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Attention: Aditi Coomar
By email: Aditi.Coomar@planning.nsw.gov.au

Dear Aditi

SSD 9835 - Sydney Football Stadium (Stage 2 Design, Construction and Operation), 40-44 Driver Avenue, Moore Park

Thank you for your correspondence dated 17 June 2019, which invites The City of Sydney ("the City") Council to provide comments on the State Significant Development (SSD) for the detailed design and reconstruction of Sydney Football Stadium (SFS).

The City has reviewed the information provided as part of the public exhibition of the SSD and ***objects*** to the detailed proposal. The reasons for the objection are summarised as follows:

1. **The justification to redevelop the existing stadium has not been adequately demonstrated in the detailed application**. Specifically, the stated *"key improvements"* for the redevelopment relating to diversity and safety and security are not adequately demonstrated;

2. The City reiterates our concerns about the development as expressed in our objection to the Stage 1 concept proposal because **the detailed proposal has insufficiently addressed the cumulative impacts, traffic congestion and disruption to the surrounding community resulting from the development**. **The Stage 2 detailed proposal does not adequately address some matters outlined in the Secretary's Environmental Assessment Requirements (SEARs)**

3. Further, **insufficient information** has been provided of the Stage 2 detailed proposal to enable the City to carry out an informed assessment of the application.

1.0 Justification to redevelop Sydney Football Stadium

The City is not convinced that the nominated "*key improvements*" to justify the redevelopment of SFS have been exemplified in the Stage 2 detailed proposal. It is indicated that the issues with the former stadium are intended to be rectified as part of the proposed development by improving issues of diversity, safety and security, operational efficiencies, venue experience, the hirer experience and use and access of the stadium outside of events. However, the detailed proposal does not validate the redevelopment of SFS as follows:

1.1 Diversity

It is acknowledged that the former stadium did not comply with the Building Code of Australia (BCA) and the Disability Discrimination Act (DDA) and did not meet the standards for access with people with a disability. This reasoning was a catalyst of the redevelopment, driving the need to provide accessibility to a diverse range of people with different mobility, ages, backgrounds and gender.

The detailed proposal seeks to improve the accessibility of the site by designing the internal configurations of the stadium to the BCA in providing ample facilities and bathrooms, by generally providing adequate widths of travels throughout the stadium as well as the inclusion of prayer rooms. The notable improvement of accessibility is to the landscape and public domain in raising the concourse to create a continuous public concourse surrounding the stadium.

The City is committed to being an inclusive and accessible city for everyone, now and in the future. The City seeks to meet its legislative obligations under the *NSW Disability Inclusion Act 2014*, *Disability Discrimination Act 1992* and the *NSW Carers (Recognition) Act 2010*, and create a truly inclusive city by providing equitable opportunities for participation for people who live, work and visit the city. *The Inclusion (Disability) Action Plan 2017 - 2021* sets the framework and priorities to move beyond compliance with legislation towards a truly inclusive city. Further, The City has recently developed the *Draft Inclusive and Accessible Public Domain Policy and Guidelines* (the Guidelines) and provides a framework to apply relevant Australian access standards consistently. This includes best practice approaches in the design, maintenance and management of public domain spaces such as streets, footpaths, parks and open spaces, and infrastructure including street furniture.

In light of the above, ***the proposal unsatisfactorily addresses inclusion and accessibility*** as outlined below.

1.1.1 Moore Park Steps

To address the requirements of the Stage 1 concept proposal to provide public access from the south-west or Driver Avenue frontage, the subject application proposes a continuous raised concourse level surrounding the stadium, which results in flush connections into the site along Moore Park Road. Also as a result of the raised concourse, and to address the approximate 6m height difference in levels, access from Driver Avenue is only facilitated through stairs and 2 lifts.

The Landscape Plan and Statement, prepared by Aspect Studios, identifies the south-west corner of the site as one of the two primary entrances to the stadium as "open, legible connections to surrounding areas". It is identified as the key

pedestrian access point for the site, particularly given its location in leading patrons from public transport offerings of Central train station and existing bus and future light rail services on Anzac Parade. To this effect, it is imperative that the primary pedestrian route be an “open and legible connection” to the entrance of the stadium by providing a continuous accessible path of travel. The provision and reliance on 2 lifts adjacent to Driver Avenue for step free access is ***unacceptable and does not provide the optimal access outcome for a continuous accessible path of travel.*** This raises concern that the current design will require people with disability as well as elderly and families with prams to queue for lifts to access the precinct and stadium. Lifts are also prone to breaking down, and as such, equitable access cannot be guaranteed. They are not considered to have a comparable efficiency to a ramp. For the case of the development and anticipated patronage of the site particularly during events, 2 lifts are inadequate. Particularly during event days, this access will have issues relating to crowd management and would impact on the safety of spectators and visitors.

