

2 September 2019

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Appendix A – Response to State and Local Government Agency Submissions

The following report includes a response to the full text of submissions provided by or on behalf of State and local government agencies. For completeness, the full text of each submission is provided in the left-hand column, accompanied by the proponent's corresponding response in the right-hand column. The proponent's responses have been informed by input by the expert consultant team, and should be read in conjunction with the publicly exhibited Environmental Impact Statement and accompanying technical reports, as well as the Response to Submissions Report to which this document is appended.

CONTENTS

1.0	State and Local Government Agencies	2
1.1	Department of Planning, Infrastructure and Environment	2
1.2	City of Sydney Council	16
1.3	Waverley Council	30
1.4	Randwick City Council	32
1.5	Former Office of Environment and Heritage	35
1.6	Heritage Community Engagement, Department of Premier and Cabinet (Heritage Council of NSW)	35
1.7	Transport for NSW	37
1.8	Botanic Gardens and Centennial Parklands (Centennial Park and Moore Park Trust)	42
1.9	NSW Environment Protection Authority	50
1.10	Sydney Water	56
1.11	Civil Aviation Safety Authority	57
1.12	Sydney Airport Corporation Limited	57
1.13	Transgrid	58
1.14	Ausgrid	58
1.15	Department of Defence (Commonwealth)	59
1.16	NSW Police Force	59
1.17	Fire and Rescue NSW	59
1.18	Department of Planning, Industry and Environment Water – Strategic Relations (Former Department of Industry – Land and Water)	61

1.0 State and Local Government Agencies

1.1 Department of Planning, Infrastructure and Environment

No.	Extract	Recommended Response
DPIE1	<p>Number of events</p> <ul style="list-style-type: none"> 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. 	<p>The Stage 2 SSD DA seeks to retain the operating parameters of the former stadium and does not propose an event limit for the new stadium. On this basis, the EIS did not specify the number of events to be hosted on the site, with the exception of concerts, which are proposed to be limited to a maximum of 6 per year and an average of 4 per year over a rolling 5-year period. The EIS assessed the possible impacts resulting from events, including the worst-case scenario of a sold-out concurrent event at the SCG and SFS.</p> <p>An estimate of the number of events cannot be committed to due to the manner in which events are procured and scheduled for stadia of the type proposed. Whilst the Concept DA and Business Case Summary predicted that the stadium might host in the order of 49-52 events per year, this was an average based on the operation of the former stadium and a 'typical' average event program incorporating a profile of known and regular domestic and international fixtures, and importantly was not a specific minimum or maximum. It also recognises that the number of events to be hosted at the stadium will vary from season-to-season and year-to-year, having regard to external factors such as international sporting affiliation requirements, team and talent agents, programming of events scheduled across other NSW and Australia stadia amongst other considerations.</p> <p>Consistent with the NSW Stadia Strategy, the NSW Government and the stadium's operators will seek to host international sporting matches and tournaments and special events over the course of the stadium's lifespan, which may result in hosting less than or greater than the identified 52 events per year. The stadium's operating basis should therefore be sufficiently flexible and adaptable to be able to quickly attract and accommodate the scheduling of international fixtures and the qualification of Sydney and NSW-based sports teams for finals or international tournaments. The NSW Stadia Strategy seeks to establish Tier 1 stadia as the premier venues for sport in NSW and Australia, capable of retaining and attracting new major events to boost the social and economic benefits of major national and international events to the people of NSW. International matches, tournaments and special events represent the greatest potential change in the 'base' event calendar of typical Rugby League, Rugby Union, and Football season and international games. They include emerging sports such as a W-League, one-off other entertainment events such as fun-runs and community events, and major international tournaments such as the Rugby League World Cup and Nine's World Cup, Men's and Women's Rugby World Cup, and FIFA Women's World Cup, which the NSW Government has committed to bidding for over the next 10 years to attract \$1 billion in visitor expenditure to the NSW economy.</p> <p>All technical assessments prepared to support EIS and this Response to Submissions have assumed a no event cap, and all studies demonstrate that the project can be supported on social, economic and environmental grounds, subject to the implementation of the committed mitigation measures specified within the EIS and this Response to Submissions. Precluding the stadium from hosting any number of sporting fixtures and events that would otherwise comply with the relevant environmental framework is therefore unfounded and contradictory to the project objective to deliver a modern, globally competitive stadium.</p>

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		<p>It is worth emphasising that the 'additional' events the Government is seeking to secure above the business-as-usual base-case (i.e.: various additional sporting code World Cups cited above) also represent the greatest potential generators of positive social and economic impacts. They will not result in any additional environmental impacts beyond the 'worst-case scenario' of a concurrent sold-out event at the SCG and SFS, which the EIS and this Response to Submissions has demonstrated is acceptable.</p> <p>The imposition of a restriction on the number of events that may be hosted would also be inconsistent with the <i>NSW Stadia Strategy</i> which has informed the NSW Government's investment decision for this project and compromise the ability of the stadium to support the <i>Shaping the Future of Women's Sport in NSW 2019-2023</i> strategy to grow women's sporting content.</p> <p>Mitigation Measure D/O-O1 which specifies that the maximum number of concerts hosted at the site is not to exceed 6 concerts per calendar year. As part of the Response to Submissions, Mitigation Measure D/O-O1 has been revised to make clear that this also incorporates the requirement that the number of concerts does not exceed an average of 4 per year over a rolling 5-year average. This is consistent with the operation of the former stadium and Condition C9 of the Concept Proposal, and is consequently considered a reasonable approach to also apply to the operation of the new stadium. The proposed development does not seek to change this existing cap on the number of concerts, rather it seeks to enable the competitive operation of the stadium to host sporting and other events.</p>
DPIE2	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	<p>The impacts of hosting events on the site, including maximum-capacity double header events at the SFS and SCG, has been assessed in the technical reports accompanying the EIS and this Response to Submissions. The assessment demonstrates that the proposed stadium can operate without generating unacceptable or adverse environmental impacts, subject to the implementation of the committed mitigation measures specified within the EIS and this Response to Submissions. No assessment recommends or requires a cap on the number of events to limit or reduce any identified unacceptable or adverse environmental impacts. Accordingly, understanding that the impact from this worst-case scenario is acceptable, the impact from events within or outside of the 52 event cap would also remain acceptable. Precluding the stadium from hosting sporting fixtures and events that would otherwise comply with the relevant environmental framework is unfounded and contrary to the project objective to deliver a globally competitive stadium as discussed above.</p> <p>The following supports this proposal:</p> <ul style="list-style-type: none"> An addendum Social and Economic Impact response to the request for additional information is provided at Appendix M. This addresses the impact of events hosted at the stadia including the implications for limiting the number of events that may be hosted at the stadium. The assessment concludes that the social and economic impacts associated with the proposed development are expected to be the same or less than those identified in the previous Stage 1 Social and Economic Impact Assessment prepared by Ethos Urban dated June 2018, the Addendum Social Impact Assessment prepared by Ethos Urban dated 13 September 2018, the further Stage 2 Addendum Social and Economic Impact Assessment prepared by Ethos Urban dated 30 May 2019, and the Stage 2 Environmental Impact Assessment prepared by Ethos Urban dated 12 June 2018. The assessment also identifies social and economic impacts associated with the potential to host more than 52 events on the site, which include significant positive impacts.

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		<ul style="list-style-type: none"> The noise and traffic assessments have addressed a range of worst-case scenarios including a full capacity stadium and SCG (double-header). These assessments confirmed that the proposed stadium would operate without adversely impacting the surrounding area. The frequency of events does not impact these assessments, as such events would not increase the maximum capacity or operating procedures for the stadium. All events will be governed by the Event Management Plan, Noise Management Plan, Anti-Social Behaviour Strategy, and restrictions on the hours of operations, which have been shown to result in an acceptable outcome. Biodiversity effects of the stadium have been assessed at Concept DA and through the BDAR waiver for Stage 2. The supplementary assessment by Jacobs confirms there will be no adverse impact as a result of noise and light from events including any long-term impacts on Grey-Headed Flying Foxes, water birds, and other fauna around Kippax Lake. <p>The final Mitigation Measures are included at Section 5 of the Response to Submissions and Amended Proposal report.</p>
DPIE3	Clarification regarding the definition of events <ul style="list-style-type: none"> 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. 	<p>‘Other events’ are defined as those events not involving sports matches or concerts such as e-sports or the Edinburgh Military Tattoo as the focus of entertainment. In this instance, the parameters for this category of event are the same as other events including the noise criteria, operating hours, and security and management procedures. The level of impact would be the same as or lesser than sporting events and music concerts.</p>
DPIE4	Transport and Accessibility <ul style="list-style-type: none"> 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. 	<p>As confirmed in the memorandum by Arup (Appendix I) the two lifts provided are capable of accommodating the anticipated number of lift passengers prior to or after an event.</p> <p>In the unlikely event that both lifts are unable to operate, equitable access is facilitated via the entrances from Moore Park Road. In this regard, information on the best path of travel for persons with mobility impairments would be available on the SFS website to assist in travel planning prior to an event. Variable wayfinding signage or staff within the site would also be able to assist in travel planning for those already on site, and will be further complemented by the Wayfinding and Signage Strategy which is to be prepared post approval as agreed with TfSNW.</p>
DPIE5	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> During the operation of the previous stadium, temporary partial or full road closures were implemented on Moore Park Road immediately following the conclusion of certain events. These road closures were put in place by the NSW Police at its discretion to manage pedestrian safety during the peak stadium egress phase, particularly at the intersection of Moore Park Road and Regent Street. Short-term road closures are expected to continue to be implemented by the NSW Police once the new stadium is operational on an as-needs basis. The proposed new stadium will be located southwest of the previous stadium to create more space around the Moore Park Road entry point and provide a plaza experience. This will significantly improve pedestrian safety and efficiency at the Moore Park Road / Regent Street intersection by creating additional space for pedestrians to store and wait within the site boundary.

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		<p>This will likely reduce the instances where a temporary road closure on Moore Park Road will need to be implemented compared to the previous arrangements</p> <ul style="list-style-type: none"> Infrastructure NSW is unable to specify the frequency of temporary road closures as NSW Police is the relevant authority responsible for road closures. However, road closures typically only take place for a short period of time (less than 30 minutes) following the conclusion of major events and generally occur outside of peak traffic periods. Residents and other road users are provided advanced warning and notified of appropriate detour routes. The impacts on the transport network are, therefore, minimal. The Event Management Plan at Appendix Q of the EIS is an operational document that will need to be updated post-consent and prior to occupation. The Mitigation Measures have been updated to reflect the intention to update the Event Management Plan to consider road closures (see D/O-O3). A suitably worded condition could further reinforce this commitment.
DPIE6	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> On-site parking is not proposed to be provided to construction workers. This approach is consistent with the strategy adopted for most major construction projects across the city. Approximately 2,000 carparking spaces are available in the adjacent Entertainment Quarter carpark which can be used by construction workers on a daily basis. This carpark is only ever at capacity during major events held at the SCG. Construction is not scheduled during major events and accordingly there is unlikely to be a conflict between different car park users. The significant majority of parking spaces in nearby residential streets are subject to resident parking schemes, where parking is not permitted by visitors for periods of more than two hours. Given staff will be on-site for periods of more than two hours, on-street parking in these residential streets is not considered an attractive or feasible option for construction workers. If issues arise during the construction phase, this is able to be readily reported and enforced through the normal processes for management of on-street parking by Council where resident parking schemes and time restrictions apply. During site induction, workers will be informed of the existing bus and train networks servicing the site or nearby off-street parking areas such as the Entertainment Quarter, and will be encouraged to use the available services and facilities. To support construction workers in utilising public transport, appropriate arrangements will be made for any equipment/ tool storage and drop-off requirements.

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DPIE7	<p>Wind Impact Assessment</p> <ul style="list-style-type: none"> 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 	<p>Arup has prepared an Addendum Wind Data Analysis to further assessment the anticipated wind conditions and practical implications of the outcomes of the Environmental Wind Assessment submitted as Appendix Z of the EIS. The Addendum assesses the development against the new criteria contained in Council's Draft Central Sydney Planning Strategy and confirms that all locations are expected to meet the walking criterion in this instance, with some locations also meeting the pedestrian standing criterion. Arup confirms that Council's new criteria are considered to be more appropriate for measuring pedestrian comfort than the current criteria contained in the Sydney DCP 2012, which utilises once per annum gusts (i.e. the extreme wind event in a year) rather than typical wind conditions. The 2016 draft criteria removes the assumed extrapolation from the extreme 'once per annum' event to more regular events.</p> <p>The Addendum Wind Data Analysis also further analysed the impact of introducing mitigation measures to assess the degree of improvement and, therefore, the appropriateness and practicality of implementing such measures. It introduced mature trees at Locations 26 and 10 and measured the impact, confirming that these trees did not significantly improve the wind environment in these locations, which are already capable of meeting the pedestrian walking criteria. Further, the introduction of trees in these locations would pedestrian circulation, operational activities for the SCG, and sightlines within the public concourse surrounding the stadium, thereby, negatively impacting movement and safety within the site. Arup confirms that no Mitigation Measures are required or warranted in this instance.</p>
DPIE8	<p>Visual Impact Assessment</p> <ul style="list-style-type: none"> 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. 	<p>The VVIA has been revised at Appendix L to address the issues raised by the Department.</p> <ul style="list-style-type: none"> Consistent with the visual impact assessment methodology for public views, the criteria noted are relevant to the assessment of the visual impact of the proposal (taking into consideration the visual effect along with project criteria), whereas the tables referred to relate to visual effect. For clarity, the methodology has been more clearly explained in Section 6 of the Updated Visual and View Impact Assessment to explain the sequential process of assessment applied. In addition, view-specific assessment of visual impact has been included in Section 10.1 which demonstrates the line-of-sight within the assessment between specific views and the established criteria for determining the visual impact. This information was included in the Concept Proposal VIA, and remains the same for the current assessment. This information has been included in the Updated Visual and View Impact Assessment at Sections 7 and 8. Definitions of these terms have been included in in Section 2 of the Updated Visual and View Impact Assessment. As per response above, the visual effect tables for specific public views are not the same as the assessment of visual impact. For clarity, the methodology has been more clearly explained in Section 6 of the Updated Visual and View Impact Assessment to explain the sequential process of assessment applied. In addition, view-specific assessment of visual impact has been included in Section 10.1 which demonstrates the line-of-sight within the assessment between specific views and the established criteria for determining the visual impact. The view assessment methodology is consistent with the approach outlined by former Senior Commissioner Roseth in <i>Tenacity Consulting v Warringah Council</i> [2004] NSWLEC 140, which is the widely accepted and applied methodology for private view impact assessment in NSW. The process was stepped out in Section 8.1 of the exhibited Visual and View Impact Assessment (now

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		<p>Section 11.1 of updated report). The exhibited report included a clear description of the assessment process using <i>Tenacity</i> Steps 1-4 for each selected view location..</p> <p>It is also noted that the updated VVIA does not include updated photomontages of the stadium design, which is appropriate given the changes to the stadium structure described in the RTS Report are overall considered to be minor and would result in a lesser visual impact. Namely, the proposed changes include reducing the height and scale of the stadium, minor changes to the roof detailing while retaining the overall same finish and aesthetic, and adopting more earthy-toned materials and finishes in the facade and stadium base. Landscaping and other detailed design measures were not captured in the original photomontages and as such any changes to the public domain as described also won't impact these photomontages.</p>
DPIE9	<p>Social Impact Assessment</p> <ul style="list-style-type: none"> The Social Impact Assessment Report should be updated to: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	<p>A Social and Economic Impact Assessment in response to this request for additional information has been prepared by Ethos Urban and included at Appendix M, detailing each of these points. The additional assessment finds that the social and economic effects of the development are expected to be the same or less than those previously identified, and notes the following:</p> <ul style="list-style-type: none"> The addendum reconfirms the findings of the Stage 1 Social and Economic Impact Assessment and the associated addendum assessment submitted at Stage 1 and exhibited with the Stage 2 EIS. These conclude that the negative impacts on the local region were primarily associated with the demolition and construction of the stadium including potential amenity impacts and inconveniences from with the relocation of events, restricted access to the site and carpark, and the risk of impacting heritage items. These negative impacts were, however, identified as being temporary and would subside when the construction phase of the project was completed. The identified negative impacts did not extend to tourism, retail, entertainment and night-time economies, which were all identified as benefitting from the proposed development over the long-term. The addendum confirms that understanding that the impact from the worst-case event scenario is acceptable, the impact from events within or outside of the 52 event cap would also remain acceptable. The impacts associated with increasing the number of events above the assumed 52 event baseline were identified as being positive and included the growth and awareness of women's elite sport, the capacity to host other emerging sports and community events that would not otherwise be prioritised in a capped scenario, and increased economic benefits including for jobs growth, tourism, and spending. The addendum confirms that the Noise and Vibration Assessment finds that the proposed stadium is not expected to increase noise emission compared with the former SFS, and presents no additional or significant acoustic issues. This assessment is founded in both long-term and short-term noise monitoring to understand the prevailing ambient noise environment, which comprises traffic noise from Moore Park Road and Anzac Parade, the 'urban hum' of the CBD, aircraft noise, as well as activities from the use of existing facilities in the sporting and entertainment precinct. When considered historically, the broad influencing factors of this ambient noise environment would not have significantly changed. The addendum notes that whilst the stadium capacity has not increased from the former stadium, and as such peak travel impacts will remain generally unchanged, the migration of event patrons from the site to Central Station via Devonshire Street following the conclusion of an event would increase the foot-traffic above what is typically experienced in these areas, which could also occur

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		<p>more frequently depending on the frequency of events. The effect of this foot-traffic on residents and businesses would be relatively short lived, recognising that at the conclusion of events the majority of patrons will migrate from the stadium to key connections or other venues within the first 30 minutes to an hour. The effects of this additional foot-traffic would be positive in terms of increased demand/interest in local business and increased activity and passive surveillance, and negative in terms of potential anti-social behaviour. In this regard, the appropriate management of patrons attending the stadium ensures that when they leave the site there is a far reduced risk of incidences.</p> <ul style="list-style-type: none"> • The addendum finds that during the construction phase of the project, there is the potential for works on the site to generate impacts on surrounding businesses and, therefore, on employment and the immediate local economy. This included construction works resulting in temporary negative impacts on the amenity of businesses, and direct and indirect impacts on service and hospitality industries as a result of there being no active stadium on the site. These impacts were not considered to result in significant changes in employment and the local economy, and would not coincide with the construction of the Light Rail that will be primarily complete at the time construction works are underway on the site. The project will positively impact the livelihoods of people in the area once operational, including the creation of jobs, increased spending in hospitality, accommodation and entertainment, and increased foot-traffic and patronage for businesses in the local areas. • The addendum statement confirms that through consultation with NSW Police, the community and local stakeholders, the community concerns generally related to disorderly conducted linked to alcohol consumption. The Anti-Social Behaviour Strategy was developed collaboratively by Ethos Urban with SCSGT and NSW Police to help address these issues and mitigate community impacts. • The addendum Social and Economic Impact Assessment, accompanied by the Stage 1 assessments, were placed on public exhibition with the Stage 2 EIS at Appendix O of the EIS. The Anti-Social Behaviour Strategy at Appendix R of the EIS was also discussed with the CCC and other stakeholders including City of Sydney Council, the Sydney Coordination Office, Transport Management Centre, TfNSW, RMS, NSW Police, and the CPMP Trust prior to its lodgement. These assessments have been informed by consultation completed to date, and no change is required.
DPIE10	<p>Ecologically Sustainable Development (ESD)</p> <ul style="list-style-type: none"> • 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 	<p>LCI's exhibited ESD Report has identified a suite of climate change risks and adopted a set of standard mitigation measures, which reflects the project details available for the current planning and design status of the project.</p> <p>The type and degree of climate change risks that could be generated by the SFS Redevelopment will be informed by the selected materials, plant and equipment, as well as the construction and operational methodologies. These influencing factors are still in the process of being specified and will continue to be refined through design development, consistent with standard project delivery practices. Consequently, climate change risks will need to continue to be considered and evaluated as risk mitigation initiatives are implemented by the appointed construction contractor and sub-contractors.</p> <p>The SFS Redevelopment Stage 2 project is targeting the LEED v4 certified Gold rating and has committed to pursuing a 'Whole Building Life-Cycle Assessment' credit under this pathway. This</p>

No.	Extract	Recommended Response
	<p>report. The Department considers that the ESD report should identify the climate risks in more detail and then propose specific mitigation measures.</p> <ul style="list-style-type: none"> • 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. 	<p>approach requires a comparison of a minimum of three (of a total six) impact categories against a baseline building, being GWP, ozone, acidification of land and water resource, eutrophication, tropospheric ozone and depletion of non-renewable energy resources). The adoption of global GWP as a proxy for all impacts rather than assessing a wider range of potential environmental impacts is appropriate under these circumstances.</p> <p>Notwithstanding this, the exhibited ESD Report also directly addresses SEAR 16 - Design for Resilience to Climate Change (in addition to all other ESD related SEARs) by identifying the climate design initiatives established for the SFS Redevelopment to ensure the nominated climate change projections are appropriately addressed. The contractors tendering for the works are aware of the initiatives in the exhibited ESD Report and will be required to commercially deliver or exceed these initiatives. Through the design development phase, these initiatives can continue to be evaluated as reflected in Mitigation Measure D/O-ESD1 and D/O-ESD2.</p> <p>The exhibited LCA Report for the SFS Redevelopment Stage 2 project is a preliminary Life Cycle Analysis which reflects the planning and design phase that the project is currently in. Construction and operational contractors are yet to be appointed and consequently many of the mitigation measures that could be installed by the appointed contractor(s) are yet to be specified and are therefore unable to be confirmed (or modelled) at this stage. Infrastructure NSW is committed to completing this work, and accordingly the LCA will be undertaken during the detailed design stage once all contractors have been appointed and their inputs can be obtained. The Mitigation Measures have been updated in the Response to Submissions to reflect this commitment. An appropriately worded condition of consent could also be imposed, with suggested wording being:</p> <p><i>Prior to commencement of relevant works, the Applicant must submit details of the chosen ESD measures incorporated into the final design to achieve LEED v4 Gold Certification as identified in the Environmentally Sustainable Design Strategy prepared by LCI dated May 2019. Details must be submitted to the satisfaction of the Certifying Authority.</i></p> <p>Infrastructure NSW acknowledges the reference to housing is erroneous.</p>
DPIE11	<p>Public Access</p> <ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • The stadium's public domain has been designed to accommodate a variety of crowd situations. The two peak events that have been considered are a concert of 55,000 persons within the SFS and a double header event where both venues (SFS and SCG) are at full capacity and evacuated at the same time. The latter being the worst case situation with approx. 90,000 patrons (it should be noted that only a portion of the 48,000 patrons in the SCG will exit through the SFS's public domain as the remainder will egress to Driver Ave and Fox Studios in an emergency). The assessment of the capacity of the public domain has been undertaken by desktop studies by Cox Architecture and reviewed by Arup and GTA Consultants. • For the desktop studies, the evacuation studies considered the discharge of patrons from exits to the closest boundary of the site. The studies confirmed that there was sufficient clearance to accommodate flows from these events in either situation. The assessment of flow rates uses the recommendations of the Sports Ground Safety Authority in their <i>Guide to Safety at Sports Grounds</i>. In the further development of the design, dynamic pedestrian modelling programmes will be utilised. • The comment extracted from the Executive Summary of the Environmental Wind Assessment at Appendix Z is incorrect and the assessment goes on to clarify that part of the site will be inaccessible to the public during non-game days and concurrent events at the SCG, reflecting the

