



Contact Officer: Emese Wolf – 9093 6824

Our Ref: D03601280

19 July 2019

Ms Aditi Coomar
NSW Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2000

Dear Ms Coomar,

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

Thank you for the opportunity to make a submission on the above State Significant Development (SSD) Application. It is noted that the SSD relates to the redevelopment of the Sydney Football Stadium (Stage 2 design, construction and operation).

Council's position in opposing the demolition of the Sydney Football Stadium is a matter of public record. Copies of Council's resolutions have been included for your reference.

Notwithstanding the above, Council offers the following comments on the Stage Two (Design, Construction and Operation) SSD Application for the Sydney Football Stadium.

Heritage

The Heritage Impact Statement for the proposed Stage Two Sydney Football Stadium Redevelopment site includes detailed recommendations in relation to the interpretive approach to the Historical Archaeology, Busby's Bore, and Aboriginal Cultural heritage archaeology. These recommendations should be included in any determination of the Stage Two Development Application.

In addition, the following specific consent condition is recommended:

- A Final Interpretation Plan for the development site is to be prepared to guide interpretation of the history of the site including Aboriginal archaeology, Historical Archaeology, built and landscape heritage and Aboriginal Cultural heritage. The Interpretation Plan is to be based on the Heritage Interpretation Strategy prepared by Curio Projects and is to include interpretive media, locations for interpretive devices, text, images and design details. The Interpretation Plan is to be submitted and approved prior to an occupation certificate being issued for the development. The Interpretation Plan is to be implemented in conjunction with the infrastructure works including the construction of the stadium and surrounding open space zones. The local Aboriginal community should be consulted on the content and context of the Interpretation Plan.

It is noted that the Heritage Impact Statement recommends (page 64) that, as an interpretive strategy, the proposed LED projection surfaces on the Stadium's external wall be used as a medium for sharing heritage storylines. Clarification will be needed in the Final Interpretation Plan (which is to be prepared during construction of the Stadium) as to how this medium will be used for interpretative purposes in conjunction with other promotional uses related to non-heritage commercial events/branding and themes in a way that respects the interpretive content and storylines.

Landscaping and Public Domain

The Landscape and Public Domain Strategy provides a comprehensive response to the conditions of the Stage 1 development consent. Council offers the following specific comments in regards to the Landscape and Public Domain Strategy:

- Council is supportive of the proposed robust and sustainable public domain materials.
- Pedestrian, user amenity and seating must consider the amenity for persons with physical challenges and cultural diversity.
- Consideration of counter terrorism mitigation measures should be incorporated in the stadium circulation and public domain design.
- Access appears to only consider issues of gradient. Consideration must be given for persons with other disabilities such as poor vision and hearing.
- Council supports the tree retention/replacement ratio as a minimum for the loss of trees as a consequence of stadium development.

Traffic and Transport

Council notes in the proposal's traffic/transport analysis that the development will have no proposed increase in attendees and the number of events, and that a new public transport mode will be in operation by the time of completion. It is considered that the following recommendations should be included any determination of the SSD application to further enhance the transport provisions of this proposal:

- Additional 'on-ground' bike parking is to be provided for staff close to where the 'wall-mounted' bike parking is proposed. Some persons find that manoeuvring a bicycle in to wall mounted racks is very challenging. This applies particularly to persons who may not be so tall or so strong. Access to bike parking should be available to people of all capabilities.
- Transport for NSW must be mandated to accept Integrated Transport Ticketing for EVERY event held at the SFS and the SCG – so as to reduce the likelihood of private vehicles being driven to the venue/s. This is for the benefit of the local communities and for the greater good of the wider Sydney area.
- Specific share bike and share e-scooter parking corrals must be created in the environs of the SFS and the SCG to support those who ride from, say, Redfern, Green Square, Central or Bondi Junction transport nodes. Having such corrals also provides surety for 'return trip users'.
- Strong consideration is to be given to a simple access, drop-off / pick up, parking bay dedicated to future self-driving vehicles. This is required as self-driving cars are most likely (especially initially) to require predetermined simple pickup and drop-off points, so the car can always pull over safely and legally. This parking bay could, perhaps, be located behind the proposed coach parking area on Moore Park Road.