An alternative design that includes an access ramp or series of ramps into the Driver Avenue entry must be investigated to ensure that equitable access is provided for everyone. All wayfinding signage must clearly indicate the accessible path of travel and the presence of barriers such as stairs.

To support access from the Driver Avenue entry as well as to ascertain the safety of patrons, a level pedestrian crossing or signalised intersection is highly encouraged to be provided at the appropriate point to connect the path of travel from the public transport offerings to the Driver Avenue entry in order to ensure that pedestrian access is prioritised. The City also encourages that the pedestrian paths from Anzac Parade, including the Moore Park Light Rail Stops and from the Albert Cotter Bridge, through the south-west connection to the principal entry to the stadium be designed in accordance with the objectives and performance standards contained in *Section 1.2 – Tactile Ground Surface Indicators* and *Section 2.1 – The continuous accessible path of travel in parks* of the Guidelines.

1.1.2 Public Domain Materials

The proposal involves the use of brick pavements as a “front door” materiality feature at the key entries and gathering spaces. From an accessibility perspective, ***the small brick pavers on such a large scale can be problematic and can lead to uneven surfaces, which are uncomfortable for people with injuries and can be difficult for people with wheelchairs and limited mobility.*** An alternative paving material must be considered for the primary entrances, including larger format pavers with less opportunity for heaving. Areas can still be distinguished by colour contrast and use of textured borders to ensure that the intent for feature materiality is still achieved.

The proposal also provides integrated seating options in the public domain. To ascertain that people with disabilities can enjoy seating with equity that is safe, predictable and consistent, the seating should be designed in accordance with the performance standards outlined in *Part 1.4 – Stairs and ramps* of the Draft Guidelines in the following ways:

- Ensure that some integrated seating include back and arm rests to make seating more inclusive for the elderly;
- Provide regularly recessed areas in integrated seating to enable wheelchair users and families with prams to sit together;

- Where seating terraces and integrated chairs are provided:
    - Ensure Tactile Ground Surface Indicators (TGSI) are provided only at the top and bottom of the stair component to avoid people who are blind or have low vision confusing the seating terraces for stairs;
    - Instead of TGSIs at the top of seating terraces, consider the placement of planting or other elements to warn people who are blind or have low vision to travel another way.

1.1.3 Adult Change Facilities

The provision of adult change facilities is commended. However, the availability of this facility must be widely promoted to ensure that users with high support needs are privy to the facility through the following means:

- The National Public Toilet Map;
- A dedicated page about accessing the facility including access features available on the SFS website;
- Any access information provided to ticket agencies who may sell event tickets at SFS.

1.1.4 Stadium Seating

The submitted DDA Compliance Statement, prepared by Before Compliance, claims that the development will comply with the relevant standards, notably the number and grouping of wheelchair seating and companion seating required under the Disability Access to Premises Standard (2010) and that it will be distributed across all levels of the stadium. It is also noted that seating spaces would be sufficient to accommodate a large motorised wheelchair.

However, the documentation submitted with the application does not provide any details of information on the above. Accordingly, ***there is no certainty that the required seating for people with disabilities is provided for***.

Whilst the proposal generally addresses accessibility, the proposal, notably the access from Driver Avenue, is a ***poor outcome*** and does not provide a practical method for egress to and from the site. Evidently, the provision of 2 lifts is extremely inadequate, particularly during event days and it cannot accommodate the inevitable large crowds that would be travelling to the site from public transport. Therefore, ***the attempt to address diversity is unsatisfactory and consequently, does not warrant the extensive redevelopment of the site.***

1.2 Safety and Security

The detailed proposal seeks to address and improve the safety and security of the stadium by removing the perimeter fencing to allow for public access up to the stadium building line and through the site. The design, construction and operation of the stadium and public domain is also intended to minimise and mitigate potential threats.

