



Our ref: DOC20/633938

Senders ref: SSD 9835 MOD 2(City of Sydney)

Rebecca Sommer  
Principal Planning Officer  
Social and Other Infrastructure Assessment  
Planning and Assessment Group  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Ms Sommer,

**Subject: Modification 2 Application to modify State Significant Development (SSD) Consent 9835 relating to the Stage 2 detailed design, construction and operation of the Sydney Football Stadium, 40-44 Driver Avenue, Moore Park.**

Thank you for your letter received 17 July 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the modification 2 application to modify State Significant Development (SSD) Consent 9835 relating to the Stage 2 detailed design, construction and operation of the Sydney Football Stadium (SFS) at 40-44 Driver Avenue, Moore Park.

The modification application seeks to integrate a new Stadium Fitness Facilities into the SFS redevelopment. This will reinstate the facilities that operated in conjunction with the former, demolished stadium at the site.

The proposed Stadium Fitness Facilities comprise:

- A low-level pavilion building located behind the southern entry abutment wall and a basement level structure, which is largely integrated into the under-croft space beneath the approved SFS entry stairs to accommodate:
  - a gymnasium, training area and three group fitness training areas
  - two (2) squash courts
  - sauna, spa, steam area
  - wet and dry change rooms and
  - day spa and treatment rooms.
- A café with indoor and outdoor seating for 250-300 people.
- A 25m long and a 50m long open-air swimming pool and surrounding areas including the design, installation and commissioning of all pool deck finishes.
- A basement level to accommodate plant and equipment.
- Associated site landscaping.
- Services and associated plant rooms.

EES have reviewed the Modification Report prepared by Ethos Urban dated 31 July 2020 and make the following comments.

### Biodiversity

Under section 7.17 of the Biodiversity Conservation Act 2016, applications for the modification of major projects must be accompanied by a biodiversity development assessment report unless the consent authority is satisfied that the modification will not increase the impact on biodiversity values. To assist Planning and Assessment Group in making this decision, EES understands that the site is developed and cleared of vegetation and buildings and so the modification is unlikely to any impact on biodiversity.

### Flooding

The flood report has not demonstrated the appropriate level of assessment of the proposed modifications. The required level of detail has not been provided and it is not possible to confirm that the proposal is suitable. EES's assessment indicates potential for unacceptable impacts.

- Flood impact assessment modelling is required but has not been completed. There is the potential for increased flood impacts on the new facilities and possible impacts elsewhere. The new facilities are in the path of overland flow and the relocation of the existing gates to Driver Avenue will change flood behaviour. Not only building footprints, but any other permanent works need to be considered, including new fencing and walls shown in architectural drawings. For example, flood behaviour would likely to be substantially altered around the proposed outdoor swimming pool as the connection to Driver Avenue via gates appears to be lost due to new boundary walls. This could increase the flood levels at the fitness facilities or stadium entries above the levels previously designed for.
- Post development scenario flood modelling is required but has not been completed. This is required for the purpose of determining local flood levels that will dictate finished floor levels of the fitness facilities.
- Proposed changes to trunk drainage have not been modelled but it needs to be demonstrated that these do not have an impact on flooding conditions. Similarly, the resultant flood levels are required to inform floor levels.
- Onsite detention tank needs to be resized for new development for proof of concept given that the works are already under construction and the ability to make modifications is compromised.

Please note from 1 July 2020, Aboriginal cultural heritage (ACH) regulation, including advice on SSIs and SSDs, is now managed by Heritage NSW. The new contact for the ACH regulation team is [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au).

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or [bronwyn.smith@environment.nsw.gov.au](mailto:bronwyn.smith@environment.nsw.gov.au)

Yours sincerely



12/08/20

Susan Harrison  
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