

Modification application for SSD 8175 being the Stage 2 Design and Construction of Western Sydney Stadium (Bankwest Stadium)

Response to Submissions Report



Prepared for Venues NSW

December 2019



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ABBREVIATIONS

BOMP	Biodiversity Operational Management Plan
DPIE	NSW Department of Planning, Industry and Environment
EMP	Event Management Plan
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
FRNSW	Fire and Rescue
FoH	Front of House
OEH	Office of Environment and Heritage
OMP	Operational Management Plan
ONMP	Operational Noise Management Plan
CoPC	City of Parramatta Council
RMS	Roads and Maritime Services
TPMP	Traffic and Pedestrian Management Plan
TfNSW	Transport for NSW
RtS	Response to Submissions Report
SEE	Statement of Environmental Effects
VLive	VenuesLive
VNSW	Venues NSW

EXECUTIVE SUMMARY

Venues NSW (VNSW) is seeking approval to modify its existing consent (SSD 8175) for the Stage 2 Design and Construction of Western Sydney Stadium (Bankwest Stadium) (Stadium) under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979 (NSW)* (EP&A Act).

This Response to Submissions (RtS) Report has been prepared to respond to submissions received by the Department of Planning, Industry and Environment (DPIE) during the exhibition of the modification application (the Application) and statement of environmental effects (SEE).

The Application and SEE were prepared to modify the approval to:

- temporarily increase the number of major sporting events permitted at the Stadium each year from 49 to 80 until such time as the NSW Government's Stadium Redevelopment Program is complete;
- permanently increase the number of major sporting events permitted at the Stadium each year from 49 to 65 following the completion of the stadium redevelopment program;
- permanently increase the number of concert events permitted each year from 3 to 5;
- permanently increase the usable function space on the western side of the Stadium;
- increase the allowable patron numbers in the useable function spaces at any one time from 700 to 2514 on non-event days; and
- increase function operational hours from 7:00 am to midnight on non-event days.

The modification aims to ensure that NSW remains competitive in the national and international sporting and event market both during, and after the NSW Government's Stadium Redevelopment Program is complete. It also aims to enable the full utilisation of existing function space within the Stadium on no event days.

DPIE publicly exhibited the SEE for a period of 14 days between 16 October and 30 October 2019 and called for responses from any interested parties. Submissions were received from a total of eight government authorities and one from a member of the public. None objected to the Application.

Concert Noise

Both the EPA and DPIE raised concern regarding potential noise impacts associated with additional concerts in the absence of monitoring data from one or more concert events. In response, and as outlined in this report VNSW has agreed to revisit the management and regulation of noise generated at the Stadium by amending and adopting in its Operational Noise Management Plan (ONMP) a best practice, real time noise monitoring system prior to any increase in concert numbers.

The system would effectively transfer compliance points from external sensitive receivers to points within the Stadium (including Front of House). The system is considered by regulators as a more contemporary approach to managing concert noise. The new compliance points within the Stadium would be used to reactively manage noise levels instantaneously for the duration of the event.

VNSW will work with the DPIE and its own acoustic engineers to review and update the ONMP. It will utilise monitoring data obtained from the first two scheduled concerts being Cold Chisel (24 January 2020) and Elton John (7 March 2020) to inform the new noise management regime. VNSW expects that any approval of the Application would include a condition requiring the update of the ONMP for the approval of the Planning Secretary prior to holding the 4th concert event at the Stadium.

To ensure major events including concerts held at the Stadium achieve optimal acoustic outcomes, VNSW also seeks approval to undertake sound testing the day prior to any major event, including concerts. This will not introduce new impacts as sound checks are allowed regardless, and any sound checks would still need to comply with the existing time limitations stipulated in the approval. Sound tests conducted the day before an event however would provide flexibility and ensure sufficient time to adjust and calibrate the sound system to account for the nature and type of major sporting and concert event. Consequently, VNSW seeks approval to:

- permanently allow for sound testing the day prior to any major event subject to the existing times already stipulated in the approval.

Traffic & Pedestrian Management

In addition, Transport for NSW (TfNSW) raised concern that the modification proposal would likely require an increase in the number of times that O'Connell Street would need to be closed, which would further impact on the road network (general traffic and bus operations). In combination with the Parramatta Light Rail TfNSW was concerned that this will impact the surrounding road network and sought the preparation of a new Traffic Management Plan. However, following further discussion with TfNSW, it was agreed that reviewing and updating the existing Traffic and Pedestrian Management Plan was more appropriate. This will avoid duplication of effort and confusion on applicable management plans.

Structure of Report

The following Response to Submissions report is structured as follows:

- 1 – Introduction: the preceding overview of the modification proposal, any changes since exhibition, the relevant statutory approval pathway, and structure of the RtS;
- 2 – Exhibition and Consultation: provides a description of the consultation which was not only undertaken as part of the SEE, but is ongoing;
- 3 – Overview of Submissions: provides an analysis of the submissions received during the exhibition of the SEE and identifies the key issues raised;
- 4 – Response to Government Submissions: provides a list of submissions received from Government Authorities and their responses;
- 5 – Updated Operational Management Plans: Lists the operational management plans that will need to be updated and how; and
- 6 – Conclusion: provides a summary and conclusion to the RtS.