The FIFA Stadium Safety and Security Regulations (the Regulations) and *FIFA Stadium Technical Recommendations and Requirements* has been referenced in the Environmental Impact Statement in guiding the design of the proposal and the standards for security, media and corporate facilities. Specifically in relation to safety and security, the Regulations provide guidance on the duties and responsibilities of organisers before, during and after matches in relation to safety and security at the

stadium. The basic principle for successful stadium safety and security achieves a balance between stadium design and stadium management. Particularly for stadium management, consideration to the staffing, safety and security planning, stadium risk assessments and policies, contingency and emergency plans, terrorism and record keeping of stadiums is fundamental to exercising good stadium management. It is noted that these Regulations are intended for FIFA events. However, it is appropriate to apply the Regulations to be implemented as a benchmark for use and operation of events held in stadiums in general.

Whilst the detailed proposal has been architecturally designed to generally improve the stadium configuration as well as the public domain through the provision of a continuous concourse, the ***poor access provided on Driver Avenue and the design of the public domain in this regard would inhibit safety and does not allow for the smooth and efficient circulation of thousands of people*** in the event of a threat. Further, ***the proposal inadequately demonstrates the measures to implement and carry out safety and security management of the stadium***.

The Regulations provide guidance on the need to have a specialised team that facilitates the safety and security of the stadium by creating policies, creating and testing contingency plans, major incident plans and emergency plans and devise procedures for accommodating all spectators.

The submitted 'Event Management Strategy', prepared by the Sydney Cricket and Sports Ground Trust, outlines that the Trust will develop a Security Management Plan for all security policies and procedures relating to event and non-event days and would be specifically tailored for SFS operations. The Strategy provides limited details on event day security such as security check points being carried out to the curtilage of the stadium and contingent on the scale of the event with separate access for the general public and staff, media and officials. The Strategy also details that the Trust enforces terms and conditions of entry that would continue to be displayed at all entry points to the event in addition to the event promotor's terms and conditions. Finally, the Trust outlines that they operate an extensive CCTV system that is controlled by full time security guards.

Additionally, the 'Security and Risk Assessment Statement', prepared by Intelligent Risk, makes reference to a Security and Risk Assessment Strategy Report, which includes a Security Risk Assessment, Security Strategy and Hostile Vehicle Mitigation Strategy. Whilst the sensitivity of the information is acknowledged, the details are not publically available. The methods of implementing safety and security for the site is lacking and does not completely address FIFA's requirements of recognising the significance of staffing and creating and testing contingency and emergency plans.

Safety, security, emergency response and evacuation principles should not be considered in isolation to the detailed proposal as it may affect the design of the stadium and public domain. This should be considered concurrently with the design and development of the application and not at a later stage. Therefore, it would be reasonable to suggest that ***given the application has not demonstrated that satisfactory safety and security management plan is in place, the design of the stadium as proposed may not be suitable and acceptable.***

Summary

The application emphasises the redevelopment of SFS is necessary to ensure that the stadium maintains its classification as a Tier 1 Stadium, which is outlined in the 'NSW Stadia Strategy 2012' as offering a *"seating capacity greater than 40,000; regularly host international sporting events; offer extensive corporate facilities, including corporate suites, open-air corporate boxes, and other function/dining facilities; may be the home ground for sporting teams playing in national competitions"*.

It is noted that the design of the stadium has been developed in consideration of the operational requirements of a Tier 1 stadium, and therefore improve the operational efficiencies of the former stadium. This includes providing a wide, 360 degree internal and external concourse to provide efficient circulation of the site and stadium and allow for substantial food and drink offerings. The proposal seeks to achieve this by separating back of house functions to patron areas and be contained within the basement in new storage and maintenance areas.

Further, it is noted that the shortcomings of venue experience of the former stadium was related to viewing quality and lack of weather protection. The proposed stadium provides 100% coverage to all seats to the dripline and clear sightlines to the pitch, video screens and other spectator zones to enhance the event day experience and atmosphere. Similarly, the former stadium provided limited facilities for hirers. The proposal seeks to enhance the hirer experience through the provision of additional and improved change rooms, coaches and media areas.

It is recognised that the detailed proposal addresses the technical and operational shortcomings of the former stadium, particularly as a sporting venue. However, irrespective of the above, the proposal has not been designed appropriately to address diversity to allow for optimal access and egress from the primary pedestrian entry of the site. Also, there are inadequate safety and security management measures to ascertain that a venue that can host up to 55,000 people has the ability to respond to emergencies and threats.