No.	Extract	Recommended Response
	<p>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.</p>	<p>commentary in Section 4.10.2 of the EIS. This area comprises only the southern corner of the site, being Locations 8 to 13 in the wind modelling, and will be closed during non-event days and concurrent events at the SGC and SFS. This area is required to be closed during these key times to prevent conflicts with activities occurring within the adjoining SCG (which is not currently designed to allow for permanent public interface) and for SFS operational bump-in/bump-out activities, and to prevent potential conflicts with access and egress to SFS and SCG while these stadia are operating at the same time in a double-header scenario. During SFS events, all entrances and the entire external perimeter of the stadium will be accessible to the public. An updated assessment has been prepared by Arup and included at Appendix G of the Report.</p> <ul style="list-style-type: none"> • Whilst the southern corner of the site will be closed during certain times as discussed above, the eastern side of the stadium will remain open and accessible as it accommodates the new multifunctional play and recreation space at Busby's Corner. Wayfinding signage will clearly communicate circulation routes during events and non-events, as detailed in the Wayfinding and Signage Strategy at Appendix I of the EIS and Mitigation Measure D/O-SEC5. The southern side of the stadium will be secured with a perforated or clear barrier ensuring it does not result in a 'dead end'. Circulation around the north western edge of the stadium is landscaped and open, presenting the obvious path for pedestrians to use, and aligns with pedestrian desire lines for people moving through the site between Driver Avenue and Moore Park Road. Views along the south eastern edge of the stadium terminate with the SCG and the brick wall demarcating Fox Studios, and as such is naturally a less desirable and obvious path of travel for pedestrians. • Condition B10 requires that a review of pedestrian connections between the site and the adjoining lands on the eastern and southern boundary of the site be undertaken and consulted prior to the lodgement of the DA. The proposed development has achieved these requirements as detailed in the response in Appendix L and the assessment included in the Landscape and Public Domain Statement (Appendix C of the EIS) and the Urban Design Report (Appendix G of the EIS). These assessments confirm that the position of the proposed stadium and the design of the public domain as part of this DA enable public access to adjoining land to the south and east. It should be noted however, the ultimate delivery of these complete pedestrian links through Fox Studios to the east and along the shared boundary with the SCG to the south cannot be achieved without further works on the adjoining land that is controlled by other landowners. Namely, the continuation of links requires access through Fox Studios which can only be delivered by the CPMP Trust which owns this land and would be subject to negotiations with Fox Studios under long-standing land tenure agreements and all necessary planning approvals to complete the connection. While the Stage 2 SFS SSD DA provides for future links to occur through the site, it ultimately cannot deliver the next portion of the connections through the adjoining land as it is reliant on other landowners and leaseholders. The proposed design for which consent is sought under this SSD DA does not preclude the future links from occurring at a future stage after the completion of the Stage 2 SSD DA. Any future works would require an impact assessment at the appropriate time.
DPIE12	<p>Green Travel Plan</p> <ul style="list-style-type: none"> • The following initiative should be considered as part of the Green Travel Plan to ensure a sustainable operational approach: <ul style="list-style-type: none"> a. Improved accessibility for additional buses to cater for high volume in short periods. 	<ul style="list-style-type: none"> • During the preparation of the Response to Submissions, Infrastructure NSW and JMT Consulting met with TfNSW on three occasions (2, 9 and 20 August 2019) to discuss TfNSW's submission. JMT Consulting's <i>Response to TfNSW submission to Stage 2 DA (SSD 9835)</i> at Appendix J reflects the discussion and agreement reached with TfNSW.

No.	Extract	Recommended Response
	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> • With respect to the Green Travel Plan, TfNSW reiterated during these meetings that special event bus servicing is the responsibility of TfNSW and is determined on an event-by-event basis. The special event bus loop at Moore Park was recently enhanced by the NSW Government including the provision of new bus shelters. Special event buses are expected to continue to service Moore Park via the upgraded bus facility following the opening of the CBD and South East Light Rail service. • The GTP's purpose is to provide operational initiatives to support sustainable transport options to and from the stadium. The site is located in proximity of food and beverage options and entertainment within the Entertainment Quarter, Paddington and Surry Hills, however it is acknowledged that patrons will make their own choices about pre and post-entertainment and dining that are outside the control of Infrastructure NSW and the stadium's operators. The incorporation of externally operated venues to provide additional post-match entertainment options and facilitate the spreading the leaving times for patrons, as suggested by DPIE, is therefore outside the control or remit of the GTP. • Following consultation with TfNSW, further opportunities for taxis and rideshare services have been explored in the Transport Assessment which identifies areas capable of accommodating taxis and rideshare vehicles prior to and/or after an event. This consultation also noted the intent of minimising the number of vehicles travelling on the road network in the immediate vicinity of the SFS to reduce congestion, leading up to, and particularly following, an event. For this reason a 'geo-fence' (similar to that in place at Bankwest stadium) has been identified as the most appropriate solution for Uber and other ride-share operators. The geo-fence is proposed to be identified in consultation with TfNSW prior to the stadium's operation, and will be notified to Uber / equivalent offering car-pool rides once finalised. • Section 7.3 of the Transport Assessment considers in detail how the project integrates with the future CBD and South East light rail service. The GTP makes reference to this service and measures to encourage its use including wayfinding, integrated ticketing and improved travel information to customers
DPIE13	<p>Aboriginal cultural heritage assessment report</p> <ul style="list-style-type: none"> • 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): <ul style="list-style-type: none"> 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: 	<p>Curio Projects has prepared an updated Aboriginal Cultural Heritage Assessment Report (Appendix H), addressing the refined Mitigation Measures and assessment completed as part of Mod 2 to the approved Stage 1 DA.</p> <p>The following sections of the ACHAR have been updated as indicated to respond to the Department's feedback :</p> <ul style="list-style-type: none"> a. Section 5.4.1 which confirms that standard Aboriginal archaeological test excavation under the OEH Code of Practice is not possible at the SFS Redevelopment site. b. Section 6.1.4 which details that hand excavations would proceed in 50cm x 50cm quadrants. The first spit of the first quadrant will be undertaken in 50mm spits, with all subsequent quadrants to be excavated in 100mm spits, unless a shallower depth is defined by natural soil profiles or other stratigraphy/features are identified. c. Section 6.1.4 which details the methodology for completing both hand and mechanical excavation on the site. d. Confirmed in the discussion in Section 6.1.2. e. Confirmed in the discussion in Section 6.1.2, 6.1.4, and 6.1.5.

No.	Extract	Recommended Response
	<ul style="list-style-type: none"> – 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. <p>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.</p>	<p>f. Confirmed in the discussion in Section 6.1.4 and 6.1.5.</p> <p>g. Section 6.1.9 which commits to preparing a post-excavation report for the site that has been incorporated into the recommended conditions from the Heritage Council in Section 1.6 below.</p> <p>h. Refer to Section 6.1.7.</p> <p>The Mitigation Measures appropriately reflect the revised ACHAR.</p>
DPIE14	<p>Waste Management Plan</p> <ul style="list-style-type: none"> • SEARS requirement No. 24 requires the submission of an Integrated Water Management Plan. Please clarify whether this information has been submitted. 	<p>An assessment of the water use and savings has been provided with the Addendum Stormwater Response at Appendix N. This assessment confirms that the proposed rainwater tanks are capable of reducing the demand for toilet flushing to nil (100% rainwater use). Whilst realising this potential would be dependent on the number of events, attendance of events, and rainfall, it demonstrates a substantial commitment to the sustainable use of resources in the design of the proposed stadium.</p>
DPIE15	<p>Contamination</p> <ul style="list-style-type: none"> • 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. 	<p>The Detailed Site Investigation completed by Douglas Partners and submitted at Appendix J of the EIS considered that the site was suitable for its continued use as a sporting stadium without the requirement for remediation. Notwithstanding, Senversa at Appendix D confirms that they cannot verify that the site remains suitable for its intended use at this time, noting that it is not possible to produce a Section A Site Audit Statement until all earthworks are completed and there are no further opportunities for unexpected finds. This Section A statement, or as required a further Interim Audit Advice or Section B statement, will be prepared and issued to the Department in order to satisfy Condition C26 of SSD 9249 when available.</p> <p>It is emphasised that no change is sought to the existing use of the site, and that the requirements of Condition C26 in conjunction with the unexpected finds protocol referenced in Mitigation Measure CM-CON3 will provide the appropriate safeguards, and the Department can be satisfied that the site will be or can be made suitable for its intended use.</p>
DPIE16	<p>State Environmental Planning Policy No. 64</p> <ul style="list-style-type: none"> • 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. 	<p>The following curfews are proposed for signage:</p> <ul style="list-style-type: none"> • Illuminated stationary entry, directional, and heritage interpretation signs – no curfew is proposed. These signs are non-variable and assist in wayfinding and the heritage appreciation of the site, and as such will be illuminated between dusk and dawn and fitted with light sensors. The detailed design and operation of the illuminated components of these signs will be tested to ensure they comply with the relevant Australian Standards. • Digital, variable, signs - signs incorporating variable messaging viewed from Moore Park Road may be used up to 10pm on the day prior to an event and on the day of the event until the end of the game, with the exception of messaging relating to transport connections that may be used for a period of 1 hour after the conclusion of an event.
DPIE17	<p>Water Sensitive Urban Design</p> <ul style="list-style-type: none"> • 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. 	<p>WSUD</p> <ul style="list-style-type: none"> • Water capture, reuse, and treatment measures are identified in the Stormwater Management Plan at Appendix P of the EIS, which is referenced in the ESD Report. This includes details on the sizing and design of key elements such as rainwater tanks, and water quality treatment measures. These elements have been tested in MUSIC modelling, which demonstrates that the WSUD measures incorporated into the design of the stadium will enable the proposed development to comply with the identified water quality improvement targets for the project. In this instance, further

No.	Extract	Recommended Response
		<p>WSUD measures are not required. This is confirmed in the addendum statement by Aurecon at Appendix N.</p> <p>Energy Conservation</p> <ul style="list-style-type: none"> The preliminary energy conservation and efficiency measures include: <ul style="list-style-type: none"> the installation of rooftop photovoltaic cells (refer to Architectural Plans at Appendix B), incorporating energy efficiency measures through building fabric and services to meet and exceed National Construction Code (NCC) Section J requirements, and committing to achieving a LEED v4 Gold rating including energy efficiency measures, reduced on-site parking and a Green Travel Plan that supports optimal public transport use to and from the SFS, the future provision for electric car charging facilities, and installing reduced peak electricity demand measures. LCI has advised that a 350kWp PV system would be sufficient to serve the stadium and achieve NCC 2019 Section J compliance (the generated renewable energy is used to offset the stadium's greenhouse gas emission), as well as achieve certain credits within the LEED rating tool (Renewable Energy Production, Optimise Energy Performance & Regional Priority). A 350kWp PV system would need approximately 2,500m² of roof area. The Mitigation Measure combined with an appropriately worded condition of consent, would ensure the specific initiatives required to achieve a LEED v4 Gold rating are documented and endorsed by the relevant authorities.
DPIE18	<p>Flood evacuation</p> <ul style="list-style-type: none"> 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. 	<p>Aurecon has provided preliminary details on flood evacuation from the site in the event of an emergency, as provided at Appendix N of this report. Mitigation Measure D/O-FL1 provides that the detailed emergency evacuation plan with consideration of this preliminary work will be prepared to the satisfaction of the Secretary prior to the commencement of stadium operations, detailing flood evacuation routes from the site.</p>
DPIE19	<p>Noise Assessment</p> <ul style="list-style-type: none"> 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: <ol style="list-style-type: none"> providing additional information to satisfy (a) and (b) relating to event numbers and Event Acoustic Report requirements. providing additional information to satisfy each of the requirements of (e). 	<ul style="list-style-type: none"> The updated Noise and Vibration Impact Assessment at Appendix F addresses the impacts from these additional noise sources. Specifically, Section 5.4.1 of the Impact Assessment assesses these potential noise sources and Mitigation Measures 16 of the Assessment recommends the use of quiet sound systems and the direction of speakers in Fig Tree Place and Busby's Corner to the south away from residences on Moore Park Road. The specifications for acoustic louvres will be finalised when the final plant has been selected in consultation with the contractor and through the development of the detailed construction drawings. Accordingly, the specifications around acoustic screening of the louvres to plant and equipment is not known at this time. Notwithstanding, the Noise and Vibration Impact Assessment includes a recommendation to treat external plant where required to meet external noise criteria in Section 4.3.1 of the report. This has been included in Mitigation Measure D/O-NV2 and the Department may be minded to include the following suggested condition: <p><i>Details of noise mitigation measures for all mechanical plant, cooling towers and the like are to be detailed on the Construction Certificate drawings. Certification from an appropriately qualified acoustic engineer that the proposed measures will achieve compliance with the Noise Policy for Industry and other guidelines applicable to the development must be submitted to the Certifying Authority prior to the issue of the relevant Construction Certificate.</i></p>

No.	Extract	Recommended Response
		<ul style="list-style-type: none"> The impacts of wind noise and potential mitigation measures is provided at Section 4.3.5 of the Impact Assessment, and reflected in Mitigation Measure D/O-NV1. Further clarity around the definition of "sensitive receivers" has been included in Section 2.1 of the Noise Management Plan, including mapping of these nominated receivers. The Noise Management Plan has been revised by Arup and includes the following: <ul style="list-style-type: none"> Hours of operation, number and types of events – Section 3.1 and 3.2 Events that will be deemed to comply and those for which an Event Acoustic Report is required – Section 1.2 A definition of non-compliance and a breach of conditions – Section 3.4 A chain of responsibility for management of noise in relation to stadium activities – Section 3.7 Measures to minimise impacts – Section 3, 4, and 5. A procedure or guidance on the frequency, time of occurrence and duration of pyrotechnic displays – Section 3.5.4
DPIE20	Design Integrity Assessment <ul style="list-style-type: none"> 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. 	An updated Design Integrity Assessment is provided at Appendix Q confirming that the revised architectural and landscape plans are generally consistent with the competition entry and that the design demonstrates design excellence.

Edge Environment (on behalf of NSW Department of Planning, Industry and Environment)

No.	Extract	Response
EE1	<p>It was determined that the traditional type reports (i.e. noise and vibration, flora and fauna) go through a typical structure as per the SEARs where the proponent must typically do the following:</p> <ul style="list-style-type: none"> Define the baseline Describe the potential impact Provide mitigation options for the impact <p>We found this to be a robust approach.</p> <p>The ESD and climate change risk SEARs do not follow this same structure as clearly and therefore the responses in the Stage 2 EIS for Appendix M do not provide a high level of detail.</p>	Noted.
EE2	Using climate change as an example, Appendix M highlights high mitigation strategies that are generic, rather than identifying clear climate risks and opportunities for adaption and management. We would expect to see more detailed discussion of climate risks.	<p>LCI's exhibited ESD Report has identified a suite of climate change risks and adopted a set of standard mitigation measures, which reflects the project details available for the current planning and design status of the project.</p> <p>The type and degree of climate change risks that could be generated by the SFS Redevelopment will be informed by the selected materials, plant and equipment, as well as the construction and operational methodologies. These influencing factors are still in the process of being specified and</p>

No.	Extract	Response
		will continue to be refined through design development, consistent with standard project delivery practices. Consequently, climate change risks will need to continue to be considered and evaluated as risk mitigation initiatives are implemented by the appointed construction contractor and sub-contractors.
EE3	<p>Appendix M includes a design Life Cycle Assessment (LCA) report for the project in its appendices. The analysis that is presented is again, 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).</p> <p>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. There is a discussion of operational energy efficiency in the main body of the document.</p> <p>For a meaningful assessment of LCA impacts, we would expect to see all opportunities for impact reduction included in the same analysis and reporting, including construction and operational energy, waste and construction materials.</p>	<p>The SFS Redevelopment Stage 2 project is targeting the LEED v4 certified Gold rating and has committed to pursuing a "Whole Building Life-Cycle Assessment" credit under this pathway. This approach requires a comparison of a minimum of three (of a total six) impact categories against a baseline building, being GWP, ozone, acidification of land and water resource, eutrophication, tropospheric ozone and depletion of non-renewable energy resources). The adoption of global GWP as a proxy for all impacts rather than assessing a wider range of potential environmental impacts is appropriate under these circumstances.</p> <p>The exhibited LCA Report for the SFS Redevelopment Stage 2 project is a preliminary Life Cycle Analysis which reflects the planning and design phase that the project is currently in. Construction and operational contractors are yet to be appointed and consequently many of the mitigation measures that could be installed by the appointed contractor(s) are yet to be specified and are, therefore, unable to be confirmed (or modelled) at this stage. Infrastructure NSW is committed to completing this work, and accordingly the LCA will be undertaken during the detailed design stage once all contractors have been appointed and their inputs can be obtained. The Mitigation Measures reflect this commitment.</p>
EE4	<p>Appendix H contains a Green Travel plan. We suggest that the following initiatives should be considered as part of the plan:</p> <ul style="list-style-type: none"> Improved accessibility for additional buses to cater for high volume in short periods Creating a multi-use precinct to offer additional post-match entertainment options thereby spreading the leaving times for patrons Designated drive-through areas for Uber/equivalent offering car-pool rides only More detailed discussion of the Sydney Light Rail network and its integration with Sydney Football Stadium's green travel plan. 	<ul style="list-style-type: none"> During the preparation of the Response to Submissions, Infrastructure NSW and JMT Consulting met with TfNSW on three occasions (2, 9 and 20 August 2019) to discuss TfNSW's submission. JMT Consulting's <i>Response to TfNSW submission to Stage 2 DA (SSD 9835)</i> reflects the discussion and agreement reached with TfNSW. With respect to the GTP, TfNSW reiterated during these meetings that special event bus servicing is the responsibility of TfNSW and is determined on an event-by-event basis. The special event bus loop at Moore Park was recently enhanced by the NSW Government including the provision of new bus shelters. Special event buses are expected to continue to service Moore Park via the upgraded bus facility following the opening of the CBD and South East Light Rail service. The GTP's purpose is to provide operational initiatives to support sustainable transport options to and from the stadium. The site is located in proximity of food and beverage options and entertainment within the Entertainment Quarter, Paddington and Surry Hills, however it is acknowledged that patrons will make their own choices about pre- and post-entertainment and dining that are outside the control of Infrastructure NSW and the stadium's operators. The incorporation of externally operated venues to provide additional post-match entertainment options and facilitate the spreading the leaving times for patrons, as suggested by DPIE, is therefore outside the control or remit of the GTP. Following consultation with TfNSW, further opportunities for taxis and rideshare services were explored in the Transport Assessment submitted at Appendix H of the EIS which identifies areas capable of accommodating taxis and rideshare vehicles prior to and/or after an event. This consultation noted the intent of minimising the number of vehicles travelling on the road network in the immediate vicinity of the SFS to reduce congestion, leading up to, and particularly following, an event. For this reason a 'geo-fence' (similar to that in place at Bankwest stadium) was identified as the most appropriate solution for Uber and other ride-share operators. The geo-fence is

No.	Extract	Response
		<p>proposed to be identified in consultation with TfNSW prior to the stadium's operation, and will be notified to Uber / equivalent offering car-pool rides once finalised.</p> <ul style="list-style-type: none"> Section 7.3 of the Transport Assessment at Appendix H of the EIS considers in detail how the project integrates with the future CBD and South East light rail service. The GTP makes reference to this service and measures to encourage it's use including wayfinding, integrated ticketing and improved travel information to customers

1.2 City of Sydney Council

No.	Extract	Response
	Overview	
COS1	<p>The justification to redevelop the existing stadium has not been adequately demonstrated in the detailed application. Specifically, the stated "key improvements" for the redevelopment relating to diversity and safety and security are not adequately demonstrated.</p> <p>The City reiterates our concerns about the development as expressed in our objection to the Stage 1 concept proposal because the detailed proposal has insufficiently addressed the cumulative impacts, traffic congestion and disruption to the surrounding community resulting from the development. The Stage 2 detailed proposal does not adequately address some matters outlined in the Secretary's Environmental Assessment Requirements (SEARs)</p> <p>Further, insufficient information has been provided of the Stage 2 detailed proposal to enable the City to carry out an informed assessment of the application.</p>	Noted, no action required. Refer to the discussion in the sections below.
	Diversity	
COS2	<ul style="list-style-type: none"> It is acknowledged that the former stadium did not comply with the Building Code of Australia (BCA) and the Disability Discrimination Act (DDA) and did not meet the standards for access with people with a disability. This reasoning was a catalyst of the redevelopment, driving the need to provide accessibility to a diverse range of people with different mobility, ages, backgrounds and gender. The detailed proposal seeks to improve the accessibility of the site by designing the internal configurations of the stadium to the BCA in providing ample facilities and bathrooms, by generally providing adequate widths of travels throughout the stadium as well as the inclusion of prayer rooms. The notable improvement of accessibility is to the landscape and public domain in raising the concourse to create a continuous public concourse surrounding the stadium. The City is committed to being an inclusive and accessible city for everyone, now and in the future. The City seeks to meet its legislative obligations under the <i>NSW Disability Inclusion Act 2014</i>, <i>Disability Discrimination Act 1992</i> and the <i>NSW Carers (Recognition) Act 2010</i>, and create a truly inclusive city by providing equitable opportunities for participation for people who live, work and visit the city. The Inclusion (Disability) Action Plan 2017 - 2021 sets the framework and priorities to move beyond compliance with legislation towards a truly inclusive city. Further, The City has recently developed the Draft Inclusive and Accessible Public Domain Policy and Guidelines (the Guidelines) and provides a framework to apply relevant Australian access standards consistently. This includes best practice approaches in the design, maintenance and management of public domain spaces such as streets, footpaths, parks and open spaces, and infrastructure including street furniture. 	Noted, no action required.

