



Infrastructure NSW

C/ - Mr Tom Kennedy  
GTK Consulting

Level 15  
167 Macquarie Street  
Sydney New South Wales 2000

25 July 2019

Dear Mr Kennedy

Sydney Football Stadium Stage 2 (Design, construction and operation) (SSD-9835)  
**Response to Submissions**

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 24 July 2019. All submissions received by the Department of Planning, Industry and Environment (the Department) during the exhibition of the proposal are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/10736>.

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 85A(2) of the Environmental Planning and Assessment Regulation 2000. Please note that the comments from the Department's Environment, Energy and Science Division and the Water Division, NSW Police Force and NSW Fire and Rescue are outstanding. The Department will provide you with a copy of their submissions when received.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in submissions, requires that the matters at **Attachments 1** and **2** be addressed in full. Please provide a response to the issues raised in the submissions and the attachments to this letter by 26 September 2019.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which your response to submissions is received by the Planning Secretary are not included in the deemed refusal period.

If you have any questions, please contact Aditi Coomar, who can be contacted on 8217 2097 or via email at [aditi.coomar@planning.nsw.gov.au](mailto:aditi.coomar@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in blue ink that reads 'David Gainsford'.

David Gainsford  
Executive Director  
Infrastructure Assessments  
Planning and Assessment

**as delegate for the Planning Secretary**

# ATTACHMENT 1

## KEY ISSUES

### 1. Number of events

- The Concept Proposal (SSD-9249) provided a broad overview of the predicted number of events at the future stadium, based on information regarding peak number of events in previous years at the former Sydney Football Stadium (SFS). The traffic impact, noise impact and social impact assessment for the Concept Proposal were based on an approximate estimate of events anticipated at the SFS venue in the future (being 52 per year).
- Based on the above, Condition C9 of Schedule 2 of the development consent for SSD-9249 (Concept Proposal and Stage 1 works) required that the Stage 2 development application estimate the number of events expected at the venue in the future and identify / assess all impacts of additional events and concerts in excess of 52 events per year.
- The Department notes that the SSD application for the design, construction and operation of the Sydney Football Stadium (Stage 2 application) seeks approval for no upper limits to the number of events at the future stadium. While the Stage 2 application broadly defines an event, no assessment of the additional environmental impacts due to the increased frequency of events in excess of 52, have been provided.
- The mitigation measure D/O-O1 does not acknowledge the upper limit or other existing parameters regarding to the number of concerts each year. The mitigation measure should be updated to confirm that existing requirements regarding concerts are proposed to be maintained as part of the Stage 2 application.
- The Department considers that the scenario for “no event limits” has not been assessed within the scope of assessment of the Concept Proposal. Consequently, additional assessment of all environmental impacts, including (but not limited to), the following should be conducted to support the proposal:
  - a. social and economic impacts on the surrounding residents and the wider region.
  - b. impacts on the built environment of the locality including (but not limited to) traffic and noise.
  - c. impacts on the natural environment of the locality including (but not limited to) bio-diversity.
  - d. impacts on the environmental amenity of the surrounding residents and occupiers / users of other existing land uses.
- Following the above additional assessments, the Stage 2 application should include additional management and mitigation measures (including updating the mitigation measures D/O-O1 to confirm), to reduce identified additional environmental impacts.

### 2. Clarification regarding definition of events

- The Environmental Impact Statement (EIS) for Stage 2 indicates that “events” at the future SFS venue would include sporting events, music concerts and any other entertainment event that is not a sporting match or music concert.
- Please clarify the “other entertainment events” that are anticipated within the venue and any associated impact on the natural and built environment of the locality due to such events. Parameters for this category of events would also be needed for further assessment of impacts.

### 3. Transport and Accessibility

- The Department notes that the drop-off / pick-up areas for patrons with limited accessibility have been proposed within the Moore Park 1 car park (MP 1 car park). However, no direct link is proposed between this area and the at-grade access that is proposed from Moore Park Road.
- The submitted linkage plans show that access from MP1 car park is proposed to the lifts at Driver Avenue. This may not be adequate on an event day, when large numbers of patrons would be dropped off at the MP1 car park.
- Given the above, alternate access to the Moore Park Road entry from the drop-off / pick-up area should be provided.
- Section 6.2.1 of the Event Management Strategy notes that under certain circumstances a “Temporary partial or full closure of Moore Park Road” may be required. This scenario has not been assessed in the Transport Assessment.
- Further information should be provided regarding the likely frequency of this scenario, and the likely impacts of this scenario on access to the surrounding residential areas.
- The EIS estimates that 600 construction workers would be employed during the Stage 2 works. In this regard, please provide details of parking provisions for the construction workers within or in close proximity to the site.
- Alternative mode share for the construction workers and any associated mitigation measures (such as provision of shuttle bus facilities from public transport hubs) should be detailed to ensure that the construction workers parking do not result in adverse impacts on the available parking on surrounding local streets.

