



# RESPONSE TO SUBMISSIONS AND PREFERRED PROJECT REPORT

**SSD- 9726 SYDNEY SWANS  
NOVEMBER 2019**

**URBIS**

**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

Director	David Hoy
Associate Director	Nik Wheeler
Assistant Planner	Eliza Scobie
Project Code	P6453
Report Number	Final

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# 1. INTRODUCTION

## 1.1. OVERVIEW

This Response to Submissions (**RtS**) and Preferred Project Report (**PPR**) has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of Sydney Swans (**the Proponent**) in response to public submissions relating to a State Significant Development Application 9726 (**SSDA**) for the adaptive reuse of the Royal Hall of Industries (**RHI**), located at 1 Driver Avenue, Moore Park (**the site**).

The SSDA was formally lodged with the Department of Planning and Environment (now Department of Planning, Industry and Environment (**DPIE**)) on 25 June 2019. The SSDA was placed on public exhibition for 30 days between 7 July and 7 August 2019.

This RtS and PPR has been prepared with reference to clause 85A of Division 6 of *the Environmental Planning and Assessment Regulations 2000* (**EP&A Regulations**) which states as follows:

- (1) The Planning Secretary is to provide to an applicant for State significant development the submissions, or a summary of the submissions, received in relation to the application during the submission period.*
- (2) The Planning Secretary may, by notice in writing, require the applicant to provide a written response to such issues raised in those submissions as the Planning Secretary considers necessary.*

In response to the above, this RtS and PPR identifies, discusses and addresses the submissions received by the DPIE from the exhibition of the SSDA, setting out the final proposal to be assessed by the DPIE for determination by the Minister for Planning and Public Spaces or their delegate. The report encompasses the following:

- Identification and summary of the submissions received in relation to the exhibition of the proposal, and how these matters have been resolved in the final project;
- An outline of the amendments to the application in response to issues raised or arising from design development;
- Final mitigation measures incorporated into the project.

## 1.2. THE EXHIBITED PROPOSAL

The proposed development involves the construction of a multi-purpose sport and community facility that will become the home of two of Greater Sydney's primary sporting teams, the Sydney Swans and the NSW Swifts.

The vision for the site is to create a vibrant new sporting and community precinct that will contribute to the broader entertainment and recreational identity of the Moore Park Showgrounds. The proposal will combine high-performance sporting facilities with community facilities, significantly increasing the public activation and use of the RHI and surrounding precinct. In line with this, the Sydney Swans have committed to conserving, interpreting and celebrating the rich architectural, heritage and social significance of the RHI building, and the role of this building in the cultural development of Sydney. In summary:

- The proposal seeks to adaptively reuse and reinterpret a significant heritage building, the RHI, whilst maintaining the heritage significance and architectural integrity of the building. The insertion of a structural mezzanine into the RHI will increase the amount of floor space to 8,498sqm, allowing the development of a mix of uses including high performance programmes, administration, rehabilitation and medical uses to meet the requirements of the Swans and the broader community.
- The proposal involves the development of a two-storey high-performance sports building (**Swifts building**) with a GFA of 2,090sqm in the existing southern courtyard. The Swifts building will be occupied by the NSW Swifts and will accommodate various high-performance training, rehabilitation, administration and community spaces.
- The development seeks to improve existing entries and enhancing the primary entry to the northern elevation, adjacent to the public forecourt to increase permeability in the site.

### 1.3. SUMMARY OF CONSULTATION PROCESS

The project was the subject of public exhibition undertaken by the DPIE in accordance with Division 6 of the EP&A Regulations. Exhibition commenced on 7<sup>th</sup> July 2019 and closed on the 7<sup>th</sup> August 2019. The Environmental Impact Statement (**EIS**) and supporting consultant documentation was made publicly available online at the DPIE's Major Projects website, where copies of all plans and technical reports could be and remain able to be viewed and downloaded.

Following the conclusion of the extended exhibition period, the DPIE issued correspondence dated 16 August 2019 requesting that the proponent respond to the issues raised in the submissions received during the public exhibition period.

A total of 22 submissions were received during and after the exhibition period. 13 were received from State government agencies, City of Sydney Council, utility providers and stakeholders during and after the exhibition period. Nine submissions from members of the community were received during the exhibition period.

The Project team have continued to engage with stakeholders to seek to resolve any matters as they arose; this has included: DPIE; City of Sydney Council (**CoS**); Environment, Energy and Science (**EES**); Transport for NSW (**TfNSW**), Centennial Park and Moore Park Trust (**CPMPT**), Sydney Water, NSW Heritage Council, Mardi Gras and Government Architect NSW (**GANSW**).

### 1.4. PURPOSE AND STRUCTURE OF THIS REPORT

This RtS and PPR has been prepared in accordance with clause 85A of the EP&A Regulations. This report documents and considers issues raised in the submissions made to the DPIE during the public exhibition of the EIS and is structured as follows:

- Section 1 – Introduction.
- Section 2 – Details of further consultation undertaken with the community and public agencies since the lodgement of the SSDA.
- Section 3 – Provides an overview of the public submission raised by relevant agencies and members of the public.
- Section 4 – Amendments to the application: Details the changes made to the proposal in response to the submissions received and design development.
- Section 5 – Provides justification and additional information for the Preferred Project.
- Section 6 – Final mitigation measures: Outlines the final mitigation measures incorporated into the proposal to address the potential environmental impacts.
- Section 7 – Conclusion.

### 1.5. SUPPORTING DOCUMENTATION

Technical Reports and Plans have been prepared to support the amended applications. The documentation prepared is outlined in Table 1.

Table 1 – Supporting Documentation

Document Title	Consultant	Appendix
Revised Architectural Plans	Populous	Appendix A
Addendum Design Report	Populous	Appendix B
Revised Public Domain and Landscape Plans	Arcadia	Appendix C
Revised Heritage Impact Statement	Urbis Heritage	Appendix D



<b>Document Title</b>	<b>Consultant</b>	<b>Appendix</b>
Conservation Management Plan	GANSW	<b>Appendix E</b>
Window Glazing Investigation Report	HBS	<b>Appendix F</b>
Addendum Arboricultural Impact Assessment	Allied Tree Consultancy	<b>Appendix G</b>
Precinct Public Domain Plan	Arcadia	<b>Appendix H</b>
Lighting Strategy	Aurecon	<b>Appendix I</b>
Traffic and Transport Addendum	GTA	<b>Appendix J</b>
Revised Waste Management Plan	Dickens Solutions	<b>Appendix K</b>
Revised ESD Statement	Aurecon	<b>Appendix L</b>
NCC Consultant Advice	McKenzies	<b>Appendix M</b>
Revised Environmental Construction Management Plan	Douglas Partners	<b>Appendix N</b>
Draft Construction Management Plan	FDC	<b>Appendix O</b>
Draft Event and Operational Management Plan	Sydney Swans	<b>Appendix P</b>
Microbat Survey Report	Ecological	<b>Appendix Q</b>
Flood Management Strategy	TTW	<b>Appendix R</b>
Community Brochure	Sydney Swans	<b>Appendix S</b>
Community Letter	Sydney Swans	<b>Appendix T</b>
Mardi Gras Media Release	Mardi Gras	<b>Appendix U</b>
MUSIC Stormwater Quality Model	TTW	<b>Appendix V</b>

The revised supporting documentation will enable the Department to complete its assessment of the proposal. This report should be read in conjunction with the EIS prepared by Urbis and dated June 2019, as relevant.

## 2. FURTHER CONSULTATION

The Department placed the SSDA on public exhibition between 7 July 2019 and 7 August 2019, with an additional two submissions received following this period. During this time and in the following two months, the proponent undertook further consolidation with the community and key agencies. These additional consultation activities include:

- Contact with key agencies to offer to meet, discuss the project and provide feedback. Details of consultation activities undertaken with key agencies is outlined in Table 2.
- Media release prepared and distributed by the Sydney Mardi Gras organisation providing additional information and clarification of upcoming event management for the 2020 Mardi Gras festival.
- Display of information on the Sydney Swans website at <https://sydneyswansfoundation.org.au/projects/sydney-swans-hq-community-centre/> to inform the community about the project, key attributes and delivery details. It is the intent to continue updating this website post-determination throughout the construction process, with additional proactive feedback channels to be directed to the appropriate contact.
- Updating the project website at <https://www.playongroup.com.au/> regularly to provide information about the public exhibition, key documents, how to make a submission and clarity on the project details. It is the intent to continue updating this website post-determination throughout the construction process, with additional proactive feedback channels to be directed to the appropriate contact.

Table 2 – Further consultation undertaken by the project team

Agency	Date	Summary of Consultation
Department of Planning, Industry and Environment	12 September 2019	<p>A meeting was held with the DPIE to discuss key matters relevant to the proposal. It is noted the meeting was held prior to the proponent's receipt of the Key Issues letter, and as such comprised a strategic discussion regarding key procedural matters.</p> <p>Predominately, the meeting consisted of discussion of the permissibility of the scheme and the appropriate approval pathway. It was agreed the proponent would submit a Site Compatibility Certificate in accordance with the ISEPP which was agreed as the preferred approval pathway, with the DPIE providing guidance on the process and assessment of the application. Additional matters included:</p> <ul style="list-style-type: none"> <li>• An update was provided by the proponent regarding the BDAR to address matters raised by Energy, Environment and Sustainability.</li> <li>• The DPIE recommended further dialogue with key authorities and resolution of design, heritage and public domain matters.</li> <li>• Further clarification of public usage of the site was requested.</li> </ul> <p>It was identified that construction phase matters that have been raised can be addressed within an updated CMP.</p>
	16 October 2019	<p>A subsequent meeting was held with the DPIE to specifically address the procedural requirements and assessment timeframe of the Site Compatibility Certificate. Importantly, it was agreed that the application could be lodged and assessed concurrently with the assessment of this RTS and PPR.</p>
City of Sydney	26 September 2019	<p>The proponent met with the City of Sydney to discuss key areas of concern identified within the submission received on 9 August 2019. Matters discussed include:</p>



Agency	Date	Summary of Consultation
		<ul style="list-style-type: none"> <li>Necessity of a Site Compatibility Certificate to demonstrate scheme permissibility.</li> <li>CoS and the proponent agreed the project was not exempt from the payment of Section 7.11 Contributions. It was agreed CoS will work with the proponent to determine the appropriate level of contribution required, as discussed within Section 5.3 of this RTS.</li> <li>Further clarity of public access to the site and usage, particularly timing and frequency of events, and the integration with the adjacent public plaza and surrounding public domain was requested.</li> <li>Urbis outlined the justification of the tree removal. CoS highlighted the proponent should demonstrate measures to minimise tree loss and maintain tree canopy.</li> <li>CoS expect and require the CPMPT to be engaged within the process, as CPMPT are the landowner of the site and ultimately the proponent of the SSDA. Further consultation has occurred in response to this comment.</li> <li>The requirement for a commercial waste contract to be in place prior to occupation was raised.</li> <li>CoS requested the proponent demonstrate innovation in reducing reliance on private motor vehicles.</li> </ul>
	4 October 2019 (teleconference feedback)	The proponent engaged with the CoS' Environmental Advisor to receive feedback on the ESD measures incorporated into the proposal, and to receive further clarity on the matters raised within the submission. The feedback received confirmed the CoS were content with the proponent's approach to target a 5-Star Green Star rating, which is discussed further in the revised ESD Report at Appendix K and within Section 3.4.
	21 October 2019 (email feedback)	Feedback received on 21 October 2019 provided further guidance and direction on the public usage of the site and the Draft Event and Operational Management Plan ( <b>Appendix P</b> ).
<b>Centennial Park and Moore Park Trust</b>	17 September 2019	A meeting was held with the CPMPT to discuss the matters raised in the CPMPT submission.
	16 October 2019	A subsequent follow-up meeting was held with the CPMPT to ensure the CPMPT's concerns had been addressed within the amended application.
<b>Government Architect NSW</b>	18 September 2019 (email feedback)	<p>Email feedback was received from the GANSW confirming additional consultation and Design Review Panels were not warranted for the project. The GANSW indicated that a suitable response to the design excellence matters should be detailed within the RTS, and that further consultation would occur post-lodgement of the RTS and PPR if necessary.</p> <p>All considerations raised by the GANSW have been responded to within the Design Report Addendum (<b>Appendix B</b>) and addressed within Section 5.1.</p>
<b>Mardi Gras</b>	20 August 2019 4 October 2019	The Sydney Swans have met with the Mardi Gras Organisation on a number of occasions to ensure the Mardi Gras remains informed and up to date as the project progress. This collaborative relationship will remain ongoing in the future, with subsequent meetings scheduled for November following the lodgement of this RTS and PPR. The collaborative relationship and support of

Agency	Date	Summary of Consultation
		the Mardi Gras Organisation for the proposal is represented within the organisation media release, provide at <b>Appendix U</b> .

It is noted Transport for NSW and NSW Heritage Council declined offers to meet during this period, and as such any additional consultation will be conducted during the assessment of this RTS and PPR.

The additional consultation exercises described above have provided an opportunity for further engagement with key agencies and resolution of matters identified within the submissions received, as summarised in Section 3.4. Design development of the scheme has ensured the successful resolution of these matters.

## 3. PUBLIC EXHIBITION AND SUBMISSIONS

This chapter addresses the submissions received during the public exhibition process both from the general public and organisations, and from State and local Government authorities and agencies. Any amendments to the proposed development resulting from those submissions received has been detailed in Section 4 and further assessed in Section 5.

### 3.1. AGENCY SUBMISSIONS

Submissions were received from 13 public agencies during the exhibition of the EIS, including:

- City of Sydney Council;
- Centennial Park and Moore Park Trust;
- Department of Primary Industries;
- Energy, Environment and Sustainability;
- Environmental Protection Authority;
- Government Architect of New South Wales;
- NSW Heritage Council;
- South Eastern Sydney Local Health District;
- Sydney Water;
- Transport for New South Wales;
- Transgrid;
- Sydney Cricket Ground Trust.

With the exception of the City of Sydney Council, none of the agencies objected to the SSD DA.

### 3.2. COMMUNITY SUBMISSIONS

Each submission from a member of the general public, including local residents, local or special interest groups, and other interested persons has been summarised. Because many submissions raise similar issues, rather than addressing each submission individually the issues raised in the submissions have been summarised and distinguished into categories as identified in Section 3.4. One submission was received from a public organisation, Saving Moore Park Inc. The organisation was supportive of the application, however requested additional information and clarification of a number of matters.

### 3.3. ANALYSIS OF SUBMISSIONS

A total of 22 submissions were received from the general public, interest organisations and agencies during the exhibition period of the project. Of these, 17 neither supported nor objected the proposal, 1 supported the proposal and four objected to the proposal.

Of the submissions received from the general public, 66% (six submissions) were identified as originating from postcodes within a 3-kilometre radius of the site comprising the suburbs of Paddington, Centennial Park and Darlinghurst. The remaining 33% (three submissions) were from other suburbs in Metropolitan Sydney including Sydney, Newtown and South Coogee, noting these are also all within a 5-kilometre radius of the site. This indicates that there is greater local interest in the project, and that the SSD DA has not appealed to a significant wider audience. Saving Moore Park Inc also originates from the local area and is a key interest group in the Moore Park precinct.

For each issue category that has been identified, Table 2 provides a high-level description of the matters raised in the submissions, a summary of the response, and a reference to where these issues have been covered in the detailed documentation as required. The identified issues have been discussed further in Section 5 of this Report which provides additional information and a justification where warranted.

