

11 November 2020

2200144

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
12 Darcy Street,
Parramatta NSW 2150

Attn: Rebecca Sommer

Response to Submissions SSD-9835-MOD 2 Sydney Football Stadium – Fitness Facilities

We write on behalf of the Sydney Cricket and Sports Ground Trust (SCSGT) and Infrastructure NSW in response to matters raised by the Department of Planning, Industry and Environment (DPIE) in a request for additional information (RFI) letter issued 28 August 2020. The RFI is made in relation to Modification 2 (MOD 2) to State Significant Development (SSD) Development Application (DA) (SSD-9835) for the detailed design, construction and operation of new Stadium Fitness Facilities for the SCSGT Members as part of the Sydney Football Stadium (SFS) Redevelopment.

This response identifies and provides an assessment for each of the matters raised in the RFI and in the submissions received during the public exhibition period. It should be read in conjunction with Modification Application and all supporting information dated 27 July 2020. This response has been prepared in accordance with Section 55 of the *Environmental Planning and Assessment Regulations 2000* (EP&A Regulations).

This assessment is accompanied by the following:

- Revised Architectural Plans and addendum Design Statement prepared by COX Architecture (**Appendix A**);
- Revised Landscape Plans and addendum Design Statement prepared by Aspect Group (**Appendix B**);
- Addendum Design Integrity Panel assessment (**Appendix C**);
- Addendum Transport Assessment prepared by JMT Consulting (**Appendix D**);
- Updated Noise and Vibration Assessment prepared by Arup (**Appendix E**);
- Updated Flooding and Stormwater Management assessment prepared by Arup (**Appendix F**); and
- Bulk earthworks plan prepared by John Holland (**Appendix G**).

1.0 Proposed amendments to the application

Amendments to design

Whilst there is no proposed change to the overall project description, some design development has occurred since the submission of Modification 2 and changes are proposed in accordance with Section 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). These changes comprise minor architectural amendments to the façade and interiors along with minor changes to landscaping as illustrated in the updated plans at **Appendices A** and **B**, and comprise:

- Refining the building façade to take into account alterations to the plant room and mechanical louvre sizes and the balustrade to the fitness terrace, while retaining the sculptural ribbon detailing.

- Refining the footprint of the upper level of the building so that it provides full solar and weather coverage by replacing the pergola louvres to a metal deck roof construction, which also provides for zones for photovoltaic cells (discussed further below).
- Providing retractable awnings at the gym terrace level.
- Amending the ramp providing access to the Fitness Facilities from the concourse, noting that no change is proposed to the design of the approved stadium concourse itself, which allows for the SFS ramps running from the SCG concourse to the Walk of Honour.
- Raising the internal courtyard to the east of the outdoor pool, which is also provided with stairs and a ramp to the pool deck area. This raised area will overlook the pool and have access to the SCG concourse.
- Relocating the building lift and stairs across each of the building floors, and associated minor changes, to provide an unencumbered void to the ground floor café in the levels above.
- Providing photovoltaic cell zones for the future installation of panels on the pergola and the cabana roof. The final capacity and location of the system will be confirmed during detailed design.
- Repositioning the trees proposed to be planted in the café courtyard, in the south eastern corner of facilities site, and on the southern edge of the Moore Park Terrace stairs, with the number of planted trees to remain the same.

The proposed minor changes to architectural detailing are shown in **Figures 1 to 4** below.

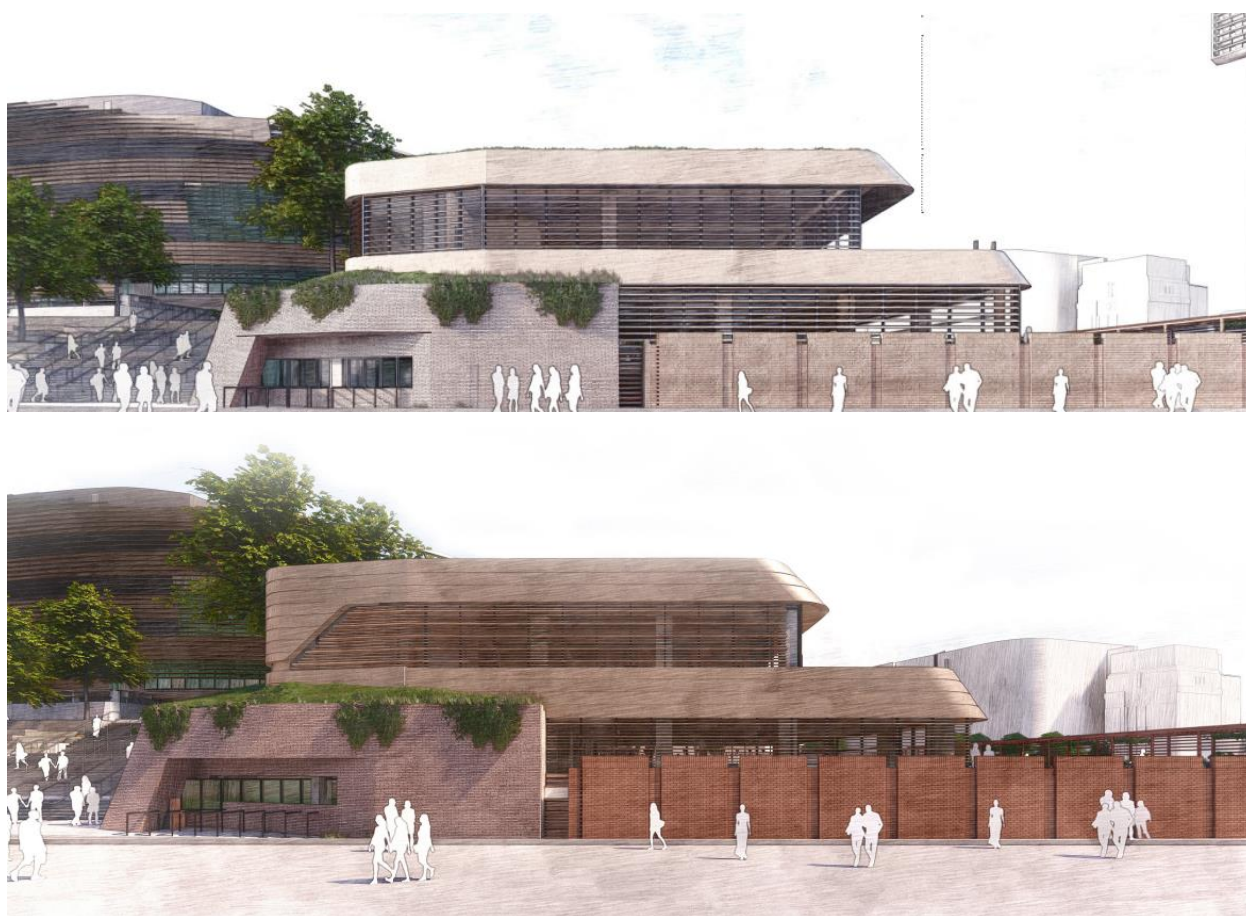


Figure 1 Comparison of exhibited (top) and proposed (bottom) detailing as viewed from Driver Avenue

Source: COX Architecture



Figure 2 Illustration of the exhibited (top) and proposed (bottom) facilities in context

Source: COX Architecture

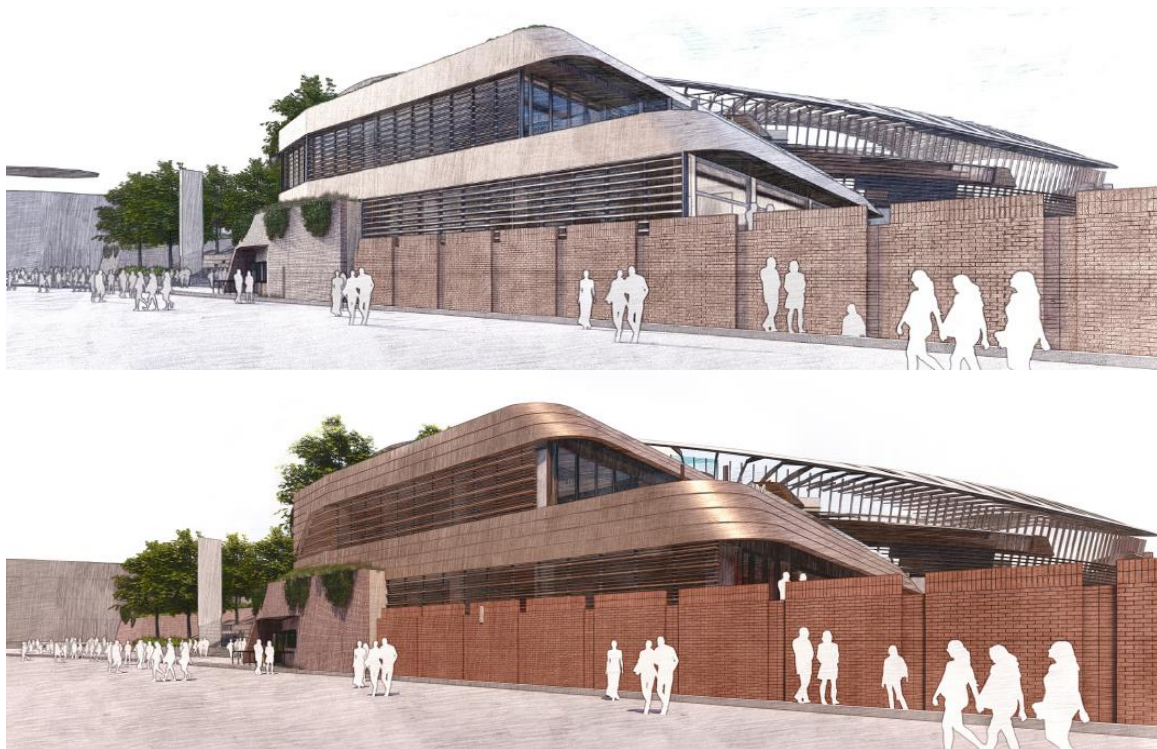


Figure 3 Illustration of the exhibited (top) and proposed (bottom) facilities, as viewed from Driver Avenue looking north east

