

4 April 2018

Ms Carolyn McNally
Secretary
NSW Department of Planning and Environment
320 Pitt Street, Sydney

Attention: David Gainsford (Executive Director, Key Sites Assessments)

Request for Secretary's Environmental Assessment Requirements – Concept Proposal and Demolition Sydney Football Stadium Redevelopment | 40-44 Driver Avenue, Moore Park

I write 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) to accompany a Development Application for a Concept Proposal and Detailed Stage 1 Early Works.

The Sydney Football Stadium Redevelopment is 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). The estimated CIV for the project is \$729 million (subject to tendering processes).

A staged application is proposed which includes:

- **Stage 1** – Concept Proposal for the stadium envelope and supporting retail and functional uses as well as development consent for the carrying out of early works comprising demolition of the existing facility and associated structures.
- **Stage 2** – detailed design, construction and operation of the stadium and supporting business, retail and functional uses.

This Request for SEARs relates to Stage 1 only, comprising the submission of a Concept Development Application incorporating detailed proposals for early works pursuant to Section 83B of the EP&A Act. A separate request for SEARs for Stage 2 will be made at the appropriate time.

1.0 Background and Project Justification

The Sydney Football Stadium (SFS) is a significant component of the sports facilities that comprise the Sydney Cricket and Sports 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 development of master plans for Tier 1 stadia and their precincts covering transport, integrated ticketing, spectator experience, facilities for players, media, 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 facilities, including suites, open-air corporate boxes and other function/dining facilities; and
- Be the home ground for sporting teams playing in national competitions.

Following release of the NSW Stadia Strategy, the Sydney Cricket and Sports Ground Trust (Trust) undertook master planning culminating in the 2015 Preliminary Sydney Cricket Ground Master Plan. This Master Plan defines the context for future redevelopment of the SCG, SFS and related sports infrastructure to ensure that the precinct continues to meet the needs and expectations of visitors and tenants into the future.

In a competitive rectangular stadium landscape nationally, the existing Sydney Football 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 hirers, operational efficiency, premium hospitality and food/beverage offerings and media requirements.

On 24 November 2017, the NSW Premier announced the SFS Redevelopment. 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. Redevelopment of the SFS will assist in supporting the realisation of the Master Plan principles to:

- Create a flexible venue suitable for sports, e-sports and major events alike;
- Include technology for the future;
- Create a venue for the growth of men's and women's elite sport, as well as the ability to adapt to new sports and the rise of e-sports;
- Create a publicly accessible entertainment and recreational facility;
- Create a stadium integrated with its surrounds including Centennial and Moore Parks and the surrounding residential and business areas; and
- Create a sustainable future.

The SFS Redevelopment will create a new stadium with up to 45,000 seats through a range of seating and facilities. The stadium will include state of the art technology with digital screens throughout to improve the fan experience. Sightlines will be improved and facilities including catering, public amenities and accessibility will be designed to service current and future needs, creating a world-class customer experience.

2.0 The Site

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

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 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 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 and approximately 2km from Central Station, 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.