### 3.4. SUMMARY OF SUBMISSIONS

Table 3 – Summary of public and organisation submissions by key issue

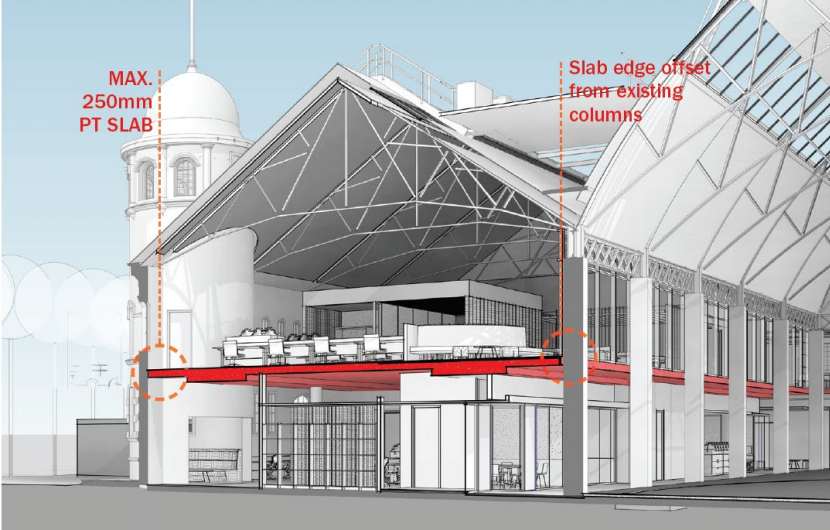
Issue	Summary of Issue	Response	Reference to Information
<u>Permissibility</u>	<ul style="list-style-type: none"> <li>The proposed land use is not permissible with consent on the site.</li> </ul>	<p>The proposed land use is permissible with consent on the site via two independent approval pathways. As discussed in Section 5.1, there is a valid approval pathway under both <i>State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)</i> and <i>State Environmental Planning Policy No 47—Moore Park Showground (SEPP 47)</i>. The proponent has demonstrated permissibility of the proposal under both pathways in order to mitigate any procedural or public concerns with the proposed land uses. Refer to Section 5.1 of this RTS and PPR.</p>	<b>Section 5.1</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Proposed use is outside of the scope of SEPP 47.</li> </ul>	<p>The proposal intends to repurpose the current vast exhibition halls of the RHI into an active, high-functioning mixed-use space that is publicly accessible.</p> <p>The pre-eminent objective of SEPP 47 is to “<i>enable the redevelopment of the Moore Park Showground in a manner that is consistent with its status as an area of importance for State and regional planning in New South Wales</i>”. The proposed application is entirely consistent with the intent of this objective as it intends to improve the training facilities and operation of the Sydney Swans and Sydney Swifts sporting teams, representatives of the Sydney community, and provides public access for 350 days per year into the facility, a stark comparison to the current underutilisation of the facility. The proposed SSDA respects and interprets the historical, social and cultural importance of both the RHI and the surrounding precinct, and ensures all adverse impacts are mitigated as outlined in Section 6 of this RTS and PPR.</p>	<b>Section 5.1</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>The reliance on ISEPP 2007 is invalid as there is no Site Compatibility Certificate (<b>SCC</b>) issued for the site.</li> </ul>	<p>The proponent has commenced preparation of a SCC application in accordance with clauses 18 and 19 of the ISEPP 2007. The DPIE have confirmed the concurrent assessment of both the SCC and this RTS and PPR, reaffirming that the ISEPP is an available approval pathway for this project. Refer to further discussion of the permissibility of the application under the ISEPP 2007 within Section 5.1 of this RTS and PPR.</p>	<b>Section 5.1</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
<u>Precinct Integration</u>	<ul style="list-style-type: none"> <li>The development is not classified as SSD under <i>State Environmental Planning Policy (State and Regional Development) 2011 (SARD SEPP)</i> as the land use is not classified as “development permitted with consent” and as such the proposal does not satisfy Clause 8 of the SARD SEPP.</li> </ul>	The proposed SSDA fulfils the requirements outlined in Clause 8 of the <i>State Environmental Planning Policy (State and Regional Development) 2011 (SARD SEPP)</i> , as discussed in Section 5.1 of this RTS and PPR. In summary, as the proposed SSDA seeks consent for <i>demolition and car parking and</i> has a capital investment value of greater than \$10 million, the proposal can be assessed as a State Significant Development (SSD) application.	Section 5.1.2 of this RTS
	<ul style="list-style-type: none"> <li>Question of consistency of the proposal against the Entertainment Quarter Concept Plan approval, specifically the GFA and urban design of the proposal.</li> </ul>	<p>The proponent has undertaken an assessment of the consistency between the proposal and the Entertainment Quarter (<b>EQ</b>) Concept Plan approval (MP07-0144). Whilst it is acknowledged the EQ approval sought consent for development on the site up to 144,000sqm (the floor space cap under clause 16 of SEPP 47 for the ‘diagonally hatched’ precinct within which the site is located) this floor space has not yet been built on the site nor has a detailed application been submitted seeking consent for the use of this floor space. Until such consent is provided, there is no impediment to the assessment and determination of a concurrent application that is subject to the same development standards.</p> <p>In addition to the built form consistency, the proposal has also been assessed to demonstrate consistency with the urban design elements of the EQ Concept Plan approval. These elements include entrances and addresses, urban structure, key views, car parking and access, floor space allocation, material, form and detail, and “Building G” located within the EQ opposite the subject site. Refer to Addendum Design Report at <b>Appendix B..</b></p>	Addendum Design Report at <b>Appendix B.</b>
	<ul style="list-style-type: none"> <li>A Public Domain Integration Plan is requested.</li> <li>Public domain between RHI, Hordern Pavilion, Driver Avenue and Errol Flynn Boulevard will be delivered in a fragmented and uncoordinated manner. Specific concern is raised regarding access, linkages and physical public domain works.</li> <li>Unrestricted access is requested for this space. Clarification requested of</li> </ul>	<p>The integration of the precinct is achieved through the coordination of the public domain and landscaping design of all three projects by a common landscape architect (Arcadia), the adoption of consistent design principles in all three projects and implementation of construction management measures to ensure coordination during construction.</p> <p>Arcadia have prepared a Precinct Public Domain Plan, illustrating the integration of the public domain across the RHI, public plaza and Hordern Pavilion site. Whilst consent for the detailed design of the public plaza is sought under a separate local application (D/2019/830), four primary</p>	Public Domain Integration Plan at <b>Appendix H, Section 5.4</b> and <b>Section 6</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
	<p>the design and development of the plaza.</p> <ul style="list-style-type: none"> <li>Activation in the area between RHI and Hordern Pavilion is recommended. The proposal should not preclude or constrain opportunities for future access and activation within the plaza.</li> </ul>	<p>principles have been developed and implemented across the entire site redevelopment to achieve integration and consistency as follows:</p> <ul style="list-style-type: none"> <li>Consistency in materiality</li> <li>Complimentary tree species and planting</li> <li>Continuous sightlines</li> <li>Ease of movement throughout the precinct</li> </ul> <p>Refer to discussion and assessment within Section 5.4 of this RTS.</p> <p>The construction and operation of the proposed SSDA will not preclude access to the public plaza, rather the proposal will enhance the operation of the plaza through the creation of an integrated, seamless precinct; noting the importance of this plaza as a path of travel linking transport nodes and the Entertainment Quarter.</p>	
<u>Bulk, Scale and Architectural Design</u>	<ul style="list-style-type: none"> <li>Clarification required if proposed massing has support of the State Design Review Panel (SDRP).</li> </ul>	<p>During the pre-lodgement process, two meetings were held with the SDRP to enable the consideration of alternative design options, specifically three massing options which explored alternative built form approaches for the NSB. At the final SDRP meeting, it was concluded Option 2, which was developed into the June submission, was the preferred approach for the site and had the support of the SDRP. Discussion on this process and the alternative options is provided in the Addendum Design Response at <b>Appendix B</b> and the submitted Design Report within the June SSDA lodgement package.</p> <p>An additional follow up meeting with the SDRP was requested, however the Panel concluded this was not necessary and additional review would occur following submission of the RTS if required.</p>	Addendum Design Response at <b>Appendix B.</b>
	<ul style="list-style-type: none"> <li>Concern raised regarding the incorporation of the heritage wall into the NSB.</li> <li>Installation of box gutter to the rear of the heritage wall is not suitably sized for weather events.</li> </ul>	<p>Populous have provided additional information and justification for the heritage wall and box gutter along the southern elevation of the NSB. In summary, the proposal incorporates the heritage wall for two primary reasons:</p> <ul style="list-style-type: none"> <li>Encapsulating the wall into an internal environment will allow the wall to be preserved and appreciated in an indoor controlled environment.</li> </ul>	Addendum Design Response at <b>Appendix B.</b>



Issue	Summary of Issue	Response	Reference to Information
		<ul style="list-style-type: none"> <li>The existing heritage wall requires repair and additional support bracing. With the removal of the existing wall segment along Errol Flynn Boulevard due to CMPT's boundary realignment, these issues will be further compounded and would not pass structural adequacy to be left independent. By incorporating the wall into the NSB, the structural columns will brace this wall neatly with the roof structure.</li> </ul> <p>The box gutter is suitably sized for anticipated weather events and is easily accessed for maintenance via the adjacent public footpath on Lang Road.</p>	
	<ul style="list-style-type: none"> <li>A number of outstanding matters raised by the Government Architect NSW (<b>GANSW</b>) have not been addressed.</li> <li>Impact of the volume of proposed internal program within the RHI on the significance and value of the RHI.</li> <li>Mezzanine reads as a sensitive insertion</li> <li>Location of toilets is inefficient</li> <li>A positive entry experience is delivered</li> <li>Provision of a corridor outside of the internal columns.</li> </ul>	<p>Populous have prepared an Addendum Design Response to respond to each of the concerns raised within the GANSW submission (<b>Appendix B</b>). In summary:</p> <ul style="list-style-type: none"> <li>Populous have undertaken a Massing Study to investigate alternative options for program location, including the re-location of programming above the NSB. This option presents an unacceptable impact on the heritage significance, architectural appreciation and visual corridors of the RHI. As such, it can be concluded the proposed programming presents the most suitable approach to the site and accommodates the proponent's needs, whilst also respecting the significance of the RHI.</li> <li>A clear architectural philosophy has been adopted since the commencement of the design process. This is built upon a number of design principles, including celebrating the vast internal volume of the RHI, retention of existing architectural elements and use and insertion of readily removable floors and walls. Refer to further discussion in the Addendum Design Report.</li> <li>The location of the toilets has been reviewed however it has been concluded this is the most appropriate solution. The design allows for public access to toilets during events without requiring access to the private commercial office areas.</li> <li>The proposed mezzanine is structurally independent of the existing RHI building. The columns for the new mezzanine are new and separate to the existing columns and can be removed at the completion of the lease with limited impact to the existing slab and foundations. As illustrated in the below figure, the 2500mm slab is offset from the existing columns.</li> </ul>	Addendum Design Response at <b>Appendix B.</b>

Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>Articulation of the NSB façade is raised as a matter for concern.</li> </ul>	<p>Figure 1 – Structurally independent mezzanine slab</p>  <p>Source: Populous</p> <p>It is further noted the CPMPT in their submission (August 2019) was supportive of the adaptive reuse of the RHI and the proposed internal alterations and concluded that the spatial experience of the powerful central vaulted interior space was preserved. This is in addition to support provided by the CoS in their submission (August 2019) for the bulk, scale and siting of the NSB.</p> <p>The facade of the NSB is articulated with consideration to its corner location on Lang Road and Errol Flynn Boulevard and its location neighbouring the RHI through adoption of appropriate built form parameters and materials. The NSB remains respectful to the surrounding context through built form measures including building siting along the splayed angle of Lang Road, 4.9m building separation and consistency of horizontal datums between the RHI and NSB. Further articulation is achieved through use of a lightweight, transparent building material and glass; plain during the day to allow appreciation of the RHI and lit during the evening to provide activation and safety within the precinct after dark.</p>	<p>Addendum Design Response at <b>Appendix B</b> and <b>Section 5.2</b> of this RTS and PPR.</p>

Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>The exterior alterations to the RHI will have an adverse visual impact.</li> </ul>	<p>Refer to further discussion of the design response in <b>Section 5.2</b> of this RTS and PPR.</p> <p>Due to the high heritage significance of the façade of the RHI exterior alterations have been minimised in order to retain the existing architectural integrity and character of the building. Exterior alterations to the building include removal of doorway infill, replacement of frosted glass, skylight insertions, removal of additional services and lightweight annex along the southern elevation of the building. These alterations are appropriate as follows:</p> <ul style="list-style-type: none"> <li>The removal of the retrofitted plant on the southern elevation of the building will have a positive visual impact on the building and enable an improved appreciation of the RHI from all viewpoints surrounding the site. The removal of this material and insertion of a high-quality building in its place represents a positive visual and heritage outcome for the site.</li> <li>The removal of the doorway infill to create additional entries will have a positive visual and operational impact on the RHI and will reinstate the original purpose of the existing window opening. It is further noted these works will not impact the original openings and will retain the original quoining around the window opening. These works are a positive addition to the building, noting the works will also enable increased public access and permeability throughout the site.</li> <li>The replacement of the existing frosted windowpanes with clear glass will achieve design consistency across the façade, creating a consistent façade response and improved visual presentation to surrounding viewpoints.</li> <li>The proposed roof treatment and skylight inserts will not have any visual impact as it is not visible from the surrounding public domain.</li> </ul>	Revised Architectural Plans at <b>Appendix A</b> and revised Heritage Impact Statement at <b>Appendix D</b>
	<ul style="list-style-type: none"> <li>NSB has an adverse impact on the architectural character of the RHI and the “pavilion style” perspective of the RHI.</li> </ul>	<p>The sitting, massing and articulation of the NSB has been sensitively considered in order to retain the significance of the RHI building as the key focal point on the site, whilst enabling the development of the southern courtyard and maximising the potential of the precinct.</p> <p>This has been achieved through a number of design strategies including provision of a 4.9m building separation to the RHI, façade articulation, use of corresponding height datums and use of translucent cladding and glass to create a lightweight transparency.</p> <p>This design response is supported based on heritage grounds by Urbis (<b>Appendix D</b>) and by key agencies including the State Design Review Panel, City of Sydney and CPMPT.</p>	Revised Heritage Impact Statement at <b>Appendix D</b> .

Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>Provide a breakdown of GFA of all uses.</li> </ul>	<p>Minor changes to internal floor space and a re-calculation of the GFA has resulted in a revised total GFA of 10,636.5sqm.</p> <p>This represents a total GFA of 7,288.5sqm within the repurposed RHI building, and a total GFA of 3348sqm within the NSW Swifts Building. Refer to further discussion in Section 4.</p>	<p>Revised Architectural Plans at <b>Appendix A</b> and <b>Section 4</b>.</p>
<u>Heritage</u>	<ul style="list-style-type: none"> <li>Concern raised of the impact of the works on the heritage integrity of the RHI.</li> </ul>	<p>Urbis Heritage confirm the proposed adaptive reuse of the RHI is supported on heritage grounds and is consistent with the principles outlined in the Conservation Management Plan (Appendix E) for the site. The proposed works have been assessed against the relevant statutory and heritage guidelines, including the Burra Charter, CMP, SEPP 47, Moore Park Conservation Strategy 1995 and Heritage Division Guidelines.</p> <p>The aesthetics, activation, usability and amenity of spaces within the RHI will be greatly enhanced as a result of the proposed development, as will the appreciation of the architectural and heritage values of the building. The proposed works will not have an adverse impact on the heritage integrity of the RHI as follows:</p> <ul style="list-style-type: none"> <li>The proposed mezzanine will be setback from the fabric of the building and structurally independent through the installation of self-supporting lightweight structures.</li> <li>The mezzanine retains a double-height void above the multi-purpose space, and as such the substantial internal volume, original roof trusses within the central roof space and colonnades along the central spine will be maintained.</li> <li>Key vistas along the barrel of the RHI and original components of the roof structure is retained.</li> <li>There is no change to the original building envelope, and the majority of fabric original to the 1912 construction will be retained including the roof trusses and the showbag sign to the exterior, northeast corner.</li> <li>The structural insertions can be reversed and removed if required, enabling the internal spaces to adapt and change for future uses.</li> <li>The existing frosted glass proposed for removal on the site as the glass is non-compliant and unlikely to be able to be reinstated in the future, and is a combination of varying glass types and thus not original (refer to Window Glazing Investigation Report at <b>Appendix F</b>). Notwithstanding this, a representative sample will be retained within the basement storage area.</li> </ul>	<p>Revised Heritage Impact Statement at <b>Appendix D</b>, Conservation Management Plan at <b>Appendix E</b> and <b>Section 6</b> of this RTS and PPR.</p>

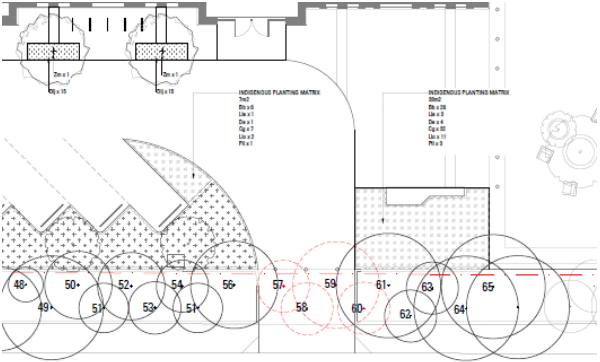
Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>Arrangements for storage of heritage fabric</li> </ul>	<ul style="list-style-type: none"> <li>All original joinery required to be removed will be stored on site, within the basement storage area.</li> </ul> <p>Refer to the Revised Heritage Impact Statement at <b>Appendix D</b> and site-specific Conservation Management Plan at <b>Appendix E</b>.</p> <p>In accordance with the Revised Heritage Impact Statement at <b>Appendix D</b>, all original timber joinery required to be removed will be stored on site within the basement storage area. A representative sample of the frosted window treatment will also be retained. It is not considered necessary to retain all of the removed frosted windowpanes as much of the façade glazing constitutes later fabric and is not heritage significant.</p> <p>A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p>	Revised Heritage Impact Statement at <b>Appendix D</b> .
	<ul style="list-style-type: none"> <li>Clarification of extent of reversibility</li> </ul>	<p>The proposed alterations and additions to the RHI contain an element of reversibility to allow for the ongoing adaption and reuse of the building in the future, consistent with the historical accommodation and adaption to suit varying uses.</p> <p>The proposed mezzanine is structurally independent of the original fabric and is designed to be reversible. This loose fit approach ensures there is no physical impact on the internal colonnade and the building can be returned to its original single level floor plan. The reversibility of the interior addition will allow the interior hall to adapt and change for future uses following the Swan's 27-year lease. It is further noted within there is a 'make good' clause within the Lease prepared by the CPMPT as the landlord in order to ensure the works undertaken during the extent of the lease are reversible. The works are therefore reversible on a contractual, heritage and architectural basis.</p> <p>The storage of the existing timber joinery following removal will allow for the reinsertion of this joinery if desired in the future.</p>	Revised Heritage Impact Statement at <b>Appendix D</b> and <b>Section 6</b> of the RTS and PPR.
	<ul style="list-style-type: none"> <li>The heritage assessment is insufficient as the provisions of <i>State Environmental Planning Policy No. 47 (Moore Park Showground)</i> (SEPP 47) and the Burra Charter have not been accounted for and the</li> </ul>	<p>The HIS includes an assessment of the proposed SSDA against the Burra Charter, the draft Conservation Management Plan 2007 developed by the GANSW for the RHI (provided at <b>Appendix E</b>) and the heritage considerations of SEPP 47. The HIS concludes that the revised</p>	Revised Heritage Impact Statement at <b>Appendix D</b> , Conservation

