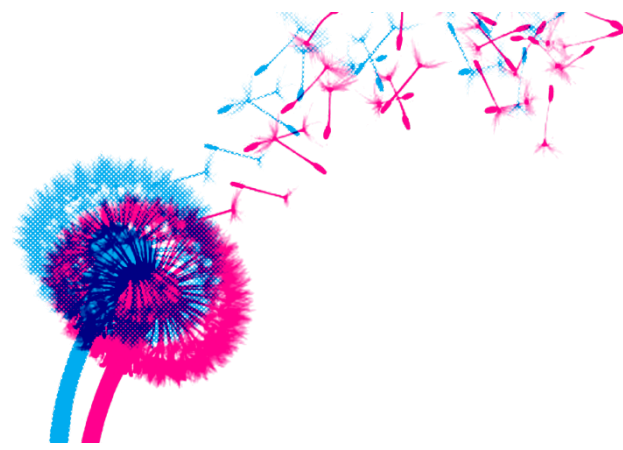


SFS Response to Submissions

(SSD9249)

Attachment 2- Detailed Response and
Clarifications for Department of Planning and
Environment

September 2018



Attachment 2 – Response to DP&E Letter dated 20 July 2018

No.	Issue Raised	Proponent's Response
	Attachment 1	
	Visual Impact Assessment	
DPE1	The submitted Visual Impact Assessment Report (VIA) indicates that the selected viewpoints have been informed by a visual catchment analysis. However, no details of the analysis have been provided.	Refer to Supplementary Visual Impact Assessment provided at Attachment 12 of the Response to Submissions.
DPE2	<p>The approach to the visual effect assessment including the terminologies used and judgements made in section 9 of the VIA need to be explained in detail and articulated to enable an informed assessment of this report including, but not be limited to, the following:</p> <ul style="list-style-type: none"> Table 2 of the VIA states that the "Level or effect" is "medium/low". However, the term "medium" and "low" are not defined in the report Appendix 1 of the VIA includes photomontages of the stadium envelope with two lines. The legend notes that the two lines relate to the "Loose Fit Envelop" and the "Proposed Outcome". The Urban Design Guidelines explains the term "Loose Fit Envelop" but not the term "Proposed Outcome" The VIA does not clearly define the term "iconic landscape element". 	Refer to Supplementary Visual Impact Assessment provided at Attachment 12 of the Response to Submissions.
DPE3	Consideration should be given to consistency of the visual assessment with the established Planning Principles at the Land and Environment Court, in the judgement for <i>Tenacity Consulting v Warringah</i> [2004] NSWLEC 140 (Principles of view sharing: the impact on neighbours).	<p>The Visual Impact Assessment has been prepared in accordance with the SEARs. The assessment of private views at Section 6.5.1 of the Environmental Impact Statement (EIS) (pages 86-88) identifies, adopts and addresses these assessment principles.</p> <p>The Applicant has undertaken further assessment in accordance with this approach which is provided at Attachment 12 of the Response to Submissions.</p>
DPE4	The photomontages indicate that there is a partial loss of views to the Sydney Cricket Ground (SCG) (Bradman Stand and Flood Light), but only a 'Low' view loss has been recorded in the VIA. It is considered that the proposal may impact on views to the SCG, a 'wayfinding' marker of the local townscape, from certain viewpoints as demonstrated by the photomontages.	This conclusion is correct and consistent with the visual assessment methodology. Whilst the proposed maximum building envelope for the new stadium will partly obscure views to the SCG from some angles, the new stadium is considered to be equally important in defining the character of the stadium precinct. The introduction of new stadium elements is consistent with the existing and intended landscape and visual character of the site, and is expected to contribute equally to local wayfinding.
DPE5	The view lines considered in the VIA should include the identified historic view lines in the draft Sydney Cricket Ground Conservation Management Plan stated in the Heritage Impact Assessment Report.	<p>The draft CMP has not been finalised or approved by Sydney Cricket Ground Trust for submission to the NSW Heritage Division for endorsement, and as such is still a working document that has not been completed. Accordingly, the draft CMP does not have any formal status in the heritage assessment of the project.</p> <p>The draft CMP was reviewed as part of the heritage assessment process as it contains historical information pertaining to the site and a physical description of the whole of the site. These elements of the draft CMP are generally not in contention, although there are some chronological errors contained within the history.</p>