1 INTRODUCTION

Venues NSW (VNSW) is seeking approval to modify its existing consent (SSD 8175) for the Stage 2 Design and Construction of Western Sydney Stadium (Bankwest Stadium) (Stadium) under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979 (NSW)* (EP&A Act).

The modification application (Application) and Statement of Environmental Effects (SEE) were prepared consistent with relevant regulatory requirements by CW Strategic Planning Services in conjunction with VNSW.

The Application and SEE were exhibited from the 16 October 2019 to the 30 October 2019 during which 8 submissions were received from Government authorities and 1 submission from the general public.

The submissions received, and the issues raised therein form the subject of this report, titled the Response to Submissions (RtS) Report.

1.1 Proposal overview

VNSW seeks a modification to its existing approval to:

- temporarily increase the number of major sporting events permitted at the Stadium each year from 49 to 80 NSW Government's Stadium Redevelopment Program is complete;
- permanently increase the number of major sporting events permitted at the Stadium each year from 49 to 65 following the completion of the stadium redevelopment program; and
- permanently increase the number of concert events permitted each year from 3 to 5.
- permanently increase the usable function space on the western side of the Stadium;
- increase the allowable patron numbers in the useable function space from 700 to 2514 on non-event days; and
- increase function operational hours from 7:00 am to 12 midnight on non-event days

The modification aims to ensure that NSW remains competitive in the national and international sporting and event market both during, and after the stadium network redevelopment program is finished. It also aims to enable the full utilisation of existing function space within the Stadium on non-event days.

Noise management at Bankwest Stadium

As demonstrated in the SEE, the increase in frequency of sporting events and concert events and increased patronage and use of function space within the Stadium on non-event days is not predicted to result in unacceptable environmental, amenity or land use safety impacts.

While no fundamental concerns were raised in submissions regarding the proposals to increase the frequency of sporting events or the increased use of function space on non-events days, both the NSW Environment Protection Authority (EPA) and NSW Department of Planning, Industry and Environment (DPIE) raised concern regarding the uncertainty surrounding potential noise impacts associated with any increase in the frequency of concerts.

This is particularly relevant given no concerts have been held at the Stadium to date and no monitoring data has been obtained. It is noted that Cold Chisel and Elton John are scheduled to hold 1 concert each in January and March 2020 respectively.

To address these concerns prior to any increase in the number of concerts held each year at the Stadium, VNSW has agreed to revisit the management and regulation of noise generated at the Stadium by amending and adopting in its ONMP a best practice, real time noise monitoring system. The new system would effectively transfer compliance points from external receivers (sensitive receivers) to compliance points within the Stadium including FoH. These compliance points would then be used to reactively manage noise levels instantaneously for the duration of the event.

It is understood that the proposed new noise management system has been used successfully by Brisbane City Council at Riverstage, an outdoor music venue in Brisbane which holds approximately 24 large music events per year. It is located in a not too dissimilar setting as the Stadium. A similar system was introduced at the Sydney Opera House in 2016 and the NSW Government is currently considering establishing a similar approach for the Sydney Football Stadium (SFS) once constructed and operational.

VNSW commits to working with DPIE and its own engineers in amending the ONMP. The approach would apply to all major events held at the Stadium. VNSW anticipates that any approval would include a condition requiring the ONMP to be updated for the approval of the Planning Secretary prior to the 4th concert event at the Stadium. Further detail regarding the adoption of the proposed new noise management system is provided in **Section 3.3**.

To ensure major events and concerts held at the Stadium achieve optimal acoustic outcomes, VNSW also seeks approval, where necessary, to undertake sound testing the day prior to the event. This would not introduce new impacts given sound tests can currently be conducted provided they are carried out within certain timeframes. This will not change. However, the ability to conduct sound tests the day before a major event would provide flexibility and more time to adjust and calibrate the sound system to account for the nature and type of major event including concerts. Further detail regarding this proposed amendment is provided in **Section 3.3**. In addition to the matters listed at the top of this section, VNSW would also like to seek approval to:

- permanently allow for sound testing the day prior to any major event subject to the existing times already stipulated in the approval.

Bankwest Stadium – bolstering the local economy

Since finalising and submitting the SEE, economic analysis undertaken on behalf of the City of Parramatta Council (CoPC) has found that the Stadium is making a significant contribution to the Parramatta economy.

The analysis which was based on a survey of more than 600 people who attended one of three sporting events at the Stadium, found that over the three events, visitors spent an estimated \$1.27 million inside the Stadium and an estimated \$1.65 million in the Parramatta Local Government Area (LGA).

It also found that 88 per cent of visitors said their visit to the Stadium positively influenced their perception of Parramatta; 96 per cent highly rated their experience of the Stadium; and 95 per cent highly rated their overall experience of the Parramatta LGA.

1.2 Purpose of this report

The purpose of this RtS is to respond to issues raised within submissions received during the exhibition of the Application and SEE. The RtS has also been prepared in response to a request from the Secretary of the DPIE to respond to the issues raised including those raised by the DPIE in its consideration of the SEE. Each of the submissions received has been collated, analysed and addressed as relevant.

