

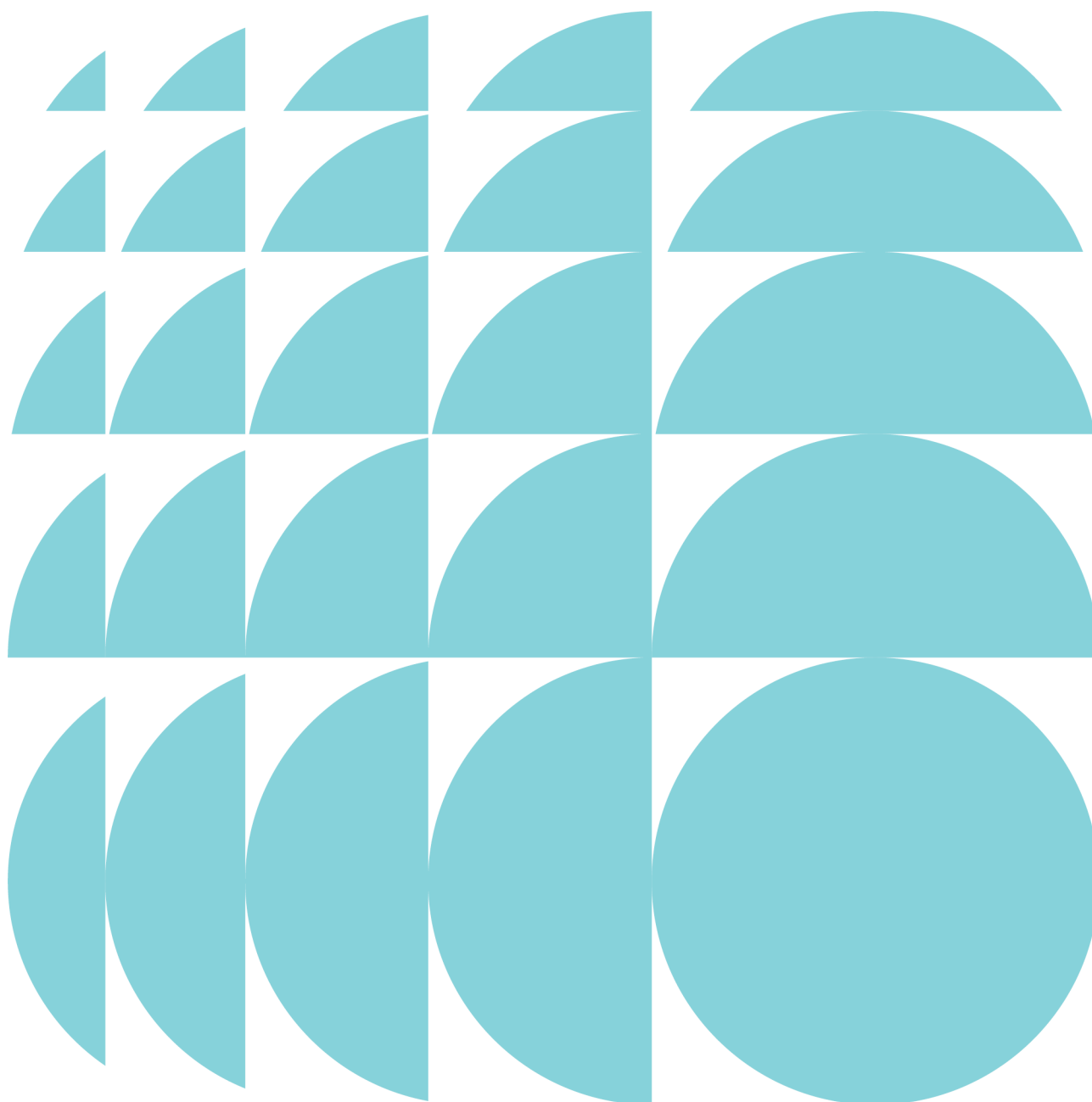
# ETHOS URBAN

## Response to Submissions and Amended Proposal

Sydney Football Stadium 40-44 Driver Avenue,  
Moore Park  
Stage 2 SSD DA 9835

Submitted to NSW Department of Planning,  
Infrastructure and Environment  
On behalf of Infrastructure NSW

2 September 2019 | 218948



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# Contents

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1.0	Introduction	4
2.0	Further consultation	7
3.0	Public exhibition and submissions	9
3.1	Submissions by agencies	26

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4.0	Amendments to the application	27
5.0	Clarification, additional information and further assessment	33
5.1	Design integrity	33
5.2	Number of events	33
5.3	Accessibility and circulation	37
5.4	Social impact assessment	41
5.5	Pedestrian wind environment	42
5.6	Transport	43
5.7	Visual privacy	45
5.8	Visual and view impacts	47
5.9	Stormwater, flooding, and water use	48
5.10	Noise and Vibration	50
5.11	Crime and safety	51
5.12	Contamination	51

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6.0	Final mitigation measures	52
7.0	Conclusion	57

## Figures

Figure 1	Updated render of the proposed stadium	6
Figure 2	Breakdown of the number and category of submissions	10
Figure 3	Summary of key issues identified in public submissions	11
Figure 4	Updated materials and finishes	32
Figure 5	Examples of national and international stadia utilising grand entry stairs and a render of the proposed stairs	40
Figure 6	Render of the proposed Moore Park Terrace stairs	41
Figure 7	Wind tunnel testing locations showing where trees were included in the testing	43
Figure 8	View from the Level 3 terrace	46
Figure 9	View from the Level 4 terrace	46
Figure 10	View from the stair landing between Level 2 and 3	46
Figure 11	View from the stair landing between Level 3 and 4	46
Figure 12	View from the Level 4 atrium space	46
Figure 13	View from the Level 2 Club Lounge	46
Figure 14	Additional tree planting (areas #2) along the eastern side of the stadium	47
Figure 15	Analysis of water demand and savings	49

# Contents

## Tables

Table 1	Details of stakeholder meetings during the public exhibition period	7
Table 2	Summary of public and organisation submissions by issue raised	12
Table 3	Key amendments to the application	27
Table 4	10 World Cups in 10 Years, with facility requirements	34
Table 5	Stormwater treatment targets and results	49
Table 6	Final Mitigation Measures	52

## Appendices

<b>A</b>	Detailed Response to Agency Submissions and Department of Planning, Infrastructure and Environment letter <i>Ethos Urban</i>
<b>B</b>	Revised Architectural Plans, Design Report, Privacy Review, and Entry Stairs Analysis <i>COX Architecture</i>
<b>C</b>	Revised Landscape Plans and Design Report <i>Aspect Studios</i>
<b>D</b>	Updated Site Auditor Letter <i>Serversa</i>
<b>E</b>	Unexpected Contamination Finds Protocol + Site Auditor Certification <i>Serversa</i>
<b>F</b>	Updated Noise and Vibration Impact Assessment <i>Arup</i>
<b>G</b>	Addendum Wind Data Analysis <i>Arup</i>
<b>H</b>	Updated Aboriginal Cultural Heritage Assessment Report <i>Curio Projects</i>
<b>I</b>	Lift capacity statement <i>Arup</i>
<b>J</b>	Response to Transport for NSW's Submission <i>JMT</i>
<b>K</b>	Waiver for the need to prepare a BDAR <i>DPIE</i>
<b>L</b>	Updated Visual and View Impact Assessment <i>Ethos Urban</i>
<b>M</b>	Addendum Social and Economic Response <i>Ethos Urban</i>

# Contents

- N** Addendum Stormwater Response  
*Aurecon*
- O** CPTED Peer Review  
*Intelligent Risks*
- P** Public Exhibition Consultation Outcomes Report  
*Ethos Urban*
- Q** Updated Design Integrity Assessment  
*INSW*
- R** Accessibility and DDA Review  
*Before Compliance*

## 1.0 Introduction

An Environmental Impact Statement (EIS) was prepared on behalf of Infrastructure NSW in support of a detailed State Significant Development (SSD) Development Application (DA) for Stage 2 of the Sydney Football Stadium Redevelopment at 40-44 Driver Avenue, Moore Park (SSD DA-9835). The statutory public exhibition process for the SSD DA was from 19 June 2019 to 17 July 2019, however, this period was extended by one week until 24 July 2019 by the Department of Planning, Industry and Environment (the Department).

Public exhibition occurred in accordance with the requirements of the *Environmental Planning and Assessment Act, 1979* (EP&A Act). In total, 84 submissions were received in response to the public exhibition of the EIS. These included submissions made by State and local Government agencies and authorities, organisations, and from the general public. The Department also issued Infrastructure NSW a letter requesting that a Response to Submissions be prepared including clarification of certain matters arising from the exhibition period and the EIS.

Infrastructure NSW and its consultant team have considered all issues raised in the submissions and prepared a detailed response in this report and the accompanying documents, in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). A considered and detailed response to all submissions made has been provided in the accompanying documentation, including the response table in **Appendix A**, with the key issues discussed in **Section 3.0** and additional information provided in **Section 4.0** and **5.0** and the appendices attached to this Report, where appropriate.

In responding to and addressing the range of matters raised by State and local Government agencies and authorities, Infrastructure NSW has sought to refine the detailed design of the proposal to further demonstrate how the development can respond to those matters raised in the submissions. These design changes include:

- changes to the roof including rationalising the materials and structure, relocating the photovoltaic array, reducing the overall extent of the roof by between 4m-5m in width (in plan form) and by between 2m-2.5m in height (to the outer edge low point), and removing the roof skirt;
- changes to the facade including integrating the louvred screens into the facade system, changing the base of the stadium to textured and coloured precast concrete in the style of sandstone, and changing the colour of the louvres to a bronze metallic finish;
- internal changes to the stadium including removing landscaping within the inaccessible terraces on Level 2, 3, and 4 and repurposing the accessible terraces on Level 5 for building plant; and
- changes to the public domain including changes to the geometry and location of planting (while retaining in excess of the 1.5:1 ratio of trees replaced to lost), changes to the entry stairs off Driver Avenue and Moore Park Road to accommodate pedestrian flows, rationalising access from the MP1 carpark, providing an entry ramp in the south eastern corner of the site, and changes to the interface with Fox Studios including new planting and the reinstatement of their vehicle entry ramp.

**Section 2.0** outlines the additional stakeholder engagement that Infrastructure NSW has completed since the SSD DA was publicly exhibited. **Section 3.0** provides a summary of the statutory consultation process, and **Sections 4.0** and **5.0** of this Report and the accompanying appendices provide an analysis and assessment of the proposed changes and the refined project more broadly. Final measures to mitigate the impacts associated with the refined proposal are detailed in **Section 6.0**. The mitigation measures have been updated and revised to respond to a number of matters raised in submissions.

In summary, all environmental impacts of the proposed development remain consistent with or lesser than the assumptions made under the approved Stage 1 Concept Proposal (SSD 9249). The social and economic impacts and benefits of the proposed development have been further quantified as part of this Report. Having regard to the relevant environment, social and economic considerations, the proposed development is considered to be an appropriate and high-quality outcome for the site.

The following consultants' reports and supporting information either updates or replaces the material originally submitting in support of the EIS or constitutes new information:

- detailed record and response to submissions table prepared by Ethos Urban (**Appendix A**);
- revised Architectural Plans, Design Report, Privacy Review, and Entry Stairs Analysis prepared by COX Architecture (**Appendix B**);
- revised Landscape Plans and Design Report prepared by Aspect Studios (**Appendix C**);
- updated Site Auditor Letter prepared by Senversa (**Appendix D**);
- unexpected Contamination Finds Protocol and Site Auditor Certification prepared by Senversa (**Appendix E**);
- updated Noise and Vibration Impact Assessment prepared by Arup (**Appendix F**);
- addendum Wind Data Analysis prepared by Arup (**Appendix G**);
- updated Aboriginal Cultural Heritage Assessment Report prepared by Curio Projects (**Appendix H**);
- lift capacity statement prepared by Arup (**Appendix I**);
- response to Transport for NSW's Submission prepared by JMT Consulting (**Appendix J**);
- waiver for the need to prepare a BDAR issued by DPIE (**Appendix K**);
- updated Visual and View Impact Assessment prepared by Ethos Urban (**Appendix L**);
- addendum Social and Economic Response prepared by Ethos Urban (**Appendix M**);
- addendum Stormwater Response prepared by Aurecon (**Appendix N**);
- updated CPTED report completed by Intelligent Risks (**Appendix O**);
- Public Exhibition Consultation Outcomes Report prepared by Ethos Urban (**Appendix P**);
- updated Design Integrity Assessment prepared by INSW and certified by the Panel (**Appendix Q**); and
- Accessibility and DDA review prepared by Before Compliance (**Appendix R**).

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 Ethos Urban and dated 12 June 2019, as relevant.



**Figure 1** Updated render of the proposed stadium

*Source: COX Architecture*



## 2.0 Further consultation

The Department placed the SSD DA on public exhibition between 19 June 2019 and 24 July 2019 (including a one week extension). During this time, the project team undertook further consultation with stakeholders. These additional consultation activities are summarised in the Public Exhibition Consultation Outcomes Report at **Appendix P**, and include the following:

- Emailing 28 stakeholders to provide them with an update on the planning process and to offer to meet and discuss the project and provide feedback. Follow up emails were issued if a response had not been received. NRL, Rugby Australia, University of Technology Sydney, Entertainment Quarter, Saving Moore Park, and Kira KU Childcare indicated a meeting was unnecessary as they had a sufficient understanding of the project from earlier consultation. Three (3) stakeholders accepted the meeting request, and all others either did not respond or confirmed they did not require a further meeting. Meetings were ultimately held with Fox Studios, Sydney Business Chamber and the Centennial Parklands Community Consultative Committee, with the preliminary feedback received detailed in the table below.
- Meeting with the project’s Community Consultative Committee (CCC), whose membership includes Councillors from the City of Sydney and Randwick City Council, local residents, and interested community members. The meeting provided the CCC with information on how to make a submission as well as provided an update on the Stage 2 SSD DA planning process. Preliminary feedback received from CCC members is detailed in the table below.
- Emailing an update to the project distribution list, comprising interested community members (259) who registered their details at an information session during the Stage 1 and/or Stage 2 consultation programs, or had previously contacted the project team. The project update announced the Stage 2 public exhibition period dates and provided instruction on how to lodge a submission.
- Distributing postcards to 23,000 local residents, using the same distribution range as the Stage 2 pre-lodgement consultation program. The flyer announced the Stage 2 public exhibition period dates and provided instruction on how to lodge a submission, along with information on upcoming demolition works.
- Updating the project website at <http://infrastructure.nsw.com/sfs> regularly to provide information about the public exhibition and key documents, and how to make a submission.
- Maintaining the ongoing project email and phone number hotline for the community to provide feedback or ask questions directly to the project team. No calls were received during the public exhibition period and only one email was received requesting further information on Stage 2.

**Table 1 Details of stakeholder meetings during the public exhibition period**

Date	Group	Summary of consultation and feedback received
19 June 2019	Sydney Football Stadium Redevelopment Community Consultative Committee (CCC)	<ul style="list-style-type: none"> <li>• Update provided on Stage 1 works, Stage 2 public exhibition, and community complaints.</li> <li>• Presentation on parking by the Centennial Park and Moore Park Trust.</li> <li>• Responses from Infrastructure NSW to ongoing issues regarding disability access, the Driver Avenue steps and other issues.</li> <li>• Feedback received included that the 2 lifts provided are insufficient, there are safety concerns for the Driver Avenue stairs, and issues with scale and bulk.</li> </ul>
2 July 2019 (emailed feedback) 6 August (meeting)	Centennial Parklands CCC	<ul style="list-style-type: none"> <li>• The following feedback was provided through email correspondence:                             <ul style="list-style-type: none"> <li>- opposition to the continued use of Moore Park for car parking;</li> <li>- dissatisfaction with the large bulk leading to shadowing;</li> <li>- views that there is an abuse of scale around the Parklands; and</li> <li>- scale of naming rights signage on the stadium not being sympathetic to the area.</li> </ul> </li> <li>• CCC was unavailable to meet during the formal exhibition period. A presentation and discussion on Stage 2 was undertaken 6 August 2019 to address the above feedback and issues outlined in their Stage 2 Submission.</li> </ul>

Date	Group	Summary of consultation and feedback received
		<ul style="list-style-type: none"> <li>• The meeting was attended by members of the CP CCC comprising regular users of the Park, members of the CPMP Trust, and members of project team.</li> <li>• Infrastructure NSW provided responses to the following issues: parking on Moore Park, shadowing over Kippax Lake, signage zones, visual impact, Kippax Lake water quality, disability access, and access to Moore Park.</li> <li>• The CP CCC provided the following feedback during the presentation:               <ul style="list-style-type: none"> <li>- Infrastructure NSW needs to change behaviour around public vs private transport methods by encouraging public transport and be proactive towards finding a solution to satellite parking</li> <li>- The CPMP Trust would like assistance from Infrastructure NSW to prevent people cutting across the Parklands on Moore Park when arriving by Light Rail. Infrastructure NSW will continue discussions with Trust to find a collaborative solution.</li> </ul> </li> </ul>
11 July 2019	Fox Studios	<ul style="list-style-type: none"> <li>• Fox Studios requested a meeting to gain a better understanding into issues associated with overlooking into the Fox Studios precinct from the stadium; noise and vibration impacts during construction and operation; and to discuss potential mitigation measures.</li> <li>• COX Architecture presented the possible views from the stadium to Fox Studios. It was agreed screening measures could be incorporated into the design and the use of translucent glass over the key sightlines of issue would be investigated by the design team.</li> <li>• Infrastructure NSW agreed to undertake further noise monitoring with Fox Studios to understand whether noise can penetrate the sound studios.</li> <li>• Fox Studios indicated it would like to enter into a tri-partite agreement with Infrastructure NSW and the lead construction contractor to address any shortfalls or gaps in the consent conditions in relation to matters raised.</li> <li>• Infrastructure NSW discussed the need for ongoing dialogue.</li> </ul>
23 August 2019	Sydney Business Chamber	<ul style="list-style-type: none"> <li>• The Sydney Business Chamber requested a briefing on Stage 2 and an update on the project. The Chamber expressed a desire to be kept informed of project progress.</li> </ul>

The additional consultation exercises described above have provided an opportunity for the community and key stakeholders to engage with the planning process, meet with the project team and technical experts, offer feedback, and be kept informed as the project progresses. Those issues discussed with stakeholders were replicated in their respective submissions, which have been addressed in the following sections.

### 3.0 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 4.0** and further assessed in **Section 5.0** below, as well as the revised and updated mitigation measures at **Section 6.0**.

#### Approach to general public 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 a large number of submissions raise similar issues, rather than addressing each submission individually the issues raised in the submissions have been summarised and where possible bundled into Issue Categories. A description of these 'Issue Categories' is provided in the analysis below.

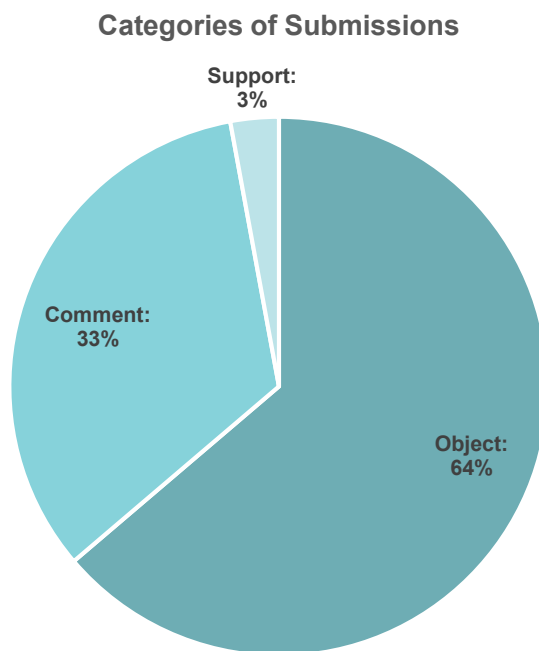
It is noted that 12 (17%) of the submissions received were template letters adopted from two separate templates.

#### Analysis of public submissions

The number of times a particular issue(s) has been raised in a submission received from the general public and organisations has been identified. This analysis has been completed to determine potentially recurring themes/concerns and is not intended to discount issues raised less frequently or in a fewer number of submissions. A total of 69 submissions were received from the general public, special interest groups and stakeholders during the exhibition period for the project. Of these, 44 objected to the proposal, 2 supported the proposal, and 23 neither supported nor objected to the proposal (see **Figure 2**).

Those submissions identified as being from special interest groups and stakeholders included:

- Fox Studios Australia;
- Alliance of Moore Park Sports;
- BIKEast;
- Centennial Parklands Community Consultative Committee (CCC);
- Centennial Park Residents Association;
- Darlo Residents Against Replacing Alliance stadium;
- The Paddington Society;
- Rugby Australia;
- Cricket NSW;
- Sydney Roosters;
- Paddington Darlinghurst Community Working Group;
- Saving Moore Park;
- Sydney FC; and
- Sydney Swans.