No.	Issue Raised	Proponent's Response
		<p>The draft policies for the retention and conservation of the Sydney Football Stadium (SFS) remain draft and are not supported by the Sydney Cricket Ground Trust or the Applicant. It is considered that the draft CMP does not substantiate the claim of high heritage significance for the SFS.</p> <p>Given that the existing SFS is not heritage listed at either a local or State level, the draft policies in relation to the SFS within the draft CMP are not commensurate with management of a non-heritage listed item.</p> <p>Notwithstanding further assessment of the relevance of the views identified in the draft CMP to the project has been undertaken. Where relevant, additional photomontages have been prepared from the identified viewpoint and a visual assessment undertaken. This information is included at Attachment 12 of the Response to Submissions..</p>
DPE6	The VIA does not include any photomontages for the worst affected properties along Moore Park Road or for Moore Park East. These should be provided to enable assessment of visual impact.	This is not correct – Views 2 and 3 within the publicly exhibited Visual Impact Assessment are taken from Moore Park East. The Supplementary Visual Impact Assessment provided at Attachment 12 of Response to Submissions includes three additional views (Nos. 15, 16 and 17) from within Moore Park East. Additional public domain views for Moore Park Road have also been provided at Attachment 12 (Views no. 18, 19 and 20). Additional assessment of private views for dwellings along Moore Park Road is provided at Attachment 13 .
DPE7	The VIA is required to be amended to address the above issues and include further view analysis to clarify the impact of the proposed stadium envelope on SCG.	Refer to Supplementary Visual Impact Assessment provided at Attachment 12 of the Response to Submissions.
	Environmental Management and Mitigation Measures	
DPE8	To address the anticipated environmental impacts due to the proposal, a consolidated schedule of mitigation measures and management activities responding to all environmental impacts anticipated in Stage 1, should be provided.	Provided at Section 5.0 of the Response to Submissions.
	Future Design Commitments	
DPE9	A consolidated schedule of design commitments, including timing, that would be progressed as part of Stage 2 of the development should be provided.	The Final Urban Design Guidelines provided at Attachment 4 of the Response to Submissions are the final design commitments together with the Final Mitigation Measure set out in Section 5.0 of the Response to Submissions.
	Heritage	
DPE10	The submitted Heritage Impact Assessment Report (HIA) identifies Busby's Bore Conservation Management Plan (COMP) 2004. However, the components of this COMP have not been considered in assessing the impacts of the proposal on Busby's Bore.	Refer to Attachment 7 of the Response to Submissions for a detailed response to the CMP for Busby's Bore.
DPE11	Sydney Water has recently prepared a draft Busby's Bore COMP which should be addressed.	Sydney Water's Lead Heritage Advisor has advised that the Busby's Bore COMP update is ongoing and incomplete at this stage. Accordingly, Sydney Water have advised that they will not be releasing the document until it has been completed and the existing CMP should