This RtS supplements the SEE as exhibited and should be read in conjunction with the SEE.

1.3 Statutory approval process

The Application and SEE have been prepared in accordance with section 4.55(2) of the EP&A Act. The SEE, as supplemented by the RtS demonstrates that the key operational implications of the modified development being noise, biodiversity, and traffic and transport would remain largely unchanged.

Section 4.55 also requires the Minister for Planning to be satisfied that the proposed modification is consistent with the approved project and does not constitute a new project in its own right. As detailed in the SEE, VNSW submits that the development, as modified, would be substantially the same development as that originally approved in that:

- it retains the same building envelope and building height for the stadium and the future development;
- it retains the same uses, stadium capacity, car parking spaces, identified uses, vehicular and pedestrian access points, design guidelines and public domain; and
- the environmental impacts of the modified development are similar to those of the approved development.

1.4 Structure of this report

As noted in the Executive Summary, the structure of this RtS is as follows:

- 1 – Introduction: the preceding overview of the modification proposal, any changes since exhibition, the relevant statutory approval pathway, and structure of the RtS;
- 2 – Exhibition and Consultation: provides a description of the consultation which was not only undertaken as part of the SEE, but is ongoing;
- 3 – Overview of Submissions: provides an analysis of the submissions received during the exhibition of the SEE and identifies the key issues raised;
- 4 – Response to Government Submissions: provides a list of submissions received from Government Authorities and their responses;
- 5 – Updated Operational Management Plans: Lists the operational management plans that will need to be updated and how; and
- 6 – Conclusion: provides a summary and conclusion to the RtS.

2 EXHIBITION AND CONSULTATION

The EA was placed on public exhibition between 16 October 2019 to 30 October 2019 consistent with the provisions of the EPA Regulations which govern modification applications. Hard copies of the EA were made available for public review at CoPC and Parramatta Library.

The EA was also made available to the public in electronic format on the DPIE website during this time. All documentation remains on the DPIE's Major Project Register in electronic format.

2.1 Consultation

VNSW continues to consult with government authorities, relevant sporting organisations, non-government organisations, the wider community and affected neighbours regarding the ongoing operation of the Stadium. This includes but is not limited to:

- CoPC
- DPIE
- Transport Management Centre
- NSW Police Force
- Parramatta Park Trust
- Parramatta Leagues Club
- National Rugby League
- Australian Rugby Union
- NSW Rugby Union
- Mercy College
- Community Consultative Committee

Feedback from all relevant parties informed the preparation of the Application, SEE and RtS and continues to inform the ongoing operation of the Stadium.

2.2 Next steps

Following acceptance of the RtS, the DPIE will finalise its assessment of the modification application. The Minister for Planning has delegated the authority to determine Section 4.55 modification requests to the DPIE where there are less than 25 submissions by way of objection, and CoPC has not objected. Under these circumstances it is understood that the Application can be determined under delegation by the DPIE.

3 OVERVIEW OF SUBMISSIONS

Nine government and public submissions were received during the statutory exhibition period. An overview of the consolidated submissions and a summary of the process undertaken to ensure that the submissions have been accurately summarised and appropriately addressed is provided below.

3.1 Submissions received

Submissions were received from a total of 8 government authorities as follows:

- CoPC
- EPA
- Office of Environment and Heritage (Environment, Energy and Science Group)
- TfNSW (including RMS)
- Heritage Office
- NSW Health
- Fire and Rescue (FRNSW)

The DPIE also raised a number of issues to be addressed in preparing the RtS. The DPIE's issues letter has been treated as a submission in the RtS.

One submission was received from a member of the public.

3.2 Submission response methodology

Where relevant, government submissions have been made available to those technical experts that informed the preparation of the SEE. The information relating to the relevant responses has been referenced and addressed below or the tables in **Section 4**.

However, it is noted that:

- CoPC stated in its submission that *"Upon review of the provided documents Council raises no concerns with these changes subject to the additional events and uses complying with the existing management plans"*.
- FRNSW stated in its submission that *"FRNSW offer no comments or recommendations in regard to the submitted modification given that the proposed changes have no impact on the fire and life safety aspects of the development"*.
- Environment, Energy and Science Group (formerly part of the Office of Environment and Heritage) stated in its submission that *"EES has reviewed the response prepared by 'AMBS ecology and heritage' dated September 2019 and has formed the view that the proposed modification is unlikely to increase the impacts on biodiversity values"*.
- NSW Health stated in its submission that *"the WSLHD Centre for Population Health has no comments on the proposal. You may receive a separate submission from the WSLHD Office of the CE"*. To date, no separate submission has been received from the WSLHD Office of the CE.

Under these circumstances the submissions from CoPC, FRNSW, the Environment, Energy and Science Group, and NSW Health are not considered further in this RtS.

Public submission

It is also noted that the public submission received stated that *“Greater utilisation of the new stadium at Parramatta is a great idea. I support this proposal”*. Consequently, the submission is not considered further in this RtS.

Key Issues raised in submissions

3.3 Contemporary noise management at the Stadium

Both DPIE and EPA raised concern about any increase in the number of concerts prior to monitoring one or more concert events.