**Figure 2 Breakdown of the number and category of submissions**

**Geographic distribution of submissions**

Of the submissions received from the general public, 33 (49%) were identified as originating from postcodes within a 2 kilometre radius of the site comprising the suburbs of Paddington, Centennial Park, Darlinghurst, Randwick, Redfern, Surry Hills, Waterloo and Woollahra. A remaining 12 submissions (18%) were from other areas within Metropolitan Sydney including from the Inner West, Northern Beaches, Northern Suburbs, and Eastern Suburbs, and one submission was from the South Coast. Eight (8) submissions (12%) did not disclose their origin. This indicates that there is greater local interest in the project, and that the SSD DA has not appealed to a significant wider audience.

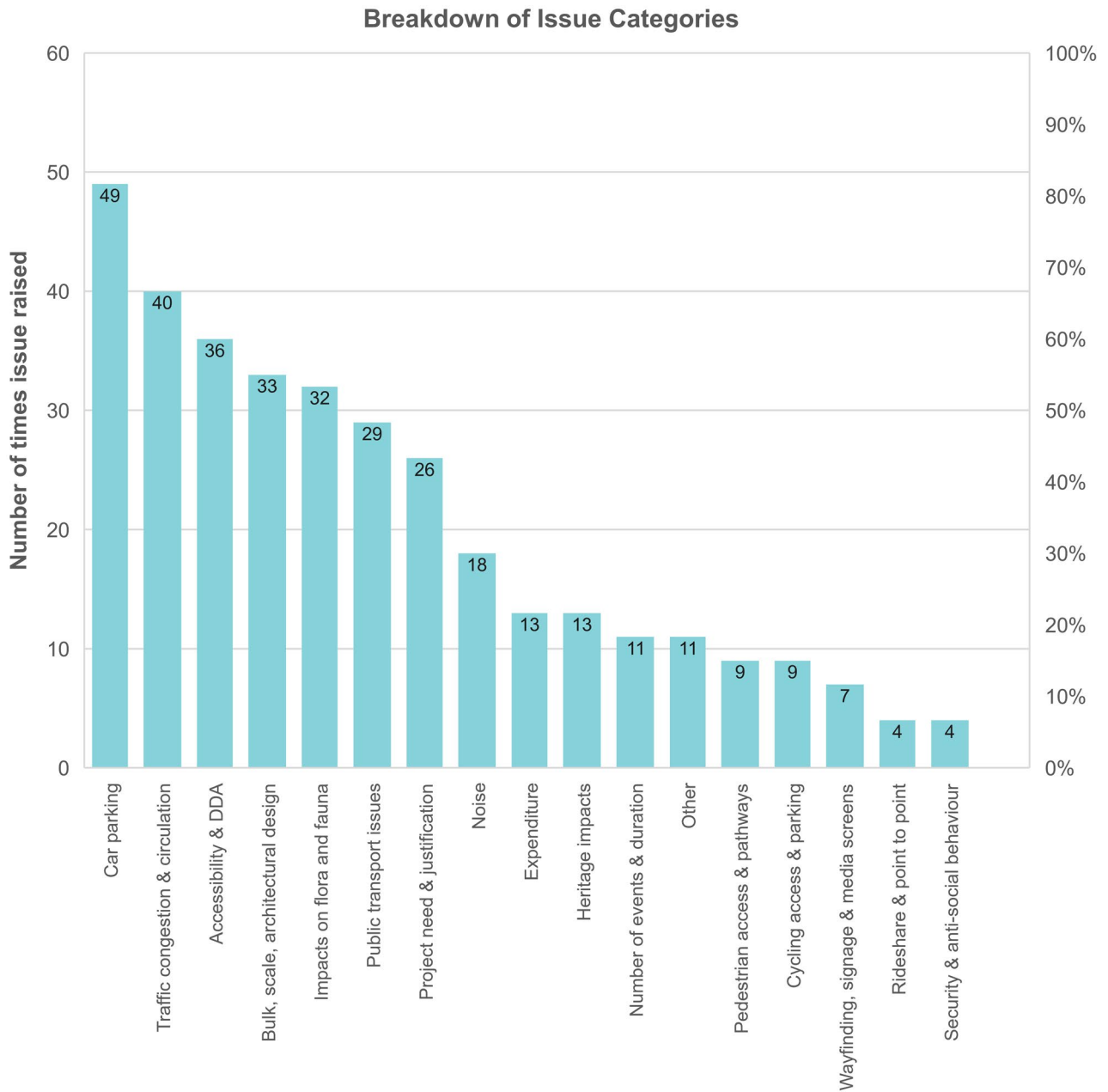
All submissions from organisations and local interest groups were identified as being from the immediate local area, with the exception of Sydney FC and the Sydney Swans, which identified their offices as being located within the Inner West and Eastern Suburbs.

**Analysis of issues raised**

**Figure 3** below provides a summary of the issues raised in the public submissions and those from key organisations and local interest groups received during the public exhibition period <sup>1</sup>. 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 5.0** of this Report which provides additional information and/or an assessment where it is warranted.

<sup>1</sup> I.e: it includes a tally of the frequency of an issue raised – a single submission could discuss a number of the identified key issues



**Figure 3 Summary of key issues identified in public submissions**

NOTE: Figures are inclusive of objections, support and comments <sup>2</sup>

<sup>2</sup> The 'other' issues category captures those issue tags that had 2 or less mentions and included issues such as Unsolicited Proposals, consultation, overshadowing, sustainability, BCA requirements, and more. These issues were infrequent and as such were not considered to be significant community issues requiring a response.

**Table 2 Summary of public and organisation submissions by issue raised**

Issue tag	Summary of issue	Response	Reference to information
Carparking	We must ensure this parkland is protected, and not used as overflow parking for private vehicles.	Infrastructure NSW and the SCSG Trust do not control temporary event parking on Moore Park, which is managed by the CPMP Trust. In this instance, the proposed development does not prevent or otherwise impede the planned removal of parking on Moore Park as managed by the CPMP Trust. The stadium is capable of operating without the parking provided at Moore Park through a shift in transport modes to better utilise non-car travel modes.	-
	The retention of match-day parking with the same or similar proximity to the stadium is important for staff, members, and fans. Additional parking solutions need to be explored such as 'park & ride' options to other transport hubs and across the city	<p>The removal of parking on Moore Park is a matter for the CPMP Trust who manage and control this land. If and when the Trust make this decision, they will need to devise a strategy to offset the loss of parking as outlined in the <i>Moore Park Master Plan 2040</i>. The removal of this parking would not impact on the operation of the stadium.</p> <p>The project identifies a suite of initiatives that patrons and event users can rely on to travel to and from the site other than private vehicles. The range of measures / initiatives are wide ranging and sufficiently flexible to adapt to a stepped change. This means that if and when parking scenarios do change the GTP initiatives can be commensurately ramped up.</p> <p>Section 6.6.2 of the Transport Assessment at Appendix H of the EIS (and the updated Transport Assessment at <b>Appendix J</b>) considered a scenario where parking is removed from EP2 and EP3 and relocated to satellite park and ride areas. The analysis confirmed that there would be sufficient capacity in the transport network to accommodate the changed parking arrangements. Light rail and public transport will have additional capacity to transport people to the SFS to offset the loss of parking should EP2 and EP3 not be available.</p>	Section 6.6.2 at Appendix H of the EIS, and <b>Appendix J</b>
	There are existing issues with parking in Paddington and Surry Hills during major events, which will continue to be an issue.	There is the potential for overflow parking in suburbs and areas surrounding the stadium for patrons using private vehicles to access the site who do not utilise available parking within the Entertainment Quarter or temporary event parking. This overflow could occur in areas of Centennial Park, Kensington, Paddington and Randwick, but would ultimately not be greater than what is experienced with the current stadium. The proposed development is of a comparable capacity to the former stadium and does not introduce any additional parking demands. Existing time restrictions and resident/business parking permit requirements will continue to be managed and enforced by the relevant local road authorities.	Section B6 of Appendix H of the EIS
<b>Traffic congestion and vehicle circulation</b>	Roads are already badly congested, meaning the status quo is unacceptable and must not be allowed to continue with the new stadium.	The exhibited EIS was supported by Arup/JMT traffic modelling which tested the worst-case scenario, being double header maximum capacity events at the SCG and SFS. The modelling tested potential impacts on the operation of key intersections in Moore Park during the worst 30-minute	Section 6.5 of Appendix H of the EIS

Issue tag	Summary of issue	Response	Reference to information
		<p>peak hour period prior to and after an event. It confirmed that the intersections would continue to operate at a Level of Service (LOS) category B or C, which is an acceptable level of service in the RMS' <i>Traffic Generating Development Guidelines</i>. LOS B and C are defined as intersections that are operating well with spare capacity and some delays. The worst-case scenario traffic conditions resulting from the operation of the proposed stadium are neither unreasonable nor different from the former stadium</p>	
	<p>Traffic will become gridlocked, especially so, if a reduction in on-site car parking is not prioritised.</p>	<p>As discussed above, the traffic modelling completed as part of the Transport Assessment at Appendix H of the EIS confirms that the traffic conditions resulting from the proposed stadium will not be worse than the former stadium. Rather the combined effects of no increased car parking (compared to current levels), significant improvements in public transport provision and accessibility and implementation of the Green Travel Plan measures indicates the stadium is capable of generating less traffic than the previous stadium.</p> <p>Section 6.6.2 of the Transport Assessment at Appendix H of the exhibited EIS, as well as the updated Transport Assessment at <b>Appendix J</b>, both consider a scenario where parking is removed from EP2 and EP3 and relocated to satellite park and ride areas. The analysis confirms that there would be sufficient capacity in the transport network to accommodate the changed parking arrangements.</p>	<p>Section 6.6.2 of Appendix H of the EIS, and <b>Appendix J</b></p>
<p><b>Accessibility and DDA</b></p>	<p>Submissions raised a number of issues regarding accessibility and the design of the site to cater for those with disabilities. In particular, concern was raised that:</p> <ul style="list-style-type: none"> <li>providing two lifts on the Driver Avenue frontage of the site may lead to patrons experiencing long delays.</li> </ul>	<p>The two lifts provided are capable of accommodating the expected demand prior to or after an event. This has been confirmed by both Arup, which has provided technical lift advice, and Before Compliance, which has assessed the proposal from an accessibility and DDA perspective.</p> <p>In the unlikely event that both lifts are unable to operate, equitable access is facilitated via the entrances from Moore Park Road. In this regard, information on the best path of travel for persons with mobility impairments will be made available on the SFS website to assist in travel planning prior to an event. Variable wayfinding signage or staff within the site would also be able to assist in travel planning for those already on site.</p>	<p><b>Appendix I, and Appendix R</b></p>
	<p>That the principal entrance to the stadium is via stairs and impacts to continuous path of travel from the stadium through to Driver Avenue, which could impact people with reduced mobility including people who use wheelchairs or walkers, who have prams or who struggle with stairs because they are frail or have small children. This has the potential to impact safety and cause injury.</p>	<ul style="list-style-type: none"> <li>The stairs to the stadium concourse from the Driver Avenue frontage of the site are complemented by two (2) lifts to provide accessible travel from Driver Avenue. As discussed above, these lifts are capable of accommodating the expected patron demand in all operating scenarios and have been confirmed to meet applicable standards and legislative requirements.</li> <li>The Moore Park Terrace stairs have been designed to meet the Australian building regulations and codes, and the recommendations of</li> </ul>	<p><b>Appendix I</b> and the Entry Stairs Analysis at <b>Appendix B</b></p>

Issue tag	Summary of issue	Response	Reference to information
		<p>the Sports Grounds Safety Authority's <i>Safety in Design of Sports Grounds</i> publication.</p> <ul style="list-style-type: none"> <li>• The proposed Moore Park Terrace stairs are also consistent with the established and successful design precedents of other national and international stadia which have been proven to successfully enable major pedestrian movements safely and effectively. These include the Victor Trump Stand at the SCG, AAMI Park (Melbourne Rectangular stadium), Suncorp Stadium (Brisbane stadium), Optus Oval (Perth stadium), Etihad Stadium (Docklands Melbourne stadium), Cape Town Stadium, and Emirates Stadium (Arsenal stadium in London).</li> <li>• The stairs on the Driver Avenue frontage of the site are necessary to overcome the significant topographical change of this site and provide an enhanced interface with residential areas to the north. Elevating the stadium entry on Driver Avenue enables the public domain level to tie seamlessly with the northern site boundary and the Moore Park Road public domain, which is a significant urban design and access improvement compared to the existing situation which will improve accessibility and movement throughout the stadium precinct. This improves pedestrian amenity and permeability from Moore Park Road and enables delivery of the proposed active and passive recreation areas at Busby's Corner and Fig Tree Place which would not be possible if this frontage were replaced with stairs.</li> <li>• The public domain levels also ensure that site excavation is minimised where possible, protecting subterranean heritage items and possible relics and ensuring the proposed development does not impact on the groundwater table.</li> </ul>	
	<p>The provision and design of adult changing places within the stadium.</p>	<p>As noted in a number of the submissions, the proposal will provide adult changing places and other enhancements to cater for different user groups such as unisex toilets, prayer rooms and parenting rooms. A key objective of the redevelopment has been to deliver a stadium that is accessible to a diverse range of people with different ages, backgrounds, gender, and mobility, which were not adequately provided in the previous stadium.</p> <p>The detailed design of these facilities will be confirmed and further developed prior to the issue of the relevant Construction Certificate. All proposed adult change rooms/facilities will be designed and constructed in accordance with applicable Australian Standards and best-practice.</p>	-
	<p>The detailed design of public domain features such as raised lettering or brail on signage, tactile markers etc.</p>	<ul style="list-style-type: none"> <li>• The revised Landscape and Public Domain Plans confirm that tactile markers will be included at the top and bottom of stairs.</li> <li>• Planting has been incorporated into the top of all seating terraces as natural indicators.</li> </ul>	<b>Appendix C</b>



Issue tag	Summary of issue	Response	Reference to information
		<ul style="list-style-type: none"> <li>Other detailed design measures, such as raised lettering, brail on signage and the like will be pursued when developing the detailed construction plans for the proposed development.</li> <li>The mitigation measures have been updated to reflect this commitment, and a suitably worded condition could be imposed to further reinforce this requirement if considered appropriate.</li> </ul>	
<p><b>Bulk, scale, and architectural design</b></p>	<ul style="list-style-type: none"> <li>The bowl roof form will increase the building height of the stadium to the east and west, which is dominating and out of character with the area. The current design is incompatible with the locality and is a disproportionate increase in bulk and scale.</li> <li>There will be limited additional public seating in the new stadium to justify the size of the building.</li> </ul>	<p>Whilst the depth and height of the eastern and western grandstands are greater than the former stadium, they are contained within the approved building envelope and will not result in any significant or adverse environmental impacts. The ultimate architectural design of the stadium responds to the unique context of the site and provides a sensitive and appropriate built form.</p> <ul style="list-style-type: none"> <li>The proposal will continue to be visible from Kippax Lake in Moore Park, which is considered to be acceptable as the proposal will simply replace the stadium that is a prominent feature of this view, and will not impact on the more scenic vantage points from Moore Park to the Sydney CBD. The roof form is curved and streamlined to ameliorate visual impact to the western and eastern interfaces.</li> <li>The proposal does not impact on key views from Centennial Park and other surrounding parks, including Sydney Park and the Mount Steele Lookout, in which instance the proposed stadium is either not visible or continues to form part of the urban view and is of a lesser scale than the approved maximum building envelope.</li> </ul> <p>The visual impact from Moore Park Road has been considered and minimised through intentionally lowering the stadium's northern facade to mitigate visual bulk and scale, and by pushing the stadium footprint to the south west to increase the space and landscaping between the stadium and Moore Park Road. Street trees will be maintained and supplemented along this frontage to better integrate the stadium with its surroundings and ensure the landscaped foreground from Moore Park Road remains.</p>	<p><b>Appendix L</b> and the Design Report at <b>Appendix B</b></p>
	<p>The building will dominate vistas from Moore Park and Paddington.</p>	<p>A Visual and View Impact Assessment was submitted at Appendix W of the EIS. The assessment considered 23 public views and 8 key residential views and concluded that the detailed design of the stadium had an acceptable visual impact, and that the majority of existing views would remain largely unchanged or result in a negligible or minor visual impact.</p>	<p>Appendix W of the EIS and <b>Appendix L</b></p>
<p><b>Flora and fauna impacts</b></p>	<p>The proposed development poses a threat to the tranquillity and wildlife of Moore Park and Kippax Lake. Monitoring of the water of Kippax Lake is recommended to prevent construction impacts.</p>	<p>A Biodiversity Development Assessment Report (BDAR) was prepared by Jacobs and submitted with the Stage 1 DA. This assessment confirmed that the proposed development would not adversely impact ecology or wildlife in the surrounding area. It also concluded that the proposed development should provide replacement planting, including species suitable for foraging</p>	<p><b>Appendix K</b> and Appendix EE of the EIS</p>

Issue tag	Summary of issue	Response	Reference to information
		<p>by the Grey-headed Flying-fox, and an artificial microbat roost structure in the significant fig trees fronting Moore Park Road. These recommendations were incorporated into the Landscape Plans exhibited with the Stage 2 EIS. The Department and NSW Office of Environment and Heritage waived the requirement to prepare a Stage 2 BDAR based on these findings.</p> <p>A further assessment by Jacobs confirmed that noise and light associated with the operation of the new stadium would not have any long-term or detrimental impacts on Grey-Headed Flying Foxes, water birds or other fauna around Kippax Lake, and would not be notably different to that experienced by the former stadium.</p> <p>The protection of Kippax Lake during the construction process can be managed through appropriate sediment and erosion control measures to prevent runoff from the site and dust monitoring. Such measures have been assessed in the technical studies accompanying the EIS, and have been incorporated into the Mitigation Measures for the project.</p>	
	Tree removal to accommodate pedestrian access through Moore Park has not been justified.	No tree removal in Moore Park is proposed as part of this application.	-
	The application does not outline plans to replace lost trees.	The Landscape Plans detail the location and type of planting to be accommodated on the site including 117 new trees and understorey planting. Trees on the site are being replaced at a ratio of 3.3 new trees for every one removed, and will significantly contribute to landscaping on the site.	<b>Appendix C</b>
	The species of trees chosen should reference those in Moore Park.	The species of trees adopted in the Landscape Plans are primarily Australian Native species, many of which are endemic to the Eastern Suburbs Banksia scrub group. Fig Trees, which are a predominant feature of Moore Park and this area, have been incorporated into the landscaping scheme for the site to complement the significant Fig Trees retained in the north east and north west corner of the site.	<b>Appendix C</b>
	The project will result in a loss of green space.	<ul style="list-style-type: none"> <li>• The proposed development replaces a former stadium with a new stadium, utilising the same project area. This ensures the proposed development does not remove existing green space in the surrounding area.</li> <li>• Potential future works external to the site, such as the upgrades to the pedestrian connection around Kippax Lake, will be pursued as part of a separate and future process in consultation with relevant stakeholders.</li> </ul>	<b>Appendix C</b>
<b>Public transport</b>	A range of issues were identified with regard to the use, management and capacity of public transport when travelling to and from the site, which are summarised as:	The Green Travel Plan and Travel Management Plan were developed in consultation with Transport for NSW (TfNSW). The measures outlined in these documents demonstrate the Trust's commitment to creating a more	<b>Appendix J</b>

Issue tag	Summary of issue	Response	Reference to information
	<ul style="list-style-type: none"> <li>That the Green Travel Plan and Travel Management Plan do not discourage people from using private vehicles and maximising the use of public transport.</li> </ul>	<p>sustainable and resilient stadium, with improved operations that reduce the impact on the local and wider environment.</p> <p>It is also worth noting that since public exhibition, Infrastructure NSW has met with TfNSW on three occasion to discuss travel demand and management to and from the proposed stadium. During these meetings, TfNSW reiterated its commitment to working with Infrastructure NSW on the development of the final Green Travel Plan to ensure the most effective operational initiatives are identified and implemented to support sustainable transport options to and from the stadium. The Mitigation Measures have been updated to reflect this commitment, and a suitably worded condition could be imposed to further reinforce this requirement if considered appropriate. The Detailed Response to Agency and Public Submissions at <b>Appendix A</b> and the updated Transport Assessment at <b>Appendix J</b> provide further details.</p>	
	<ul style="list-style-type: none"> <li>There is no action plan for achieving stretch targets and no timeline.</li> </ul>	<ul style="list-style-type: none"> <li>The Green Travel Plan will be reviewed and updated periodically in line with the monitoring mechanisms outlined in the document.</li> <li>Infrastructure NSW and TfNSW have been working together since public exhibition as outlined in the Detailed Response to Agency and Public Submissions at <b>Appendix A</b>, and the updated Transport Assessment at <b>Appendix J</b>.</li> <li>The mitigation measures have been updated to reflect the ongoing commitment to finalise the Green Travel Plan, and a suitably worded condition could be imposed to further reinforce this requirement if considered appropriate.</li> </ul>	<p>Section B3.2 of the Transport Assessment at Appendix H of the EIS, and <b>Appendix J</b></p>
	<ul style="list-style-type: none"> <li>Additional public transport services need to be operated to meet additional demand.</li> </ul>	<p>Additional transport services are often run to meet additional demand. As TfNSW has carriage of providing public transport services. During events at the stadium and the broader precinct, additional transport services are often run to meet additional demand. As outlined in the Transport Assessment at Appendix H of the EIS and the updated Transport Assessment at <b>Appendix J</b>:</p> <ul style="list-style-type: none"> <li>Sydney Trains often provides additional services, particularly for intercity Services, during major events at Moore Park. When there is scheduled track work that impact services in the CBD, TfNSW operates additional bus services from Moore Park to locations such as Wynyard or rail replacement buses.</li> <li>Event shuttle bus services will continue to operate for events even after the light rail is completed depending on the nature of the event.</li> <li>Coaches will continue to use Moore Park Road and the southern end of Driver Avenue on event days to drop off and pick up passengers.</li> </ul>	<p>Section 7.3 and A1.7 of the Transport Assessment at Appendix H of the EIS, and <b>Appendix J</b></p>

