

10 January 2019

218948

Ms Carolyn McNally  
Secretary  
320 Pitt Street  
Sydney NSW 2000

Attention: David Gainsford (Executive Director, Priority Projects Assessments)

Dear Carolyn,

**Request for Secretary's Environmental Assessment Requirements – Stage 2 Construction and Operation  
Sydney Football Stadium Redevelopment | 40-44 Driver Avenue, Moore Park**

We write on behalf of Infrastructure NSW (the Proponent) in relation to the redevelopment of the Sydney Football Stadium at 40-44 Driver Avenue, Moore Park. The purpose of this letter is to request the issue of Secretary's Environmental Assessment Requirements for the preparation of an Environmental Impact Statement (EIS) for Stage 2, which comprises the construction and operation of the new stadium. This follows the approval of the Concept Proposal by the Minister for Planning on 6 December 2018.

The Sydney Football Stadium Redevelopment meets the criteria for State Significant Development (SSD) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) due to the provisions of State Environmental Planning Policy (State and Regional Development) 2011 as it is development for the purpose of a 'recreation facility (major)' with a capital investment value (CIV) of more than \$30 million (Schedule 1) and is also development at the Sydney Sports Stadiums Site with a CIV of more than \$10 million (Schedule 2).

A staged planning process is being undertaken for the project which includes:

**Stage 1** – Concept Proposal for the stadium envelope and supporting retail and functional uses as well as detailed development consent for the carrying out of early works comprising demolition of the existing facility and associated structures. This DA was approved by the Minister for Planning on 6 December 2018.

**Stage 2** – detailed design, construction and operation of the stadium.

This Request for SEARs relates to Stage 2.

## 1.0 Background and Project Justification

The Sydney Football Stadium (SFS) is a significant component of the sports facilities that comprise the Sydney Cricket Ground. Completed in 1988, the SFS has hosted numerous sporting events in its 30 years of operation for a number of sporting codes including football (soccer), rugby league and rugby union as well as occasional music concerts.

The NSW Stadia Strategy 2012 provides a vision for the future of stadia within NSW, prioritising investment to achieve the optimal mix of venues to meet community needs and to ensure a vibrant sports and event environment in NSW. A key action of the strategy included the development of master plans for Tier 1 stadia and their precincts covering transport, integrated ticketing, spectator experience, facilities for players, media, corporate and restaurant and entertainment provision. SFS is one of three Tier 1 stadia within NSW, the others being Stadium Australia (Olympic Park) and the Sydney Cricket Ground.

In order to qualify for Tier 1 status, a stadium is required to include:

- Seating capacity greater than 40,000;
- Regularly host international sporting events;
- Offer extensive corporate facilities, including corporate suites, open-air corporate boxes and other function/dining facilities; and
- Be the home ground for sporting teams playing in national competitions.

In a competitive rectangular stadium landscape nationally, the existing Allianz Stadium is now facing serious commercial and operational challenges in remaining relevant and competitive for existing and future hirers and patrons. Owing to the age of SFS, there are a number of deficiencies in the provision of facilities that are required to function as a modern and competitive Tier 1 stadium. The stadium has aged poorly and fails to meet modern expectations of a Tier 1 stadium in terms of patron experience, crowd management, safety/security, accessibility, facilities for core tenants, operational efficiency, premium hospitality and food/beverage offerings and media requirements.

The redevelopment will include demolition of the existing facility and replacement with a modern, globally competitive stadium that achieves the requirements for a Tier 1 stadium to meet future requirements to:

- Create a flexible venue suitable for sports and major events alike;
- Create a precinct well connected to the city;
- Include technology for the future;
- Create a venue for professional sport;
- Create a publicly accessible entertainment and recreational facility; and
- Create a sustainable future.

The SFS Redevelopment will create a new stadium with up to 45,000 seats through a range of seating styles and corporate facilities. The stadium will include state of the art technology throughout to improve the fan experience. Sightlines will be improved and facilities including catering, amenities and accessibility will be designed to service future needs, creating a world-class customer experience commensurate with Sydney's status as a global city.