These factors are fundamental to the operation of the future stadium and in their absence, the justification for stadium renewal has not been met. In summary, the "key improvements" that were provided as justification for the project are not demonstrated and must be addressed.

2.0 Outstanding issues of the Stage 1 concept proposal and inconsistencies with the Secretary's Environmental Assessment Requirements

Whilst the proposal is consistent with the maximum building envelope approved in the Stage 1 concept proposal, the City raises significant concern that the Stage 2 detailed proposal fails to address the issues expressed in our objection to the Stage 1 proposal that are critical to any development of this scale. Primarily, these concerns relate to built form and urban design, transport and access in demonstrating sustainable transport planning, lack of consideration to environmental sustainability as well as tree removal and landscaping. These concerns are reiterated in the following sections.

2.1 Risk of neighbourhood disturbance from increased concerts and major entertainment events is not acknowledged

The City emphasises the concern raised in our Stage 1 objection that the proposal does not provide substantiated evidence that the primary operation of the SFS is principally for a sports stadium. The established evidence of low attendances for most sporting matches compared to the stadium capacity implies the increased risk of concerts and major entertainment events that are not covered in the Environmental Impact Statement (EIS). This would expand on the primary use of the venue as a sports stadium to accommodate broader uses and generate return on investment. The increased events would have significant cumulative impacts, particularly relating to traffic and parking.

As stated in our Stage 1 objection and according to the EIS, "*the existing stadium currently limits itself to six (6) concerts/entertainment events per annum, which will not change. There will also be no change to the existing time limits for sporting, concert and other events"*.

There is well-established evidence of low attendance numbers for most sporting matches at the stadium (excluding grand finals and one-off matches). Some estimates put the average attendance levels at just 40% or 17,000 of the maximum 42,000 capacity.

According to the INSW Business Case summary, the assumed total annual attendance increase, with the 6 event restriction continuing, is in the order of 250,000 to 300,000 patrons. Based on the recent trends and a changing media landscape, the estimated patronage for sporting fixtures are overly optimistic. Continuing low patronage (in the face of potential ticket price increases) for sporting matches heightens the risk that a revised program of major entertainment events will be necessary to prop up the business case. This risk and development potential is omitted from the EIS and therefore cannot be assessed.

2.2 Built Form and Urban Design

2.2.1 Stadium design

The detailed proposal provides a 'bowl' roof form and seeks to reference the 'saddle' design of the former stadium roof by heightening the roof form above the eastern and western stands to sweep down to the reduced heights of the northern and southern stands. This design response results in increased heights to the eastern and western sections as well as the depth of the development when compared with the former stadium.

Whilst it is acknowledged that the proposed built form is reduced when compared to the approved Stage 1 envelope, the bulk and scale is larger than the envelope of the former stadium and is excessive to the context of the Paddington Heritage Conservation Area.

Particularly, when viewed from Moore Park Road, Cook Road and Stewart Street, the proposed stadium 'bowl' is explicitly prominent and dominates the skyline. The unnecessary bulk is at odds with the prevailing fine grain character and detrimentally impacts on the visual and heritage quality of the area. This is emphasised by the significant tree removal already granted under the Stage 1 concept approval, which

would typically provide natural screening to reduce any bulk and scale impacts of the development.

While the City is broadly supportive of photovoltaic solar panels, the solar panels proposed to be located on the north-western section of the roof of the stadium, are visible from the Paddington Heritage Conservation Area. The Visual Impact Statement, prepared by SJB, provides photomontages of the development and shows that the location of the solar panels have a significant visual impact. Overall, ***the excessive roof form, together with the poorly located photovoltaic solar panels contribute to the unnecessary bulk and scale of the development.*** A greater effort should be made to relocate the solar panels and reduce the roof form of the development to be consistent with the scale of the former stadium, so as to be sympathetic to the fine grain, heritage character of the surrounding area.

2.2.2 Public domain connection between Moore Park Road to Driver Avenue

The new public domain connection on the west side of the stadium, linking Moore Park Road to Driver Avenue, has a contorted, sub-optimal alignment, with poor sight lines and a major change in level to the monumental stair on Driver Avenue. This problem is largely caused by the intrusion of the existing, low-quality Rugby League building (other such buildings are being demolished as part of the project). This building blocks site lines, creates a pinch point in the external concourse with a major change in level and awkward interface. The placement of the lifts, geometry of the stair and incidental pockets of landscape further compromise this area as public space, creating unfortunate dead end spaces.

