

2 December 2020

Our Ref: R/2019/2/F  
File No: 2020/539313  
Your Ref: SSD 9835 – MOD 2

Rebecca Sommer  
Principal Planning Officer  
Department of Planning, Industry and Environment

By Planning Portal

Dear Rebecca

**Response to Submissions – Modification 2 Stadium Members Facilities – Sydney Football Stadium (SSD 9835)**

Thank you for your correspondence dated 17 November 2020 requesting for the City of Sydney Council (“the City”) to comment on the Response to Submissions (RTS) for the Sydney Football Stadium (SFS) Stage 2 development. The proposal relates to a modification involving the detailed design, construction and operation for new Stadium Fitness Facilities.

The RTS demonstrates minor amendments to the façade and interior of the Stadium Fitness Facilities building. Additional details with respect to the landscaping and operational aspects of the development is also provided. Whilst the City generally provides no further comments to the architectural amendments, the following matters are raised for further consideration:

**1. Environmentally Sustainable Design (ESD)**

The response provided by the proponent with respect to the ESD is generally acceptable. However, the City reiterates previous comments made regarding water consumption. In sports facilities, water consumption for showers is likely to be one of the most significant end uses of main potable water. 3-star rated showerheads vary considerably in efficiency as there are 4 subcategories of performance. All leading manufacturers of commercial shower heads make models that deliver excellent service that perform in the 6 to 7.5 litres per minute category. Showers delivering more than 7.5 litres per minute, while they may be 3-star rates, do not demonstrate best contemporary practice. Higher performance should be specified rather than referring only to 3-star ratings.

**2. Landscape**

The landscape design report submitted with the RTS is general in nature and does not provide an indicative plant schedule. As such, there is insufficient information provided to assess the species selection for mass planting and plant mixes within the development to confirm whether a viable landscape design with improved biodiversity values is achieved for the development.

The proposed internal planting on Level 0 is unclear as to whether planters or green walls are implemented. Whilst the design is based on biophilic principles, the use of green walls and internal planting must be designed for the conditions, which will be in partial to full shade, and limit the reliance on unsustainable LED growth lights for plant growth. The City discourages the use of synthetic green walls and planting that has no biophilic value. The use of planter boxes throughout the development are to be designed to provide adequate soil depth and volume for the provision of drainage and irrigation and comply with the Sydney Landscape Code.

The landscaping proposed within the pool deck and cabana zone include two trees *Cupaniosis anacardioides* (Tuckeroo) that are proposed to be relocated from the southern abutment landscape to the eastern edge of the pool courtyard. It is unclear why these trees have been relocated. Nevertheless, it is recommended that all planter boxes and planting on slab in the eastern courtyard be designed to provide adequate soil depth and volume for trees and palms, screening hedges, mass planting and turf. The use of artificial turf is not supported not only for its artificial plastic nature, but contribution to significant heat loads in summer months. Any turfing is to be designed using natural turf.

The submitted design report proposes extensive roof gardens on the Level 2 and 3 roof terraces using a native plant mix. However, these are misleading in that the plans and images provided are for perimeter planters with succulent species that are native to Mexico and South America. Whilst on trend and appropriate for a resort or hotel, the use of succulents in the landscape design is not considered sympathetic to the parklands and increasing biodiversity and habitat creation of the Moore Park and Centennial Park precinct.

The landscape design and plant schedule are to be amended to employ hardy native species with a preference for drought resistant species that contribute to habitat creation and biodiversity. Overall, the landscape package is to provide further detail to public domain material schedules and plant schedules as well as details for all planters, planting on slab, green roofs and internal planting.

### **3. Noise**

#### **a. Demolition and Construction Noise**

The updated Noise and Vibration Assessment Report, prepared by Arup, indicate additional works associated with the construction of the Stadium Fitness Facilities would marginally increase the predicted noise levels by 1dB at some receivers. Increases of 1dB are considered imperceptible to the average person and these noise levels have already been approved via previous consents.

The occurrence of the predicted noise levels would also be infrequent due to the low likelihood of the additional concrete pump truck and mobile crane operating concurrently with all other modelled construction equipment.

Due to the minor nature of cumulative increases to overall construction noise impacts, and the unlikely nature of cumulative impacts occurring, the increase in disturbance to the community due to the construction of the Stadium Fitness Facilities is considered low. Therefore, no additional noise mitigation is considered necessary due to the already approved construction noise levels.

Mobile cranes can reduce noise levels through shielding as they are considered a static plant. It is recommended that shielding be required for the additional plant to demonstrate that all reasonable and feasible noise mitigation measures have been implemented.

**b. Operational Noise**

Typical operational noise sources associated with Stadium Fitness Facilities include patron noise and music from the pool and outdoor café seating area and operational traffic generated by the Stadium Fitness Facilities. No additional external mechanical plant or equipment is required to operate the proposed facilities.

The noisiest periods of operation would be during functions held in the Stadium Fitness Facilities, which may occur on event days or non-event days. Noise emissions from internal activities are anticipated to be insignificant due to noise reduction through the building envelope.

Noise levels from patrons in the outdoor café, rooftop and pool area have been predicted for a total of 588 people in outdoor locations. All worst-case scenario noise predictions would comply with noise limits established for each receiver. The Stadium Fitness Facilities would meet the event and non-event noise limits, established at 10dB below noise limits for the main stadium. This demonstrates noise impacts resulted from the Stadium Fitness Facilities operation are predicted to be insignificant on event days.

To ensure the satisfactory operation and management of the Stadium Fitness Facilities, the various management plans required to be prepared under the existing consent and associated implementation and monitoring measures should be integrated to apply to the Stadium Fitness Facilities. This will mostly likely require rewording of relevant conditions to reference the Stadium Fitness Facilities, particularly where alcohol will be sold.

Further, conditions of consent should be imposed requiring the construction, fit out and finishes of the ancillary food premises to comply with Standard 3.2.3 of the Australian and New Zealand Food Standards Code under the *Food Act 2003* and AS 4674 – 2004 Design, Construction and Fit out of Food Premises. The hours of operation of the fitness facility as well as specific cumulative patron and music criteria should be stipulated for non-event days.

Should you wish to speak with a Council officer about the above, please contact Reinah Urqueza, Specialist Planner, on 9265 9333 or at [rurqueza@cityofsydney.nsw.gov.au](mailto:rurqueza@cityofsydney.nsw.gov.au)

Yours sincerely,



**Andrew Rees**  
Area Planning Manager