Source: COX Architecture



Figure 4 The exhibited (top) and proposed (bottom) facilities, as viewed from the concourse looking south

Source: COX Architecture

Amendments to operation

In response to the submissions received (discussed in detail in **Section 2.0**), the SCSGT has clarified the intended operation of the Stadium Fitness Facilities. Consistent with the arrangements in place at the former Stadium Fitness Facilities (prior to demolition), members and their guests will be able to access the Facilities prior to, during, and after events including for social gathering and event-related functions to complement the operations of the Stadium. Social gatherings and functions accessed by the broader public are not proposed.

Access to the facilities

The Stadium Fitness Facilities will be used by members of the Sydney Cricket and Sports Ground. Membership is available to anyone and the Gold and Platinum membership categories include access to the fitness facilities for membership holders and their guests. Access to the facilities by any other SCSGT partners will be by invitation only, within the proposed operating hours, and subject to the maximum capacity of the facilities discussed further below. Social gatherings and functions accessed by the broader public are not proposed.

Capacity

The maximum occupation of the facility is dictated by the spatial allowance in each discrete area. However, the maximum occupation is highly unlikely to occur as specific functional capacity in each area is limited by acceptable density resulting from gym equipment placement, amenity numbers, and furniture placement.

The proposed Facilities will be accessible to existing and future SCSGT Members and guests, with typical utilisation across the facility of 500 people at any one time, however recognising that the facility has a maximum functional capacity of approximately 1,000 persons (rounded up from 993). This predicted maximum capacity is based on the spatial allowance in each area as identified in the breakdown below:

Main Gym + Functional Area

Members on cardio = 92
Members on weighted machines = 30
Dumbbell area members (10 benches plus standing) = Estimated 18
Functional area rig members = Estimated 8
Squat rack members = Estimated 4
Sub-Total = 152 members

Group Exercise Spaces

Cycle Studio = 36 members
Group x 1 (Mind Body Studio) = 24 members
Group x 2 (Main Studio) = 24 members
Sub-Total= 84 members

Wet areas indoor:

Sauna = 10 members
Spa = 20 members
Steam = 10 members
Sub-Total= 40 Members

Pools:

50m Pool - Max 51 Members
25m pool – Max 23 members
Cabanas: people max = 30
Sub-Total = 104 members

Change Rooms:

Dry Change Males = 8 showers + 8 toilets + 10 changing = 26 members
Dry Change Females = 8 showers + 8 toilets + 10 changing = 26 members
Wet Change Males = 4 showers + 6 toilets + 6 changing = 16 members
Wet Change Females = 4 showers + 6 toilets + 6 changing = 16 members
Sub-Total= 84 Members

Miscellaneous spaces:

Lobby= 10 members
Virtual Golf = 4 members
Day Spa + Lounge= 4 beds + 4 in lounge space= 8 members
Child Minding (dedicated to children of members attending the facility) = 15 Children
Squash = 8 members
Sub-Total= 45 members

Café: indoor and outdoor area

Based on seat density = **284 members**

Roof Terrace

Based on 2m egress width = **200 members**

Accordingly, the main gym and functional areas have a measured capacity of 509 persons given the current equipment layout, while the café and rooftop areas have a measured capacity of 484 persons. Based on historical information, attendance to the fitness portion of facilities is limited during sporting and live entertainment events as typically members do not attend the facility for fitness alone on game day. Vice versa, it is also unlikely that all outdoor areas will be operating at full capacity in conjunction with the gym equipment and internal areas. Historical data indicates that the purpose for members accessing the Facilities changes over the course of the day/week. This

means that gym classes and workouts typically occur during parts of the day that do not coincide with events/functions. Consequently, whilst the theoretical maximum capacity of the facility is 993 persons, it is highly unlikely that this maximum occupancy would ever be reached and day-to-day occupancy rates would be well below this maximum.

The roof terrace, pool side, and café areas would typically be used by members for recreation, lounging, socialising. These spaces may also be used by member and/or SCSGT partners in conjunction with events in the SFS and/or SCG, or used to host member functions discussed below.

Hours and functions (frequency of occupation)

The proposed operating hours are generally consistent with Condition A19 of SSD 9835, and make provision for wind down, cleaning, etc. It is appropriate that the Stadium Fitness Facilities are open for the duration of events at the main stadium and provide for an earlier opening time for access to the gym and fitness facilities. The operating hours are proposed to be:

- 5.30am and 11:30pm Monday to Friday;
- 6am and 11:30pm on Saturdays; and
- 7am and 11pm on Sundays.

Within these operating hours, the Main Gym and Functional Area, Group Exercise Spaces, Golf and Squash Courts, Pools, Wet Areas and Change Rooms will all be accessible during opening hours. Members will arrive and depart via the Lobby and typically move around the Facility using different pieces of equipment and utilising the various classes and amenities, including the Day Spa and Lounge and Child-Minding services on offer. Group Exercise Classes are timetabled (averaging 6 classes per day) while the remaining facilities and amenities (Pools, Spa, Golf and Courts) are not time restricted with members using these facilities at their leisure and for however long they wish to.

The types of functions to be held are consistent with those hosted at the former fitness facilities. The majority of these functions would occur as pre-match services in conjunction with events being held in the SFS and/or SCG, and include guest speakers and a food and beverage service. Outside of the use of the Fitness Facilities during SFS and/or SCG event days, these spaces may also be used for the Members' Christmas Party, club gatherings (such as the Tennis Club annual awards), corporate partner gatherings, sports partner functions high-teas, lunches, networking functions, BBQs, panel Q&A type events, art appreciation functions, charity events and fundraisers and the like.

Functions could occur on weekdays or weekends and will occur wholly within the proposed operating hours which are governed by the approved SFS operating hours. Pre-event functions would typically have a duration of under 2 hours, while standalone functions would typically operate for 4 hours.

Importantly all events/functions will be by invitation only and for members and their guests only. No portion of the Stadium Fitness Facilities including the café and roof terrace will be available for hire by the general public for functions/events.

2.0 Response to submissions

The Modification Application was publicly exhibited between 7 August and 20 August 2020 and fifteen (15) submissions were received in response, comprising ten (10) from authorities and agencies, two (2) from organisations and special interest groups, and three (3) from the general public.

No authority or agency objected to the proposed amendments. Further, NSW Health and the Department of Transport did not provide any comment or request additional information.

Each of the matters raised in the submissions received (except for those that raised no objection or comment) have been addressed in the table overleaf, and discussed further where relevant in **Section 3** of this assessment.

Table 1 Response to submissions

Extract	Response
AGENCIES AND AUTHORITIES	
Department of Planning, Industry and Environment	
Construction The Department requests additional information in relation to excavations (depth, volume of cut/fill) required to facilitate the construction of the Stadium Fitness Facilities, particularly in relation to the basement plant.	A bulk earthworks plan detailing cut and fill has been prepared by Aurecon and provided at Appendix G. The plan demonstrates that the proposed modification will necessitate approximately 4,200m³ of additional cut and a modest approximately 780m³ of additional fill to provide for the new building integrated with the stadium.
Construction traffic and parking Noting the additional construction jobs created by the proposed modification (~120), provide detail of the arrival times and the number of the additional construction vehicles accessing the site and detail as to where all construction vehicles will be accommodated and how impacts to the surrounding road network and community will be minimised. This should also consider the cumulative impacts of the overall SFS development.	By way of background, a detailed construction traffic pedestrian management plan (CTPMP) was developed for the Sydney Football Stadium Redevelopment project and was most recently endorsed by TfNSW in July 2020. The TfNSW endorsed CPTMP already considers the implications of between 130 to 160 daily heavy vehicles on the road network as a result of the construction of the SFS. In consultation with the appointed contractor, John Holland, JMT Consulting has prepared an addendum Transport Assessment provided at Appendix D which confirms the daily truck activities including arrival times during the weekday and weekend. The addendum Transport Assessment also confirms the construction of the SFF will adopt the same construction methodology as that already endorsed for the construction of the main stadium, including access/egress points, queuing and marshalling (entirely within the site) and traffic / pedestrian control measures. In addition, the addendum Transport Assessment has considered the cumulative impacts of the SFS and SFF construction. It confirms that the expected peak construction resourcing profile will occur during stage four of the SFS redevelopment project, prior to construction commencing for the Stadium Fitness Facilities. Accordingly, even when the resourcing peaks for the Stadium Fitness Facilities, the cumulative resource numbers for the main stadium and the Fitness Facilities construction will not exceed the peak number of construction workers attributed to the stadium alone during stage four. This peak period is already managed and accounted for in the Construction Worker Transportation Strategy (CWTS) prepared in accordance with Condition B35 of the consent, as well as the detailed Construction Traffic Pedestrian Management Plan (CTPMP) developed for the construction of the stadium and endorsed by TfNSW earlier in 2020. The principal contractor, John Holland, has also appointed a communications and stakeholder manager who is responsible for all communications with the surrounding community and stakeholders. This will include managing and actioning any complaints, providing regular project updates, and ensuring workers are aware of responsibilities.