No.	Extract	Response
COS3	<p>Moore Park Steps</p> <p>To address the requirements of the Stage 1 concept proposal to provide public access from the southwest or Driver Avenue frontage, the subject application proposes a continuous raised concourse level surrounding the stadium, which results in flush connections into the site along Moore Park Road. Also as a result of the raised concourse, and to address the approximate 6m height difference in levels, access from Driver Avenue is only facilitated through stairs and 2 lifts.</p> <p>The Landscape Plan and Statement, prepared by Aspect Studios, identifies the south-west corner of the site as one of the two primary entrances to the stadium as “open, legible connections to surrounding areas”. It is identified as the key pedestrian access point for the site, particularly given its location in leading patrons from public transport offerings of Central train station and existing bus and future light rail services on Anzac Parade. To this effect, it is imperative that the primary pedestrian route be an “open and legible connection” to the entrance of the stadium by providing a continuous accessible path of travel. The provision and reliance on 2 lifts adjacent to Driver Avenue for step free access is unacceptable and does not provide the optimal access outcome for a continuous accessible path of travel. This raises concern that the current design will require people with disability as well as elderly and families with prams to queue for lifts to access the precinct and stadium. Lifts are also prone to breaking down, and as such, equitable access cannot be guaranteed. They are not considered to have a comparable efficiency to a ramp. For the case of the development and anticipated patronage of the site particularly during events, 2 lifts are inadequate. Particularly during event days, this access will have issues relating to crowd management and would impact on the safety of spectators and visitors.</p> <p>An alternative design that includes an access ramp or series of ramps into the Driver Avenue entry must be investigated to ensure that equitable access is provided for everyone. All wayfinding signage must clearly indicate the accessible path of travel and the presence of barriers such as stairs.</p> <p>To support access from the Driver Avenue entry as well as to ascertain the safety of patrons, a level pedestrian crossing or signalised intersection is highly encouraged to be provided at the appropriate point to connect the path of travel from the public transport offerings to the Driver Avenue entry in order to ensure that pedestrian access is prioritised. The City also encourages that the pedestrian paths from Anzac Parade, including the Moore Park Light Rail Stops and from the Albert Cotter Bridge, through the south-west connection to the principal entry to the stadium be designed in accordance with the objectives and performance standards contained in Section 1.2 – Tactile Ground Surface Indicators and Section 2.1 – The continuous accessible path of travel in parks of the Guidelines.</p>	<ul style="list-style-type: none"> As confirmed in the memorandum by Arup (Appendix I) the two lifts provided are capable of accommodating the anticipated number of lift passengers prior to or after an event. In the unlikely event that both lifts are inoperative, equitable access is facilitated via the entrances from Moore Park Road which would be clearly signposted and directed by event staff. In this regard, information on the best path of travel for persons with mobility impairments would be available on the SFS website to assist in travel planning prior to an event. A ramp on the Driver Avenue frontage of the site which as best as possible meets the relevant design standards would need to be 98.5m long, which cannot be accommodated on the site, and more importantly, is an unreasonable length for persons with mobility impairments to travel uphill. Accordingly, it was Aspect Studios' conclusion that providing a ramp on this frontage would not be appropriate and as such was not pursued in the ultimate design for the site in favour of other design options. This is supported by Before Compliance which confirms that passenger lifts and stairs are the appropriate and accessible method for access on this frontage. The Wayfinding and Signage Strategy prepared by Aspect Studios and included at Appendix I of the EIS also identifies signage in the public domain indicating accessible paths and lift locations to assist internal to the site. The use stairs as part of stadia entries is a common and recognised design feature both in terms of national and international stadia, and as such is not an uncommon or unreasonable design response. The analysis prepared by COX Architecture and submitted at Appendix B confirms that stairs have been used to allow the major movement of patrons to and from stadia successfully within Australia and internationally including the Victor Trump Stand at the SCG, AAMI Park (Melbourne Rectangular stadium), Suncorp stadium (Brisbane stadium), Optus stadium (Perth stadium), Etihad stadium (Docklands Melbourne stadium), Cape Town stadium, and Emirates stadium (Arsenal stadium in London). In each instance, the stairs have been provided to overcome topographical constraints and prioritise the delivery of an accessible 360° external concourse surrounding the stadium and at-grade stadium entries. This also enables the main stadium entries and circulation areas to be vertically separated from the field of play and back of house areas. Accordingly, the proposed stairs are appropriate as they have been designed to comply with the relevant Australian building regulations and codes and the recommendations of the Sports Grounds Safety Authority's <i>Safety in Design of Sports Grounds</i> publication, will enable major pedestrian access and egress, and are consistent with the design outcome of other modern national and international stadia. In addition, sinking the stadium further into the site in order to reduce the extent of or remove the stairs on the Driver Avenue frontage would generate significant environmental impacts, and as such has not been pursued in the ultimate design for the site. Sinking the proposed stadium would: <ul style="list-style-type: none"> Potentially physically impact heritage items including Busby's Bore and areas of archaeological potential beneath the site, which are currently protected by areas of fill or limited excavation. Interface with the existing water table beneath the site, which would require a tanked structure to mitigate the risk of flooding to the playing field and building basement, as well as environmental impacts associated with changes and impediments to the natural flow of the groundwater.

No.	Extract	Response
		<ul style="list-style-type: none"> - Result in a significant level change between the existing footpath on Moore Park Road and the entries to the stadium off this frontage, which would require installing steps and further lifts. This would restrict the ability of persons with mobility impairments to access the site including the areas for passive and active recreation in the northern half of the site, and overall reduce the width of recreation, circulation spaces, and landscaping at the site edges that interface with residential areas. • At this time no crossing or signalised intersection is proposed at Driver Avenue for the stadium entry. Consistent with the operation of the former stadium, this portion of Driver Avenue will be closed for events and as such these measures are not required. This is supported by the traffic assessments prepared to support the EIS and this Response to Submissions, • The pedestrian path connecting the new light rail stop adjacent to Moore Park to Driver Avenue is being constructed as part of the CBD and South East Light Rail project. Whilst this link is to be delivered by TfNSW as part of the Light Rail, Infrastructure NSW is committed to working with CPMP Trust to consider better pedestrian links between the Tibby Cotter Bridge and the stadium, around Kippax Lake. This link was envisaged in the adopted <i>Sydney Football stadium Urban Design Guidelines</i> and will be discussed with the CPMP Trust. At a recent CCC meeting, Infrastructure NSW was advised that the new link could take the form of intuitive design through planting or other mechanisms rather than a typical hardstand path. The design of potential upgrades is, therefore, being worked through as part of a separate process. This commitment has been included in the updated Mitigation Measures to progress consultation with the CPMP Trust regarding this link, noting that it would not be within Infrastructure NSW and/or the SCGS Trust's jurisdiction to obtain the necessary development approvals.
COS4	<p>Public Domain Materials</p> <p>The proposal involves the use of brick pavements as a “front door” materiality feature at the key entries and gathering spaces. From an accessibility perspective, the small brick pavers on such a large scale can be problematic and can lead to uneven surfaces, which are uncomfortable for people with injuries and can be difficult for people with wheelchairs and limited mobility. An alternative paving material must be considered for the primary entrances, including larger format pavers with less opportunity for heaving. Areas can still be distinguished by colour contrast and use of textured borders to ensure that the intent for feature materiality is still achieved.</p> <p>The proposal also provides integrated seating options in the public domain. To ascertain that people with disabilities can enjoy seating with equity that is safe, predictable and consistent, the seating should be designed in accordance with the performance standards outlined in Part 1.4 – Stairs and ramps of the Draft Guidelines in the following ways:</p> <ul style="list-style-type: none"> • Ensure that some integrated seating include back and arm rests to make seating more inclusive for the elderly; • Provide regularly recessed areas in integrated seating to enable wheelchair users and families with prams to sit together; 	<ul style="list-style-type: none"> • The use of brick pavers was informed by Council's street codes, the context of Paddington and to bring human scale to the expansive concourse. Aspect Studios confirm that brick pavers are only problematic when laid on sandstone substrate, and as such the proposed brick pavers are to be laid on concrete slab with mortar joints. Further, Aspect Studios has successfully used brick pavers in the public domain for a number of projects within the City of Sydney Council LGA, including Australian Technology Park, Kensington Street in Chippendale and Newcombe Street in Paddington. These areas are used as main public thoroughfares and would encounter a similar level of access by people with injuries and are mobility impaired, and have presented no significant hindrance to affected members of the public. Through detailing and collaboration with the project engineer, an even application of brick can be achieved. • The revised landscape and public domain plans at Appendix C incorporate seating (Type 1 in the documents) with backrests to provide more inclusive seating options in response to this submission. The placement and design of seating and other public domain areas has been considered with regard to wheelchair users, providing gaps and areas for wheelchairs to move and rest within existing seating areas.
COS5	<p>Adult Change Facilities</p> <p>The provision of adult change facilities is commended. However, the availability of this facility must be widely promoted to ensure that users with high support needs are privy to the facility through the following means:</p>	<p>The Trust will implement the recommended notification measures upon the commencement of the operation of the stadium including providing details of the adult changing place on the National Public Toilet Map and the SFS website. Information provided from ticket agencies to the purchasers of tickets would be subject to further negotiations with ticket providers.</p>

No.	Extract	Response
	<ul style="list-style-type: none"> the National Public Toilet Map; a dedicated page about accessing the facility including access features available on the SFS website; any access information provided to ticket agencies who may sell event tickets at SFS. 	Mitigation Measure D/O-CM2 has been provided to reflect this commitment.
COS6	<p>Stadium Seating</p> <p>The submitted DDA Compliance Statement, prepared by Before Compliance, claims that the development will comply with the relevant standards, notably the number and grouping of wheelchair seating and companion seating required under the Disability Access to Premises Standard (2010) and that it will be distributed across all levels of the stadium. It is also noted that seating spaces would be sufficient to accommodate a large motorised wheelchair.</p> <p>However, the documentation submitted with the application does not provide any details of information on the above. Accordingly, there is no certainty that the required seating for people with disabilities is provided for.</p> <p>Whilst the proposal generally addresses accessibility, the proposal, notably the access from Driver Avenue, is a poor outcome and does not provide a practical method for egress to and from the site. Evidently, the provision of 2 lifts is extremely inadequate, particularly during event days and it cannot accommodate the inevitable large crowds that would be travelling to the site from public transport. Therefore, the attempt to address diversity is unsatisfactory and consequently, does not warrant the extensive redevelopment of the site.</p>	<p>A plan has been prepared by COX Architecture and included at Appendix B detailing the location of wheelchair seating and companion seating distributed across the levels of the stadium. Before Compliance confirms that these preliminary documents achieve the spirit and intent of the Disability Discrimination Act, with compliance to be confirmed at the detailed construction drawing phase of the development.</p> <p>As confirmed in the memorandum by Arup (Appendix I) the two lifts provided are capable of accommodating the anticipated number of lift passengers prior to or after an event.</p>
	Safety and Security	
COS7	<p>The detailed proposal seeks to address and improve the safety and security of the stadium by removing the perimeter fencing to allow for public access up to the stadium building line and through the site. The design, construction and operation of the stadium and public domain is also intended to minimise and mitigate potential threats.</p> <p>The FIFA stadium Safety and Security Regulations (the Regulations) and FIFA stadium Technical Recommendations and Requirements has been referenced in the Environmental Impact Statement in guiding the design of the proposal and the standards for security, media and corporate facilities. Specifically in relation to safety and security, the Regulations provide guidance on the duties and responsibilities of organisers before, during and after matches in relation to safety and security at the stadium. The basic principle for successful stadium safety and security achieves a balance between stadium design and stadium management. Particularly for stadium management, consideration to the staffing, safety and security planning, stadium risk assessments and policies, contingency and emergency plans, terrorism and record keeping of stadiums is fundamental to exercising good stadium management. It is noted that these Regulations are intended for FIFA events. However, it is appropriate to apply the Regulations to be implemented as a benchmark for use and operation of events held in stadiums in general.</p> <p>Whilst the detailed proposal has been architecturally designed to generally improve the stadium configuration as well as the public domain through the provision of a continuous concourse, the poor access provided on Driver Avenue and the design of the public domain in this regard would inhibit safety and does not allow for the smooth and efficient circulation of thousands of people in the event of a that. Further, the proposal inadequately demonstrates the measures to implement and carry out safety and security management of the stadium.</p>	<ul style="list-style-type: none"> The stadium's design has been developed in consideration of safety and security requirements. This includes the recommendations of FIFA's Football stadium Technical Recommendations and Requirements, the recommendations of the specialist consultant Intelligent Risks, plus review with stakeholders such as NSW Police. In accordance with the FIFA's recommendations the design of the stadium will avoid congestion, comply with local regulations and take into account fan behaviour such as active fans zone requirements for patrons of opposing teams. The operator of the venue has developed a management plan that includes the assessment of threats for each event in conjunction with the local authorities. This plan has been developed over 30 years (with the proposed plan representing the next iteration) and used for FIFA events such as the 1993 FIFA Youth World Cup, and for the football events for the Sydney 2000 Olympic Games. The site allows for permanent physical security inclusions such as hostile vehicle barriers to Moore Park Road. It also includes provision for overlay for events requiring a higher level of security such as perimeter fencing and screening points adjacent the boundary. The FIFA stadium Safety and Security Regulations would be applied for any FIFA event that may take place at the venue. The balance between stadium design and stadium management has been achieved in the strategy for designing and operating the proposed stadium. The design of the stadium and public domain has been considered with reference to security overlays and has been reviewed by Intelligent Risks with regard to terrorism and Aspect Studios and Intelligent Risks with regard to crime prevention, to assess the risk of incidences and provided recommendations and mitigation strategies on how to manage such risk. These elements will continue to be developed as the proposal is translated into detailed construction drawings, in consultation with an experience security consultant and relevant stakeholders. The Trust will also be developing a detailed

No.	Extract	Response
	<p>The Regulations provide guidance on the need to have a specialised team that facilitates the safety and security of the stadium by creating policies, creating and testing contingency plans, major incident plans and emergency plans and devise procedures for accommodating all spectators.</p> <p>The submitted 'Event Management Strategy', prepared by the Sydney Cricket and Sports Ground Trust, outlines that the Trust will develop a Security Management Plan for all security policies and procedures relating to event and non-event days and would be specifically tailored for SFS operations. The Strategy provides limited details on event day security such as security check points being carried out to the curtilage of the stadium and contingent on the scale of the event with separate access for the general public and staff, media and officials. The Strategy also details that the Trust enforces terms and conditions of entry that would continue to be displayed at all entry points to the event in addition to the event promotor's terms and conditions. Finally, the Trust outlines that they operate an extensive CCTV system that is controlled by full time security guards.</p> <p>Additionally, the 'Security and Risk Assessment Statement', prepared by Intelligent Risk, makes reference to a Security and Risk Assessment Strategy Report, which includes a Security Risk Assessment, Security Strategy and Hostile Vehicle Mitigation Strategy. Whilst the sensitivity of the information is acknowledged, the details are not publicly available. The methods of implementing safety and security for the site is lacking and does not completely address FIFA's requirements of recognising the significance of staffing and creating and testing contingency and emergency plans.</p> <p>Safety, security, emergency response and evacuation principles should not be considered in isolation to the detailed proposal as it may affect the design of the stadium and public domain. This should be considered concurrently with the design and development of the application and not at a later stage. Therefore, it would be reasonable to suggest that given the application has not demonstrated that satisfactory safety and security management plan is in place, the design of the stadium as proposed may not be suitable and acceptable.</p>	<p>Security Management Plan concurrent to this design development and documentation process, prior to the operation of the stadium. This Security Management Plan will address the final design of the stadium and the management principles included in the Anti-Social Behaviour Strategy and Event Management Plan. In this way, the design and operation of the stadium has been and will be integrated.</p> <ul style="list-style-type: none"> • The CPTED report submitted at Appendix N of the EIS has also been the subject of a peer review, which is provided at Appendix O. It confirms that the proposed development has generally achieved the principles of CPTED and as such will result in an appropriate design outcome for the site. • It is further noted that the design of the public domain and the entrance off Driver Avenue does not result in a poor outcome. This design meets the relevant Australian building regulations and codes and the recommendations of the Sports Grounds Safety Authority's <i>Safety in Design of Sports Grounds</i> publication. The Driver Avenue entrance is comparable to other national and international stadia that have been proven to allow the major movement of patrons to and from stadia successfully, and has been provided to overcome environmental constraints and deliver a fully accessible 360° external concourse surrounding the stadium and at-grade stadium entries. The accessibility and public domain benefits to users of this space from providing this continuous external concourse significantly outweigh any perceived negative effects of the transition in levels from Driver Avenue.
COS8	<p>Summary</p> <p>The application emphasises the redevelopment of SFS is necessary to ensure that the stadium maintains its classification as a Tier 1 stadium, which is outlined in the 'NSW Stadia Strategy 2012' as offering a <i>"seating capacity greater than 40,000; regularly host international sporting events; offer extensive corporate facilities, including corporate suites, open-air corporate boxes, and other function/dining facilities; may be the home ground for sporting teams playing in national competitions"</i>.</p> <p>It is noted that the design of the stadium has been developed in consideration of the operational requirements of a Tier 1 stadium, and therefore improve the operational efficiencies of the former stadium. This includes providing a wide, 360 degree internal and external concourse to provide efficient circulation of the site and stadium and allow for substantial food and drink offerings. The proposal seeks to achieve this by separating back of house functions to patron areas and be contained within the basement in new storage and maintenance areas.</p> <p>Further, it is noted that the shortcomings of venue experience of the former stadium was related to viewing quality and lack of weather protection. The proposed stadium provides 100% coverage to all seats to the dripline and clear sightlines to the pitch, video screens and other spectator zones to enhance the event day experience and atmosphere. Similarly, the former stadium provided limited facilities for hirers. The proposal seeks to enhance the hirer experience through the provision of additional and improved change rooms, coaches and media areas.</p>	<p>Improvements in accessibility, equity, safety and security have been key considerations in the detailed design and proposed management of the proposed stadium. The above discussions highlight how the proposed development represents an appropriate and supportable outcome with regard to these issues.</p>

No.	Extract	Response
	<p>It is recognised that the detailed proposal addresses the technical and operational shortcomings of the former stadium, particularly as a sporting venue. However, irrespective of the above, the proposal has not been designed appropriately to address diversity to allow for optimal access and egress from the primary pedestrian entry of the site. Also, there are inadequate safety and security management measures to ascertain that a venue that can host up to 55,000 people has the ability to respond to emergencies and threats.</p> <p>These factors are fundamental to the operation of the future stadium and in their absence, the justification for stadium renewal has not been met. In summary, the “key improvements” that were provided as justification for the project are not demonstrated and must be addressed.</p>	
Outstanding issues of the Stage 1 concept proposal and inconsistencies with the Secretary’s Environmental Assessment Requirements		
COS9	<p>Whilst the proposal is consistent with the maximum building envelope approved in the Stage 1 concept proposal, the City raises significant concern that the Stage 2 detailed proposal fails to address the issues expressed in our objection to the Stage 1 proposal that are critical to any development of this scale. Primarily, these concerns relate to built form and urban design, transport and access in demonstrating sustainable transport planning, lack of consideration to environmental sustainability as well as tree removal and landscaping. These concerns are reiterated in the following sections.</p>	<p>It is emphasised that the proposed development has addressed the SEARs and the relevant requirements of the Stage 1 DA, and in doing so has demonstrated that the proposed development is supportable and does not result in any adverse environmental impacts. This is discussed further in the following sections.</p>
COS10	<p>Risk of neighbourhood disturbance from increased concerts and major entertainment events is not acknowledged</p> <p>The City emphasises the concern raised in our Stage 1 objection that the proposal does not provide substantiated evidence that the primary operation of the SFS is principally for a sports stadium. The established evidence of low attendances for most sporting matches compared to the stadium capacity implies the increased risk of concerts and major entertainment events that are not covered in the Environmental Impact Statement (EIS). This would expand on the primary use of the venue as a sports stadium to accommodate broader uses and generate return on investment. The increased events would have significant cumulative impacts, particularly relating to traffic and parking.</p> <p>As stated in our Stage 1 objection and according to the EIS, “the existing stadium currently limits itself to six (6) concerts/entertainment events per annum, which will not change. There will also be no change to the existing time limits for sporting, concert and other events”.</p> <p>There is well-established evidence of low attendance numbers for most sporting matches at the stadium (excluding grand finals and one-off matches). Some estimates put the average attendance levels at just 40% or 17,000 of the maximum 42,000 capacity.</p> <p>According to the Infrastructure NSW Business Case summary, the assumed total annual attendance increase, with the 6 event restriction continuing, is in the order of 250,000 to 300,000 patrons. Based on the recent trends and a changing media landscape, the estimated patronage for sporting fixtures are overly optimistic. Continuing low patronage (in the face of potential ticket price increases) for sporting matches heightens the risk that a revised program of major entertainment events will be necessary to prop up the business case. This risk and development potential is omitted from the EIS and therefore cannot be assessed.</p>	<p>There is no proposal to increase the maximum six concerts per calendar year, which has been confirmed in the Stage 1 and Stage 2 project documents. Condition C9 and Mitigation Measure CP-NV3 of the Stage 1 consent, all reiterate that the established maximum number of concerts will be enforced. Mitigation Measure D/O-O1 has been revised to make clear that this also incorporates the requirement that the number of concerts does not exceed an average of 4 per year over a rolling 5-year average. It is expected that a further condition of consent will be imposed by the Department on the Stage 2 consent to this effect. The following is suggested:</p> <p><i>The number of concerts at the stadium are not to exceed six (6) per calendar year, with an average of four per year over any rolling five-year period between the Sydney Football Stadium and Sydney Cricket Ground.</i></p>

No.	Extract	Response
	Built Form and Urban Design	
COS11	<p>stadium design</p> <p>The detailed proposal provides a 'bowl' roof form and seeks to reference the 'saddle' design of the former stadium roof by heightening the roof form above the eastern and western stands to sweep down to the reduced heights of the northern and southern stands. This design response results in increased heights to the eastern and western sections as well as the depth of the development when compared with the former stadium.</p> <p>Whilst it is acknowledged that the proposed built form is reduced when compared to the approved Stage 1 envelope, the bulk and scale is larger than the envelope of the former stadium and is excessive to the context of the Paddington Heritage Conservation Area.</p> <p>Particularly, when viewed from Moore Park Road, Cook Road and Stewart Street, the proposed stadium 'bowl' is explicitly prominent and dominates the skyline. The unnecessary bulk is at odds with the prevailing fine grain character and detrimentally impacts on the visual and heritage quality of the area. This is emphasised by the significant tree removal already granted under the Stage 1 concept approval, which would typically provide natural screening to reduce any bulk and scale impacts of the development.</p> <p>While the City is broadly supportive of photovoltaic solar panels, the solar panels proposed to be located on the north-western section of the roof of the stadium, are visible from the Paddington Heritage Conservation Area. The Visual Impact Statement, prepared by SJB, provides photomontages of the development and shows that the location of the solar panels have a significant visual impact. Overall, the excessive roof form, together with the poorly located photovoltaic solar panels contribute to the unnecessary bulk and scale of the development. A greater effort should be made to relocate the solar panels and reduce the roof form of the development to be consistent with the scale of the former stadium, so as to be sympathetic to the fine grain, heritage character of the surrounding area.</p>	<p>The ultimate architectural design of the stadium responds to the unique context of the site and provides a sensitive and appropriate built form. Whilst the depth and height of the eastern and western standards are greater than the former stadium, they are contained within the building envelope previously assessed and approved under the Concept Proposal and will not result in any significant or adverse environmental impacts.</p> <ul style="list-style-type: none"> As detailed in the Visual and View Impact Assessment at Appendix W of the EIS, the proposed development will not adversely impact or otherwise substantially change the character of views from Moore Park Road, Cook Road or Stewart Street. The former SFS was a landmark element of existing views, with view lines often terminating at the stadium facade or being available over the existing stadium roof from higher vantage points within the Conservation Area. The proposed development does not materially change these existing views, recognising that the development replaces a longstanding stadium. This is supported by the Heritage Impact Statement at Appendix T of the EIS which confirms that the stadium design is sympathetic to its surrounds and is commensurate with the overall form, massing and general colour palette of the former stadium ensuring that existing view lines of heritage significance will be maintained without impact. Furthermore, the materials and finishes selected for the base of the stadium and the public domain around the stadium responds locally to the heritage views and items from each approach, further improving heritage views. The trees required for removal to facilitate that the proposed development will be replaced at a significant ratio of 3.3 new trees for every one removed on the site, ensuring that the existing natural screening provided by this landscaping will be maintained and significantly enhanced. <p>The updated Architectural Plans at Appendix B show the revised locations of the proposal solar panels, which have been relocated to reduce their visibility from the Paddington Heritage Conservation Area in response to this submission.</p>
COS12	<p>Public domain connection between Moore Park Road to Driver Avenue</p> <p>The new public domain connection on the west side of the stadium, linking Moore Park Road to Driver Avenue, has a contorted, sub-optimal alignment, with poor sight lines and a major change in level to the monumental stair on Driver Avenue. This problem is largely caused by the intrusion of the existing, low-quality Rugby League building (other such buildings are being demolished as part of the project). This building blocks site lines, creates a pinch point in the external concourse with a major change in level and awkward interface. The placement of the lifts, geometry of the stair and incidental pockets of landscape further compromise this area as public space, creating unfortunate dead end spaces.</p> <p>This problem brought about by the site plan, could be better resolved by either moving the stadium slightly to the east or by removing the eastern end of the NRL Building (this sort of adaptation has been carried out frequently in inner Sydney when streets have been widened or created). The objective should be to make a generous, barrier-free and unambiguous public connection on the western side of the stadium - the current proposal is considered to not be an optimum design outcome.</p>	<p>The proposed development has been informed by and responds to the existing context of the site, noting that the National Rugby League Building is in operation at this time and is not included in the approved Concept Proposal (Stage 1 DA) boundary.</p>
	Transport and Access	
COS13	<p>It is acknowledged that the site is located within close proximity to existing and future public transport modes including the new light rail, bus services and Central and Kings Cross train stations.</p>	<p>The proposed development does not seek to significantly change the existing car parking arrangements. Strategic initiatives have been developed and detailed through the draft Green Travel Plan, Transport Management Plan and Event Management Plan for reducing car dependency and</p>