Issue tag	Summary of issue	Response	Reference to information
		<ul style="list-style-type: none"> <li>Light rail capacity will also be calibrated depending on the type of event to be held at Moore Park (or Randwick Racecourse).</li> <li>Further opportunities for taxis (and rideshare) services have, and will continue to be explored to identify areas capable of accommodating these vehicles prior to and/or after an event.</li> </ul>	
	<ul style="list-style-type: none"> <li>The reduction in the use of special event buses will have the opposite effect envisaged. The forecast mode share indicates there will be a switch from special event buses to light rail, rather than a significant increase in patrons arriving by public transport as a whole.</li> </ul>	<p>The forecast mode share for events has been updated at <b>Appendix J</b> and agreed in principle by TfNSW. This revised mode share reconsiders the allocation of special event buses running prior to the start of concerts (noting they will be provided by TfNSW depending on the concert/event type) and the number of people driving to a concert with that driving to a major double header.</p>	<b>Appendix J</b>
	<ul style="list-style-type: none"> <li>Integrated ticketing to encourage public transport use is essential to achieving goals.</li> </ul>	<p>Integrated ticketing is subject to discussions between individual clubs and TfNSW, and currently applies to all NSW Waratahs and Sydney FC games. Other codes are required to negotiate the terms of integrated ticketing directly with TfNSW, noting that these negotiations are outside of the direct control of the SCSG Trust.</p>	-
<b>Project need</b>	<ul style="list-style-type: none"> <li>Justification for the redevelopment has not been demonstrated, including whether the refurbishment option would have resulted in a preferred outcome.</li> </ul>	<p>The project is consistent with the State Government's endorsed Stadia Strategy and the strategic planning framework for NSW. The justification for the redevelopment has also been demonstrated in the approved Concept Proposal SSD DA (9249), which established the overarching planning framework for the site, and which concluded that the Department and the Minister (as the consent authority) was satisfied that the proposal was justified in relation to the functional improvements to the stadium and site. Functionally, there were issues with the former stadium that prohibited the stadium from operating as a modern facility that met the basic needs as well as user expectations in attending a large-scale sporting event. Ultimately, consent was granted to the demolition of the stadium to proceed with the SFS redevelopment.</p> <p>The Stage 2 SSD DA that is the subject of this Report represents the next stage in realising the vision for the site established under the approved Stage 1 DA. As discussed in Sections 1.2 and 1.5 of the EIS, there is an inherent need for the proposal which represents the best possible outcome for the site.</p>	<p>State Significant Development Assessment Report (SSD 9249)</p> <p>Sections 1.2 and 1.5 of the EIS</p> <p>-</p>
<b>Noise</b>	<p>The issues raised in relation to noise were largely in relation to operational noise, including:</p> <ul style="list-style-type: none"> <li>The project will result in increased noise impacts during events, impacting the amenity of the surrounding area.</li> </ul>	<p>The Noise and Vibration Impact Assessment included as Appendix X to the EIS, and revised at <b>Appendix F</b>, confirms that events on the site are capable of complying with the established noise limits for concerts and sporting events, and presents no additional or significant acoustic issues.</p>	<b>Appendix F</b>

Issue tag	Summary of issue	Response	Reference to information
		When compared with the former stadium, the new stadium will result in a reduction in noise levels of between 2dB and 10dB.	
	<ul style="list-style-type: none"> <li>Noise impacts will be worsened due to an increase in events.</li> </ul>	As no change is proposed to overall operation of the stadium, and the operation of the stadium presents no additional or significant acoustic issues, there will be no worsened or adverse acoustics impacts resulting from the operation of the proposed development.	-
	<ul style="list-style-type: none"> <li>The stadium should provide a full retractable roof to contain sound during events.</li> </ul>	The Noise and Vibration Impact Assessment confirms that the proposed stadium is capable of operating and hosting major events and concerts without resulting in adverse impacts. The provision of a retractable roof is not required in this instance to contain sound, or for weather proofing, and as such would contribute an unnecessary cost.	-
	The CMP/CEMP should explicitly address the issue of how high noise activities out-of-hours will be handled, including consultation with adjacent residents. It is unclear which body will approve (or reject) requests for high noise activities out-of-hours.	<p>Out of hours construction works would be specific to activities such as those nominated in Condition C7 of the Stage 1 approval, which nominates:</p> <ul style="list-style-type: none"> <li>activities by NSW Police or a public authority for the delivery of vehicles, plant or materials; or</li> <li>activities in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or</li> <li>activities where the works are inaudible at the nearest sensitive receivers; or</li> <li>activities where a variation is approved in advance in writing by the Planning Secretary of the Department of Planning, Infrastructure and Environment or nominee if appropriate justification is provided for the works.</li> </ul> <p>The above activities would not include any high-noise activities unless it met the specific circumstances above, such as the prevention of damages and harm. The notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards, recognising that the urgency of activities (such as preventing the loss of life) may not enable prior warning.</p>	-
<b>Expenditure</b>	Comments relating to the spending of taxpayer money, and alternative uses for funds.	The project expenditure decision is a matter for the NSW Government and is not relevant to the planning assessment process.	-
<b>Heritage</b>	<p>The primary concerns for heritage were tied to the bulk and scale of the building, and that it would dominate its context including:</p> <ul style="list-style-type: none"> <li>That significant increases in built form imposing on outlooks across heritage Paddington between the stadium and Oxford Street.</li> <li>The surrounding Paddington precinct is low rise and of heritage significance. The size of the stadium impacts the balance of this historic suburb and diminishes its beauty.</li> </ul>	<p>The Stage 1 DA considered heritage impacts and determined that a building of the scale now proposed was acceptable and would not result in adverse heritage impacts.</p> <p>The Heritage Impact Statement submitted as Appendix T of the Stage 2 SSD DA EIS confirms the following:</p> <ul style="list-style-type: none"> <li>The new stadium will remain visible from surrounding significant heritage items and conservation areas including the SCG to the south, Moore</li> </ul>	Section 7 of the Heritage Impact Statement at Appendix T of the EIS, and the revised plans at <b>Appendix B</b> .

Issue tag	Summary of issue	Response	Reference to information
		<p>Park to the west, and the Paddington Barracks and Conservation Area to the north. This is consistent with the views of the former stadium and the existing transition between the parklands and the sporting precinct. The new stadium has been designed to be sympathetic of and commensurate with the overall form, massing and general colour palette of the former stadium and adjoining SCG to ensure views from heritage conservation areas not impacted.</p> <ul style="list-style-type: none"> <li>• The selected materiality and colour directly responds to the historic setting of the stadium, through the subtle yet intentional references to heritage fabric and materiality.</li> <li>• The design intentionally reduces the roof height of the stadium as visible from the northern and southern approaches (including the Paddington Heritage Conservation Area) compared to the approved building envelope, in order to reduce the visual impact of the stadium from these significant views.</li> </ul> <p>As discussed in <b>Section 4</b> below, the stadium has been further reduced in scale and expanse in response to the submissions, including reducing the overall extent of the roof by between 4m-5m in width (in plan form) and between 2m-2.5m in height (to the outer edge). This further reduces the bulk and scale of the proposal.</p>	
	<ul style="list-style-type: none"> <li>• The Heritage aspects of Kippax Lake and Moore Park, including the Moore Park Conservation Area, are not addressed.</li> </ul>	<p>The Heritage Impact Statement submitted as Appendix T of the EIS assesses the impact of the proposal on the Moore Park Conservation Area and Moore Park (including Kippax Lake) as an item of heritage significance.</p>	<p>Section 4.3.1 and Section 7 of the Heritage Impact Statement at Appendix T of the EIS.</p>
	<ul style="list-style-type: none"> <li>• Site excavation and the construction of the stadium will impact on Busby's Bore.</li> </ul>	<p>Busby's Bore is located outside of the excavation zone, within an area of the site that is to be nominally filled rather than excavated. It will, therefore, remain protected as is without any direct physical impacts.</p> <p>Further, construction works to occur on the site will be informed by the <i>Methodology Statement – Working Near Busby's Bore</i> (submitted as Attachment 8 of the Response to Submissions Report for the Stage 1 DA), and the <i>Archaeological Research Design and Excavation Methodology</i> report (submitted at Appendix T of the EIS). These assessments have determined the potential impacts from construction works occurring in the vicinity of Busby's Bore and established a methodology for undertaking such works to minimise the risk of structural damage to the shafts or tunnels. These include a physical exclusion zones around the existing known shafts, potential shaft locations, and the location of the Bore tunnels, and the use of vibration monitoring devices within the shafts to provide real-time alerts.</p>	<p>-</p>

Issue tag	Summary of issue	Response	Reference to information
	<ul style="list-style-type: none"> <li>Further consultation including with residents, National Trust, and Heritage Council should be completed before interpretative elements are finalised.</li> </ul>	<p>Heritage interpretation measures on the site will be coordinated with the site-specific public art panel established to review the procurement of public art, comprising representatives from Infrastructure NSW, the appointed design team, the SCSG Trust, and the City of Sydney Council's own public art advisory panel. They will also be subject to further consultation with the La Perouse Local Aboriginal Lands Council, in order to seek input into the plan with regard to Aboriginal cultural heritage significance.</p>	<p>Final Mitigation Measures in <b>Section 6</b></p>
<p><b>Number of events and duration</b></p>	<ul style="list-style-type: none"> <li>Respite needs to be provided to adjacent residents from continuing anti-social behaviour from patrons. Conditions of consent need to cap double-header, concerts and events at the stadium.</li> </ul>	<p>For the reasons discussed <b>Section 5.2</b> below and in the Addendum Social and Economic assessment at <b>Appendix M</b>, it is not considered necessary or appropriate to cap events on site as the impacts of stadium operation are acceptable from an environmental impacts perspective with the Final Mitigation Measures (Section 6.0) and standard conditions of consent.</p> <p>The amenity considerations (noise, traffic, etc) have all been demonstrated to occur within the accepted criteria, year-round irrespective of the type or scale of event.</p> <p>In addition, the Anti-Social Behaviour Strategy submitted as Appendix R of the EIS provides a new layer to venue management and has been developed in collaboration with NSW Police. The Strategy was not in place under the former stadium, and therefore represents an additional management layer to address and mitigate anti-social behaviour. In implementing this Strategy, the SCSG Trust has committed to continuing to work with the NSW Police through the sharing of information, good practice skills and experiences, training of staff, and coordinating with relevant agencies to provide support. The implementation of these procedures and policies, which would be embedded in any development consent, represents a significant improvement to the way in which the operation of the stadium is managed compared to the previous stadium. By better managing the potential effects of events, the stadium will be able to ensure that cumulative impacts are acceptable and can be appropriately managed without the need for more stringent controls such as a cap on events.</p>	<p><b>Appendix M, Section 5.2</b> of this report, and further responses in the table at <b>Appendix A</b></p>
	<ul style="list-style-type: none"> <li>The lack of any cap on the number of events and the scope for these to increase in number means the disruption to local traffic and the demand for on-grass parking can only increase.</li> </ul>	<p>No cap applied to the number of sporting events able to be hosted at the former stadium and this approach is proposed to continue for the new stadium. The 49-52 events per year assumption documented in the Stage 1 DA was an average event frequency informed by historical use of the former stadium and other stadia. Importantly, it was not a specific minimum or maximum. In this context, the Stage 2 SSD DA that is the subject of this report does not propose to 'increase' the number or scope of events given there is currently no cap in place. The proposed new stadium will continue to adhere to the same operating hours and restriction on the maximum number of concerts as has been the case to date. The proposed</p>	<p><b>Section 5.2</b></p>

Issue tag	Summary of issue	Response	Reference to information
		<p>development also does not prevent or otherwise impede the planned removal of parking on Moore Park as managed by the CPMP Trust.</p> <p>Furthermore, the exhibited EIS and this Response to Submissions (including all supporting appendices) have demonstrated that there are no unmanageable impacts that would warrant a capping of events. All operations will occur within the identified limits and no criteria are expected to be exceeded. The EIS and Response to Submissions collectively demonstrate that operational impacts will occur within industry and regulatory standards, and/or will be managed through conditions of consent and management plans which will need to be prepared in consultation with, and approved by, the relevant authorities. The Department's standard conditions of consent will undoubtedly contain monitoring and compliance requirements, ensuring Infrastructure NSW and the SCG Trust will be obliged to demonstrate that the stadium is being operated wholly within the terms of the consent.</p> <p>Accordingly, no change is warranted to the existing arrangements for car parking or the number of events hosted by the stadium beyond that for which consent is being sought.</p>	
	<ul style="list-style-type: none"> <li>The maximum of 6 concerts identified is incorrect and not what is specified in the Noise Prevention Notices applying to the site.</li> </ul>	<p>Mitigation Measure D/O-O1 in the exhibited EIS specifies that the maximum number of concerts hosted at the site is not to exceed 6 concerts per calendar year. As part of the Response to Submissions, Mitigation Measure D/O-O1 has been revised to make clear that this also incorporates the requirement that the number of concerts does not exceed an average or 4 per year over a rolling 5-year average across both the SFS and SCG. This is consistent with the operation of the former stadium and Condition C9 of the Concept Proposal.</p>	-
	<ul style="list-style-type: none"> <li>The hours of operation till 11pm are also too onerous in a residential area.</li> </ul>	<p>The stadium is located within a State-significant sporting event precinct which has a history of sporting use dating back more than a century. No change is proposed to the hours of operation for the site, which are consistent with the long-standing operations of the former stadium.</p>	Section 4.9.1 of the EIS
<b>Pedestrian access and pathways</b>	<ul style="list-style-type: none"> <li>Pedestrian links should be provided to connect the stadium to the light rail and surrounding areas</li> </ul>	<p>The stadium has been designed with regard to public domain improvements occurring in the surrounding area and where additional benefits can be delivered by Infrastructure NSW and the SCSG Trust. More specifically:</p> <ul style="list-style-type: none"> <li>A new 6m wide pathway will connect the new light rail stop adjacent to Moore Park with Driver Avenue, and is being constructed by TfNSW as part of the CBD and South East Light Rail project.</li> <li>A potential pedestrian link between the Tibby Cotter Bridge and the stadium around Kippax Lake. This link was envisaged in the adopted <i>Sydney Football stadium Urban Design Guidelines</i> and will be discussed</li> </ul>	-



Issue tag	Summary of issue	Response	Reference to information
		with the CPMP Trust. At a recent CCC meeting, Infrastructure NSW was advised that the new link could take the form of intuitive design through planting or other mechanisms rather than a constructed path. The design of potential upgrades is, therefore, being worked through as part of a separate process. This commitment has been included in the updated Mitigation Measures to progress consultation with the CPMP Trust regarding this link.	
	<ul style="list-style-type: none"> <li>Reference to a six-metre wide pedestrian footpath connecting the Tibby Cotter Bridge, the new light rail stop and Driver Avenue will encroach on much needed recreation space.</li> </ul>	The pedestrian pathways connecting key transport nodes and paths of travel are necessary to enable efficient, safe access. The pathway connecting Driver Avenue to the light rail is being delivered by TfNSW and as such is outside the control of Infrastructure NSW and the SCSG Trust. The potential upgrades to the connection between the Tibby Cotter Bridge and the stadium will be detailed in consultation with the CPMP Trust to complement the existing pedestrian network and to minimise impacts on existing turf areas in consultation with the CPMP Trust. Intuitive design options are being explored including planting or other mechanisms to assist wayfinding and pedestrian movements.	-
	<ul style="list-style-type: none"> <li>Pedestrian capacity modelling should extend to the capacity of the Driver Avenue steps to accommodate crowds exiting the stadium.</li> </ul>	The Moore Park Terrace steps have been designed to comply with the relevant Australian building regulations and codes, and the recommendations of the Sports Grounds Safety Authority's <i>Safety in Design of Sports Grounds</i> publication. They are also consistent with the design response of other national and international stadia which have been proven to successfully enable major pedestrian movements safely and effectively – refer to <b>Section 5.3</b> .	Entry Stairs Analysis at <b>Appendix B</b>
<b>Cycling access and parking</b>	<ul style="list-style-type: none"> <li>Bicycle racks should all be located on SCG Trust land and not within Moore Park.</li> </ul>	The bicycle parking racks on the western side of Driver Avenue were identified as a possible option to be discussed with the CPMP Trust and would be subject to future design and consultation. The SCSG Trust is committed to working with the CPMP Trust to determine a final location for the proposed 30 racks (60 bikes), post approval, and in the context of other initiatives external to the site that are to be finalised (including wayfinding and the pedestrian link/connection around Kippax Lake).	Revised Landscape Plans at <b>Appendix C</b> and <b>Appendix J</b> of this report.
	<ul style="list-style-type: none"> <li>Secure bicycle parking needs to be provided for patrons as well as staff and patrons of the stadium gym/pool/squash courts/leisure centre/cafes that will be included in the stadium complex.</li> </ul>	24/7 accessible bicycle parking has been provided for the general public in the public domain surrounding the stadium, to ensure it is available at all times for use. This parking is anticipated to be utilised by event patrons, and is also capable of accommodating those persons seeking to use other facilities in the precinct.	Revised Landscape Plans at <b>Appendix C</b> and <b>Appendix J</b> of this report.
	<ul style="list-style-type: none"> <li>End of trip facilities need to be provided to complement parking.</li> </ul>	End of trip facilities are provided for staff in the stadium basement including bathrooms, changerooms, showers and lockers.	<b>Appendix B</b>

Issue tag	Summary of issue	Response	Reference to information
	<ul style="list-style-type: none"> <li>It is critical that the Moore Park Road cycle path be constructed before the opening of the new stadium.</li> </ul>	<p>The new two-way separated cycleway along the complete length of Moore Park Road is being designed and delivered by City of Sydney Council. The timing for this new cycle path is outside of the direct control of the SCSG Trust and Infrastructure NSW.</p>	<p>Section 5.5 of Appendix H of the EIS</p>
<p><b>Wayfinding, signage and media screens</b></p>	<ul style="list-style-type: none"> <li>Television screens adjacent to Moore Park are inappropriate.</li> </ul>	<p>No external television screens are proposed as part of the development. Some discrete digital wayfinding and information signage is proposed to assist patrons navigation through the site.</p>	<p>Appendix I of the EIS</p>
	<ul style="list-style-type: none"> <li>Wayfinding signage in the stadium precinct should be consistent in presentation and content with those in all areas where pedestrians approach the stadium</li> </ul>	<p>The majority of signage on the site has been designed with reference to the adopted styles used by City of Sydney Council and the CPMP Trust, implementing tried and tested wayfinding systems and reinforcing the 'public' look and feel of the new public domain areas surrounding the site.</p>	<p>Appendix I of the EIS</p>
	<ul style="list-style-type: none"> <li>It is not enough to simply show blank space where the LED digital display goes. The strategy should include rules and guidance over the content of digital signage.</li> </ul>	<p>The State-wide planning controls dictating signage design confirm that the controls do not regulate content and do not require consent for a change in content. Notwithstanding, the proposed digital screens are intended to be used to display messages/images for wayfinding and other information including opportunities for public art and heritage interpretation.</p>	<p>-</p>
	<ul style="list-style-type: none"> <li>The strategy should consider negative impacts from signage clutter and include ways to prevent this. For example, having a range of mounting options besides poles in the ground, and guidelines over gaps between posted signs to encourage more bundling of signage.</li> </ul>	<p>The proposal establishes a rationalised and coordinated approach to wayfinding signage within the public domain, and with reference to signage in the greater precinct, ensuring that the proposal does not contribute to visual clutter. The Wayfinding and Signage Strategy submitted at Appendix I of the EIS included an Audit of existing signage and wayfinding elements within the Moore Park precinct and along key pedestrian routes to and from the site. This Audit informed the design and placement of signage within the site, which has also been coordinated with the proposed public domain.</p>	<p>Section A of Appendix I of the EIS</p>
	<ul style="list-style-type: none"> <li>The signage proposed is excessive.</li> </ul>	<p>The signage indicated in the Wayfinding and Signage Strategy submitted at Appendix I of the EIS is comprehensive and ensures the early consideration and incorporation of wayfinding and identification signage into the design of the public domain and stadium. Given the nature of the proposed development, which is a significant piece of government infrastructure, and the importance of wayfinding and communication to the successful operation of this infrastructure, the proposed signage is appropriate for the site and its intended use. This includes markers for stadium entrances and gates, vehicle entrances, directional signage for travelling into and out of the site and within the concourse, signage indicating accessible paths, bicycle parking, heritage interpretation markers and panels. The Wayfinding and Signage Strategy will be finalised post approval, as agreed with TfNSW.</p>	<p>Section 5 of Appendix I of the EIS</p>
<p><b>Rideshare and point-to-point</b></p>	<ul style="list-style-type: none"> <li>With the rise of ridesharing, there needs to be an increased number of clearly identifiable ride-share zones as well as taxi ranks. Traffic</li> </ul>	<p>Further opportunities for taxis and rideshare services was explored in the Transport Assessment prepared by Arup that accompanied the EIS at Appendix H. These included opportunities for pick up/drop off using the</p>	<p>Section 8 of Appendix H of the EIS and</p>