Extract	Response
Traffic Clarification is sought with regards to the additional traffic that would be accessing the SFS site outside of times of major events, including peak weekday periods for the purposes of utilising the fitness facilities and attending functions and events held in addition to the operation of major events at the stadium.	Section 4.2 of the addendum Transport Assessment at Appendix D confirms that those attending the Stadium Fitness Facilities are expected to generate an additional 51 vehicle trips between 9am-10am. The traffic modelling confirmed that these additional movements will not significantly impact the operation of the road network, with intersections to retain an acceptable level of service. Further, the Assessment confirms that approximately 163 vehicle movements could be generated on arrival and departure to the Stadium Fitness Facilities during functions, 75 of which are private vehicles that would park in the precinct. This level of vehicular activity is no greater than that forecast by the Stadium Fitness Facilities for a typical weekday and weekend as previously analysed in the Transport Assessment supporting the exhibited modification proposal. Consequently, 500 person functions (being 484 capacity within the café and roof terrace areas plus staff) at the Stadium Fitness Facilities would have no greater traffic impacts compared with that already considered and would not compromise the adjacent transport network. The addendum Transport Assessment has also considered functions that might occur during double header events.. Importantly function guests would already be attending an event in the Moore Park Precinct on event days, and as such it is assumed that they would not generate additional demands on the transport network. The addendum Transport Assessment has also demonstrated that even in a worse case scenario where a function was hosted at the Stadium Fitness facilities on a non-event day for the Stadium, and it was assumed 100% of attendees drove to the function, the road network is able to accommodate the expected traffic movements. Parking has also been considered and demonstrated to be sufficient as discussed below. Therefore, no impacts to the road network or adjacent parking facilities would arise from these functions.
Parking Clarification on parking demand and supply to facilitate the additional 500 patrons of the facility, particularly during major events held at the stadium and when events are held in the surrounding precincts. This should also detail parking requirements for the ongoing use of the fitness facilities and for functions and events held in conjunction with, but separate to main stadium events.	Section 4.3 of the addendum Transport Assessment at Appendix D confirms that there will be an ongoing demand from the users of the Stadium Fitness Facilities for 201 vehicles during the peak weekday demand, 191 during the peak weekend demand, and 75 vehicles during functions. Peak parking demand on weekdays and weekends is experienced between 7am-10am which does not coincide with stadium event times at the SFS or SCG. Parking demand at the SFF gradually reduces into the afternoon and evening periods which is the typically when stadium events are held. Consistent with the operation of the former Stadium Fitness Facilities on the site, members utilising the Stadium Fitness Facilities will park in the MP1 carpark with 540 spaces available. Alternatively, parking is available in the wider precinct with capacity for 2,000 cars. This is consistent with the operation of the previous members' facility where alternate parking arrangements were provided during events at the SFS or SCG. No additional parking is warranted or will be provided as part of the reinstatement of the Stadium Fitness Facilities.
Functions and Events Provide additional detail of the types of functions and timing of events that are in addition to those linked to the operation of the stadium. This should include, but not be limited to, detail of the types of events,	The Stadium Fitness Facilities will be accessible to existing and future SCSGT Members and guests, with up to 1,000 (rounded up from 993) people may be accommodated. Social gatherings and functions accessed by the broader public are not proposed.

Extract	Response
frequency, number of patrons, and whether amplified sound would be utilised in indoor and/or outdoor areas.	The types of functions to be held are consistent with those hosted by the former facilities that existed on the site and were demolished as part of the SFS redevelopment, and include the Members' Christmas Party, club gatherings (such as the Tennis Club annual awards), corporate partner gatherings, sports partner functions high-teas, lunches, networking functions and BBQs. Functions could be hosted indoors, poolside, or on the rooftop depending on nature, size, and time of year, and may be held in support of SFS and SCG events. Functions could occur on weekdays or weekends and will occur wholly within the proposed operating hours which are governed by the approved SFS operating hours. The operating hours are proposed to be: • 5.30am and 11:30pm Monday to Friday; • 6am and 11:30pm on Saturdays; and • 7am and 11pm on Sundays. The proposed operating hours are generally consistent with Condition A19 of SSD 9835, and make provision for wind-down, cleaning, etc. It is appropriate that the Stadium Fitness Facilities are open for the duration of events at the stadium, and are open earlier to provide access to the gym facilities before work. As detailed in the addendum Noise and Vibration Assessment (Appendix E), noise emissions that could be associated with the operation of the Stadium Fitness Facilities comprise amplified music and noise generated by patron use of outdoor areas. Results show predicted worst case noise levels due to the operation of the Stadium Fitness Facilities comply with the event and non-event Stadium Fitness Facilities noise limits, established as 10 dB below noise limits for the main stadium. This demonstrates noise impacts associated with the Stadium Fitness Facilities operation are predicted to be insignificant.

Extract	Response
Landscaping Provide amended plans detailing changes to landscaping around the stadium precinct as a result of the Stadium Fitness Facilities.	Aspect Studios has prepared updated Landscaped Plans and a Design Report at Appendix B. The proposed changes to landscaping as a result of the Stadium Fitness Facilities are the same as those described in the planning statement and comprise: • Three (3) skylights installed in the north and south abutments and central planting zone of the Moore Park Terrace to enable daylight access to the facilities located beneath the approved entrance stairs. These skylights are minor and are integrated into the landscape design in these areas. • Planter boxes installed around the edge of the accessible building roof, linking the building to the parkland and creating visual interest. Planting will comprise a mixture of native and exotic species ranging in size and texture. • Mass planting around the perimeter of the ground floor pool deck, including a shade structure (cabana) and tree planting in the south east corner. • Planting of a net additional three (3) trees above and beyond what has already been approved under SSD 9835, equating to 120 trees overall. The proposed landscaping response is consistent with the concurrent proposed modifications to the Stage 1 Concept Approval (SSD-9249).
DPIE Environment, Energy and Science Group	
Biodiversity Under section 7.17 of the Biodiversity Conservation Act 2016, applications for the modification of major projects must be accompanied by a biodiversity development assessment report unless the consent authority is satisfied that the modification will not increase the impact on biodiversity values. To assist Planning and Assessment Group in making this decision, EES understands that the site is developed and cleared of vegetation and buildings and so the modification is unlikely to any impact on biodiversity.	Noted. The proposed modification will not increase the impact on biodiversity values as detailed in the planning statement prepared for MOD 5 to SSD-9249 which assessed the proposed increase to the site boundary to accommodate the Stadium Fitness Facilities. • The Concept Proposal and Stage 1 DA was accompanied by a Biodiversity Development Assessment Report (BDAR) prepared by Jacobs. A waiver was subsequently issued in relation to the Stage 2 SSD DA on the grounds of the development being unlikely to impact biodiversity values in accordance with Clause 1.5 of the <i>Biodiversity Conservation Act 2016</i> and Clause 1.4 of the <i>Biodiversity Conservation Regulation 2017</i>. • The BDAR included a review of existing information regarding threatened species, populations and communities within a 10km radius of the site and a field survey to review the findings of the background research, including vegetation surveys and a habitat assessment on the identified list of threatened flora and fauna species know or predicted to occur in the subregion. The 'Study Area' for the BDAR included the additional land that is to be occupied by the Stadium Fitness Facilities. • The BDAR confirmed that the site had been heavily modified from its original state and that there was little natural terrestrial vegetation in the locality. In view of this, Jacobs confirmed that there were no threatened ecological communities located in or directly adjacent to the development site, and that the vegetation on site was not a suitable habitat for any threatened or migratory species.