## 2.0 State Significant Development Consent SSD 9249

The Minister for Planning granted development consent on 6 December 2018 for the Concept Proposal and demolition for the Sydney Football Stadium Redevelopment, comprising:

*Concept development application for the redevelopment of Sydney Football Stadium including:*

- *A Concept Proposal comprising:*
  - *a maximum building envelope for the stadium including basement and a roof over all permanent seating;*
  - *maximum stadium capacity of 45,000 seats (55,000 patrons in concert mode);*
  - *member areas, premium box/terrace, function lounge and corporate suite operations;*
  - *flood lighting, stadium video screens and ancillary fittings;*
  - *team, media and administration facilities, food and beverage areas;*
  - *new playing pitch and provision for ancillary uses;*
  - *public domain works and landscaping; and*
  - *identification of the existing Moore Park Carpark 1 (MP1) as the demolition and construction compound.*

- *Concurrent Stage 1 works comprising:*
  - *demolition of the existing stadium including the existing Sheridan, Roosters, Waratahs, Cricket NSW Administration Building and Indoor Wickets to ground level (existing slab level);*
  - *removal of 26 trees; and*
  - *use of the existing MP1 as the demolition compound.*

Pursuant to Section 4.24 of the EP&A Act, “*while any consent granted on the determination of a concept development application for a site remains in force, the determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site*”. Accordingly, Stage 2 will be consistent with the Concept Proposal.

### 3.0 The Site

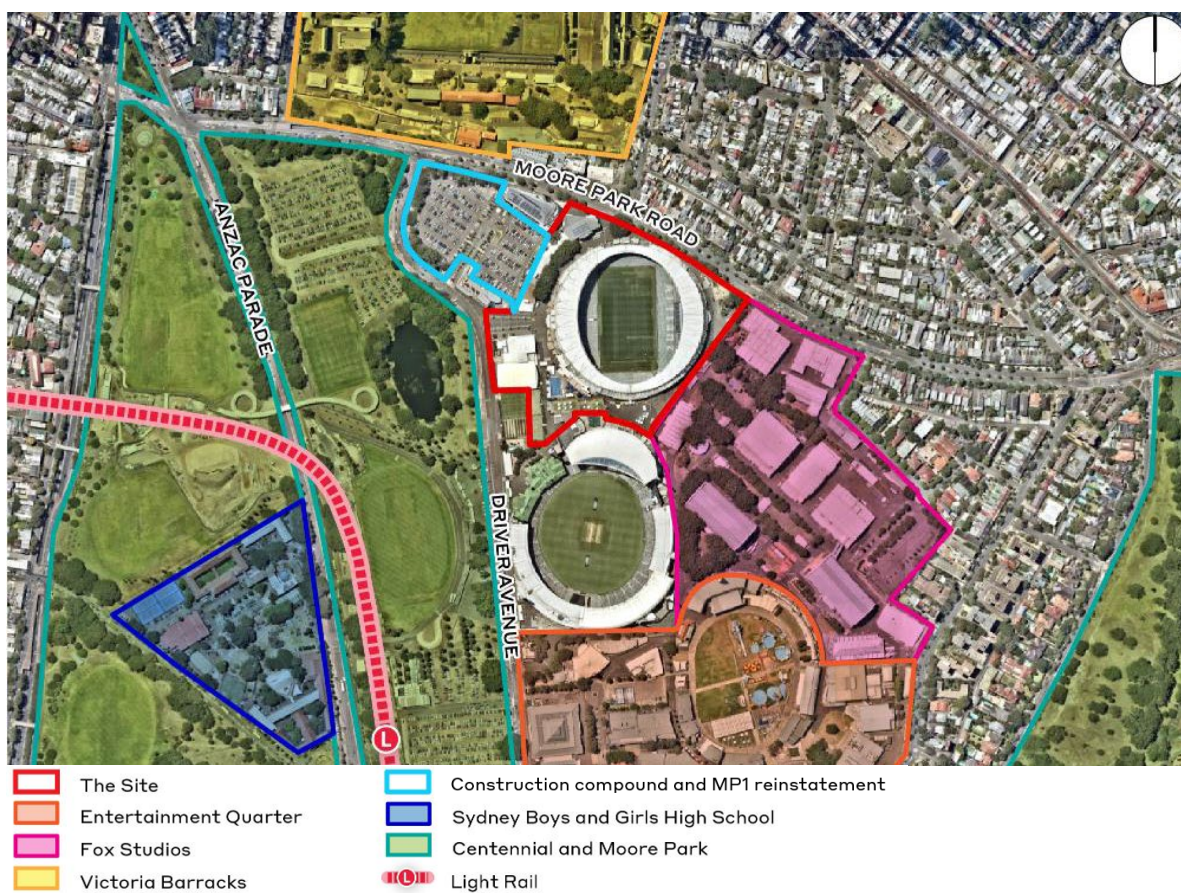
The site is located at 40-44 Driver Avenue Moore Park within the Sydney Cricket Ground Precinct. It is bound by Moore Park Road to the north, Paddington Lane to the east, the existing Sydney Cricket Ground stadium to the south and Driver Avenue to the west.

