our review of the documentation according to the SEARs in relation to sustainability themes. However, we found that this was not helpful in terms of a method for review.	Noted.
EE2	We then reviewed two key documents which covered sustainability in an overarching way. These were the urban landscape report (appendix C) and the ESD strategy (appendix N).	Noted.
EE3	It was determined that the traditional type reports (i.e. noise and vibration, flora and fauna) go through a typical structure as per the SEARs where the proponent must typically do the following: • Define the baseline • Describe the potential impact • Provide mitigation options for the impact We found this to be a robust approach.	Noted.
EE4	The ESD and climate change risk SEARs do not follow this same structure as clearly and therefore the responses in the EIS for both Appendix C and N are high level and not constructive. Using the climate change and Life Cycle Assessment as an example, the report highlights high level themes that could be applicable to any project rather than identifying material impacts and opportunities for management and holistic improvement. We would expect to see life cycle impact informed design here.	These comments are noted. The SEARs were issued by Department of Planning and Environment and the EIS addresses these requirements.
EE5	This aligns to the workshop we held on materiality and life cycle impact informed decision-making. All the ingredients to do this are in both the SEARs and the EIS response, but it falls slightly short of the mark. With some effort, the process can be updated to drive more sustainable outcomes, particularly through more robust requirements in the SEARs to provide inclusion of life cycle impact informed design.	The Applicant was not part of a workshop and is unaware of its outcomes. The SEARs were developed by Department of Planning and Environment and have been responded to within the Appendix N- ESD Strategy and Statement of the publicly exhibited EIS. The project is committed to undertaking Life Cycle Assessment during the design stage.
EE6	Lastly, is there still opportunity to push for the project to include a solution to the transport congestion that occurs at the end of major sporting events, for example: • Accurate forecasting of numbers at highly attended events • Improved accessibility for additional buses to cater for high volume in short periods • Creating multi-use precinct to offer additional post-match entertainment options thereby spreading the leaving times for patrons • Designated drive-through areas for uber/equivalent offering car-pool rides only	Refer to Appendix J- Transport Impact Assessment which was included with the publicly exhibited EIS. The transport strategies outlined in that report will be further developed through detailed design and incorporated in the future Stage 2 Development Application.