Extract	Response
	The proposal did not require the preparation of an offset strategy for the purchase and retirement of biodiversity credits. A waiver was subsequently issued in relation to the Stage 2 SSD DA confirming that no further assessment was required. The land to which this modification relates comprises a turfed tennis court, cricket practice area, and masonry wall; no vegetation forms part of this land. A portion of this land formed part of the original approved site boundary, and the remaining portions of land were considered in the Study Area by Jacobs in the BDAR. The proposed modification, therefore, does not change the findings of this assessment and does not require further verification.
Flooding Flood impact assessment modelling is required but has not been completed. There is the potential for increased flood impacts on the new facilities and possible impacts elsewhere. The new facilities are in the path of overland flow and the relocation of the existing gates to Driver Avenue will change flood behaviour. Not only building footprints, but any other permanent works need to be considered, including new fencing and walls shown in architectural drawings. For example, flood behaviour would likely to be substantially altered around the proposed outdoor swimming pool as the connection to Driver Avenue via gates appears to be lost due to new boundary walls. This could increase the flood levels at the fitness facilities or stadium entries above the levels previously designed for.	Section 5.2 of the updated flooding and stormwater assessment prepared by Arup at Appendix F provides updated flood modelling which includes the Stadium Fitness Facilities outdoor areas and the pool. The modelling confirms: - The original design intent is unaffected by the addition of the Stadium Fitness Facilities and the concourse design remains unchanged. - The development does not result in adverse flood impacts in the 1% AEP event in this area. - The small extension to the built form as a result of the Stadium Fitness Facilities blocks a small portion of the flow path that runs from west to east. As a consequence, the extent of flooding is decreased at the cricket practice area south of the Fitness Facilities, and increased at the south-eastern edge of the stadium by 0.05m in depth. This small increase does not result in increased flood risk and is not located at a building entrance and is, therefore, deemed acceptable. No changes are proposed to fences or walls, which are proposed to be rebuilt in their current form and location. The flood modelling has adopted this assumption.
Post development scenario flood modelling is required but has not been completed. This is required for the purpose of determining local flood levels that will dictate finished floor levels of the fitness facilities.	The updated flooding and stormwater assessment at Appendix F confirms that post-development flood modelling will be undertaken as part of the detailed design and construction phase of the project. The finished floor levels will be established at a suitable elevation about the peak flood levels derived from the updated modelling together with a suitable freeboard allowance. This will offer passive protection and mitigate risk, in addition to adhering to the City of Sydney Interim Floodplain Management Policy. A suitably worded condition of consent is recommended, in addition to the imposition of a new Mitigation Measure D/O-FL2 (see Section 4.0).
Proposed changes to trunk drainage have not been modelled but it needs to be demonstrated that these do not have an impact on flooding conditions. Similarly, the resultant flood levels are required to inform floor levels.	Updates to the trunk drainage infrastructure as part of the SFSR project have been incorporated in the base model assessed in Section 5.2 of the Flooding and Stormwater assessment at Appendix F and pose no concerns.

Extract	Response
Onsite detention tank needs to be resized for new development for proof of concept given that the works are already under construction and the ability to make modifications is compromised.	The updated flood modelling confirms that the proposed Stadium Fitness Facilities do not result in adverse flood impacts. As such, it is not necessary to alter the OSD volumes or peak off-site discharge rates. The total OSD provided by the SFS redevelopment is significantly higher than the Sydney Water Notice of Requirements minimum OSD storage requirement of 777m³ for the development. Therefore, compliance with the Sydney Water requirements for OSD is achieved. Similarly, compliance with the City of Sydney Council requirement to not worsen downstream flooding conditions is also achieved. Condition B47 of SSD-9835 will continue to apply to the Stadium Fitness Facilities, requiring the preparation of an Operational Stormwater Management System. This Plan has already been prepared and approved by the certifying authority prior to the release of the relevant Crown Certificate for the construction of the Stadium. An addendum to that Plan can be prepared prior to construction of the Stadium Fitness Facilities, if considered necessary.
NSW EPA	
Chapter 7.1 of the NVA states that “no external mechanical plant or equipment is proposed.” Clarification should be provided on this statement with an appropriate assessment of any mechanical plant, equipment or any other noise source associated with the operation of the fitness facility.	As the proposed Stadium Fitness Facilities have been designed to integrate with the SFS redevelopment, no additional external plant or equipment is required to be installed as part of the modification. Any plant and equipment required to operate the proposed facilities can be accommodated within the building envelope.
The modification introduces sources of noise which may operate during events and non-events, that are not covered by any conditions in the current Consent – e.g. patron and amplified sound noise not associated with the stadium. The EPA recommends acoustic controls are implemented in the Consent for noise sources at the fitness facility. It is suggested this be done by amending Condition E2 (non-event operational noise limits), so that noise limits in Table 1 of E2 apply to the combined noise level from non-event noise sources, and all noise sources at the Fitness Facility, at all times.	As the proposed Stadium Fitness Facilities have been designed to integrate with the SFS redevelopment, no additional external plant or equipment is required to be installed as part of the modification. Any plant and equipment required to operate the proposed facilities can be accommodated within the building envelope. The updated Noise and Vibration Assessment prepared by Arup at Appendix E reiterates this.
Further clarification should be provided regarding the proposed use of the café for outdoor entertainment activities. As the Department of Planning, Industry and Environment is aware, the Sydney Cricket and Sports Ground Trust lands – including the Sydney Football Stadium – are subject to the statutory Notice of Prevention Action 1003904 issued under the Protection of the Environment Operations Act 1997. This Notice applies to entertainment activities – including concerts, festivals, cinematic and theatrical events – carried on outdoors, involving the use of sound amplification equipment where there are 200 or more people. The Notice limits the nature and frequency of various types of outdoor entertainment activities held on Trust lands and, as such, the café will also be subject to the Notice.	The updated Noise and Vibration Assessment at Appendix E assesses the operation of the proposed Stadium Fitness Facilities against Condition E2, and confirms that the reinstated Stadium Fitness Facilities will comply with these non-event operational noise limits.
NSW Heritage – Aboriginal Cultural Heritage	
We support the recommendations under section 6.2 of the Addendum Heritage Impact Statement including; • Extending the 'Supervision Zone' established in the ACHMP to cover the area of the proposed modification 2 footprint for all excavation and development works. • The Aboriginal archaeological management of the proposed modification 2 footprint to be in accordance with the methodology and measures outlined under section 8 of the ACHMP. Revising the ACHMP if this modification is approved.	Noted.

Extract	Response
NSW Heritage – European Heritage	
The proposed amendments do not occur within the SHR curtilage of Sydney Cricket Ground – Members Stand and Lady Members Stand. However, the proposed fitness facility would impact on the greater setting of the SHR item and on views to and from the SHR listed members stand. The proposed boundary amendment would encroach on Lot 12, DP 1255013, which includes the SHR item Sydney Cricket Ground – Members Stand and Lady Members Stand. However, it is noted that most of the use of the amended proposal in the vicinity of the Members Stand is used for managing crowd entry. It is recommended that this facility be designed to mitigate any visual impact by keeping the enclosures as transparent as possible.	The proposed Stadium Fitness Facilities has been assessed by the Design Integrity Panel and Curio Projects, which confirms that the proposed reinstated facilities will achieve design excellence and appropriately mitigates visual impacts through being visually consistent with the form and established character of the Precinct including the approved stadium design and form. The integration of the majority of the form and bulk of the Stadium Fitness Facility within the approved stadium concourse reduces the prominence of this structure in its setting.
The Addendum HIS also investigates the archaeological potential of the area, part of which was outside the study area for the original assessment. It indicates that there is low to very low historical archaeological potential. This assessment and the inclusion of this area in the unexpected finds archaeological management requirements for the project is appropriate.	Noted.
Transport for NSW (RMS)	
Submission recommends imposition of the following conditions of consent: • Prior to the issue of the Construction Certificate the applicant shall update the Construction Pedestrian and Traffic Management Plan (CPTMP) endorsed for the Sydney Football Stadium works by TfNSW in July 2020 to reflect the proposed modification and submit it to TfNSW for endorsement via development.sco@transport.nsw.gov.au. • The applicant shall include details of any events or functions which would be held in the Stadium Members Facility when developing the Event Traffic and Transport Management Plan required under conditions D16 and D17 of approved SSD-9835. Please contact development.sco@transport.nsw.gov.au for further information. • The applicant shall include the details of any wayfinding and signage requirements in consultation with TfNSW for the Stadium Members Facility when developing the Wayfinding and Signage Plan required under conditions D22 and D23 of approved SSD-9835. Please contact development.sco@transport.nsw.gov.au for further information.	The addendum Transport Assessment provided at Appendix D provides a detailed response to each proposed conditions.
Sydney Water	
• Sydney Water has no objection to the proposal, however, we request that the proponent lodges a Feasibility study with Sydney Water for the proposed development prior to lodging a Section 73 Application. • The proponent should contact a Water Servicing Coordinator to lodge this study on their behalf. • Sydney Water requires the proponent to provide specific details of intended water usage and wastewater loads and connections points for the proposed development. • Any potential upsizing of our local assets or limitations in our system will be defined with the Feasibility process.	Noted.