DPIE stated, *“that it is insufficient to base the conclusions on the noise generated by concerts upon modelling only. As additional concerts are being requested, and no concert has been held at the Western Sydney Stadium to date, additional detail on the noise monitoring and management procedures that will be implemented for concerts is requested. This should include consideration of an alternative and contemporary method of assessment and management of noise from concerts”*.

The EPA stated, *“that a live music event has not yet been held and monitored at the site. The noise levels from such an event may yet exceed the noise levels at the adjacent receiver locations. The EPA advises that this may be a risk in approving the changes to the development consent as per the current proposal prior to a music event being monitored on site. Additional information is required to support this proposal (see heading 2 below). Should the impact of live music events be deemed a significant impact on the community following the first live music event at the venue, the EPA advises that it will be critical to manage the expectations of the community and have management measures in place to manage potential impacts should the additional two performances per year be approved”*.

While no concert events have been held at the Stadium to date, there have been 31 major sporting events held during which full compliance with noise goals was achieved, and no noise related complaints received. VNSW has approval to conduct 3 concerts per year at the Stadium based on the veracity of the modelling undertaken in support of the original approval. VNSW submits that this modelling and the safeguards built into the ONMP would be sufficient to manage concert noise from the 2 additional concerts and ensure residential amenity is maintained.

Despite this and to address the concerns surrounding the lack of monitoring data and the need for a more responsive approach to noise management (as outlined in **Section 1.2**), VNSW has agreed to establish a more contemporary approach to noise monitoring and regulation at the Stadium by adopting a best practice, real time noise monitoring system with compliance points located within the Stadium as opposed to outside the Stadium at sensitive receivers.

3.3.1 How the real time noise monitoring system would work at Bankwest Stadium.

The system would effectively transfer compliance points from external sensitive receivers to points within the Stadium. The new compliance points would be used to reactively manage noise levels instantaneously for the duration of the event. The monitoring may include, but not be limited to, a web-based real time monitoring system with permanent compliance points within the Stadium, potentially on stadium roof mounted noise monitors and monitors at FoH. Initially, the use of these as compliance points would be confirmed using external monitoring to ensure noise goals are continuously met at sensitive receivers.

Key features of this system include:

- The centralised logging of noise levels data which is a more accurate method for assigning noise to the concert event.
- The monitoring system would continuously monitor and log noise levels at the event site.
- The monitoring system is focused on proactively preventing perimeter sound pressure level exceedance.
- Exceedance of the compliance point noise limits would be identified early and immediate action to reduce levels could be implemented.
- When notified of a complaint, sound control can immediately check if noise is compliant and operators could go to the complaint site. This allows more accurate and immediate response to the complainant.

The workings of the new system would be detailed in a fully redrafted ONMP. VNSW anticipates that any approval of the Application would include a condition requiring the ONMP to be updated for the approval of the Planning Secretary prior to the 4th concert event being held at the Stadium.

VNSW recommends that changes to either or both of the conditions below could be made to effectively ensure the implementation of the new noise management system through an updated ONMP.

Condition D7 requires

j) A program for review of the ONMP, including ongoing assessment and improvement of the ONMP.

Condition D9 requires

The ONMP (as revised from time to time) must be implemented by the Applicant for the life of the project.

VNSW will work with the DPIE and its own acoustic engineers to review and update the ONMP. It will utilise monitoring data obtained from both Cold Chisel and Elton John concerts scheduled for January and March 2020 respectively to inform the new noise management regime.

3.4 Sound testing the day prior to a major event including concert event

VNSW also seeks approval to undertake sound testing the day prior to major events, in particular concerts events. The current approval does not permit sound testing the day before a major event, including concerts. Condition A4 c) as relevant reads as follows:

Event operational hours:

- i) *concerts – 12 pm to 10:30pm*
- ii) *amplified sound tests or rehearsals – 10 am to 7 pm, on the same day to the planned event; and*
- iii) *amplified sound tests or rehearsals undertaken on a school day – 3:30 pm to 7 pm, on the same day to the planned event.*

There are some major events such as concerts, rugby union and rugby league test matches and 7s competitions where event sound testing may be necessary the day before the planned event to ensure sufficient time to make appropriate technical modifications or corrections to the sound system. It is unlikely to be required for club matches and other similar events.

VNSW submits that provided the sound tests are conducted within the times frames already stipulated in the approval, no new noise related impacts would occur, particularly given that sound tests are allowed for all major events and events can be held on any day of the week. Sound tests the day before a concert event would provide flexibility and provide more time to adjust and calibrate the sound system to account for the nature and type of event, in particular concerts. This is particularly the case for artists which produce different sound profiles.

Consequently, VNSW seeks to amend condition A4 c) as follows:

- i) *concerts – 12 pm to 10:30pm*
- ii) *amplified sound tests or rehearsals on the same day as the planned event or the day immediately prior to the planned event*
- iii) *amplified sound tests or rehearsals undertaken in accordance with A4 c) ii) can only be undertaken between 10 am to 7 pm on a non- school day or 3:30 pm to 7 pm on a school day.*

3.5 Specific timeframe for the temporary increase in sporting events.

The need for the temporary increase in major sporting events is due to the scheduling of the NSW Government Stadia Redevelopment program. While the program was developed to meet certain sporting events deadlines, the specific timeline for the temporary increase in major sporting events cannot be stated as there are too many outside factors such as demolition program, construction program and inclement weather which may adversely affect the timelines. The current timeline for the stadia redevelopment is provided below.