No.	Issue Raised	Proponent's Response
		be relied upon. This is in accordance with the approach set out in the exhibited heritage assessment.
DPE12	While the proposal is for a concept building envelope, it is considered that further assessment regarding the protection of Busby's Bore during demolition and construction works would be required. The report should include a methodology of how the bore would be identified, protected, assessed and monitored throughout the demolition and construction works. The method should be included in detail in an updated Construction Management Plan, supported by the HIA. This document should be submitted for further consideration.	<p>A methodology statement for undertaking demolition activities in the vicinity of Busby's Bore and the Sydney Cricket Ground Member's Stand has been prepared by Curio Projects, Aver Consulting and Arup and is provided at Attachment 8 of the Response to Submissions.</p> <p>It is also noted, as stated by the Heritage Division in their submission, an adequate level of archaeological documentation has been undertaken at this stage with respect to potential impacts and that it is satisfied that the archaeological report submitted with the Stage 1 Development Application provides a satisfactory pathway for managing the potential archaeological issues in future applications.</p> <p>Archaeological information is not anticipated to be impacted during Stage 1 works as demolition is to ground level only, however the following recommendations are made to ensure that any future development of the site appropriately assesses and manages archaeological impacts:</p> <p><i>All recommendations of the report entitled 'Archaeological Assessment for Sydney Football Stadium, Stage 1 Concept Design' prepared by Curio Projects, dated 5 June 2018 should be implemented by the proponent.</i></p>
	Transport Assessment	
DPE13	The Transport Impact Assessment Report (TIA) considers events with integrated ticketing for vehicle and pedestrian counts. Further traffic counts of larger capacity games and games without integrated ticketing should be considered to assess impacts of such scenarios.	<p>Additional traffic and pedestrian counts were undertaken in July and August 2018 for events without integrated ticketing. These counts were agreed with Transport for NSW (Sydney Coordination Office) prior to being undertaken.</p> <p>These events included greater attendance numbers than previously surveyed events including a double header event with a combined attendance of close to 50,000 people. A summary of the surveyed events is provided in the table below.</p> <p>The results of the survey and assessment is contained within Attachment 5 of the Response to Submissions.</p>
DPE14	The TIA has not modelled the "post-event" situations or included traffic counts for "weekday events". These should be addressed via additional documentation or surveys.	This comment is addressed in Attachment 5 of the Response to Submissions.