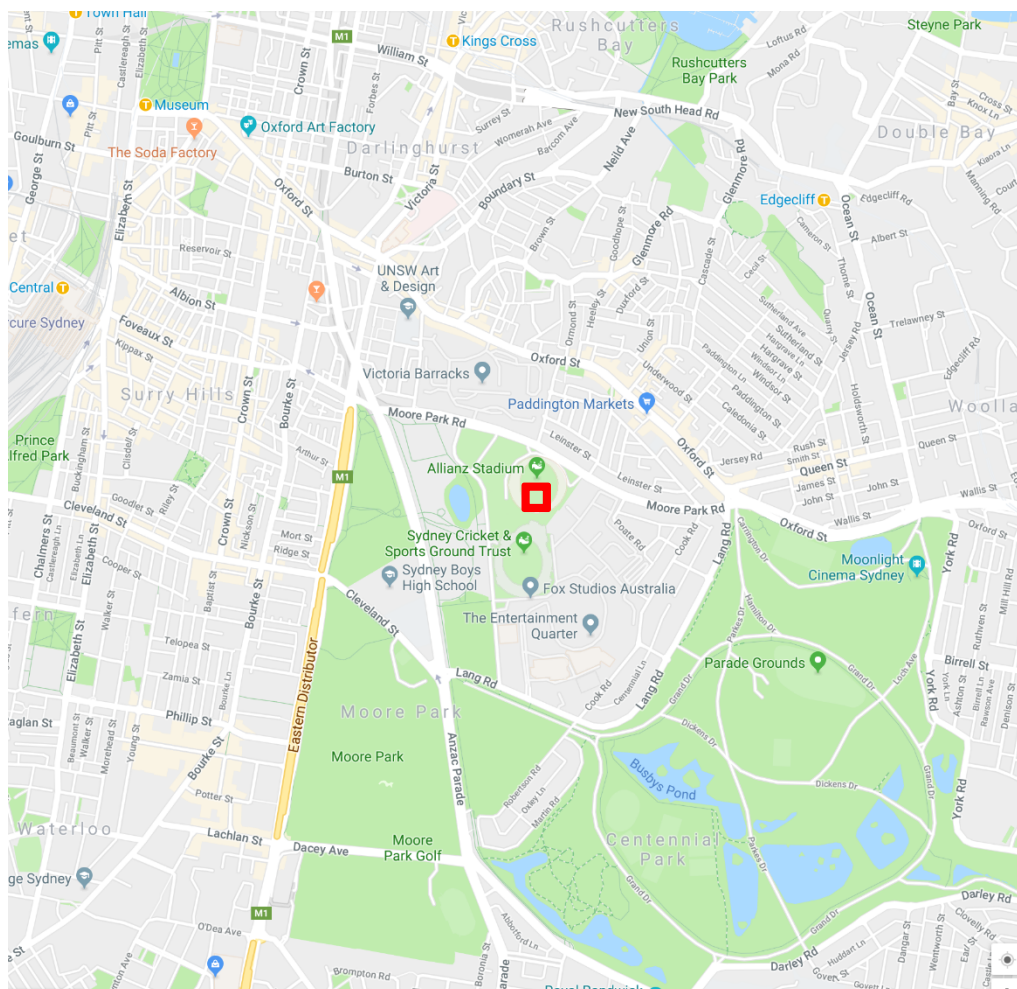


Figure 1 Location Plan

Source: Nearmap and Ethos Urban



Figure 2 Aerial Site Plan

Source: SJB

3.0 Development Description

The SFS Redevelopment Stage 1 application will include a Concept Proposal and Early Works package.

The Concept Proposal comprises:

- A stadium with up to 45,000 seats on the site of the existing stadium including:
 - New facilities for general admission
 - New playing pitch
 - Hospitality facilities
 - Ancillary food and beverage and entertainment facilities
- New basement with service vehicular access for servicing and bump-in/bump-out.
- New public domain works surrounding the stadium, building on the venue's unique parkland setting.
- Signage strategy.

An indicative building footprint prepared by SJB Urban Design outlining the extent of the proposed stadium building footprint and surrounding public domain to be included in the Stage 1 planning application is provided at **Attachment A**.

The Stage 1 Early Works comprises:

- Demolition of the existing stadium and the existing Sheridan, Roosters and Waratahs buildings and the administration building of Cricket NSW.
- Use of the existing MP1 car park for construction staging.
- Make good of the site suitable for construction of the new stadium (subject to separate Stage 2 application).

4.0 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*

4.1 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 83B of the EP&A Act a Staged DA may be made setting out concept proposals for the development of a site, and for which a detailed proposal or proposals for the site are to be the subject of subsequent DAs. This DA is for the Concept Proposal and early works (Stage 1) of the SFS Redevelopment.

4.2 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 Sport may approve the carrying out of improvements on designated land, including demolition and erection of a new building. Where the Minister for Sport grants approval under Section 16A, the EP&A Act does not apply to the carrying out of the approved improvements. In this instance, the Minister for Sport has determined that the SFS Redevelopment should be subject to assessment and approval by the Minister for Planning under the EP&A Act.

4.3 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.

The project is also 'staged development' for the purposes of Section 83B of the EP&A Act. State significant development applies to staged developments and as such the Stage 1 and 2 DA qualify as SSD and will be assessed under the relevant provisions under Part 4 of the EP&A Act.

4.4 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 consent in 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.

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 5,000m². In accordance with Section 83C of the EP&A Act, a Concept Development Application may satisfy this obligation to prepare a DCP.

5.0 Preliminary Key Issues Identification

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

5.1 Built form and public domain

The proposal will include redevelopment of the existing stadium and surrounding public domain. Urban Design and Public Domain Guidelines will be developed that provide a building envelope for the new stadium as well as suggested controls for the detailed design of the stadium. The Guidelines will explain land uses for which consent is being sought, gross floor areas and car parking locations.

The Guidelines will include suggested controls for the detailed design of the public domain including, hard and soft landscaping, accessibility (pedestrian, vehicular, bicycle and servicing), public art, lighting and adoption of Crime Prevention Through Environmental Design (CPTED) principles.