This problem brought about by the site plan, could be better resolved by either moving the stadium slightly to the east or by removing the eastern end of the NRL Building (this sort of adaptation has been carried out frequently in inner Sydney when streets have been widened or created). The objective should be to make a generous, barrier -free and unambiguous public connection on the western side of the stadium - the current proposal is considered to not be an optimum design outcome.

2.3 Transport and Access

It is acknowledged that the site is located within close proximity to existing and future public transport modes including the new light rail, bus services and Central and Kings Cross train stations.

Notwithstanding this, the City reiterates that the detailed proposal fails to adequately address appropriate measures for reducing private car usage, management of mass transit, vehicular and pedestrian movement as well as safety, walking and servicing.

2.3.1 On-site car parking numbers

The proposal seeks to retain the existing car parking spaces and reconfigure the MP1 car park to accommodate approximately 600 car parking spaces that would be reserved for members and VIPs only on event days.

It is noted that Condition No. 39 of the Stage 1 consent mandates that the Stage 2 proposal must maintain the number of car spaces currently available at the MP1 car park and maintain the same access point. However, the City is very concerned that there is no commitment to reduce on-site car parking numbers for the stadium redevelopment, and therefore, the proposal does not demonstrate sustainable transport planning.

The '*Transport Assessment for Stage 2 Development Application'*, prepared by Arup, does not set a clear vision to genuinely reduce private car mode to access the stadium. The use of grass top/informal parking spaces during event days is not supported. The report admits to convert temporary parking structures into permanent structures. This is deemed unsustainable.

Whilst the grass top parking is not part of the stand-alone stadium redevelopment, the reliance on these huge car parking spaces and their future modal split ***does not demonstrate the NSW government's commitment to permanently reduce car parking and encourage sustainable transport planning.***

Overall, the abundance of permanent and formalised parking will encourage people to drive on and outside of event days and will increase the mode of private vehicles to the site. As a result, soft measures such as the Green Travel Plan and Transport Access Guide will not work if the parking supply is not constrained.

2.3.2 Green Travel Plan

In light of the above, the submitted Green Travel Plan (GTP), prepared by Arup, does not meet the City's requirements as prescribed in Schedule 7 of Sydney Development Control Plan (DCP) 2012.

The proposed GTP reiterates the status quo in terms of access, unreasonably retains the intrusive parking across areas of Moore Park, and anticipates that the current capacity of the event buses will be transferred to the new Light Rail. Parking for the stadium, if required, should be wholly located on the SFS land. The GTP assumes that the capacity of the Light Rail will be available for event crowds when it is more likely that it will already be carrying significant crowds (especially on weekday evening peaks) with very limited capacity to move event crowds to Central or elsewhere.

The GTP also does not adequately cover Uber and limousine drop off and pick up, which is likely to be an increasing problem given the expected increase in use associated with corporate seating. There is an existing problem in South Paddington, reported by residents that limousines illegally park throughout the area during game time to be able to pick up after the game. Such waiting/parking if it is to occur needs to be accommodated on site rather than being a nuisance to adjoining residents.

The GTP should set a clear time-bound target for reducing private car travel to and from the stadium and should document the measures to

achieve the target. A GTP Coordinator must be appointed to implement and monitor the travel plan. The GTP will have a monitoring and evaluation mechanism to update the plan from time to time so that it is a "living document". The report should regularly be published to the public and the annual performance report be sent to Council for assessment and evaluation in 5 years. The GTP should also include a wayfinding plan to the bicycle parking and end of trip facilities and should have a plan to widely circulate the Transport Access Guide (TAG) to the public. The aim of the TAG is to ensure people know how to get to the site by walking, cycling or public transport as well as by car.

The TAG should be incorporated in the GTP and this component is lacking in the detailed proposal. The proposal does not meet the requirements of Sydney DCP 2012 and it is highly recommended that a revised GTP be developed in consultation with relevant stakeholders and the City.

2.3.3 Access and traffic generation

The Stage 2 traffic report has updated the SIDRA software modelling to include the 'worst case' double header events when the SFS and Sydney Cricket Ground (SCG) are both in use. The results confirm that three out of the five intersections that were tested will have a Category C Level of Service rating. ARUP's traffic reports recommends that the double header counts of 95,000 people is an "extremely unlikely scenario" and the modelling results show no intersection will be performing less than a Level of Service Category C. The RMS Traffic Generating Development Guidelines outlines that a Category C provides a satisfactory Level of Service for intersections, however, most drivers are restricted to some extent of their freedom to select their desired speed and to manoeuvre within the traffic stream. The general level of comfort and convenience noticeably declines at this level.