No.	Extract	Response
	Notwithstanding this, the City reiterates that the detailed proposal fails to adequately address appropriate measures for reducing private car usage, management of mass transit, vehicular and pedestrian movement as well as safety, walking and servicing.	managing travel demand to and from the site, all of which are committed to being finalised post approval in consultation with TfNSW. Refer to the discussion in the sections following.
COS14	<p>On-site car parking numbers</p> <p>The proposal seeks to retain the existing car parking spaces and reconfigure the MP1 car park to accommodate approximately 600 car parking spaces that would be reserved for members and VIPs only on event days.</p> <p>It is noted that Condition No. 39 of the Stage 1 consent mandates that the Stage 2 proposal must maintain the number of car spaces currently available at the MP1 car park and maintain the same access point. However, the City is very concerned that there is no commitment to reduce on-site car parking numbers for the stadium redevelopment, and therefore, the proposal does not demonstrate sustainable transport planning.</p> <p>The 'Transport Assessment for Stage 2 Development Application', prepared by Arup, does not set a clear vision to genuinely reduce private car mode to access the stadium. The use of grass top/informal parking spaces during event days is not supported. The report admits to convert temporary parking structures into permanent structures. This is deemed unsustainable.</p> <p>Whilst the grass top parking is not part of the stand-alone stadium redevelopment, the reliance on these huge car parking spaces and their future modal split does not demonstrate the NSW government's commitment to permanently reduce car parking and encourage sustainable transport planning.</p> <p>Overall, the abundance of permanent and formalised parking will encourage people to drive on and outside of event days and will increase the mode of private vehicles to the site. As a result, soft measures such as the Green Travel Plan and Transport Access Guide will not work if the parking supply is not constrained.</p>	<p>No new parking for general patrons of the stadium will be provided as part of the development, however, the existing MP1 Car Park will be reinstated in accordance with the Concept Proposal. It is emphasised that the existing off-site parking facilities are not located on land controlled by the SCSG Trust, and as such the operation and management of these facilities is outside of the direct control of the stadium operator. It is understood that the staged removal of temporary event parking will occur in the future in exchange for also exploring options for satellite parking with the Master Plan committing to no 'net loss of parking within the precinct'. The proposed development does not prevent or otherwise impede this from occurring.</p> <p>The Trust also supports the use of active and sustainable modes of travel when accessing the site. The measures outlined in the Green Travel Plan demonstrate the Trust's commitment to creating a more sustainable and resilient stadium, with improved operations that reduce the impact on the local and wider environment.</p>
COS15	<p>Green Travel Plan</p> <p>In light of the above, the submitted Green Travel Plan (GTP), prepared by Arup, does not meet the City's requirements as prescribed in Schedule 7 of Sydney Development Control Plan (DCP) 2012.</p> <p>The proposed GTP reiterates the status quo in terms of access, unreasonably retains the intrusive parking across areas of Moore Park, and anticipates that the current capacity of the event buses will be transferred to the new Light Rail. Parking for the stadium, if required, should be wholly located on the SFS land. The GTP assumes that the capacity of the Light Rail will be available for event crowds when it is more likely that it will already be carrying significant crowds (especially on weekday evening peaks) with very limited capacity to move event crowds to Central or elsewhere.</p> <p>The GTP also does not adequately cover Uber and limousine drop off and pick up, which is likely to be an increasing problem given the expected increase in use associated with corporate seating. There is an existing problem in South Paddington, reported by residents that limousines illegally park throughout the area during game time to be able to pick up after the game. Such waiting/parking if it is to occur needs to be accommodated on site rather than being a nuisance to adjoining residents.</p> <p>The GTP should set a clear time-bound target for reducing private car travel to and from the stadium and should document the measures to achieve the target. A GTP Coordinator must be appointed to implement and monitor the travel plan. The GTP will have a monitoring and evaluation mechanism to update the plan from time to time so that it is a "living document". The report should regularly be</p>	<p>The GTP and broader transport assessment identifies several measures that enhance access for stadium staff, precinct visitors and people attending events at the redeveloped SFS over and above the status quo. These include:</p> <ul style="list-style-type: none"> • potential separate upgrades to the link around Kippax Lake as discussed above, which connects to the Albert Tibby Cotter bridge and the new pathway to the Sydney Light Rail stop; • improved access through the introduction of the Sydney Light rail service and the future Moore Park Road cycleway (considered in the GTP); and • recognition in the GTP that bicycle parking will be significantly enhanced because of the redeveloped stadium compared to current conditions. As outlined above, Infrastructure NSW and JMT Consulting met with TfNSW numerous times during the preparation of the Response to Submissions. Following consultation with TfNSW, further opportunities for taxis and rideshare services have been explored in the Transport Assessment which identifies areas capable of accommodating taxis and rideshare vehicles prior to and/or after an event. It was also agreed that transport planning and operational requirements should seek wherever possible to minimise vehicles travelling on the road network in the immediate vicinity of the SFS to reduce congestion. For this reason a 'geo-fence' (similar to that in place at Bankwest stadium) has been determined to be the most appropriate solution for Uber and other ride-share operators. TfNSW has confirmed that final extent of the geo-fence is not required to be identified as part of the Response to Submissions. Infrastructure NSW has agreed the geo-fence is to be identified in consultation with

No.	Extract	Response
	<p>published to the public and the annual performance report be sent to Council for assessment and evaluation in 5 years. The GTP should also include a wayfinding plan to the bicycle parking and end of trip facilities and should have a plan to widely circulate the Transport Access Guide (TAG) to the public. The aim of the TAG is to ensure people know how to get to the site by walking, cycling or public transport as well as by car.</p> <p>The TAG should be incorporated in the GTP and this component is lacking in the detailed proposal. The proposal does not meet the requirements of Sydney DCP 2012 and it is highly recommended that a revised GTP be developed in consultation with relevant stakeholders and the City.</p>	<p>TfNSW prior to the stadium's operation, and will be notified to Uber / equivalent offering car-pool rides once finalised.</p> <ul style="list-style-type: none"> • JMT Consulting's Response to TfNSW submission to Stage 2 DA (SSD 9835) has considered a scenario where parking in EP2 and EP3 is removed and satellite park and ride areas outside of the precinct are introduced, reiterating that the Master Plan envisages no net loss of parking within the precinct. • A standalone wayfinding and signage strategy has been prepared as part of the SSD DA which considers how best to direct people to bicycle parking and public transport nodes. The strategy will continue to be developed in consultation with relevant stakeholders as reflected in the Mitigation Measures (D/O-TA4). • The GTP will be regularly monitored, assessed and updated by the SCG Trust, with a number of monitoring mechanisms suggested including: <ul style="list-style-type: none"> - Travel surveys - Review of public transport data - Parking / pedestrian counts - Demand for bicycle facilities <p>In this way the GTP will remain a 'living document' and adapt to the changing needs of users.</p>
COS16	<p>Access and traffic generation</p> <p>The Stage 2 traffic report has updated the SIDRA software modelling to include the 'worst case' double header events when the SFS and Sydney Cricket Ground (SCG) are both in use. The results confirm that three out of the five intersections that were tested will have a Category C Level of Service rating. ARUP's traffic reports recommends that the double header counts of 95,000 people is an "extremely unlikely scenario" and the modelling results show no intersection will be performing less than a Level of Service Category C. The RMS Traffic Generating Development Guidelines outlines that a Category C provides a satisfactory Level of Service for intersections, however, most drivers are restricted to some extent of their freedom to select their desired speed and to manoeuvre within the traffic stream. The general level of comfort and convenience noticeably declines at this level.</p> <p>As outlined above, general traffic congestion will worsen if a reduction of on-site car parking is not prioritised and made explicit. The frequency of events is proposed to increase. This indicates that traffic congestion would become more frequent and in conjunction with the potential permanent installations to the temporary car parking spaces, traffic congestion would worsen and significantly impact on the local road network during and outside of event days.</p>	<p>The stadium will continue to operate in the same manner as the former stadium utilising the same operating hours, restriction on the maximum number of concerts, and the operational procedures outlined in the Event Management Plan including the Noise Management Plan. The former stadium operated successfully without an established maximum cap.</p> <p>The SIDRA modelling considered the worst-case scenario where there are concurrent maximum capacity events at the SCG and SFS. It modelled the operation of key intersections in Moore Park prior to and following the conclusion of a concurrent event and confirmed that during the worst 30 minute peak hour period, the key intersections would continue to operate at LOS B or C which are deemed to be acceptable levels of service in the RMS' Traffic Generating Development Guidelines. LOS B and C are defined as intersections operating well with spare capacity and some delays. The worst-case scenario traffic conditions resulting from the operation of the proposed stadium are therefore neither unreasonable nor different from the former stadium.</p> <p>The combined effects of no increased car parking (compared to current levels), significant improvements in public transport provision and accessibility and implementation of the Green Travel Plan measures indicates the stadium is capable of generating less traffic than the previous stadium.</p>
COS17	<p>Walking</p> <p>The Stage 2 Traffic Report includes a Pedestrian Route Assessment to identify all pedestrian routes between nearby public transport nodes and the site. The analysis indicates that, even under a worst-case double header scenario of 95,000 patrons, footpaths in the precinct have the capacity to accommodate crowd movements with a reasonable pedestrian level of service.</p> <p>During events, the cycleway along the Moore Park Road boundary would be used for pedestrians. Whilst the City does not object to this, it is expected that people would take an alternative route during events.</p>	<ul style="list-style-type: none"> • Infrastructure NSW has consulted with TfNSW (including the Sydney Light Rail team) to inform the development of the transport strategy. This consultation has confirmed that the Devonshire Street footpath has been designed to accommodate major pedestrian flows arising from events (including double headers) in Moore Park. • Currently the highest pedestrian flows are observed along Foveaux Street and Fitzroy Street due to the construction works along Devonshire Street associated with the Sydney Light Rail project. Following the completion of works and the opening of light rail, it is expected a significant number of people will choose to walk to/from Central via Devonshire Street due to its gentler gradient and wider footpaths when compared to Foveaux Street. TfNSW intends to designate this route (via

No.	Extract	Response
	<p>The Traffic Report has stated that a new 6m wide pathway will be provided within Moore Park as part of the Sydney Light Rail project to connect Driver Avenue with the new Moore Park light rail stop. The City is concerned that the post-light rail plans for footpaths on Devonshire Street have not been designed to accommodate for stadium crowds. ARUP's report states that currently, the highest volumes of pedestrians are seen along Foveaux Street and Fitzroy Street, which is perceived by most people to be the quickest and most direct route. The pedestrian route capacity assessment states that the double header demand and capacity of 0.71 pedestrians per metre per minute were found for Foveaux Street. This is an acceptable pedestrian level of service. However, as previously raised in the Stage 1 objection, the traffic report has not considered the review of signalised intersections on the Foveaux Street walking route.</p>	<p>signage) as the primary route to Central Station from Moore Park. Potential separate upgrades to the connection around Kippax Lake will be investigated further to enhance connections between the Albert Tibby Cotter Bridge through to Devonshire Street.</p> <ul style="list-style-type: none"> • NSW Police and Transport Management Centre (TMC) staff are positioned at signalised intersections (such as those on Foveaux Street) following the conclusion of major events. Their purpose is to manage pedestrian flow, and if necessary, hold back traffic to allow pedestrians to move freely and safely.
COS18	<p>Road safety</p> <p>The submitted traffic report states that the detailed proposal provides increased plaza areas around the Moore Park Road entry point to improve pedestrian safety by creating additional pedestrian waiting areas within the site boundary. The introduction of formal taxi-ranks and the enhancement of the walking route via Devonshire Street and its status as the preferred walking route between Central and Moore Park is supported as it will contribute to road and pedestrian safety.</p> <p>To this effect, efficient wayfinding is paramount and it is recommended that a real-time digital display could better serve the purpose and would help to reduce unnecessary traveling to find a parking spot.</p>	<p>The Wayfinding and Signage Strategy at Appendix I of the EIS details the proposed permanent and temporary wayfinding measures to assist patrons in getting to and from the site. At this time, no parking space counter is proposed for the MP1 car park, noting that the reinstated carpark is only for staff and members and as such no change is proposed to the existing operation of parking on the site.</p> <p>Wayfinding within the precinct more broadly will be considered as part of the development of the Moore Park Traffic and Transport Management Plan being led by TfNSW, as per Mitigation Measure D/O-TA4.</p>
COS19	<p>Taxi rank on Moore Park Road and Lang Road</p> <p>Taxi ranks are proposed on Moore Park Road, which is a Council road (Council Controlled Regional Classified Road). As such, any change to the kerb side parking controls will require approval from the Traffic Committee.</p>	<p>No modification to Moore Park Road is proposed at this time. A future Event Traffic and Transport Management Plan is to be developed for the site with consideration of taxi and rideshare services (as appropriate) in consultation with TfNSW and relevant stakeholders. Any changes to set-down and pick-up areas will form part of a separate and future stage of the project.</p>
COS20	<p>Bicycle facilities</p> <p>The Stage 2 Traffic Report suggests that a total of 150 bicycles have been provided within the public domain. 45 racks for 90 bikes are located along Moore Park Road to service the north-west as well as 30 racks for 60 bikes are provided along the eastern stadium entries.</p> <p>In consideration of the projected 1,000 full time jobs for SFS alone and 45,000 spectators, the proposed bicycle spaces are insufficient. Whilst the City's expectation is of a higher percentage of approximately 10% of bicycle users, the proposal provides bicycle parking counts for less than 0.2% of the proposed stadium capacity.</p> <p>Moreover, the bicycle plan as illustrated in the landscape and public domain plans, demonstrates that the bicycle racks within the public domain are not weather protected and are not secured. These racks are ideal for visitors and spectator use. However, this does not comply with the staff/employee bicycle parking requirements of Sydney DCP 2012. Additionally, no lockers, showers and bathrooms have not been provided as part of the end of journey facilities of the stadium.</p> <p>The City expects that quality bicycle and end of journey facilities are to be provided to this complex. The layout, design and security of bicycle and end of journey facilities must comply with the minimum requirements of Australian Standard AS 2890.3:2015 Parking Facilities Part 3: Bicycle Parking Facilities and Sydney DCP 2012.</p>	<ul style="list-style-type: none"> • Currently there are approximately 50 bicycle parking spaces provided for visitors of the Moore Park precinct. The proposed 150 bicycle parking spaces for visitors represents a significant increase when compared to the existing situation. Detailed travel surveys were undertaken for a number of events during the operation of the SFS, which indicated demand for bicycle parking spaces reached a peak of between 40-50 at any one time. The proposed provision (150 spaces) is considered to sufficiently exceed both current and future demand projections. As part of the GTP, the SCG Trust will monitor bicycle parking demand across the precinct. Should demand exceed supply, consideration will be given to providing additional bike parking for the precinct. • Permanent staff will have their own parking in a secure location under the stairs of the MP1 carpark, which is in addition to the parking proposed for the general public.

No.	Extract	Response
	Specifically for the development, at least Class B (AS 2890.3:2015) bicycle parking and associated end of journey facilities should be provided for 1% of the total fulltime staff with an option to provide additional facilities for future demand. Also, Council's new design guide requires a minimum of 3.5m wide shared path to be provided adjacent to a bus stop/shelter.	
COS21	<p>Environmental Sustainability</p> <p>The City reiterates that the concern detailed in our objection to the Stage 1 concept proposal and the requirement under the SEARs has not been addressed in that the proposal does not demonstrate ecologically sustainable development (ESD).</p> <p>The Stage 2 detailed proposal does not provide details on the existing energy and water use. As such, it is difficult to compare the redevelopment of the stadium and whether it has an improved or worse total impact to that existing. This unwillingness to compare the 'new' with the 'old' in terms of energy use, potable water use and operational waste generation demonstrates a lack of transparency and leadership in exercising best practice environmental performance.</p> <p>Further, the proposal utilises the LEED rating scheme, which is a US scheme. The energy modelling and compliance pathway methodology of the LEED scheme is weaker than the Infrastructure Sustainability Council of Australia (ISCA)'s sustainable infrastructure tool or Green Star Design. Therefore, the LEED rating tool is not appropriate for the Australian context and the Australian sustainability rating tools should be utilised.</p> <p>The development proposes a rainwater tank to utilise rainwater harvested from the stadium roof for irrigation with the size and location to be confirmed. This provides the City with no indication of the proportionality of use of recycled water in place of mains water. There is no indicative provided on the potable water savings made over time. The use of captured water is insufficient and details are lacking in relation to the proposed bore water irrigation of the site.</p> <p>An indication of the proportionality of the annual on-site renewable energy generated from photovoltaics compared to the energy imported from the main grid electrical supply is required to determine the energy consumption of the development and whether it is aligned with the NSW Government's 'Net Zero Emissions by 2050' carbon abatement ambition.</p>	<ul style="list-style-type: none"> • A direct comparison of the existing and proposed stadiums is not able to be completed due to the differences in scale, range of uses / functionality and technology. The new stadium will be equipped with new technologies and AV systems, which were not installed in the previous stadium. In addition, until the new stadium is operational (for at least a 12-month period), the true energy consumption is unable to be quantified and would only be speculative at this stage (particularly in light of the plant, fittings, equipment and contractors not having been confirmed). It is accordingly unfeasible to compare the new stadium against the former stadium. A more appropriate approach is the one adopted which compares a baseline model (the same building with code-compliant equipment and systems) with the proposed systems as part of the targeted LEED Energy and Water credits. This approach will provide a better comparison on the proposed energy and water saving initiatives to be implemented. As outlined above, this analysis will be undertaken in the detailed design stage as part of the LEED works. • Condition C30 and Mitigation Measure CP-ESD1 require that the development demonstrate it can achieve a LEED Gold rating. An appropriately worded condition would reinforce this requirement, and as such the following is suggested: <i>Prior to commencement of relevant works, the Applicant must submit details of the chosen ESD measures incorporated into the final design to achieve LEED v4 Gold Certification as identified in the Environmentally Sustainable Design Strategy prepared by LCI dated May 2019. Details must be submitted to the satisfaction of the Certifying Authority</i> • The addendum Stormwater Assessment at Appendix N provides an assessment of the potable water savings and balance, noting that the rainwater tanks and their capacity are shown on the Architectural Plans and detailed in the Stormwater Management Plan at Appendix P. This assessment confirms that the proposed rainwater tanks will effectively offset the potable water demand for toilet / urinal flushing. This is assuming one sold-out event per week as a baseline, and as such would be expected to change depending on the scale and frequency of events as well as rainwater collection. • No change is proposed to the existing quantity, source, or use of bore water on the site. The SCSG Trust is licensed to use 20 ML per year of bore water extracted from the Botany Sands aquifer for playing field irrigation across the SFS and SCG.
COS22	<p>Tree Removal</p> <p>The 'Arboricultural Impact Assessment and Tree Specification', prepared by TreeIQ has been reviewed and it is indicated that a total of 7 trees are proposed to be removed to facilitate the development.</p> <p>The documentation submitted with the application indicate that 'Tree B', which is a mature street tree, is proposed to be removed for the widening of the Moore Park Road site entry and exit. However, the submitted plans illustrate that there are no new driveways proposed in this area and that the tree removal is to accommodate pedestrian access from Moore Park Road.</p> <p>Accordingly, the proposed removal of Tree B is not supported and it is recommended that the tree be retained and protected with other street trees surrounding the site.</p>	Tree B located on the Moore Park Road frontage of the site is to be retained in the revised Landscape Plans provided at Appendix C .