Issue	Summary of Issue	Response	Reference to Information
	Conservation Management Plan has not been submitted.	Preferred Project is supportive based on heritage grounds and that the proposed works are consistent with the adaptive reuse principles of the Burra Charter.	Management Plan at <b>Appendix E</b> .
	<ul style="list-style-type: none"> <li>NSB contrasts and is not sympathetic to the RHI.</li> </ul>	<p>The design of the NSB uses a consistent architectural language to ensure a unified design response across the site and with the RHI, for example the use of consistent horizontal datums across the site and corresponding height of the first floor roof level of the NSB and height of the RHI eaves. Further, the NSB has been designed in the spirit of the RHI and Hordern Pavilion as a robust building capable of multiple future uses and potential adaptation.</p> <p>In accordance with the Burra Charter general principles for conservation, the NSB also contrasts with the RHI to ensure there is a clear distinction between new and old. This seeks to ensure a clear reading of the heritage building so as not to detract from its historical integrity. This has been achieved through use of a lightweight building form and materials and splayed siting of the building away from the principal east façade of the RHI.</p>	Revised Architectural Plans at <b>Appendix A</b> and <b>Section 6</b> of the RTS and PPR.
	<ul style="list-style-type: none"> <li>The incorporation of the heritage brick wall into the NSB will have an adverse impact on historical and aesthetic values.</li> </ul>	<p>The heritage brick wall is currently under appreciated due to the use of the southern courtyard as a services area. The incorporation of the Lang Road brick wall into the NSB will improve appreciation of the wall through facilitating internal expression of the heritage wall and protection within a controlled environment. The SSDA will have a positive impact on the heritage brick wall, allowing for a celebration of its significance and elevation into an architectural feature.</p> <p>It is noted Level 1 of the NSB is further setback from the heritage wall, ensuring there is a negligible impact on heritage significance.</p>	Revised Architectural Plans at <b>Appendix A</b> and Revised Heritage Impact Statement at <b>Appendix D</b> .
	<ul style="list-style-type: none"> <li>The NSB will have an adverse impact on significant sight lines to and from adjacent heritage items.</li> </ul>	The Revised HIS includes an impact assessment of the proposed SSDA on significant view corridors within the surrounding public domain. In summary, the views towards the RHI are not considerably affected by the SSDA due to existing impediments to view corridors (such as trees, walls and existing buildings) and the siting of the NSB in a historically back of house area with insignificant view corridors.	Revised Heritage Impact Statement at <b>Appendix D</b> .
	<ul style="list-style-type: none"> <li>Ongoing appreciation and understanding of the heritage fabric and history of the RHI.</li> </ul>	The proposal incorporates a museum and memorabilia area that will enable the ongoing heritage appreciation of the RHI building and Sydney Swans history. This museum is proposed within the north-eastern corner of the ground floor and has direct public access from the eastern elevation.	Revised Architectural Plans at <b>Appendix A</b> and



Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>Clarification if a museum is proposed within the facility.</li> </ul>		revised Heritage Impact Statement at <b>Appendix D</b> .
	<ul style="list-style-type: none"> <li>Detailed drawings of all new interventions into the RHI including elevations and sections of new openings, windows and doors.</li> </ul>	Detailed drawings are included within the revised Architectural Plans at <b>Appendix A</b> .	Revised Architectural Plans at <b>Appendix A</b> .
<u>Public Domain</u>	<ul style="list-style-type: none"> <li>The fire services, kiosk and bin storage structure erode the positive view corridors and clutter the public domain improvements along Errol Flynn Boulevard.</li> </ul>	The proponent has undertaken a subsequent review of the public domain along the eastern portion of the site. A redesign to improve the relationship with the surrounding public domain, involving removal of the proposed waste storage area and additional screening to the external fire services annex and kiosk is proposed. Refer to Section 4 of this RTS and PPR. These revisions de-clutter the public domain and contribute to improved view corridors from the south-east towards the RHI.	Revised Landscaping Plans at <b>Appendix C</b> and <b>Section 4</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>The proposal will result in an increase in local patronage and use of public transport and should be accompanied by public domain improvements including footpath upgrades, provision of a shared path along the western side of Errol Flynn Boulevard and pedestrian crossings.</li> </ul>	The proposal delivers significant improvements to the site and surrounding public domain when compared to the existing condition. As outlined in Section 5.3 of this RTS and PPR, the Section 7.11 Contributions generated by the proposal will be significant to support the funding of infrastructure in the LGA, which will be utilised for the works program outlined in the Contributions Plan including open space works, community facilities and traffic and transport upgrades. The Sydney Swans agree to the payment of contributions in accordance with an agreed calculation. Refer to Section 5.4 of this RTS and PPR.	<b>Section 5.4</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>The proposal provides a balance of outdoor relaxation areas and public entertainment areas to service all user groups.</li> <li>Adequate shade and water fountains are provided.</li> </ul>	<p>The public domain within the site has been sensitively designed to ensure the space provides for a variety of both passive and active uses and responds to community needs. It is however noted the public domain proposed within the site will complement the primary public domain within the central plaza to the immediate north of the site. Whilst the public domain within the site has sufficient amenity and circulation to allow members of the public to dwell and relax, it is expected these activities will predominately occur in the central plaza.</p> <p>Notwithstanding this, the proposed public domain improvements include a significant increase in site landscaping to provide shade and amenity, seating areas within the laneway to provide spaces</p>	Revised Landscaping Plans at <b>Appendix C</b> and <b>Section 5.5</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
		for relaxation and an outdoor café seating area on the north-eastern corner of the RHI for public usage. The provision of water fountains will be accounted for during the detailed design stage.	
	<ul style="list-style-type: none"> <li>Pedestrian and vehicular conflict due to use of vehicular spaces.</li> </ul>	The preparation of a Construction Pedestrian and Traffic Management Plan ( <b>CPTMP</b> ) is recommended to be included as a condition of consent. This CPTMP will be implemented throughout the construction of the proposal, reducing any potential for vehicle and pedestrian conflict.	<b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Cyclists and pedestrians may get lost in the precinct without adequate signage.</li> </ul>	The detailed design of the proposal will involve the erection of wayfinding signage throughout the precinct to assist visitors to be delivered during the detailed design phase, implemented prior to the issue of an Occupation Certificate. This will be complemented with the public domain and landscaping improvements which create a highly legible precinct and mitigate any concerns associated with wayfinding and legibility.	Revised Landscaping Plans at <b>Appendix C</b> .
<u>Landscaping</u>	<ul style="list-style-type: none"> <li>Landscape planter bed along the eastern and southern perimeter walls of the RHI will adversely impact the integrity of the heritage masonry.</li> <li>Insufficient information submitted of the width of tree pits and the planters on-slab.</li> </ul>	<p>The proposed landscaping planter beds along the eastern and southern perimeter walls have been removed from the proposal, noting the potential adverse impact on the RHI. Notwithstanding this, the PPR has a greater level of planting than originally proposed, with 26 proposed trees in the PPR compared to 16 trees proposed in the June lodgement. Refer to Section 4 of this report for further detail of the amendments.</p> <p>The revised Landscaping Plans at <b>Appendix C</b> contain detailed Section Plans of the planting condition on the ground and roof slab, tree pits and Indigenous planting matrix.</p>	Revised Public Domain and Landscaping Plans at <b>Appendix C</b> and <b>Section 4</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>The proposed trees are not of a size or species to provide a sufficient canopy and meet the CoS 15% canopy requirement. The use of exotic or non-local natives are not appropriate for the site.</li> </ul>	The landscaping solution for the site proposes a mix of native species including a number of Indigenous planting species such as Birds Nest Fern, Silver Lady, Tree Fern and Cycad. The proposed tree selections are proposed to ensure a low impact on the heritage of the building at installation and in the future. Whilst the tree selection is inconsistent with the CoS canopy requirement, the provision of a consistent canopy requirement would detrimentally harm the heritage fabric of the RHI and would interrupt view corridors and appreciation of the architecture of the building. The tree selection harmonises, rather than competes with, the rhythm of the heritage features of the RHI façade and is a better outcome than what would be delivered via a compliant tree canopy.	Revised Public Domain and Landscaping Plans at <b>Appendix C</b> .

Issue	Summary of Issue	Response	Reference to Information
<p><u>Tree Loss</u></p>	<ul style="list-style-type: none"> <li>• Inconsistency between submitted documentation regarding the number of trees to be removed.</li> <li>• Tree removal will have an adverse impact on the biodiversity of the area and will not assist in mitigating the urban heat island effect. Consider options to maximise tree retention.</li> </ul>	<p>The PPR proposes the removal of four trees on the north-eastern portion of the site in order to enable the construction of the northern vehicular crossover. Pruning of two trees along the southern boundary of the site is also proposed to enable the development of the NSB, however the pruning will not impact the health of the trees. It is noted this represents a reduction in tree loss from seven to four trees compared to the June submission due to a reconsideration of the site access and removal of the pedestrian player and staff pedestrian entry on the eastern boundary. These design revisions aim to maximise tree retention and demonstrate a commitment by the proponent to retain green cover.</p> <p>Figure 2 – Trees for removal</p>  <p>Source: Arcadia</p> <p>The trees proposed for removal include four <i>Corymbia maculata</i> (spotted gum). Based upon the original Arborist Report submitted within the June SSDA submission, the health of these trees varies in quality from low-medium significance and do not represent a highly significant contribution to the site and surrounding landscaped context. The impact of the removal of the four trees will be mitigated through the planting of 23 additional trees on ground level and 3 trees on level 1, planting of complementary shrubbery, grasses and ferns, and the implementation of protective tree measures to ensure no additional trees are impacted by the proposed works.</p>	<p>Revised Landscaping Plans at <b>Appendix C</b>, addendum Arborist Report at <b>Appendix F</b> and <b>Section 4</b> of this RTS and PPR.</p>

Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>The trees are planted as linear verge planting and it is likely construction will impact the interconnecting root systems.</li> </ul>	As outlined in the Arborist Addendum ( <b>Appendix F</b> ), test pit excavations have been undertaken in order to establish a greater level of understanding of the subsurface root extensions and density, and the associated impact of the works on the health of the trees. Two test pits were excavated to 400mm in depth and 250mm in width. In summary, the test pits indicated the predominant root system extends 200mm below grade; a similar depth to that required for the excavation and construction of the proposed exposed agg concrete surface. As the root depths and level of excavation for the paving is of a similar depth, it is expected the exiting root systems will be able to withstand the proposed works without major impact on the health and viability of the root systems. In accordance with the protection measures outlined in the Arborist Addendum, an onsite project arborist will ensure any unearthed root system is cleanly cut utilising hand tools or air spade, with no machinery utilised within any area of the 1.5m TPZ surrounding the trees.	Addendum Arborist Report at <b>Appendix F</b> and <b>Section 5.6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Impact of construction on the health of trees surrounding the site and the 5 palms on the south-eastern corner of the site.</li> </ul>	The five palms will be retained through construction methodology involving stem protection, staged demolition of the surrounding planter box, installation of a protective fence and retention of existing irrigation system. Refer to recommended methodology within the Arborist Addendum at <b>Appendix F</b> .	Arborist Addendum at <b>Appendix F</b> .
<u>Biodiversity</u>	<ul style="list-style-type: none"> <li>The proposed construction works, and operation of the facility will have an adverse impact on Microchiropteran bats which may roost within the site.</li> </ul>	<p>In response to EES' comments, Eco Logical Australia were engaged to undertake a microbat survey at the site to determine the level of impact of the SSDA on the potential roosting habitats. The investigations involved a visual survey of potential microbat roosts, an unattended Anabat detection survey and a bat call analysis. The results of the survey are provided in the Microbat Survey Report at <b>Appendix Q</b>.</p> <p>In summary, three species were identified within the survey with one additional species identified as potentially present. The <i>Miniopterus orianae oceanensis</i> (Large bent-winged bat) was identified within the survey, a species listed as 'vulnerable' status under the <i>NSW Biodiversity Conservation Act 2016</i>. The species is not however listed under the <i>Commonwealth Environmental Protection and Biodiversity Conservation Act 1999</i>.</p> <p>The RHI does not typically constitute a breeding habitat for large bent-winged bats, however the results suggest that the species are roosting nearby with a possibility individuals or small numbers currently roost within the RHI.</p>	Microbat Survey Report at <b>Appendix Q</b> .

Issue	Summary of Issue	Response	Reference to Information
		In accordance with the above findings, a Biodiversity Development Assessment Report ( <b>BDAR</b> ) is currently being prepared. The report will assess the prescribed biodiversity impact on the vulnerable species, the impact on native vegetation and impact on habitat for threatened species in line with the Biodiversity Assessment Method. The BDAR will be submitted to the DPIE for referral to the EES upon completion.	
	<ul style="list-style-type: none"> <li>Clarification required if the removal of the final number of trees will impact the grey-headed flying fox.</li> </ul>	<p>The site forms a potential habitat for the grey-headed flying fox. An assessment prepared by Ecological and lodged within the SSDA package (June 2019) concluded the habitat on the subject site represents only a very small portion of the habitat needs of these species, and more suitable habitat occurs in the locality particularly within the adjacent Centennial Parklands. As the Grey-headed Flying-fox is a wide-ranging and mobile species, there will be no significant impact on the species. As the Preferred Project involves a reduction in the number of trees to be removed (four in the Preferred Project rather than seven as proposed in the June lodgement), there will be a lesser impact on the grey-headed flying fox.</p> <p>Notwithstanding this, a revised assessment of the impacts of the proposal on any threatened species, including the grey-headed flying fox, will be included within the BDAR and submitted upon completion to further alleviate any concerns regarding the impact on the flying fox.</p>	
<u>Vehicular Access and Parking</u>	<ul style="list-style-type: none"> <li>The overview Green Travel Plan (<b>GTP</b>) does not demonstrate targets to reduce private vehicle usage, and ongoing monitoring of the implementation of the overview GTP is unclear.</li> </ul>	<p>The Traffic and Parking Report prepared by GTA and submitted within the SSDA June Lodgement package included an Overview Green Travel Plan (GTP) to provide an indication of the measures the proponent would utilise to reduce private vehicle usage. As the Plan was an overview, and not a finalised document, detailed operational measures such as monitoring were not included in the plan and will be explored within the finalised document to be prepared prior to OC. Ongoing monitoring of the plan would be undertaken on a regular basis, and in line with City of Sydney requirements an Annual Performance Report would be submitted for the first 5-years of operation. In accordance with TfNSW's recommendation, a suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p> <p>In addition to the preparation and implementation of the final GTP, GTA have listed a number of additional locational-specific measures to reduce private vehicle usage and promote sustainable travel choices. This includes provision for a 5-year plan to implement a travel mode target of 60% private car usage, representing a 30% shift to sustainable travel modes compared to existing staff</p>	Traffic and Parking Addendum at <b>Appendix J</b> and <b>Section 6</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
		<p>surveys. This plan can be updated on a 5-year basis, incrementally decreasing public car usage to improve the sustainability of the broader precinct.</p> <p>Additional measures include:</p> <ul style="list-style-type: none"> <li>• Establish an internal Bicycle Users Group and develop a “bike buddy” scheme</li> <li>• Review bicycle parking regularly to meet peak needs and upgrade as required</li> <li>• Supply a workplace bicycle toolkit</li> <li>• Participate in annual “Ride to Work Day” events</li> <li>• Maintain a staff notice board with maps of public transport routes</li> </ul>	
	<ul style="list-style-type: none"> <li>• The environment presents potential conflict for pedestrians and cyclists due to loading, servicing and removal of existing fence line.</li> </ul>	<p>The site access arrangement and one-way circulation has been well designed with consideration of all users as part of design development. The one-way circulation reduces the complexity of traffic movements, ensuring pedestrians and cyclists are afforded a high level of visibility within the site.</p> <p>While the boundary fences are proposed to be removed, landscaping and designated footpaths will ensure pedestrians remain on the identified paths of travel. Further, the erection of appropriate safety and wayfinding signage during the design development stage will further enhance the legibility of this area. It is noted the delivery of a substantial area of public domain within the future plaza to the immediate north of the site will encourage pedestrians to utilise this space as a primary access route and gathering point.</p>	Traffic and Parking Addendum at <b>Appendix J</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>• Provide further detail of bicycle parking and EOTF.</li> </ul>	<p>Bicycle parking has been implemented within the eastern boundary and central laneway. Bicycle parking for a total of 32 bicycles is provided within the site, available for use by staff and visitors. The location of these spaces is highlighted within the Landscaping and Public Domain Plan at <b>Appendix C</b>. The provision is consistent with the Green Star Design and As Built guidelines which requires a bicycle parking for a total of 30 bicycles.</p> <p>It is noted that additional facilities within the broader Entertainment Quarter precinct are also available for public use should there be any unexpected ‘spikes’ in demand. The finalised Green Travel Plan will suitably monitor usage over time to ensure appropriate provision.</p>	Revised Landscaping and Public Domain Plan at <b>Appendix C</b> and Traffic and Parking Addendum at <b>Appendix J</b> .