Issue tag	Summary of issue	Response	Reference to information
	<p>flow through the precinct is impacted by a lack of formal ride-sharing arrangements.</p> <ul style="list-style-type: none"> <li>The identified taxi ranks would impact traffic moving out of this area.</li> </ul>	<p>northern kerbside of Moore Park Road, and the southern kerbside of Moore Park Road, which operate as clearways during events and informally for taxis and rideshare vehicles at other times. An existing 'no-stopping' zone on the northern kerbside of Lang Road between the Equestrian Centre and Cook Road has also been identified by TfNSW as a potential drop off and pick up zone.</p> <p>Since exhibition, Infrastructure NSW has entered into preliminary discussions with TfNSW regarding these nominated zones and other management measures such as a 'geo-fence' similar to that employed at the BankWest stadium. The finalisation and implementation of any taxi or rideshare zone will be pursued separately to this application in consultation with key stakeholders, and will assess any impacts to traffic movements.</p>	<p><b>Appendix J</b> of this report.</p>
<p><b>Security and anti-social behaviour</b></p>	<ul style="list-style-type: none"> <li>Proposal has not developed solutions to address fan behaviour in residential areas.</li> </ul>	<p>Solutions to manage and mitigate fan behaviour are outlined in the Anti-Social Behaviour Strategy submitted as Appendix R of the EIS. This Strategy was developed with the NSW Police, and in implementing the Strategy the Trust has committed to continuing to work with the NSW Police through the sharing of information, good practice skills and experiences, training of staff, and coordinating with relevant agencies to provide support. The implementation of these procedures and policies, which would be embedded in any development consent.</p>	<p>Appendix R of the EIS</p>
	<ul style="list-style-type: none"> <li>Safety concerns at the main stairway entrance/exit in regards to large crowds entering and exiting the stadium in circumstances where they are trying to do so in emergency situations or where people are intoxicated or pushing to exit quickly. This could result in crowd crush and falls and therefore injury.</li> </ul>	<p>As discussed, the proposed stairs are designed to achieved relevant design and safety standards and are comparable to those used at other national and international stadia, which are proven to successfully enable major pedestrian movements safely and effectively. Intoxication and other Anti-Social Behaviour will be managed and mitigated through the measures imposed in the Anti-Social Behaviours Strategy, which includes measures for the responsible service of alcohol.</p>	<p>Entry Stairs Analysis at <b>Appendix B</b> and Appendix R of the EIS</p>
	<ul style="list-style-type: none"> <li>The behaviors are not just anti-social but illegal (public urination, vandalism, littering). The SCGT should pay to have police patrols between Moore Park and Oxford Street on event days to deter this behavior.</li> </ul>	<p>International evidence demonstrates that it is possible to employ practices and mitigation measures that respond to anti-social behaviours and effectively minimise occurrences. In reducing the prevalence of such behaviours, the risk and threat to the community is also removed and perceptions of safety are increased. The overall aim of the Anti-Social Behaviour Strategy is therefore to identify likely anti-social behaviours and recommend appropriate mitigation measures that will ensure people are safe and feel safe when attending events at the SFS. The development of this Strategy has involved close consultation with the NSW Police to ensure the framework proposed for tackling anti-social behaviour is appropriate.</p>	<p>Appendix R of the EIS</p>

### 3.1 Submissions by agencies

Submissions were received from 15 public agencies during the exhibition of the EIS, including:

- Transport for NSW;
- City of Sydney Council;
- Randwick City Council;
- Waverley Council;
- Heritage Community Engagement, Department of Premier and Cabinet (Heritage Council of NSW);
- Botanic Gardens and Centennial Parklands (Centennial Park and Moore Park Trust);
- NSW Environment Protection Authority;
- Sydney Water;
- Civil Aviation Safety Authority;
- Sydney Airport Corporation Limited;
- Transgrid;
- Ausgrid;
- Department of Defence (Commonwealth);
- NSW Police Force; and
- Fire and Rescue NSW.

The DPIE letter requesting additional information was supplemented by separate requests from the former Department of Industries – Land and Water division and the former Office of Environment and Heritage. Feedback from these particular stakeholders was forwarded to Infrastructure NSW for consideration and response during the preparation of this Report. These requests have not been uploaded onto the DPIE's website as submissions made during the statutory consultation process.

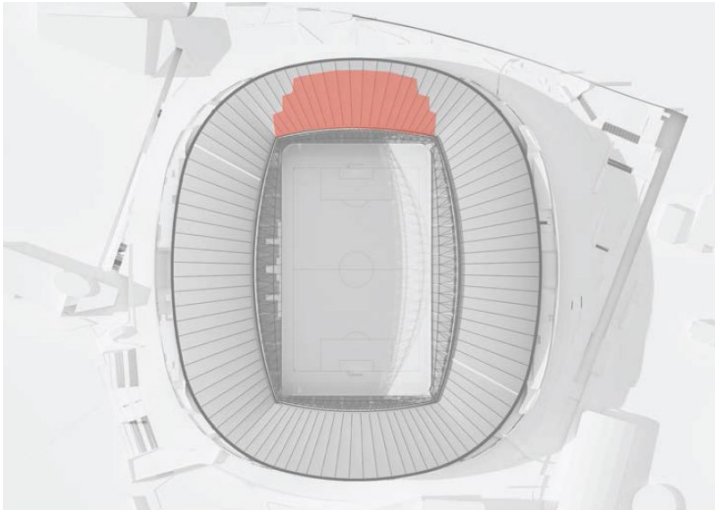

With the exception of the City of Sydney Council, none of the agencies objected to the SSD DA. A detailed response to each of the issues raised in these submissions is provided at **Appendix A**. An assessment of the key issues and of the proposed design changes is also included in **Section 5.0** below.


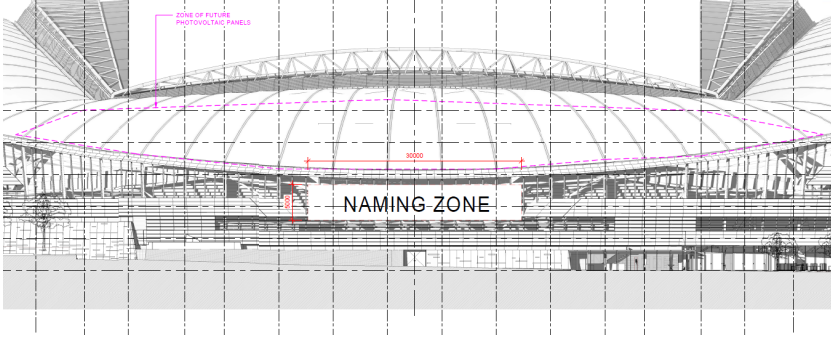
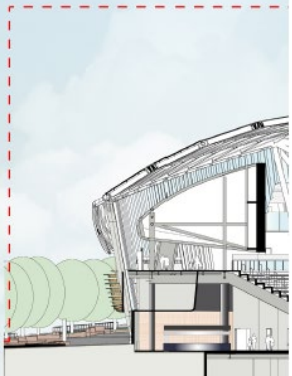


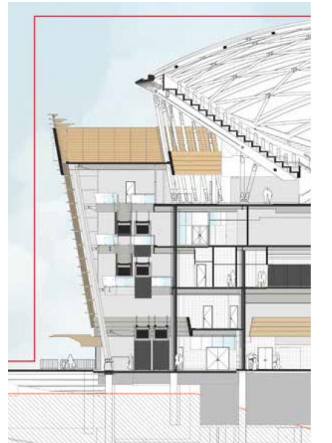
## 4.0 Amendments to the application

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 accordance with Section 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). These changes have occurred 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 and Landscape and Public Domain Plans at **Appendix B** and **C** respectively. These design changes are described below and, where relevant, assessed in **Section 5.0** of this report and the accompanying technical assessments.

The changes to the proposal are described in **Table 3** below.

**Table 3 Key amendments to the application**

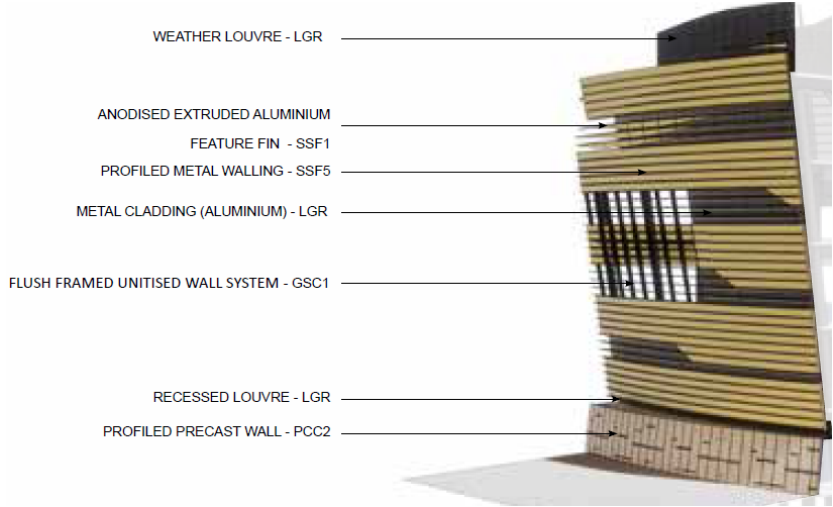
Description	Illustration
<p>Changes to the roof, comprising:</p> <ul style="list-style-type: none"> <li>Replacing the single skin EFTE membrane areas on the northern part of the roof, with translucent PTFE. Detailed daylight analysis confirmed that the EFTE membrane offered little benefit for pitch illumination and grass growth in this location, and as such alternative translucent materials could achieve the same desired effect. The single skin EFTE membrane in a ring on the inside edge of the roof has been maintained.</li> </ul>	
<ul style="list-style-type: none"> <li>Reducing the overall extent of the roof by 5m to the north and south and 4m to the east and west (in plan form), through removing the 'skirt' on the underside of the roof. This benefits the overall bulk and scale of the roof.</li> </ul>	

Description	Illustration
<ul style="list-style-type: none"> <li>Replacing the diagrid 'diamond' roof pattern and structure with a quad 'shell' roof pattern and structure supported by a tension ring truss, retaining a textured and visually interesting finish.</li> </ul>	
<ul style="list-style-type: none"> <li>Consolidating the photovoltaic array on the northern section of the roof, integrating the array with that portion of the roof that is lower in height, whilst still also maximising solar access and therefore potential energy production.</li> </ul>	
<ul style="list-style-type: none"> <li>Whilst the maximum stadium height remains the same (RL 85m), the outer edges of the stadium roof are reduced by approximately 2m on the northern and southern edges of the stadium, and 2.5m on the eastern and western edges of the stadium to reduce the perceived scale of the proposed development in response to the submissions received.</li> </ul>	<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;">  <p><i>Former design (north/south)</i></p> </div> <div style="width: 50%;">  <p><i>Proposed design</i></p> </div> <div style="width: 50%;">  <p><i>Former design (east/west)</i></p> </div> <div style="width: 50%;">  <p><i>Proposed design</i></p> </div> </div>

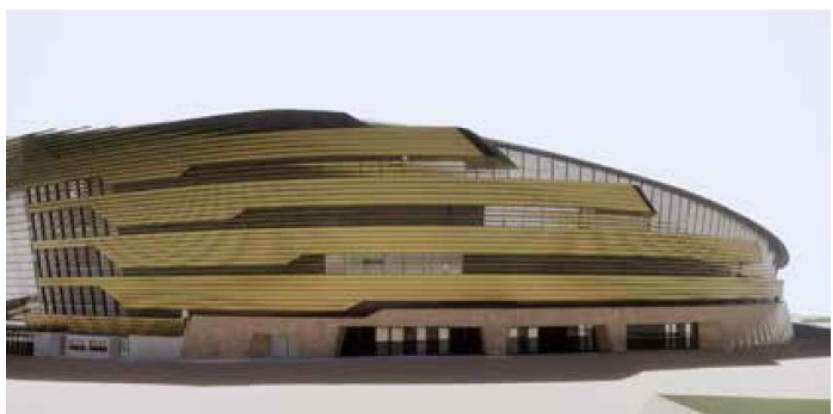
Description	Illustration
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Changes to the facade comprising:

- Integrating the louvred screens into the facade system and changing the colour of the aluminium louvres to a bronze metallic finish to better integrate with the surrounds.



- Constructing the textured base of the stadium in coloured and textured concrete in a sandstone colour, as shown in **Figure 4** below.

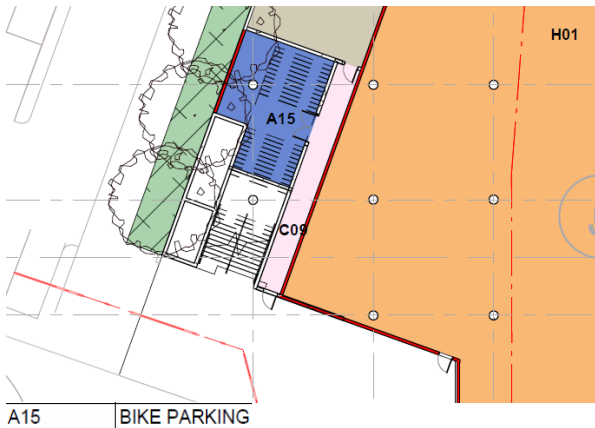


Internal changes to the stadium comprising:

- Removing landscaping from the inaccessible terraces on Levels 2, 3 and 4, and repurposing the accessible terraces on Level 5 as building plant areas.



- Relocating permanent staff bicycle parking from the basement to a new secure location under the stairs adjacent to the MP1 carpark, providing for 50 parking spaces.

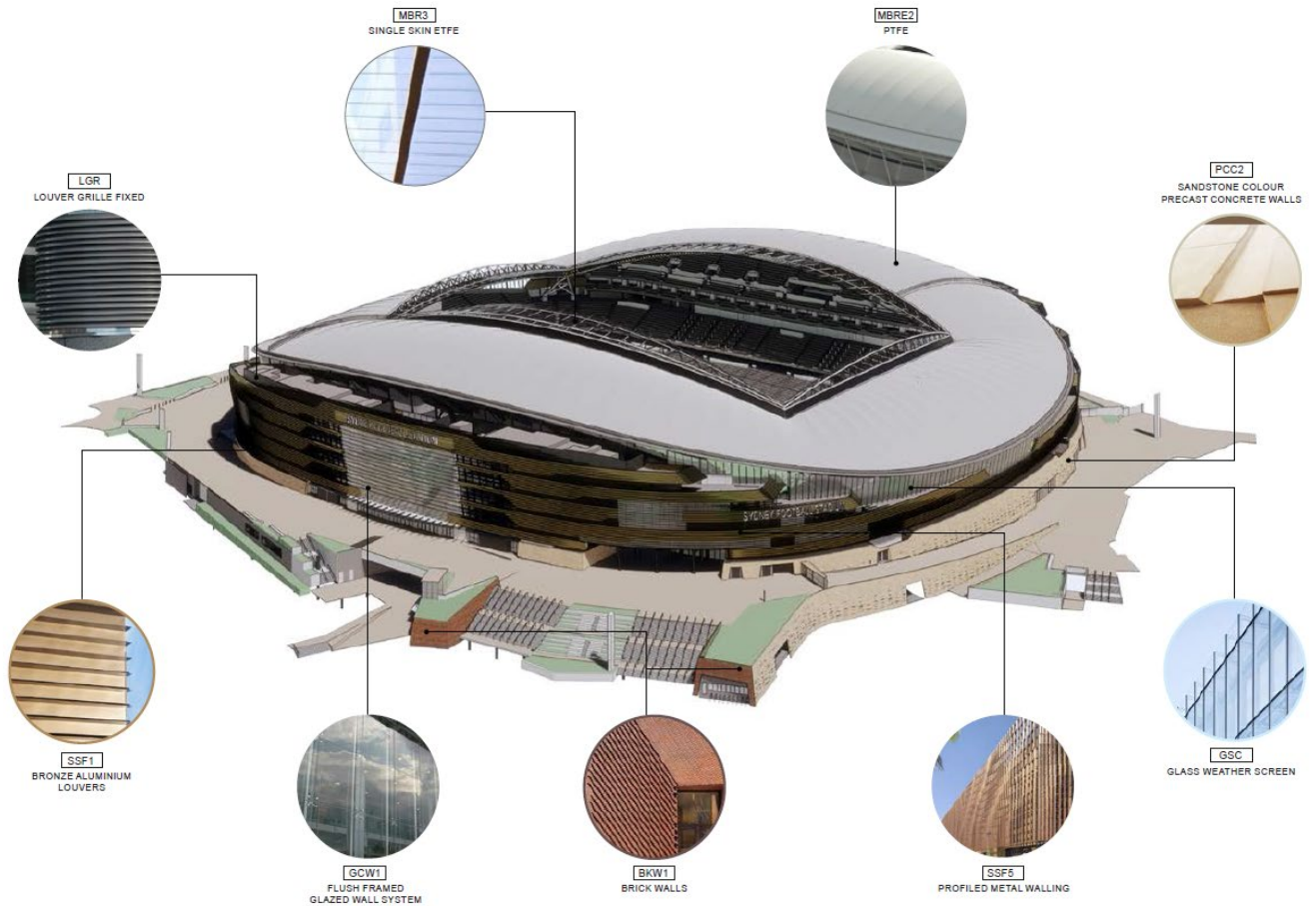


Description	Illustration
<p>Changes to the public domain comprising:</p> <ul style="list-style-type: none"> <li>Increasing the width of the entry stairs from Driver Avenue and rationalising the planting within this entry to ensure pedestrian flows are accommodated.</li> </ul>	
<ul style="list-style-type: none"> <li>Replacing the tree at the edge of the Driver Avenue entrance to the site with three trees in a revised location to resolve potential clashes with the newly diverted Sydney Water line running through the site, as provided for under MOD 2 to SSD 9249.</li> </ul>	
<ul style="list-style-type: none"> <li>Reducing the extent of stairs between the MP1 carpark and the external pedestrian concourse, and removing the redundant second stairway.</li> <li>Relocating the proposed planting on the western edge of the concourse, to the edge of the MP1 carpark, retaining the landscaped edge to the site whilst also allowing for better pedestrian flows within the concourse.</li> </ul>	



Description	Illustration
<ul style="list-style-type: none"> <li>Increasing the width of the entry stairs on the Moore Park Road entry to Busby's Corner to accommodate pedestrian flows.</li> </ul>	
<ul style="list-style-type: none"> <li>Providing additional planting on the eastern edge of the stadium for increased amenity in the public domain and increased privacy for Fox Studios.</li> <li>Reinstatement of the vehicle ramp with on-grade access on the eastern boundary of the site that is utilised by Fox Studios.</li> </ul>	
<ul style="list-style-type: none"> <li>Provision of a ramp in the southern corner of the site and the removal of some trees in this corner to accommodate pedestrian flows.</li> </ul>	

Description	Illustration
<ul style="list-style-type: none"> <li>Two (2) additional existing trees are proposed for removal to enable the proposed vehicle rejection loop, being Tree 301 and 302 within the MP1 carpark. Tree B on the Moore Park Road frontage of the site will also be retained as part of the proposed works.</li> <li>Overall revision of public domain planting and the geometry of planting, including at Fig Tree Place and Busby's Corner, with 117 new trees to be planted across the site representing a replacement ratio of 3.3 replacement trees for every one tree removed.</li> </ul>	



**Figure 4 Updated materials and finishes**

Source: COX Architecture

## 5.0 Clarification, additional information and further assessment

The following section should be read in conjunction with **Appendix A** and the relevant appendices of this report, which provides more detailed responses to matters raised by public agencies and the Department in response to the information and assessment provided in the EIS. The following sections address key aspects of those responses where additional information and/or assessment has been provided in support of that lodged with the EIS, including of the proposed design changes.

### 5.1 Design integrity

An amended Design Integrity Statement has been prepared to reflect the design changes made to the proposal in response to the submissions received and the design development occurring (discussed in **Section 4** above). The assessment compares the competition entry with the DA design and the post-lodgement design and provides an assessment as to whether the ultimate design scheme remains generally consistent and whether the scheme has altered the conclusion of the Design Integrity Panel in relation to design excellence.

The assessment at **Appendix P** confirms the Panel considers that the developments to the proposed design scheme are consistent with the competition design in relation to the requirements of the Design Excellence Strategy, relevant provisions of the Sydney LEP 2012, the objectives of *Better Placed*, and the project-specific Urban Design Guidelines. The assessment also confirms that these developments did not alter the Panel's conclusion that the design demonstrates design excellence.

As per the Design Excellence Strategy, the panel will continue to be involved during the design development process to safeguard the integrity of the winning design scheme, as the design is translated into the construction phase of the project.

### 5.2 Number of events

The Department has requested the Stage 2 development application estimate the number of events expected at the venue in the future and identify and assess all impacts of additional events and concerts in excess of 52 events per year including social and economic impacts, impacts on the built and natural environment in the locality, and impacts on environmental amenity.