Extract	Response
City of Sydney Council	
The City maintains the long-held view that public land at Moore Park should be preserved for public uses. It is disappointing that the proposal, which seeks to extend the approved stadium boundaries for private members' facilities will not benefit the local community more broadly.	No works are proposed to Moore Park as a result of the proposed modification. All proposed works are located within the boundaries of SCSGT land. The Stadium Fitness Facilities are also located within an area that is not publicly accessible and was reserved for use by the SCG, and which were previously used for Member's fitness facilities prior to the commencement of the SFS Redevelopment. The proposed development, therefore, utilises controlled SCSGT land to deliver a new facility that better responds to and activates the Driver Avenue frontage of the site and Moore Park. The proposed development will not impact the environmental and operational conditions of Moore Park and associated recreational activities, and will reinstate facilities that operated in conjunction with the former, demolished stadium on the site.
Urban Design The design has been through the required Design Integrity Panel process and the Panel minutes submitted with the application indicate that the architects were to explore retractable awnings on the fitness facility roof. There appears to be no retractable awnings on the documentation. It is unclear as to why these have not been included and not discussed in the Architectural Design Statement. Given the roof area would accommodate approximately 80-100 people, appropriate sun shading and weather protection structures are critical. It is recommended that further information regarding retractable awnings be explored, as suggested by the Panel.	The revised plans at Appendix A include retractable awnings at the gym terrace level, to provide additional shading of the primary café/pool outdoor area. The roof terrace level has also been amended from a pergola to a metal deck roof so that a greater area is rain and solar protected for patrons. Further solar protection could be provided on an event basis through provision of temporary umbrellas or equivalent.
The Sustainability discussion within the submitted Architectural Design Statement outlines that the heat island effect will be minimised through a light-coloured roof and paving, landscaping and shaded areas. The architectural and landscape documentation make no reference to detailed materials and finishes, which reflect the stated commitments. It is recommended that a condition requiring light coloured roofing and paving to the Stadium Fitness Facility and its surrounding landscaped areas be imposed to assist in minimising the heat island effect	Pages 18 of the updated Design Report prepared by COX Architecture details the materials and finishes to be implemented in the Stadium Fitness Facilities. This includes pale pavers for the roof terrace and grey pavers for the pool terrace.
Heritage The Stadium Fitness Facility is to be located to the north of the Gate A entrance to the Sydney Cricket Ground at the end the existing brick wall to Driver Avenue. There will be some demolition of this wall, construction of a new wall and relocation of the Arthur Morris Gates, which will allow for a separation between the old and new walls. There will be some physical impact to the fabric of the northern section of the Driver Avenue boundary wall, with partial demolition, relocation of the 2015 Arthur Morris Gates, and construction of a new section of brick wall. The changes are proposed to integrate the facility to the wider site. Whilst this wall has been altered overtime it has retained its overall form, general alignment defining the SCG and SFS site, and its red brick character, which reflects the strong identity of Driver Avenue. According to the Heritage Impact Statement, the new wall would follow the same scale and rhythm of 'pier and bay' using similar bricks, but this does not appear to be detailed in the submitted documentation. Therefore, it is recommended that conditions of consent be imposed requiring detailed drawings at a scale of 1:20 or 1:50 of the design of the new boundary wall adjoining the relocated gate, including the brick detailing and piers, with input from the applicant's heritage consultant. A detailed schedule of external	Proposed Mitigation Measure D/O-HER3 will require the preparation of detailed drawings of the design of the new boundary wall adjoining the relocated gate, including the brick detailing and piers, with input from the applicant's heritage consultant as requested by Council.

Extract	Response
material finishes and colours, which include the type and colour of bricks to be used in the brick boundary wall, should be submitted and is to be similar in colour and detailing to that in the retained section of the existing wall. It is also advised that the recommendations made in relation to archaeology in the Addendum Heritage Impact Statement prepared by Curio Projects be endorsed.	
Traffic and transport The submitted Traffic Impact Statement, prepared by JMT Consulting, suggests that there will be an additional 45 vehicles generated by the development per hour during weekday peak hours to that already considered under the SFS development application. The submitted intersection modelling shows that this generated traffic could be accommodated within the streets without compromising the intersection performance and Level of Service (LoS) significantly. However, as previously mentioned for the SFS application with respect to the capacity and frequency of events, the precinct and adjacent road network would experience traffic congestion more frequently. A stronger commitment from the proponent is required to proactively reduce reliance on private vehicle use and the on-site car parking provisions to achieve the sustainable transport outcome of the overall SFS site.	The proposed modification will not significantly impact the operation of the road network with intersections to retain an acceptable level of service. The addendum Transport Assessment (Appendix D) confirms that the traffic levels will be in line with what they were prior to the demolition of the SFS and the associated Fitness Facilities. A comprehensive Green Travel Plan (GTP) was prepared as part of the approval for Stage 2 of the SFS Redevelopment (SSD 9835). The GTP was prepared in consultation with TfNSW and the Council with the objective of reducing reliance on private vehicle as a mode of access to the site. A suite of measures were proposed in the GTP to achieve this objective including: • provision of bicycle parking and end of trip facilities • improved travel information for staff and visitors • improved wayfinding to public transport and walking routes • no increase in car parking in the precinct compared to current levels. Conditions D14 and D15 require the Green Travel Plan to be updated and endorsed by the Coordinator General, Transport Coordination within 6 months of the stadium's operation. Condition D14 requires the GTP also include specific tools and actions to help achieve the objectives and mode share targets. It is noted that the long-term parking strategy for the greater Moore Park Precinct is required to be addressed in the Event Car Parking Management Plan (ECMP) required by Condition D50. This ECMP is required to consider the likely timeline of the progressive removal of on-grass car parking on Moore Park East, in consultation with the Centennial Park and Moore Park Trust. Accordingly, Council's request for the proactive reduction in the reliance on private vehicles is already embedded in the consent.
The proposal does not include any bicycle spaces and is proposed to use the 150 bicycle spaces approved for the SFS application. This new facility would have a cafe with 250 people capacity and approximately 500 people at any single time. Therefore, it is recommended that at least 5% of the required bicycle and facilities be provided. This equates to approximately 25 bicycle parking spaces, 5 showers and change area and 30 lockers to be provided as part of the development's end of trip facilities. With infrastructure recently installed by the State Government and City of Sydney Council to make cycling and walking into the city safer and more convenient, it is expected that a more concerted effort to promote sustainable transport would be made by the proponent.	The addendum Transport Assessment at Appendix D confirms that the demand for bicycle parking generated by the Stadium Fitness Facilities will occur on non-event days, and will not coincide with the peak usage associated with visitors to the stadium or event staff. Patrons visiting the Stadium Fitness Facilities on event days will also typically be attending the events, and as such the patronage of these bicycle parking spaces has already been accounted for. The provision of (at least) 150 bicycle parking spaces near the site entry points will be sufficient to accommodate the demand generated by Stadium Fitness Facilities users.
The Traffic Statement suggests that the management of loading and servicing would be developed and integrated with the SFS loading and service management plan, which is acceptable to the City. Therefore, a condition of consent should be recommended to this effect.	Noted.

Extract	Response
Environmentally Sustainable Design (ESD) To maximise the overall environmental performance of the development, Australian contemporary standards should be employed. With respect to water efficient fixtures and fittings, the installation of 3 stars rated shower heads with flow rates of 6 LPM under the Australian WELS rating scheme would minimise the development's water usage.	The ESD Statement exhibited with the application identifies the target initiatives to achieve LEED v4, as required under Conditions B20 and E1, which include 3 Star WELS rated showers, 4 Star WELS rated toilets, and 5 Star WELS rated taps.
Management regimes should also be considered for the use and operation of the outdoor pool so as to prevent water loss from evaporation. A simple measure of applying an outdoor pool cover overnight and when not in use would assist with water saving.	The ESD Statement exhibited with the application identifies that the development will implement pool covers to minimise pool water evaporation.
The submitted ESD report states that captured rainwater is to be used for toilet flushing, irrigation and wash down. The City considers that 'in-building' use for toilet flushing and swimming pool top up to be the most valuable water uses to substitute potable and non potable supply.	The captured rainwater is envisaged to be used for toilet flushing, irrigation and wash down. Pool covers will assist in minimising pool water evaporation.
Further, the ESD report specifies that the increased energy consumption of the new fitness facility will be further investigated to utilise the Stadium's on-site photovoltaic energy production to offset its own energy consumption. The DPIE must ensure that a condition of consent be imposed to require the final capacity and location of the collective photovoltaic system consider the energy consumption generated by the new fitness facility.	The Architectural Plans at Appendix A detail the area for photovoltaic cells to be installed on the cabana rooftop for the Stadium Fitness Facilities. The final capacity and location of the system will be confirmed during detailed design, and an appropriate condition of consent can be imposed to this effect in accordance with Conditions B7 and B20.

