

11 March 2021

Our Ref: R/2019/2/G  
File No: 2021/098818  
Your Ref: SSD 9835 MOD 4

Rebecca Sommer  
Principal Planning Officer  
Department of Planning, Industry and Environment

By Planning Portal

Dear Rebecca

**Sydney Football Stadium Stage 2 – Modification 4 Photovoltaic cell changes (SSD 9835 MOD 4)**

Thank you for your correspondence dated 23 February 2021, requesting for the City of Sydney Council (“the City”) to comment on the subject modification application. It is noted that the proposal involves the relocation of photovoltaic (PV) cells from the stadium’s roof to Level 5 and a reduction to the amount of kilowatts peak generated from 350 to 150 kWp.

The City has reviewed the accompanying documentation and acknowledges the briefing provided to City staff in October 2020. It is understood that design innovations, structural implications, roof profile factors and feasibility have led to the proposed reduction of approximately 42% of on-site renewable energy generation.

The approved development illustrated substantial PV zones located on the roof of the stadium. It is disappointing that design refinement at this stage has significantly eroded and misrepresented the provision of on-site energy generation for the development.

Whilst it is noted that the development would maintain a LEED gold rating, carbon emissions and operational energy use are among the most significant impacts of the redevelopment. The City has previously stated that the LEED rating system is not the most appropriate measure of future environmental performance in the Australian context. As shown in this example, where a LEED gold rating is to be achieved and a reduced commitment to renewable energy is an outcome. This indicates that rating schemes alone may not deliver the appropriate performance outcomes and meet community expectations.

Large scale redevelopment projects in urban areas provide significant opportunities to establish local renewable generation facilities and contribute to the NSW Government’s greenhouse gas emission targets of 35% cut in emissions by 2030.

It is the City’s expectation that a development of this scale and as a major public infrastructure project, would exceed and strive for excellence in sustainability and environmental performance. For this development, the City is not satisfied that a genuine effort has been made to explore other means of energy efficiency or consider other sustainable initiatives in other aspects of the development to compensate for the loss of renewable energy generation.

At a minimum, the City recommends that a commitment to purchase off site renewable energy offsets for up to a 10-year period be considered through a Power Purchase Agreement (PPA) or similar arrangement for the redevelopment of Sydney Football Stadium. Overall, a greater effort must be demonstrated to showcase environmental sustainability.

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

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', with a large loop at the bottom left and a horizontal stroke at the end.

**Graham Jahn** AM LFRAIA Hon FPIA

**Director**

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