The site is legally described as Lots 1528 and 1530 in Deposited Plan 752011 and Lot 1 in Deposited Plan 205794. The site is Crown Land, with the Sydney Cricket Ground and the Sydney Sports Ground Trust designated as the sole trustee under the *Sydney Cricket and Sports Ground Act 1978*. The site is wholly contained within designated land controlled by the Sydney Cricket and Sports Ground Trust (SCSGT) under Schedule 2A of the *Sydney Cricket and Sports Ground Act 1978*.

The site is located within the City of Sydney local government area. Location and site plans are included below as **Figures 1** and **2** respectively.

The site is largely surrounded by Centennial and Moore Parks, the Fox Studios and Entertainment Quarter precincts and the residential suburb of Paddington. Located approximately 3km from the Sydney CBD, the site is connected to Sydney’s transport network through existing bus routes and will benefit from a dedicated stop on the soon to be completed Sydney CBD and South East Light Rail.







## 4.0 Development Description

The proposed development, consistent with the Concept Proposal, will comprise:

- Construction and operation of a new stadium with up to 45,000 seats (55,000 capacity in concert-mode), including playing pitch, grandstands, administration areas, food and drink kiosks, corporate facilities and all other aspects of a modern stadium;
- Vehicular and pedestrian access and circulation arrangements, including excavation to deliver a partial basement level for internal loading and servicing at the playing pitch level;
- Reinstatement of the MP1 car park following the completion of construction;
- Public domain improvements; and
- Signage, including building identification signage, business identification signage and a wayfinding signage strategy.

The Stage 2 EIS will assess the detailed design, construction and operation of the stadium. Detailed design of the stadium is by Cox Architecture, in partnership with Aspect Studios, who were selected as the project architect following a Competitive Design Alternatives Process. The stadium design will be consistent with the building envelopes approved under the Concept Proposal and will include materials and design treatments consistent with the Final Urban Design Guidelines. The DA will include detailed public domain plans demonstrating the future character and uses for the various zones surrounding the stadium and how these will integrate with the stadium design and function.

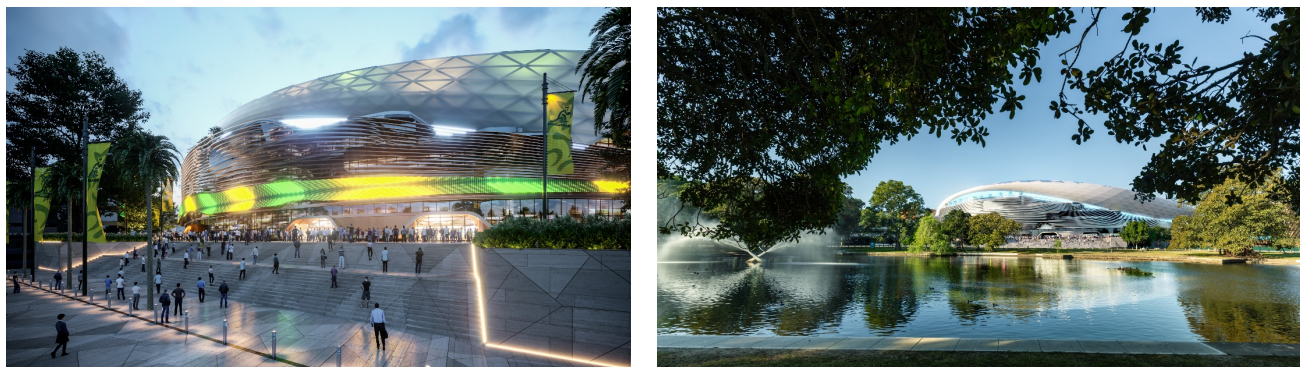
Indicative photomontages of the proposed stadium are included in **Figures 3 to 5**.