As outlined above, ***general traffic congestion will worsen if a reduction of on-site car parking is not prioritised and made explicit.*** The frequency of events is proposed to increase. This indicates that traffic congestion would become more frequent and in conjunction with the potential permanent installations to the temporary car parking spaces, traffic congestion would worsen and significantly impact on the local road network during and outside of event days.

2.3.4 Walking

The Stage 2 Traffic Report includes a Pedestrian Route Assessment to identify all pedestrian routes between nearby public transport nodes and the site. The analysis indicates that, even under a worst-case double header scenario of 95,000 patrons, footpaths in the precinct have the capacity to accommodate crowd movements with a reasonable pedestrian level of service.
During events, the cycleway along the Moore Park Road boundary would be used for pedestrians. Whilst The City does not object to this, it is expected that people would take an alternative route during events.

The Traffic Report has stated that a new 6m wide pathway will be provided within Moore Park as part of the Sydney Light Rail project to connect Driver Avenue with the new Moore Park light rail stop. The City

is concerned that the post-light rail plans for footpaths on Devonshire Street have not been designed to accommodate for stadium crowds. ARUP's report states that currently, the highest volumes of pedestrians are seen along Foveaux Street and Fitzroy Street, which is perceived by most people to be the quickest and most direct route. The pedestrian route capacity assessment states that the double header demand and capacity of 0.71 pedestrians per metre per minute were found for Foveaux Street. This is an acceptable pedestrian level of service. However, as previously raised in the Stage 1 objection, the traffic report has not considered the review of signalised intersections on the Foveaux Street walking route.

2.3.5 Road safety

The submitted traffic report states that the detailed proposal provides increased plaza areas around the Moore Park Road entry point to improve pedestrian safety by creating additional pedestrian waiting areas within the site boundary. The introduction of formal taxi-ranks and the enhancement of the walking route via Devonshire Street and its status as the preferred walking route between Central and Moore Park is supported as it will contribute to road and pedestrian safety.

To this effect, efficient wayfinding is paramount and it is recommended that a real-time digital display could better serve the purpose and would help to reduce unnecessary traveling to find a parking spot.

2.3.6 Taxi rank on Moore Park Road and Lang Road

Taxi ranks are proposed on Moore Park Road, which is a Council road (Council Controlled Regional Classified Road). As such, any change to the kerb side parking controls will require approval from the Traffic Committee.

2.3.7 Bicycle facilities

The Stage 2 Traffic Report suggests that a total of 150 bicycles have been provided within the public domain. 45 racks for 90 bikes are located along Moore Park Road to service the north-west as well as 30 racks for 60 bikes are provided along the eastern stadium entries.

In consideration of the projected 1,000 full time jobs for SFS alone and 45,000 spectators, the proposed bicycle spaces are insufficient. Whilst the City's expectation is of a higher percentage of approximately 10% of bicycle users, the proposal provides bicycle parking counts for less than 0.2% of the proposed stadium capacity.

Moreover, the bicycle plan as illustrated in the landscape and public domain plans, demonstrates that the bicycle racks within the public domain are not weather protected and are not secured. These racks are ideal for visitors and spectator use. However, this does not comply with the staff/employee bicycle parking requirements of Sydney DCP 2012. Additionally, no lockers, showers and bathrooms have not been provided as part of the end of journey facilities of the stadium.

The City expects that quality bicycle and end of journey facilities are to be provided to this complex. The layout, design and security of bicycle and end of journey facilities must comply with the minimum requirements of Australian Standard AS 2890.3:2015 Parking Facilities Part 3: Bicycle Parking Facilities and Sydney DCP 2012.

Specifically for the development, at least Class B (AS 2890.3:2015) bicycle parking and associated end of journey facilities should be provided for 1% of the total fulltime staff with an option to provide additional facilities for future demand. Also, Council's new design guide requires **a minimum of 3.5m wide shared path** to be provided adjacent to a bus stop/shelter.