The SFS demolition works began in Q4 2018 and were complete in Q4 2019. The construction works are scheduled to commence in Q1 2020 and it is expected to take approximately two years with the new stadium scheduled to open in Q2 2022

Stadium Australia (SA) is scheduled to be decommissioned in Q2 2020. The redevelopment of SA is expected to take approximately 3 years which will have the SA operational in Q2 2023

This program of stadium network redevelopment means that the Stadium will be the only one available within the stadium network for approximately two (2) years between Q2 2020 and Q2 2022. In Q2 2023 it is expected that all three stadiums will be in operations and the program of redevelopment complete.

3.6 Specific justification for the numbers

Major Sporting Events

The successful opening of the Stadium has attracted interest from patrons, promoters, sporting codes and clubs. The increase from 49 to 80 sporting events as identified in Table 1 below, will allow VNSW to relocate event content to the Stadium during the redevelopment timeline.

There has been much interest from sporting codes (i.e. Rugby Australia and National Rugby League) to host major sporting events at the Stadium during the shutdown of SFS and SA. Further to this, the Waratahs Super Rugby Franchise has relocated events to the Stadium during the redevelopment of SFS and National Rugby League Clubs such as South Sydney Rabbitohs and Canterbury Bulldogs will be relocating events to the Stadium during the redevelopment of SA. The numbers identified in Table 1 below are maximums and represent an upper limit number of sporting events. The increase in the frequency of sporting events will not only enable the Stadium to host more regular season events but also allow for any unscheduled sporting events such as Trials 'Friendlies' and Finals Series events to be held at the Stadium.

Concerts

Given the Stadium will be the only one available within the stadium network for approximately two (2) years, Concert Promoters will be left with only one real option to host major music events. These major music events typically have demand for multiple event days.

By increasing the number of concert type of events from three (3) to five (5) this will allow for at least two Concert Promoters to stage multiple event days for their artists.

Post the redevelopment period VNSW will actively seek to attract more events at the Stadium to ensure that it provides the optimum return on investment to the NSW Government. It is envisaged that some of the additional events that were procured during the redevelopment period will become part of the annual event calendar post the stadium redevelopment program completion.

Table 1 – Bankwest Stadium – 2020-2023 Event Calendar (Maximum Indicative Sporting Events)

Bankwest Stadium - 2020 - 2023 Event Calendar - Maximum Sporting Events				
	Year	Year	Year	Year
	Ended	Ended	Ended	Ended
	31-Dec-20	31-Dec-21	31-Dec-22	31-Dec-23
Sporting Events				
Parramatta Eels	11	11	11	11
Wests Tigers	4	8	8	8
Bulldogs	5	10	10	4
Rabbitohs	5	10	10	4
Dragons	-	-	-	-
Sharks	-	-	-	-
Manly	-	-	-	-
Penrith	-	-	-	-
NRL Finals	3	3	3	3
World Nines	-	-	-	-
International Rugby League	1	1	1	1
Wanderers - A-League	14	13	14	13
Wanderers - A-League Finals	2	2	2	2
Wanderers - Asian Champions League	-	5	5	5
Wanderers - FFA Cup	2	2	2	2
Socceroos/Matildas	2	2	2	2
Football Exhibition matches (e.g. WSW v Leeds)	-	1	-	1
Wallabies	1	1	1	1
Waratahs - Super Rugby	4	4	3	1
Waratahs - Finals	1	1	1	
Sydney Sevens	2	2	2	-
Total Sporting Events	57	76	75	58
Concert Events	5	5	5	5
	5	5	5	5
Total Events	62	81	80	63
Others to be Confirmed				
Code Trial matches				
Marquee Friendlies and Exhibition Games				
W-League events				
etc.				

**Disclaimer: Table 1 Contains Indicative Number of Sporting Events for each year.*

4 RESPONSE TO GOVERNMENT SUBMISSIONS

Responses have been provided to the submissions received from the following government authorities:

- EPA
- TfNSW (including Road and Maritime Services (RMS))

The DPIE also requested that VNSW address a number of issues. These have been addressed in the RtS.

4.1 NSW Environment Protection Authority

The issues raised in the EPA's submission to the proposal as exhibited are outlined and addressed in **Table 4.2** below.

Table 4.1 – Response to issues raised by the EPA

Aspect	Issue	Response
Noise Management	<ul style="list-style-type: none">• Impacts of additional events based on monitoring undertaken to date.• Additional information required to evaluate the proposal for additional music events.	<p>The adoption of FoH noise limits as opposed to limits at sensitive receivers will ensure an appropriate balance between patron enjoyment and residential amenity.</p> <p>Refer to Sections 1.3 and 3.3.</p>

4.2 TfNSW

The issues raised in TfNSW's submission to the proposal as exhibited are outlined and addressed in **Table 4.3** following.