**Figure 3** Indicative photomontages of the proposed stadium looking towards the Sydney CBD

Source: Cox Architecture





**Figure 4** Indicative photomontages of the proposed stadium

Source: Cox Architecture



**Figure 5** Indicative photomontage of the interior of the proposed stadium

Source: Cox Architecture

## 5.0 Statutory and Strategic Planning

The following comprise the key legislation and environmental planning instruments that apply to the project:

- *Environmental Planning and Assessment Act 1979*
- *Biodiversity Conservation Act 2016*
- *Heritage Act 1977*
- State Environmental Planning Policy (State & Regional Development) 2011
- State Environmental Planning Policy No.55 – Remediation of Land
- State Environmental Planning Policy (Infrastructure) 2007
- Sydney Local Environmental Plan 2012

The proposal is also required to be consistent with the following legislation where relevant:

- *Environment Protection and Biodiversity Conservation Act 1999* (Cth)
- *Sydney Cricket and Sports Ground Act 1978*
- *Sporting Venues Authorities Act 2008*
- *Work Health and Safety Act 2011*
- *Roads Act 1993*
- *National Parks and Wildlife Act 1974*
- *Protection of the Environment Operations Act 1997*
- *Gaming and Liquor Administration Act 2007*
- *Liquor Act 2007*

### **5.1 Environmental Planning and Assessment Act 1979**

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for State Significant Development. Under Section 89D of the EP&A Act, the Minister for Planning is the consent authority for State Significant Development. Section 78A(8A) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS).

Pursuant to Section 4.24 of the EP&A Act, the determination of any further development application cannot be inconsistent with the concept proposal for the development of the site approved under the Concept Proposal. The EIS will demonstrate that Stage 2 is not inconsistent with the approved Concept Proposal.

### **5.2 Sydney Cricket and Sports Ground Act 1978**

Section 16A(1) of the *Sydney Cricket and Sports Ground Act 1978* (SCSG Act) provides that the Minister for Sports may approve the carrying out of improvements at the SFS and SCG, including demolition and erection of a new building. Where the Minister for Sports grants approval under Section 16A, the EP&A Act does not apply to the carrying out of the approved improvements. At this stage, Infrastructure NSW are seeking to prepare an EIS for Stage 2 of the project pursuant to the EP&A Act as outlined in Section 5.1 above.

### **5.3 State Environmental Planning Policy (State & Regional Development) 2011**

This SEPP identifies development that is deemed to be State Significant Development. Clause 13 of Schedule 1 of the SRD SEPP provides that 'recreation facilities (major)' with a capital investment value (CIV) that exceeds \$30 million is State Significant Development. As such the project is declared to be State Significant Development (SSD) for the purposes of the EP&A Act. Furthermore, Clause 7 of Schedule 2 of the SRD SEPP provides that development on land within the Fox Studios, Moore Park Showgrounds and Sydney Sports Stadiums Site with a CIV that exceeds \$10 million is declared to be State Significant Development (SSD) for the purposes of the EP&A Act.

### **5.4 Sydney Local Environmental Plan 2012**

The site is subject to the Sydney LEP 2012 and is zoned SP1 Special Activities- Recreation Facility (major). The development is classified as a 'recreation facility (major)' and is permitted with development consent in the zone. There are no building height or floor space ratios applicable to the site under the LEP.