#### Proponent's response

##### No sporting event restriction proposed

No restriction on the number of sporting events hosted at the stadium is proposed, consistent with the operation of the former stadium. The exception to this is the existing limitation on the number of concerts that may be hosted, which likewise is the same as the former stadium. Whilst the Concept Proposal and Business Case Summary predicted that the stadium may host in the order of 49-52 events per year, this was an assumed average based on the operation of the former stadium and other stadia and a predicted schedule of regular domestic and international fixtures, and importantly was not specified as a minimum or maximum number of events. This recognises that the number of events to be hosted at the stadium will fluctuate on a season-to-season and year-to-year basis to allow NSW to maintain and grow traditional regular sporting fixtures and attract one-off and emerging events. Along with factors such as the scheduling of international fixtures and the qualification of Sydney and NSW-based teams for finals or international tournaments, the stadium will seek to host international sporting matches and tournaments and special events over the course of its lifespan, which may result in hosting less than or greater than the Department's nominated 52 events per year.

##### Limit on events is inconsistent with the strategic framework

The redevelopment of the Sydney Football Stadium is a central component of the *NSW Stadia Strategy*, which seeks to concentrate government investment in major sporting infrastructure to ensure that the three Tier 1 stadia in Sydney (SCG, SFS and ANZ Stadiums) are capable of attracting and hosting major sporting events that generate the greatest social and economic returns for NSW. The objectives of the *Stadia Strategy* are as follows:

- ***Provide the community with increased access to stadia.***
- *Encourage multi-purpose usage of stadia.*
- *Improve facilities for participants and spectators.*

- **Improve the competitive position of NSW when attracting major events.** (our emphasis added)

Limiting the number of events would be directly contrary to these objectives by reducing the extent to which the new stadium can be used to host additional events for the community and by restricting the competitive position of NSW in attracting major events. The Stadia Strategy also sets out six design principles for stadia, of which 'Utilisation' is the second:

*“Utilisation – greater use of Tier 1 stadia will be prioritised. The aim will be to have an increased number of sport or entertainment event days held at stadia included in the Strategy”.*

Again, limiting the number of events would be directly contrary to this core principle of the *Stadia Strategy*, which has been the basis of the NSW Government’s investment decision for this project, by reducing the capacity to increase utilisation compared to the former stadium. Reducing the capacity to efficiently utilise the new stadium infrastructure would undermine the purpose of the investment in Tier 1 stadia.

Limiting the number of events would also have the potential to impact on the successful implementation of the NSW Government’s *Shaping the Future of Women’s Sport in NSW 2019-2023* strategy to build a stronger sport sector where women and girls are valued, recognised and have equal choices and opportunities to lead and participate in sport. At present, the majority of sporting content programmed at major stadia in NSW is associated with men’s sporting competitions (NRL, A-League, Super Rugby, international fixtures). Of the 49-52 base events that informed the business case for the stadium redevelopment, over 85% of these events involve regular men’s sporting fixtures. However, the *Shaping the Future of Women’s Sport in NSW 2019-2023* strategy seeks to support and grow emerging women’s sporting competitions which are expected to generate more events and attract larger crowds over time. Action 2.1 of *Shaping the Future of Women’s Sport in NSW 2019-2023* seeks to “improve places and spaces across the sport facility hierarchy” including to National and State-level stadia such as the Sydney Football Stadium, and the design for the stadium includes the provision of new facilities to better accommodate women’s sporting teams and female audiences, both of which were severely deficient in the former stadium. A limit on the number of events able to be hosted at the new stadium restricts the ability to host these emerging events, but which are likely to emerge over time and which can be directly supported through increased access to modern stadia.

Limit on events risks ability to attract major events

The NSW Premier recently announced an initiative of the NSW Government to attract 10 World Cups in 10 years to NSW in order to generate \$1 billion in additional visitor spend into the NSW economy. Whilst a number of these events will occur before the completion of the Sydney Football Stadium, this program of events (**Table 4**) highlights the critical role that modern rectangular stadia play in facilitating the attraction of major events. The Sydney Football Stadium would play a critical role in hosting those events requiring rectangular stadia following its completion, as well as in hosting major events not currently envisaged within this timeframe along with future events beyond the 2029 horizon. These major tournaments would largely occur in addition to already-scheduled domestic and international sporting fixtures for the stadium.

Limiting the number of events that are able to be hosted at the new Sydney Football Stadium would reduce the ability of NSW to successfully bid for and host major events, which would be additional to regular programming of domestic and international fixtures for other codes. A restriction on the ability of the new stadium to host these events could potentially impact on the ability of NSW to successfully attract these major events, with the risk that these event opportunities are lost to other Australian states or to other countries where major stadia are not limited in the number of sporting events able to be hosted. NSW’s competitiveness would therefore be compromised if it was not able to offer a comparable or better sporting and associated tourist experience offer.

**Table 4 10 World Cups in 10 Years, with facility requirements**

Event	Year	Facility Requirements
Rugby League Nines World Cup	2019	<i>Rectangular stadia</i>
Men’s ICC World T20	2020	Oval stadia
Women’s ICC World T20	2020	Oval stadia
ATP Tennis World Team Cup	2020-2030	Tennis centre

Event	Year	Facility Requirements
Women's Rugby World Cup	2021	<b>Rectangular stadia</b>
UCI Road World Cycling Championships	2022	N/A
FIFA Women's World Cup	2023	<b>Rectangular stadia</b>
Men's Rugby World Cup	2027	<b>Rectangular stadia</b>
Netball World Cup	2027	Arena
Rugby League World Cup	2029	<b>Rectangular stadia</b>

### Social and economic effects of limit on events

Precluding the stadium from hosting sporting fixtures and events that would otherwise comply with the relevant environmental, social and economic framework is unfounded and in opposition with the objective of this project to deliver a modern, globally competitive stadium. It would also result in the loss of potential economic, social and cultural opportunities for Sydney and NSW.

- Capping the number of sporting events hosted on the site would prevent realising increased economic opportunities. The assessment at **Appendix M** quantifies that an additional 10 events would result in an additional 200,000 visitors to the redeveloped stadium, including intrastate and interstate residents as well as a small proportion from overseas (depending on the type of event), which would have flow on benefits to the surrounding community, the region and the broader NSW economy. In addition to the 1,100 - 1,220 direct jobs created per event, the additional attendees to the stadium would support jobs in broader sectors including retail, accommodation, transport as well as inputs into the various industry supply-chains supporting the stadium operation, resulting in some 780 to 860 indirect jobs in the broader economy per event. The addition of these jobs will assist the local economy and the viability and diversity of facilities available to the local community.
- The spending associated with additional attendances from interstate and international visitors would equate to a total \$16.4 million in additional spending for the additional 10 events, with a large proportion of this spending directed at retail facilities (food and beverage) as well as accommodation and transportation services.
- The major impact of a further 10 events at a redeveloped SFS will be due to lost attendance at competing stadiums. As the State Government controls the nearest major competing stadiums, this competitive impact is considered limited, with the stadia to be managed as a network to ensure optimal event management and attraction. Furthermore, it is likely that a number of the additional 10 events will be new events to NSW (allowing the state to compete more effectively with other states in the country and international venues) or will support new and emerging codes that otherwise would not be given the opportunity to host events at a Tier 1 stadium.
- A key component of future-proofing and the overall vision for the redevelopment of the SFS has also been to provide the necessary facilities and platform to cater for and grow women's elite sports and emerging competitions. Requiring the stadium to program events within a set cap disincentivises and restricts the ability of the stadium to promote emerging sports which do not have a large established fan-base and permanent schedule of matches within Sydney. Operating within a cap will effectively require the stadium to prioritise confirmed regular domestic and international fixtures and those events with the highest potential attendances and economic return, at the expense of events which have potential for future growth. Restricting the roster of events, therefore, directly undermines the ability of the stadium to host and grow emerging sports that can otherwise have a significant positive social impact. The growth and awareness of women's elite sports contributes to the NSW Government's vision under *Shaping the Future of Women's Sport in NSW 2019-2023*, as discussed above.

Taking the above into account, there would be a net benefit in enabling the stadium to continue to operate without a cap on sporting events as proposed.

### No unacceptable environmental impacts from major events

As noted in the preceding section, the existing stadium does not have a limit on the number of events able to be hosted. The proposed stadium remains consistent with this and therefore will not result in any increase in environmental impacts. Rather, the modern stadium will implement a number of significant improvements in the facility design and operational management approach that will reduce environmental and social impacts on the community compared to the existing stadium that operated since 1988. Detailed technical assessments have been

included in the Concept Proposal (SSD 9249) and the current SSD DA that demonstrate that the environmental impacts of sporting events hosted at the stadium are acceptable, particularly:

- Noise impacts from sporting events at the SFS and SCG in the worst case scenario (full capacity at SFS in conjunction with simultaneous full capacity at SCG) continue to comply with the noise criteria at all sensitive receivers. Noise emissions from sporting events is significantly less than that of concerts, which continue to be capped in accordance with the existing stadium restrictions. The existing time restrictions for sporting events are to be maintained, which means that the operation of the stadium does not result in new or additional late-night noise generation. The absence of any exceedances negates the need for additional measures in terms of limiting usage. In addition, the design of the stadium provides for a reduction in noise impacts compared to the existing stadium (in the order of 2 – 10 dB depending on the nature of event), resulting in an improved outcome for the community as a result of the redevelopment.
- Traffic impacts in all event scenarios have been modelled and found to have an acceptable impact on the performance of the road network, with short-term localised impacts predominately occurring outside of peak periods. The implementation of the Green Travel Plan will seek to encourage non-car modes of travel, whilst the commencement of Sydney Light Rail services provides additional new mass-transit capacity to the stadium precinct.
- An increase in events does not result in additional parking impact to Moore Park. Centennial Parklands and Moore Park Trust is responsible for the management of this land and is continuing to progress with the removal of parking from this area in accordance with the Moore Park Master Plan.
- An Anti-Social Behaviour Strategy has been developed to inform the management approach for crowd behaviour within and outside of the precinct in collaboration with NSW Police, representing an improved and new approach compared to the previous stadium which has been developed from best-practice approaches to major event management.

#### Perceived cumulative impacts of increased event frequency

It has been suggested that an uncapped operating environment could result in an increased frequency of events compared to the former stadium, and consequently the cumulative impacts of increased event frequency requires assessment.

The cumulative impacts of a potential increase in the frequency of events is unfounded. The full suite of technical and specialist reports prepared to support the SSD DA and this Report have considered all event types and demonstrated that the relevant amenity criteria (noise, vibration, traffic, etc) will be fully complied with year round. For clarity, the relevant criteria apply every day of every year. This means that on any given day, if an additional event(s) was held in excess of the Department's identified 'limit' of 52 in the Concept Plan Approval, an exceedance beyond regulatory comfort levels would not be experienced. This would be the case whether a singular or multiple events beyond 52 events were held.

The perceived social impacts (for eg: leaving behind of rubbish and patrons engaging in anti-social behaviour) which are not subject to regulatory comfort levels/criteria are being proactively managed by the SCG Trust, and will continue to be so. The SCG Trust employs as many initiatives as possible within its control and area of jurisdiction to curtail anti-social behaviour and minimise social impacts. These include undertaking rubbish collections after events, and implementing the aforementioned Anti-Social Behaviour Strategy with the NSW Police. Management responses may be customised for individual event types having regard to the scale, patron numbers, time of day and duration, if and when warranted.

It is also important to acknowledge the stadium's urban context. The SCG Trust will continue to use its best endeavours to minimise social impacts associated with events held at the stadium. The Stadium and Trust however cannot be reasonably held accountable for all anti-social behaviour in the broader precinct and this particular urban context. There are undoubtedly anti-social activities that take place that are entirely independent of the stadium and Trust; it is critical that these are not used as the justification for arguing an event cap, particularly in the context of the substantial social and economic benefits associated with the project.

#### Summary

In summary, the imposition of a restriction on the number of sporting events is not appropriate as it would:

- Be inconsistent with the operations of the former stadium and other comparable stadia elsewhere in Australia and nationally.
- Be inconsistent with the *NSW Stadia Strategy* which has informed the NSW Government's investment decision for this project and compromise the ability of the stadium to support the *Shaping the Future of Women's Sport in NSW 2019-2023* strategy to grow women's sporting content.
- Compromise the ability of NSW to attract major events that generate the greatest social and economic returns, including those identified in the *10 World Cups in 10 Years* as well as future major sporting events.
- Result in significant economic impacts to the NSW economy, with lost opportunities to attract additional visitor expenditure which flows through the broader economy in accommodation, hospitality, retail as well as the loss of direct employment and revenue opportunities at the stadium.
- Result in significant social impacts associated with the loss of major events that detract from NSW's sporting culture, and have a particularly adverse impact on the ability of the stadium to support significant social benefits associated with growing emerging events such as women's sporting competitions.
- Not be warranted by the technical assessment of the environmental, social and economic impacts of the stadium which are able to be managed to acceptable levels through the identified Mitigation Measures and standard conditions of development consent.
- The cumulative impacts of a potential increase in the frequency of events is unfounded.

### 5.3 Accessibility and circulation

The Department and City of Sydney Council have requested further information regarding the accessible design features of the proposal and specifically the capacity of the proposed lifts at the Driver Avenue entrance to accommodate demand on event days, the requirement for the steps to the Driver Avenue frontage of the site (known as the Moore Park Terrace), and details for other design measures that have been implemented to promote universal design. The Department further requested details regarding how the public domain has been designed to address crowd movements into and out of the site during major events.

#### Proponent's response

The former stadium did not comply with the Building Code of Australia (BCA) and the Disability Discrimination Act (DDA), was deficient in wheelchair-accessible seats and female toilets, and did not meet standards for access for people with a disability. A key driver of the proposed development has been to provide a well-designed and equitable facility in terms of the public domain and stadium event experience.

#### Lift capacity

Both during events and outside of events, the site will be accessible to the general public and has been designed to function as an extension of the surrounding public domain through removing all of the boundary fencing and providing new site entrances from Moore Park Road, Driver Avenue and the reinstated MP1 carpark. Owing to topographical and other environmental constraints discussed further in the section following, the entrance to the site from Driver Avenue cannot be at-grade and as such access has been provided via stairs and two (2) public lifts.

A number of stakeholder submissions, as well as the Department and City of Sydney Council sought clarification on the capacity of these proposed lifts to accommodate demand on event days for patrons using the Driver Avenue frontage of the site. Accordingly, Arup has completed an assessment of the proposed lifts for migrating patrons from the Drive Avenue entrance and dedicated drop-off / pick-up areas to the external concourse surrounding the stadium, and vice-versa (see **Appendix I**). The assessment confirms that the two lifts provided are capable of accommodating the expected demand prior to or after an event. Arup has recommended larger lifts be considered but acknowledges that this can be evaluated through the detailed design process post approval.

In the unlikely event that both lifts are unable to operate, equitable access is to be facilitated via the at-grade entrances from Moore Park Road. In this regard, information on the best path of travel for persons with mobility impairments would be available on the SFS website to assist in travel planning prior to an event. This information would be updated to address any changes in these circumstances. The project's accessibility consultant, Before Compliance, has also confirmed that the proposed drop-off facilities in MP1 can be achieved and that direct access is provided to the lifts at the stadium's Driver Avenue entrance. Access for mobility impaired patrons to MP1 will be

available via an optional managed pre-booked system to ensure access is provided for those patrons in need of the lift should they wish to plan ahead and book access.

In addition, Moore Park Road will provide level access via existing kerbside clearways to the concourse surrounding the Stadium. The clearways, which are often put in place by the NSW Police to manage pedestrian movements, would be continued following the former process to provide additional pedestrian circulation space for this access point. Variable wayfinding signage or staff within the site would also be able to assist in travel planning for those already on site.

The potential to also provide a ramp was investigated by Aspect Studios and Before Compliance, to operate in conjunction with the proposed lifts. A ramp on the Driver Avenue frontage of the site that meets the relevant design standards would need to be 98.5m long. This ramp results in an unreasonable distance for persons with mobility impairments to travel uphill and could not be physically accommodated without significant impacts on the external circulation concourse of the stadium or protrusion outside of the project boundary. Aspect Studios and Before Compliance collectively resolved that providing a ramp along this frontage would not be appropriate, and consequently it has not been pursued in the ultimate design for the site in favour of the proposed lifts and at-grade entrances along Moore Park Road.

### Moore Park Terrace

The 'Moore Park Terrace' describes the site entrance from Driver Avenue and Moore Park. This entrance is signified by two (2) grand stairways that align with the lines of pedestrian movement either side of Kippax Lake and along Driver Avenue. The stairs are a total of 38 metres in width, comprising two major and one minor flight of steps separated by landscaping. These stairs are necessary to overcome site and environmental constraints and have been designed to enable safe and efficient access and egress for the stadium.

Elevating the stadium entry from the southern Driver Avenue frontage of the site enables the public domain level to tie seamlessly with the northern site boundary and the Moore Park Road public domain. Prioritising this seamless integration to the north provides a consistent and permeable interface with the adjoining residential area, prioritises access to the new passive and active recreation public spaces at Fig Tree Place and Busby's Corner, and improves pedestrian amenity along Moore Park Road. Importantly, prioritising this at-grade interface with the northern site boundary also overcomes a number of environmental constraints. The opportunity to instead provide an at-grade entrance to Driver Avenue, and with stairs to Moore Park Road, was investigated in the preliminary stages of the proposal and found to result in significant unforeseen impacts. Sinking the stadium further into the site to reduce the extent of stairs or event entirely remove the stairs from the Driver Avenue frontage would result in:

- Potentially physically impacting Busby's Bore and areas of archaeological potential beneath the site, which under the current design are protected by areas of fill or limited excavation.
- Penetrating the existing water table beneath the site, which would require a tanked structure to mitigate the risk of flooding to the playing field and building basement, as well as environmental impacts associated with changes and impediments to the natural flow of the groundwater. This groundwater currently feeds Centennial and Moore Park's ponds and lakes that are important to the local ecosystem.
- Reducing the public domain areas, landscaping, and recreation spaces that act as a buffer and provide amenity to the residences north of the site. Sinking the stadium would result in a significant level change between the stadium site and the existing footpath on Moore Park Road, which would require installing steps and further lifts. The stairs and lifts would reduce the width and accessibility of new passive and active recreation public spaces at Fig Tree Place and Busby's Corner, overall impacting opportunities for recreation and for landscaping at the site's edge. This would result in overall poorer design outcome with reduced public benefits and amenity.

It is further understood that grading the site to provide at-grade entrances to both Moore Park Road and Driver Avenue would also not be possible. Grading the site would require significant terracing to provide areas for seating, landscaping and functional and event overlay spaces, effectively removing the ability to deliver a level external pedestrian concourse around the stadium. The resultant stadium would therefore not be able to comply with modern stadium design requirements and the design would undermine operational efficiencies, pedestrian circulation (especially for those with mobility impairments), require additional site excavation presenting the above environmental risks and potentially exposing areas of the basement, and would overall result in a disjointed and poorer design outcome.



In addition to the above, it is noted that the use of stairs as part of the entry to major stadia is a commonly used and recognised design feature in both national and international stadia, and as such is not an uncommon or unreasonable design response for the SFS redevelopment. Analysis completed by COX Architecture and provided at **Appendix B** confirms that stairs have been used to allow the major movement of patrons to and from stadia successfully within Australia and internationally including the Victor Trump Stand at the SCG, AAMI Park (Melbourne Rectangular stadium), Suncorp Stadium (Brisbane stadium), Optus Oval (Perth stadium), Etihad Stadium (Docklands Melbourne stadium), Cape Town Stadium, and Emirates Stadium (Arsenal football stadium in London) (refer to **Figure 5** on Page 40 below). In each instance, the stairs have been provided to overcome topographical constraints and prioritise the delivery of an accessible 360° external concourse surrounding the stadium and at-grade stadium entries. This further enables the main stadium entries and circulation areas to be vertically separated from the field of play and back of house areas.

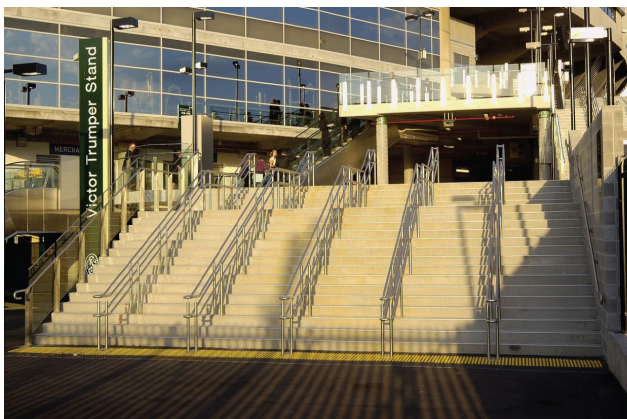
The proposed stairs have been designed to achieve the relevant the relevant Australian building regulations and codes and the recommendations of the Sports Grounds Safety Authority's *Safety in Design of Sports Grounds* publication, and as such will enable safe and efficient major pedestrian access and egress.