Table 4.2 – Response to issues raised by TfNSW

Aspect	Issue	Response
The closure of Church Street as part of the Parramatta Light Rail (PLR) project in 2020 likely to impact O'Connell Street.	<ul style="list-style-type: none">• The proposal would likely require an increase in the number of times that O'Connell Street would need to be closed, which would further impact on the road network (general traffic and bus operations). This and in combination with the PLR works, will impact the surrounding road network.• It is requested that the	<p>VNSW commits to updating its Traffic and Pedestrian Plan in consultation with the Sydney Coordination Office within TfNSW and RMS to accommodate the construction of the PLR and potential impacts on O'Connell Street before, during and after events at Bankwest. The approach is support by TfNSW. Refer to Appendix B.</p> <p>VNSW submits that drafting a new draft Traffic and Transport Management Plan represents a duplication of effort and</p>

	<p>applicant prepares a draft Traffic and Transport Management plan in consultation with the Sydney Coordination Office within Transport for NSW and Roads and Maritime as part of the applicant's Response to Submissions. This draft Management Plan needs to identify issues associated with the increased number of events and propose measures (such as scheduling bump-out outside the transport peak periods) to minimise the impact on the traffic and transport operation on the road network located adjacent to the Stadium.</p>	<p>may result in confusion regarding which plan is applicable. This is supported by TfNSW which stated in correspondence dated 21 November 2019 (refer to Appendix B) that,</p> <p><i>"it supports an amendment to the existing Traffic and Pedestrian Management Plan as opposed to the preparation of a new one relative to the construction of the PLR. - There should be no change to the current O'Connell St road closure plan for the stadium. Although there will need to be a review of traffic flow, VMS management, and the event Rideshare Geo-fence when both O'Connell St is closed for Stadium event bump-out and Church St is closed for Light rail/pedestrian areas".</i></p>
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4.3 Department of Planning, Industry and Environment

The issues raised in DPIE's response to the proposal as exhibited are outlined and addressed in **Table 4.3** below.

Table 4.3 – Response to issues raised by DPIE

Aspect	Issue	Response
Existing Operations	<ol style="list-style-type: none"> 1. The number of major sporting events held to date, the type of event and the number of patrons in attendance. 2. The number of functions held to date and the number of patrons in attendance. 3. Traffic and patron movement data from any 'back-to-back' events held to date. 	<ol style="list-style-type: none"> 1. Refer to Appendix A. 2. There have been 83 functions with 11,997 people attending those functions. 3. Refer to Appendix B.
Operations in relation to the stadia network	<ol style="list-style-type: none"> 1. A specific timeframe for the temporary increase in major sporting events. 2. Specific justification on the numbers of both the temporary and permanent major sporting events and concerts requested, taking into consideration the number of events held at both 	<ol style="list-style-type: none"> 1. Refer to Section 3.4 2. Refer to Section 3.5 and Table 1 3. Refer to Section 3.5 and Table 1

	<p>Stadium Australia and Sydney Football Stadium. Further detail in relation to the modifications requested</p> <p>3. Further consideration and justification in relation to the number of concerts requested noting that it is stated most artists perform two concerts and the number of concerts requested is five.</p>	
Noise management during concerts	<p>It is insufficient to base the conclusions on the noise generated by concerts upon modelling only. As additional concerts are being requested, and no concert has been held at the Western Sydney Stadium to date, additional detail on the noise monitoring and management procedures that will be implemented for concerts is requested. This should include consideration of an alternative and contemporary method of assessment and management of noise from concerts.</p>	Refer to Sections 1.2 and 3.3 .
Operational Management Plans	<p>Specific detail on how the Operational Management Plan and Operational Noise Management Plan will be updated to address any potential temporary or permanent increase in major sporting events or concerts.</p>	Refer to Section 5 which lists the operational management plans that will need to be updated and how.

5 UPDATED OPERATIONAL MANAGEMENT PLANS

5.1 Operational Management Plan (Condition D1)

VNSW and VenuesLive have reviewed the OMP and commit to making the following changes:

- Amend references in D1 b to reflect the approval as amended (pp 5-6) specifically the increase in functions space, patrons and operating times; and
- Amend references in D1 g. to reflect the need to update the Traffic and Pedestrian Management Plan (pp 8-11) to accommodate the construction of the PLR and implications for Stadium patrons in particular the closure of O'Connell Street;

The Landscape and Vegetation Management Plan, Service Area and Loading Dock Management Plan, and the Memorandum of Understanding executed with CoPC, which are appended to the OMP, have also been reviewed and don't warrant amendment.

5.2 Event Management Plan (Condition D4)

VNSW and VenuesLive (VLive) have reviewed the EMP and commit to making the following changes:

- Amend D4 b to reflected updated number and type of events and activities per year including projected attendances.
- Amend reference to current number of approved events
- Amend D4 c to reflect the need to ensure mitigation measures are adequate to accommodate access during the construction of Parramatta Light Rail.
- D4 g relates to the Traffic and Pedestrian Management Plan. Reference to the Plan will need to be updated to reflect the need to accommodate the construction of the PLR noting that the Plan already acknowledges the need for changes to accommodate the operation of the PLR including amended pedestrian routes where applicable. Amendments to the Plan itself are addressed in 5.4 below.