The Guidelines will explain the process by which design excellence will be achieved in the Stage 2 DA.

5.2 Views and Visual Impact

The maximum building envelope for the new stadium will be visible from a range of public and private places in proximity to the site. The EIS will be supported by a Visual Impact Assessment

5.3 Aboriginal and European Heritage

The site is located within a heritage conservation zone (Sydney LEP- Sydney Cricket Ground Conservation Area). The state heritage listed Sydney Cricket Ground Members Stand and Lady Members Stand is located to the south of the proposed development. Busby's Bore is a state heritage listed item that is located below the surface of the site along the northern boundary.

Surrounding the site, the Victoria Barracks is located to the north which is an item of local heritage significance under the Sydney LEP. In addition, the Paddington South Conservation Area is located to the north of the site.

The EIS will be supported by relevant assessments for Aboriginal Heritage as well as a Heritage Impact Statement.

5.4 Traffic, Transport and Access

The stadium is located approximately 3km from the Sydney CBD and approximately 2km from Central Station and has links to Sydney's transport network through buses and the soon to be completed Sydney CBD and South East Light Rail. Surveys will be undertaken of existing operations to determine mode splits for patrons and visitors, which will include qualitative assessment for the use of multiple modes to access the site.

Investigations will be undertaken in regard to the level of car parking required to service the development and any measures required to reduce reliance on private motor vehicles as the primary means of transport to the site.

An assessment of the early works (stadium demolition) will also be undertaken in regard to the impacts of these works on surrounding networks.

5.5 Biodiversity

Desk and field investigations will be undertaken to determine the presence of any threatened species or habitat on the site and its surrounds. A determination will be made in regard to the applicability of the Biodiversity Offset Scheme in consultation with Department of Planning and Environment and Office of Environment and Heritage.

5.6 Contamination

Investigations will be undertaken to determine the presence of any contaminated material on the site. The investigations will be undertaken in accordance with SEPP 55 and 'Managing Land Contamination – Planning Guidelines SEPP 55 Remediation of Land'.

5.7 Infrastructure and Servicing

Preliminary investigations have determined that there is sufficient capacity within existing services or the ability to augment existing services to meet the needs of the proposed development. Further consultation will be undertaken with service providers (water, waste water, electricity, gas and communications) and results will be included in an Infrastructure Management Plan. The Stage 1 application will be supported with appropriate stormwater and flooding assessments.

5.8 Social and Economic Impact

The SFS Redevelopment will create significant social and economic benefits for the city of Sydney and the State of NSW. An assessment will be undertaken of the social and economic impacts of the development, including its impact on the NSW visitor economy.

5.9 Noise and Vibration

Preliminary noise assessment will be undertaken to determine the likely noise sources from the proposed redevelopment. As the Stage 1 application will only seek approval for an envelope, further detailed noise assessment will be undertaken based on the detailed design of the stadium as part of the Stage 2 application.

The noise assessment will include impacts of the demolition of the existing stadium which will comprise an early works package within the Stage 1 application.

5.10 ESD

An Environmentally Sustainable Design Guideline will be prepared for the Stage 1 Application. This Guideline will outline the measures that could be incorporated into the detailed design of the stadium to achieve the targeted LEED Gold rating.

5.11 Construction

The Stage 1 application will seek approval for an early works package for the demolition of the existing stadium. A preliminary construction management plan will be developed to explain the duration of the demolition works and the likely impacts on the site and surrounds.

6.0 Expected Deliverables

The following documents would be expected to form the Stage 1 application:

- Environmental Impact Statement
- Site Survey
- Urban Design and Public Domain Guidelines
- View and Visual Impact Assessment
- Shadow diagrams of the proposed building envelope
- Traffic and Transport Assessment
- Heritage Assessment (Aboriginal and Non-Aboriginal)

- Arborist's Report
- Consultation Report
- Noise Assessment
- Biodiversity Assessment
- Contamination and Geotechnical Assessments
- Drainage and Flooding Assessment
- Infrastructure Management Plan
- Environmentally Sustainable Development Guideline
- Social and Economic Impact Assessment

The following documents would be expected to support the application for early works as part of the Stage 1 application:

- Preliminary construction management plan
- Construction Traffic, Transport and Pedestrian Management Plan
- Construction Noise Management Plan
- Construction Waste Management Plan

7.0 Consultation

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

- Department of Planning and Environment
- 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
- Centennial and Moore Park Trust
- Existing users of the stadium
- Sydney Cricket and Sports Ground Trust members
- Sydney Boys High School and Sydney Girls High School
- Surrounding residents and businesses