#### Universal design measures

The proposed stadium has been designed to offer significant improvements including increasing the quantum of wheelchair-accessible seats and female toilets to meet contemporary construction standards, providing unisex toilets, adult changerooms, prayer rooms and parenting rooms, and delivering DDA compliant bathrooms, access points, circulation paths throughout the external concourse, and accessible seating across all levels and ticket types. In addition to creating accessible and compliant paths of travel around the stadium, the detailed design of the public domain will accommodate tactile markers, such as at the top and bottom of stairs and the revised Landscape Plans at **Appendix C** incorporate planting at the top of all seating terraces. Other improvements may be investigated at the detailed construction drawing phase, to ensure that various elements of the proposal will meet the applicable performance requirements of *DDA Premises Standards 2010* and the Building Code of Australia (BCA). Before Compliance confirms the proposed development remains capable of complying with these requirements (see **Appendix R**).

#### Public domain capacity

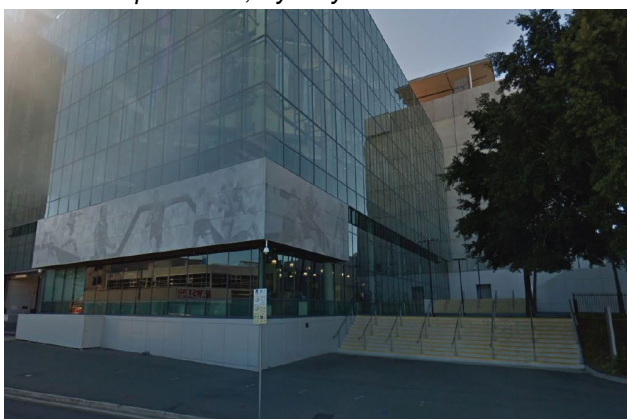
The assessment of the capacity of the public domain has been undertaken by desktop studies by COX Architecture and reviewed by Arup and GTA Consultants, as confirmed in the responses to **Appendix B**. For the desktop studies, the evacuation studies considered the discharge of patrons from exits to the closest boundary of the site. The discharge points for concerts and sports events differ. The studies confirmed that there was sufficient clearance to accommodate flows from these events in either situation. The assessment of flow rates uses the recommendations of the Sports Ground Safety Authority in their *Guide to Safety at Sports Grounds*. In the further development of the design, dynamic pedestrian modelling programmes will be utilised.



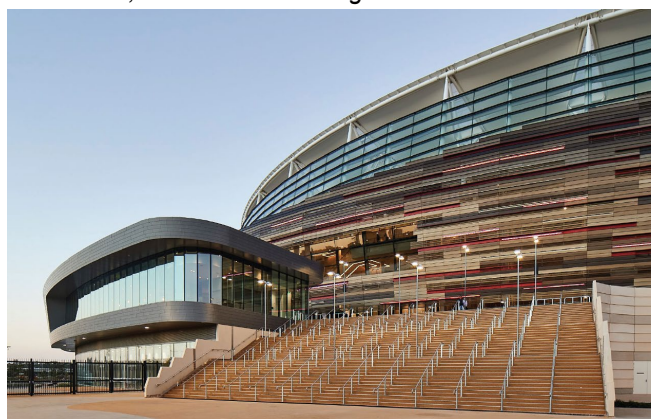
*Victor Trumper Stand, Sydney Cricket Ground*



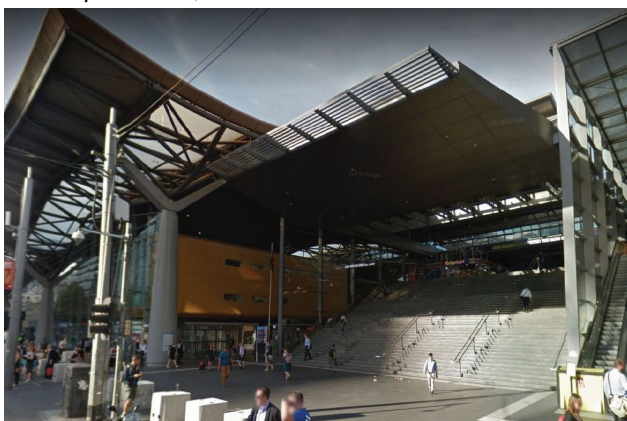
*AAMI Park, Melbourne Rectangular stadium*



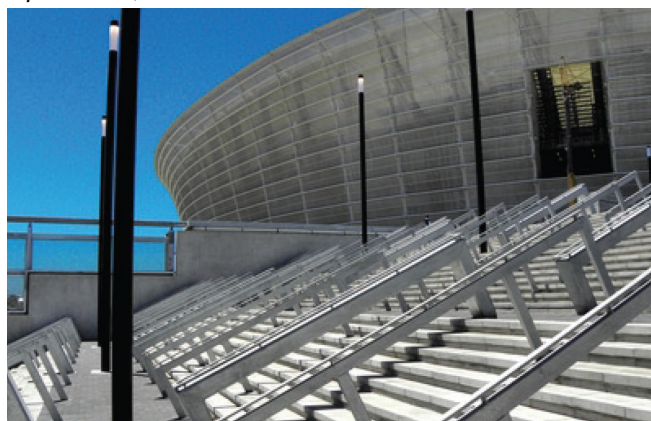
*Suncorp stadium, Brisbane stadium*



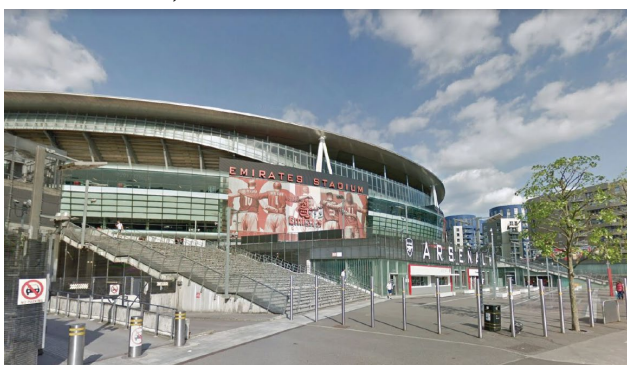
*Optus Oval, Perth stadium*



*Etihad stadium, Docklands Melbourne stadium*



*Cape Town stadium*



*Emirates stadium, Arsenal stadium London*



*Sydney Football stadium (the proposal)*

**Figure 5 Examples of national and international stadia utilising grand entry stairs and a render of the proposed stairs**

Source: COX Architecture



**Figure 6** Render of the proposed Moore Park Terrace stairs

Source: COX Architecture

#### 5.4 Social impact assessment

Notwithstanding the separate discussion regarding event numbers in **Section 5.2** above, the Department also requested further analysis and assessment of the social and economic impacts of the development, identifying specific scenarios to be addressed which are summarised as follows:

- An assessment of the baseline condition of how people experience noise and how the proposed stadium will change this experience.
- An assessment of the potential impacts on pedestrian patrons accessing the stadium from Central Station for residents and businesses around Devonshire Street, especially in the post-event scenario.
- An assessment of how the project might affect the livelihoods (employment and local economy) of people in the area, particularly in light of the recent impacts of the Sydney Light Rail construction.
- An assessment of the outcomes of the research conducted regarding anti-social behaviour and integrating this assessment into the anti-social behaviour strategy to ensure that they are directly informed by community experience and sentiment and the Mitigation Measures respond to the predicted impacts.

#### Proponent's response

In view of the above, an addendum Social and Economic Impact response has been prepared by Ethos Urban and included at **Appendix M**. The addendum assessment provides a detailed response to each of the issues raised above, in addition to an assessment of the impacts of greater events than the assumed 52 event baseline as discussed in **Section 5.2** above.

- The addendum reconfirms the findings of the Stage 1 Social and Economic Impact Assessment and the associated addendum assessment submitted at Stage 1 and exhibited with the Stage 2 EIS. These conclude that the negative impacts on the local region were primarily associated with the demolition and construction of the stadium including potential amenity impacts and inconveniences from with the relocation of events, restricted access to the site and carpark, and the risk of impacting heritage items. These negative impacts were, however, identified as being temporary and would subside when the construction phase of the project was completed. The identified negative impacts did not extend to tourism, retail, entertainment and night-time economies, which were all identified as benefitting from the proposed development over the long-term.
- The addendum confirms that the Noise and Vibration Assessment finds that the proposed stadium is not expected to increase noise emission compared with the former SFS, and presents no additional or significant

acoustic issues. This assessment is founded in both long-term and short-term noise monitoring to understand the prevailing ambient noise environment, which comprises traffic noise from Moore Park Road and Anzac Parade, the 'urban hum' of the CBD, aircraft noise, as well as activities from the use of existing facilities in the sporting and entertainment precinct. When considered historically, the broad influencing factors of this ambient noise environment would not have significantly changed.

- The addendum notes that whilst the stadium capacity has not increased from the former stadium, and as such peak travel impacts will remain generally unchanged, the migration of event patrons from the site to Central Station via Devonshire Street following the conclusion of an event would increase the foot-traffic above what is typically experienced in these areas, which could also occur more frequently depending on the frequency of events. The effect of this foot-traffic on residents and businesses would be relatively short lived, recognising that at the conclusion of events the majority of patrons will migrate from the stadium to key connections or other venues within the first 30 minutes to an hour. The effects of this additional foot-traffic would be positive in terms of increased demand/interest in local business and increased activity and passive surveillance, and negative in terms of potential anti-social behaviour. In this regard, the appropriate management of patrons attending the stadium ensures that when they leave the site there is a far reduced risk of incidences.
- The addendum finds that during the construction phase of the project, there is the potential for works on the site to generate impacts on surrounding businesses and, therefore, on employment and the immediate local economy. This included construction works resulting in temporary negative impacts on the amenity of businesses, and direct and indirect impacts on service and hospitality industries as a result of there being no active stadium on the site. These impacts were not considered to result in significant changes in employment and the local economy, and would not coincide with the construction of the Light Rail that will be primarily complete at the time construction works are underway on the site. The project will positively impact the livelihoods of people in the area once operational including increasing access to employment, increasing spending in hospitality, accommodation and entertainment and associated increases in jobs, and increasing foot-traffic and patronage for businesses in the local area.
- The addendum statement confirms that during the preparation of the proposed development, consultation was completed with NSW Police, the community and local stakeholders who highlighted that community concerns generally related to disorderly conduct linked to alcohol consumption. The likely effects of this were considered to be reduced perceptions of safety, a disrupted sense of place, and an increased risk of injury. The Anti-Social Behaviour Strategy was developed collaboratively by Ethos Urban with SCSGT and NSW Police in to help address these issues and mitigate community impacts. This Strategy will appropriately manage the potential impacts.
- The Stage 2 addendum Social and Economic Impact Assessment, accompanied by the Stage 1 assessments, was placed on public exhibition with the Stage 2 EIS at Appendix O of the EIS. The Anti-Social Behaviour Strategy at Appendix R of the EIS was also discussed with the CCC and other stakeholders including City of Sydney Council, the Sydney Coordination Office, Transport Management Centre, TfNSW, RMS, NSW Police, and the CPMP Trust prior to its lodgement. These assessments have been informed by consultation completed to date, and no change is required.

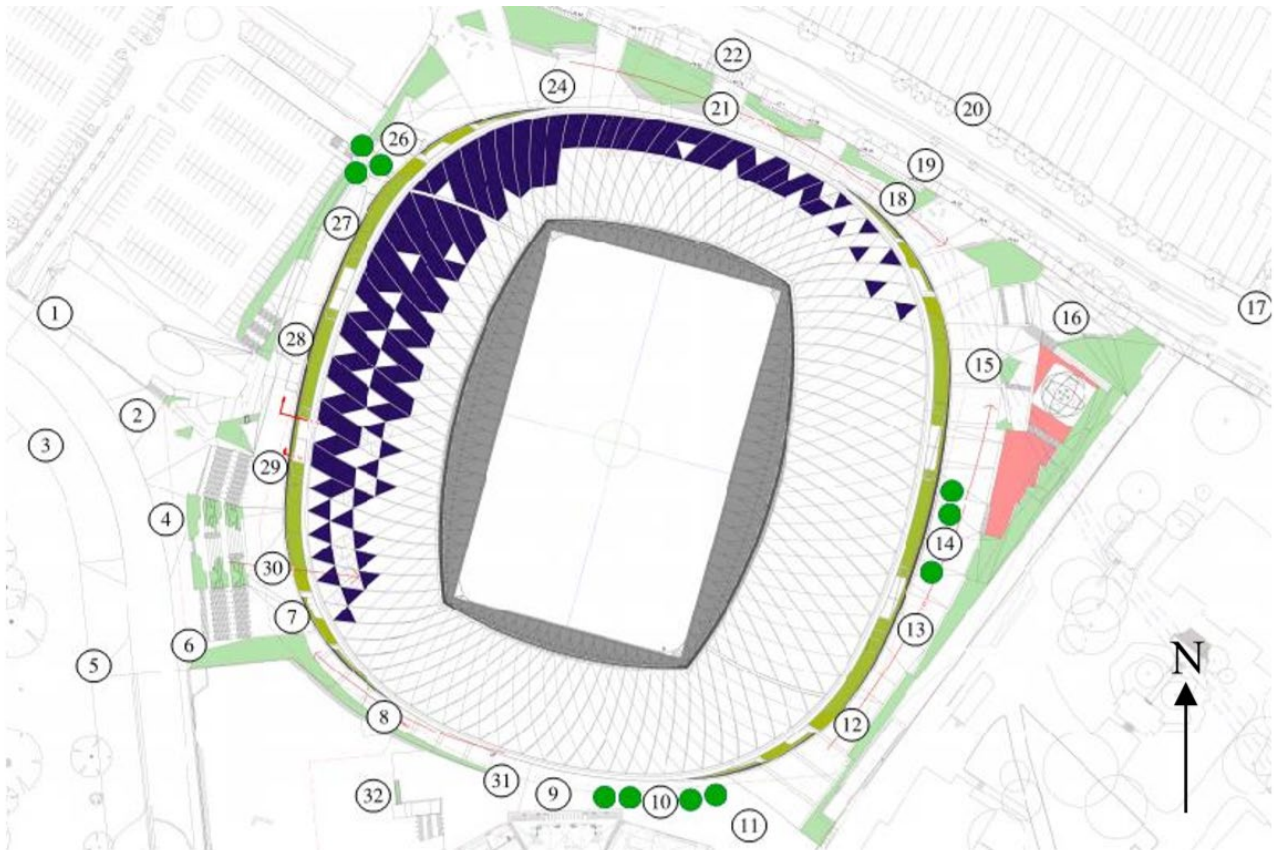
The assessment at **Appendix M** identifies and assesses the range of potential social impacts and concludes that the identified negative social impacts on the local region resulting from the operation of the stadium will be effectively managed through the intended detailed design and operational framework. This includes recommended ongoing monitoring measures.

## 5.5 Pedestrian wind environment

An addendum assessment has been prepared by Arup and is included at **Appendix G**. The assessment considers the wind tunnel modelling data and provides further insight into the anticipated wind conditions and practical implications of the outcomes of the Environmental Wind Assessment submitted as Appendix Z of the EIS. It provides further assessment of the modelled wind conditions with regard to Council's new wind criteria contained in the Draft Development Control Plan (DCP) that forms part of the Draft Central Sydney Planning Strategy. This new criterion is considered to be more appropriate for measuring pedestrian comfort than the current criteria contained in the Sydney DCP 2012, which utilises once per annum gusts (i.e. the extreme wind event in a year) rather than typical wind conditions. The draft criterion removes the assumed extrapolation from the extreme 'once per annum' event to more regular events.

The assessment against the typical and regular wind events confirms that all locations are expected to meet the pedestrian walking criteria, with a number of locations also being suitable for pedestrian standing. This confirms that the proposed development can achieve an appropriate level of pedestrian comfort, further noting that all locations have achieved the relevant safety criteria. Despite all locations meeting the new comfort criteria and the safety criteria, it is noted that the precinct is generally only highly occupied on game days where the dense number of pedestrians offers local wind protection, via the penguin-effect, further reinforcing that the areas surrounding the stadium are appropriate for their intended use.

The Addendum Wind Data Analysis also further analyses the impact of mitigation measures to assess the degree of improvement and, therefore, the appropriateness and practicality of implementing such measures. The assessment introduced mature trees at Locations 26 and 10 (see **Figure 5**) and measured the impact, confirming that the trees did not significantly improve the wind environment in these locations, which remained capable of meeting the pedestrian walking criteria. The introduction of trees also presented potential negative environmental impacts through impeding pedestrian circulation, operational activities for the SCG, and sightlines within the public concourse surrounding the stadium, thereby, negatively impacting movement and safety within the site. Accordingly, Arup confirmed that no mitigation measures or design alterations were required or were appropriate. The pedestrian wind environment created by the proposed development is, therefore, considered to be acceptable.



**Figure 7** Wind tunnel testing locations showing where trees were included in the testing

Source: Arup

## 5.6 Transport

The Department, TfNSW, local councils and other agencies identified a range of specific issues to be clarified with regard to traffic, parking, public transport, and bicycle and pedestrian access. Whilst each of these issues have been addressed individually in detail at **Appendix A** and in the responses provided by JMT Consulting at **Appendix J**, the following additional responses have been provided for completeness.

## Parking

As addressed in Section 6.3.1 of the EIS and the Transport Assessment provided at Appendix H of the EIS, no change is proposed to the provision and arrangement for general public parking associated with the operation of the stadium. Consistent with the operation of the former stadium, no onsite public parking would be provided and the stadium would continue to utilise the approximately 2,000 permanent carparking spaces provided within the Entertainment Quarter and 2,850 temporary event carparking spaces in the vicinity of the stadium (EP2 – Kippax, EP3 – Showground, Sydney Boys & Girls High School). These car parking facilities are not provided by or controlled by the SCSG Trust, but have historically been used by patrons of the stadium when made available by the relevant land manager.

The CPMP Trust's *Moore Park 2040* master plan identifies the removal of parking on Moore Park East, which was to occur in stages and was predicated on the replacement of this parking with satellite parking to ensure no net loss of parking within the precinct. The CPMP Trust has indicated that despite the provisions of this master plan, the removal of parking on Moore Park East could take place in 2020, concurrent with commencement of operations of the Light Rail, and without the provision of satellite parking. Should the parking in Moore Park East be removed (and no replacement parking within the precinct brought online) the mode of patrons travelling to and from the site would shift towards active and public transport modes. It is noted that there is no single mode split that can be identified for the operation of the stadium as it depends on a number of factors such as weather, the teams who are playing and the current success of such teams.

Infrastructure NSW has committed to the implementation of an Event Transport Management Plan as part of revised Mitigation Measure D/O-TA2. This plan will be enacted prior to commencement of operations and is intended to be regularly updated throughout operations of the stadium. As plans for removal of parking on Moore Park are yet to include a firm date for enactment, the Event Transport Management Plan would provide the appropriate mechanism by which to adjust initiatives identified in the Green Travel Plan to suit a changed transport environment.

Car parking for construction workers will not be provided on site. Car parking facilities are available at Entertainment Quarter and are considered a feasible option given those facilities are not highly utilised during construction hours (ie: there is no demand conflict between construction works and Entertainment Quarter and other precinct visitors). Construction workers are not expected to park in surround streets as the area is time limited, and topping up parking meters ever few hours is not a reasonable option for construction workers to take. In addition, and consistent with many large scale construction projects occurring across the city, the appointed contractors will be encouraged to promote non-private car travel to and from the site consistent with the Construction Traffic Management Plan to be prepared for the project.

## Pedestrian access

Section 4.10 of the EIS identified potential future pedestrian connections in the surrounding precinct that were to be investigated further and pursued as part of separate and future stages. These included an enhanced connection to Tibby Cotter Bridge to support improved pedestrian access to and from the site, and future connections between the site and Fox Studios and the Entertainment Quarter. Each of these connections were identified as being subject to further consultation with relevant stakeholders, and to be pursued separately to the works described in the EIS recognising that it may not be within Infrastructure NSW and/or the SCSG Trust's jurisdiction to obtain the necessary development approvals.

This report reiterates Infrastructure NSW's commitment to continuing to work with the CPMP Trust to deliver improved pedestrian connectivity between the Tibby Cotter Bridge and the stadium around Kippax Lake. This link was envisaged in the adopted *Sydney Football Stadium Urban Design Guidelines*, however, is reliant upon further consultation and implementation with the CPMP Trust. Recent discussions with the CPMP CCC confirmed that this enhanced link could take the form of intuitive design through planting or other mechanisms to assist wayfinding and channel pedestrian movements, rather than the provision of a new hardstand path. The nature of this connection is, therefore, still being developed in collaboration with the relevant stakeholders. Because this link occurs on CPMP Trust's land, the ultimate pedestrian connection and design response is dependent on the agreement of the Trust. The updated Mitigation Measures reflect this commitment to progress consultation with the CPMP Trust.

Similarly, the connection from the site to adjoining lands on the eastern and southern boundary of the site can only be fully realised with the agreement of the CPMP Trust and the leaseholders of Fox Studios. As detailed in Section 4.10 and 5.3.6 of the EIS, the position of the proposed stadium and the design of the public domain has enabled public access to adjoining land to the south and east, however, the ultimate delivery of these complete pedestrian links through Fox Studios to the east and along the shared boundary with the SCG to the south cannot be achieved without further works on adjoining land that is controlled by other landowners. The continuation of links requires access through Fox Studios which can only be delivered by the CPMP Trust who owns this land and would be subject to negotiations with Fox Studios under long-standing land tenure agreements. Therefore, whilst the DA provides for future links to occur through the site, it ultimately cannot deliver the next portion of the connections through the adjoining land as it is reliant on other landowners and leaseholders.

