

8 February 2022

Our Ref: R/2019/2/J  
File No: 2022/040870  
Your Ref: SSD-9429-Mod-6  
SSD-9835-Mod-7

Ferdinando Macri  
Department of Planning, Industry and Environment  
via Planning Portal

Dear Ferdinando,

**Advice on Response to Submissions  
Sydney Football Stadium - New Precinct Village and Carpark  
Stage 1 - SSD-9429 - Modification 6; and  
Stage 2 - SSD 9835 - Modification 7**

Thank you for your correspondence dated 24 January 2022 inviting the City of Sydney Council (the City) to provide advice on the Response to Submissions (RtS) provided by Venues NSW, relating to the abovementioned modification applications to SSD-9428 (Stage 1 Concept) and SSD-9835 (Stage 2 Detailed Design).

In summary, the issues raised in the City's previous letter dated 29 November 2021 have not been adequately addressed in the RtS. Additionally, the submission presents new concerns which have largely come about from a value management exercise.

**Therefore, the City maintains its objection to the proposal.**

A summary of the key outstanding issues is outlined below:

**1. Lack of certainty around removal of on grass car parking**

The RtS has not adequately addressed the City's concerns regarding the lack of certainty and enforceability of the removal of on-grass car parking at Moore Park. There remains no clear commitment for the removal of on-grass car parking at both EP2 and EP3.

The issues raised in Part 1.2 of the City's previous letter remain relevant, including the enforceability of proposed condition A57 and the lack of certainty around EP3, which falls under the responsibility of Greater Sydney Parklands, not Venues NSW.

The City reiterates that the removal of on-grass parking is a long-term community expectation and its ongoing operation prevents restoration of this critical community public space asset.

Since our previous letter, there has been increased uncertainty around the future removal of the on-grass car parking in public discourse. It is of key importance that any consideration of increased car parking on the subject site be met with absolute certainty and a strong commitment with clear timeframes for the removal of on-grass parking at both EP2 and EP3.

## 2. Transport and traffic impacts

The supplementary traffic report prepared by JMT Consulting, dated 15 December 2021, has been reviewed. Overall, the RtS has not adequately addressed the issues raised by the City regarding transport and traffic impacts.

- The report presents modelling at two isolated intersections, being Moore Park Road/ Driver Avenue and Lang Road/ Moore Park Road. It is noted that these are roads are Council roads, not Transport for NSW roads. The City's concern was related to the congestion of local roads and this has not been adequately addressed in the modelling.
- The City requested a network model to assess the right turn from Driver Avenue and merge with the existing traffic on Moore Park Road. This has not been provided.
- The RtS continues to focus on less frequent, big stadium events, while ignoring day to day congestion in local roads. The new precinct village will accommodate more frequent mid-sized events. The large number of proposed car parking spaces will mean these events will have a high percentage of people driving and will have a more frequent impact on the surrounding road network. The current assessment does not address these matters.
- The City's recommendation for restricting on-site car parking, including removal of all on-grass event parking, is the most effective approach to reducing car traffic. The Green Travel Plan and other soft measures can be seen as 'catalyst', however without reducing car parking on the site, the GTP will not work to achieve sustainable transport outcomes.

### Recommendations

- The City's position outlined in our previous letter dated 29 November 2021 still stands.
- The City would support 460 additional structured car parking spaces (total 1,000) within the new carpark as a maximum, subject to the permanent and immediate removal of 2,100 existing on-grass car parking spaces across the precinct.

## 3. Landscaping of the site

The landscape issues previously raised by the City have not been clarified and remain unresolved.

The value management exercise has resulted in the dilution of the landscape design and significantly reduces the proposal's ability to exhibit design excellence.

The amended scheme is not supported from a landscape perspective. The reduced quality of the landscape is at odds with two key Premier Priorities – *Greening our City* with tree planting to reduce urban heat island effect; and providing *Greener Public Spaces* that include free and publicly accessible parks, gardens and sports fields and walkable shady streets and plazas.

The key outstanding issues are as follows:

- **Green roof above Tennis Club**

- The plans show that the green roof above the Tennis Club has been removed and replaced with pebbles. This reduces the overall greening of the site, local biodiversity, cooling, thermal efficiency, water polishing and stormwater runoff benefits that result from a green roof. The replacement with pebbles is a poor outcome and is not supported by the City.
- In addition to providing a green roof, this is also a prime opportunity to provide PV panels. [Research led by UTS](#) has found that combining solar panel installations with green roofs can result in benefits to energy production, stormwater filtration and animal biodiversity.