Issue	Summary of Issue	Response	Reference to Information
		In regard to EOTF, the site accommodates provision for male and female amenities including showers, lockers and changing room spaces. These facilities have been purpose-built for staff, further encouraging a shift to active transport methods and a reduced reliance on private car usage.	
	<ul style="list-style-type: none"> <li>Environmental impact of car usage during operation</li> </ul>	<p>As an environmental sustainability initiative to promote sustainable travel, as of November 2019 the Sydney Swans have removed the company-funded staff parking incentive in the adjacent Entertainment Quarter car park. This provides a transitional period to allow staff to utilise public transport networks to access the site prior to the occupation of the RHI and construction of the NSB.</p> <p>Without this paid parking incentive, it is expected the majority of staff travelling to the site will utilise public transport as a more convenient, cheaper and direct travel option. It is further noted the imminent delivery of the CBD South East Light Rail (<b>CSELR</b>) in December 2019 will have a substantial impact on staff travel behaviours as this will improve public transport connectivity to the site.</p> <p>The staff behavioural shifts and infrastructure improvements will significantly reduce usage of cars accessing the site and mitigate environmental impacts associated with the SSDA.</p>	Traffic and Parking Addendum at <b>Appendix J</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Impact of additional density and usage on the capacity of surrounding roads, and the consequential impact on public access throughout the precinct.</li> </ul>	<p>The Traffic and Parking Assessment prepared and submitted within the June SSDA lodgement package contained a detailed analysis of the proposal on the operation of the surrounding road network. The SIDRA modelling indicated that whilst some congestion is recognised in the area, including along Lang Road, the modelling confirms that the proposal will generate minimal impact to overall traffic conditions in the immediate vicinity. An overall intersection LOS B represents an acceptable level of intersection operation.</p> <p>With the removal of the staff parking incentive and commencement of CSELR, it is expected that proportional travel by private vehicle will reduce and further limit the traffic related impacts associated with the proposal.</p>	Traffic and Parking Addendum at <b>Appendix J</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Sufficient access is provided for people with a disability, particularly</li> </ul>	The proponent is dedicated to providing convenient and equitable access to all users. The provision of parking on the eastern portion of the site has been revised to incorporate one	Landscaping Plans at <b>Appendix C</b> and

Issue	Summary of Issue	Response	Reference to Information
	with regard to the drop off and parking spaces.	<p>accessible parking space, with an adjacent shared area with a bollard in accordance with the Australian Standard AS2890.6:2009.</p> <p>In accordance with the <i>Building Code of Australia</i>, equitable at-grade access is provided at all entries into the site. Further, four lifts are provided in the RHI with three providing access to ground level and level 1, and one providing access to basement, ground level and level 1. An additional lift is provided in the NSB providing access to all levels.</p>	Traffic and Parking Addendum at <b>Appendix J.</b>
	<ul style="list-style-type: none"> <li>Clarification required regarding passenger pick up and drop off arrangements, how these arrangements are managed and the impact of these arrangements on the surrounding road network.</li> </ul>	<p>It is acknowledged the unique nature of the mixed-use proposal generates various access requirements for the site. However, given that the primary function is to accommodate the Sydney Swans and NSW Swifts head office and day-to-day staffing requirements, formal set-down/ pick-up facilities are not essential and as such are not provided within the site boundaries. This is an appropriate solution as follows:</p> <ul style="list-style-type: none"> <li>During Swans Academy periods when children are expected to access the site, it is expected children would be dropped off in the adjacent EQ car park and walked to the site utilising the existing pedestrian infrastructure across Errol Flynn Boulevard linking the site and the car park. A similar arrangement is expected for pick up procedures. This process will be appropriately managed by Swans Academy staff to ensure the area operates safely and efficiently.</li> <li>Travel by coach is not expected to be required. The proponent has indicated that the Swans and Swifts team typically do not travel to training destinations by coach due to the wide catchment of players across NSW. Similarly, the Swans Academy does not provide a mini-bus or coach pick up service. Notwithstanding this, the proposed vehicular arrangements provides circulation for vehicles up to 8.8m long, allowing for minibuses (such as a Toyota Coaster) to pick up and set down passengers within the site boundary during exceptional circumstances. This will be managed by the Swans staff to ensure there is no queuing onto Errol Flynn Boulevard.</li> <li>During major events within the Moore Park precinct, there will be no passenger pick up and drop off accommodated within the site and public access to the site will be restricted. This will be enforced by removable bollards within the site and traffic control as part of the Entertainment Quarter major event measures. This is consistent with existing measures and will not have an adverse impact on the traffic operation of the site and surrounding locality.</li> </ul>	Traffic and Parking Addendum at <b>Appendix J</b> and Revised Waste Management Plan at <b>Appendix K.</b>

Issue	Summary of Issue	Response	Reference to Information
	<ul style="list-style-type: none"> <li>Clarification required regarding measures to mitigate traffic impacts during simultaneous events in the surrounding area.</li> <li>Impact on operation and safety of Errol Flynn Boulevard during major events</li> <li>Moore Park Events Operations Group (<b>MPEOG</b>) is consulted during planning of major events.</li> </ul>	<p>During major event days, eight temporary bollards will be installed at the site boundary to restrict usage of the one-way vehicular circulation and parking areas. The loading and parking area will be effectively 'closed off' during these days to vehicles, ensuring there is no potential motorist-pedestrian conflict during periods of increased pedestrian volumes within the surrounding precinct. This will be managed by Swans staff and conducted in collaboration with the MPEOG.</p> <p>It is noted the eight bollards will still allow pedestrian access to the site and adjacent plaza, enabling the activation of the precinct during major events.</p> <p>While the events accommodated within the RHI will be limited in size, there will be no overlap in major events within the RHI, adjacent Hordern Pavilion and Entertainment Quarter to mitigate impacts on the surrounding precinct. The proponent will liaise with MPEOG during the planning for special events on the site. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p>	Traffic and Parking Addendum at <b>Appendix J</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Insufficient assessment of the size of loading vehicles and loading demand generated by the proposal.</li> </ul>	<p>On-site loading arrangements will be undertaken as follows:</p> <ul style="list-style-type: none"> <li>The proponent has advised the largest size vehicle currently undertaking day-to-day general site loading and servicing is a 6.8m Volkswagen Crafter Runner. The site provides one internal loading bay that is of a sufficient size to accommodate this vehicle, and as demonstrated within the Swept Paths appended to the Traffic and Parking Addendum provides suitable circulation for the vehicle to enter the site, access the loading bay and exit in a forward direction onto Errol Flynn Boulevard.</li> </ul> <p>It is further noted the Sydney DCP 2012 parking and loading rates do not apply to the site (as the site is within the Moore Park precinct and there is no applicable DCP). The calculation and assessment of the loading and servicing provision is deemed acceptable as this reflects the occupant's requirements, the localised traffic environment and the land use type. It is therefore considered an appropriate response to the unique nature of the site.</p> <ul style="list-style-type: none"> <li>A Loading Dock Management Plan will be developed to manage the operation of the internal loading dock, ensuring this space can be utilised equitably between the proposed land uses within the site.</li> <li>In exceptional circumstances when loading or servicing must be undertaken utilising a larger MRV vehicle (such as Ausgrid site servicing and waste collection) there is sufficient access and circulation within the internal road network to allow this temporary activity to occur. Swept path</li> </ul>	Traffic and Parking Addendum at <b>Appendix J</b> .

Issue	Summary of Issue	Response	Reference to Information
<u>Safety, Security and Public Health</u>		analysis has been undertaken by GTA demonstrating MRV can enter and exit the site in a forward direction. As there is onsite capacity for 13 vehicles to queue without affecting the operation of Errol Flynn Boulevard, this is considered an appropriate response for these circumstances.	
	<ul style="list-style-type: none"> <li>Swept path analysis should be included.</li> </ul>	<p>Swept path analysis has been appended to the Traffic and Parking Addendum at <b>Appendix J</b>. The swept path analysis demonstrates vehicles up to 6.8m can suitably manoeuvre in and out of the site, including the loading dock, which is sufficient for the 6.8m Volkswagen Crafter Runner utilised by the proponent for typical loading and servicing.</p> <p>In addition to this, the swept path analysis illustrates medium rigid vehicles can enter and exit the site in a forward direction (with no access to the loading bay); sufficient for Ausgrid requirements, commercial waste vehicles and 7-8m minibuses.</p>	Traffic and Parking Addendum at <b>Appendix J</b> .
	<ul style="list-style-type: none"> <li>Liveliness, safety and activation of the precinct at all times of the evening.</li> </ul>	<p>The proposed SSDA has been revised to incorporate external lighting elements within the public domain to ensure public safety and activation. Aurecon have provided an Urban Precinct Lighting Masterplan (<b>Appendix I</b>) for the site and immediate surrounding precinct, noting that the services design of the adjacent plaza and Hordern Pavilion site is subject to the direction of separate consulting groups. The document therefore illustrates the public domain lighting to be implemented within the RHI site, and guidance for design principles for the adjacent sites.</p> <p>Within the subject site, lighting is proposed to be implemented throughout the eastern portion of the site and the central laneway, noting that street lighting provides sufficient lighting for Driver Avenue and Lang Road. The lighting will be comprised of ground-mounted columns, bollards and spikes, in-ground mounted up lights and IP rated flexible LED strips.</p> <p>It is further noted the central plaza DA is being delivered by PlayOn Group, a collaboration between Sydney Swans and Playbill Events. The Sydney Swans therefore have a vested interest and are involved in ensuring the activation of both the site and broader precinct, demonstrating surety of an ongoing commitment to the precinct.</p>	Urban Precinct Lighting Masterplan at <b>Appendix I, Section 5.5</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Hostile vehicle attack and potential event threats.</li> </ul>	In order to mitigate the potential for hostile vehicle attacked and event threats, a number of subtle yet effective design measures are proposed along the eastern portion of the site. These include retention of the predominate tree line adjacent to Errol Flynn Boulevard, inclusion of public domain	<b>Section 6</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
		<p>improvements including furniture and signage, and temporary bollards to be installed during major events.</p> <p>In accordance with this, a suitably worded condition requiring the preparation of a Security Risk Assessment Strategy prior to OC could be imposed.</p>	
	<ul style="list-style-type: none"> <li>Food choices are healthy and avoid an overabundance of fast food restaurants.</li> </ul>	<p>The proposed 188sqm café on the north-eastern corner of the building will be publicly accessible and will provide an opportunity for the local and broader community to interact and connect. As the café will be servicing high-performance sport players, healthy food options will be supplied to support healthy, active lifestyles conducive to the purpose of the site. As the primary lessee, the Sydney Swans will ensure the café as a sub-tenancy operates in accordance with the Sydney Swans ethos for fitness, wholesome food and healthy lifestyles.</p>	
<u>Operation</u>	<ul style="list-style-type: none"> <li>The Moore Park precinct has a broader role than simply a sporting precinct, and the proposal is inconsistent with this broader role.</li> <li>Concern the singular use will diminish the value of the building.</li> </ul>	<p>The Moore Park Master Plan 2040 establishes the role and function of the Moore Park precinct and provides direction for the use and management of the precinct. The Master Plan establishes the vision for the park as follows:</p> <p><i>“Moore Park as a local, national and international sporting and recreation destination. It will actively support the conservation of our natural systems, supporting good health in people and urban ecosystems.”</i></p> <p>The proposal intends to repurpose the current vast exhibition halls of the RHI and its surrounding curtilage into an active, high-functioning mixed-use space that is publicly accessible. Whilst the proposed SSDA will result in a change in how the space is viewed, used and appreciated, the proposal remains consistent with the guidelines for the precinct as identified above and will ensure the site is consistently maintained and occupied, increasing the appreciation of the heritage and architectural value of the building. In its current state, the RHI is currently underutilised having been only occupied for 93 days in 2019. The proposed development will ensure the building is consistently maintained, allowing public access for a minimum of 260 days per year and ensuring the ongoing appreciation of the building.</p> <p>The unique mixed nature of the SSDA allows the site to perform a number of complementary roles, including sporting, recreation, administrative, entertainment and public use. This is consistent with</p>	

Issue	Summary of Issue	Response	Reference to Information
		the historical use of the robust building to accommodate a number of varying uses, including a venue for the Royal Easter Show, dance hall, ice-skating rink, roller skating venue and emergency hospital. The proposed multi-use facility will contribute to the site's colourful history and suit the wider community needs in the context of the Swans training facility.	
	<ul style="list-style-type: none"> <li>Impact of the proposal on Mardi Gras, Sydney Running Festival and the World Pride Games 2023, and the consequential demise of the Mardi Gras parade and cultural festival.</li> <li>Loss of community hall, music venue and events space, and the lack of other appropriate venues in the eastern suburbs.</li> <li>Details of alternative venues is required if existing users cannot be accommodated.</li> </ul>	<p>The proponent has demonstrated a commitment to making the RHI internal multipurpose space available for community uses. The venue will cater for a range of events supporting community, school and charity groups as well as local, national and international corporate partners, such as the Mardi Gras. Whilst the SSDA proposes a change and evolution to the site and its operation, the site will remain available for community uses.</p> <p>The availability of the RHI to accommodate the Mardi Gras festival was communicated to the public within a media release by Mardi Gras, ensuring the public is aware of the support for this event as discussed in Section 2 of this RTS and PPR. The Sydney Swans have maintained a positive relationship with the Mardi Gras and will continue to do so in the future, as illustrated in the previous and ongoing consultation between the Sydney Swans and Mardi Gras (<b>Section 2</b>) and the public media release by the Mardi Gras indicating support for the proposal (<b>Appendix U</b>).</p> <p>The internal works to the RHI have been designed in a flexible manner to ensure the adaptability of the building to accommodate a range of event purposes and uses. As outlined in the Draft Event and Operational Management Plan (<b>Appendix P</b>), the Sydney Swans Event Management Team is a dedicated internal group responsible for safe and efficient event planning, who will work with temporary tenants to ensure the use of the site in an appropriate manner. Whilst the multi-purpose area has been designed in a flexible and robust manner to allow for convenient use, should additional infrastructure be required bump-in and bump-out measures will be accommodated. The location of the internal toilets is also conducive to hosting large-scale events and are located adjacent to the multi-purpose space to ensure the private office areas are not publicly accessible during these events.</p> <p>Consistent with existing practice, if interested parties deem the events space no longer appropriate for the specific event requirements alternative venues are available for hire in the Sydney LGA. This includes the International Convention Centre; a convention, exhibition and entertainment venue located in Darling Harbour, the Australian Technology Park; a similar industrial-style venue</p>	Draft Event and Operational Management Plan at <b>Appendix P</b> and <b>Section 6</b> of this RTS and PPR.

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		with capacity for 2080 seated guests located in Eveleigh, and the Hordern Pavilion; located adjacent to the site with capacity for pre and post event overflow.	
	<ul style="list-style-type: none"> <li>Clarification required of the areas accessible to the public, capacity of these areas, when this is open to the public and how this is managed.</li> </ul>	<p>A Draft Event and Operational Management Plan has been prepared by the Sydney Swans and is submitted at <b>Appendix P</b>. The Plan provides additional information in response to the queries raised regarding the operational management and public access to the site. In summary, the proposed SSDA will have the following operational details:</p> <ul style="list-style-type: none"> <li>A breakdown of the uses of the site, details of public access to these uses and additional notes on management of these spaces. This provides sufficient detail for the varying circumstances available at the site, including on Sydney Swans match game days, on typical weekday and weekends, and during major events accommodated within the site such as Mardi Gras.</li> <li>The maximum number of persons (including staff) permitted on the premises at any one time is 1000 patrons. A digital registration system will be set in place prior to large scale events to ensure this patronage capacity is not exceeded.</li> <li>The facility will operate the following hours of operation: <ul style="list-style-type: none"> <li>Office hours: Monday – Friday, 7am – 5pm</li> <li>Event spaces: Operational and event-dependent, however likely to extend from 5pm-9pm. Dependent on event format and operation, these events may extend until 12pm.</li> <li>Bump in and bump out: Event dependent, to be coordinated with CPMPT and MPEOG.</li> </ul> </li> <li>Event management will be facilitated by the Sydney Swans Match Day and Events Team, which comprises of six full time members and is supplemented by additional Sydney Swans department team members, with the option of engaging additional casual staff via a labour hire business partner when required.</li> </ul> <p>Clarity on the public access to the facility and the public benefits of the proposal is further reiterated in the letter prepared by Tom Harley and submitted to the City of Sydney (<b>Appendix T</b>) and the public benefits brochure to ensure the public are aware of the offerings provided within the site (<b>Appendix S</b>).</p>	A Draft Event and Operational Management Plan at <b>Appendix P</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Clarification required of measures proposed to accommodate and</li> </ul>	The delivery of community partnership tenancies is a key aspect of the proposed SSD, and include as follows:	