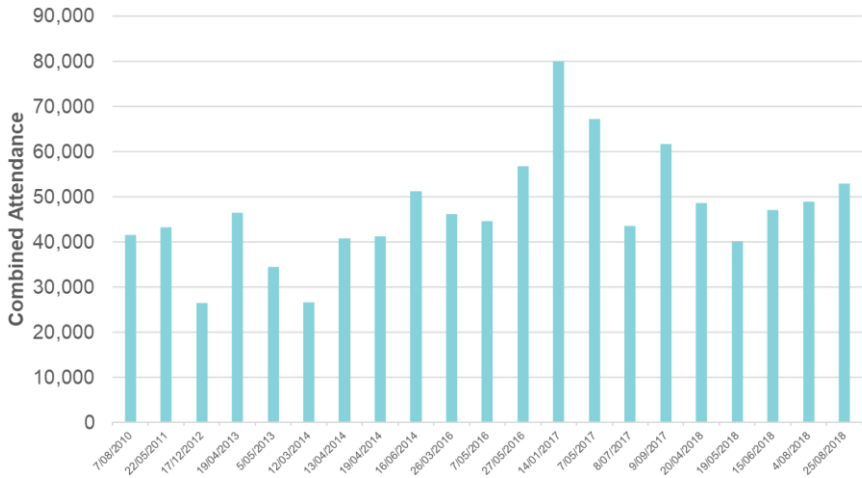
DPE15	<p>The TIA does not include details of how the data in Table 8 has been derived. Further, an explanation of the capacity numbers and modal percentages should be provided to support the findings of the analysis.</p>	<p>The process for developing the figures contained within Table 8 of the report was as follows:</p> <ol style="list-style-type: none"> 1. Mode share - existing stadium Arup undertook travel behaviour surveys at five different events over the course of 2018. This included events with smaller crowds (up to 'half full') as well as a major event of over 40,000 people which is representative of a 'peak event' in the precinct. These surveys collected the responses of over 10,000 people as to how they travelled to the match. The results of these travel surveys were utilised to inform the mode share assumptions for the existing stadium for the scenarios considered. 2. Mode share - proposed stadium Mode shares for the proposed stadium were determined primarily from the travel surveys undertaken at the existing SFS, however adjusted to consider the likely change in transport modes associated with future transport infrastructure. The key change in mode share (between existing and proposed stadium) is due to the introduction of the CBD and South East light rail line, which results in a shift from special event bus to light rail. Further, a small reduction in private vehicle usage was assumed due to the improvement in public transport accessibility to Moore Park. The mode share assumptions also reflect the various capacities of certain transport modes, for example: <ul style="list-style-type: none"> • Light rail has the capacity to accommodate up to 7,200 passengers per hour in one direction between Central Station and Moore Park, as well as a further 7,200 people per hour from Randwick/Kingsford. Therefore under a 'double header' scenario (95,000 people), the light rail mode share has been capped at 13.5% of total travel demand which equates to just under 12,000 people using light rail to access Moore Park. Transport surveys undertaken as part of this study noted that approximately 70% of people attending a match at the SFS arrive in the hour prior to the match commencing, therefore under this scenario approximately 9,000 people would arrive on light rail in an hour. This is in line with the capacity of light rail when considering arrivals from both directions (i.e. from Central and Randwick/Kingsford). • There are approximately 6,000 parking spaces in the Moore Park precinct. With an average occupancy of 2.75 people/car (derived from the travel surveys), just over 16,000 people can arrive by private vehicle. The mode share forecasts for peak events and concerts reflect this available capacity. <p>It must be noted that modal share for events is influenced by a wide range of factors, being predominately event size, but also including weather conditions, time and day of the event, other events occurring within the precinct, the type of sport, the teams participating etc. A key principle of the stadium redevelopment is to seek to influence travel behaviour to encourage increased utilisation of public transport, walking and cycling in order to reduce</p>
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No.	Issue Raised	Proponent's Response
		car reliance and traffic congestion, resulting in a decreased modal share for private cars over time.
	Connectivity and Access	
DPE16	The application proposes to increase the number of spectators/users that access the site using public transport or by pedestrian mode. Consequently, details of the proposed timing of works (by the Applicant or by others) required to accommodate the anticipated movement of the commuters / pedestrians from various transport nodes to the site, including connectivity through Moore Park, should be provided.	<p>The Applicant has committed to design and delivery of pathway connections to Tibby Cotter Bridge and the new light rail stop in consultation with Centennial Parklands and Moore Park Trust. This is included in the Final Mitigation Measures at Section 5 of the Response to Submissions Report (CP-TA6).</p> <p>The proposal would not result in any increase in the maximum capacity of the SFS (or any changes to the operation of the SCG). Whilst the number of events and patronage at these events may increase, there would not be an increase in the peak demand (i.e. the overall precinct capacity) required to be accommodated via existing pedestrian paths and other transport infrastructure. It is also noted that the Light Rail is anticipated to be complete by the time of opening of the SFS Redevelopment, thus changing the transport landscape for the precinct.</p>
	Pedestrian Vehicular conflict	
DPE17	The Urban Design Guideline Report (Page 52) identifies that currently there are multiple areas surrounding the stadium with pedestrian and vehicular conflicts (MP1 car park and Driver Avenue, Moore Park Road and Paddington Lane, Moore Park Road and Driver Avenue). The Urban Design Report should identify possible solutions to resolve these conflict areas in the future via design and also include a “do nothing” scenario.	<p>Page 52 of the Urban Design Guidelines outlines the existing potential safety considerations to be addressed in the Stage 2 Development Application. Solutions to these considerations are addressed in the guidelines at section 8 in relation to factors to be addressed in the final stadium design. The constraints identified at p52 of the Urban Design Guidelines do not possess a corollary action in order to mitigate. Rather a number of factors will be employed to mitigate the constraints of the existing situation. These factors include:</p> <ul style="list-style-type: none"> • Siting of the building further south and west on the site to increase pedestrian circulation external to the building; • Improved circulation areas within the building; • Operational considerations around the use of Paddington Lane and the servicing of the stadium during events; • Separation of back of house and front of house activities through the proposed basement ring road; • Ongoing closure of Driver Avenue during event mode to eliminate pedestrian and vehicle conflict; • Improved lighting and pathways within Moore Park to be developed in consultation with Centennial Park and Moore Park Trust, creating safer, more legible pedestrian routes to the site; and • Support for the proposed Bondi Junction- City cycleway being undertaken by TfNSW and City of Sydney that will improve active transport links to the site and be utilised for pedestrian movements during events at the precinct. <p>As such a do-nothing scenario is not applicable as such a scenario would need to be predicated on not undertaking the development (not contemplated by this EIS).</p>