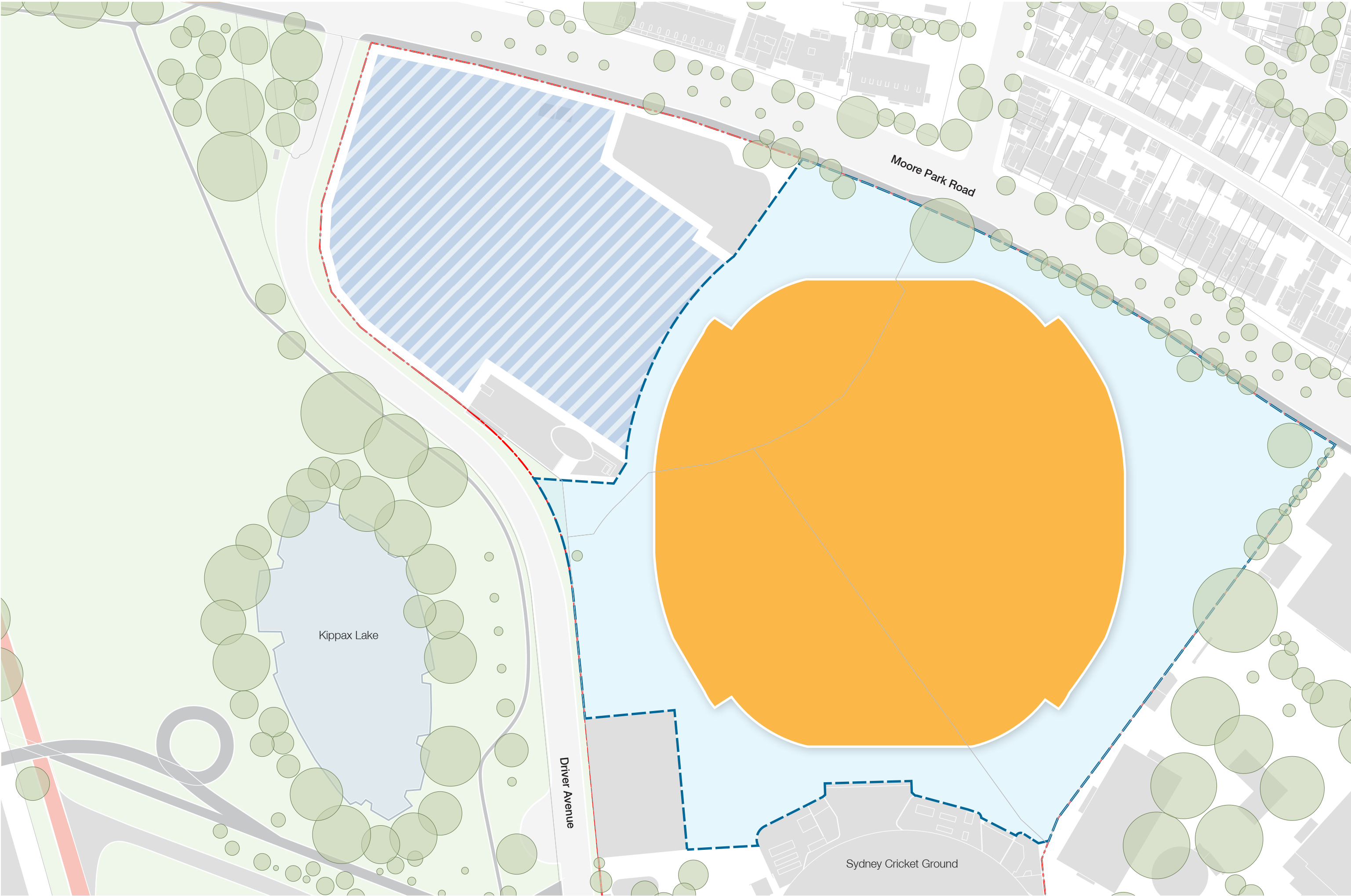
8.0 Conclusion

I 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 the proposed development.

Yours sincerely,

David Riches
Head, Projects NSW

Attachment A- Indicative Building Footprint



SEARs Plan

Scale
1:1500 @A3



Drawing number
SEARS01
Revision number
04

Project number
5812
Project name
Moore Park Stadium

Project address
Moore Park
Client
INSW

Key --- Property Boundary --- Site Boundary --- Construction Area

--- Stadium Envelope

SJB Architects
Level 2, 490 Crown Street, Surry Hills NSW 2010
T. 61 2 9380 9911 sjb.com.au
SJB Architecture (NSW) Pty Ltd
ABN 20 310 373 425 ACN 081 094 724
Adam Haddow 7188 John Pradel 7004