Clause 6.21 of the Sydney LEP requires a Design Excellence Competition to be held in accordance with the City of Sydney Competitive Design Policy, unless a waiver is granted. A Competitive Design Alternatives Process has been undertaken by Infrastructure NSW in accordance with the Competitive Design Policy. This resulted in the selection of Cox Architecture, in partnership with Aspect Studios, as the project architect.

Clause 7.20 of the Sydney LEP requires the preparation of a development control plan (DCP) for any new development on sites with an area of more than 5,000m<sup>2</sup>. In accordance with Section 83C of the EP&A Act, the approval of the Concept Proposal satisfies this requirement.

## 6.0 Preliminary Key Issues Identification

The following potential impacts and anticipated key issues have been identified:

- **Consistency with Concept Proposal:** The approved Concept Proposal establishes an envelope for the stadium and high-level parameters for the stadium's design and operations. The EIS will provide an assessment of the proposal's consistency with the Concept Proposal. A primary component of this assessment will be the consistency with the building envelopes, along with the consistency of the project with the future environmental assessment requirements and final mitigation measures outlined in the consent.
- **Urban Design and Built Form:** A Competitive Design Alternatives Process has been undertaken in accordance with the City of Sydney Competitive Design Policy, which resulted in the selection of Cox Architecture, in partnership with Aspect Studios, as the project architect. The EIS will include details of this process, and outline how the proposed stadium demonstrates design excellence and is consistent with the Final Urban Design Guidelines which were approved as part of the Concept Proposal.
- **Public domain:** Detailed landscape and public domain plans will be provided with the EIS. The public domain and landscaping will be consistent with the Final Urban Design Guidelines approved as part of the Concept Proposal. All aspects of the public domain including pathways, landscape concept, public art, lighting and interface with the surrounding public domain will be addressed. Details of usage and access to the proposed public domain during event and non-event periods will be outlined. Crime prevention through environmental design and security management principles will also be addressed.
- **Views and visual impact:** A Visual and View Impact Assessment will be provided with the EIS. The assessment will utilise the public and private viewpoints which were established and assessed as part of the Concept Proposal, with the assessment being updated to have regard to the visual impacts of the detailed stadium design.
- **Heritage:** The site is surrounded by and includes a range of different heritage items of varying levels of significance. Key heritage impacts will be considered in the detailed design and construction of the new stadium. The detailed design of the stadium will be required to demonstrate consistency with the heritage mitigation measures provided in the Concept Proposal, and will include measures to interpret the heritage values of the site through public domain and public art.
- **Transport and access:** A transport assessment will be prepared for the construction and operational phases of the stadium, building upon the assessment undertaken for the concept proposal as part of the Concept Proposal. The report will consider site access and transport management arrangements during event and non-event periods, having regard to the approved Concept Proposal. The report will also assess the traffic impacts associated with the construction of the stadium.
- **Noise and Vibration:** Noise and vibration impacts of the construction and operation of the future stadium will be assessed with regard to potential impacts on nearby sensitive receivers. Noise from the Sydney Football Stadium is currently regulated by a statutory Notice of Preventative Action No.1003904 issued by the EPA. A noise and vibration assessment will be provided which demonstrates that the use of the proposed stadium would comply with this regulation framework, as well as any suggested improvements to the regulatory approach for noise and vibration from the future stadium.
- **Ground conditions:** A Phase 2 Detailed Site Contamination Assessment will be provided detailing the findings of further investigations of potential contamination within the site. If contamination is identified, a Remedial Action Plan will be prepared and reviewed by an EPA-accredited Site Auditor and provided to demonstrate how the site will be made suitable for the proposed use.
- **Social impacts:** A series of technical papers outlining how stadium and events will operate, and the proposed measures employed to minimise and manage potential social impacts on the broader community. In particular, the EIS will be accompanied by an Event Management Plan, Event Access Strategy, CPTED Assessment,



Security Risk Assessment Strategy and Anti-Social Behaviour Strategy, in addition to other technical studies dealing with the potential environmental impacts on the amenity of the locality.