The Design Integrity Panel (in minutes dated 6 December 2021) queried whether PV array will be provided on top of the tennis club roof and the applicant advised that the roof is expected to be covered by PV panels.

The provision of PV panels has already been significantly reduced under Mod 4 of SSD-9835. Therefore, PV panels should be provided on the Tennis Club roof and details of this should be shown on the architectural plans and form part of any amended consent.

- **Mechanical vent near play area**

- Drawing no. LA201[3] shows a large carpark mechanical vent located on the western edge of the proposed playground and community pavilion. This is a poor design in terms of air quality, thermal comfort and safety near public and play amenities and is not supported.

- **Trees east of tennis courts**

- The RtS clarifies that trees east of the tennis courts are within permanent perimeter planters. However, the majority of small trees are within small removable planters in the 'public area' of the plaza (code F1/ F2/ F3). The planters have insufficient soil volume to support healthy growth of small trees and have been designed to be removed in event mode.

This layout results in limited shade to the large brick paved area and no guarantee that the planters will remain insitu, resulting in limited urban greening and comfort.

It is recommended that the design be amended to provide large permanent tree planters with medium to large shade trees, providing permanent shade trees to cool the plaza and to provide shade relief for visitors and the public.

- **Other issues not addressed in RtS**

- The design and purpose of each mechanical plant room has not been confirmed.
- Details and sections regarding the new trees on level 0 carpark growing out of concrete between pedestrian bridges above have not been provided.

### Recommendations

- The Tennis Club Roof should feature a green roof and PV panels.

- The trees east of the tennis courts must be large, permanent tree planters with medium to large shade trees to provide permanent shade.
- Relocate mechanical stacks and kiosks out of play and landscape spaces.
- Other issues not addressed in the RtS should be clarified by the applicant.

#### **4. Tree management**

The Response to Submissions has not addressed the City's previous concerns regarding tree removal and tree impacts. Instead, the design has progressed to require the removal of an additional 6 trees and proposes further impacts to trees to be retained.

The City's position is summarised as follows:

- With sufficient replacement planting, the removal of the 34 trees with a 'consider for removal' or 'priority for removal' rating is supported.
- The removal of trees with a 'priority for retention' or 'consider for retention' value rating is not supported.
- The impacts to trees can be significantly reduced through alternative design solutions. These are outlined in the 'recommendations' below.

#### **Recommendations**

- The 'new pedestrian entry' on the corner of Moore Park Road and Driver Avenue must be redesigned using tree sensitive methods to retain trees numbered 137 and 138 - i.e. the pathway being on or above existing grade and utilising the current pedestrian entrance on Driver Avenue.
- That the proposed basement and stairs should be setback to retain trees numbered 137, 138, 147, 148, 151, 195 and 303. Amendments to the internal carpark layout may allow for a reduction of the basement footprint. The amended basement footprint must be based on non-destructive root investigations by an AQF Level 5 Arborist.
- That the proposed temporary driveway be relocated outside the Tree Protection Zone (TPZ) of trees with a 'priority / consider for retention' rating. The removal of medium retention valued mature trees for a temporary driveway is not supported.
- The removal of tree 181 is not supported. The stormwater plans should be amended to retain trees with a 'priority / consider for retention' rating and be based on the findings of a non-invasive root investigation prior to the plans being approved. The removal of the existing tree for stormwater infrastructure that can be redesigned / relocated to retain the tree is not supported.
- That the layout/ location for the pilling rig be relocated to retain tree 187 and reduce pruning of tree 184.
- All tree pruning must be undertaken in accordance with AS 4373 2007 Pruning of Amenity Trees by an AQF Level 3 Arborist.
- All street trees surrounding the site on Council owned land must be retained and protected in accordance with AS4970-2009 Protection of Trees on Development Sites. The protection and retention of all existing street is a priority for the City of

Sydney. Trees are long term assets that the community highly values. The proposed development and associated landscaping in the vicinity of trees including street trees has a high potential to impact in their health and structure. The City of Sydney Street Tree Master Plan includes general street tree protection measures and conditions that must be followed. See Section 8 of the document linked [here](#).