2.4 Environmental Sustainability

The City reiterates that the concern detailed in our objection to the Stage 1 concept proposal and the requirement under the SEARs has not been addressed in ***that the proposal does not demonstrate ecologically sustainable development (ESD).***

The Stage 2 detailed proposal does not provide details on the existing energy and water use. As such, it is difficult to compare the redevelopment of the stadium and whether it has an improved or worse total impact to that existing. This unwillingness to compare the 'new' with the 'old' in terms of energy use, potable water use and operational waste generation demonstrates a lack of transparency and leadership in exercising best practice environmental performance.

Further, the proposal utilises the LEED rating scheme, which is a US scheme. The energy modelling and compliance pathway methodology of the LEED scheme is weaker than the Infrastructure Sustainability Council of Australia (ISCA)'s sustainable infrastructure tool or Green Star Design. Therefore, the LEED rating tool is not appropriate for the Australian context and the Australian sustainability rating tools should be utilised.

The development proposes a rainwater tank to utilise rainwater harvested from the stadium roof for irrigation with the size and location to be confirmed. This provides the City with no indication of the proportionality of use of recycled water in place of mains water. There is no indicative provided on the potable water savings made over time. The use of captured water is insufficient and details are lacking in relation to the proposed bore water irrigation of the site.

An indication of the proportionality of the annual on-site renewable energy generated from photovoltaics compared to the energy imported from the main grid electrical supply is required to determine the energy consumption of the development and whether it is aligned with the NSW Government's 'Net Zero Emissions by 2050' carbon abatement ambition.

2.5 Tree Removal

The '*Arboricultural Impact Assessment and Tree Specification'*, prepared by TreeiQ has been reviewed and it is indicated that a total of 7 trees are proposed to be removed to facilitate the development.

The documentation submitted with the application indicate that 'Tree B', which is a mature street tree, is proposed to be removed for the widening of the Moore Park Road site entry and exit. However, the submitted plans illustrate that that there are

no new driveways proposed in this area and that the tree removal is to accommodate pedestrian access from Moore Park Road.

Accordingly, ***the proposed removal of Tree B is not supported and it is recommended that the tree be retained and protected with other street trees surrounding the site.***

2.6 Replacement Tree Planting

The legacy of a tree-lined boulevard on Moore Park Road and Driver Avenue has been diminished and significantly impacted by the removal of 28 trees to facilitate the construction. At the Stage 1 concept proposal, the applicant made a commitment for compensatory tree planting. The SEARs also required the provision of a detailed landscape and public domain plan showing the existing (pre-Stage 1 works) and proposed services and reinstatement works to the MP1 Carpark including replacement tree planting.

There were no plans submitted with the detailed proposal relating to the replacement of tree planting. Compensatory advanced tree planting for trees removed during the Stage 1 works should be integral to the Stage 2 works. Details of trees to be replaced as well as species and size of trees must be provided.

3.0 Insufficient Information

Inadequate information was provided with the application to determine the cumulative impacts of the detailed proposal. As such, the following recommendations are suggested.

3.1 Operational Noise Assessment

The redesign of the shape of the stadium from a ‘saddle’ to a ‘bowl’ shape, which has higher tiered seating stands and facades to the north and south would reduce environmental noise emission to the surrounding area.

However, as a venue designated under Clause 90 of the Protection of the Environment Operations (General) Regulation 2009, the stadium is required to have a Noise Management Plan in place. The submitted ‘Sydney Football Stadium Redevelopment – Draft Noise Management Plan’, prepared by Arup, attempts to outline the definition of non-compliance of noise limits for events. Also, the Draft Plan is unclear about what constitutes a breach of the project approval conditions with the number of consecutive exceedances and number of separate occasions.

Accordingly, the Noise Management Plan must be finalised prior to determination and must include details that constitute a breach in the noise conditions. The final Plan must also be reviewed on an annual basis.

3.2 Construction Noise and Vibration

It is anticipated that construction would commence in November 2019 and would take approximately 3 years to complete with the proposed construction works to be carried out in accordance with the following works program:

Activity	Duration
Earthworks	6 months
Piling	7 months
Concrete Structure (stadium bowl)	18 months
Roof Construction	18 months
Internal Façade and Fitout	18 months
Façade	12 months
External Works	6 months

The construction and traffic noise should not be directly compared as they have different noise profiles. Therefore, a detailed Construction Noise and Vibration Management Plan must be prepared prior to identify the noise associated with the construction and the appropriate measures to mitigate any impacts.