The Emergency Response and Evacuation Plan, Flood Emergency Response Plan, Parking Management Strategy, Service Area and Loading Dock Management Plan have also been reviewed and don't warrant amendment.

5.3 Operational Noise Management Plan

The ONMP as agreed in **Sections 1.2** and **3.3** will fundamentally be rewritten to establish the new noise management regime. In particular and as follows:

- Section 2 will need to be amended to reflect an amended indicative annual events schedule as modified.
- Section 3.1 will need to be updated to reflect the management regime and what monitoring may be undertaken at sensitive residential noise receivers and at the Grey-Headed Flying Fox camp noting that FoH noise management should do away with the need for regular external monitoring.
- Section 4 will need to be fundamentally rewritten, to establish the new FoH regime in particular how the FoH works in terms of event monitoring, monitoring locations, monitoring requirements; monitoring procedures and consideration of results.
- Section 5 will need to be revised to identify and establish FoH noise goals that will ensure compliance at sensitive receivers whilst at the same time ensuring patron satisfaction.
- Section 6 which includes results of modelling should be revised to include the monitoring results obtained from the first concerts held in January and March respectively.
- Sections 7, 8 and 9 will all need to be revisited to establish new procedures consistent with the new noise management approach.

5.4 Traffic and Pedestrian Management Plan

The Traffic and Pedestrian Management Plan (TPMP) will need to be revised. As identified in the TPMP, it is only applicable for the period between the first event at the Stadium and the

commencement of Parramatta Light Rail works on Church Street. The Plan highlights that future revisions will be required for:

- the Parramatta Light Rail construction phase; and
- the operational phase of the Parramatta Light Rail.

Most notable, and as identified by TfNSW in its submission, any revision of the TPMP to account for the construction of the PLR will need to revisit traffic flow, VMS management, and the event Rideshare Geo-fence specifically when both O'Connell Street is closed for Stadium event bump-out and Church Street is closed for light rail/pedestrian areas.

5.5 Biodiversity Operational Management Plan

VNSW and VLive have reviewed the EMP and commit to updating the noise management section of the Biodiversity Operational Management Plan (BOMP) (**Section 4.1.2**) to reflect new noise management approach particularly as it relates to:

- noise monitoring during sporting events and concerts;
- monitoring surveys;
- access to monitoring data by relevant biodiversity contractors engaged to monitor the Grey-headed Flying-fox roost; and
- and any additional potential corrective actions required.

6 CONCLUSION

VNSW seeks approval to modify its approval for the Stadium to:

- temporarily increase the number of major sporting events permitted at the Stadium each year from 49 to 80 until such time as the NSW Government's Stadium Redevelopment Program is complete;
- permanently increase the number of major sporting events permitted at the Stadium each year from 49 to 65 following the completion of the stadium redevelopment program;
- permanently increase the number of concert events permitted each year from 3 to 5;
- permanently increase the usable function space on the western side of the Stadium;
- increase the allowable patron numbers in those useable function spaces from 700 to 2514 on non-event days; and
- increase function operational hours from 7:00 am to midnight on non-event days.

The modification, which aims to ensure that NSW remains competitive in the national and international sporting and event market, was publicly exhibited between 16 October 2019 and 30 October 2019. 8 submissions were received from Government authorities and 1 submission from the general public. No submission objected to the proposal.

The key issue to arise from the exhibition was the uncertainty associated with increased concert frequency without the benefit of monitoring data. Consequently, and prior to any increase in concert frequency, VNSW will establish through a revised ONMP approved by the Planning Secretary a more contemporary noise management regime based on compliance with noise goals at FoH instead of at the sensitive receivers. This allows:

- for a more accurate method for assigning noise to the concert event;
- compliance with the FoH limits during a concert event to ensure noise levels at receivers are acceptable; and
- allows for continuous real-time monitoring of FoH noise levels by a sound engineer.

All other issues raised in submissions or by DPIE have been addressed. Management plans have been reviewed and both the ONMP and the TPMP will require substantial revision, the ONMP prior to any increase in the frequency of concerts, and the TPMP prior to the construction of the PLR commencing. The proposed modifications to the approved development are in the public interest as the proposed changes will enable:

- Sydney to accommodate major sporting events whilst the SFS and SA are being redeveloped.
- Continued benefits for the local and regional economies associated with the holding of events at the Stadium.
- The increased use of the Stadium without a commensurate increase in environmental and amenity related impacts.
- The efficient use of the Stadium for non-event day functions.
- Increased return on public infrastructure expenditure.

Given the above, approval of the modification is warranted.

Appendix A – 2019 events to date

The table below details the number of major sporting events held to date, the type of event and attendance numbers.