## 5.7 Visual privacy

Section 6.2.6 of the EIS assessed visual privacy to residential development to the north of the site and confirmed that the stadium has limited direct visual interface with dwellings to the north, has been designed to minimise any potential opportunities to overlook these dwellings from within the stadium, and will be supported by retained and new trees along the northern site boundary. However, a submission from Fox Studios raised visual privacy as a concern, requesting further information be provided in the interface between the site and Fox Studios. In response to this submission, COX Architecture has prepared an additional privacy review assessment of the stadium's interface with Fox Studios (see **Appendix B**), identifying key views from the stadium to Fox Studios.

At a high-level, it is emphasised that visual privacy between non-residential development is not a primary concern in planning terms, and that Fox Studios has historically adjoined a stadium meaning the proposed development will not significantly alter the existing relationship between the site and this adjoining commercial precinct. Limited views, comparable to those now proposed, were available from the former Stadium into the Fox Studios site and posed little risk. It is also expected that events hosted by the stadium will be the primary point of interest for patrons, recognising that the availability of views from the site to Fox Studios does not necessarily translate to or represent an adverse risk to Fox Studios' day-to-day operations.

The assessment by COX Architecture identifies six (6) typical views that are available from openings in the primarily opaque eastern facade of the stadium to Fox Studios. The following is an assessment of these views and the reasonableness of the proposal:

- Views from the Level 3 and 4 terraces are primarily obscured by the facade balustrade and louvres (see **Figure 8** and **Figure 9** below). Any views provided above and through these facade elements typically terminate at existing buildings within Fox Studios and are obscured by vegetation within the site.
- Views from the stair landings between Levels 2 and 3, and Levels 3 and 4, are also obscured by louvres in the facade and vegetation within the Fox Studios site (see **Figure 10** and **Figure 11** below). Whilst some views are available from these locations to within the Fox Studios site, these views are from transitory spaces and as such it is unlikely that the stair landings will be occupied by stadium patrons for extended periods of time.
- The view from the Level 4 atrium space is also obscured by louvres in the facade and vegetation within the Fox Studios site (see **Figure 12** below). Similar to the above, it is not intended that this space will be occupied for extended periods of time, rather it serves as a transitory space, ensuring there is a reduced risk of potential privacy impacts.
- The view from the Level 2 Club Lounge is obscured by the facade balustrade and louvres, with any available view above and through these facade elements typically terminating at existing buildings within Fox Studios and are obscured by vegetation within the site (see **Figure 13** below).

The assessment demonstrates that there are limited sensitive opportunities available to overlook Fox Studios from the proposed stadium, and that whilst the facade is not completely opaque and as such some views are available, these views are typically obscured by the stadium facade and existing trees.

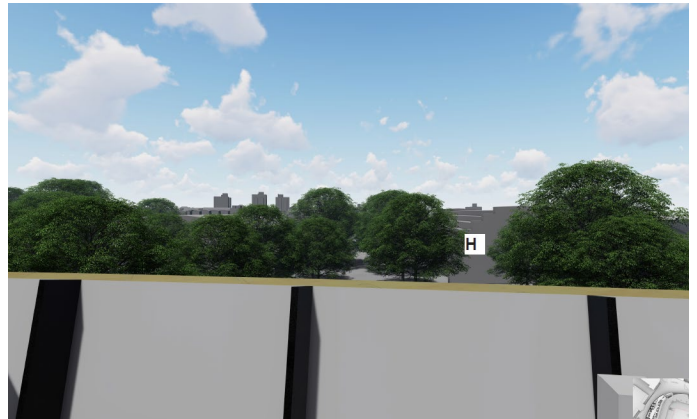
Whilst no further refinement or mitigation measure is considered necessary in this instance, additional tree planting has been accommodated into the public domain on the eastern side of the stadium to further screen Fox Studios and ensure an equitable outcome. This additional planting is shown in the extract at **Figure 14** below and the revised Landscape Plans at **Appendix C**.

To the project team's knowledge outdoor filming does not occur within the areas that have been identified across the six viewpoints.



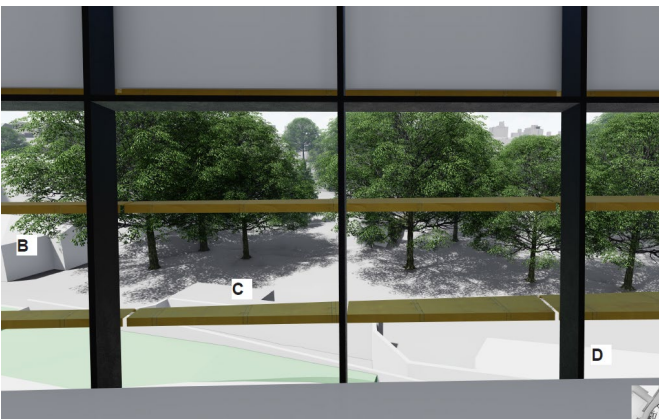
**Figure 8** View from the Level 3 terrace

Source: COX Architecture



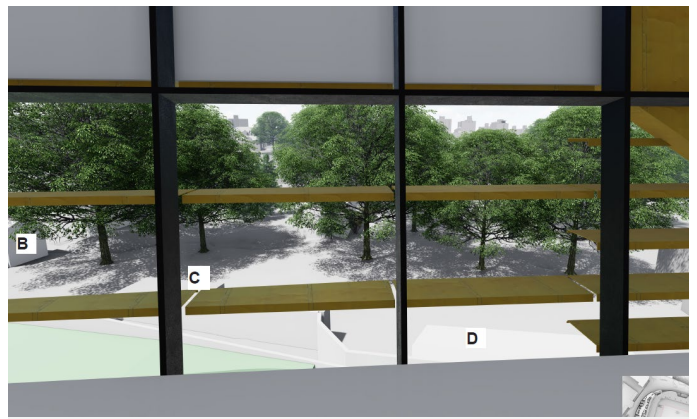
**Figure 9** View from the Level 4 terrace

Source: COX Architecture



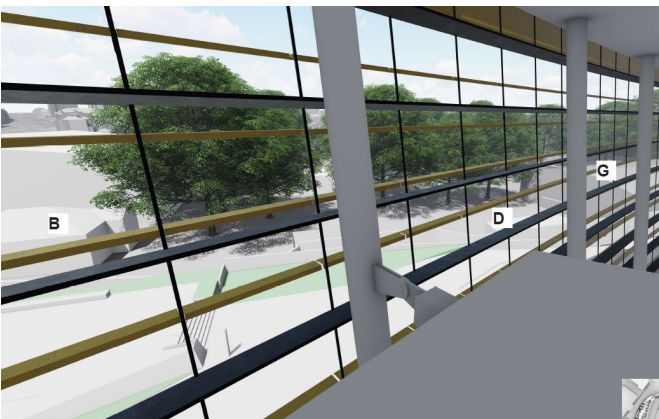
**Figure 10** View from the stair landing between Level 2 and 3

Source: COX Architecture



**Figure 11** View from the stair landing between Level 3 and 4

Source: COX Architecture



**Figure 12** View from the Level 4 atrium space

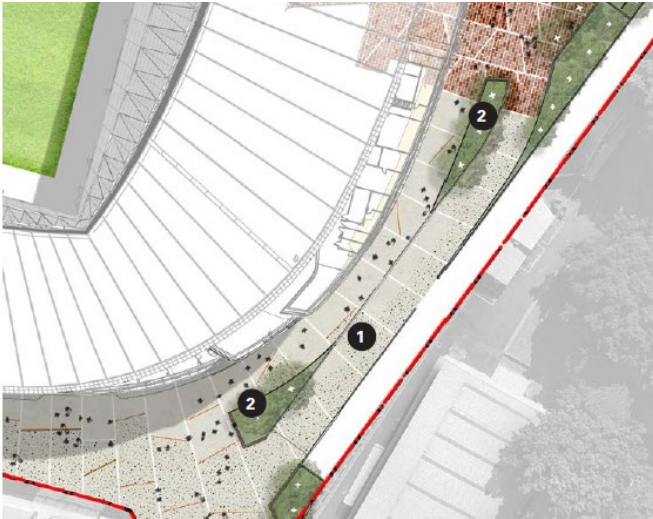
Source: COX Architecture



**Figure 13** View from the Level 2 Club Lounge

Source: COX Architecture





**Figure 14 Additional tree planting (areas #2) along the eastern side of the stadium**

Source: Aspect Studios

## 5.8 Visual and view impacts

The Department has requested updates to the Visual and View Impact Assessment submitted at Appendix W of the EIS to clarify details for the methodology and impact assessment against the nominated criteria.

### Proponent's response

A Visual and View Impact Assessment (VVIA) was prepared by Ethos Urban and submitted at Appendix W of the EIS. The assessment considered 23 views from the public domain and 8 key residential views and confirmed that the detailed design of the stadium has an acceptable visual impact and the majority of existing views will remain largely unchanged or result in a negligible or minor visual impact.

This VVIA has been revised at **Appendix L** to address queries regarding the methodology identified by the Department. It is noted that the Updated VVIA does not include updated photomontages of the stadium design, which is appropriate given the changes to the stadium structure described in **Section 4.0** are overall considered to be minor and would result in a lesser visual impact. The proposed changes include reducing the height and scale of the stadium, minor changes to the roof detailing while retaining the overall same finish and aesthetic, and adopting more earthy-toned materials and finishes in the facade and stadium base. Landscaping and other detailed design measures were not captured in the original photomontages and as such any changes to the public domain as described in **Section 4.0** also won't impact these photomontages.

The revised assessment incorporates an additional assessment of the visual character of the area, with regard to the topography, land uses, built form, open space and vegetation, and transport routes, as detailed in Section 7 of the assessment at **Appendix L** and consistent with the VVIA which accompanied the Concept Proposal. This assessment confirms the typical views and visual receptors in the area that are potentially affected by the proposed development, which together have informed the updated assessment of public views in Sections 9 and 10 of the updated VVIA.

The revised assessment has not resulted in any changes to the overall degree of impact assessed for every viewpoint, and further confirms that the level of impact on each view is acceptable and does not require the imposition of any further specific Mitigation Measure. The conclusions of the EIS with regard to public views, therefore, remain relevant as follows:

- The visual impact from Moore Park Road has been considered and minimised through intentionally lowering the stadium's northern facade to mitigate visual bulk and scale, and by pushing the stadium footprint to the south west to increase the space and landscaping between the stadium and Moore Park Road. Street trees will be maintained and supplemented along this frontage to better integrate the stadium with its surroundings and ensure the landscaped foreground from Moore Park Road remains.

- Intentionally lowering the southern facade of the stadium also reduces the visual change and visual impact on iconic views from the SCG, and ensures the proposal does not significantly impact or modify views of the iconic Sydney CBD skyline from the SCG.
- The proposal does not impact on key views from Centennial Park and other surrounding parks, including Sydney Park and the Mount Steele Lookout, in which instance the proposed stadium is either not visible or continues to form part of the urban view and is of a lesser scale than the approved maximum building envelope.
- The proposal will continue to be visible from Kippax Lake in Moore Park, which is considered to be acceptable as the proposal will simply replace the stadium that is a prominent feature of this view, and will not impact on the more scenic vantage points from Moore Park to the Sydney CBD. The roof form is curved and streamlined to ameliorate visual impact to the western and eastern interfaces.
- The proposal acknowledges the architectural form of the previous stadium, whilst also adhering to the functional brief to bring spectators closer to the playing field and provide weather coverage.
- In terms of comparison to the approved concept envelope, from a visual impact perspective, the proposal offers an improved outcome, presenting a more modest, sculpted and finessed scheme.

The Mitigation Measures nominated to address visual impacts in the EIS have been retained in the final Mitigation Measures in **Section 6.0**.

## 5.9 Stormwater, flooding, and water use

The Department requests the submission of an Integrated Water Management Plan, flood evacuation measures, and the sizing and types of Water Sensitive Urban Design (WSUD) measures to be utilised by the proposed development. Randwick City Council has also sought clarification on additional WSUD responses for the proposed development, arguing that rainwater harvesting and reuse is inadequate.

### Proponent's response

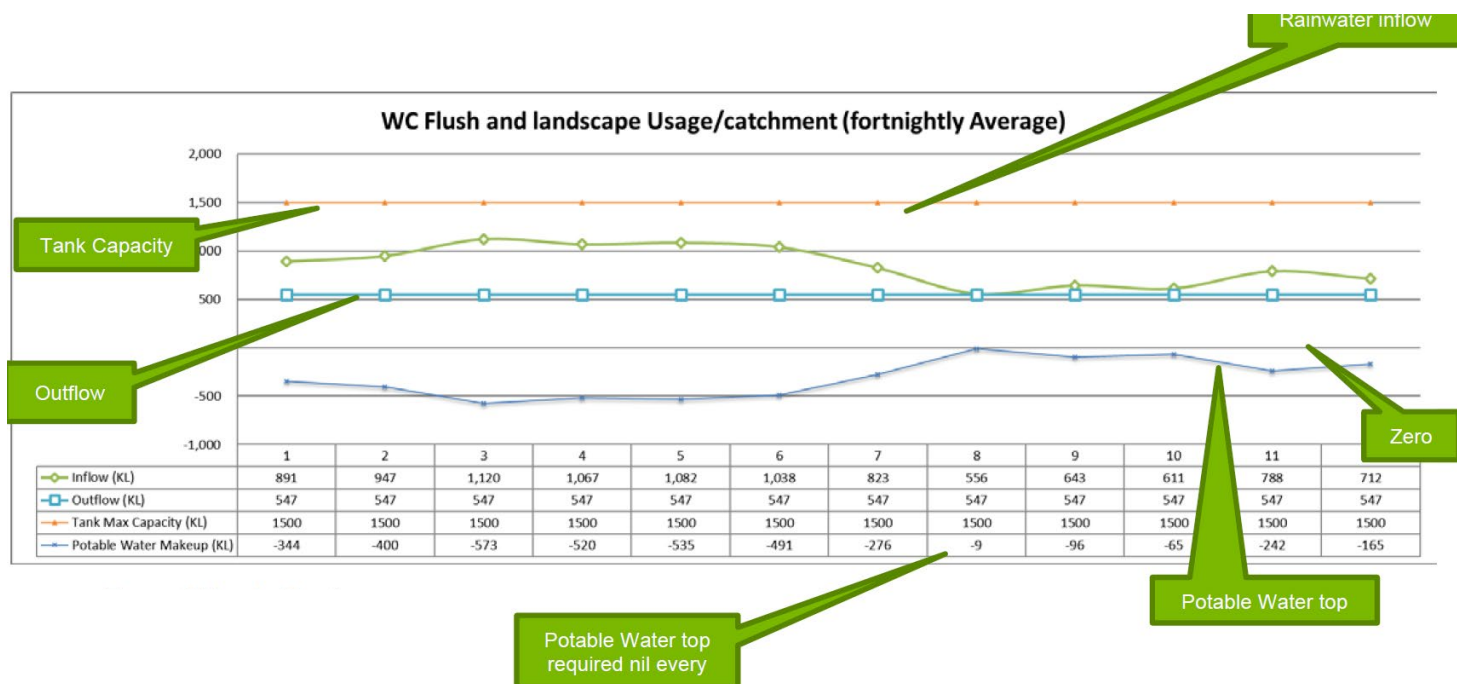
Aurecon has prepared an addendum Stormwater Response (**Appendix N**) to provide additional information and analysis on each of these matters.

#### Integrated Water Management Plan

The addendum Stormwater Response assesses the demand for rainwater and, therefore, the water savings that can be achieved. It is proposed to utilise collected rainwater for toilet flushing to reduce the non-potable water demand, recognising that pitch irrigation already separately utilises bore water under the existing license.

The assessment compares the capacity for the four 100kL rainwater tanks within the stadium basement to collect rainwater from the roof using the historic rainfall data from the Bureau of Meteorology to determine median rainfalls for each month. It then compares the rainwater collected, to the demand generated by toilet flushing for a sold-out event every week, as the baseline scenario to determine the relative water savings. It is assumed that the stadium will utilise high water efficiency appliances in accordance with its sustainability targets.

The assessment confirms that the proposed rainwater tanks will reduce the potable water for flushing to nil (100% rainwater reuse). Whilst realising this potential would be dependent on the number of events hosted, attendance of these events, and the actual rainfall levels, it demonstrates a substantial commitment to the sustainable use of resources in the operation of the new stadium.



**Figure 15 Analysis of water demand and savings**

Source: Aurecon

Water Sensitive Urban Design

As detailed in the Stormwater Management Plan submitted as Appendix P of the EIS, the proposed water quality treatment works will include installing new gross pollutant traps, filters and litter baskets to manage the quality of stormwater leaving the site. These measures were assessed using MUSIC modelling to determine the effect of these measures on the quality of water leaving the site. This modelling confirmed that in each instance these devices achieved the relevant treatment quality targets, as summarised in **Table 5** below.

**Table 5 Stormwater treatment targets and results**

Pollutant	Required reduction	Modelled annual reduction	Compliance
Gross pollutant	90%	100%	✓
Total suspended solids	85%	86.2%	✓
Total phosphorus	65%	65.2%	✓
Total nitrogen	45%	48.3%	✓

Source: Aurecon + Ethos Urban

Accordingly, it is considered that the WSUD measures incorporated into the design of the stadium will enable the proposed development to comply with the identified water quality improvement targets for the project and that in this instance no further refinement or mitigation is required.

Additional measures such as biofiltration and rainwater gardens were found not to be appropriate for the site, as such measures could not achieve an adequate size/mass to significantly contribute to the stadium’s water quality and had the potential to impact on the required 15m clear circulation zone surrounding the stadium.

The addendum assessment prepared by Aurecon at **Appendix N** confirms that some passive irrigation outside of the circulation zone surrounding the stadium has been incorporated via the garden beds which capture rainwater run-off and direct the run-off into strata-vaults. These strata-vaults passively irrigate tree roots, utilising an overflow system to drain into the conventional in-ground stormwater system.

## Flooding

The EIS confirmed that the site is located within the Centennial Park catchment area in the *City of Sydney Council Centennial Park Flood Study, April 2016* as being subject to flooding in each instance from a 2-year Average Recurrence Interval (ARI) up to a 100-year ARI event with significantly deeper and more widespread flooding occurring during the Probable Maximum Flood (PMF) event.

Aurecon completed modelling of the detailed design of the stadium and surrounds in the Stormwater Management Plan submitted with the EIS, which confirmed that flooding will continue to occur as it did for the former SFS site at the low point on Driver Avenue and at the entrance to the SCG. The flooding was determined not to be a significant increase over existing ponding and flood hazard ratings and that the levels would be manageable. Notwithstanding, it was recommended in the Mitigation Measures that an emergency response plan be developed for the site to detail flood evacuation routes and procedures from the proposed stadium.

The addendum Stormwater Response at **Appendix N** provides a preliminary approach for emergency flood events occurring, which will be further refined and detailed in the final emergency response plan prior to the operation of the stadium. It confirms that stadium staff and patrons will have the option to exit through the existing emergency exit gates located along Paddington Lane, which leads into the Fox Studio precinct where staff and patrons can walk through the Sydney Showgrounds, some 350m from the emergency exit. Alternatively, staff and patrons may take shelter on-site, with the Centennial Park Flood Study report indicating that the peak flood will occur for 60 minutes following the high intensity rainfall event.

### **5.10 Noise and Vibration**

The Department, EPA, local councils and the CPMP Trust identified a range of specific issues to be clarified with regard to noise and vibration during the construction and operational periods of the proposed development. Whilst each of these issues have been addressed individually in detail at **Appendix A** and in the updated Noise and Vibration Impact Assessment, Draft Noise Management Plan and Draft Construction Noise and Vibration Management Plan prepared by Arup at **Appendix F**, the following summary responses have been provided for completeness.

#### **Impact on Fox Studios**

In response to the submission received by Fox Studios and the CPMP Trust, additional testing has been completed to assess the potential impacts on the operation of Fox Studios. Section 3.4.5 of the updated Impact Assessment confirms that additional noise monitoring was completed whilst the Stage 1 demolition works were occurring on the site, which indicated that no external noise sources were audible within the sound stages and that the noisiest recorded events at this receiver were from sources within the Fox Studios site from vehicles passing in close proximity of the sound stages. The measured noise levels from construction activities occurring on the site would be similar to those generated by the demolition works recorded, and as such Arup confirm that the proposal is not expected to affect the normal operation of Fox Studios' sound studios.

With regard to vibration, Arup confirm that the nearest buildings to the proposed construction works are outside of the recommended minimum working distances specified in Section 3.8 of the Noise and Vibration Impact Assessment at **Appendix F**. On this basis, discernible ground borne noise is not expected within the sound stage buildings, which are over 95m from the site boundary. Should vibration intensive equipment, such as rock hammers, vibratory rollers or compactors be required for the works, it is recommended that noise and vibration monitoring be carried out at commencement of these activities to assess potential impact onto the sound stage. This commitment is reflected in Mitigation Measure CM-NV5.

#### **Noise Management Plan**

The updated Impact Assessment at **Appendix F** is accompanied by an updated Noise Management Plan (NMP) detailing the future operation of events on the site. The NMP incorporates an alternative noise management framework that has been prepared as part of the design development and pre-consultation process for the new stadium and is proposed to replace the previous Notice of Preventative Action (1003904 18 January 2017) issued by EPA.