Issue	Summary of Issue	Response	Reference to Information
	<p>retain public tenancies and programs as part of the public benefit offer.</p> <ul style="list-style-type: none"> <li>• Certainty that these community tenancies will be publicly accessible during the entirety of the lease is requested.</li> </ul>	<ul style="list-style-type: none"> <li>• Blood Bank tenancy (61sqm) on the ground floor, with a direct independent entrance to the eastern public domain.</li> <li>• Go Foundation (58sqm) on Level 1, including an independent office space and meeting room.</li> <li>• Clontarf Foundation (46sqm) on Level 1 including fixed and flexible office furniture.</li> </ul> <p>In addition to these community leases, the proposal incorporates a medical tenancy on level 1 and a café area adjacent to the plaza. The Sydney Swans are committed to maintaining these physical tenancies to accommodate like uses, whilst also recognising the individual tenure requirements of each organisation.</p> <p>A suitably worded condition to reinforce the maintenance of the tenancies could be imposed if considered appropriate.</p>	
	<ul style="list-style-type: none"> <li>• Clarification of the lease arrangements requested.</li> </ul>	<p>Due to commercial sensitivities, exact leasing arrangements cannot be divulged to the public. Rather, the following provides an overview of the relationship between the Sydney Swans and the CPMPT.</p> <ul style="list-style-type: none"> <li>• Following a competitive government tender process, the Sydney Swans secured a 27-year lease through the CPMPT for the use of the site. The lease commenced in May 2019 and will conclude in 2046.</li> <li>• The CPMPT are the landholders of the site and have been engaged throughout the tender, design development and SSDA assessment processes, and will continue to remain involved through construction and operation.</li> <li>• PlayOn Group is a joint venture between the Sydney Swans and Playbill Venue and is responsible for the delivery of the Central Plaza.</li> <li>• During the 27-year leasehold, the Sydney Swans are able to further hire the multi-purpose space to ensure the broader community can access and benefit from the site. As previously outlined, the multipurpose space will be available for community uses such as Mardi Gras.</li> </ul>	A Draft Event and Operational Management Plan at <b>Appendix P</b> .
<u>Construction</u>	<ul style="list-style-type: none"> <li>• Impact of construction on the structural integrity of natural and built features of the RHI, heritage walls, road network, trees, structures, footpaths and lighting.</li> </ul>	<p>Prior to commencing demolition or excavation works on-site a dilapidation survey of surrounding structures within a 100 m radius of the site will be carried out. The dilapidation survey is to be prepared by a qualified structural engineer with a report prepared that includes accompanying photographs and where relevant descriptions and measurements of significant defects.</p>	Revised Environmental Construction

Issue	Summary of Issue	Response	Reference to Information
		<p>At the completion of building works a second dilapidation survey will be completed by a qualified structural engineer. The second report will include any damage to buildings, structures, infrastructure (e.g. pavements and lighting) or vegetation (e.g. lawns, gardens and trees), that will be rectified.</p> <p>A suitably worded condition requiring the preparation of a photographic Dilapidation Report and make-good provision in the event of damage could be imposed to reinforce this requirement if considered appropriate.</p>	Management Plan at <b>Appendix N</b> .
	<ul style="list-style-type: none"> <li>Air quality will be adversely affected during construction. Ongoing monitoring is recommended.</li> </ul>	Air quality monitoring by appropriately qualified professional will be carried out to safeguard the health of contractors, occupants, visitors and surrounding residents. Air quality will be carried out with regular reference to the nearest collection site for air quality index. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.	Revised Environmental Construction Management Plan at <b>Appendix N</b> and <b>Section 6</b> of this RTS and PPR.
	<ul style="list-style-type: none"> <li>Construction of the proposal will conflict with the Sydney Football Stadium and Sydney Light Rail project.</li> </ul>	The CMP prepared by FDC demonstrates a commitment to ongoing and regular communication with adjacent contractors to coordinate construction programs, and implementation of relevant management plans to mitigate construction impact. The CSELR will be completed prior to construction commencing onsite, and the primary construction access point to the site is provided on Errol Flynn Boulevard on the eastern portion of the site.	Construction Management Plan at <b>Appendix O</b> .
	<ul style="list-style-type: none"> <li>Safety of pedestrians and cyclists are threatened due to construction activities.</li> </ul>	A Construction Pedestrian and Traffic Management Plan will be prepared prior to receipt of CC and implemented during construction. This will be prepared on behalf of and with relevant input from FDC, the Head Contractor, to ensure a consistency in approach throughout construction. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.	Construction Management Plan at <b>Appendix O</b> .
	<ul style="list-style-type: none"> <li>Operation of events and businesses in the surrounding area will be impacted by the noise and vibration generated by construction works.</li> </ul>	The Noise and Vibration Impact Assessment prepared by GHD and submitted within the June SSDA submission detailed the results of noise modelling of the expected construction noise level undertaken using Sound Plan software. The results indicated there will be no exceedances of the	Construction Management Plan at <b>Appendix O</b> .

Issue	Summary of Issue	Response	Reference to Information
		<p>noise management levels of the Interim Construction Noise Guidelines and Road Noise Policy for residential or non-residential receivers.</p> <p>In addition to the above, a Construction Management Plan (<b>CMP</b>) prepared by the engaged contractor, FDC, is provided at <b>Appendix O</b>. The CMP outlines additional measures to reduce the noise generated by construction activities, including:</p> <ul style="list-style-type: none"> <li>• Clear and concise Site Rules displayed throughout the site to cover behavioural practices such as “no dropping of heavy materials from heights”</li> <li>• Careful consideration and thorough equipment selection to minimise noise and vibration</li> <li>• Regular maintenance of all plant and equipment to ensure optimum running conditions</li> <li>• Installation of Acoustic barriers or screens in areas to reduce the impact to the stakeholders of the development for site specific tasks such as Cutting stone and aluminium.</li> <li>• Installation of Silencing devices fitted to exhausts</li> <li>• The Site Manager will be responsible for scheduling activities that generate high noise levels to short term durations wherever possible and to times of the day which would be least intrusive.</li> <li>• The contractor will comply with the agreed vibration criteria to be nominated in the SSDA conditions including the observance of the Exceedance Notifications for both the Impulsive Vibration Limits and the Continuous Vibration Limits set for the development.</li> <li>• All noisy works will be completed in accordance with the DA construction hours conditions.</li> </ul> <p>These measures, and those proposed in the Noise and Vibration Impact Assessment, will be implemented to ensure an appropriate acoustic environment is maintained.</p>	
	<ul style="list-style-type: none"> <li>• The operation of Driver Avenue as a pedestrian space and key access corridor will be impacted by the construction of the proposal, including impacts on footpath and road closures and loss of parking.</li> </ul>	<p>As outlined in the CMP, the primary access to the site will be provided from Errol Flynn Boulevard. This entrance point will service all deliveries, loading and collection to reduce impact on Driver Avenue.</p> <p>In the event of an overlap between the scope of works at Errol Flynn Boulevard and construction deliveries, a secondary access point will be utilised as a temporary solution. As outlined in the Construction Management Plan at <b>Appendix O</b>, it is proposed to utilise the existing vehicular crossover on Driver Avenue. There are no other possible entries due to existing façade lines and</p>	Construction Management Plan at <b>Appendix O</b> and <b>Section 6</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
		<p>landscaping. This point will only be utilised in extreme circumstances when the primary access point is constrained due to construction works.</p> <p>No construction vehicle marshalling or holding will occur on Driver Avenue. For works undertaken on Driver Avenue that impact traffic or pedestrian flow, permits will be sought from the CPMPT. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p>	
<u>Public Benefits</u>	<ul style="list-style-type: none"> <li>The proposal does not involve development that can be excluded from the need to pay a contribution under Section 1.3 of the City of Sydney Contributions Plan.</li> </ul>	Noted. The proponent has revised their position on the payment of Section 7.11 contributions and concedes to the payment of a suitable contribution, with a revised calculation provided in Section 4.2 of this RTS and PPR.	Section 4.2 of this RTS and PPR.
<u>Ecologically Sustainable Development (ESD)</u>	<ul style="list-style-type: none"> <li>Ensuring the RHI and NSB demonstrates excellence in sustainability.</li> </ul>	<p>A revised ESD Report has been prepared by Aurecon and is submitted at <b>Appendix K</b>. The SSDA proposal has been revised to target a 5-Star Green Star Design &amp; As Built rating administered by the Green Building Council of Australia. This targeting reinforces the commitment of the proponent to achieve environmental excellence and demonstrate best practice, particularly noting that few heritage and sporting facilities have previously achieved this rating. As the Green Star tool encapsulates both design and construction initiatives, the formal assessment and rating will take place post-practical completion. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p> <p>The design of the proposal will seek to promote efficiency and minimise operational energy and will utilise the NABERS tool as a comparative benchmark to inform design (noting that the proposal cannot obtain a formal rating due to the unique nature of the multi-use proposal). The required energy efficiency for each star bracket will inform an assessment of operational consumption of the development line with best practice.</p> <p>Further to the above, a partnership with Closed Loop Recycling is currently in negotiations to develop a leading resource management program that ensures all materials that have finished their useful life expectancy are captured, upcycled into new products and reinvested into the facility. The program will be implemented during operation of the facility. The program will also provide accurate data of the environmental and economic benefits of the scheme, able to be showcased</p>	Revised ESD Report at <b>Appendix K</b> and <b>Section 6</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
		and incentivise others to initiate similar waste-management programs. The initiative demonstrates a tangible commitment to showcasing environmental excellence within the facility.	
	<ul style="list-style-type: none"> <li>The ESD report does not demonstrate the measure of renewable energy generated by solar panels</li> <li>The ESD report does not consider the sustainability provisions of relevant State Government strategies.</li> </ul>	<p>The ESD Report has been revised to incorporate the further discussion of the solar photovoltaic panels. As demonstrated on the revised Architectural Plans at <b>Appendix A</b>, 240 panels are proposed to be located exclusively on the NSB roof space, due to the structural limitations and adverse heritage impact that would arise from installation on the RHI roof space. The installation of these 240 panels could produce up to 82,090kWh of electricity per year, contributing to 5-7% of the building's annual energy needs.</p> <p>The ESD Report has been revised to consider the sustainability provisions of the <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>, the <i>Eastern City District Plan</i> and the NSW Government's 'Net Zero Emissions by 2050' target. As outlined within the Report, the proposal will contribute to the achievement of the sustainability targets and principles identified within these State Government strategies through best practice façade and lighting performance, optimisation of natural lighting opportunities, adoption of a high performance HVCA design, installation of an electrical and water metering strategy for both buildings, installation of solar photovoltaic panels and use of water-efficient fixtures.</p>	Revised Architectural Plans at <b>Appendix A</b> and Revised ESD Report at <b>Appendix K</b> .
	<ul style="list-style-type: none"> <li>The proposal utilises gas hot water systems, which has a high energy usage.</li> </ul>	Following lodgement of the SSDA package, Aurecon conducted extensive feasibility analysis of the installation and use of solar and electricity hot water systems as an alternative to gas systems. However, due to the high hot water demands of the proposal (associated with the pool, spa and sauna use) and the spatial constraints of Level 1, a gas system was considered the most appropriate option for the proposal. Notwithstanding this, the proposal continues to demonstrate best practice in environmental sustainability through the aspiration of a 5-Star Green Star rating and use of 4 and 5-Star WELS rated water fittings and fixtures such as taps, urinals, toilets and dishwashers.	Revised ESD Report at <b>Appendix K</b> .
	<ul style="list-style-type: none"> <li>The proposal is unable to utilise the transition period of the National Construction Code (NCC) Section J 2016 and should be assessed under the Section J 2019 provisions.</li> </ul>	<p>Mckenzie Group Consulting has provided consultant advice on the transitional period of the Section J regulations, provided at Appendix M.</p> <p>The NCC 2019 contains provisions for a 12-month transition period until 30 April 2020 for the energy efficiency provisions contained within Section J. During this time, provisions of either NCC</p>	NCC Consultant Advice at <b>Appendix M</b> and Revised ESD

Issue	Summary of Issue	Response	Reference to Information
		<p>2019 or NCC 2016 can be adopted. In accordance with clause 98(3) of the EP&amp;A Regulations, the applicable BCA year is the BCA in force at the time of the Construction Certificate application. Therefore, a CC can be applied for under BCA 2019 until April 2020 and the SSDA can legally utilise the NCC 2016 Section J provisions.</p> <p>Notwithstanding this, the proposal continues to demonstrate best practice sustainability through aspirations of a 5-Star Green Star target, as discussed in the revised ESD Report at <b>Appendix L</b>.</p>	Report at <b>Appendix L</b> .
<u>Waste Management</u>	<ul style="list-style-type: none"> <li>Waste Management Plan (<b>WMP</b>) is insufficient and does not identify the path of access for all users</li> </ul>	<p>The Waste Management Plan has been revised to incorporate relevant project amendments and address all matters raised during the submission period. The revised waste storage area is located within a convenient location adjacent to both buildings. Cleaning contractors will transfer generated waste from the buildings to the waste storage area via the most direct path of travel from the building in which they exited from. In transferring general waste, recycling material and food waste all material will be transported in accordance with the relevant Work Health and Safety Requirements.</p>	Revised Waste Management Plan prepared by Dickens Solutions at <b>Appendix K</b> .
	<ul style="list-style-type: none"> <li>Waste generation calculations are inaccurate and have not been prepared in accordance with the provisions of the City's Guidelines for Waste Management in New Developments.</li> </ul>	<p>The Revised Waste Management Plan has been reviewed to incorporate the waste and recycling generation rates identified within the City of Sydney Guidelines for Waste Management in New Development. Based on the adoption of these rates, the facility will generate 11,795L of general waste per week, 18,424L of recycling waste per week and 5,551L of food waste per week.</p> <p>This waste will be stored within the 12.6sqm waste storage area and collected 6 days per week (for recycling), 4 days per week (for general waste) and 3 days per week (for food waste).</p>	Revised Waste Management Plan prepared by Dickens Solutions at <b>Appendix K</b> .
	<ul style="list-style-type: none"> <li>Dedicated area for separate waste streams is not identified.</li> </ul>	<p>The Revised Architectural Plan set includes the design and location of the new waste storage area, adjacent to the southern elevation of the RHI within the central laneway. As illustrated in the plan set, the waste storage area incorporates eight x1,100L waste receptacles for appropriate storage of general waste, recycling and food waste associated with the facility.</p> <p>During day to day operation of the facility, the occupants are not expected to generate significant bulky waste. Notwithstanding this, the storage facilities provided on the ground floor of the RHI adjacent to the internal loading bay can be utilised for the temporary storage of bulky waste, prior to</p>	Revised Waste Management Plan prepared by Dickens Solutions at <b>Appendix K</b> .

Issue	Summary of Issue	Response	Reference to Information
		<p>removal and disposal in accordance with the Waste Management Operational Procedure developed for the site. This plan will be developed prior to the issue of an Occupation Certificate.</p> <p>Medical waste generated in association with the medical tenancy, Blood Bank and any waste generated from sports injuries will be stored and disposed of separately to general waste requirements, in accordance with the <i>Protection of the Environment Operations Act 1997</i> and <i>NSW Health Clinical and Related Waste Management for Health Services 2017</i>. Waste will be stored within identified receptacles within the medical tenancy and Blood Bank, transported from the respective storage areas and disposed of at an appropriate licensed waste management facility by an appropriately licensed waste contractor. A contractor responsible for the management of medical waste will be appointed prior to the issue of an Occupation Certificate.</p>	
	<ul style="list-style-type: none"> <li>Clarification required of waste collection arrangements.</li> </ul>	<p>Waste collection will be undertaken by a private waste contractor utilising a medium rigid vehicle (MRV). As demonstrated in the revised Traffic and Parking Addendum, there is sufficient circulation on site to accommodate this vehicle and its entry and exit in a forward direction. Collection will occur via the internal road network, adjacent to the laneway entry with the MRV temporarily parked parallel to the RHI eastern elevation. Notwithstanding this temporary park, this will not disrupt use of the internal road network as vehicles can suitably pass the MRV within the 3.1m clearance distance and access the parking spaces and site egress.</p> <p>Waste collection will occur between 4am and 7am on each collection day, a period of reduced traffic and occupancy levels to minimise any disruption to the site.</p> <p>Bins will be wheeled along the at-grade service from the waste storage area to the collection vehicle, and following collection returned to the storage area. This process ensures the most efficient storage and collection of waste with minimal impact on the surrounding area.</p> <p>In the event bulky waste storage is generated by the proposal, this waste will be collected by a private contractor when necessary.</p>	Revised Waste Management Plan prepared by Dickens Solutions at <b>Appendix K</b> .
	<ul style="list-style-type: none"> <li>Waste collection for commercial tenancies will be insufficient.</li> </ul>	<p>Any commercial tenants will have a commercial waste contract in place prior to commencement of business trading. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p>	Revised Waste Management Plan prepared by



Issue	Summary of Issue	Response	Reference to Information
<u>Hydrology</u>	<ul style="list-style-type: none"> <li>Waste collection for major events will be insufficient.</li> </ul>	Depending on the nature of the event and the expected numbers of persons attending, additional waste and recycling receptacles may be required, and separate arrangements for the transportation and disposal or processing of waste and recycling material will be required. As outlined in the Draft Event and Operational Management Plan ( <b>Appendix O</b> ) this will be managed by the Sydney Swans Events Team and the appointed waste contractor, with tenders finalised during the construction phase. The appointment of a relevant contractor and finalisation of the arrangements will be in place prior to the issue of an Occupation Certificate.	Dickens Solutions at <b>Appendix K</b> .
	<ul style="list-style-type: none"> <li>A MUSIC-Link model is required to demonstrate compliance with water quality requirements.</li> <li>The south-western corner of the site is subject to flooding and adequate measures are required to ensure the safety of workers, users and visitors.</li> </ul>	<p>A MUSIC-Link model is provided on a separate USB. The results of the model indicate the redeveloped site provides water quality benefit when compared to the existing site as follows:</p> <ul style="list-style-type: none"> <li>Total suspended solids – 94.2% load reduction.</li> <li>Total phosphorous – 79.4% load reduction.</li> <li>Total nitrogen – 56.6% load reduction.</li> <li>Gross pollutants – 100% load reduction.</li> </ul> <p>Refer to further discussion of the MUSIC-Link model results in the Soil and Water Management Plan prepared by TTW and submitted within the SSDA lodgement package.</p>	Revised Waste Management Plan prepared by Dickens Solutions at <b>Appendix K</b> and Draft Event and Operational Management Plan at <b>Appendix O</b> .
	<ul style="list-style-type: none"> <li>A MUSIC-Link model is required to demonstrate compliance with water quality requirements.</li> <li>The south-western corner of the site is subject to flooding and adequate measures are required to ensure the safety of workers, users and visitors.</li> </ul>	<p>A MUSIC-Link model is provided on a separate USB. The results of the model indicate the redeveloped site provides water quality benefit when compared to the existing site as follows:</p> <ul style="list-style-type: none"> <li>Total suspended solids – 94.2% load reduction.</li> <li>Total phosphorous – 79.4% load reduction.</li> <li>Total nitrogen – 56.6% load reduction.</li> <li>Gross pollutants – 100% load reduction.</li> </ul> <p>Refer to further discussion of the MUSIC-Link model results in the Soil and Water Management Plan prepared by TTW and submitted within the SSDA lodgement package.</p>	Soil and Water Management Plan prepared by TTW and submitted within the SSDA package.
<u>Services and Utilities</u>	<ul style="list-style-type: none"> <li>Approval required for licensed water entitlement should groundwater be intercepted during excavation.</li> </ul>	The Environmental Construction Management Plan (ECMP) prepared by Douglas Partners outlines the management process for groundwater seepage, including the receipt of approval from the relevant authority for off-site disposal. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.	Environmental Construction Management Plan at <b>Appendix N</b> .
	<ul style="list-style-type: none"> <li>Approval required from Sydney Water in regard to use of Sydney Water Tap In service and Section 73 Compliance Certificate.</li> </ul>	MGP are the appointed Sydney Water Coordinator for the SSDA and have commenced negotiations with Sydney Water to apply and obtain the Section 73 Compliance Certificate for the	<b>Section 6</b> of this RTS and PPR.