Extract	Response
Centennial Park and Moore Park Trust	
Visual Impact While the proposed building envelope for the Members Fitness Facility in SSD 9249 Modification 5 and the detailed design of the facility which this provides for in SSD 9835 Modification 2 would be built entirely on SCSGT land and would not encroach on CPMP lands, we would like to put forward recommendations to minimize visual impact on the adjoining public domain. Although much of the proposed members facility will be out of sight behind the boundary wall and in the undercroft space beneath the main entry stairs to the stadium off Driver Avenue, a significant proportion of the building will still be visible above the wall. It is acknowledged that the architectural detailing in the building's design (particularly its articulation and materiality) aims to blend in with the appearance of the stadium. Accordingly, when viewed at some distance from the Moore Park open space opposite (eg around the Kippax Lake area) it would not be overly conspicuous when set against the mass of the new stadium behind and would be reasonably visually integrated with this backdrop. However, from the street level it could read as a three-storey building. Its form and bulk would have an imposing presence on Driver Avenue in the immediate vicinity and diminish the strong definition of the boundary fence along Driver Avenue in this location. Our view is that these impacts could be mitigated by modifying the upper levels of the proposed Members Facility, so the mass of the building is shifted back closer to the stadium and its surrounding concourse to achieve a more sympathetic visual transition from the stadium to the boundary fence.	• The built form and scale of the proposed facilities is addressed in the Architectural Design Statement and Design Integrity Panel Assessment submitted with the Modification Application. The facilities have been designed to be complementary to the scale and architectural design of the stadium and incorporate additional landscaping. The Design Integrity Panel has reviewed the proposal and endorsed the bulk and scale of the proposed Stadium Fitness Facilities stating that the reverse view of the site from the park will be improved by the Fitness Facility structure serving to break up the scale of the stadium. It is further noted that the Stadium Fitness Facilities have been designed to sit largely within the existing under-croft space beneath the Moore Park Terrace entrance stairs and is modest in the setting of the neighbouring stadia, and will be screened by the dominant brick wall that exists along the Driver Avenue frontage of the site as well as site landscaping. • All views of the Stadium Fitness Facilities will be in the context of the approved SFS and existing SCG, which are larger and more prominent buildings within the view corridors. That is to say, views will remain largely unchanged from that of the approved SSD, and will not present any additional visual impact to the views and vistas to the SFS and SCG. • The upper level design of the Stadium Fitness Facilities ensures that egress paths for the stadium and the Bradman Noble Stand are maintained, and will not impede the delivery of future pedestrian links between the SFS site and Fox Studios consistent with the vision in the greater precinct under the Moore Park Master Plan 2040. Shifting this upper level to be closer to the stadium could compromise stadium entrances and pedestrian pathways, essential for access and egress. • The proposed rooftop pergola is in the eastern extent of the Stadium Fitness Facilities rooftop, and will be partially screened by rooftop planter boxes, ensuring that this third storey element is separated from the Driver Avenue frontage of the site where possible and is visually recessive.
Construction Impacts Should this project proceed it is important that during the construction phase there is nil or negligible impact on Trust land and activities. Our detailed submissions to the original State Significant Development Applications for Stage 1 (SSD 9249) and Stage 2 (SSD 9835) outline requested mitigation measures to avoid construction issues for CPMP and these should apply equally to the Modification proposal for SSD 9835.	The imposed conditions of consent controlling construction will continue to apply to the modified development.
ORGANISATIONS	
Saving Sydney's Trees	
OBJECTION TO MODIFICATION. As Representative of Saving Sydney's Trees Inc. An Association that has over 12 thousand Database and a FaceBook following of well over 10 Thousand and more dependent on issues. Having been founded by the public in relation to the CSELR Failed Project and Needless Environmental negatives resulting, we voice our OBJECTION. This Modification must be rejected.	Noted.

Extract	Response
This "Amendment" to the scale and Footprint, is a Breach of Consent Conditions. We make note that Stage 1 is also such a Breach. Evidenced in the Height and required removal of 26 Very Significant trees. These provide Habitat and Amenity to the existing area. The Public and the Wildlife that this particular Centennial Park and Moore Park Parklands Area provide, makes this Design and Amendment abhorrent to intended purpose of this Parkland to the Public of NSW with COVID placing new and ongoing importance to its PRESERVATION and PROTECTION for ALL of the General Public for generations to come. The application by 'The Applicant'- Infrastructure and Planning NSW seems to have not reflected these demands here. Instead resulting in an application to extend the depletion of the Parklands for the Paid Membership restrictions to that General Public. As the Body of Review here - "Department Planning, Industry and Environment" we strongly urge you to review this entire plan.	• The proposed Modification Application does not seek to remove any additional trees. The Stadium Fitness Facilities will result in an overall net increase of three (3) trees to be planted on site beyond what has been approved under SSD 9835, equating to 120 trees to be planted as a result of the development. This represents a significant replacement ratio over three trees planted for every one removed. • Two significant trees will continue to be retained and protected, being the significant mature fig tree in the north west corner of the site (Tree 125) and a second fig tree in the north east corner of the site. These trees have high landscape value and a life span of 15-40+ years. • The proposed Stadium Fitness Facilities also do not encroach on any land that is managed by the CPMPT or that is publicly accessible. The Stadium Fitness Facilities are largely integrated with the approved stadium structure and are located on land that has been in the management of the Sydney Cricket Ground since the 1850s. This land was occupied by the former Indoor Cricket Centre, and comprises part of the secure SCG practice wickets and tennis court. • Membership of the Sydney Cricket Ground is open to all residents of NSW. The proposed Stadium Fitness Facilities will reinstate heavily utilised community facilities that are not replicated in other nearby areas.
At the time of first draft the NSW Government and assessment teams were unable to assess the Environmental and indeed Infrastructure Disadvantages and Depletion to Area and transport that the CBD and South East Light Rail would bring...This now with COVID make all consideration as to the appropriateness of ANY rebuild on this site in need of review. Any Further Depletion of Environmental Assets to a now recognised UNABLE to OFFSET Position, MUST be assessed and disallowed. The SEARs requirement on ALL of this also did not take into account the then unfinished WestConnex and the Further depletion in the Whole of Sydney of quality detriment due to the removal of Thousands of significant Canopy and green space provisions. On Making any suggestion to Rebuild Infrastructure NSW has seemed to FAIL the Public of NSW by not evaluating and scoping for a Better Placement of a NEW Facility.	• The proposed Modification Application does not seek to remove any additional trees beyond the approved development, and proposes to plant an additional three trees on the site when compare to the approved scheme. • Tree removal associated with the Sydney Light Rail and Westconnex is outside of the scope of this application. • The reinstatement of fitness facilities on the site as part of the SFS Redevelopment aligns with the legacy and character of the site, being the third such sporting and community facility including the Sydney Sports Ground (1899-1986) and the former Sydney Football Stadium (1988-2018).
We present that given the enormous event impacts on Moore Park and surrounding roads and the Public and Existing Residents who regularly are displaced from their Area due to Congestion and Socially undesirable events that seem to accompany such Events. That access to the West Connex roadways might have seen Existing and disused and acquirable Hard Surface Industrial space towards Alexandria and Botany investigated for a better all round Future Result.	The proposed Stadium Fitness Facilities will not result in any significant new or adverse environmental impacts, including with regard to construction and operational noise and vibration, construction and operation traffic or the capacity of the transport network, stormwater and flooding, heritage and archaeology, and overshadowing, privacy or visual impacts. The proposed facilities do not alter the approved capacity and operation of the stadium and surrounding public domain areas, including the types, occurrence, and management of events.
Homebush, with its underutilised and OLYMPICS PROVEN abilities left unattended by Finance that gives illegitimate weight to this Controversial ALLIANZ STADIUM Rebuild.	The reinstatement of fitness facilities on the site as part of the SFS Redevelopment aligns with the legacy and character of the site, being the third such sporting and community facility including the Sydney Sports Ground (1899-1986) and the former Sydney Football Stadium (1988-2018). The stadium and ancillary facilities are complementary to the facilities at Sydney Olympic Park, rather than as an alternative, in accordance with the NSW Stadia Strategy.

Extract	Response
• We Strongly and emphatically urge you to review the ALLIANZ STADIUM Build; • Conduct a New/ Relevant and Current SEARs Assessment with COVID and CLIMATE and \$\$\$\$ and Ability to Offer in area Fully Accounted now that surrounding "works" mentioned are completed and • Scope and Cost Alternative sites and More appropriate Spending; • Restore this area to General Public recreational and Free Access in line with CLIMATE and AIR QUALITY Requirements. DO NOT ENCROACH ON THESE PARKLANDS (as the Consent Conditions Demand and recognise)	Refer to the discussions above. It is emphasised that the proposed Stadium Fitness Facilities are largely integrated with the approved stadium structure and are located on land that has been in the management of the Sydney Cricket Ground since the 1850s, ensuring that the proposed development does not impede any surrounding open space or public areas. The proposed Stadium Fitness Facilities will reinstate heavily utilised community facilities that are not replicated in other nearby areas.
Paddington Society	
One of the Society's objectives is to preserve existing open spaces and expand these for the health and enjoyment of our community. Moore Park is a green public asset of heritage and environmental significance, and its parkland value needs to be respected. The proposed facilities are a substantial development on public land, entirely for the private benefit of members and the SCGSGT, but they impact on the public domain of Moore Park East and the Driver Avenue streetscape, with their 15m high building envelope, mostly without a setback to Driver Avenue. These facilities are an expansion on the previous Fitness Centre, which was largely single storey, though it's not clear how much bigger, and they include a new rooftop function space for up to 100 people. All this adds bulk and visual impact on the parkland surrounds.	• All proposed works are located within the boundaries of SCGSGT land. The Stadium Fitness Facilities have been designed to largely occupy the vacant under-croft space below the SFS entry stairs, and will utilise land that has not been open to the public and was occupied by the former Indoor Cricket Centre, SCG practice wickets, and tennis court. This land was not publicly accessible and was reserved for use by the SCG. The proposed development, therefore, utilises controlled SCGSGT land and does not impede or otherwise impact Moore Park. • The reinstated facilities are enhanced from the previous facilities existing as part of the SFS, however, this increase in size is attributed to ensuring the new facilities reflect contemporary standards and the expectations of all members and users. This does not directly translate to a proportionate increase in new Stadium Fitness Facilities members. • The built form and scale of the proposed facilities is addressed in the Architectural Design Statement and Design Integrity Panel Assessment submitted with the Modification Application. It is noted that the Stadium Fitness Facilities have been designed to sit largely within the existing under-croft space beneath the Moore Park Terrace entrance stairs. The component of the facilities visible from the surrounding area is compatible in scale to the existing NRL Building, and modest in the setting of the neighbouring stadia, and will be screened by the dominant brick wall that exists along the Driver Avenue frontage of the site.
The lack of a masterplan for the SCGSGT - managed land shows a lack of duty of care by the Trust for this land - buildings are erected piecemeal with no overall urban design guidelines such as heights, setbacks, landscaping (results of this are seen in the previous poor buildings built on Moore Park Rd) - this facility is just the next building to come along, with no overall vision. Also, the proposal is silent on where facilities displaced by it – cricket, tennis and BBQ facilities, will go - so that the community is concerned that there are more modifications to come. There seems to be little recognition of the need to sensitively interface with the heritage context of the Trust-managed lands.	• The Modification Application has been developed with consideration of the site-specific Urban Design Guidelines created to guide development on the site, as well as the vision for the greater precinct under the <i>Moore Park Master Plan 2040</i>. • The Modification Application was accompanied by an Addendum Heritage Impact Statement prepared by Curio Projects assessing the proposal against its heritage context. It confirms that the proposed development is not intrusive for surrounding heritage items, including the SCGSGT land, and does not present any additional visual impact. Overall, the Stadium Fitness Facilities are visually consistent with the form and established character of the approved stadium design and form.