The NMP provides appropriate details on the intended operation of the stadium, noting that the NMP cannot be finalised prior to the determination of this application as it requires input from the detailed design development of the

stadium as part of the construction documentation stage of the project, and requires testing which relies on the operation of the stadium. A review of noise emissions following the commencement of stadium operations is to occur within nine (9) months of commencing operations on the site. This review will inform the final Noise Management Plan that will be finalised in consultation with Consent Authorities, relevant stakeholders and a suitably qualified acoustic consultant. Mitigation Measure D/O-NV3 reflects this commitment.

### 5.11 Crime and safety

Whilst not specifically requested by the Department or other agencies and authorities, the proponent has engaged Intelligent Risks to complete a peer review of the Crime Prevention Through Environmental Design report included at Appendix N of the EIS. This peer review provided at **Appendix O** validates the findings of the CPTED report and the recommended Mitigation Measures, confirming that the proposed development has generally achieved the principles of CPTED and as such will result in an appropriate design outcome for the site.

The Mitigation Measures nominated to address crime prevention in the EIS have been retained in the final Mitigation Measures in **Section 6.0**.

### 5.12 Contamination

The Department and EPA have requested further details regarding whether the site is suitable for its intended future use, including additional responses from the Site Auditor and an unexpected finds protocol.

#### Proponent's response

Section 6.12 of the EIS addressed the findings of the Detailed Site Investigation completed for the site by Douglas Partners and the Site Auditor Statement prepared by Senversa addressing these findings. Douglas Partners confirmed that the site was suitable for its intended use, and the Site Auditor Statement confirmed the validity of the imposed Mitigation Measures and outcomes of this assessment.

Notwithstanding, the revised statement at **Appendix D** confirms that an Interim Audit Advice or further statement will be provided at the appropriate stage, noting that is not possible to produce a Section A Site Audit Statement until all earthworks are completed and there are no further opportunities for unexpected finds. This will achieve the requirements of Condition C26 of SSD 9249, and the Department would be issued a copy of this information when available.

In order to appropriately manage the excavation phase of the development, Lendlease has prepared an unexpected finds protocol to be implemented in the event that an unexpected contaminant is found on the site, including the communications procedure for this occurrence (**Appendix E**). This unexpected finds protocol will be updated (as necessary) and implemented for the subsequent Stage 2 earthworks, as detailed in Mitigation Measure CM-CON3.

Through the implementation of the above safeguards contained in Condition C26 of SSD 9249 and the unexpected finds protocol referenced in Mitigation Measure CM-CON3, the Department may be satisfied that the site will be suitable for its intended use, whilst emphasising that this proposed development does not seek to change the existing use of the site.

## 6.0 Final mitigation measures

The final list of measures required to mitigate the impacts associated the proposed development are detailed in **Table 6** below. These mitigation measures are based upon those previously identified in the Section 8.0 of the EIS, with revised and additional mitigation measures included to reflect the additional information, clarification or response to submissions contained in this report and the accompanying technical studies. 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*.

**Table 6 Final Mitigation Measures**

Ref No.	Mitigation measure
<b><u>Design and operation</u></b>	
<b>D/O-BF</b>	<b>Built form</b>
D/O-BF1	Design development and the assessment of design integrity shall occur in accordance with the process outlined in the Design Excellence Strategy (2018) prepared by Infrastructure NSW and endorsed by the NSW Government Architect.
D/O-BF2	The detailed fit-out, operation, and signage for the tenancy and merchandise store are to be the subject of separate and future approval.
D/O-BF3	Details of the content, materiality, and illumination of signs within the stadium facade zones will be submitted to the Secretary for endorsement prior to the issue of the relevant Construction Certificate.
D/O-BF4	Detailed design of the public domain is to be coordinated with the design for the Moore Park Road separated cycleway, if the cycleway is progressed by Council and/or Transport for NSW before the issue of a Construction Certificate for the public domain works.
D/O-BF5	Detailed design of the public domain is to ensure the level application of bricks laid on a sand substrate or an appropriate alternative. Tactile markers are to be provided at the top and bottom of stairs in accordance with relevant access design codes.
D/O-BF6	Engage with the CPMP Trust with regard to potential improvements to pedestrian links between the Tibby Cotter Bridge and stadium, around Kippax Lake. This is to occur in concurrence with the detailed design of the stadium, noting that it would not be within Infrastructure NSW and/or the SCGS Trust's jurisdiction to obtain the necessary development approvals.
<b>D/O-TA</b>	<b>Transport and accessibility</b>
D/O-TA1	Traffic Management Plans will be developed where required, in consultation with key stakeholders such as NSW Police prior to special events occurring on the site, in order to manage vehicle and pedestrian movements before, during and after events, consistent with the existing arrangements.
D/O-TA2	The SCSSG Trust/ Infrastructure NSW will consult with TfNSW in determining the final Event Transport Management Plan for the stadium. This will include formal arrangements for dedicated taxi and rideshare locations, if appropriate.
D/O-TA3	The Green Travel Plan is to be finalised in consultation with TfNSW, with reference to the Plan prepared by Arup (31 May 2019), and implemented as part of the operation of the stadium. The Plan is to include provisions for a two-yearly review system to assess travel demand and make refinements to the initiatives.
D/O-TA4	SCSSG Trust will liaise with the Moore Park Transport Working Group and TfNSW on the development of the updated transport strategy (Moore Park Traffic and Transport Management Plan) for the Moore Park sporting precinct, including consideration of signage and wayfinding.
<b>D/O-HER</b>	<b>Heritage</b>
D/O-HER1	Prepare a detailed heritage interpretation plan confirming the final interpretative elements to be installed on the site with consideration of the following: <ul style="list-style-type: none"> <li>• The Heritage Interpretation Strategy prepared by Curio Projects (May 2019).</li> <li>• Coordination with public art.</li> <li>• Consultation with the, local Aboriginal community, the SCG Museum staff and SCSSG Trust.</li> </ul>
D/O-HER2	The La Perouse Local Aboriginal Lands Council should be consulted during preparation of the detailed heritage interpretation plan, in order to seek input into the plan with regard to Aboriginal cultural heritage significance.
<b>D/O-NV</b>	<b>Noise and vibration</b>
D/O-NV1	An initial noise desktop assessment of the entire external façade and ancillaries will be completed to assess the potential for wind induced noise from each element type at the detailed design stage. Consideration of aero-acoustic noise shall be considered with particular focus on the wind-induced noise mechanisms listed in Section

Ref No.	Mitigation measure
	4.3.5 of the Noise and Vibration Impact Assessment prepared by Arup (31 May 2019). Measures will be incorporated into the relevant Construction Certificate drawings as required.
D/O-NV2	Noise emissions from any external mechanical plant are to be treated such that noise emission complies with Noise Policy for Industry's project amenity noise level criteria at all surrounding receivers. This may require the use of acoustic louvres, enclosures, barriers or attenuators. Measures will be incorporated into the construction drawings as required.
D/O-NV3	A review of noise emissions following the commencement of stadium operations is to occur within nine (9) months of issuing the final Occupation Certificate. This review will inform the final Noise Management Plan in consultation with Consent Authorities, relevant stakeholders and a suitably qualified acoustic consultant.
<b>D/O-BIO</b>	<b>Biodiversity and trees</b>
D/O-BIO1	The artificial microbat roost structure will be provided as indicated in the Landscape Plans prepared by Aspect Studios.
D/O-BIO2	Infrastructure NSW and the appointed contractor should consult with the CPMP Trust prior to the commencement of operations to identify any practicable management measures to mitigate impacts of event crowds to mature figs and other associated vegetation around Kippax Lake.
<b>D/O-W</b>	<b>Waste</b>
D/O-W1	Prepare an operational waste management plan prior to operation for staff training and induction outlining the following: <ul style="list-style-type: none"> <li>• roles and responsibilities for all key stakeholders that will manage waste on site;</li> <li>• staff responsibilities including what materials are appropriate for each stream, the procedures involved in sorting, recommendations on how to minimise waste generation, and instructions on how to operate machinery safely;</li> <li>• data collection and the recycling and performance targets;</li> <li>• an annual review of on-site contamination rates by on-site staff, and disposal facilities through independent audits as necessary; and</li> <li>• appropriate communication channels for all stakeholders.</li> </ul>
<b>D/O-WF</b>	<b>Wayfinding</b>
D/O-WF1	The Trust will liaise with TfNSW prior to operation regarding announcements when alighting from the trains and appropriate messaging for commuters during event times, to assist in wayfinding from Central Station to the stadium.
D/O-WF2	The Trust will liaise with the CPMP Trust regarding the ongoing use of temporary variable message boards after major events to assist in crowd dispersal and wayfinding.
D/O-WF3	Internal wayfinding shall be detailed in the construction drawings with reference to the recommendations and material palette, signage typologies, typography, iconography, and map standards contained in Section 5 of the Wayfinding and Signage Strategy prepared by Aspect Studios (29 May 2019).
<b>D/O-PA</b>	<b>Public art</b>
D/O-PA	Engage a site-specific public art panel to review the procurement of public art, including heritage interpretation measures as necessary, in accordance with the Public Art Strategy prepared by Aspect Studios.
<b>D/O-L</b>	<b>Lighting</b>
D/O-L1	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.
<b>D/O-REF</b>	<b>Reflectivity</b>
D/O-REF1	All external materials and finishes that are visible from a public road and footpath are to have a spectral reflectivity of less than 20%.
<b>D/O-CM</b>	<b>Communications</b>
D/O-CM1	Infrastructure NSW and the SCSG Trust will participate in the Moore Park Working Group to ensure that the detailed design gives consideration to integration with the actions of other Working Group members.
D/O-CM2	Upon commencement of the operations of the stadium, details on the adult change facilities provided on-site will be submitted to the National Public Toilet map and included on the SFS website.
<b>D/O-SEC</b>	<b>Safety, security, and anti-social behaviour</b>
D/O-SEC1	Intelligent Risks, or a similarly qualified and experienced security consultant, will collaborate with designers during the preparation of construction plans to facilitate recommendations for security and risk mitigation.

Ref No.	Mitigation measure
D/O-SEC2	The stadium will be supported by Standard Operating Procedures (SOPs) and policies. Intelligent Risks, the SCSG Trust, security contractors, and NSW Police will collaborate in the development of SOPs for the stadium. The Trust will be responsible for ensuring that SOPs and associated documents are drafted, and implementing a program to regularly review and update as necessary
D/O-SEC3	A CCTV network for the site is to be designed and installed in consultation with a suitably qualified security consultant with a Class 2A licence under the <i>Security Industry Act 1997</i> to monitor the site. Signage is to be installed at site entries advising visitors that CCTV is in operation throughout the precinct
D/O-SEC4	A lighting strategy is to be designed and implemented in consultation with a suitably qualified lighting expert to ensure that the CCTV network is effective, and the building and public domain will be lit during the night including: <ul style="list-style-type: none"> <li>• Precinct entries and exits</li> <li>• Building entries and exits</li> <li>• Pathways</li> <li>• Stairs and lifts</li> <li>• Signage</li> <li>• Carparking lighting to the relevant Australian Standards</li> </ul>
D/O-SEC5	The following specific measures are to be included in the final detailed construction drawings: <ul style="list-style-type: none"> <li>• Use of robust and graffiti resistant materials or coatings within the public realm and the ground floor facade</li> <li>• Integrate services such as external power and water within various part of the site to accommodate potential future events, markets or performances</li> <li>• Fencing to the south-eastern corner of the site is to be an open palisade style of an appropriate height to restrict access while allowing surveillance to be maintained throughout the precinct</li> <li>• Install wayfinding signage that indicates limitations of access around the southern edge of the stadium.</li> </ul>
D/O-SEC6	Develop a process for periodic reviews of the site once operational, to identify and implement rectification works that may arise from specific incidents to ensure the site continues to provide a safe and functional space for its intended use.
D/O-SEC7	The following security measures are to be incorporated into the management program for the site: <ul style="list-style-type: none"> <li>• Develop conditions of entry including prohibited and restricted items with regard to the recommendations of Anti-Social Behaviour Mitigation Plan in Section 6 of the Anti-Social Behaviour Mitigation Strategy dated 28 May 2019. These conditions of entry will be publicised at the venue and other appropriate platforms, such as the stadium website.</li> <li>• Schedule site maintenance and security patrols.</li> <li>• Develop conditions for the screening of items brought into the stadium.</li> </ul>
D/O-SEC8	An Alcohol Management Plan is to be prepared prior to the commencement of operations including the recommendations on alcohol management in the Anti-Social Behaviour Mitigation Plan in Section 6 of the Anti-Social Behaviour Mitigation Strategy (28 May 2019).
<b>D/O-FL</b>	<b>Flooding</b>
D/O-FL1	An emergency response plan is to be prepared prior to the commencement of stadium operation to detail flood evacuation routes from the stadium site. The plan should form part of staff induction and training programs.
<b>D/O-ESD</b>	<b>Sustainability</b>
D/O-ESD1	The detailed design of the stadium is to achieve a minimum of LEEDv4 Gold rating, with consideration of the initiatives in the Environmentally Sustainable Design Strategy (May, 2019), and will be certified prior to occupation.
D/O-ESD2	The reduction measures nominated in the Life Cycle Assessment (March 2019) are to be reviewed and considered during detailed design and prior to the issue of the relevant Construction Certificate, including a progressive assessment of operational energy and water.
<b>D/O-O</b>	<b>Operation</b>
D/O-O1	The number of concerts at the stadium is not to exceed six (6) per calendar year, with an average of four (4) per year over any rolling five (5) year period between the Sydney Football Stadium and Sydney Cricket Ground.
D/O-O2	The operation of the stadium will be governed by the continuance of the time restrictions for noisy activities as detailed in Table 9 of the EIS.
D/O-O3	The Event Management Strategy prepared by the Trust will be updated as necessary following the detailed design and construction of the stadium, and formalised and implemented for the operation of the stadium. This Plan will consider road closures.



Ref No.	Mitigation measure
<b>Construction management</b>	
CM-1	Prepare a detailed Construction Environmental Management Plan prior to the commencement of works on the site including all required technical management plans and with consideration of other nominated mitigation measures.
CM-2	The CEMP is to include a Dust Management Plan with consideration of the recommendations in Section 6 of the Air Quality Impact Assessment prepared by Wilkinson Murray (May 2019).
CM-3	The CEMP is to include details on the following as nominated requirements by NSW Police: <ul style="list-style-type: none"> <li>• Notification of any road closures during demolition and construction work.</li> <li>• Adequate lighting of the work site at night.</li> <li>• The work site to be secured at night or during periods of inactivity.</li> <li>• Security patrols of the work site by contracted licensed security guards.</li> <li>• All engineers, workers, visitors, security guards, etc be vetted and to follow instructions and warnings as stipulated in a formal induction process.</li> <li>• Police be offered a familiarisation tour of the work site.</li> <li>• Notification of any suspicious activity or objects in or around the work site during demolition and construction work.</li> <li>• A list of key contacts on the work site.</li> </ul>
CM-4	The CEMP is to include provisions for works to adhere to the <i>Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2014</i> , as relevant.
<b>CM-TA Transport and accessibility</b>	
CM-TA1	A detailed Construction Pedestrian and Traffic Management Plan and associated Traffic Control Plan(s) will be developed with the appointment contractor and the Sydney Coordination Office, confirming the detailed construction methodology and specific measures for safely managing construction traffic in the surrounding area.
CM-TA2	No roads or footpaths are to be obstructed as part of the proposed works.
CM-TA3	The appointed contractor will consult with TfNSW (Sydney Coordination Office) at regular intervals where construction of the new stadium overlaps with the duration of construction works for the Sydney Light Rail project.
CM-TA4	Construction works are to not occur during the 2 hours prior to the commencement of an event at the SCG, during the event, and for at least 2 hours after the conclusion of the event.
<b>CM-HER Heritage</b>	
CM-HER1	An archaeological induction is to be prepared for all on site contractors, particularly those involved in the bulk excavation works, to familiarise workers with the recommendations and practices outlined in the Archaeological Research Design and Excavation Methodology prepared by Curio Projects (May 2019), and the process should they encounter an unexpected archaeological resource.
CM-HER2	The detailed Construction Environmental Management Plan is to include details of periodic site visits by the project archaeologist during site works, to verify the nature of any subsurface deposit and assess the potential for any potential archaeological resource to exist and be impacted. In zones of moderate archaeological potential, a program of archaeological supervision is to be implemented. A program of archaeological salvage or monitoring is to be implemented if any significant archaeological resource is encountered during the development that alters the level of supervision required, as confirmed by the archaeologist.
CM-HER3	Prepare and educate all on site contractors on the Unexpected Heritage Finds Protocol and Unexpected Aboriginal Finds Policy. Should any suspected archaeological resource/relic be encountered, a stop works would be required in the area of the find, and the project archaeologist contacted.
CM-HER4	The detailed Construction Environmental Management Plan is to include details of the implementation of the Methodology Statement – Working Near Busby’s Bore (August 2018), and incorporate all necessary measures into the detailed Construction environmental Management Plan and site inductions as required. The heritage specific recommendations of the Noise and Vibration Impact Assessment prepared by Arup (31 May 2019) are also to be included.
<b>CM-NV Noise and vibration</b>	
CM-NV1	A Construction Noise and Vibration Management Plan shall be prepared, including the final details of the types of plant to be used and updated estimates of the likely levels of noise and the scheduling of activities. The Plan will have reference to the recommendations in the Draft Construction Noise and Vibration Management prepared by Arup (August 2019).
CM-NV3	‘Toolbox talks’ will be held at regular intervals as specified in the Construction Environmental Management Plan with contractors, including discussion of noise and vibration mitigation, monitoring and assessment. These topics will also be covered under induction processes.

<b>Ref No.</b>	<b>Mitigation measure</b>
CM-NV4	High noise activities will be programmed to occur during the daytime hours wherever possible. In the event that these works are approved to occur out-of-hours, noisy activities should be scheduled early in the night to minimise the impact on adjacent residents.
CM-NV5	The contractor will adhere to the minimum working distances in Table 23 of the Noise and Vibration Impact Assessment prepared by Arup (31 May 2019), and the Methodology Statement – Working Near Busby's Bore (August 2018). Should vibration intensive equipment, such as rock hammers, vibratory rollers or compactors be required at the eastern site boundary, it is recommended that monitoring be carried out at commencement of these activities to assess any potential impacts on sound stages within Fox Studios.
CM-NV6	The contractor is to detail intra-day respite periods for any highly intrusive activities, and a schedule of fortnightly (or any other agreed timescale) discussion with the Kira Child Care Centre and UTS to verify the appropriateness of the proposed respite periods.
<b>CM-BIO</b>	<b>Biodiversity and trees</b>
CM-BIO1	A Tree Protection Plan is to be prepared by the Project Arborist which assesses the degree of impact to any Tree Protection Zones and provides 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 Tree IQ (30 May 2019). Tree 125 and Tree 231 are to be retained and protected.
CM-BIO2	Infrastructure NSW and the appointed contractor should avoid impacts to street trees on both sides of Moore Park Road and vegetation in the centre median of Moore Park Road in the vicinity of the site wherever practical. The removal of the one nominated tree on Moore Park Road will occur only with the permission of the relevant land owner and in accordance with the terms of the final development consent.
CM-BIO3	Site inductions will include identifying those environmental features to be protected and measures that are to be implemented, including provisions for when fauna is found on site.
<b>CM-CON</b>	<b>Contamination and waste</b>
CM-CON1	Imported topsoil to the site is to meet the Recreational/ Recreational Open Space criteria defined in Schedule B1 of the <i>National Environmental Protection Measure, As Amended (2013)</i> .
CM-CON2	Any virgin excavated natural material classification should take into account historic and any additional results.
CM-CON3	The detailed Construction Environmental Management Plan must set-out clear protocols in the event of an unexpected find, with reference to the Unexpected Contamination Finds Protocol_V2.1 (June 2019) prepared by Lendlease.
CM-CON4	The preliminary waste classifications outlined in the Detailed Site Investigation (Contamination) prepared by Douglas Partners (May 2019) are to be amended based on any 'unexpected finds', where appropriate.
CM-CON5	Any waste transported off-site is waste classified in line with EPA guidelines and taken to an appropriately licensed facility.

## 7.0 Conclusion

The Applicant has reviewed each of the submissions made by members of the general public, community organisations, and State and local Government agencies. In response to issues raised in these submissions, as well as matters identified by the Department, the Applicant has undertaken further environmental assessment and provided clarification regarding the scope of the proposed development that is the subject of this planning application.

The redevelopment of the Sydney Football Stadium will deliver a significant piece of cultural and economic infrastructure to support Sydney's role as a world city and destination for national and international tourism in accordance with the NSW Stadia Strategy. The proposal will deliver a modern, globally competitive stadium that achieves the requirements for a Tier 1 stadium to meet the future sporting event needs of Sydney and NSW in accordance with the *NSW Stadia Strategy*.

The SSD DA for the Design, Construction and Operation of the new Sydney Football Stadium, as supplemented by this Response to Submissions, 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 final mitigation measures outlined in **Section 6.0** of this report, 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 Department is requested to complete its assessment of the project and recommend the project be approved by the Minister for Planning and Public Spaces.