- All trees to be retained within the site must be protected in accordance with AS4970-2009 Protection of Trees on Development Sites, and as specified in the *Arboricultural Impact Assessment (AIA) prepared by TreeIQ dated 6 September 2021 'Revision A'*. A Project Arborist must be engaged to assist with tree management advice during the various stages of the design and construction process. The Project Arborist should be qualified in arboriculture to Australian Qualifications Framework (AQF) level 5 or above and have at least 5 years demonstrated experience in managing trees within complex development sites.
- Tree sensitive methods as outlined within Section 3.4 of the AIA dated 6 September 2021 must be used within TPZ areas to minimise adverse impacts. Existing ground levels must be maintained, and all new structures must be designed to accommodate the trees to be retained.
- Newly planted trees must meet Australian Standard 2303: Tree Stock for Landscape Use (2015).
- Loss of existing tree canopy should be offset by replacement tree plantings that will attain a comparable size at maturity e.g. a large tree should be replaced with a tree species that will grow to a similar size.
- A detailed landscape plan, drawn to scale, by a qualified landscape architect or landscape designer should include:
  - (i) Details of earthworks and soil depths including mounding and retaining walls and planter boxes (if applicable).
  - (ii) Location, numbers, type and supply of plant species, with reference to the relevant Australian Standard;
  - (iii) Details of planting procedure and maintenance;
  - (iv) Details of drainage, waterproofing and watering systems.

## 5. Urban design

The proposed amendments resulting from value management will adversely impact the delivery of design excellence on the site. The key idea in the previous scheme was that the buildings are part of the landscape, however this is no longer achieved.

Key issues are outlined below:

- **Changes to carpark facades**
  - The 'hit and miss' brickwork provided more character and solidity to the carpark façade and the edges of the internal street. The removal of this part of the design significantly diminishes the character of the internal street.

- Opportunities for landscaping on the carpark have been significantly reduced. The brickwork provided a vertical structure for plants, which softened the façade. The general loss in vertical planting is not supported. The Design Integrity Panel commented that the landscape design should be refined to ensure planters soften the overall design. The revised plans do not reflect this aspiration.
- The change in the brickwork colour to the infill panels of the upper levels of the street frontage is not supported and is to be the same as the red/brown brick piers. This will contribute to the idea of a solid masonry wall punctuated by openings rather than a column and slab structure with infill panels.
- **Ramp changes on the eastern concourse**
  - It was not clear previously that vehicles were permitted on the upper level of the park. Pedestrians must be given priority in this space. The drawings show that the vehicle part of the ramp is wider and likely to be at a steeper grade. This grade may not be suitable for the movement impaired such as the elderly, people with prams and people in wheelchairs.

#### Recommendations

- The hit and miss brickwork should be maintained, or any alternative design must deliver greater amounts of vertical planting to soften the design.
- The upper levels of the carpark frontage should feature infill panels that match the colour of the brickwork.
- Pedestrians must be given priority on the eastern concourse and the wider ramp should be at a suitable grade for equitable access.

### **6. Heritage**

It is important that the current conditions of consent be updated to reflect the recommendations made in the Addendum HIS prepared by Artefact, dated December 2021. This includes reference to conditions relating to the Construction Heritage Management Plan, Heritage Interpretation Plan and Methodology Statement – Working Near Busby's Bore.

### **7. Sustainability**

The following issues were previously raised by the City and have not been adequately addressed by the applicant:

- **Proposed car parking spaces and sustainability**

The City's previous comments regarding reduced car parking numbers, natural ventilation of the carpark and providing a more compact footprint have not been adequately addressed by the applicant.

- **Electric vehicle charging**

- The proponent's reference to there not being any NCC requirements for electric vehicle charging is considered to be a poor response given that the NCC has clear intent to introduce a conservative requirement in 2022. The proponent's reference to NCC as a benchmark is also at odds with claims of

excellence using LEED Certification as a measurement, as LEED is an American tool using American benchmarks and 'drive to venue' habits.

- The applicant's response misrepresents the Electric Vehicle Council, who advocate strongly for provision of much more progressive provision of EV facilities as mechanism to boost uptake.
- The applicant states that "*additional chargers can be easily added as required*," however the provision of additional space for services in cable trays and slots on meter boards needs to be built in at construction stage.
- The City maintains its position that the current provision of electric vehicle supply equipment is a poor commitment and inconsistent with NSW government directions.

- **Construction materials**

The City considers that an actual carbon abatement target (for example, 75% by volume) of key materials (concrete, bricks and blockwork) would be a logical way forward, given these are already identified as the higher impact materials in terms of embodied carbon.

Should you wish to speak with a Council officer about these comments, please contact Samantha Kruize, Planner, on 9246 7263 or at [skruize@cityofsydney.nsw.gov.au](mailto:skruize@cityofsydney.nsw.gov.au).

Yours sincerely,



**Graham Jahn** AM LFRAIA Hon FPIA  
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 City Planning | Development | Transport