No.	Extract	Response
COS23	<p>Replacement Tree Planting</p> <p>The legacy of a tree-lined boulevard on Moore Park Road and Driver Avenue has been diminished and significantly impacted by the removal of 28 trees to facilitate the construction. At the Stage 1 concept proposal, the applicant made a commitment for compensatory tree planting. The SEARs also required the provision of a detailed landscape and public domain plan showing the existing (pre-Stage 1 works) and proposed services and reinstatement works to the MP1 Carpark including replacement tree planting.</p> <p>There were no plans submitted with the detailed proposal relating to the replacement of tree planting. Compensatory advanced tree planting for trees removed during the Stage 1 works should be integral to the Stage 2 works. Details of trees to be replaced as well as species and size of trees must be provided.</p>	<p>The Landscape Plans prepared by Aspect Studios detail replacement planting occurring on the site, including surrounding the MP1 carpark. It is further noted that the existing trees on the Driver Avenue and Moore Park Road frontages of the MP1 carpark have not been removed as part of the Concept Proposal, and are not proposed to be removed as part of this Stage 2 DA. The proposed development, therefore, does not impact the tree-lined boulevard of Moore Park Road and Driver Avenue.</p> <p>Tree planting will continue to exceed the 1:1.5 ratio of trees removed to trees planted as required under Condition C8 of SSD 9249.</p>
	Insufficient Information	
COS24	<p>Operational Noise Assessment</p> <p>The redesign of the shape of the stadium from a 'saddle' to a 'bowl' shape, which has higher tiered seating stands and facades to the north and south would reduce environmental noise emission to the surrounding area.</p> <p>However, as a venue designated under Clause 90 of the <i>Protection of the Environment Operations (General) Regulation 2009</i>, the stadium is required to have a Noise Management Plan in place. The submitted 'Sydney Football Stadium Redevelopment – Draft Noise Management Plan', prepared by Arup, attempts to outline the definition of non-compliance of noise limits for events. Also, the Draft Plan is unclear about what constitutes a breach of the project approval conditions with the number of consecutive exceedances and number of separate occasions.</p> <p>Accordingly, the Noise Management Plan must be finalised prior to determination and must include details that constitute a breach in the noise conditions. The final Plan must also be reviewed on an annual basis.</p>	<ul style="list-style-type: none"> • The definition of a non-compliance with the relevant noise criteria is detailed in Section 3.4 of the Draft Noise Management Plan at Appendix X of the EIS, which confirms the number of consecutive exceedances and the number of separate occasions in relation to the exceedance of the noise limits that constitutes a breach of the conditions. • The Draft Noise Management Plan cannot be finalised prior to the determination of this application as it requires input from the detailed design development of the stadium as part of the construction documentation stage of the project, and requires testing which relies on the operation of the stadium. A review of noise emissions following the commencement of stadium operations is to occur within nine (9) months of commencing operations on the site. This review will inform the final Noise Management Plan in consultation with Consent Authorities, relevant stakeholders and a suitably qualified acoustic consultant. Notwithstanding this, the Department may be minded to impose a condition to further reinforce this obligation. The following is suggested: <i>The Noise Management Plan prepared by Arup (August, 2019), must be updated and issued to the satisfaction of the Secretary prior to the commencement of the use of Sydney Football Stadium including:</i> <ul style="list-style-type: none"> – Hours of operation. – The events that will be deemed to comply and those for which an event acoustic report is required. – The definition of a non-compliance and a breach of conditions. – The chain of responsibility for the management of noise in relation to stadium activities. – Measures to minimise impacts of sound checks rehearsals, 'bump-in' and 'bump-out' activities, goods delivery, post event clean-up activities, and waste collection services (including the noise impact of associated vehicular movements particularly any such movements occurring during the 'night period' or likely to activate reversing alarms, and stadium precinct grounds maintenance; and – A procedure and guidance on the frequency, time of occurrence and duration of pyrotechnic displays, including a community notification strategy.

No.	Extract	Response
		<i>The Final Noise Mitigation Plan, taking into account any additional testing and required changes, will be issued to the satisfaction of the Secretary within nine (9) months of the commencement of operations.</i>
COS25	<p>Construction Noise and Vibration</p> <p>It is anticipated that construction would commence in November 2019 and would take approximately 3 years to complete with the proposed construction works to be carried out in accordance with the following works program:</p> <p>Activity:</p> <ul style="list-style-type: none"> • Earthworks – Duration 6 months • Piling – Duration 7 months • Concrete Structure (stadium bowl) - Duration 18 months • Roof Construction – Duration 18 months • Internal Façade and - Duration 18 months • Fitout Façade – Duration 12 months • External Works – Duration 6 months <p>The construction and traffic noise should not be directly compared as they have different noise profiles. Therefore, a detailed Construction Noise and Vibration Management Plan must be prepared prior to identify the noise associated with the construction and the appropriate measures to mitigate any impacts.</p>	<p>Arup has prepared a draft Construction Noise and Vibration Management Plan at Appendix E of the Noise and Vibration Impact Assessment (see Appendix F of the RTS Report). This report assesses construction and traffic noise, and will be used to inform a final detailed Construction Noise and Vibration Management Plan that will be prepared in conjunction with the appointed contractor. Mitigation Measure CM-NV1 provides for this commitment, and an appropriately worded condition could further reinforce this obligation as follows:</p> <p><i>Prior to the issue of the relevant Construction Certificate, the applicant shall prepare and implement a Construction Noise and Vibration Management Plan. A copy of the plan must be submitted to the Planning Secretary and Certifying Authority.</i></p>
COS26	<p>Noise Policy for Industry – Criteria.</p> <p>Mechanical plant noise was not assessed as part of this application and is subject to further design development during the detailed design stage. This is not acceptable for a Stage 2 development and the general design and sound power level should be known at this stage.</p> <p>Cooling towers and acoustic louvres are proposed to be installed with the assumption that the Noise Policy for Industry (2017) amenity and intrusiveness criteria would be met. However, The City is concerned that this cannot be guaranteed until the type of equipment to be installed has been selected.</p>	<p>Section 4.3.1 of the Noise and Vibration Assessment at Appendix X of the EIS assesses the potential noise emission from mechanical plant, and confirms that the plant is capable of complying subject to further assessment when the detailed plant specifications are known. The specifications cannot be provided at this time and are reliant on the detailed design of the stadium as part of the construction phase of the project with the appointed contractor(s). Noise from indicated cooling towers fall below criteria with standard acoustic treatment.</p> <p>In view of this, the Department may be minded to impose a condition of consent as follows:</p> <p><i>Details of noise mitigation measures for all mechanical plant, cooling towers and the like are to be detailed on the Construction Certificate drawings. Certification from an appropriately qualified acoustic engineer that the proposed measures will achieve compliance with the Noise Policy for Industry and other guidelines applicable to the development must be submitted to the Certifying Authority prior to the issue of the relevant Construction Certificate.</i></p>
COS27	<p>Land Contamination</p> <p>In consideration with the Detailed Environmental Site Investigation (DESI) report and Site Auditor letter submitted with the subject application as well as with Modification 2 – Removal of ground slabs and existing piles (SSD-9249-Mod-2), the site auditor has not confirmed that the site is currently suitable for the ongoing use as a sports stadium as required under Condition No. C24 of the Stage 1 concept development consent.</p> <p>The site auditor considers that the reports have sufficiently characterised the potential contamination status of the site and that a remedial action plan does not need to be developed at this stage of the</p>	<ul style="list-style-type: none"> • The Site Auditor letter at Appendix D confirms that the Auditor cannot verify that the site remains suitable for its intended use at this time, noting that it is not possible to produce a Section A Site Audit Statement until all earthworks are completed and there are no further opportunities for unexpected finds. This Section A statement, or as required a further Interim Audit Advice or Section B statement, will be prepared and issued to the Department in order to satisfy Condition C26 of SSD 9249 when available. It is emphasised that no change is sought to the existing use of the site, and that the requirements of Condition C26 in conjunction with the unexpected finds protocol referenced in Mitigation Measure CM-CON3 will provide the appropriate safeguards, and the Department can be satisfied that the site will be or can be made suitable for its intended use.

No.	Extract	Response
	development. At no point in the letter does the EPA accredited site auditor state that the site is fit for the proposed use. Therefore, it is recommended that clarification sought from the site auditor on the contamination of the site and protocol for unexpected findings prior to determination of the Stage 2 detailed proposal.	<ul style="list-style-type: none"> The Unexpected Contamination Finds Protocol has been prepared and separately reviewed and endorsed by the Site Auditor and is included at Appendix E of the RTS Report. This will be updated, if necessary, and incorporated into the Detailed
COS28	<p>Lighting</p> <p>The public domain lighting for the development has not been adequately considered. Whilst a statement was provided confirming that the development complies with the relevant requirements of Obtrusive Lighting under Australian Standards AS4282, there were no calculations and specifications provided that demonstrate compliance.</p> <p>The stadium and carpark lighting should be sighted and installed to effectively control unwanted effects such as glare on surrounding properties. As such, The City recommends that a condition covering the statutory nuisances from the stadium be imposed.</p>	<p>Lighting is proposed on the site in the form of public domain lighting both for safety and as a design feature, and internal lighting associated with the operation of the stadium such as roof-integrated sports field lighting. The design and operation of external public domain lighting will be subject to further design development as the detailed construction drawings are developed and pursued in accordance with the relevant Australian Standards. The following condition is suggested:</p> <p><i>External Lighting shall comply with AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting. Upon installation of lighting, but before it is finally commissioned, the Applicant shall submit to the Planning Secretary evidence from an independent qualified practitioner demonstrating compliance in accordance with this condition.</i></p>
COS29	<p>Landscape</p> <p>There are inconsistencies with the submitted landscape package and the architectural plans submitted with the application. Specifically, there is conflicting information relating to the details of the Driver Avenue entrance with respect to the number of lifts and the path of travel from the MP1 car park. Additionally, there are discrepancies with the number and extent of flights of stairs at the Driver Avenue entrance to determine if the flight dimensions are acceptable.</p> <p>Further, there is a lack of consideration made to the impacts of new paving and infrastructure to the roots and health of existing trees. Particularly, the concrete pavement proposed over the tree roots of significant trees are within the structural root zone and would have a significant impact on the health of these trees.</p> <p>Inadequate details were provided relating to soil depths, volume, drainage and irrigation of the proposed landscaping elements and trees proposed throughout the development. The landscape proposal fails to demonstrate the feasibility and maintenance of landscaping and longevity.</p>	<ul style="list-style-type: none"> The revised landscape plans and architectural plans prepared for this response to submissions phase address any inconsistencies. The Arboricultural Statement prepared by Tree IQ (Appendix JJ of the EIS) confirms that there is the potential for works, concrete/timber bench seating, seating stairs and associated retaining walls, and mass planting to occur within the Tree Protection Zones (TPZ) of retained trees on the site. It is expected that flexible paving would be installed over tree roots. Tree IQ has accordingly nominated measures to minimise any impacts on the protected trees, which will be implemented when completing works on the site as per Mitigation Measure CM-BIO1. This measure may also inform a condition of consent as follows: <p><i>A Tree Protection Plan is to be prepared prior to the commencement of works on the site by the Project Arborist, assessing the degree of impact to any Tree Protection Zones and providing strategies and mitigation measures for how to minimise or mitigate these impacts. Consideration should be afforded to the recommendations in the Arboricultural Impact Assessment prepared by Tree IQ (May, 2019). Tree 125 and Tree 231 are to be retained and protected.</i></p> <p><i>Tree Protection Zones must be established prior to the commencement of works, and installed and maintained in accordance with the Australian Standard 4970: Protection of Trees on Development Sites. All street trees shall be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, shall be replaced, to the satisfaction of Council.</i></p> <ul style="list-style-type: none"> The revised plans at Appendix C provide further details of the proposed landscaping and public domain elements in the areas surrounding the stadium. These demonstrate that the proposed treatments can be delivered on the site.
COS30	<p>Heritage</p> <p>The Heritage Interpretation Strategy that was submitted with the Stage 2 application should be further developed by the applicant's heritage consultant in consultation with relevant stakeholders and the City. The final Strategy is to be prepared during the Stage 2 construction as part of the detailed design work and implemented prior to occupation of the stadium.</p>	<p>The development of the Heritage Interpretation Plan included at Appendix DD of the EIS is considered in Mitigation Measure DO/-HER1 and DO/-HER2. The following condition is also suggested:</p> <p><i>A Heritage Interpretation Plan shall be prepared in consultation with the City of Sydney Council, the Heritage Council and Office of Environment and Heritage prior to the issue of the relevant Construction Certificate. The Heritage Interpretation Plan must be prepared in accordance with the Sydney Football Stadium Redevelopment Heritage Interpretation Strategy (Curio Projects,</i></p>

No.	Extract	Response
		<i>May 2019). The Applicant must submit the final Plan to the satisfaction of the Planning Secretary prior to the issue of the relevant Construction Certificate. The installation of all heritage interpretation elements within the Heritage Interpretation Plan lodged to satisfy this condition shall occur prior to issue of the final Occupation Certificate.</i>
COS31	<p>Public art</p> <p>The propose public art submission, that forms part of the Public Domain Plan, does not provide adequate details for a public art strategy that the City would typically require to be considered as part of a Preliminary Public Art Plan.</p> <p>The submission omits the proposed method for procuring artists, whether invited or open to expressions of interest. Importantly, it also lacks an indication of how artist's concepts would be integrated into the highly developed design of the public domain or the construction phases of the development.</p> <p>While the art strategy does refer to the potential to reflect on the Indigenous and archaeological heritage of the site, the strategy does not indicate how it will be achieved. For instance, the proposal does not specify how to invite Aboriginal artists to respond to the history of the site or creatively demonstrate how Sydney's water supply relied heavily on water from the site.</p>	<p>Mitigation Measures D/O-PA1, DO/-HER1 and DO/-HER2 provide for the finalisation of the Public Art statement and the procurement of public art in coordination with heritage interpretation for the site. The following condition is also suggested:</p> <p><i>The Applicant must submit a final Public Art Plan to the satisfaction of the Planning Secretary prior to the issue of the relevant Construction Certificate. The Plan is to be prepared in coordination with the Preliminary Public Art Plan prepared by Aspect Studios (June, 2019) and the Heritage Interpretation Strategy prepared by Curio Projects (May, 2019). The installation of all public art within the Public Art Plan lodged to satisfy this condition shall occur prior to issue of the final Occupation Certificate.</i></p>
COS32	<p>Waste</p> <p>The waste service collections and waste storage arrangements must be conducted in accordance with The City's Waste Policy – Local Approvals Policy for Managing Waste in Public Spaces (2017).</p> <p>It is recommended that recyclable material is not to be compacted and consideration should be made to have Return and Earn supplied bins for recyclables that meet the criteria for container deposit schemes. This will increase the opportunities for collecting and recycling a clean stream with minimal contamination. If no Return and Earn bins are provided, consideration should be made to the use of a glass crusher to manage glass containers.</p> <p>No waste is to be presented or stored on the footpath at any time during construction. Commercial tenancies must have a commercial waste contract in place prior to the commencement of the business trading and consideration should be made to the installation of temporary public waste bins during major events to limit litter in the neighbouring residential areas.</p>	<p>The requirement for a waste contractor to be confirmed prior to the operation of commercial tenancies is supported, and the Department may be minded to impose a condition of consent such as the following:</p> <p><i>Prior to the occupation or commencement of the use, whichever is the earlier, the SCSG Trust must ensure that there is a contract with a licensed contractor for the removal of all trade waste. No garbage is to be placed on the public way e.g. the roadways, footpaths, plazas, and reserves at any time.</i></p>

1.3 Waverley Council

No.	Extract	Response
WC1	Loss of existing or potential access to open space in the area, especially through increased parking demand and sporting club use of the existing parks in the area,	<ul style="list-style-type: none"> • The proposed works are contained within the subject site, and do not extend onto surrounding parklands or open space. • The longstanding use of Tramway Oval and other fields by professional sporting codes, such as for Sydney Swans' practice, is not the subject of this DA or under the control of the SCSG Trust. • The proposed development is of a comparable capacity to the former stadium and does not introduce any additional parking demands. Further, the SCSG Trust does not control temporary event parking on Moore Park, which is managed by the CPMP Trust. <p>As such, there will be no change to the level of impact on existing parks in the area.</p>

No.	Extract	Response
WC2	Residential amenity impacts, especially noise, pedestrian and traffic movements and potential anti-social behaviour, as a result of the increased capacity of the stadium as the impact of a 55,000 capacity stadium will be much greater on local amenity than the previous stadium.	<p>It is emphasised that the project involves the replacement of an existing stadium with a new stadium with generally the same patron capacity. The capacity of the stadium has not increased.</p> <p>The impacts of the proposal with regard to noise, pedestrian and traffic movements, and other amenity issues have also been assessed and found to be acceptable and manageable. The operation of the proposed stadium will also be informed by the Anti Social Behaviour Strategy that was developed in consultation with NSW Police.</p>
WC3	Increased traffic congestion arising from the additional size of the facility both during construction and afterwards, especially on major event days. Moore Park Road is the major east west distributor between the eastern suburbs and the southern part of the central CBD and Council is concerned at the impact of increased traffic congestion along this route	<ul style="list-style-type: none"> It is emphasised that the capacity of the stadium has not increased. Arup note that during a busy construction day, the number of heavy vehicles will include 30 concrete trucks, 20 pre-cast steel and structural delivery trucks, and 10 small delivery vehicles. This equates to approximately 10-12 truck movements per hour, which Arup confirms is minimal in the context of the established road network and does not require any modifications or upgrades to the road network. Arup also undertook SIDRA modelling to assess the expected operation of surrounding intersections under the worst-case-scenario when the stadium is operational, being a concurrent event at the SFS and SCG with a maximum 95,000 patrons. The modelling considered the operation of key intersections in Moore Park prior to and following the conclusion of the concurrent event and confirmed that during the worst 30 minute peak hour period, the surrounding intersections would continue to operate at LOS B or C, being acceptable levels of service. LOS B and C are attributed to intersections operating well with spare capacity and some delays. The proposed development will therefore not lead to adverse traffic congestion.
WC4	Presence of major contaminants on the site that will be disturbed through the demolition of the slab of the existing stadium.	<ul style="list-style-type: none"> The Detailed Site Investigation completed by Douglas Partners and submitted at Appendix J of the EIS considered that the site was suitable for its continued use as a sporting stadium without the requirement for remediation. Notwithstanding, Senversa at Appendix D confirms that a Site Audit Statement certifying that the site is suitable cannot be issued until all earthworks are completed on the site and there are no further opportunities for unexpected finds. This Section A statement, or as required a further Interim Audit Advice or Section B statement, will be prepared and issued to the Department in order to satisfy Condition C26 of SSD 9249 when available. It is emphasised that no change is sought to the existing use of the site, and that the requirements of Condition C26 in conjunction with the unexpected finds protocol referenced in Mitigation Measure CM-CON3 will provide the appropriate safeguards, and the Department can be satisfied that the site will be or can be made suitable for its intended use. An Unexpected Contamination Finds Protocol has been prepared and separately reviewed and endorsed by the Site Auditor (see Appendix E), which will be implemented during construction works including the demolition of the slab.
WC5	The need to ensure that the stadium is contained within the building envelope for the site approved by the Minister for planning as part of the Stage 1 DA.	The Architectural Plans prepared by COX Architecture confirm that the proposed stadium is wholly contained within the approved building envelope.
WC6	The need to ensure that the stadium design meets the design excellence provisions and processes of the City of Sydney Local Environment Plan.	The stadium design has adhered to the approved Sydney Football Stadium Design Excellence Strategy and Condition B3 to B9 of SSD 9249. The proposed development has met the relevant design excellence provisions and processes, and it is confirmed in the Competitive Design Alternatives Report at Appendix E and Design Integrity Assessment at Appendix F of the EIS that the

No.	Extract	Response
		<p>development achieves the requirements of the Sydney LEP 2012 and the Stage 1 DA consent and that the proposal exhibits design excellence.</p> <p>The revised plans have been subject to a further assessment by the Design Integrity Panel who confirm that the revised scheme is considered to remain consistent with their review of the design in relation to the Sydney LEP 2012, the objectives of <i>Better Placed</i>, and the project-specific Urban Design Guidelines, and that the revised design does not alter the Panel's conclusion that the proposed development demonstrates design excellence. Refer to Appendix Q of the Response to Submissions Report.</p>

1.4 Randwick City Council

No.	Extract	Response
RCC1	<p>Heritage</p> <p>The Heritage Impact Statement for the proposed Stage Two Sydney Football Stadium Redevelopment site includes detailed recommendations in relation to the interpretive approach to the Historical Archaeology, Busby's Bore, and Aboriginal Cultural heritage archaeology. These recommendations should be included in any determination of the Stage Two Development Application.</p> <p>In addition, the following specific consent condition is recommended:</p> <ul style="list-style-type: none"> A Final Interpretation Plan for the development site is to be prepared to guide interpretation of the history of the site including Aboriginal archaeology, Historical Archaeology, built and landscape heritage and Aboriginal Cultural heritage. The Interpretation Plan is to be based on the Heritage Interpretation Strategy prepared by Curio Projects and is to include interpretive media, locations for interpretive devices, text, images and design details. The Interpretation Plan is to be submitted and approved prior to an occupation certificate being issued for the development. The Interpretation Plan is to be implemented in conjunction with the infrastructure works including the construction of the stadium and surrounding pen space zones. The local Aboriginal community should be consulted on the content and context of the Interpretation Plan. <p>It is noted that the Heritage Impact Statement recommends (page 64) that, as an interpretive strategy, the proposed LED projection surfaces on the stadium's external wall be used as a medium for sharing heritage storylines. Clarification will be needed in the Final Interpretation Plan (which is to be prepared during construction of the stadium) as to how this medium will be used for interpretative purposes in conjunction with other promotional uses related to non-heritage commercial events/branding and themes in a way that respects the interpretive content and storylines</p>	<p>Mitigation Measure D/O-HER1 and D/O-HER2 confirms the requirement to undertake a detailed heritage interpretation plan prior to the occupation of the site, in consultation with the nominated stakeholders. The final updated Mitigation Measures make reference to electronic mediums for heritage interpretation.</p>
RCC2	<p>Landscape and Public Domain</p> <p>The Landscape and Public Domain Strategy provides a comprehensive response to the conditions of the Stage 1 development consent. Council offers the following specific comments in regard to the Landscape and Public Domain Strategy:</p> <ul style="list-style-type: none"> Council is supportive of the proposed robust and sustainable public domain materials. Pedestrian, user amenity and seating must consider the amenity for persons with physical challenges and cultural diversity. 	<ul style="list-style-type: none"> The proposed development has been designed to accommodate a diverse range of users. Seating within the site has been revised in the amended plans by Aspect Studios to accommodate seating for persons with physical challenges. The stadium and public domain design has been reviewed by Intelligent Risks in consultation with the NSW Police. HVM measures have been incorporated into the design of the public domain, including utilising specially designed furniture, bollards, and custom bollards. These elements may continue to be developed as the proposal is translated into detailed construction drawings in consultation with Intelligent Risks and relevant stakeholders.