Extract	Response
The proposal looks too high, top heavy and cluttered from many viewpoints, with a substantial 'pergola' structure on the top floor and heavy fascia elements at all levels, and brings more building bulk forward to viewers from Moore Park, and even detracts from the appreciation of the geometric Stadium shape. The proposal does not fulfil the stated design concept of the building as being a 'modest pavilion' 'predominately 1 storey in height' 'largely screened from Driver Avenue by the existing brick wall' (refer to Planning Statement and Architectural Design Statement).	The proposed Stadium Fitness Facilities were developed in consultation with the Design Integrity Panel who confirmed that the design aligns with the scheme presented during the competition process and that design excellence is maintained. The proposed modifications are consistent with the Panel's review of the competition design in relation to the Sydney LEP 2012, the objectives of <i>Better Placed</i>, and the project-specific Urban Design Guidelines, and do not alter the Panel's conclusion that the design demonstrates design excellence.
The design would be improved, and be closer to the concept, by removing the top 'pergola' structure (there is a terrace below which can be used for functions), by setting the 2nd Concourse Level floor well back from Driver Avenue edge, to make it visually recessive, by lowering floor to floor heights and by planting out the entire roof for stormwater reduction and visual amenity when looking across from Moore Park and down from the main Stadium.	• The built form and scale of the proposed facilities is addressed in the Architectural Design Statement and Design Integrity Panel Assessment submitted with the Modification Application. It is noted that the Stadium Fitness Facilities have been designed to sit largely within the existing under-croft space beneath the Moore Park Terrace entrance stairs. The component of the facilities visible from the surrounding area is compatible in scale to the existing NRL Building, and modest in the setting of the neighbouring stadia, and will be screened by the dominant brick wall that exists along the Driver Avenue frontage of the site. • As detailed in the Landscape Plans and statement prepared by Aspect Studios, landscaping has been integrated into the Stadium Fitness Facilities and its associated outdoor areas to integrate the building with its parkland setting and enhance amenity. Planter boxes are to be installed around the edge of the accessible building roof, linking the building to the parkland.
The removal of part of the brick wall on Driver Avenue is unfortunate from a heritage viewpoint, and it seems there were no alternatives explored. A successful reconstruction of the wall as a contemporary contrast will be very dependent on the details, and there should be a heritage oversight of this detail at a later stage.	The works were assessed as part of the Addendum Heritage Impact Statement prepared by Curio Projects. The reconstructed brick wall and relocated Arthur Morris Gates will ensure that the existing approach to the site and arrival experience remains unchanged. Mitigation Measure D/O-HER3 is proposed that will require the preparation of detailed drawings of the design of the new boundary wall adjoining the relocated gate, including the brick detailing and piers, with input from the applicant's heritage consultant as requested by City of Sydney Council.

Extract	Response
GENERAL PUBLIC	
Community member – Claire May Please accept the following as my submission OBJECTION. The DA needs be re exhibited as the modifications on exhibit are significant. • loss of public land • major increase in traffic, which requires new traffic modelling • major departure to the original design • reduction of the tree canopy replacement • scale will have negative impact on local area and significantly affect views and vistas • intrusion on our public parklands for private use • the public should have the opportunity to see full design and also study the impacts	• All proposed works are located within the boundaries of SCSGT land. The Stadium Fitness Facilities have been designed to largely occupy the vacant under-croft space below the SFS entry stairs, and will utilise land that has not been open to the public and was occupied by the former Indoor Cricket Centre, SCG practice wickets, and tennis court. This land was not publicly accessible and was reserved for use by the SCG. The proposed development, therefore, utilises controlled SCSGT land and does not impede or otherwise impact Moore Park. • The Stadium Fitness Facilities were subject to traffic modelling addressing the cumulative traffic movements resulting from the approved stadium and the proposed Stadium Fitness Facilities during the PM peak hour, being the most critical period for road operation as determined under the Concept Proposal. This modelling confirmed that the proposal will not significantly impact the operation of the road network. The intersections of Driver Avenue and Moore Park, and Driver Avenue and Lang Road, will continue to operate at acceptable levels of service. • The development, as proposed to be modified, is substantially the same development as that originally approved. The proposed Stadium Fitness Facilities themselves relate to and complement the vision established in the Concept Proposal for the provision of a new stadium and associated public domain areas, and sensitively integrate with the approved design of the stadium and public domain areas. The proposed facilities have also historically operated in conjunction with the former stadium in this location, and as such remain suitable for the site. • The Modification Application does not seek to remove any additional trees. The Stadium Fitness Facilities will result in an overall net increase of three (3) trees to be planted on site beyond what has been approved under SSD 9835, equating to 120 trees to be planted as a result of the development. This represents a significant replacement ratio over three trees planted for every one removed. • The built form and scale of the proposed facilities is addressed in the Architectural Design Statement and Design Integrity Panel Assessment submitted with the Modification Application. It is noted that the Stadium Fitness Facilities have been designed to sit largely within the existing under-croft space beneath the Moore Park Terrace entrance stairs. The component of the facilities visible from the surrounding area is compatible in scale to the existing NRL Building, and modest in the setting of the neighbouring stadia, and will be screened by the dominant brick wall that exists along the Driver Avenue frontage of the site. • The Stadium Fitness Facilities are not located on publicly accessible land or open space. • The Modification Application was publicly exhibited between 7 August and 20 August 2020, including all plans and technical assessments.

Extract	Response
Community member – Maria Bradley Please accept the following as my submission OBJECTION. • The modifications on exhibition are so significant and affect the public interest, that the DA should be re exhibited. • There is a significant loss of public land • Significant increase in traffic that new traffic modelling and studies need to be conducted and displayed • Opportunistic modification which is a significant departure to the original design • Impacts on the tree canopy replacement • Bulk , scale will have negative impact on neighbouring residents and the public and affect views and vistas as well as light and noise pollution • Greater encroachment on heritage public parklands for private use • Failure of proponent to include in the original design - the public needs the opportunity to see full design and impacts	Refer to the discussion above.
Community member – Graham Bradley This project is a NSW State Government debacle on which I am totally opposed, as I have previously advised. The NSW State Government is "lucky" that it can "afford" to squander community resources and to such an extent. However, it is also disturbing that the NSW State Government cannot distinguish between what is important and what is not. There are so many crucial community service priorities of health, education, low-income housing, and the need to address climate change before squandering community resources on sport. Therefore, for the NSW State Government to seek to squander further community resources is absurd and an insult to the community. To redeem itself, the NSW State Government needs to immediately stop this project and cut any further resource losses to the community.	The project expenditure decision is a matter for the NSW Government and is not relevant to the planning assessment process.

3.0 Additional information and environmental assessment

Updates to the detailed design and assessment of the proposed modification has occurred in response to submissions received. This is detailed in the relevant appendices of this report and in the responses in **Section 2.0** above. Notwithstanding, the following sections address key aspects of those responses where additional information or assessment has been provided in support of that lodged with the EIS.

3.1 Design integrity

An amended Design Integrity Statement (**Appendix C**) has been prepared to reflect the design changes made to the proposal as a result of minor design development. The assessment confirms that the Design Integrity Panel considers that the developments to the proposed scheme does not alter the Panel's conclusion that the proposal 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.