Issue	Summary of Issue	Response	Reference to Information
		development. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.	
<a href="#"><u>Site Boundaries</u></a>	<ul style="list-style-type: none"> <li>Clarification required of the extent of the site.</li> </ul>	As outlined in the EIS, the proposed application relates to the Royal Hall of Industries building, the associated courtyard area to the immediate south of the building and the eastern forecourt. The site boundary is illustrated in the revised Architectural Plan set provided at <b>Appendix A</b> .	Revised Architectural Plan set provided at <b>Appendix A</b> .

## 4. AMENDMENTS TO THE APPLICATION

Whilst there is no proposed change to the overall project description, a number of detailed design changes have occurred since the submission of the EIS and are proposed in the PPR in accordance with Section 55 of the EP&A Regulations.

The amendments to the application are in response to the matters raised by the Department and other government agencies and in public submissions and are illustrated in the updated Architectural Plans prepared by Populous (**Appendix A**) and the Landscape Plans prepared by Arcadia (**Appendix C**). These design changes are described in Table 3 and, where relevant, assessed in Section 5 of this RTS and PPR accompanying technical assessments.

Table 4 – Key amendments to the application

Key Change	Description																										
GFA Calculation	<p>A revised calculation of the GFA of the proposal has demonstrated minor inconsistencies with the proposed GFA calculation due to incorrect calculations of slab areas. The Preferred Project has a total GFA of 10,636.5sqm. This represents a minor increase of 48.5sqm from the June SSDA lodgement of 10,588sqm.</p> <p>This nominal increase in GFA represents no impediment to the proposal's compliance with relevant environmental planning instruments.</p> <p>Additional detail is provided within the GFA breakdown in the below table. The calculations have been prepared in accordance with the GFA. The basement storage and services area, and Level 1 mezzanine plant are excluded from the GFA calculations in accordance with the definition of <i>gross floor area</i> within the Standard Instrument LEP.</p> <table> <tr> <th>Proposed Use</th><th>GFA</th></tr> <tr> <td>Office and administration spaces</td><td>3647sqm</td></tr> <tr> <td>Medical tenancy</td><td>414sqm</td></tr> <tr> <td>Food and drink premises</td><td>155sqm</td></tr> <tr> <td>Foundation tenancies</td><td>170sqm</td></tr> <tr> <td>Child minding care</td><td>96sqm</td></tr> <tr> <td>Central multipurpose field</td><td>1807sqm</td></tr> <tr> <td>Central netball court</td><td>851sqm</td></tr> <tr> <td>Wet areas</td><td>594sqm</td></tr> <tr> <td>Gymnasium</td><td>1318sqm</td></tr> <tr> <td>Loading and services</td><td>151.5sqm</td></tr> <tr> <td>Front of house and circulation</td><td>1433sqm</td></tr> <tr> <td><b>TOTAL</b></td><td><b>10,636.5sqm</b></td></tr> </table>	Proposed Use	GFA	Office and administration spaces	3647sqm	Medical tenancy	414sqm	Food and drink premises	155sqm	Foundation tenancies	170sqm	Child minding care	96sqm	Central multipurpose field	1807sqm	Central netball court	851sqm	Wet areas	594sqm	Gymnasium	1318sqm	Loading and services	151.5sqm	Front of house and circulation	1433sqm	<b>TOTAL</b>	<b>10,636.5sqm</b>
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Loading and services	151.5sqm																										
Front of house and circulation	1433sqm																										
<b>TOTAL</b>	<b>10,636.5sqm</b>																										
Internal Layouts	During the design development phase, minor internal layout changes have occurred in order to improve the functionality and efficiency of the internal space, including:																										

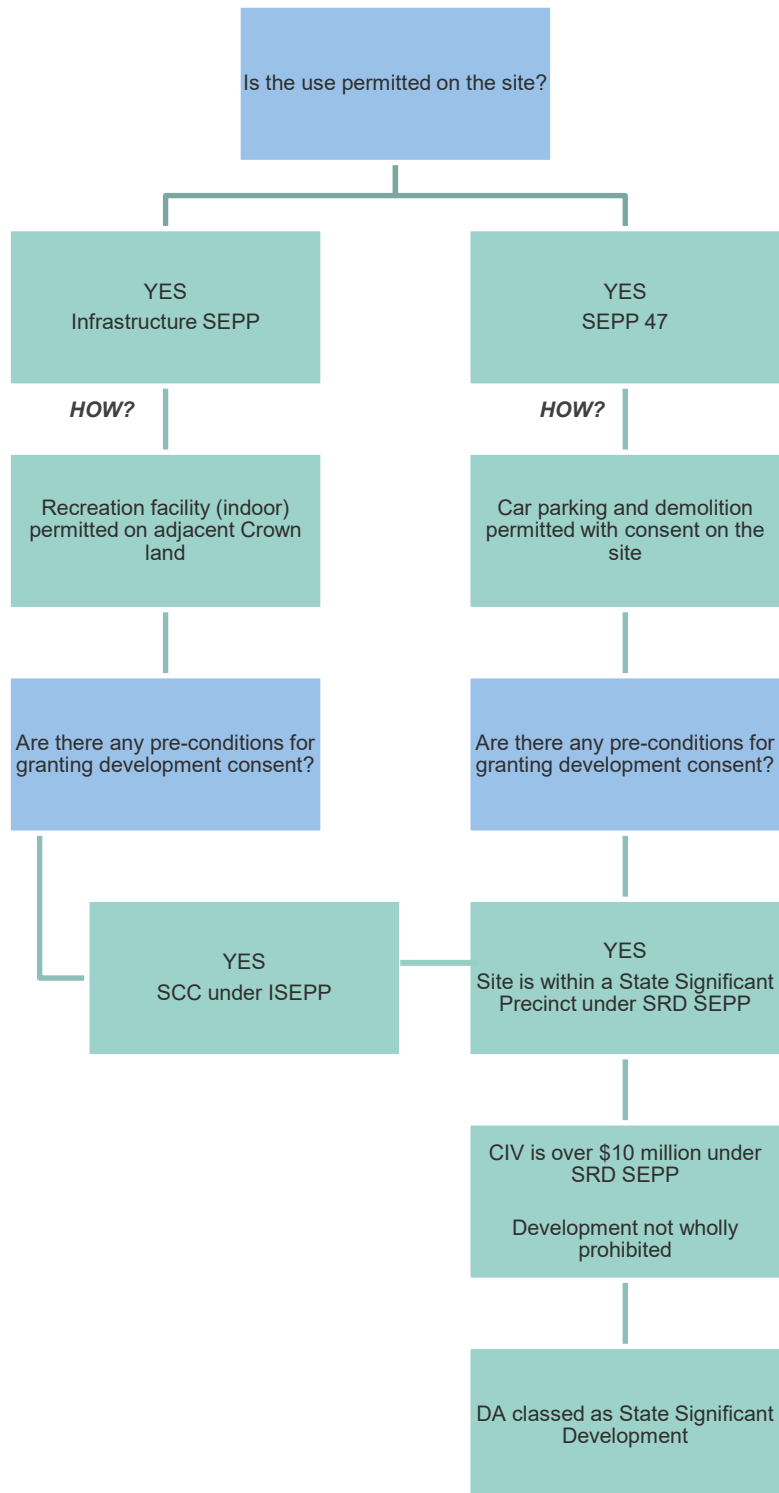
Key Change	Description
	<ul style="list-style-type: none"> <li>• A historical museum and memorabilia area (139sqm) adjacent to the foyer entry.</li> <li>• Revised relocation of the Blood Bank tenancy to make more efficient use of space.</li> <li>• Minor redesign of the auditorium and non-binary/ unisex change room on Ground Floor to improve efficiencies.</li> <li>• Relocation of AFL female change room to Level 1 for additional privacy and to provide equitable facilities for both male and female players.</li> <li>• Internal re-design of the Level 1 medical tenancy to facilitate relocation of Clontarf Foundation and reception area.</li> <li>• Additional meeting space adjacent to the multi-purpose field.</li> </ul> <p>The internal layout changes as described above do not materially change the project description, proposed usage of the site or site capacity. Refer to Revised Architectural Plans at <b>Appendix A</b>.</p>
Landscaping and Tree Removal	<p>An increase in site landscaping is proposed within the Preferred Project in order to improve the amenity of the site and increase green coverage in response to City of Sydney and DPIE submissions. Key amendments include:</p> <ul style="list-style-type: none"> <li>• The number of trees to be removed has been reduced from the removal of 7 trees in the June SSDA lodgement to the removal of four trees in this PPR. These three additional trees have been retained through re-design of the eastern public domain.</li> <li>• Landscaping planter boxes proposed adjacent to the eastern and southern elevation of the RHI building has been removed from the PPR in order to respect the heritage masonry and fabric.</li> <li>• The number of proposed trees has been increased from 16 trees in the June SSDA lodgement to 26 trees in this PPR. This representing a planting ratio of 6.5 trees for every one tree removed.</li> <li>• Tree species has also been reconsidered in order to incorporate native planting species with Indigenous significance, selected in collaboration with the Indigenous consultant engaged on the project, GHD.</li> <li>• Two trees planted adjacent to the southern boundary of the site on Lang Road will require pruning in order to allow the construction of the NSB.</li> <li>• An increase in the height and number of shrubs adjacent to the external fire services annex and kiosk to provide effective landscaped screening to these areas. The easement surrounding the kiosk prevents physical screening onto these structures, however the proposed shrubs which grow to 2-3m in maturity will provide effective coverage for these areas.</li> </ul> <p>Further information and assessment is provided within Section 5.6 and illustrated in the revised Public Domain and Landscaping Plans at <b>Appendix C</b> and Addendum Arborist Report at <b>Appendix F</b>.</p>
Lighting	<p>Lighting has been incorporated into the Preferred Project in order to celebrate the architectural significance of the RHI and to improve passive lighting within the adjacent public domain. A Lighting Plan prepared by Aurecon is submitted at <b>Appendix I</b>, detailing the following additions:</p> <ul style="list-style-type: none"> <li>• Public domain lighting is proposed in the eastern public domain and central landscaped laneway between the NSB and RHI. A mixed use of post-top luminaries, bollard luminaries, in-ground mounted up-light, adjustable spotlight and IP rated</li> </ul>

Key Change	Description
	<p>flexible LED strips will improve public safety, showcase site landscaping and support wayfinding.</p> <ul style="list-style-type: none"> <li>In-ground up-lights, sill lights and linear LEDs are proposed for the façade lighting design. These lights are interspersed across the facades adjacent to the five primary arches and turrets.</li> </ul> <p>The detailed placement of lighting to be agreed with the CPMPT prior to issue of the Construction Certificate.</p>
Waste Management	<p>In response to commentary received from the CPMPT and City of Sydney, the location of the waste storage area has been relocated to 'de-clutter' the public domain along the eastern portion of the site and improve key sightlines from the south-east of the site towards the RHI. The revised location of the waste storage area is adjacent to the southern elevation of the RHI, within the central laneway intersecting the site. The waste will sit within a structure 1.5m in width, 10.5m in length and 1.7m in height. The structure will be enclosed with a simple perforated metal with additional screening from landscaping in the adjacent laneway.</p> <p>The structure has been assessed in terms of its heritage, waste management and architectural impact, and has been demonstrated to be a suitable response to the site constraints and operational requirements. Refer to further discussion in <b>Section 5</b> of this RTS and PPR.</p>
Car Parking	<p>The Preferred Project includes a revision to the car parking area along the site's eastern boundary. The proposed car parking spaces has reduced from 11 spaces to eight spaces in order to accommodate an accessible parking space and sufficient circulation for vehicular access to the site.</p> <p>In addition to the reduction in car parking spaces, temporary bollards are proposed to restrict access to the site during major events days. This includes the use of three bollards on the northern vehicular crossover and five bollards on the southern vehicular crossover.</p> <p>Refer to Revised Public Domain and Landscaping Plans at Section <b>Appendix C</b> and further discussion in <b>Section 5.6</b> of this RTS and PPR.</p>
Bicycle Parking	<p>The Preferred Project includes a minor relocation of the proposed visitor bicycle parking to improve public usage and safety. The consolidated bay of four bicycle parks adjacent to the Swans staff and players entrance has been removed, with these spaces relocated to be interspersed along the eastern frontage and one additional space within the northern consolidated bicycle rack. There will be no reduction in spaces associated with this relocation, with 32 spaces provided within the public domain.</p>
Pedestrian Access	<p>In order to refine the design of the public domain on the eastern boundary of the site, the public entrance footpath providing direct access from Errol Flynn Boulevard to the players entry has been removed. The removal of the path presents a safer outcome, as pedestrians will no longer be required to traverse through the vehicular access and car parking area, instead utilising the primary pedestrian paths adjacent to the NSB entry.</p>

## 5. JUSTIFICATION AND ADDITIONAL INFORMATION

### 5.1. PERMISSIBILITY

The permissibility of the scheme relies upon Clause 18 of the ISEPP and Clause 11 of SEPP 47. These two instruments offer two independent approval pathways that can be utilised to demonstrate the permissibility of the SSDA on the site, as illustrated in the below flowchart.



### 5.1.1. Permissibility under ISEPP 2007

Clause 18 of the ISEPP 2007 permits additional uses on State land where the use is permissible on an adjacent landholding. The land adjacent to the site to the immediate west and south of the site is zoned RE1 Public Recreation under the *Sydney Local Environmental Plan 2012*. In the RE1 zone, *recreation facilities (indoor)* are permitted with consent. Clause 18 of the ISEPP is therefore enacted to apply the permissibility of this use to the subject site and enable the scheme to progress.

However, a review of the statutory framework guiding development on the site and input from relevant agencies (refer Section 2) indicated that in order to enact this clause a valid Site Compatibility Certificate is required as follows:

*(3) Development on land for a purpose that is permitted with consent by the zoning of that land may be carried out with consent on adjacent land, despite any local environmental plan applying to that adjacent land, if:*

*(a) there is a valid site compatibility certificate applying to the development, and*

*(b) the adjacent land was prescribed State land when the Secretary issued the certificate.*

As such, the proponent has progressed preparation of a Site Compatibility Certificate guided by the relevant considerations identified within Clause 19(6) of the ISEPP. Advice received from the DPIE confirmed the assessment and determination of the SCC can occur concurrently to the assessment and determination of the SSDA.

### 5.1.2. Permissibility under SEPP 47

Pursuant to Clause 2 of SEPP 47, the provisions of the SEPP apply to land outlined in the Moore Park Showground Amendment No 1 map. The subject site is both within the map boundaries and is largely contained within a sub-precinct which is “vertically hatched” on the map.

The SSDA proposes a number of land uses and development works as outlined within the EIS, including recreation facility (indoor), office premises, public events, health services facility, food and drink premises, car parking and demolition works.

*Car and coach parking* and *demolition* are specifically identified within SEPP 47 as development permissible with consent on land shown as “vertically hatched”. These land uses are sought as part of the SSDA.

Clause 4.38 of the EP&A Act 1979 affords to the Minister the power to grant consent to state significant development that is not “wholly prohibited” by a relevant environmental planning instrument, including the absence of permissibility. As car parking and demolition is sought within the SSDA, the proposed development is not “wholly prohibited”, and as such the Minister can grant development consent.

### 5.1.3. Scheme Classification

In addition to matters regarding the permissibility of the scheme, concern was raised that the proposed development did not satisfactorily fulfil the requirements of the SRD SEPP to be declared as ‘State Significant Development’.