### 4. Wind Impact Assessment

- The submitted “Wind Assessment Report” concludes that wind conditions are expected to be similar to the former SFS conditions with some areas ‘becoming windier and others calmer’. The wind tunnel testing report states that the wind conditions in most of the public domain areas around the stadium exceed the walking criterion (except certain locations to the north and south).
- The EIS does not include any measures to mitigate the exceedances noted in the Wind Impact Assessment Report.
- Please update the submitted schedule of environmental mitigation measures to include appropriate measures that would be implemented on the site to ensure that wind tunnel impacts are reduced in the public domain areas, which are likely to be used on the non-event days as well.

### 5. Visual Impact Assessment

- The Visual Impact Assessment Report (VIA) includes a method for assessing visual impacts of the future development and the criteria for assessment. The methodology identifies six criteria for assessment.
- However, the criteria have not been used in the tables that provide assessment of the visual impact of the proposed development on each selected view location (for public views).
- The VIA does not include a discussion regarding the landscape / spatial context of the site including: heritage; landscape character; landmarks; zonings etc. It also does not include the definitions for the terminology such as. ‘degree of impact’ or ‘visual sensitivity’.
- The view impact assessment tables should be amended to include the same terminology (method and criteria) as included in the “Methodology” section to enable a clear assessment against the identified criteria.

- The view impact assessment for each selected view location should also clearly describe how the identified methodology for the view assessment is used to estimate / assess the view impacts at each location.
- All terminologies in the VIA should be clearly defined.

## 6. Social Impact Assessment

- The Social Impact Assessment Report should be updated to:
  - a. identify and assess “*the social and economic impacts of the development, including impacts the stadium will have on the Sydney Central Business District and the local region, including tourism, retail, entertainment and night-time economies*” (as required by the Planning Secretary’s Environmental Assessment (SEARs) No. 18).
  - b. identify the impacts of increased number of events, in excess of 52, on the community in the surrounding locality. This may include (but not be limited to) impacts due to increased anti-social behaviour, additional noise generation, unavailability of on-street car spaces, access constraints to surrounding residential areas and unavailability of parklands.
  - c. include a brief assessment of the baseline condition of how people have experienced noise historically, and then assess how the redeveloped stadium will change this experience of noise for people, particularly in relation to the frequency of the events and the subsequent noise generation, which is not identified in the Noise Impact Assessment Report.
  - d. identify and assess the potential impacts of pedestrian patrons accessing the stadium to and from Central Station, for residents and businesses around Devonshire Street, especially in the post-event scenario.
  - e. identify how the project might affect livelihoods (employment and local economy) of people in the area, particularly in the light of the recent impacts of Sydney Light Rail construction.
  - f. integrate the outcomes of the research conducted regarding anti-social behaviour into the social impact assessment, and where necessary reassess the social impacts of anti-social behaviour to ensure that:
    - they are directly informed by community experience and sentiment.
    - mitigation measures respond directly to predicted impacts.
- The feedback from the Community Consultative Committee and other engagements with stakeholders during the Stage 1 and the Stage 2 applications, should be included to inform the updated assessment of social impacts.

## 7. Ecologically Sustainable Development (ESD)

- Appendix M of the EIS for the Stage 2 application (Environmentally Sustainable Design Strategy and Life Cycle Assessment) includes a design Life Cycle Assessment (LCA) report for the project. However, the analysis that is presented is high level, and uses global warming potential (GWP) as a proxy for all impacts rather than assessing the full range of potential environmental impacts (e.g. resource use, water consumption, land occupation, acidification).
- The LCA report highlights high level mitigation strategies that are generic, rather than identifying clear climate risks and opportunities for adaption and management.
- There are several examples of material replacements that are proposed to reduce the lifecycle material impacts. However, the LCA report identifies that operational energy is the largest contributor to GWP impacts but no proposals to reduce operational energy are discussed in the LCA report.
- The Department considers that the ESD report should identify the climate risks in more detail and then propose specific mitigation measures.

- The LCA report should also include all opportunities for impact reduction, including construction and operational energy, waste and construction materials.
- The reference to “housing” under the Intergenerational Equity assessment, should be deleted as it is not relevant to this proposal.