No.	Issue Raised	Proponent's Response
		The management of the pedestrian/vehicle interface is a detailed design and stadium operations issue that will form part of the Stage 2 Development Application. The detailed design of the factors outlined above are considered the most appropriate way to resolve existing conflicts. The solution to these conflicts will be further explored with the stadium designer, public domain and landscape architect, relevant State and local government agencies and the Moore Park Working Group (where issues arise outside of the site boundary).
	Social and Economic Impact Assessment	
DPE18	The submitted Social and Economic Impact Statement has adapted the Social Impact Assessment Guideline (IAIA, 2015). However, the report combines risk and impact assessment and alters the overall risk levels from 'Low, Moderate, High and Extreme' to 'Very Low, Low, Moderate and High'. The adapted methodology of assessing the social impact is not strictly in accordance with the guidelines and does not identify all the relevant risks.	The guidelines in the DP&E comment referenced have informed, but not dictated, the methodological approach to the social impact assessment contained in the exhibited Social and Economic Impact Assessment. We note that DP&E do not have adopted guidelines for social impact assessment of urban development projects in NSW. Notwithstanding this, a Supplementary Social Impact Assessment is provided at Attachment 9 of the Response to Submissions which adopts and re-assesses the social impacts of the project using the IAIA risk assessment framework.
DPE19	Given the above, it is recommended that the Social and Economic Impact Assessment Report be amended in accordance with the guidelines and include the following: <ul style="list-style-type: none"> • identify all the likely social impacts including any pre-existing and ongoing operational adverse impacts, noise and visual impacts during demolition and construction works and impact of increased attendance on local community and Moore Park • identify the affected groups during demolition and construction works, including the users/occupiers of the surrounding properties • identify all social impacts and risks associated with the concept proposal and Stage 1 works • propose mitigation measures to reduce the identified risks in the social assessment. 	Refer to Supplementary Social Impact Assessment provided at Attachment 9 of the Response to Submissions.
	Air Quality Assessment	
DPE20	Given the amount of concrete to be crushed on site (100,000 tonnes of concrete) and the proximity to residential and commercial receptors, it is recommended that an assessment of the potential impact of the demolition works, in accordance with Approved Methods for the Modelling and Assessment of Air Pollutants, be undertaken, to demonstrate compliance with recognised air impact assessment criteria.	An Air Quality Assessment has been undertaken by Wilkinson Murray and is provided at Attachment 11 , which concludes that subject to the implementation of mitigation measures, the residual effects of dust from the project are expected to be not significant and to have a low risk of generating unacceptable air quality impacts. The implementation of these mitigation measures is included at Section 5.0 of the Response to Submissions (S1-CM1, S1-CM8/9)). The assessment methodology is based on a qualitative risk assessment approach, which is considered appropriate for short term construction activities as proposed in the Stage 1 works. However, the impact assessment criteria from the <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> has been used as the assessment criteria within the report. The approach adopted is consistent with that adopted for and accepted by DP&E and the EPA in the approval of the Western Sydney Stadium Stage 1 SSDA. We note that an Air Quality Assessment was not required in the SEARs issued for the Sydney Football Stadium redevelopment project.