Acoustic Amenity

The acoustic report provided by ARUP (dated 31 May 2019) addresses noise and provides recommendations to ensure compliance with relevant noise criteria. Noise validation is proposed post operation up front, which assess the noise impacts and emissions from the proposed sports stadium facility in accordance with the relevant guidelines and established noise limits. Noise validation is recommended to occur during rehearsal stage of all future concerts to ensure noise limits are complied with.

Council notes that the Noise Management Plan for future operations has been provided as a part of the application. This document must evolve post operation stage based on the amenity impacts and any future required amendments must be complied with.

Proposed future concert numbers should be aligned with established number measures to ensure compliance with the relevant conditions of approval.

Noise validation is recommended post operation and prior to all future concerts to ensure established noise limits are complied with.

Contamination

SEPP 55 requires all planning authorities to consider contamination and whether the site is suitable for the intended use.

A Site Auditor from Senversa has reviewed contamination reports provided by Douglas and Partners and has provided recommended measures in section 5.2 of letter dated 12 June 2019. These recommendations should be fully complied with. Based on advice from Douglas and Partners the site has been considered as being suitable for the intended use provided recommendations detailed in contamination reports are incorporated in relevant plans during construction works.

Ecologically Sustainable Development (ESD) and Resilience to Climate Change

The Environmental Impact Statement (EIS) states that a key driver in the detailed design, construction and operation of the stadium is the achievement of best practice ESD targets to minimise the consumption of resources and guide sustainable operation in the future.

In this regard, the ESD report indicates that this has not been achieved to date as the Leadership in Energy and Environmental Design (LEED) Gold rating target identified in the report is not confirmed at this stage. Being a new stadium in a major city, Council recommends consideration of a Platinum rating under LEED.

A minimum LEED Gold standard and its required ESD points should be confirmed prior to consent being granted.

Renewable Energy

The proposed development proposes photovoltaic cells to be applied to areas of the roof that will enable the stadium to capture just enough energy to support day-time operations. A zone indicating the location that photovoltaic cells can be best integrated with the stadium roof is indicated on the plans. It should be noted, however, that no commitment is made to the final capacity and location of these photovoltaic cells within the application.

The ESD Strategy indicates that the proposed photovoltaic system only meets a third of the LEED Renewable Energy Production (EA123) score points available for this credit. Given the size of the roof, the photovoltaic system should be sized to offset day-time and night-time operations.

Water Sensitive Urban Design (WSUD)

To utilise rainwater harvested from the stadium for irrigation the proposed development proposes a rainwater tank. However, as stated within the ESD strategy, the size and location of the rainwater tank will be confirmed during the detailed design stage. Details such as these should be included within this application. The limited WSUD response to rainwater harvesting and reuse is considered an inadequate response for a new development of this scale and significance. Given this, the following WSUD measures should be further investigated:

- The proposal should provide an increase in permeable surfaces especially in respect to the reinstatement of the existing paved areas and the proposed Moore Park Carpark 1 providing 540 at grade car parking spaces.
- Groundwater recharge through stormwater infiltration systems such as swales and raingardens should also be included to offset the impacts of the proposed development and improve the aesthetics of the sports stadium facility.
- Installation of additional landscaped areas to offset impacts of the facility such as green walls and roofs should also be incorporated into the design.
- there are principles to manage flooding as outlined in the Executive Summary of the Stormwater Management Plan. The before and after flood maps show only very localised changes to flood depth and hazard in the very close immediate proximity to the stadium itself. No downstream impacts are evident.

If you would like to discuss any of these matters further, please contact Emese Wolf, Strategic Planner on 02 9093 6824.

Yours faithfully,



Alan Bright
Manager Strategic Planning