Clause 8 of the SRD SEPP states as follows:

*(1) Development is declared to be State significant development for the purposes of the Act if—*

*(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and*

*(b) the development is specified in Schedule 1 or 2.*

Schedule 2 of the *SARD SEPP* identifies development at Fox Studios, Moore Park Showgrounds and Sydney Sports Stadium Site that has a capital investment value of more than \$10 million and is not for the purposes of a sporting event as being SSD. The proposed SSDA satisfies both criteria.

Further, as illustrated in Section 5.1.2, the SSDA proposes development for the purposes of *car and coach parking* and *demolition*. These uses are permitted with development consent thus fulfilling Clause (1)(a).

The proposed SSDA satisfactorily addresses the requirements of the SRD SEPP and is suitably declared SSD.



## 5.2. BUILT FORM AND DESIGN

The DPIE has requested the SSDA demonstrate that design excellence has been achieved and that the matters of concern raised by the State Design Review Panel have been addressed or provide justification where changes have not been made.

The Addendum Design Response prepared by Populous and provided at **Appendix B** contains a detailed response to each of the matters raised. Additional justification and further explanation of the motivation behind the design of the proposal is provided, demonstrating that the final SSDA is the best design approach to maintain the integrity and significance of the RHI, accommodate the needs of the users of the site and enable public access and usage. Two key issues that were raised include the level of program proposed within the RHI, and the scale and articulation of the NSB. The proponent's response to these issues are as follows:

- Populous conducted a design exercise to consider alternative locations within the site to accommodate or reduce the level of programming proposed within the RHI building.
- As an initial investigation, consultation with the proponent was conducted in order to reduce the program where possible without impacting the operational management of the facility, the commitment to public access and the needs of the charity tenancies.
- Following this, an assessment of the impact of these alternative locations on the site was undertaken to understand the best outcome for the site.
- As illustrated in the alternative built form massing illustrated in Figure 3, relocation of the internal program within the NSB will disrupt view corridors towards the RHI and will have an adverse impact on the appreciation and significance of the RHI building. The RHI appears crowded and subservient to the NSB, which is not the design intent of the proposal nor creates a positive design response.

Figure 3 – Visual comparison of design alternatives



Picture 1 – NSB as proposed. View towards building from south



Picture 2 – NSB as proposed. View towards building from west



Picture 3 – Alternative option for NSB with additional scale. View towards building from south



Picture 4 – Alternative option for NSB with additional scale. View towards building from west

Source: Populous

The alternative options have also been considered based on the heritage impact to the existing RHI, as discussed within the Revised Heritage Impact Statement at **Appendix D**. The HIS concludes:

*The alternative scheme does not facilitate well views of the eastern ridgeline from the south east and there is no ability to appreciate its termination and therefore an understanding of the overall form of the roof. The additional bulk appears significantly higher than the ridgeline of the RHI and would be the key focal point in this view. The application of an additional storey to the community foyer would represent an overpopulation of the area south of the building.*

*It is appreciated that at present the bulk which is the subject of the options below is located within the RHI. However, as discussed throughout this report, the bulk has been sensitively designed such that it would have no physical impacts. Further, the mezzanine structure which extends only around the outside walls of the internal space allows for appreciation of the original roof form. As such, it is not considered necessary or appropriate to relocate the bulk to the NSB Building.*

Due to the site constraints, there are no other potential areas for the relocation of the programming that would meet the needs of the community, the public and the occupant. As demonstrated, the proponent has undertaken extensive options analysis and is of the conclusion the proposed SSDA presents the most suitable built form approach to the site.

It is further noted the CPMPT in their submission (August 2019) was supportive of the adaptive reuse of the RHI and the proposed internal alterations and concluded that the spatial experience of the powerful central vaulted interior space was preserved. This is in addition to support provided by the CoS in their submission (August 2019) for the bulk, scale and siting of the NSB.

- The secondary principal issue of concern raised regarded the articulation of the NSB and the creation of a grand site entrance into the Moore Park precinct. The building envelope of the NSB was established early in order to ensure a respectful response to the surrounding context, the RHI and the retention of key sightlines.
- The NSB building envelope further correlates with the surrounding precinct through a corresponding height datum (10m) with the approved building envelope that sits opposite the NSB within the Entertainment Quarter. These envelopes on either side of Errol Flynn Boulevard are consistent in scale and will create a welcoming and synchronized entrance into the precinct.

Following this, the façade has been articulated through use of a polycarbonate façade that offers a slight transparency, allowing for a simple façade during the day and a light box at night (refer Figure 4). This design approach encourages activation within the precinct and engagement between the Swifts training players and visitors watching from the adjacent public domain.

Refer to further discussion and justification for additional supplementary issues in the Design Response Addendum at **Appendix B**.

Figure 4 – Render from south-eastern corner of the site



Source: Populous

## 5.3. SECTION 7.11 CONTRIBUTIONS

For the purposes of calculating s7.11 contributions, it is important to acknowledge the various uses proposed within the scheme and the corresponding applicable rates as outlined within the City of Sydney's Contribution Plan 2015 (**Contributions Plan**). In accordance with the plan, we have adopted the most relevant land use description for the various elements of the proposal, and we propose the conditions be modified based on the calculations as detailed in Table 5.

The site is located within the *East Precinct*, and as such the contribution rate has been calculated based on a rate of \$2,544 per additional worker. The calculations are informed by advice received from the CoS on 3 October 2019 confirming that the existing RHI site is suitably defined as a '*function centre*' under Sydney LEP 2012. As the proposal includes a retention of this use, a credit of 119sqm per worker is available based on the existing floor space of 5630sqm.

In addition to the above, the proposed use includes space for three charitable, non-profit uses which will provide community and social support activities and will be maintained during the entirety of the Swans lease of the RHI site. These tenancies amount to 170sqm in area and are as follows:

- Australian Red Cross Blood Bank tenancy (64sqm): A humanitarian aid and community services charity in Australia, registered with the Australian Charities and Not-for-profits Commission.
- GO Foundation (58sqm): A community charity offering scholarships to Indigenous students founded by Indigenous AFL players Adam Goodes and Michael O'Loughlin. The charity is a registered charity with the Australian Charities and Not-for-profits Commission under the 'The Goodes O'Loughlin Foundation Limited'.
- Clontarf Foundation (48sqm): A charity that aims to improve the education, discipline, life skills, self-esteem and employment prospects of young Aboriginal and Torres Strait Islander men, registered with the Australian Charities and Not-for-profits Commission.

Whilst Council's Contributions Plan lists circumstances where exemptions can be waived, it would appear that the above uses do not qualify for exemption.

In our opinion these areas should be exempt from the payment of contributions. Section 7.13(2) of the Act enables a consent authority other than the Council to exercise discretion when applying a Contributions Plan. Given that there does not appear to be any explicit exemption for such uses under clause 1.3 of the Contribution Plan, it is considered that this discretion should be exercised by the DPIE in this instance because of:

- The community service nature of the charity
- The relative minor quantum of floor space in question (1.6% of total GFA)
- The significant improvements to overall public and community access to the RHI arising from the proposal as detailed in the letter prepared by the Sydney Swans (**Appendix S**).

Table 5 – S7.11 revised calculation

Use	Contribution Calculation	GFA	Rate	Worker
Swans and Swifts office and administration spaces (including boardrooms, amenities, meeting rooms, players lounge areas)	<i>Office premises in a building up to and including 3 storeys</i>	3647sqm	33sqm / worker	110.48
Medical tenancy	<i>Health services facility – medical centres, health consulting rooms</i>	414sqm	43sqm / worker	9.62
Café and kitchen	<i>Food &amp; drink premises – restaurants, cafes &amp; take away premises</i>	155sqm	21sqm / worker	7.38

Use	Contribution Calculation	GFA	Rate	Worker
Foundation tenancies		170sqm	Exempt as per Section 7.13(2) of the Act	
Child minding facility	<i>Child care centres</i>	96sqm	38sqm / worker	2.52
Central multipurpose field	<i>Function centres</i>	1807sqm	119sqm / worker	15.18
Central netball court	<i>Function centres</i>	851sqm	119sqm / worker	7.15
Wet areas	<i>Associated with Function Centre</i>	594sqm	119sqm / worker	4.99
Gym spaces	<i>Associated with Function Centre</i>	1318sqm	119sqm / worker	11.06
Additional service/ loading areas	<i>Associated with Function Centre</i>	151.5sqm	119sqm / worker	1.27
Front of house space + circulation	<i>Function centres</i>	1433sqm	119sqm / worker	12.03
<b>Total</b>		<b>10,636.5sqm</b>		181.68
Existing function centre credit	<i>Function centres</i>	Existing GFA of 5630sqm	119sqm / worker	-47.3
<b>Combined Total</b>				<b>134.38</b>

In accordance with the above calculation, the facility will create an additional 134.38 workers in the local area. Based on the contribution rate of \$2,544 per additional worker, a contribution to the amount of **\$341,862.72** is considered a more accurate representation of the amount payable for new infrastructure.

The above contribution rates are based on the City of Sydney Development Contributions Plan 2015 and the CPI released on 31 July 2019. The next CPI release is June 2020 to be released on 30 October 2019. It is understood that the final amount of Contributions will be determined by the City of Sydney prior to determination of the SSDA.

## 5.4. PRECINCT INTEGRATION

The SSDA is a component of an exciting revitalisation and renewal of the Moore Park precinct, involving a number of independent yet integrated development projects, including the Hordern Pavilion, central plaza and Sydney Football Stadium. These projects demonstrate a significant investment and transformation of the broader sporting and recreational precinct to create improved places for public enjoyment, remain competitive in national and international sporting competitions and increase activity within the holistic precinct.

The Department and a number of agencies requested clarification of the integration of the project with the adjacent central plaza and Hordern Pavilion (currently under assessment with City of Sydney, D/2019/830 and D/2019/831 respectively) during design, construction and operation.



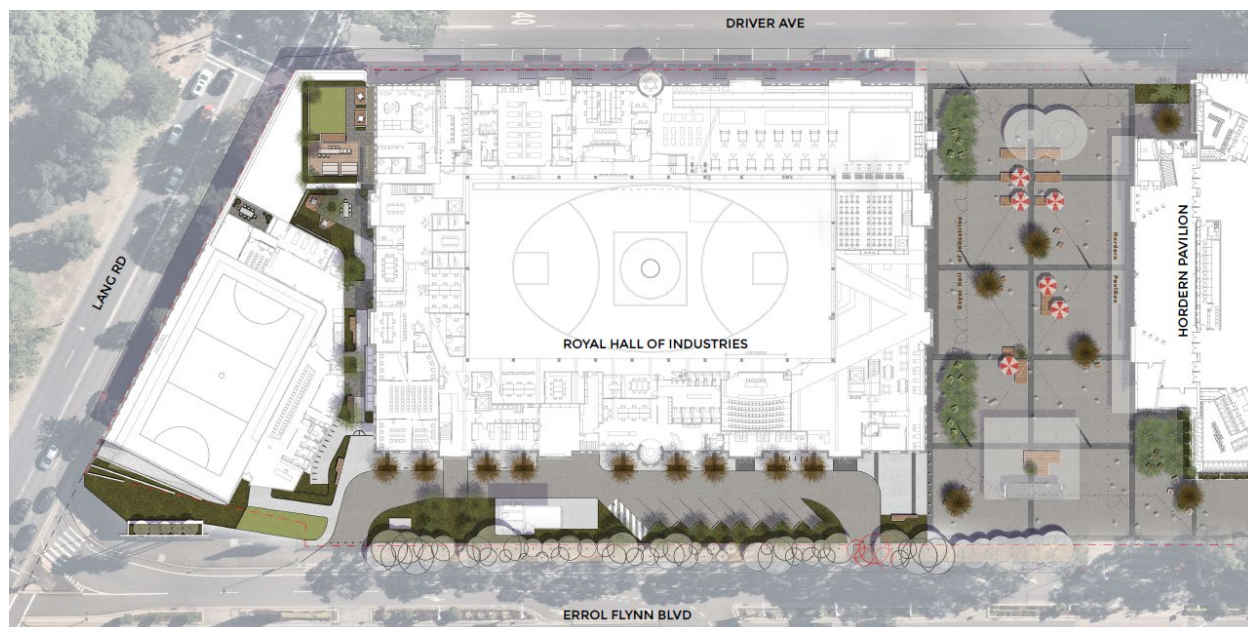
The integration of the precinct is achieved through the coordination of the public domain and landscaping design of all three projects by a common architect (Populous), common landscape architect (Arcadia), the adoption of consistent design principles in all three projects and implementation of construction management measures to ensure coordination during construction.

The proponent has demonstrated ongoing communication and engagement with the proponents of the Plaza DA (PlayOn Group and Pier Projects) and Hordern Pavilion DA (Playbill and Pier Projects) during the SSDA development and RTS process and will continue to engage with these landholders during the design development and construction process. It is further noted that the Sydney Swans forms one half of PlayOn Group, a collaboration between Sydney Swans and Playbill, and therefore has a vested interest in the integration, activation and operation of the broader precinct.

Further detail is provided within the following consultant documentation, which have been prepared in response to received submission commentary.

- Precinct Public Domain Plan prepared by Arcadia (**Appendix H**). An extract is provided at Figure 5. Arcadia have been engaged as the public domain consultant for both SSD-9726 and DA/2019/830, allowing for a consistent design response across the precinct. The four primary principles adopted for public domain integration across the precinct include:
  - Consistency in materiality: Use of bluestone paving and grey bonded aggregate within both the eastern public domain area and central plaza, with use of contrasting exposed agg concrete adjacent to the café on the north-eastern corner of the RHI to distinguish between the two areas of public domain.
  - Complimentary tree species and planting: Use of both deciduous species and evergreen native species are proposed across the precinct. Specifically, the same species family of trees (*zelkova*) is proposed to be utilised across the precinct.
  - Sightlines are maintained across the entire eastern portion of the precinct which is publicly accessible, with uninterrupted view corridors and access provisions.
  - Ease of movement for both vehicles and pedestrians are maintained throughout the precinct, with landscaping features including planting, shrubbery, paving and signage employed to provide a highly legible and coherent public domain.

Figure 5 – Extract of Precinct Integration Plan



Source: Arcadia

- Precinct Lighting Plan prepared by Aurecon (**Appendix H**) outlining the lighting strategy across the public domain and façade lighting. It is noted further development of the Plan and detailed design of the lighting will occur during the design development phase prior to CC. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.

- An analysis of the site consistency with the Entertainment Quarter Concept Plan Approval MP-07\_0144 has been undertaken by Populous and is provided within the Design Addendum Response at **Appendix B**. The proposal is not inconsistent with the approval and demonstrates a consistency in design response through key elements such as car parking and access, pedestrian accessibility, materials, form and detail. There is no conflict between the approval and the proposed SSDA and there is no impediment to preventing more than one consent from operating on the site at one time, given the proposals are not mutually exclusive. As such, the proposal is consistent with and will suitably integrate with any development occurring within the adjacent Entertainment Quarter.
- A Construction Management Plan has been prepared by FDC, the Contractor of the site (**Appendix O**). The Plan includes further detail of how construction will be managed on the site, including site access, deliveries, cranes and vertical lifting, safety, staging and delivery. FDC have undertaken an assessment of the construction timeframes of all programs and have determined there will be minimal overlap of programs, up to one month at most. This intermittent period will be managed through the following measures:
  - Ongoing and regular communication with adjacent contractors;
  - Identification of two vehicular loading points to allow for alternative points of access;
  - All deliveries to be pre-booked to reduce conflict;
  - Staging of the site works to coincide with the adjacent works to avoid conflict; and
  - Implementation of management plans including Waste Management Plan, detailed Noise and Vibration Plan and Construction Pedestrian and Traffic Management Plans to reduce the cumulative impact of works on the surrounding area.

## 5.5. PUBLIC DOMAIN

### 5.5.1. Design Justification

The Preferred Project involves design refinements to further improve the streetscape presentation and public domain character of the site. Improving the permeability of the public domain is a key consideration, noting that the proposal will result in an increase to local patronage and activity within the site. The Department raised concerns regarding the location of the waste storage area, kiosk and fire services within the eastern public domain.

In direct response to the submission received, the proponent has removed the waste storage area from the eastern public domain and is now proposed to be located directly adjacent to the southern elevation of the RHI. It is considered that the location proposed has the least visual impact on the significant facades and has been designed such that it does not extend above the window datum. The waste storage area will be screened with a simple perforated metal, with landscaping provided within the laneway provided to further soften and screen the appearance of the structure. The revised location will allow sufficient storage of all waste streams generated by the proposal and enable convenient collection via a waste MRV within the internal road. As discussed in the Traffic Report Addendum (**Appendix J**) there is sufficient onsite capacity to ensure there is no impact on queuing on Errol Flynn Boulevard. Refer to further discussion within the revised Waste Management Plan (**Section K**). To ensure the eastern public domain provides an attractive and seamless integration with the surrounding precinct, the proponent team re-assessed the location of the substation kiosk and fire services area from a design and engineering perspective. Following this exercise, the proposed location was deemed the most appropriate solution for the site as follows:

- In accordance with Ausgrid 2017 requirements, the kiosk must be located in an area clear of underground and overhead obstructions.
- During the re-design exercise, it was identified there were no viable alternatives within the site that could suitably accommodate these requirements without significant impact on the external façade of the RHI (identified as high heritage significance) and internal redesign. As such, the proposed location is considered to be the most suitable on site.
- In accordance with Fire Safety Guidelines, the fire booster assembly and sprinkler valve must have sufficient access (such as a door to adjacent road or adjacent open space) for a fire truck for servicing, and an exhaust to discharge outside of the building.