#### 8. Public access

- As required by SEARs No. 5, the Stage 2 application needs to include a more detailed assessment to demonstrate that effective pedestrian circulation for day to day activities will be achieved on event days when public access to the site will be allowed in addition to patrons. This assessment should be supported by details of way finding, crowd control and movement. Currently, the application does not include details of the crowd management / swell plans.
- The indicative location of access Gates in Figure 51 of Landscape and Public Domain Plan is not consistent with the comment in the Environmental Wind Assessment (Appendix Z), which states that “...for the majority of the year the precinct has limited use, with a large proportion inaccessible by the public...”. You are requested to clarify this statement.
- Please clarify how the potential security issues, in relation to public access within the eastern side of the stadium on all days, would be mitigated (refer to Figure 50 of the EIS, which shows that this section would include a ‘dead end’).
- The response to condition B10 of Schedule 2 of the development consent for SSD-9249 does not fully identify the potential impacts of increasing permeability between the site and Fox Studios / Entertainment Quarter. The strategy is not consistent with the responses provided in Appendices G and C of the EIS and therefore it is not clear whether the access point at the south-eastern corner of the site would be opened after completion of the Stage 2 works. Please clarify this and address all additional impacts (social and noise), in case access to the adjoining sites is proposed.

## ATTACHMENT 2

### OTHER MATTERS

#### 1. Green Travel Plan

- The following initiative should be considered as part of the Green Travel Plan to ensure a sustainable operational approach:
  - a. Improved accessibility for additional buses to cater for high volume in short periods.
  - b. Creating a multi-use precinct to offer additional post-match entertainment options thereby spreading the leaving times for patrons.
  - c. Designated drive-through areas for Uber / equivalent offering car-pool rides only.
  - d. More detailed discussion of the Sydney Light Rail network and its integration with the stadium's Green Travel Plan.

#### 2. Aboriginal cultural heritage assessment report (ACHAR)

- The ACHAR submitted with the EIS for the Stage 2 application should be updated to be consistent with the mitigation measures proposed under the SSD-9249-Mod-2 (as refined by the response to submissions dated July 2019). The amendments should include (but not be limited to):
  - a. detailed justification for not conducting test excavation.
  - b. details regarding depth of test excavation.
  - c. additional details of methodology for hand and mechanical excavation.
  - d. confirmation that a sensitive archaeological feature would be explored to its full extent, not to the extent of the development impact zone only.
  - e. confirmation that the sensitive archaeological feature would be fully recorded, notwithstanding whether partial or full impact is expected.
  - f. confirmation that significant feature excavation or a salvage excavation within a test unit would be undertaken to the depth of the culturally sterile soil.
  - g. commitments to submit a post-excavation report including the following information:
    - where the development works are going to occur
    - the basis on which the natural soil profile was identified in these areas
    - on what basis was testing not undertaken if this is the decision and what other options were explored to test.
  - h. additional details regarding the unexpected finds procedure including confirmation that the protocol would comprise the removal of displaced Aboriginal objects within historical archaeological deposits.

#### 3. Water Management Plan

- SEARS requirement No. 24 requires the submission of an Integrated Water Management Plan. Please clarify whether this information has been submitted.

#### 4. Contamination

- The Site Auditor's Report should include an additional conclusion to confirm that the site is suitable for the future use, in accordance with condition C24 of Schedule 2 of SSD-9249.

5. State Environmental Planning Policy No. 64 (SEPP 64)

- The submitted SEPP 64 assessment does not include details of curfew hours on the illuminated signage.
- This information is required to ensure that the night time illumination of the signs do not have any adverse impacts on the nearby residential properties.

6. Water sensitive urban design

- Water sensitive urban design and energy conservation and efficiency measures, including sizing of key elements (SEARs No.14) are not clearly provided in the ESD report. A detailed assessment and associated recommendations in this regard are necessary.
- The proposed mitigation measure D/O-ESD2 does not include any recommendations regarding energy or water and hence does not meet the requirement of the SEARs.

7. Flood evacuation

- The Stage 2 application does not include measures to demonstrate that patrons can safely evacuate the site in the event of a large flood.
- Given that the proposed stormwater management plans do not propose any improvements to the existing flooding situation surrounding the site, the above evacuation measures should be provided.

8. Noise Assessment

- Noise assessment report should be updated to address the impacts of activities outside of the stadium structure that may generate noise (portable sound systems for crowd engagement).
- The Mitigation measures table should be updated to include the recommendations regarding acoustic screening of the louvres to the plant and equipment.
- The Noise Assessment Report should be updated to include an assessment of the impacts of wind noise and any potential mitigation measures.
- The Noise Report does not include a consistent definition for a “sensitive receiver”, when assessing event noise.
- The draft Noise Management Plan should be amended to comply with all requirements of condition C20 of Schedule 2 of SSD-9249, in particular:
  - a. providing additional information to satisfy (a) and (b) relating to event numbers and Event Acoustic Report requirements.
  - b. providing additional information to satisfy each of the requirements of (e).

9. Design Integrity Assessment

- The Design Integrity Assessment Report (DIA) notes that ‘extension to landscaped terraces’ are proposed to improve landscaping areas within the building. However, this is not evident in the design and the DIA does not clearly outline the sections where such extensions are proposed. Please clarify this issue by providing additional diagrams / plans.
- The DIA also specifies that the roof height has been reduced by 1 – 2 metres. Please specify which sections of the roof height have been reduced.

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