No.	Issue Raised	Proponent's Response
	Noise and Vibration	
DPE21	The receivers that have been considered for the cumulative noise assessment in the Noise Assessment Report relate to NCA 3 and NCA 4 but Table 33 of the report indicates that NCA 5 could be impacted by crowd noise.	Results of the cumulative noise assessment at receiver R9 are presented in Section 4 of Attachment 6 of the Response to Submissions.
DPE22	Having regard to the above, it is considered that an assessment should also be conducted for R9 in NCA 5.	As per response above.
DPE23	The cumulative assessment should also be completed for maximum capacity events at both the proposed Sydney Football Ground and the Sydney Cricket Ground.	The conclusion of the cumulative assessment, which was to demonstrate that the contribution of the SCG event noise will be insignificant, holds under any capacity crowd in both venues. The outcome will not change based on a full capacity crowd at both venues. Refer to Attachment 6 of the Response to Submissions.
	Construction Management Plan (CMP)	
DPE24	It is unclear whether the location of the sediment basin in the Sediment and Erosion Control Plan, would require excavation, noting that the proposal does not seek approval for any excavation works on the site.	Demolition works will be completed to slab level only. No excavation is proposed as part of the Stage 1 works. A revised Sediment and Erosion Control Plan is included at Attachment 10 of this Response to Submissions.
DPE25	The Sediment and Erosion Control Plan needs to be amended to be specific to the demolition phase only.	A separate sediment and erosion control plan has been prepared for Stage 1 to illustrate the proposed arrangement. Refer to Attachment 10 of the Response to Submissions.
DPE26	The CMP must be amended to include clear and measurable environmental performance objectives for the demolition phase. Trigger, Action, Response criteria and processes should also be outlined for each relevant potential impact (e.g. dust leaving the site, stormwater flows from site entering Kippax Lake etc.).	<p>Section 11 of the Construction (Demolition) Management Plan provided at Appendix E of the EIS includes procedures for emergency and crisis management including environmental issues. The framework includes procedures for detecting an incident, addressing the incident and implementing responses for avoiding future incidents. Additional information regarding the Environmental Performance Objectives and the response and mitigation measures is included at Section 4.6 of the Response to Submissions.</p> <p>We note that a detailed Demolition and Environmental Management Plan will be prepared prior to the commencement of works. This commitment was included as a Mitigation Measure at Section 8.0 of the EIS. This is consistent with the conditions of approval for Western Sydney Stadium. To specifically address the matter raised by DP&E, the Mitigation Measure has been expanded in the Final Mitigation Measures included at Section 5.0 of the Response to Submissions to explicitly require that the DEMP addresses the matters identified as Environmental Performance Objectives and in the Construction (Demolition) Management Plan. Additional mitigation measures to enable monitoring and measuring of potential dust and noise impacts have also been included in the Final Mitigation Measures at Section 5.0</p>
DPE27	The CMP should include location of the intrusive plants, laydown area for the concrete crusher relative to the location of sensitive receivers including the Kira Child Care Centre.	Refer to site layout plan at Attachment 14 of the Response to Submissions.
	Attachment 2	

No.	Issue Raised	Proponent's Response
	Stakeholder and Public Engagement	
DPE28	Details of stakeholder consultations regarding aboriginal cultural heritage, and Civil Aviation Safety Authority (regarding highest level of any roof pylons) should be provided.	Refer to Section 3.0 of the Response to Submissions.
	Inconsistencies in documentation	
DPE29	The site boundary should be amended in the Urban Design Guidelines Report to be consistent with the EIS.	Refer to Section 4.2 of the Response to Submissions Report and final Urban Design Guidelines at Attachment 4 of the Response to Submissions.
DPE30	The Urban Design Guideline and all associated documents should be amended to include the stadium capacity of 45,000 (55,000 in concert mode) and be consistent with the EIS.	Text references to the stadium's capacity have been amended to reflect the stadium capacity of 45,000 (55,000 in concert mode) in the Final Urban Design Guidelines provide at Attachment 4 of the Response to Submissions. It is noted that this does not alter any other aspect of the urban design guidelines.
DPE31	The Noise Assessment Report assesses a 'half full' scenario with a 30,000 capacity. Table 8 of the TIA assesses a 'half full' scenario with a 22,500 capacity. The figures used in the two reports are inconsistent and should be amended, unless a specific reason is provided.	There is no inconsistency. The SEARs provided by DP&E (Point 6 - Transport) specifically requested the assessment of a "minor events (half capacity)" scenario in relation to transport. The Transport Impact Assessment at Appendix J of the exhibited EIS was accordingly prepared on this basis. No such requirement was included in the SEARs for the assessment of noise and vibration, and accordingly this assessment was based upon the two main operating modes for the proposed stadium, being 'Club mode' with 30,000 patrons, a full capacity stadium and concert-mode. The Noise and Vibration Impact Assessment at Appendix N of the exhibited EIS does not refer to the 30,000 pax scenario as being a 'half full' scenario.
DPE32	A capacity of 95,000 has been utilised for a double header event in the TIA. No explanation has been provided as to why a 95,000 capacity is used when the seating capacity is 45,000 and the standing capacity is 55,000 (90,000 - 100,000 in total).	<p>A 'double-header' is defined in both the EIS and the Appendix – Transport Impact Assessment (TIA) as being the operation of the SFS and SCG concurrently.</p> <p>The TIA has assumed a 'worst case' scenario whereby 50,000 people are in attendance at the SCG and a further 45,000 are present at the SFS. An analysis of double headers since 2010 has been conducted, with the results shown in the figure below. In the last 8 years there have been a total of 21 double headers, with an average (combined) attendance of 47,000 people. Since 2010, there have only been five double-header events where total attendance across the SFS and SCG has exceeded 50,000 patrons. Only one double-header event has exceeded 70,000 patrons, which was on 14 January 2017 with a combined attendance of close to 80,000 people.</p> <p>Therefore, in this context the analysis presented in the transport assessment for a double header (95,000 attendance) is considered appropriate.</p> <p>A double header event would not include a concert (i.e. 55,000 capacity at SFS), as these are not scheduled to coincide with sporting events at the SCG.</p>