- The relocation of the fire services into the RHI would require either the construction of an additional entry in the elevation of the building (with adverse heritage impacts on this heritage-significant façade) or the loss of a public entry and a consequential reduction in the permeability of the site.
- The location of the fire services pump in the NSB is not viable due to the building orientation, which does not able direct and convenient access for a fire truck without removal of the public and players landscaped entry.
- An additional option was considered, involving the location of the fire services and kiosk on the north-eastern corner of the site adjacent to the public plaza or within the public plaza. This would undermine a key objective of the SSDA (improving precinct integration and public access) and is not a viable option.

Whilst the Preferred Project does not involve a relocation of the substation kiosk and fire services annex, it is noted the removal of the waste storage area from this elevation and the associated reduction in scale and clutter will significantly improve the public domain and visual sightlines towards the RHI. It is further noted the Revised Public Domain and Landscaping Plans (**Appendix C**) includes shrubbery up to 2-3m in height to effectively screen these necessary services and utilities.

### 5.5.2. Adjacent Public Domain Works

Within their August submission, the CoS recommended the public domain works for the SSDA include upgrades to the surrounding public domain, including a shared path on Errol Flynn Boulevard, additional pedestrian crossings and lighting along Lang Road. Whilst it is acknowledged the SSDA will generate an increase in patronage capacity within the surrounding area, there is not an exclusive nexus between these works and the SSDA. The footpath network is broadly used by all users accessing the Entertainment Quarter precinct, adjacent Centennial Parklands and transport services on Anzac Parade.

It is further noted within there is a 'Precinct Activation' clause within the Lease. This contractual commitment requires the Sydney Swans to ensure the precinct is revitalised and activated, and includes the following obligations:

- A target marketing analysis and promotion plan to ensure the community is aware of the facilities available within the site.
- A calendar of activation across the year involving tailored events, program objectives, engagement strategies and coordination with stakeholders of the broader precinct.
- A precinct activation fund and establishment of a precinct activation committee which regularly meet on a 6-month basis.

In consideration of the above, the DPIE should have no concern regarding a lack of public activation within the precinct or concern that the Sydney Swans is not committed to ensuring the successful use and engagement within the site.

The City of Sydney Contributions Plan 2015 identifies the allocation of the contributions to certain local infrastructure works, including open space, community facilities, traffic and transport and stormwater and drainage. It is considered the contributions payable to the CoS as calculated within Section 5.3 will ensure that the development reasonably contributes to any necessary public domain upgrades within the surrounding precinct.

Further to this, it is noted the Moore Park 2040 Master Plan involves a number of features that aim to improve the park, including improved access for pedestrians and cyclists, public domain improvements, additional landscaping and increased integration and activation of the broader precinct. Further coordination between the Sydney Swans, PlayOn Group, Playbill, other tenants and the CPMPT is ongoing to ensure the delivery of these initiatives in a timely fashion. The Sydney Swans will work with the CPMPT as the landowner to achieve these goals.

## 5.6. TREES AND LANDSCAPING

As outlined throughout this RTS, amendments to the proposed landscaping and tree removal have been included within the Preferred Project in response to submissions received. Key assessment matters for consideration include:



- Design development to reduce the need for tree removal from seven trees (June lodgement) to four trees (Preferred Project). Two trees require pruning whilst the remainder of the trees on site (56) will be retained with tree protection measures.

The following has been drawn from the Addendum Arborist Report at **Appendix F** to justify the proposed solution:

- An alternative option for the design of the vehicular crossover involving a relocation of the crossover further north was undertaken, however was determined to generate a greater level of impact on tree retention. The alternative design would require the removal of five trees due to encroachment, with an additional two trees affected by minor encroachment. Removal of the secondary vehicle exit would require vehicle exit via the public plaza, or alternatively exit via the entrance – which would have unacceptable safety impacts. The proponent has progressed with the design option that has the least impact on trees and safety.
- The pedestrian Staff and players entry on the eastern portion of the site perpendicular to the RHI has been removed to allow for the retention of tree 18.
- The five existing palm trees adjacent to the south-eastern boundary of the site on Lang Road will be retained due to the important visual contribution to the precinct and site entryway. Whilst these trees are not located within the site boundary, these have been a key consideration and will be retained through construction methodology involving stem protection, staged demolition of the surrounding planter box, installation of a protective fence and retention of existing irrigation system.
- No machinery will be used for the removal of the existing asphalt surface that are within the 3m tree protection zone, instead use of hand tools are required to ensure minimal disturbance of the subsurface root systems. Installation of a protective fence surrounding existing trees is also proposed to ensure protection during construction.
- The use of a flexible and porous subsurface for the construction of the vehicular crossover, reducing structural and load impact on the tree root systems which extend under the crossover.
- The proposal will require pruning of the two trees located on Lang Road adjacent to the southern boundary. The extent of pruning (20% of tree 8 and 13% of tree 9) is not considered to pose a detriment to the tree and is capable of pruning in accordance with Australian Standard 4373-2007 and the International Society of Arboriculture pruning standard of 25%. Attendance of a Utility Arborist during pruning is recommended. Appropriate approvals will be obtained from the City of Sydney where necessary.
- As outlined in the Revised Public Domain and Landscaping Plans at Section 4 of this RTS, the Preferred Project includes an increase in tree planting from 16 trees in the June SSDA lodgement to 26 trees in this PPR. This representing a planting ratio of 6.5 trees for every one tree removed.

## 6. FINAL MITIGATION MEASURES

The final list of measures required to mitigate the impacts associated with the proposed SSDA is detailed in Table 6 below. These measures represent the final and full series of mitigation measures proposed for the project pursuant to clause 7(d)(iv) of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

These mitigation measures include those previously identified in the EIS, with revised and additional mitigation measures included to reflect the additional information, clarification or response to submissions contained in this RTS and PPR.

Table 6 – Final Mitigation Measures

Ref	Mitigation Measure
Transport	
1	The Green Travel Plan is to be finalised in consultation with TfNSW, with reference to the Overview Plan prepared by GTA (April 2019) and implemented as part of the operation of the facility. The Plan is to include provisions for an annual review by the City of Sydney for the first 5 years of operation to assess travel demand and make refinements to the initiatives.
2	The proponent must consult with the Moore Park Events Operation Group during the planning of special events on the site to ensure traffic and transport arrangements of the broader Moore Park precinct are coordinated.
3	Public vehicular access to the site is not permitted during major events and will be managed by Sydney Swans Event Staff and enforced by removable bollards, as outlined in the Traffic and Transport documentation prepared by GTA (October 2019).
Public Domain	
4	Engage with the CPMPT with regard to potential improvements to pedestrian links surrounding the site.
5	A detailed lighting design will be developed for the site guided by the Lighting Strategy prepared by Aurecon to provide liveliness, safety and activation of the precinct.
6	All applicable outdoor lighting is to be design, installed, and operated in accordance with the relevant Australian Standards; AS4282 and/or AS/NZS 1158.3.1.
7	Prior to the issue of a Construction Certificate, the applicant must consult with the CPMPT to ensure all paving, levelling, drainage and other associated works suitably integrate with the treatments, materials and approved levels in the adjacent central plaza (DA2019/830) and Hordern Pavilion (2019/831). The details and outcome of this consultation must be provided to the PCA prior to issue of the Construction Certificate.
8	Internal wayfinding within the site shall be detailed in the construction drawings to provide assistance to both pedestrians and cyclists accessing the precinct.
9	The operation of the facility must not place any operational constraints on the future use of the central plaza.

Ref	Mitigation Measure
Heritage	
10	Prior the commencement of any internal works to the existing building, the Applicant must prepare detailed plans in consultation with an appropriately qualified heritage specialist demonstrating the approved mezzanine level within the RHI can be reversible with no permanent impact on the fabric of the building.
11	An archival recording of the site, its setting and significant details of the RHI is to be undertaken prior to the issue of the Construction Certificate.
12	An Interpretation Strategy is to be undertaken prior to the issue of the Construction Certificate to communicate the values of the site. The Strategy is to be implemented prior to the issue of the Occupation Certificate.
13	All ACHA works carried out during the Royal Hall of Industries Project will be documented to a standard comparable to that required by the Code of Practice for Archaeological Investigation of Aboriginal Objects DECCW 2010 and in consultation with Registered Aboriginal Parties.
14	Prior to the commencement of any external works to the existing building the Applicant must prepare detailed elevation and window plans for the RHI in consultation with an appropriately qualified heritage specialist demonstrating to minimise heritage impacts to the greatest extent practicable.
Sustainability	
15	The detailed design of the facility is to achieve a minimum 5-Star Green Star rating with consideration of the initiatives in the Ecologically Sustainable Development Report prepared by Aurecon (November 2019), and will be certified prior to occupation.
Operation	
16	The draft Security and Events Management Plan prepared by the Sydney Swans will be finalised and updated as necessary following the detailed design and construction of the facility and implemented for the operation of the facility. The final Plan is to include further detail on the management of special events within the facility, including special event waste management, noise management measures and infrastructure bump in and bump out.
17	<p>The Clontarf Foundation, Go Foundation and Blood Bank tenancies are to be retained within the facility during the extent of the primary lease.</p> <p>The Sydney Swans are committed to maintaining the physical tenancies of the Clontarf Foundation, Go Foundation and Blood Bank tenancies to accommodate like uses, whilst also recognising the individual tenure requirements of each organisation.</p>
18	The areas identified for public access within the draft Security and Events Management Plan is to be made available subject to hire agreements for appropriate special events, such as the Mardi Gras Festival. Special events will be managed by the Sydney Swans Match Day and Event Management Team.
19	A commercial waste contract will be set in place prior to occupation and will cover all day to day and function waste requirements.

Ref	Mitigation Measure
20	Patronage capacity within the RHI is not to exceed 1,000 as identified within the draft Security and Events Management Plan during special events. The Sydney Swans event manager is responsible for ensuring there is no exceedances to the patronage capacity.
Noise and Vibration	
21	Operation of the site is to have regard to the acoustic amenity of surrounding landowners and implement the management measures outlined in the Noise Management Plan prepared by GHD (April 2019). The Plan is to be reviewed and updated as required during operation.
Public Safety	
22	<p>A Security Risk Assessment strategy in relation to the development, to identify, assess, manage and minimise the risks of exposure to hostile vehicles, including areas of people congregation and paths between the new facility and public transport nodes.</p> <p>The Security Risk Assessment strategy must be prepared in accordance with Australia's Strategy for Protecting Crowded Places from Terrorism and Hostile Vehicle Guidelines for Crowded Places.</p>
Reflectivity	
23	Glazing to have a maximum normal specular reflectance of 20%.
Flooding	
24	The Emergency Flood Management Plan prepared by TTW (September 2019) is to be implemented during occupation. The Plan is to be updated as required if flood mitigation works are undertaken in the surrounding catchment area to take into account changes in flood behaviour.
Dilapidation	
25	<p>A pre-construction Dilapidation Report is to be prepared and submitted to the PCA prior to the issue of a Construction Certificate detailing the current structural condition of all retained existing and adjoining buildings, infrastructure and roads within the 'zone of influence'.</p> <p>The Pre-Construction Dilapidation Report must also include a photographic recording of the public domain site frontages.</p>
26	A post-construction Dilapidation Report is to be prepared and submitted to the PCA at the completion of construction works to ascertain whether the construction works created any structural damage to adjoining buildings, infrastructure and roads.
Noise and Vibration	
27	The development must be constructed with the aim of achieving the construction noise management levels detailed in the Noise and Vibration Impact Assessment prepared by GHD (April 2019). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the CEMP.

Ref	Mitigation Measure
Transport	
28	A Construction Pedestrian and Traffic Management Plan is to be developed by the appointment contractor in collaboration with the Sydney Coordination Office, confirming the detailed construction methodology and specific measures for safely managing construction traffic, pedestrians and cyclists in the surrounding area.
29	The CEMP is to include a Dust Management Plan with consideration of the recommendations in the Air Quality Impact Assessment prepared by GHD (October 2019).
30	A permit is required to be issued by the CPMPT for each period of works requiring access from Driver Avenue.
Tree Protection	
31	A Tree Protection Plan is to be prepared by the Project Arborist which assesses the degree of impact to any Tree Protection Zones and provide strategies and mitigation measures for how to minimise or mitigate these impacts. Consideration should be afforded to the recommendations in the Arboricultural Impact Assessment prepared by Allied Tree Consulting (October 2019).
32	The Project Arborist is to be present during excavation and demolition of existing surface pavement, and no machinery is to be utilised for removal of asphalt surface within a nominated TPZ area. The protection measures identified within the Arboricultural Impact Assessment Addendum prepared by Allied Tree Consulting (October 2019) are to be considered.
33	A detailed Construction Methodology and Tree Retention Plan is to be developed to manage the retention of the five <i>cabbage-tree palm</i> trees on the corner of Lang Road and Errol Flynn Boulevard. This is to be prepared prior to the issue of a Construction Certificate.
Waste	
34	Any waste transported off-site is waste classified in line with EPA guidelines and taken to an appropriately licensed facility.
35	Preparation and implementation of an Unexpected Finds Protocol prior to the issue of the Construction Certificate. If dewatering is required as a result of the proposed development, water is to be disposed of by a liquid waste contractor.
Heritage	
36	An archaeological induction is to be prepared for all on site contractors, particularly those involved in the demolition and excavation works, to familiarise workers with the recommendations and practices outlined in the Archaeological Work Method Statement prepared by AMAC Archaeological (May 2019), and the process should they encounter an unexpected archaeological resource.
37	A Project Archaeologist is to be appointed and presented during relevant construction periods to inspect the underfloor cavity of the RHI ground floor. Should intact underfloor deposits be identified and be disturbed by the development works, these are to be archaeologically excavated and removed prior to any works occurring within the floor cavity.
Services and Utilities	

Ref	Mitigation Measure
38	Should groundwater be intercepted during excavation works, licenced water entitlement is to be obtained to account for the take of water.
39	A Section 73 Compliance Certificate under the Sydney Water Act 1994 is to be obtained from Sydney Water prior to the issue of a Construction Certificate.

## 7. CONCLUSION

This RtS and PPR provides a comprehensive and consolidated response to the Agency and community submissions received in response to the exhibition of SSDA 9726 for the adaptive reuse of the Royal Hall of Industries for a multi-purpose sport and community facility, and the home of the Sydney Swans and NSW Swifts.

The development of an internationally recognised facility will strengthen the identity of the sporting industry in NSW, support the performance of two prominent sporting teams, the Sydney Swans and NSW Swifts, and strengthen the role of Sydney as a global city. The seamless interaction between the RHI, proposed Swifts building and surrounding public realm through landscaping and public domain works will contribute to the local character and create activation and encourage community visitation to the site, rejuvenating the currently under-utilised precinct and contributing to the vibrancy and vitality of the broader Moore Park Showgrounds precinct.

During the RtS process the proponent and the project team have sought to refine the project design to address identified concerns and have conducted additional consultation with stakeholders such as the DPIE; CoS, EES, TfNSW, CPMPT, Sydney Water, NSW Heritage Council, Mardi Gras and GANSW.

The SSDA for the design, construction and operation of the multi-purpose sport and community facility, as supplemented by this RTS and PPR, addresses each of the matters identified by the Secretary's Environmental Assessment Requirements and those matters identified in the *Environmental Planning and Assessment Regulation 2000*. The environmental assessment concludes that, subject to the implementation of mitigation measures outlined in the SSDA, Section 5 and Section 6 of this RTS and PPR the proposed development would not result in any unacceptable impacts and will generate a number of significant social and economic benefits for Sydney and NSW. Accordingly, the DPIE is requested to complete its assessment of the project and recommend the project be approved by the Minister for Planning and Public Spaces.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.



# **APPENDIX A      REVISED ARCHITECTURAL PLANS**

## **APPENDIX B**

## **ADDENDUM DESIGN REPORT**

# **APPENDIX C      REVISED PUBLIC DOMAIN AND LANDSCAPE PLANS**

## **APPENDIX D**

## **REVISED HERITAGE IMPACT STATEMENT**

# **APPENDIX E      CONSERVATION MANAGEMENT PLAN**

# **APPENDIX F      WINDOW GLAZING REPORT**

## **APPENDIX G**

# **ADDENDUM ARBORICULTURAL IMPACT STATEMENT**

# **APPENDIX H      PRECINCT PUBLIC DOMAIN PLAN**



# **APPENDIX I      PRECINCT LIGHTING PLAN**

## **APPENDIX J**

# **ADDENDUM TRAFFIC AND TRANSPORT REPORT**

## **APPENDIX K      REVISED WASTE MANAGEMENT PLAN**

# **APPENDIX L      REVISED ESD REPORT**

## **APPENDIX M      NCC CONSULTANT ADVICE**

## **APPENDIX N**

# **ADDENDUM ENVIRONMENTAL CONSTRUCTION MANAGEMENT PLAN**

# **APPENDIX O      DRAFT CONSTRUCTION MANAGEMENT PLAN**



## **APPENDIX P**

# **DRAFT EVENT AND OPERATIONAL MANAGEMENT PLAN**

## **APPENDIX Q      MICROBAT SURVEY REPORT**

## **APPENDIX R      FLOOD MANAGEMENT STRATEGY**

## **APPENDIX S      SYDNEY SWANS BROCHURE**

## **APPENDIX T**

## **SYDNEY SWANS COMMUNITY LETTER**

## **APPENDIX U**

## **MARDI GRAS MEDIA RELEASE**

# **APPENDIX V      MUSIC STORMWATER MODEL**