2019 Events

Day	Date	Event	Attendance	Code
Sunday	14/04/2019	Community Open Day and Official Opening	30,000	Community
Wednesday	17/04/2019	Wednesday Night Lights - Open Training Session	7,000	Community
Monday	22/04/2019	Eels v Tigers	29,047	NRL
Saturday	27/04/2019	Waratahs v Sharks	10,605	Rugby
Saturday	4/05/2019	SG Ball Cup NSWRL Junior Grand Final	2,600	NSWRL
Sunday	5/05/2019	Eels v Dragons	25,872	NRL
Thursday	23/05/2019	Eels v Panthers	16,228	NRL
Saturday	25/05/2019	Waratahs v Jaguares	13,885	Rugby
Friday	31/05/2019	Eels v Rabbitohs	23,198	NRL
Friday	7/06/2019	Tigers v Raiders	12,585	NRL
Saturday	8/06/2019	Waratahs v Brumbies	12,016	Rugby
Saturday	15/06/2019	Eels v Broncos	16,854	NRL
Thursday	27/06/2019	Tigers v Rabbitohs	9,807	NRL
Friday	5/07/2019	Tigers v Roosters	13,918	NRL
Sunday	14/07/2019	Tigers v Eels	24,125	NRL
Saturday	20/07/2019	WSW v Leeds	24,419	FFA
Saturday	27/07/2019	Eels v Warriors	17,392	NRL
Saturday	3/08/2019	Bulldogs v Panthers	10,062	NRL
Saturday	10/08/2019	Eels v Knights	20,671	NRL
Thursday	22/08/2019	Eels v Bulldogs	18,071	NRL
Saturday	24/08/2019	Shute Shield Grand Final	9,247	Rugby
Saturday	31/08/2019	National Premier League Grand Final	6,426	Football
Friday	6/09/2019	Eels v Sea Eagles	25,034	NRL
Saturday	7/09/2019	Wallabies v Samoa	13,788	Rugby
Sunday	15/09/2019	NRL Finals W1 - Eels v Broncos	29,372	NRL
Sunday	29/09/2019	NSWRL Grand Finals	4,891	NSWRL
Saturday	12/10/2019	WSW v Mariners	14,027	A-League
Friday	18/10/2019	Downer World Cup 9's Day 1	12,528	NRL
Sunday	20/10/2019	Downer World Cup 9's Day 2	15,684	NRL
Saturday	26/10/2019	WSW v Sydney FC	28,519	A-League
Saturday	2/11/2019	WSW v Brisbane Roar	14,216	A-League

Total attendance

512,087

Total number of events

31

Appendix B – TfNSW Advice

The email below provides advice from TfNSW on traffic and patron movement data and the Traffic and Pedestrian Management Plan.

From: Stephen Elliott [<mailto:Stephen.ELLIOTT@tmc.transport.nsw.gov.au>]
Sent: Thursday, 21 November 2019 14:30
To: Tim Brady <TimB@nsw.venueslive.com.au>
Cc: Todd Pittaway <todd.pittaway@tmc.transport.nsw.gov.au>; Rahat Kaul <Rahat.KAUL@tmc.transport.nsw.gov.au>; Amanda Carbery <AmandaC@nsw.venueslive.com.au>; Joe Morabito <Joe.MORABITO@tmc.transport.nsw.gov.au>; David Carroll <David.CARROLL@tmc.transport.nsw.gov.au>
Subject: FW: Bankwest Stadium DA Modification response to submissions

Hi Tim

In regard to your request I pass on the following information:

- a) Traffic and patron movement data from any 'back-to-back' events held to date - Please see the table below
- b) Note from Transport stating that it supports an amendment to the existing Traffic and Pedestrian Management Plan as opposed to the preparation of a new one relative to the construction of the PLR. - There should be no change to the current O'Connell St road closure plan for the stadium. Although there will need to be a review of traffic flow, VMS management, and the event Rideshare Geo-fence when both O'Connell St is closed for Stadium event bump-out and Church St is closed for Light rail/pedestrian areas.

Event Date	Day	Event Details	Venue	Actual Crowd	Rail		Enhanced Routes		Accessible Shuttle		Public Transport	
					Ingress	Egress	Ingress	Egress	Ingress	Egress	Percentage Ingress	Percentage Egress
4-May-19	Saturday	SG Ball & Harold Matthews Cup Grand Finals (NSWRL) (Non integrated ticket event)	Bankwest Stadium									
5-May-19	Sunday	NRL Premiership Round - 8 - Eels v Dragons	Bankwest Stadium	25,872	9,065	10,995	1,159	911	46	43	39.70%	46.18%
7-Jun-19	Friday	NRL Premiership Round - 13 - Tigers v Raiders	Bankwest Stadium	12,585	4,410	5,348	463	544	22	33	38.89%	47.08%
8-Jun-19	Saturday	Super Rugby Round - 17 - NSW Waratahs v Brumbies	Bankwest Stadium	12,016	4,210	5,107	471	490	37	41	39.27%	46.92%
6-Sep-19	Friday	NRL Premiership Round - 25 - Eels v Sea Eagles	Bankwest Stadium	25,034	8,712	10,640	1,101	901	27	39	39.31%	46.26%
7-Sep-19	Saturday	Wallabies v Samoa (International Rugby Union)	Bankwest Stadium	16,091	5,638	6,838	605	682	33	47	39.00%	47.03%
18-Oct-19	Friday	RL World Cup 9s (International Rugby League)	Bankwest Stadium	12,528	4,390	5,324	431	571	27	36	38.69%	47.35%
19-Oct-19	Saturday	RL World Cup 9s (International Rugby League)	Bankwest Stadium	15,684	5,495	6,665	527	728	34	42	38.61%	47.41%