No.	Issue Raised	Proponent's Response																																												
		<div><p>Attendance at 'double-header' events between 2010 and 2018</p><table><thead><tr><th>Double Header Date</th><th>Combined Attendance</th></tr></thead><tbody><tr><td>7/09/2010</td><td>42,000</td></tr><tr><td>22/05/2011</td><td>43,000</td></tr><tr><td>17/12/2012</td><td>26,000</td></tr><tr><td>19/04/2013</td><td>46,000</td></tr><tr><td>5/05/2013</td><td>34,000</td></tr><tr><td>12/03/2014</td><td>26,000</td></tr><tr><td>13/04/2014</td><td>41,000</td></tr><tr><td>19/04/2014</td><td>41,000</td></tr><tr><td>16/08/2014</td><td>51,000</td></tr><tr><td>28/03/2016</td><td>46,000</td></tr><tr><td>7/05/2016</td><td>44,000</td></tr><tr><td>27/05/2016</td><td>57,000</td></tr><tr><td>14/01/2017</td><td>80,000</td></tr><tr><td>7/05/2017</td><td>67,000</td></tr><tr><td>8/07/2017</td><td>43,000</td></tr><tr><td>9/09/2017</td><td>62,000</td></tr><tr><td>20/04/2018</td><td>48,000</td></tr><tr><td>19/05/2018</td><td>40,000</td></tr><tr><td>15/08/2018</td><td>47,000</td></tr><tr><td>4/09/2018</td><td>49,000</td></tr><tr><td>25/09/2018</td><td>53,000</td></tr></tbody></table></div>	Double Header Date	Combined Attendance	7/09/2010	42,000	22/05/2011	43,000	17/12/2012	26,000	19/04/2013	46,000	5/05/2013	34,000	12/03/2014	26,000	13/04/2014	41,000	19/04/2014	41,000	16/08/2014	51,000	28/03/2016	46,000	7/05/2016	44,000	27/05/2016	57,000	14/01/2017	80,000	7/05/2017	67,000	8/07/2017	43,000	9/09/2017	62,000	20/04/2018	48,000	19/05/2018	40,000	15/08/2018	47,000	4/09/2018	49,000	25/09/2018	53,000
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DPE33	<p>Please provide a clear description of:</p> <ol style="list-style-type: none">1. eSports and what these activities will involve2. activities that will take place in the proposed activation areas3. use of the activation areas on event days and non-event days4. whether the activation areas will also be serviced by operations within the stadium5. the maximum basement level that may need to be excavated inclusive of infrastructure and servicing to ascertain the impact on any relic of archaeological or aboriginal heritage significance6. the maximum height of any pylons that may exceed the “Loose Fit Envelop”7. the definition of the term ‘event’ identifying whether this includes a single event or a series of activities that occur over a day (it is recommended that the word ‘event days’ be used instead of ‘events’)8. whether additional basement level parking would increase the overall parking available on the site post construction.	<ol style="list-style-type: none">1. eSports are multiplayer video games undertaken by professional gamers. The existing SFS is home to the League of Legends eSports team as a headquarters. It is anticipated that the League of Legends will return to the SFS once redeveloped. No approval is sought for any spectator-based use of the stadium for eSports.2. An additional page has been included in the Final Urban Design Guidelines to provide more detail around the nature of activities and activation that will take place in the public domain. This will be subject to further detail in the Stage 2 Development Application. Refer to Section 4.2 of the Response to Submissions for additional information.3. As per point 2 above.4. Yes, however the servicing of all components of the stadium will be addressed in the Stage 2 Development Application.5. Excavation does not form part of the Stage 1 DA and will be addressed in a future application. Further detail regarding the level of excavation and the potential impacts and mitigations will be provided in this future application.6. All pylons would be included in the proposed building envelope.																																												