- **Community and stakeholder engagement:** A Community Consultative Committee (CCC) will be established for the project in accordance with the requirements of SSD 9249. The proponent will also consult with the relevant government and community stakeholders as outlined in Section 8.0 and detail the outcomes of this consultation in the EIS.

## 7.0 Expected Deliverables

The following table sets out those technical studies that were prepared for the Concept Proposal and Demolition, and those which are anticipated for the Stage 2 planning application.

Technical Study/ Report	Concept Proposal & Demolition (already approved)	Stage 2 (proposed)
Environmental Impact Statement	✓	✓
Site Survey	✓	✓
Design Excellence	✓ Strategy	✓ Competitive Design Alternatives Report
Urban Design Guidelines	✓	✗
Architectural Design Statement	✗	✓
Architectural Drawings	✗	✓
Landscape and Public Domain Plans	✗	✓
Arboricultural Impact Assessment	✓	✓
Shadow Diagrams	✓	✓
Events Management Plan	✗	✓
Construction Management Plan	✓	✓
Consultation Outcomes Report	✓	✓
Visual and View Assessment	✓	✓
Wind Assessment	✓ Desktop/ design principles	✓ Quantitative (including Pedestrian Wind Assessment)
Transport Impact Assessment	✓	✓
Event Access Strategy	✗	✓
Travel Demand Management Strategy	✗	✓
Green Travel Plan/ Transport Access Guide	✗	✓
Wayfinding and Signage Strategy	✗	✓
Noise and Vibration Assessment	✓	✓
Heritage Impact Statement	✓	✓
Archaeological Assessment	✓	✓
Heritage Interpretation Strategy	✗	✓
Aboriginal Cultural Heritage Assessment Report	✗	✓
Social and Economic Impact Statement	✓	✗
Stormwater and Flooding Report	✓	✓
Erosion and Sediment Control Plan	✓	✓

Technical Study/ Report	Concept Proposal & Demolition (already approved)	Stage 2 (proposed)
Biodiversity Development Assessment Report	✓	✓
Contamination	✓ Phase 1 Assessment	✓ Phase 2 + Remedial Action Plan (if required) + Site Auditor's Statement (if required)
Geotechnical Assessment Report	X	✓
Groundwater Assessment	✓	✓
Infrastructure Management Strategy	✓	✓
Air Quality Impact Assessment	✓	✓
Lighting Strategy and Light Spill Assessment	X	✓
Reflectivity Assessment	X	✓
Waste Management Plan	X	✓
CPTED Assessment	X	✓
Anti-Social Behaviour Strategy	X	✓
Security and Risk	X Security Principles Report	✓ Security Risk Assessment Strategy
ESD Statement	✓	✓
Structural Design Statement	X	✓
BCA Statement	X	✓
Disability Access Review	X	✓
Fire Engineering Statement	X	✓

## 8.0 Consultation

In developing the EIS, the Proponent will undertake consultation with the following:

- City of Sydney Council
- Transport for NSW (including the Sydney CBD Coordination Office)
- Roads and Maritime Services
- Office of Environment and Heritage
- Heritage Division NSW
- Environment Protection Authority
- Centennial and Moore Park Trust
- Future tenants of the stadium
- Local stakeholders (including community groups)
- Sydney Cricket Ground members
- Surrounding residents and businesses



## 9.0 Conclusion

We trust that the preceding information is sufficient to allow the NSW Department of Planning and Environment to issue SEARs for the preparation of an Environmental Impact Statement for Stage 2 of the Sydney Football Stadium Redevelopment. By rebuilding the Sydney Football Stadium, the NSW Government is ensuring that the State's major sporting stadia network delivers a world-class experience to attract investment and tourism in a competitive and international landscape. The detailed design of the stadium by Cox Architecture, in partnership with Aspect Studios, achieves a high standard of design excellence which achieves the functional requirements for a modern stadium and which is appropriate to the local context. The proposed development is consistent with the Concept Proposal approved by the Minister for Planning, and will ensure a high-quality development with no unacceptable adverse impacts. Should you have any queries regarding this matter, please do not hesitate to contact me.

Yours sincerely,



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