No.	Extract	Response
	<ul style="list-style-type: none"> Consideration of counter terrorism mitigation measures should be incorporated in the stadium circulation and public domain design. Access appears to only consider issues of gradient. Consideration must be given for persons with other disabilities such as poor vision and hearing. Council supports the tree retention/replacement ratio as a minimum for the loss of trees as a consequence of stadium development. 	<ul style="list-style-type: none"> In addition to creating accessible and compliant paths of travel around the stadium, the detailed design of the public domain will accommodate tactile markers, such as at the top and bottom of stairs. The revised Landscape Plans at Appendix C incorporate planting at the top of all seating terraces.
RCC3	<p>Traffic and Transport</p> <p>Council notes in the proposal's traffic/transport analysis that the development will have no proposed increase in attendees and the number of events, and that a new public transport mode will be in operation by the time of completion. It is considered that the following recommendations should be included any determination of the SSD application to further enhance the transport provisions of this proposal:</p> <ul style="list-style-type: none"> Additional 'on-ground' bike parking is to be provided for staff close to where the 'wallmounted' bike parking is proposed. Some persons find that manoeuvring a bicycle in to wall mounted racks is very challenging. This applies particularly to persons who may not be so tall or so strong. Access to bike parking should be available to people of all capabilities. Transport for NSW must be mandated to accept Integrated Transport Ticketing for EVERY event held at the SFS and the SCG - so as to reduce the likelihood of private vehicles being driven to the venue/s. This is for the benefit of the local communities and for the greater good of the wider Sydney area. Specific share bike and share e-scooter parking corrals must be created in the environs of the SFS and the SCG to support those who ride from, say, Redfern, Green Square, Central or Bondi Junction transport nodes. Having such corrals also provides surety for 'return trip users'. Strong consideration is to be given to a simple access, drop-off / pick up, parking bay dedicated to future self-driving vehicles. This is required as self-driving cars are most likely (especially initially) to require predetermined simple pickup and drop-off points, so the car can always pull over safely and legally. This parking bay could, perhaps, be located behind the proposed coach parking area on Moore Park Road. 	<ul style="list-style-type: none"> The proposed staff bicycle parking has been relocated to a secure location beneath the stairs of the MP1 carpark. The detailed design of this parking may incorporate on ground bicycle parking where appropriate. Integrated ticketing is subject to discussions between individual clubs and TfNSW, and currently applies to all NSW Waratahs and Sydney FC games. Other codes are required to negotiate the terms of integrated ticketing directly with TfNSW, noting that these negotiations are outside of the direct control of the SCSG Trust. 45 racks (90 parking spaces) are to be installed in the public domain surrounding the stadium, and an additional 30 racks (60 parking spaces) will be explored in consultation with the CPMP Trust, which will be accessible at all hours by the general public. These racks can be used for hire bikes or scooters also used to access the site. Further opportunities for taxis and rideshare services have been explored in the Transport Assessment prepared by Arup that accompanied the EIS at Appendix H. These include opportunities for pick up/drop off using the northern kerbside of Moore Park Road, and the southern kerbside of Moore Park Road, which operate as clearways during events and informally for taxis and rideshare vehicles at other times. An existing 'no-stopping' zone on the northern kerbside of Lang Road between the Equestrian Centre and Cook Road has also been identified by TfNSW as a potential drop off and pick up zone. These zones may be pursued separately in consultation with key stakeholders, and would be capable of accommodating driverless vehicles in the future.
RCC4	<p>Acoustic Amenity</p> <p>The acoustic report provided by ARUP (dated 31 May 2019) addresses noise and provides recommendations to ensure compliance with relevant noise criteria. Noise validation is proposed post operation up front, which assess the noise impacts and emissions from the proposed sports stadium facility in accordance with the relevant guidelines and established noise limits. Noise validation is recommended to occur during rehearsal stage of all future concerts to ensure noise limits are complied with.</p> <p>Council notes that the Noise Management Plan for future operations has been provided as a part of the application. This document must evolve post operation stage based on the amenity impacts and any future required amendments must be complied with.</p> <p>Proposed future concert numbers should be aligned with established number measures to ensure compliance with the relevant conditions of approval.</p>	<p>The review mechanisms for the ongoing refinement of the Noise Management Plan are detailed in Section 5 of the Plan. An annual monitoring system validation using attended monitoring shall be included in the final NMP requirements. This commitment is reflected in the Mitigation Measures, and an appropriately worded condition of consent could further reinforce this obligation.</p>

No.	Extract	Response
	Noise validation is recommended post operation and prior to all future concerts to ensure established noise limits are complied with.	
RCC5	<p>Contamination</p> <p>SEPP 55 requires all planning authorities to consider contamination and whether the site is suitable for the intended use.</p> <p>A Site Auditor from Senversa has reviewed contamination reports provided by Douglas and Partners and has provided recommended measures in section 5.2 of letter dated 12 June 2019. These recommendations should be fully complied with. Based on advice from Douglas and Partners the site has been considered as being suitable for the intended use provided recommendations detailed in contamination reports are incorporated in relevant plans during construction works.</p>	Noted, no further action required.
RCC6	<p>Ecologically Sustainable Development and Resilience to Climate Change</p> <p>The Environmental Impact Statement (EIS) states that a key driver in the detailed design, construction and operation of the stadium is the achievement of best practice ESD targets to minimise the consumption of resources and guide sustainable operation in the future.</p> <p>In this regard, the ESD report indicates that this has not been achieved to date as the Leadership in Energy and Environmental Design (LEED) Gold rating target identified in the report is not confirmed at this stage. Being a new stadium in a major city, Council recommends consideration of a Platinum rating under LEED.</p> <p>A minimum LEED Gold standard and its required ESD points should be confirmed prior to consent being granted.</p>	<p>The Environmentally Sustainable Design Strategy prepared by LCI confirms that the proposed development is capable of achieving a LEED Gold rating, which will be attained through the detailed design and intended operation of the stadium. Accordingly, certification is not possible at this preliminary stage prior to the detailed design and construction of the stadium.</p> <p>The achievement of LEED Gold rating is per Condition C30 and the Mitigation Measure CP-ESD1 of the approved Concept Proposal that this application is pursuant to.</p>
RCC7	<p>Renewable Energy</p> <p>The proposed development proposes photovoltaic cells to be applied to areas of the roof that will enable the stadium to capture just enough energy to support day-time operations. A zone indicating the location that photovoltaic cells can be best integrated with the stadium roof is indicated on the plans. It should be noted, however, that no commitment is made to the final capacity and location of these photovoltaic cells within the application.</p> <p>The ESD Strategy indicates that the proposed photovoltaic system only meets a third of the LEED Renewable Energy Production (EA123) score points available for this credit. Given the size of the roof, the photovoltaic system should be sized to offset day-time and night-time operations.</p>	LCI has advised that a 350kWp PV system would be sufficient to serve the stadium and achieve NCC 2019 Section J compliance (the generated renewable energy is used to offset the stadium's greenhouse gas emission), as well as achieve certain credits within the LEED rating tool (Renewable Energy Production, Optimise Energy Performance & Regional Priority). A 350kWp PV system would need approximately 2,500m ² of roof area (as shown in the Architectural Plans at Appendix B).
RCC8	<p>Water Sensitive Urban Design</p> <p>To utilise rainwater harvested from the stadium for irrigation the proposed development proposes a rainwater tank. However, as stated within the ESD strategy, the size and location of the rainwater tank will be confirmed during the detailed design stage. Details such as these should be included within this application. The limited WSUD response to rainwater harvesting and reuse is considered an inadequate response for a new development of this scale and significance. Given this, the following WSUD measures should be further investigated:</p> <ul style="list-style-type: none"> The proposal should provide an increase in permeable surfaces especially in respect to the reinstatement of the existing paved areas and the proposed Moore Park Carpark 1 providing 540 at grade car parking spaces. 	<ul style="list-style-type: none"> The proposed development seeks to install two new 150kL rainwater tanks in the northern and southern ends of the stadium, for reuse in toilet flushing and other incidental uses such as site maintenance. Irrigation will continue to use bore water, consistent with the existing water extraction licence 24543 which permits 20 ML of water to be extracted from the Botany Sands aquifer via a bore located within the SCG grounds for playing field irrigation across the SFS and SCG. The size, location and design of the proposed rainwater tanks is detailed in the Stormwater Management Plan at Appendix P of the EIS. The MUSIC modelling completed by Aurecon on the Stormwater Management Plan at Appendix P of the EIS demonstrates that the proposed WSUD measures will enable the proposed development to comply with the identified water quality improvement targets for the project. In addition, the following is noted:

No.	Extract	Response
	<ul style="list-style-type: none"> Groundwater recharge through stormwater infiltration systems such as swales and raingardens should also be included to offset the impacts of the proposed development and improve the aesthetics of the sports stadium facility. Installation of additional landscaped areas to offset impacts of the facility such as green walls and roofs should also be incorporated into the design. There are principles to manage flooding as outlined in the Executive Summary of the Stormwater Management Plan. The before and after flood maps show only very localised changes to flood depth and hazard in the very close immediate proximity to the stadium itself. No downstream impacts are evident. 	<ul style="list-style-type: none"> The extent and material of paving used on the site is commensurate with what is required to accommodate the egress of up to 55,000 patrons from the stadium and provide a robust and durable public domain. The site is also bordered by Moore Park which provides extensive permeable areas. DRAINS modelling completed by Aurecon confirms that the controlled discharge flow from the site will adhere to Council's DCP Drainage and Stormwater Management guidelines, and as such additional measures are not required in this instance. The addendum assessment prepared by Aurecon at Appendix N confirms that some passive irrigation outside of the circulation zone surrounding the stadium have been incorporated via the garden beds which capture rainwater run-off and direct the run-off into strata-vaults. These strata-vaults passively irrigate tree roots. An overflow system drains into the conventional in-ground stormwater system. Noting that flood impacts are localised and not substantially changed as a result of the proposed development, Aurecon have also provided preliminary details on flood evacuation from the site in the event of an emergency at Appendix N of this report. Mitigation Measure D/O-FL1 provides that the detailed emergency evacuation plan with consideration of this preliminary work will be prepared prior to the commencement of stadium operations to detail flood evacuation routes from the stadium site.

1.5 Former Office of Environment and Heritage

No.	Extract	Response
OEH1	Please note that former OEH do not have any additional comments with regard to this proposal.	Noted, no action required.

1.6 Heritage Community Engagement, Department of Premier and Cabinet (Heritage Council of NSW)

No.	Extract	Response
HC1	<p>Engineering Heritage</p> <p>Busby's bore is the key SHR listed item that runs underneath the subject area. The exact location of this engineering heritage item of State significance was sought as part of the Stage 1 SSD comments. Clear guidance on what would be required to guide the Stage 2 investigations, including to understand the exact location of the bore in relation to the proposed SFS works was recommended.</p> <p>Table 1.3 (CP-HER2) of the supporting SOHI identifies the need for further investigative works for the Bore's location. This is outlined in a series of mitigation measures attached to the conditions of consent for SSD 9249 - Stage 1 of the Sydney Football Stadium (SFS) which allowed concept approval, early-works and demolition of the SFS redevelopment.</p> <p>The SOHI goes on to identify in Table 2.3 under (Compliance with Busby's Bore Draft CMP Policies) that the location of Busby's Bore has been inconclusive in identifying in confirming the alignment of Busby's bore within the subject site. However, the table goes on to state:</p> <p><i>'it is believed that the development will have no impact to the heritage items due to the depth of the bore in comparison to the development impacts – which will not [extend] to the depth of the bore), and mitigation measures have been introduced to monitor this both structurally (e.g. vibration sensors</i></p>	Noted, no action required.

No.	Extract	Response
	<p><i>installed within Shaft 10), as well as archaeologically (Targeted monitoring of construction works in the vicinity of the bore)'.</i></p> <p>Further advice in this document has provided greater clarity on the above statements, identifying the investigation in 2019 in an area of a potential additional shaft removed over 10 tonnes of 20th century building rubble and was unable to reach to top of the bore. The result of this investigation indicates the horizontal bore is located at a depth of 12m below the existing ground level. On this basis, the Assessment has advised Busby's Bore will not be directly impacted by the SSD stage 2 development as the excavation required for this work will be less than 12m. To ensure this a condition is recommended to DPE to require excavation below 12m is not approved, unless further evidence to confirm the location and depth of the Bore is provided to clarify this impact and its avoidance.</p> <p>Two of the bore shafts have been identified (Shafts 9 and 10) which are located in the north-east of the subject site. It is proposed to protect these known shafts during the works. A level of monitoring is proposed in the vicinity of the bore to ensure its protection during these excavation works.</p>	
HC2	<p>Historical Archaeology</p> <p>Historical Archaeological investigation is proposed in areas where archaeological potential for relics of Local significance which require management coincides with bulk-excavation. Other activities will involve adding fill to the site, which is likely to protect these deposits and piling which has been identified as being in so limited an area that prior or concurrent archaeological investigation is unlikely to provide meaningful results and is not recommended. These areas of management are shown in Figure 7.20 of the 'Heritage Impact Statement and Archaeology Research Design and Excavation Methodology' prepared by curio projects dated May 2019'.</p>	Noted, no action required.
HC3	<p>Recommendations</p> <p>To manage the potential adverse impacts to built heritage and archaeological relics within the study area, the following conditions are recommended:</p> <ol style="list-style-type: none"> 1. The historical archaeological investigation (monitoring and salvage) for the Sydney Football Stadium Stage 2 works shall be undertaken in accordance with the report entitled 'Heritage Impact Statement and Archaeology Research Design and Excavation Methodology' prepared by curio projects dated May 2019'. 2. The archaeological program shall be directed by a suitably qualified and experienced historical archaeologist who can fulfil the requirements of the Heritage Council of NSW Excavation Director criteria at a state level of monitoring and testing to identify and protect Busby's Bore. This person shall be responsible for managing the historical archaeological works under this SSD approval. 3. At the completion of the archaeological program, the Proponent shall ensure a final excavation report (including all site records and detailed artefact analysis) is prepared and submitted to the Department of Planning, Industry and Environment, the Heritage Council of NSW and the City of Sydney local studies library. This will ensure the results of the archaeological program are clearly explained to the public and accessible. The Proponent shall identify where the location of archaeological relics recovered from the archaeological program will be retained and conserved in perpetuity in this final report. 4. Nothing in this approval allows the removal of, or damage to, Busby's Bore. 5. Ongoing vibration monitoring is required during the SSD excavation works within Shafts 9 and 10. Vibrations should be limited to a maximum peak particle velocity of 5 mm/s. 	The proposed conditions of consent are acceptable.

No.	Extract	Response
	<p>6. An Interpretation Plan for the SFS shall be prepared in consultation with a nominated heritage consultant and must include the results of investigation into Busby's Bore & its shafts and the results of the historical and Aboriginal archaeological investigations undertaken for this SSD project. This Plan should be a comprehensive document that proposes specific methods to understand, interpret and present the significance of the SCG and surrounding heritage items.</p> <p>7. This Interpretation plan must be implemented prior to occupation certificate being issued.</p>	

1.7 Transport for NSW

No.	Extract	Response
	Event Traffic and Transport Management	
TNSW1	<p>The Transport Assessment prepared to support the development application states the following:</p> <p><i>"The travel demands forecast are based on available capacities of various transport modes in the hour prior to the start of the event - noting that the data collection as part of this study determined that approximately 70% of people arrive in the hour prior to the start of the event. Should the start times for the double header event be staggered, the light rail mode share has the capacity to increase from that stated."</i></p> <p>Section 2.2.2 of the Environmental Impact Assessment states the following:</p> <p><i>"For special events (e.g. large concurrent events at the SCG and SFS with crowds totalling over 45,000), the light rail will have the capacity to transport approximately 14,000 passengers per hour to and from Moore Park"</i></p> <p>It is advised that the light rail is expected to run with 7,200 passengers per hour for bump in (to) and 10,800 passengers per hour for bump out (from) Moore Park.</p> <p>It is also noted that sections 4.1 and 6.6.2 of the Transport Assessment state the following for the Double Header with concurrent start time (full event at both Sydney Cricket Ground and Sydney Football Stadium) that:</p> <ul style="list-style-type: none"> Estimated crowd for large concurrent events at the SCG and SFS is 95,000; and The operation of the stadium will significantly increase pedestrian activity in the precinct as it is estimated that around 39,000 spectators arrive and leave the site by walk ("Walk Only" and "Train to Central & Walk"). <p>It is also noted that the Event Management Plan prepared to support the development application considers pedestrian and vehicle access into the redeveloped stadium however does not identify how traffic and transport would be safely and efficiently managed during events.</p> <p>Recommendation</p> <p>It is requested that the applicant undertake the following as part of the Response to Submissions:</p> <ul style="list-style-type: none"> Confirmation of the following: <ul style="list-style-type: none"> 7,200 passengers per hour for bump in (to) and 10,800 passengers per hour for bump out (from) Moore Park have been adopted for the transport assessment in Sections 4.1 and 6.6.2; and 	<p>This is addressed in the response prepared by JMT at Appendix J, which is summarised as:</p> <ul style="list-style-type: none"> As noted in Section 7.3 (Table 9) of the Transport Assessment at Appendix H of the EIS, the assessment has adopted a light rail capacity of 7,200 passengers per hour for bump in (to) and 10,800 passengers per hour for bump out (from) Moore Park. The Event Management Plan Prepared at Appendix Q of the EIS is applicable for double headers with concurrent start times and 95,000 spectators. In the event of major double headers, a bespoke Transport Management Plan is prepared in conjunction with key stakeholders such as the Transport Management Centre and NSW Police. During consultation with TfNSW in August 2019 it was requested that an event traffic and transport management plan (ETTMP) be prepared for the redeveloped SFS. TNSW indicated that it has only just commenced preparing a broader Moore Park Traffic and Transport Management Plan, and does not anticipate it being finalised prior to the Response to Submissions period concluding. It was consequently agreed in principle with TNSW that the ETTMP should be the subject of an appropriately worded condition of consent. The ETTMP will include measures in place for various event types (eg. concerts, major events, double headers) including specific details of pedestrian management during double headers (as requested in the TfNSW response letter). Following advice from TfNSW, the forecast mode share for events at the SFS has been updated which considers the appropriate allocation of special event buses running prior to the start of concerts (noting they will be provided by TNSW depending on the concert/event type) and the number of people driving to a concert with that driving to a major double header. The updated mode share assumptions are provided at Appendix J.

No.	Extract	Response
	<ul style="list-style-type: none"> - The Event Management Plan is applicable for the Double Header with concurrent start time (full event at both SCG and SFS) with 95,000 spectators. • The following details need to be provided for the Double Header with concurrent start time (full event at both SCG and SFS) event: <ul style="list-style-type: none"> - Pedestrian management measures for around 39,000 spectators estimated to arrive and leave the site by walk; and - Pedestrian safety measures to minimise conflicts with other modes of transport. • Consult with TfNSW and the relevant stakeholders to prepare an Event Traffic and Transport Management Plan for the operation of the redeveloped stadium to address the safe and efficient management of event traffic and transport. The plan should incorporate the proposed development, including its infrastructure and operation, and the planned traffic and transport infrastructure improvements in the Moore Park Precinct. It is advised that the plan should align with the Moore Park Traffic and Transport Management Plan. 	
	Pedestrian Access and Circulation	
TNSW2	<p>It is noted the Transport Assessment states the following:</p> <p>"In additional pathway is being investigated in Moore Park West which links the Driver A venue access stairs with the path to the Tibby Cotter Bridge - promoting this route of travel to/from Central Station."</p> <p>It is advised that this pathway is likely to become the principal pathway used between the Albert Tibby Cotter Bridge and the redeveloped stadium.</p> <p>Recommendation</p> <p>It is requested that the proponent undertake the following as part of the Response to Submissions:</p> <ul style="list-style-type: none"> • A pedestrian route capacity assessment of the potential pathway between the Albert Tibby Cotter Bridge and the redeveloped stadium to ensure that its design could accommodate the forecast worst-case scenario pedestrian demand and provide confirmation that the design could achieve this; and • If possible, provide detailed design plans of the pathway and confirm if the pathway is to be delivered as part of the proposed development. 	<p>Infrastructure NSW is committed to working with CPMP Trust to consider better pedestrian links between the Tibby Cotter Bridge and the stadium, around Kippax Lake. This link was envisaged in the adopted <i>Sydney Football stadium Urban Design Guidelines</i> and will be discussed with the CPMP Trust. At a recent CCC meeting, Infrastructure NSW was advised that the new link could take the form of intuitive design through planting or other mechanisms rather than a typical hardstand path. The design of potential upgrades is, therefore, being worked through as part of a separate process. This commitment has been included in the updated Mitigation Measures to progress consultation with the CPMP Trust regarding this link, noting that it would not be within Infrastructure NSW and/or the SCGS Trust's jurisdiction to obtain the necessary development approvals.</p>
	Passenger Pick-up and Drop-off Facilities	
TNSW3	<p>It is noted that the Transport Assessment identifies passenger pick-up and drop-off facilities for point to point transport and coaches to support the proposed development following consultation with TfNSW.</p> <p>Recommendation</p> <p>It is requested that the proponent consult further with TfNSW to provide adequate passenger pick-up and drop-off and layover facilities for point to point transport and coaches for the development as part of the Response to Submissions.</p>	<p>The proponent met with TfNSW on 2 August 2019 to discuss the issues raised in the RTS, including passenger pick-up and drop-off facilities for point to point transport and coaches. The outcomes of this meeting are detailed in the response at Appendix J. It is emphasised that potential works that are external to the site to accommodate these modes will be subject to further consultation with the relevant stakeholders and will be pursued as part of a separate stage of the project.</p>

No.	Extract	Response
	Driver Avenue Carpark	
TNSW4	<p>It is noted that the proposed development includes the reinstatement of the MP1 carpark, which includes enhanced vehicle rejection facilities. However, limited information has been provided in the Transport Assessment in regard to the design and operation of the reinstated MP1 carpark.</p> <p>Recommendation</p> <p>It is requested that the applicant provides the following as part the Response to Submissions:</p> <ul style="list-style-type: none"> The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004 and AS2890.6-2009; and Detailed design, in particular the enhanced vehicle rejection facilities, of the car park. 	<p>The detailed design of the car park and driveways, including adherence with the relevant Australian Standards will be confirmed at the detailed construction drawing phase of the project. If the Department is minded to impose a condition to this effect, the following is suggested:</p> <p><i>Plans shall be submitted to the satisfaction of the Certifying Authority prior the issue of the issue of the relevant Construction Certificate demonstrating parking associated with the proposal (including driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) is in accordance with AS 2890.1-2004, AS/NZS 2890.6:2009 and AS 2890.2-2002.</i></p>
	Wayfinding and Signage	
TNSW5	<p>It is noted that the Wayfinding and Signage Strategy prepared to support the development application states the following:</p> <p><i>"It is generally agreed that additional signage designed for stadium egress (i.e. large and illuminated) would only serve for a small window of time post an event, which is not the case during the majority of the year. Instead it is considered more appropriate to assist people in planning their journey (both to and from the stadium) prior to attendance at an event. The Green Travel Plan proposed for the project proposed a travel access guide be provided to patrons at the point of sale of the ticket."</i></p> <p>It is advised that the wayfinding signage between transport nodes and the site should include the following attributes to support the safe and efficient movement of high numbers of pedestrians:</p> <ul style="list-style-type: none"> Located at key decision points; Illuminated to be usable at night; Sufficiently sized to be visible from a distance; and Positioned at a high level to maintain sight clearance. <p>Recommendation</p> <p>It is requested that the proponent consult with TfNSW to provide adequate wayfinding signage for the development to support the safe and efficient movement of high numbers of pedestrians as part of the Response to Submissions.</p>	<p>A meeting was held with TfNSW staff on 2 August 2019 at which signage and wayfinding was discussed. At this meeting it was agreed that further consideration of wayfinding and signage to support the development is required within the project site boundary of the SFS and more broadly within the Moore Park precinct and outside the project site boundary. This item will be considered in more detail (following consultation with key stakeholders) as part of the development of the Moore Park Traffic and Transport Management Plan being led by TfNSW. At the meeting, TfNSW indicated that signage and wayfinding is not required to be fully resolved as part of the Response to Submissions phase of the project. The Mitigation Measures have been updated to reflect the commitment to work with TfNSW in the development of the Moore Park Traffic and Transport Management Plan (see Mitigation Measure D/O-TA4). A suitably worded condition of consent could further reinforce this commitment if considered appropriate.</p>
	Security and Emergency Management	
TNSW6	<p>It is noted that the following documentation has been prepared to support the development application:</p> <ul style="list-style-type: none"> Security Risk Assessment; Crime Prevention Through Environmental Design (CPTED) report; and Anti-Social Behaviour Strategy. <p>It is advised that TfNSW has been consulted by the proponent regarding security within the proposed development and requests it be further consulted in respect to the above documentation.</p>	<p>The CPTED assessment and Anti-Social Behaviour Strategy included with the EIS do not address any transport issues and will not be subject to further refinement, and as such it is considered unnecessary to liaise with TfNSW with regard to these documents. Notwithstanding, feedback (via email) received on 13 August 2019 from TfNSW noted that they had reviewed the Security Risk Assessment Strategy report and had no issues to raise with the content or the approach taken. The TfNSW security team will continue to be consulted as the project moves through the detailed design phase, particularly in relation to design measures proposed for hostile vehicle mitigation.</p>