As detailed in the updated Design Reports at **Appendix A** and **Appendix B** of the Stadium Fitness Facilities, the proposed amendments to the detailing of the Stadium Fitness Facilities and associated public domain areas comprise minor design development in response to the submissions received and to provide for an improved functional design.

The Stadium Fitness Facilities will continue to utilise the same materials and finishes palette as the approved stadium, and the architectural detailing of the proposed building will still reflect the sculptural ribbon facade of the approved stadium. Landscaping surrounding the proposed Stadium Fitness Facilities and on the roof will tie the proposed building to the concourse and the stadium public domain, and reinforce the connection of the precinct to the parklands. The provision of additional shade structures and zones for the installation of photovoltaic cells will support amenity and sustainability.

3.2 Ongoing and operational impacts

The assessments prepared to accompany the exhibited MOD 2 application as well as those appended to this response to submissions, demonstrate that the operation of the proposed Stadium Fitness Facilities will not result in any significant new or adverse environmental impacts. This includes the operation of the fitness areas, café, and any typical functions held either in conjunction with or outside of SCG and SFS events, which are consistent with those hosted by the former Members' club that existed on the site.

The following is a summary of the ongoing and operational impacts of the reinstatement of the Stadium Fitness Facilities to the site:

- Noise levels from the operation of the Stadium Fitness Facilities will comply with the event and non-event Stadium Fitness Facilities noise limits, established as 10 dB below noise limits for the main stadium (see **Appendix E**). This demonstrates noise impacts due to the Stadium Fitness Facilities operation are predicted to be insignificant. The development will continue to operate as per the operational conditions in SSD 9835 (which do not require modification) as well as the statutory Notice of Prevention Action 1003904 issued under the *Protection of the Environment Operations Act 1997*.
- Modelling of the cumulative traffic movements, parking demands, public transport access, and loading and servicing by Arup confirms that the Stadium Fitness Facilities can be comfortably accommodated on the site and operate with minor additional demands (see **Appendix D**). The proposed facilities will be subject to the comprehensive Green Travel Plan (GTP) that has been prepared and is to be updated and endorsed by the Coordinator General, Transport Coordination within 6 months of the stadium's operation per Conditions D14 and D15, as well as the long-term parking strategy for the greater Moore Park Precinct required by Condition D50. The requirement to prepare a Service Area and Loading Dock Management Plan prior to occupation under Condition D29 of the consent will apply to the Stadium Fitness Facilities.

- The flood impact assessment has demonstrated that the Stadium Fitness Facilities do not result in adverse flood impacts on the surrounding area and changes to on-site detention is not required (see **Appendix F**). Development is capable of complying with the City of Sydney Interim Floodplain Management Policy and will be subject to the Emergency Flood Evacuation Management Plan required under Condition D30 of the consent.
- The modified development will continue to target an achieve a Gold LEED v4 rating, in accordance with Conditions B20 and E1 and will implement additional ESD measures in response to the submissions received (see **Appendix G**).
- There will be no new or additional overshadowing of Moore Park as a result of the modification. The shadows cast by the Stadium Fitness Facility sit within the approved stadium shadows, due to it being located south west of the stadium and having a low overall height. There will be very minor additional overshadowing of the SCG practice wickets, which are short-lived and gone by midday during the worst-case instance of mid-winter (21 June). Accordingly, the proposed facilities will not impact the amenity of any nearby residences, adjoining recreation areas including Kippax Lake, or the SCG field of play (see **Appendix A**).
- The visual impacts resulting from the proposed Stadium Fitness Facility are of low significance and are consistent with the visual impacts approved as part of the Stage 2 SSD DA. The proposed massing of the new structure is comparable to the previous Stadium Services and Cricket NSW (ICC) building in this location, and compatible with the scale of the adjacent NRL Building. The Fitness Facilities primarily utilise the existing undercroft space beneath the Moore Park Terrace entrance stairs and will be screened by the reconstructed brick wall on Driver Avenue (see Appendix G of the exhibited statement and **Appendix A** of this response).
- The proposed Stadium Fitness Facilities are visually consistent with the form and established character of the approved stadium design and form and as such will have an overall neutral impact within the heritage precinct. The Fitness Facilities will be subject to the Heritage Interpretation Strategy prepared under Conditions B46 and D9 (see Appendix I of the exhibited statement).
- The reinstatement of the Stadium Fitness Facilities to the site in a similar location would also result in only minimal social change and is unlikely to amplify existing impacts or generate additional impacts beyond those identified and approved as part of the previous assessments and frameworks developed for site. The proposed development does not necessitate changing the existing conditions of consent for Stage 2 of the project, or imposing new conditions of consent with regard to social impact (see Appendix H of the exhibited statement).
- Some additional economic benefit is likely due to the increased amenity provided by larger and more modern facilities, however, the majority of the additional floorspace is attributed to uses that already existed at the former site. Accordingly, as comparable facilities existed on site previously, the net increase as a result of the current proposal will be minimal (see Appendix H of the exhibited statement).
- The proposed development can comply with the 2010 Disability (Access to Premises–Buildings) Standards and the National Construction Code, noting that further assessment will be completed at the detailed design stage, in accordance with Conditions B7 and AN4 of the consent (see Appendix F of the exhibited statement).

3.3 Construction impacts

The proposed development will also not result in any new significant or additional construction impacts. The construction works on the site associated with the proposed Stadium Fitness Facilities will occur in accordance with the existing management measures including:

- The Construction Noise and Vibration Management Plan that was approved by the Secretary on 19 March 2020 (Condition B28).
- The controls for vibration intensive activities and impacts on heritage structures, including Busby's Bore, specified in the conditions of consent (Condition C19).
- The methodology and measures outlined under Section 8 of the Aboriginal Cultural Heritage Management Plan (ACHMP), developed in accordance with Condition B41. The 'Supervision Zone' established in the ACHMP will be extended to cover the area of the proposed modification 2 footprint for all excavation and development works as supported by NSW Heritage.

- The 'Unexpected Finds' management strategy as detailed in Section 7 of the Construction Heritage Management Plan (CHMP), developed in accordance with Condition B39.
- The detailed construction traffic pedestrian management plan (CTPMP) that was developed for the Sydney Football Stadium Redevelopment project and endorsed by Transport for NSW earlier in 2020, as per Conditions B31 to B34. The construction of the proposed Stadium Fitness Facilities will be consistent with the methodology and protocols of this endorsed CTPMP, noting that the CTPMP also already accounts for the expected peak construction vehicle demand of both the Stadium Fitness Facilities and the stadium. Nonetheless, the CTPMP can be amended to incorporate the Fitness Facilities which can be addressed through a suitably worded condition of consent.
- The Construction Worker Transportation Strategy prepared in accordance with Condition B35, which confirmed the provision of sufficient parking facilities or other travel arrangements for construction workers and also accounted for the peak construction resourcing profile of both the Stadium Fitness Facilities and the stadium.

The construction of the proposed Stadium Fitness Facilities can, therefore, be appropriately managed in accordance with the existing framework and will not result in any notable additional or new environmental impacts. The proposed Fitness Facilities will be constructed in conjunction with the approved stadium, and are intended to commence operating at the same time as the stadium.

4.0 Mitigation Measures

Detailed discussions concerning the mitigation measures and strategies identified in the consent for SSD 9835 are addressed in the appended technical assessments. Notwithstanding, the following additional mitigation measures are proposed as part of this application to address specific matters that were raised in the submissions received:

Ref No.	Mitigation measure
<u>Design and operation</u>	
D/O-HER	Heritage
D/O-HER3	Prior to the commencement of demolition or construction works associated with the demolition of the boundary wall and relocation of Arthur Morris Gates, detailed drawings will be prepared at a scale of 1:20 or 1:50 for the design of the new boundary wall adjoining the relocated gate, including the brick detailing and piers. The drawings will be prepared in consultation with Curio Projects, or a suitably qualified heritage consultant.
D/O-FL	Flooding
D/O-FL2	Prior to the commencement of construction works associated with the Stadium Fitness Facilities, post-development flood modelling is to be undertaken to confirm the finished floor levels are of a suitable elevation above peak flood levels derived from the flood modelling together with a suitable freeboard allocated. Development must adhere to the City of Sydney Interim Floodplain Management Policy.

5.0 Conclusion

The Modification Application seeks consent for the detailed design, construction and operation of new Stadium Fitness Facilities for the SCSGT Members as part of the SFS Redevelopment. This represents a reinstatement of the facilities that formerly operated on the site in conjunction with the demolished stadium. The proposed Stadium Fitness Facilities will operate in a largely consistent manner as the former facilities but in accordance with the improved and conditioned management framework applying to this site.

For the reasons addressed in this response, and those detailed in the exhibited planning statement, the proposed reinstatement of the facilities is considered to be appropriate and supportable and does not alter the development insofar as the matters identified by the Minister as the reasons for granting the original development consent.

In accordance with section 4.55(2) of the EP&A Act, the Minister may modify the consent as:

- the consent, as proposed to be modified, is substantially the same development as that originally approved; and
- the resultant environmental impacts are considered appropriate in the circumstance, and can be appropriately managed and mitigated.

Yours sincerely,



Anna Nowland
anowland@ethosurban.com



Michael Oliver