3.3 Noise Policy for Industry – Criteria

Mechanical plant noise was not assessed as part of this application and is subject to further design development during the detailed design stage. This is not acceptable for a Stage 2 development and the general design and sound power level should be known at this stage.

Cooling towers and acoustic louvres are proposed to be installed with the assumption that the Noise Policy for Industry (2017) amenity and intrusiveness criteria would be met. However, The City is concerned that this cannot be guaranteed until the type of equipment to be installed has been selected.

3.4 Land Contamination

In consideration with the Detailed Environmental Site Investigation (DESI) report and Site Auditor letter submitted with the subject application as well as with Modification 2 – Removal of ground slabs and existing piles (SSD-9249-Mod-2), the site auditor has not confirmed that the site is currently suitable for the ongoing use as a sports stadium as required under Condition No. C24 of the Stage 1 concept development consent.

The site 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 of the development. At no point in the letter does the EPA accredited site auditor state that the site is fit for the proposed use. Therefore, it is recommended that clarification sought from the site auditor on the contamination of the site and protocol for unexpected findings prior to determination of the Stage 2 detailed proposal.

3.5 Lighting

The public domain lighting for the development has not been adequately considered. Whilst a statement was provided confirming that the development complies with the relevant requirements of Obtrusive Lighting under Australian Standards AS4282, there were no calculations and specifications provided that demonstrate compliance.

The stadium and carpark lighting should be sighted and installed to effectively control unwanted effects such as glare on surrounding properties. As such, The City recommends that a condition covering the statutory nuisances from the stadium be imposed.

3.6 Landscape

There are inconsistencies with the submitted landscape package and the architectural plans submitted with the application. Specifically, there is conflicting information relating to the details of the Driver Avenue entrance with respect to the number of lifts and the path of travel from the MP1 car park. Additionally, there are discrepancies with the number and extent of flights of stairs at the Driver Avenue entrance to determine if the flight dimensions are acceptable.

Further, there is a lack of consideration made to the impacts of new paving and infrastructure to the roots and health of existing trees. Particularly, the concrete pavement proposed over the tree roots of significant trees are within the structural root zone and would have a significant impact on the health of these trees.

Inadequate details were provided relating to soil depths, volume, drainage and irrigation of the proposed landscaping elements and trees proposed throughout the development. The landscape proposal fails to demonstrate the feasibility and maintenance of landscaping and longevity.

3.7 Heritage

The Heritage Interpretation Strategy that was submitted with the Stage 2 application should be further developed by the applicant's heritage consultant in consultation with relevant stakeholders and the City. The final Strategy is to be prepared during the Stage 2 construction as part of the detailed design work and implemented prior to occupation of the stadium.

3.8 Public art

The propose public art submission, that forms part of the Public Domain Plan, does not provide adequate details for a public art strategy that the City would typically require to be considered as part of a Preliminary Public Art Plan.

The submission omits the proposed method for procuring artists, whether invited or open to expressions of interest. Importantly, it also lacks an indication of how artist's concepts would be integrated into the highly developed design of the public domain or the construction phases of the development.

While the art strategy does refer to the potential to reflect on the Indigenous and archaeological heritage of the site, the strategy does not indicate how it will be achieved. For instance, the proposal does not specify how to invite Aboriginal artists to respond to the history of the site or creatively demonstrate how Sydney's water supply relied heavily on water from the site.

3.9 Waste

The waste service collections and waste storage arrangements must be conducted in accordance with The City's Waste Policy – Local Approvals Policy for Managing Waste in Public Spaces (2017).

It is recommended that recyclable material is not to be compacted and consideration should be made to have Return and Earn supplied bins for recyclables that meet the criteria for container deposit schemes. This will increase the opportunities for collecting and recycling a clean stream with minimal contamination. If no Return and

Earn bins are provided, consideration should be made to the use of a glass crusher to manage glass containers.

No waste is to be presented or stored on the footpath at any time during construction. Commercial tenancies must have a commercial waste contract in place prior to the commencement of the business trading and consideration should be made to the installation of temporary public waste bins during major events to limit litter in the neighbouring residential areas.

Should you wish to speak with a Council officer about the above, please contact Reinah Urqueza, Specialist Planner, on 9288 5882 or at rurqueza@cityofsydney.nsw.gov.au.

Yours sincerely,

Graham Jahn AM
Director
City Planning I Development I Transport