



**Office of
Environment
& Heritage**

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SSD-9249

Ms Karen Harragon
Director, Social and Other Infrastructure Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Aditi Coomar

Dear Ms Harragon

**Sydney Football Stadium Redevelopment – Concept Proposal and Stage 1 Demolition - 40-44
Driver Avenue, Moore Park (SSD-9249) – Environmental Impact Statement**

Thank you for your letter of 12 June 2018 received by the Office of Environment and Heritage (OEH) requesting comments on the Environmental Impact Statement (EIS) for the above development.

OEH has reviewed the relevant documents and provides recommendations and comments in Attachment A.

If you have any queries regarding this matter, please contact Janne Grose on **t**:8837 6017 or **e**:
janne.grose@environment.nsw.gov.au

Yours sincerely

ALEX GRAHAM
Director
Greater Sydney

Attachment A

Sydney Football Stadium Redevelopment – Concept Proposal and Stage 1 Demolition - 40-44 Driver Avenue, Moore Park (SSD-9249) – Environmental Impact Statement

Office of Environment and Heritage (OEH) has reviewed the following documents:

- Environmental Impact Statement – June 2018
- SEARs for SSD-9249 – 3 May 2018
- Biodiversity Development Assessment Report – 24 May 2018
- Arboricultural Impact Assessment – 22 May 2018 – Rev B
- Stormwater and Flooding Assessment by Arup – 4 Jun 2018 – Rev 3
- Urban Design Guidelines – 6 June 2018

and provides the following comments.

Biodiversity

The EIS indicates the site landscaping and tree planting will be detailed in the Stage 2 Development application (Section 6.4.2, page 82). It notes it is proposed to enhance planting on the site with 95% of the new vegetation to be Australian native species (Section 5.1.5, page 59). The Urban Design Guidelines for the development specify priority should be given to using endemic species (page 166) but the list of potential tree species provided in the Arboricultural Impact Assessment for the site include Hoop Pine (native to northern NSW and Queensland), Norfolk Island Pine (endemic to Norfolk Island), and Illawarra Flame tree.

OEH recommends the site landscaping uses a diversity of native provenance trees, shrubs and groundcover species from the relevant native vegetation community (or communities) that once occurred at the site to improve biodiversity.

There are numerous benefits in using a diversity of local native plants including:

- preservation of the biodiversity values of the local area
- provision of the most suitable food and habitat for local native fauna including nectar for pollinators (moths, butterflies, bees etc) which provide a food source for local native birds
- a stepping stone for more mobile native fauna to move across the landscape.

OEH notes that the EIS identifies the potential to re-establish vegetation suitable for foraging by the Grey-headed Flying-fox and the installation of an artificial microbat roost structure within the future landscape design, which will be the subject of the Stage 2 Development Application (DA). At Stage 2 DA stage it is recommended that advice from OEH be sought in relation to this aspect of the proposal.

Flood

It noted that the project is in a preliminary stage and will be subject to detailed design and a Stage 2 SSDA application. Therefore, comment is not provided on the adequacy of flood risk analysis for the final redevelopment of the site as this will be subject of the Stage 2 SSDA application. It is expected that flood risk comments will be sought from OEH at the relevant time in the future.

However, it is necessary to stress at this stage of the overall plan for the site that there are significant overland flow issues that potentially increase flood risk to life and property. In this regard the Stormwater and Flooding Assessment Report (SFA) adequately investigates one possible in-principle mitigation option for the site. The report also adequately reviews existing flood risk modelling as well as undertaking further modelling specific to the site and considering ARR2016 methodologies.

Section 4.3 of the SFA (Flood Risk Management Recommendations) is a comprehensive summation of issues that will require detailed considerations at the Stage 2 DA stage of the overall redevelopment proposal. All of the recommendations are supported.

It is recommended the consent authority seeks further advice from OEH on floodplain risk management aspects at Stage 2 DA.

Aboriginal cultural heritage

The EIS notes no sub-surface works are included in the Stage 1 demolition that would impact archaeology but it indicates there is potential for construction of the new stadium to impact Aboriginal archaeology during excavation, piling and other ground intrusive works which will be subject to detailed design and further assessment as part of the Stage 2 development application (page 102). The EIS includes a mitigation measure that an Aboriginal Cultural Heritage Assessment Report is to be prepared (ACHAR) and submitted with the Stage 2 Development Application (pages 113 and 117). OEH supports the preparation of an ACHAR.

(END OF SUBMISSION)