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Our Ref: R/2018/4/D  
Your Ref: SSD 9249 MOD 2

Karen Harragon  
Director - Social and other Infrastructure Assessments  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Attention: Aditi Coomar  
By email: [Aditi.Coomar@planning.nsw.gov.au](mailto:Aditi.Coomar@planning.nsw.gov.au)

Dear Aditi

**Exhibition of Modification Request for Sydney Football Stadium Redevelopment  
40-44 Drivers Avenue, Moore Park (SSD-9249-MOD-2)**

The City of Sydney (the City) has reviewed the information provided as part of the public exhibition to amend the scope of the Stage 1 demolition works to include the removal of the ground slabs of the existing buildings, removal of part of the existing piles of the former stadium and associated stormwater diversion drainage works. The City **objects** to the modification application based on the following concerns raised below.

**Noise**

The works proposed as part of the modification will be undertaken concurrently with works already approved under SSD 9249. This will include demolition of the slabs using the current excavators fitted with hammers and pulverisers. Demolished material will be taken from the site for recycling and disposal at a licenced waste facility. The size or times of these intrusive appliances to be used have not been adequately detailed in the submission.

The City previously raised concerns regarding the noise issues from the excavation and demolition works proposed in the Construction Noise and Vibration Management Plan (CNVMP). A satisfactory report was never received by the City and therefore the City could not support the application due to lack of information. AS2436-2010 - Guide to noise and vibration control on construction, demolition and maintenance sites was not fully considered and it is still unclear what actual noise mitigation measures are in place. The noise levels are predicted to be BG + 20dB at some noise sensitive receivers, the BG noise level (L<sub>90</sub>) for the area is approximately 55dBA therefore, the normal criteria set for such a site would be 65dBA in the City of Sydney Local government area. If noise levels from demolition are going to be that excessive the length of time of these works should be limited by respite periods or similar.

The City also raised concerns regarding the noise levels at the childcare centre, educational centres as these premises are seen as particularly noise sensitive receivers. It is unclear what noise mitigation has been approved for these developments or acceptable noise criteria.

The supplementary Acoustic statement prepared by ARUP dated 13 May 2019 states:-

***“The loudest anticipated activities to take place as part of the modification works, identified as hammering and excavating, have been previously assessed as part of the original Stage 1 works Noise and Vibration Impact Assessment (2018-06-05 - AC01-v5\_SFSR\_Noise and Vibration Impact Assessment, Arup, June 2018) and appropriate recommendations were provided in accordance with the Interim Construction Noise Guideline (DECC, 2009).”***

***No additional acoustic impacts due to the modification works are expected and therefore no mitigation measures additional to those proposed as part of the Stage 1 works acoustic assessment are considered necessary.”***

This is not a position that is supported by the City, as the noise for the Stage 1 concept development was not assessed to the City's satisfaction. The acoustic statement does not state the predicted noise levels of the additional works proposed, but it is understood that the approximate duration of the modification works at SFSR will be 11 months, which will be a significant impact on existing residents.

Dilapidation reports will need to be conducted prior to the works being approved/commenced due to possible vibration impacts from the works.

## **Stormwater**

The diversion of the existing Sydney Water stormwater main will involve connecting the new pipe to the existing pit and constructing a new main to the west of the proposed stadium. These works are required to ensure the demolition of buildings approved within SSD 9249 do not impact the existing stormwater servicing through the site. The existing stormwater drain through the site will be decommissioned and removed following installation and commissioning of the new drain.

Due to the size of the storm water installation and depth it is envisaged a 30T excavator will be based on site to do the excavation, bedding and installation of pipe. For pipe sizes 1050mm/1500mm the excavation strategy will require the use of heavy-duty shoring box for excavations deeper than 2.5m. Excavations less than 2.5m will be benched out in accordance with the relevant code of practices.

In addition to the above, a revised Construction Soil & Water Management Plan should be provided which includes information as to how water from the detention /settling ponds will be tested prior to discharge into the stormwater infrastructure in Driver Avenue to ensure that it meets applicable standards.

It is recommended a Dewatering Management Plan (DMP) be prepared to ensure that there are no contaminants prior to being released into the stormwater infrastructure. The DMP must clearly state that the water quality monitoring will be self-certified by an experienced water quality expert. Water is to be tested prior to discharge. There should also be a name and contact point for the site manager and water quality expert monitoring the discharge. The water quality expert monitoring the site is to sign and date water testing – stating that the water quality meets the above mentioned standards. If testing finds that it does not meet these standards discharge must be stopped immediately. The water quality expert is to clearly state in the final report that they believe all discharge met water quality standards.

## Contamination

Condition 24 of the SSD consent states:

***The Phase 2 Environmental Site Assessment report is to be reviewed by an EPA accredited Site Auditor to confirm the adequacy of the investigations to date, the required unexpected finds protocol, the proposed approach to managing or resolving potential contamination risks and/or to confirm the suitability of the proposed land use.***

A letter has been submitted from NSW EA accredited Site Auditor Jason Clay stating that the DESI reports submitted by Douglas Partners Pty Ltd concluded that:

***The site is considered suitable for its proposed continued use as a sporting stadium, provided that unexpected finds are managed appropriately during the construction phase of the project. The USTs present in the eastern portion of the site will need to be managed in accordance with the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008."***

The Auditor noted a number of deficiencies in the DESP report. However, concluded that 'adequate sampling locations have been investigated at the site to make up for the lack of information on some of the potential areas of concern/information on historical activities (including the petroleum infrastructure and the potential military past).'

- Drill - 77 boreholes
- Nine temporary groundwater monitoring wells

One (1) metre of topsoil is proposed to be imported to site to form the playing pitch and as such, the minor exceedances of recreational open space criteria noted in some samples collected in this area are not considered to be significant and will likely be removed during the construction of the new stadium.

The auditor considers that the reports have sufficiently characterised the potential contamination status of the site and that a remedial action plan does not need to be developed at this stage for the proposed development.

Asbestos was detected in only one of the 90 samples of filling analysed. This suggests that asbestos containing materials (ACM) may be encountered during site works, this should be dealt with via an Unexpected Finds Protocol.

The Site Auditor has not confirmed in his letter that the site is currently suitable for the ongoing use as a sports stadium as required under Condition 24 of SSD 9249. It is recommended that the Auditor's advice letter be amended to be incorporated to confirm this conclusion.

It is noted the consent does not require that a Section A Site Audit Statement be obtained from a Site Auditor confirming the site is suitable for the proposed land use. As this audit review is determined to be a statutory site audit the Auditor will however be required under the Contaminated Land Management Act 1997 to provide a Site Audit Statement confirming that the site is suitable for the land use.

## Transport

The supplementary Traffic Impact Statement prepared by ARUP estimates that 30-40 construction vehicle movements will be generated in a day by the proposed demolition activities. It is suggested that the large truck movements should avoid the network peak hour.

It is recommended the proponent prepare an updated Construction Traffic and Pedestrian Management Plan in consultation with the Council to ensure that any traffic/transport impact due to the demolition work in the City road network is managed appropriately.

## Heritage

An Addendum Archaeological Impact Statement prepared by Curio Projects in May 2019 has been submitted with the application. It is considered to adequately address the potential archaeological impacts of the proposal, the recommendations in Section 7 of the Addendum should be required to be complied with.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Jahn', with a stylized, flowing script.

**Graham Jahn AM**  
**Director**  
City Planning | Development | Transport