No.	Issue Raised	Proponent's Response
		<ol style="list-style-type: none"> 7. No limitation is proposed on the number of events as part of the Concept Application as set out in Section 5.1.6 of the EIS. In the indicative profile of events described in the EIS, the only multi-day event is the Rugby Sevens tournament which occurs over two days. 8. It is likely that the approximately 50 spaces provided within the stadium envelope would be offset by spaces lost during the reinstatement of the MP1 car park (predominately due to new access requirements through this area for service vehicles), and from vehicle parking that occurs around the existing stadium.
	Stormwater and Flooding	
	<p>The impacts of the Stage 1 early works on drainage, stormwater and flooding are required to be assessed and additional documentation submitted in this regard.</p>	<p>As described in Section 5 of the exhibited Arup Stormwater and Flooding Assessment report (Appendix P of the exhibited EIS), there are a number of existing stormwater pipes aligned through the site and existing overland flow routes draining water through the site around the stadium. The Stage 1 works will involve demolition of existing structures to slab level only and will not involve modifying the in-ground infrastructure or surface falls. For this reason, there will be no significant net changes to the behaviour of stormwater runoff and flooding associated with the Stage 1 works.</p> <p>An updated Erosion and Sediment Control Plan has been prepared by Arup to reflect the site layout plan, and is provided at Attachment 10 of the Response to Submissions. This plan has been prepared in accordance with the Landcom <i>Guide to Managing Urban Stormwater</i> (the Blue Book) which requires erosion and sediment control measures to be designed to accommodate the 10 year-ARI storm event.</p> <p>The only anticipated minor change is that once the existing stadium structure has been demolished, the existing field of play is likely to receive flows from a broader catchment effectively acting as an on-site detention basin prior to conveyance through the existing pitch drainage system. This is likely to provide enhanced containment of any local floodwater that would otherwise drain around the stadium thereby attenuating downstream flows. This is likely to offer a short-term reduction in flood risk to downstream areas.</p> <p>Similarly, an earthworks bund and hoarding line is proposed to the northern boundary with Moore Park Road is proposed as part of the stage 1 works. These features will tend to exclude flooding from Moore Park Road from flowing into the site. This is also likely to reduce flooding on the site or in areas immediately downstream of the stadium. Instead this water will flow in a westerly direction following the downhill gradient and flow into Driver Avenue in a slightly alternative manner to the existing conditions.</p> <p>An updated Erosion and Sediment Control Plan is provided at Attachment 10 of the Response to Submissions which provides additional detail as to how stormwater and water quality will be managed during Stage 1 works.</p>

No.	Issue Raised	Proponent's Response
	Groundwater	
	It is unclear whether the demolition works would impact on groundwater and the extent of such impact. Additional assessment focused on the proposed Stage 1 works should be provided.	Stage 1 works involve demolition of existing structures to slab level only. Because the slabs will remain in place and no in-ground works are proposed to affect the existing stormwater systems, there will be no change in infiltration or evapotranspiration behaviour. The groundwater mitigation measures contained in the Groundwater Assessment Report in relation to water pollution during construction have been added to the Final Mitigation Measures contained at Section 5.0 of the Response to Submissions as these are considered to be equally relevant to the demolition phase (S1-CM7). Consequently, no groundwater impacts are anticipated.
	Contamination	
	The information in the contamination assessment should be updated with data from the recently completed ground investigations.	Further contamination assessment will be submitted as part of the future detailed SSD Application. The information provided with the EIS satisfies the requirements of SEPP 55.