No.	Extract	Response
	<p>Further, it is noted that the Event Management Strategy prepared to support the development application discusses emergency management for the proposed development and states that the existing Emergency Management Plan in operation for the precinct would be updated to include the redeveloped stadium. It is advised that TfNSW and the Sydney Metropolitan Regional Emergency Management Committee should be consulted during the update of the plan.</p> <p>Recommendation</p> <p>It is requested that the proponent undertake the following as part of the Response to Submissions:</p> <ul style="list-style-type: none"> Consult further with TfNSW in respect to the following documentation and consider any advice provided: <ul style="list-style-type: none"> Security Risk Assessment; Crime Prevention Through Environmental Design (CPTED) report; and Anti-Social Behaviour Strategy. Consult with TfNSW and the Sydney Metropolitan Regional Emergency Management Committee on the proposed update of the Emergency Management Plan. 	<p>The CPTED assessment has also been subject to a peer review by Intelligent Risks, which validates the findings of the CPTED report and confirms that the proposed development has generally achieved the principles of CPTED and as such will result in an appropriate design outcome for the site. Refer to Appendix O.</p>
	Travel Demand Management Strategy and Green Travel Plan	
TNSW7	<p>It is noted that the Transport Assessment includes a Green Travel Plan for the proposed development however does not include a Travel Demand Management Strategy.</p> <p>It is advised that a Travel Demand Management Strategy is required to increase the mode share of public transport and active transport for the development, including through initiatives such as integrated ticketing between events and transport providers.</p> <p>Recommendation</p> <p>It is requested that the proponent consult with TfNSW and the relevant stakeholders and prepare a Travel Demand Management Strategy to increase the mode share of public transport and active transport for the development as part of the Response to Submissions.</p>	<p>As outlined in the response at Appendix J, a meeting was held with the TfNSW on 2 August 2019 at which the Green Travel Plan submitted at Appendix H of the EIS was discussed. It was noted and acknowledged that a suite of measures to increase the public and active transport was already contained in the Green Travel Plan as submitted. The Green Travel Plan will be reviewed and updated periodically in line with the monitoring mechanisms outlined in the document and to reflect contemporary operating procedures in consultation with TfNSW and other stakeholders. It will also be updated to align with any required Event Traffic and Transport Management Plan prepared for the development. The Mitigation Measures have been updated to make this commitment clear, and a suitably worded condition of consent could be imposed to reinforce this arrangement.</p>
	Active Transport	
TNSW8	<p>It is noted that limited information is provided in the Transport Assessment regarding bicycle parking and end of trip facilities.</p> <p>Recommendation</p> <p>It is requested that consideration be given to providing bicycle parking facilities either within the development or close to it, to support and encourage active transport to the site.</p>	<p>Bicycle parking is proposed to be delivered on the site for both staff and members of the general public. This includes the provision of 45 racks (90 bicycle parking spaces) for the general public near the site frontage to Moore Park Road and the new dedicated cycle lane being delivered by City of Sydney Council along this road. A further 50 secure bicycle parking spaces are to be provided beneath the MP1 stairs for use by permanent staff. These measures, in addition to the initiatives identified in the Green Travel Plan, will promote the use of active transport when travelling to and from the site.</p> <p>Additional general public parking external to the site is to be explored in consultation with the CPMP Trust as part of a separate exercise and in the context of all other initiatives required to be finalised for the CPMP Trust land (including wayfinding and the pedestrian link/connection around Kippax Lake).</p>

No.	Extract	Response
	Bus Services and Facilities	
TNSW9	<p>It is noted that the role of the existing regular bus network on the Anzac Parade/busway is briefly mentioned in the Transport Assessment. However, the details of bus stop and route information are either incomplete or inaccurate in the map of streets used by regular/individual bus services (p60 and p77) and the Amended Moore Park Precinct Operations Plan (Fig 19 and p44). The details are provided below:</p> <ul style="list-style-type: none"> Route 333 on Oxford Street is not mentioned and Route 380 has been withdrawn from the road as of September 2018; and Stops in the busway at the Lang Road intersection and Route 355 stops in Lang Road are not shown. By contrast the map of key pedestrian routes on p19 (Fig 5) shows the stops on Anzac Parade at the Lang Road intersection. Stops are also shown on the busway near this location but they are not referred to in the text. <p>Recommendation</p> <p>It is requested that the applicant amends the Transport Assessment to include accurate details of bus stop and bus services.</p>	<p>Following advice from TfNSW, details around bus stops and services which reflect the current situation have been provided in Appendix J.</p>
	Construction Pedestrian and Traffic Management	
TNSW10	<p>Several construction projects, including the Sydney Light Rail Project, are likely to occur at the same time as this development. The cumulative increase in construction vehicle movements from these projects could have the potential to impact on general traffic and bus operations in the vicinity of the Moore Park precinct, as well as the safety of pedestrians and cyclists particularly during commuter peak periods.</p> <p>Recommendation</p> <p>It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW and the Sydney Light Rail Operator and submit a copy of the final CPTMP plan to the Coordinator General, Transport Coordination for endorsement, prior to the issue of any construction certificate.</p>	<p>The Transport Assessment prepared by Arup and accompanying the EIS at Appendix H noted that the vast majority of construction works associated with the Light Rail will be completed by the time construction works associated with the SFS redevelopment commence on site. Most of the activity that will coincide with construction works for the stadium and prior to the opening of the Light Rail will be focussed on testing and commissioning rather than significant construction related activities. This ensures that the construction works on the site have limited potential to overlap with intensive construction works for the Light Rail. Further, the nominated routes for construction vehicles accessing the site do not coincide with those used by the Light Rail project, which are focussed on Anzac Parade and the Eastern Distributor (Randwick) entry/exit.</p> <p>Notwithstanding this, the preparation of a detailed Construction Pedestrian and Traffic Management Plan prior to the commencement of works on the site will be completed in consultation with TfNSW and Sydney Light Rail. The suggested condition below is considered appropriate for this requirement.</p>
	Suggested Conditions of Consent	
TNSW11	<p>Construction Pedestrian and Traffic Management</p> <p>Prior to the issue of any construction certificate, the applicant shall:</p> <ul style="list-style-type: none"> Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW and the Sydney Light Rail Operator. The CPTMP needs to ensure that the construction of the development does not in any way adversely impact the Sydney Light Rail Project. The CPTMP needs to specify matters including, but not limited to, the following: <ul style="list-style-type: none"> A description of the development; Location of any proposed work zone(s); 	<p>This suggested condition is acceptable.</p>

No.	Extract	Response
	<ul style="list-style-type: none"> - Details of crane arrangements including location of any crane(s) and crane movement plan; - Haulage routes; - Construction vehicle access arrangements including vehicle access/crane access and in or around the light rail; - Proposed construction hours; - Predicted number of construction vehicle movements and detail of vehicle types, noting that vehicle movements are to be minimised during peak periods; - Construction program and construction methodology; - Consultation strategy for liaison with surrounding stakeholders, including other developments under construction and the Sydney Light Rail Operator; - Details of measures to avoid construction worker vehicle movements within the vicinity of the precinct, including any off-site worker parking location/s away from the precinct; - Any potential impacts to general traffic, cyclists, pedestrians and light rail and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works; - Cumulative construction impacts of projects including Sydney Light Rail Project. Existing CPTMPs for developments within or around the development site should be referenced in the CPTMP to ensure that coordination of work activities are managed to minimise impacts on the surrounding road network; and - Proposed mitigation measures. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP. <ul style="list-style-type: none"> • Submit a copy of the final plan to the Coordinator General, Transport Coordination within TfNSW for endorsement; • Construction works shall not be undertaken for at least two hours prior to an event, during an event and two hours post an event, to minimise the risk of pedestrian and construction vehicle conflicts, without prior approval of the Sydney Coordination Office and Transport Management Centre within TfNSW. • Provide the builder's direct contact number to small businesses adjoining or impacted by the construction work and the Transport Management Centre and Sydney Coordination Office within Transport for NSW to resolve issues relating to traffic, public transport, freight, servicing and pedestrian access during construction in real time. The applicant is responsible for ensuring the builder's direct contact number is current during any stage of construction. 	

1.8 Botanic Gardens and Centennial Parklands (Centennial Park and Moore Park Trust)

No.	Extract	Response
CPMP1	The Centennial Park and Moore Park Trust (the Trust) is making this submission in response to the public exhibition of the application for Stage 2 of a State Significant Development (SSD), being for the	Noted, no further action required. Refer to the discussion below on the key issues raised.

No.	Extract	Response
	<p>detailed design, construction and operation of the Sydney Football Stadium (SFS), proposed by Infrastructure NSW (Infrastructure NSW).</p> <p>With reference to the exhibited Environmental Impact Statement (EIS) and associated documentation for this Stage 2 application, the Trust makes the following comments and recommendations - including raising a number of concerns - which in the Trust's view should be addressed during the detailed assessment of the SSD application and prior to any consent.</p> <p>The Trust appreciates the project has achieved Stage 1 SSD approval and has commenced site establishment and demolition of the existing stadium. While the Stage 2 project therefore has the in-principle support of the NSW Government, and while review of the application indicates the architectural and landscape architectural design of the project generally demonstrates excellence, the Trust is concerned for the successful integration of the project within the parklands, and for aspects of its operation. These issues are discussed in detail throughout the submission.</p> <p>This submission is structured against concerns emerging from key documents submitted in support of the SSD proposal, namely the Urban Design Report, Architectural Design Statement, Landscape and Public Domain Statement, Transport Assessment, Construction Management Plan, Security Statement, Operational Waste Management Strategy and Infrastructure Management Plan.</p>	
	Urban Design Report	
CPMP2	<p>Connecting Pedestrian Infrastructure and Wayfinding</p> <p>While the Trust appreciates the project application focuses on land controlled by the Sydney Cricket and Sports Ground Trust, the majority of people accessing the new SFS venue will arrive at the precinct after crossing land controlled by the Centennial Park and Moore Park Trust -specifically, Moore Park West, Moore Park East, and from Entertainment Quarter.</p> <p>Without critical linkages, lighting, wayfinding and other pedestrian infrastructure designed, coordinated and implemented as part of the SFS proposal, the new stadium risks being disconnected from pedestrian and public transport networks.</p> <p>The Urban Design Report highlights the need to link the SFS redevelopment to recent and ongoing projects in Moore Park -the Tibby Cotter Bridge, the new CBD and Southeast Light Rail stop and the recently modified bus loop. However, the SSD proposal stops short of making any commitment to the design or delivery of these links.</p> <p>Existing footpaths and wayfinding in the area is currently inadequate and does not anticipate the foot traffic generated by the Moore Park Light Rail stop, and also do not yet adequately connect to the Tibby Cotter Bridge.</p> <p>The exclusion of off-site works from the SSD proposal may be due to a desire to not be seen 'taking over' control of land beyond the SFS site, or possibly aimed at managing the total project budget. But equally, the project can't be successfully developed without this connecting infrastructure being delivered concurrent with the SFS.</p> <p>The Trust restates its willingness to closely consult on this matter, and again extends its invitation for joint design workshops between Infrastructure NSW and CPMP to resolve the form and detail of these critical links. In this way the applicant isn't seen to be proposing works beyond the subject site, but can make a commitment to their design and implementation in conjunction with the renewal of the SFS.</p>	<p>The proposed development outlines a number of initiatives outside of the project site to be pursued by the SCSG Trust and Infrastructure NSW and others in consultation with key stakeholders. This includes a new 6m wide pathway to connect the new light rail stop adjacent to Moore Park to Driver Avenue being constructed as part of the CBD and South East Light Rail project. Whilst this link is to be delivered by TfNSW as part of the Light Rail project, Infrastructure NSW is committed to working with CPMP Trust to consider better pedestrian links between the Tibby Cotter Bridge and the stadium, around Kippax Lake. This link was envisaged in the adopted <i>Sydney Football Stadium Urban Design Guidelines</i> and will be detailed and delivered in consultation with the CPMP Trust, consistent with Infrastructure NSW's most recent discussions with the CPMP Trust CCC. At a recent CCC meeting, Infrastructure NSW was advised that the new link could take the form of intuitive design through planting or other mechanisms rather than being a typical hardstand path. The design of the pathway is, therefore, being worked through as part of a separate process. This commitment has been included in the updated Mitigation Measures to progress consultation with the CPMP Trust regarding this link, noting that it would not be within Infrastructure NSW and/or the SCSG Trust's jurisdiction to obtain the necessary development approvals.</p> <p>In addition, during the preparation of this Report, Infrastructure NSW met with TfNSW staff on 2 August 2019 at which signage and wayfinding was discussed. At this meeting it was agreed that further consideration of wayfinding and signage to support the development is required within the project site boundary of the SFS and more broadly within the Moore Park precinct and outside the project site boundary. This item will be considered in more detail (following consultation with key stakeholders) as part of the development of the Moore Park Traffic and Transport Management Plan being led by TfNSW (see Mitigation Measure D/O-TA4). At the meeting, TfNSW indicated that signage and wayfinding is not required to be fully resolved as part of the Response to Submissions phase of the project. The mitigation measures have been updated to reflect the commitment to work with TfNSW in the development of the Moore Park Traffic and Transport Management Plan. A</p>

No.	Extract	Response
	Importantly, the Trust's view is that the design and construction of this wayfinding and connecting pedestrian infrastructure, must be a pre-condition to development consent.	suitably worded condition of consent could further reinforce this commitment if considered appropriate.
	Architectural Design Statement and Landscape and Public Domain Statement	
CPMP3	<p>Driver Avenue</p> <p>The Trust, reasonably, expects the redevelopment of the SFS will contribute to the design and delivery of an integrated public realm within the immediate vicinity of Moore Park east.</p> <p>Moore Park 2040 calls for the management of Driver Avenue during event days as a safe pedestrian-friendly space - without necessitating its permanent closure to vehicles.</p> <p>Given related concerns regarding connecting pedestrian infrastructure, it further emphasises the need for the Trust and Infrastructure NSW to work cooperatively to resolve and design the public realm treatment for at least the northern portion of Driver Avenue as part of the SFS redevelopment works.</p> <p>This approach would at the same time offer an opportunity to resolve missing links in the pedestrian infrastructure (discussed earlier) and allow a range of precinct-wide issues to be resolved more strategically, minimising the risk of each venue in the vicinity duplicating facilities or operating in isolation.</p> <p>The Trust's view is that to ensure the proposed public realm design treatment for Driver Avenue is consistent for its full length, any design solution for the northern portion should be able to be implemented in the future along the remainder of Driver Avenue.</p>	<p>The proposed development supports the delivery of an integrated public realm within the immediate vicinity of the site. The interface between the site and the Driver Avenue kerb line outside of the stadium has been planned to provide for a consistent public domain. Whilst these minor interface works may occur outside of the site boundary, the Minister may impose a condition as follows:</p> <p><i>Prior to the final occupation of the site, the proponent is to upgrade the pavement of the footpath to Driver Avenue to the same standard as the new adjoining public domain within the site.</i></p> <p>It is emphasised that works occurring across the remainder of Driver Avenue unaffected by the proposed development are at the discretion of the CPMP Trust who care for, control and manage this land.</p>
CPMP4	<p>Cycle Facilities in Moore Park</p> <p>The Stage 2 proposal makes provision for the siting of bike racks around the SFS, including a number of locations along Moore Park Road, and also a bank of 30 bike spaces sited within CPMP land along Driver Avenue (page 66 of the Landscape and Public Domain Statement).</p> <p>The Trust believes a more strategic, precinct-wide, approach is required to ensure that unnecessary duplication of bicycle facilities is not promoted at each separate venue - the SCG, Hordern Pavilion, Entertainment Quarter and Royal Hall of Industries - along Driver Avenue, potentially contributing to unnecessary clutter in the public realm.</p> <p>A strategic approach would potentially allocate a smaller component of cycling facilities at each venue with the balance strategically located across Moore Park east to serve all venues in the vicinity. In line with its earlier comment, the Trust invites a joint design workshop forum to resolve the optimal solution for precinct-wide cycle facilities.</p>	<p>The proposed development is considered to support the commencement of the precinct-wide approach to bicycle parking suggested by the CPMP Trust, by providing dedicated parking at the stadium. The proposed development is entirely consistent with the Moore Park Master Plan 2040 which encourages increasing the number of bicycle parking spaces adjacent to sports stadia. Parking within the remainder of the precinct, and at key venues, is at the discretion of the CPMP Trust which has care, control, and management responsibilities over the broader precinct.</p> <p>The introduction of bicycle parking on Driver Avenue was intended to be the subject of future design and consultation with stakeholders, as outlined in the exhibited EIS. In response to the CPMP Trust's submission that it does not support this location, the SCGS Trust is committed to working with the CPMP Trust to determine a final location for the 60 bicycle parking spaces proposed post approval and in the context of all other initiatives external to the site that are required to be finalised (including wayfinding and the pedestrian link/connection around Kippax Lake). It may not be within Infrastructure NSW and/or the SCGS Trust's jurisdiction to obtain the necessary development approvals.</p>
CPMP5	<p>Future Links to Fox Studios and Entertainment Quarter</p> <p>The Architectural Design Statement makes mention (on page 36) that the redevelopment of the SFS will not preclude important future connections identified in Moore Park 2040. Similarly, the Landscape and Public Domain Statement (pages 49-51) reinforces this same point. This approach is strongly supported by the Trust.</p> <p>Moore Park 2040 raised the potential for a north-south link from Paddington Lane, alongside the SFS, through to connect with the public concourse of the SCG (when the Messenger Stand is</p>	<p>The proposed development, as far as is reasonable, provides for future connections to Fox Studios between SFS and the SCG, and from Moore Park Road to the SCG. The delivery of these links in their entirety cannot be completed at this time until further works occur at Fox Studios and the SCG. These connections are outside the scope of the SFS Redevelopment and the responsibility of other parties, and consequently will be subject to future coordination with the relevant stakeholders.</p>

No.	Extract	Response
	<p>redeveloped), to the Victor Trumper Stand public concourse, and then via a bridge across Fox Studios' access driveway into Entertainment Quarter.</p> <p>Moore Park 2040 also raises the opportunity for an east-west link, which would run between the SCG and SFS, and -at a suitable point in the future -connect directly into the heart of the Fox Studios precinct, on the alignment of Chips Rafferty Avenue.</p> <p>Close review of the Stage 2 documentation suggests the proposal is capable of supporting these potential future linkages. However, the Trust's view is that the proposal should elaborate on not only the proposed SFS levels, but the appropriate levels and tie-in points (referencing existing SCG public concourse levels, the Bradman Terrace level, Fox Professional Studio levels and so on) so the future detailed design can deliver a clear, legible and accessible network of linkages.</p>	<p>Further, the wording in the Master Plan 2040 enables these links to form part of a longer-term strategy for the area, acknowledging that further consultation and investigations would be required to develop through paths highlighting that Fox Studios prevents public access into its "walled" area.</p>
	Transport Assessment	
CPMP6	<p>Reduction of On-grade Car Parking at Moore Park East</p> <p>The Moore Park Master Plan 2040 identifies an important aim of reducing on-grade event day car parking on turf surfaces at Moore Park East (EP2 and EP3). The objective is to return these areas to high quality green open space not compromised by intermittent car parking. In particular, Moore Park 2040 identifies the creation of a 'village green' community space in the vicinity of Kippax Lake.</p> <p>Importantly, the plan demands an orderly and strategic approach to manage down the number of spaces provided for on-grade event day parking, and this must be considered holistically in the context of the major event parking demand created by the SFS.</p> <p>The Trust's view is that the SFS redevelopment must address and contribute to a reduction of event day parking on-grade within Moore Park east.</p> <p>However, the SSD Stage 2 documentation assumes an indefinite continuation of on-grade event day parking at Moore Park east, asserting that any future reduction in parking numbers will only occur 'over the medium and long term' (EIS section 6.3.1, page 153) and that 'there are no intentions (by the Centennial Park and Moore Park Trust) to modify event day parking arrangements'.</p> <p>These assumptions are incorrect and do not consider the opportunities currently being actively explored by the Trust to reduce on-grade parking at EP2 (Upper Kippax) as soon as possible.</p>	<p>The SCSG Trust does not control temporary event parking on Moore Park, which is managed by the CPMP Trust. It is emphasised that the proposed development remains consistent with the Master Plan 2040, which is predicated on no 'net loss of parking within the precinct'. It envisages the planned removal of parking on Moore Park in exchange for also exploring options for satellite parking. The proposed development does not prevent or otherwise impede this from occurring.</p> <p>It is noted that the assumptions regarding the timing for the removal of event day parking were correct at the time of writing and exhibiting the EIS. It was only identified in a subsequent CCC meeting on 19 July 2019 (as the exhibition period was nearing completion) that the CPMP Trust would commence phasing out parking from mid-2020.</p> <p>In the event that this parking is removed, the proposed development will remain consistent with the Master Plan 2040's commitment to investigate opportunities for remote Park and Ride for events, such as at Randwick Racecourse or at UNSW where events do not coincide with peak usage at these sites and where light rail usage can be maximised for access from the south.</p> <p>Section 6.6.2 of the Transport Assessment at Appendix H of the EIS and the updated Transport Assessment provided at Appendix J, considered a scenario where parking is removed from EP2 and EP3 and relocated to satellite park and ride areas. The analysis confirmed that there would be sufficient capacity in the transport network to accommodate the changed parking arrangements. Light rail and public transport will have additional capacity to transport people to the SFS to offset the loss of parking should EP2 and EP3 not be available.</p> <p>Furthermore, the Green Travel Plan being prepared for the project will identify a suite of initiatives and measures that patrons and event users can rely on to travel to/from the site. The range of measures / initiatives are wide-ranging and sufficiently flexible to adapt to a stepped change. This means that if and when parking scenarios do change, the Green Travel Plan initiatives can be commensurately ramped up.</p>
CPMP7	<p>Assessment of Existing Parking Numbers</p> <p>The Trust is concerned for a possible overstatement of existing parking numbers in the precinct to support the redeveloped stadium. Specifically, the existing parking numbers presented for Moore Park east (Transport Assessment, Appendix A 1.11, page 89) do not appear to be correct.</p>	<p>The existing parking numbers were taken based on counts undertaken by the SCG Trust for events at the SCG and SFS. It is acknowledged that parking capacity numbers vary from event to event based on ground conditions and how cars are arranged within the car parks, which may reduce the available capacity to 900 (EP2) and 1,050 (EP3). This does not however change the findings or recommendations of the transport assessment completed for the project.</p>

No.	Extract	Response
	The Trust understands there are approximately 900 (not 1,000) spaces at EP2 (Upper Kippax) and 1,050 (not 1,100) at EP3 (Showground Field), potentially a shortfall of 150 spaces, which further highlights the challenges of returning on-grade parking to useful green open space.	
CPMP8	<p>Green Travel Plan</p> <p>The proposed Green Travel Plan (EIS, Section 6.3.1, page 156) is, in the view of the Trust, modest in scope and detail, being particularly light on commitments to measures to further encourage a mode shift from private to public transport.</p> <p>Of particular concern is the omission of possible event day 'park & ride' opportunities working in concert with the new light rail service. A 'park and ride' arrangement might supplement event day car parking provision in the immediate SFS precinct, and in principle, might allow a SFS patron to park their vehicle at the University of New South Wales, Royal Randwick or ES Marks, and then transfer to light rail for the trip to the SFS.</p> <p>Such a strategy would reduce the concentration of vehicles accessing the immediate precinct and would potentially support the reduction of event day parking on-grade at EP2 or EP3.</p>	<p>The Transport Assessment at Appendix H of the EIS and updated Transport Assessment at Appendix J, has been prepared to align with the currently endorsed Moore Park Masterplan 2040. Section 6.6.2 of the Assessment discusses future opportunities to utilise satellite car parking areas located in close proximity to light rail stops for event 'park and ride' including UNSW and ES Marks Fields. This is not specifically addressed in the Green Travel Plan as it does not align with the objective of reducing private car use as a mode of travel to the venue.</p> <p>Notwithstanding this, Infrastructure NSW met with TfNSW staff on 2 August 2019 at which the Green Travel Plan prepared to support the project application was discussed. It was noted and acknowledged that a suite of measures to increase the mode share of public and active transport is already contained in the Green Travel Plan as submitted with the exhibited SSD DA package. The Green Travel Plan will be reviewed and updated periodically in line with the monitoring mechanisms outlined in the document and to reflect contemporary operating procedures. The mitigation measures have been updated to make this commitment clear, and a suitably worded condition of consent could be imposed to reinforce this arrangement.</p>
	Construction Management Plan	
CPMP9	<p>Construction Vehicle Management</p> <p>To maintain ongoing operational capacity in Moore Park, the Trust expects Driver Avenue will not be used for staging vehicles waiting to access the construction site. All construction vehicles should be accommodated within the construction works zone and not overflow into Driver Avenue or surrounding streets and roads.</p>	Trucks will not queue outside of the site on Driver Avenue. All construction works will occur within the site boundaries, noting no works zone is proposed at this time. These measures will be incorporated into the detailed Construction Pedestrian and Traffic Management Plan and associated Traffic Control Plan(s) to be developed with the Sydney Coordination Office, as per the commitment in Mitigation Measure CM-TA1.
CPMP10	<p>Dilapidation and Make Good</p> <p>The Trust confirms that Driver Avenue is under its care, control and management. Driver Avenue has been identified as providing access for construction.</p> <p>The Trust appreciates the commitment to prepare a photographic dilapidation report to document the existing condition of the surrounding road network.</p> <p>The Trust is of the view that any such dilapidation report should extend to other natural and built features of Moore Park east and Driver Avenue including trees, structures, Kippax Lake, bollards, footpaths, lighting and other existing services.</p> <p>Dilapidation reporting should also be required where any augmentation of in-ground services is necessary. And while a photographic record is essential, any dilapidation reports should include additional detail on make-good provisions in the event of damage due to construction activity and document the condition of any affected assets before and after construction works.</p> <p>Temporary reinstatement of any trenching works is not acceptable to the Trust, and it must be a condition of any approval to restore all built and natural assets along affected service routes to an approved standard that eliminates any risk to the public over the longer term.</p>	<p>Condition B3 of SSD 9249 applying to the demolition works may also be applied to the construction works. This requires that:</p> <p><i>Before the commencement of any works, the Applicant must:</i></p> <ul style="list-style-type: none"> a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and c) submit a copy of the dilapidation report to the Certifying Authority, Council and other relevant authority.

No.	Extract	Response
CPMP11	<p>Tree Protection</p> <p>Any future conditions of consent must deal comprehensively with tree protection. Notwithstanding the identified need for connecting pedestrian infrastructure to be designed and delivered with the SFS redevelopment, the Trust is very concerned for potential tree loss associated with the construction of new pathways, particularly around the Tibby Cotter bridge. In this vicinity there are a number of surviving Phoenix canariensis (Canary Island palms) planted in 1909 by Joseph Maiden, which are of considerable heritage significance.</p> <p>Accordingly, the Trust suggests the following draft condition of approval for consideration:</p> <p>'The tree collection in Moore Park is of outstanding heritage significance. These trees have national and local historical, aesthetic and social values. The Trust places the upmost priority on the protection of trees managed by Centennial Park/ands. Any works on Trust lands must be carried out with tree protection as a priority consideration. Aboricultural impact statements must be completed prior to any construction works including widening of paths, installation of lighting and other infrastructure within any tree protection zones. All works must be carried out in accordance with the Botanic Gardens and Centennial Park/ands Tree Protection Policy'.</p>	<p>The project does not include connecting pedestrian infrastructure, which will be subject to a separate approval process (as required), independent of the SFS project. As such, no trees are proposed for removal external to the site.</p> <p>All trees not identified for removal in the project documents will be retained and protected in accordance with the recommendations of the Arboricultural Report prepared by Tree IQ that accompanied the EIS at Appendix LL. If the Department is minded to impose a condition to this effect, the following is suggested:</p> <p><i>The trees to be retained shall be inspected, monitored and treated by a project arborist who must be a qualified (AQF) Level 5 arborist in accordance with AS4970-2009 Protection of trees on development sites. Only those trees indicated for removal on Plan LA-015 Rev E prepared by Aspect Studios and dated 08/08/19 may be removed.</i></p>
CPMP12	<p>Noise and Vibration Impacts</p> <p>Noise and vibration will be of concern to affected tenants of the Trust in the immediate vicinity - particularly at the Hordern Pavilion, Royal Hall of Industries, Entertainment Quarter and Fox Studios. Mitigation strategies to minimise the commercial impact and disruption to these tenants across the precinct need to be carefully assessed.</p>	<p>A Noise and Vibration Impact Assessment has been prepared by Arup and accompanied the EIS at Appendix X. The Assessment provided a detailed assessment of the level of impact on surrounding areas during the construction and operation of the proposed development. It confirms that all impacts are manageable. A supplementary assessment has been completed to confirm that neither noise nor vibration as a result of the proposed development will impact on the nearest tenant (Fox Studios).</p>
CPMP13	<p>Ongoing Events at Moore Park</p> <p>The Trust's firm view is there must be no impact on the operation of Mardi Gras, the Sydney Running Festival or any other public event in the area as a consequence of proposed construction.</p>	<p>Construction works will be subject to the standard construction hours in NSW under the EPA's <i>Interim Construction Noise Guideline</i>. Construction works on the site will be coordinated with event organisers where appropriate, to limit potential disruptions. It is also noted that neither Mardi Gras nor the Sydney Running Festival are reliant on access to the subject site, which has been traditionally fenced at the boundary.</p>
CPMP14	<p>Ground Water Impacts</p> <p>The Construction Management Plan identifies that Stage 2 works will involve excavation and piling, and the Trust is concerned for any potential impact to ground water given this ground water forms part of the urban catchment that sustains the Lachlan Swamps, important to the ecological health of nearby Centennial Park. Additionally, the Trust currently depends on ground water bores in Moore Park for irrigation.</p> <p>The Trust recognises that an appropriate ground water assessment has been prepared to determine water table levels and consider any potential impacts of construction. However, these appear not yet to be recognised in the Construction Management Plan.</p> <p>A further, significant, risk to groundwater includes potential contamination from the existing underground petroleum storage tank within the SFS site. The Trust seeks further assurances that measures to mitigate potential contamination of ground water are in place prior to commencement of construction.</p>	<p>The assessment completed by Douglas Partners confirms that the groundwater table will be at least 5m below the proposed field and the stadium at its shallowest point. Accordingly, it was confirmed that construction works would not penetrate the existing water table. In view of this, no mitigation measures are required or have been incorporated into the preliminary Construction Management Plan.</p> <p>The underground petroleum tanks will be managed in accordance with the <i>Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008</i>. This will be incorporated into the detailed Construction Environmental Management Plan to be prepared prior to commencing works on the site (see Mitigation Measure CM-4).</p>
CPMP15	<p>Erosion and Sediment Control</p>	<p>Erosion and sediment control measures are detailed in the Stormwater Management Plan prepared by Aurecon and accompanying the EIS at Appendix P. This Management Plan also assesses the</p>

No.	Extract	Response
	The Construction Management Plan appears to be generally silent on erosion and sediment control, despite the comprehensive nature of SEARs item 27. The Trust notes that based on the earlier stormwater report from Stage 1 SSD, it was proposed to connect the construction site to existing stormwater lines, some of which feed a number of the ponds at Centennial Park. Incoming water quality in Centennial Park is critical to the ecological health of the ponds, and further assessment of impacts and their mitigation is essential.	quality of water leaving the site and confirms that the introduction of stormwater quality improvement devices greatly increased the runoff water quality. MUSIC modelling confirms that the development will meet the post-development stormwater runoff quality targets.
	Security Statement	
CPMP16	The Trust acknowledges the NSW Police Force Terrorism Protections Unit has recommended to not publicly exhibit the full Security and Risk Assessment Strategy Report. In lieu of the opportunity to respond to this strategy, the Trust raises its more general concerns.	Noted, no further action required.
CPMP17	Hostile Vehicle Mitigation Measures to mitigate against hostile vehicle attack and the creation of stand-off distances to keep potential threats away from buildings and people is likely to be incorporated into the Stage 2 SSD proposal. The Trust is concerned that this must be a precinct-based strategy, incorporating all of Driver Avenue and not deal with the SFS as a single, isolated venue. Given Moore Park is a major event destination with a number of co-located venues, a precinct-based response will ensure similar issues currently faced at the Sydney Cricket Ground (SCG), Royal Hall of Industries (RHI) and the Hordern Pavilion (HP) are addressed at the same time to avoid potentially intrusive measures being replicated around each venue. The approach to entertainment venues typically adopts two lines of defence -an inner and outer cordon. In principle, the precinct should share an outer cordon, with the western side of Driver Avenue appearing to be a logical place for this to be located for event mode, thus protecting pedestrians using the road space. The key attributes of the Centennial Park and Moore Park Trust's 'hostile vehicle business case', previously submitted to NSW Cabinet, should be included within the project.	An HVM assessment for the site has been completed, which has informed the positioning, design and performance criteria of HVM elements in the proposed public domain design to deter and prevent ramming or intrusion by hostile vehicles. These elements may continue to be developed as proposal is translated into detailed construction drawings, however, the current design envisages all works to occur on the subject site. Works occurring outside of the site addressing other areas of Drive Avenue are at the discretion of the CPMP Trust who care for, control, and manage this land. Further, it is understood that the CPMP Trust's business case for HVM is cabinet in confidence and as such is not publicly available to Infrastructure NSW or appropriate to disclose.
	Operational Waste Management Plan	
CPMP18	Waste Management Waste management during event mode is a significant environmental issue for the Trust and the land it controls across the precinct, and is currently not well addressed in the Stage 2 SSD proposal. Although the operational waste management plan outlines a complete strategy for the venue itself, it makes no consideration of waste generation or collection across the wider precinct. The Trust notes there appear to be no waste collection facilities proposed within the public domain. Patrons exiting the stadium should pass well-designed, well-sited waste disposal facilities, which should also be coordinated on a precinct-wide basis. An ad-hoc overlay of temporary measures is not supported by the Trust, and the optimal solution can only emerge from a precinct-wide strategy being jointly prepared by the Trust and Infrastructure NSW.	As addressed, bins are to be provided within the stadium and public domain surrounding the stadium to appropriately manage the waste generated by the development. No bins are to be provided on neighbouring land, which is managed by the CPMP Trust and as such any bins provided on this land would be at the discretion and control of the CPMP Trust.

No.	Extract	Response
	Infrastructure Management Plan	
CPMP19	<p>Potable Water and Fire Services</p> <p>The Trust notes the identification of an existing 200mm water main along Drive Avenue. The Trust also anticipates this to be a Sydney Water asset and is unlikely to impact upon Moore Park. The detailed Stage 2 design indicates a potential for a second fire booster to be drawn off Driver Avenue, which may require trenching and associated works within the Trust's land. The Trust expects this issue will require clarification and approval.</p> <p>The final location of any secondary pumps and boosters must be identified in the detailed design of Stage 2 and require NSW Fire Brigade endorsement and approval.</p>	The preliminary plans for relocating, altering or augmenting infrastructure for the site will be subject to further discussions and relevant approval from the asset owners and authorities, including where relevant consulting with the Trust.
CPMP20	<p>Sewer</p> <p>The Stage 2 proposal identifies the main sewer line intended to serve the redevelopment of the SFS (and the SCG) runs along Driver Avenue and will require connection and potential augmentation - subject to a pending Sydney Water approval process. This may require works within Trust land and provision for make-good, including trenching and road closures are not yet described. This issue will require clarification and discussion with the Trust.</p>	
CPMP21	<p>Gas</p> <p>It appears the new SFS will seek to connect to gas mains along Moore Park Road. Final approvals for the Stage 2 proposal may require works in Driver Avenue. This issue will require clarification and consultation with the Trust.</p>	
CPMP22	<p>Telecommunications</p> <p>While no adverse impacts are anticipated, telecommunication services run along Driver Avenue and there may be a need to undertake trenching work with the roll-out of the NBN. Consequently, an application may need to be made to the NBN for site connectivity. This issue will require clarification and consultation with the Trust at the appropriate time.</p>	
CPMP23	<p>Conclusion</p> <p>The Stage 2 SSD application highlights the degree of alignment between the proposal and the Moore Park Master Plan 2040. It further refines the scope of the earlier Stage 1 SSD application prepared for the SFS. It is clear the authors have interrogated, understood and generally safeguarded the ideas and strategies documented in the Moore Park 2040 Master Plan.</p> <p>The Trust appreciates ongoing consultation with Infrastructure NSW and has had the opportunity to relay a number of the concerns and recommendations outlined in this submission directly to Infrastructure NSW.</p> <p>However, the Trust anticipates that pressure to define and limit the project to its subject site, and consequently, the exclusion of off-site works, risks delivery of a project that is disconnected from its urban and parkland setting.</p> <p>It is of critical importance that connecting pedestrian infrastructure and precinct-wide strategies to ensure safe public access and a high-quality visitor experience are conceived, designed and delivered concurrently with the proposed SFS redevelopment. This is currently not evident in the application.</p>	Noted, no further action required.

1.9 NSW Environment Protection Authority

No.	Extract	Response
EPA1	<p>The EPA requests that this submission be read in conjunction with its letter dated 1 February 2019 in respect of the draft SEARs for the project.</p> <p>The EPA notes that the overall project comprises: Stage 1 demolition of the existing stadium and ancillary buildings; and Stage 2 design, construction and operation of the new stadium, and that Stage 1 was the subject of a separate assessment.</p> <p>The EPA understands that, although the development site is located within Sydney Cricket and Sports Ground Trust lands, the Trust is not the proponent. The EPA anticipates that on completion of the redeveloped football stadium precinct, control and management of those facilities would revert to the Sydney Cricket and Sports Ground Trust.</p> <p>Attached are the EPA's detailed comments in relation to noise impacts during both operation and construction (Attachment A), and land contamination (Attachment B).</p>	Noted, no further response required.
	Noise	
EPA2	<p>General</p> <p>The key issue is the management of Event noise. Noise impacts from the new stadium are not expected to change significantly, the review identified a number of areas where the proponent must provide clarification.</p> <p>The EPA will need to further consider items that may affect the regulation of the premises, particularly with regards to defining the mechanisms for determining compliance with the (proposed) revised noise limits. Comments are focussed on the DNMP as the primary tool for managing noise.</p> <p>Technical issues have been identified within the Operational (Non-Event) and Construction noise assessments. Although further information and clarification is required, it is not anticipated that this will materially alter the outcomes reported in these assessments. Operational noise (Non-Events) is not expected to present a significant risk and can be managed with good practice. Construction noise can be adequately managed with established procedures.</p>	Noted, no comment required.
EPA3	<p>Events Noise</p> <p>The Noise report has predicted noise from concert events based on three different sound system configurations and noise from sporting events. The application proposes amending noise limits to a Leq,5min A-weighted level and a 63Hz unweighted octave band level, developed in consultation with EPA and DPIE. The predictions indicate that event noise will comply with these proposed noise limits.</p> <p>The primary mechanism for managing noise impacts is presented in the DNMP. This is critical to ensure the premises can effectively manage noise impacts. Therefore, it is important that at this stage, the proponent outlines the principles and methods they intend to use when the stadium is operational. There are a number of issues in the DNMP and Noise report that require further clarification. These matters are necessary for the EPA to develop an updated Prevention Notice and/or EPL to regulate event noise.</p>	Noted, no comment required.

No.	Extract	Response
EPA4	1) The noise report has not provided an assessment of how the proposed stadium will perform against the noise requirements in the current Prevention Notice (1003904) as required by Condition C17 of the SSD 9249 Development Consent. Whilst the noise report claims that the proposed stadium design will reduce noise levels from sporting, non-sporting and concerts events, and states that it can achieve the revised Leq,5min noise limits, it has not demonstrated that the existing Prevention Notice limits can be met. Because, the Leq,5min limits were derived from a comparison of Lmax and their equivalent Leq5mins from previous events, impacts are not expected to differ significantly. However, this requirement is set out in the SEARs and also is important to demonstrate and support the proposed change to noise limits and noise indicators.	Infrastructure NSW consulted with the Department during the preparation of the Noise and Vibration Impact Assessment at Appendix X of the EIS to determine how best to address the SEARs (noting that the details of these meetings can be found on the Consultation Outcomes Report at Appendix HH of the EIS). During these discussions, the parties agreed that the proposed limits as detailed in the Impact Assessment would be the equivalent of the existing limits, and that the Impact Assessment would demonstrate that event noise complies with the proposed limits, thereby resulting in compliance with existing limits.
EPA5	2) SEARs Key Issue 20, bullet point 3 requested noise from events / activities outside of the stadium structure to be addressed. The Noise report does not address these activities such as amplified music outside of the stadium for fan engagement activities or public address systems in Fig Tree Place or Busbys Corner. There is a risk that portable sound systems may be placed in these areas for events as they are currently at the SCG for sporting events. The proponent should assess these events / activities and provide details on how they will be managed.	The updated Noise and Vibration Impact Assessment at Appendix F addresses the impacts from these additional noise sources. Specifically, Section 5.4.1 of the Impact Assessment assesses these potential noise sources and Mitigation Measures 16 of the Assessment recommends the use of quiet sound systems and the direction of speakers in Fig Tree Place and Busby's Corner to the south away from residences on Moore Park Road.
EPA6	3) A definition of a non-compliance is proposed in Chapter 3.4 the DNMP, as requested by SSD 9429 Development Consent Condition C20c). However, the proposed non-compliance scheme does not have any basis, is ambiguous, and lacks definitions regarding the cumulative effect of exceeding periods. The EPA also considers that will likely permit many excursions over the noise limit, for example allowing 4 occasions to exceed the limit by more than 5 dB. This means for 4 non-consecutive 5 minutes blocks, noise levels could be more than 5 dB above the criteria. The EPA will need to consider how it will define a non-compliance and regulatory action triggers.	The definition of a non-compliance provided in Section 3.4 of the Draft Noise Management Plan represents a methodology that is consistent with assessing sustained exceedances, and has been discussed and agreed in principle with the Department.
EPA7	4) The Noise report does not provide a clear description of all measures to minimise potential noise impacts that will be considered as part of the design. Whilst the report does provide an analysis for the use of an acoustically opaque roof, it also states that there will be a 5 metre gap under the roof, but does not justify why exploring further enclosure of the stadium envelope has not been investigated. The proponent should set out the design measures considered to manage noise emissions from all noise generating items and activities as required by Key Issue 20 of the SEARs.	Design considerations which have been investigated throughout the assessment process include: <ul style="list-style-type: none"> • Solid roof • Maximising façade heights • Minimise penetrations in façade • PA system design The discussion at Section 5.9.1 of the Impact Assessment at Appendix F addresses the design considerations.
EPA8	5) The Noise report has not nominated noise limits for intermediate compliance points as required by Condition C19 of SSD 9249 Development Consent. Although the design is not sufficiently advanced to permit a detailed calculation, the determination of accurate intermediate compliance limits will need to be progressively developed. It is recommended that a trial period, to validate and refine the limits, is implemented. This should include a sufficient number of events, configurations, and meteorological conditions to obtain a representative data.	A trial period is prescribed in Section 3.6.3 of the Draft Noise Management Plan to this effect.
EPA9	6) The alternative compliance methodology proposes to use continuous noise monitoring points in the stadium roof. The proponent should continue to review the location of monitoring points as the design is developed to ensure that the locations are suitable and able to provide a reliable intermediate point to represent noise emissions from amplified sound sources at sensitive receivers.	A review of monitoring locations is prescribed in Section 3.6.3 of the Draft Noise Management Plan to this effect.

No.	Extract	Response
EPA10	7) The Noise report and DNMP should maintain a consistent definition of sensitive receiver for event noise. The current Prevention Notice (1003904) classifies them as “places such as nursing homes, hospitals, schools and residences”. In Chapter 2 of the Noise report, a sensitive receiver is defined as residential, educational, child care etc. However, the DNMP only applies noise limits at residential receivers. This could have implications for the educational UTS building adjacent to the SFS which is considered a sensitive receiver when in use. The proponent should clarify the receiver types where noise limits apply and which locations will be used for compliance purposes.	The current prevention notice does not apply any noise limit to event noise at non-residential receivers. This is in line with the existing Noise Management Plan, Section 3.1.2 of the current Noise Management Plan provides reasoning why these receptors are “less prone to impact”, including the general transient nature of their occupants, internal use and times of use. Further clarity around the definition of “sensitive receivers” has been included in Section 2.1 of the Noise Management Plan, including mapping of these nominated receivers.
EPA11	8) The DNMP has not provided an analysis of events which are deemed to comply and those which will require specific Event Acoustic Assessments which was required by Condition C20b) of the SSD 9249 Development Consent. The proponent should provide this analysis.	A deemed to comply condition, in line with events to which the existing Noise Management Plan, applies to events “involving 200 or more people where sound amplification equipment is used” has been included in the Noise Management Plan and the Noise and Vibration Impact Assessment at Appendix F .
EPA12	9) The DNMP has defined an event representative’s responsibilities, and that the Trust has ultimate responsibility, but has not clarified the chain of responsibility regarding noise management. This information was required by Condition C20d) of the SSD 9249 Development Consent and should be provided.	As outlined in Section 3.7 of the Noise Management Plan, a more detailed chain of responsibility shall be developed in consultation with the SCSG Trust, and implemented in the final Management Plan.
EPA13	10) The DNMP should clarify the management strategies to minimise impacts of sound checks, rehearsals, bump in and bump out, post event clean-up activities and maintenance as required by Condition C20e) of the SSD 9249 Project Approval. The DNMP does not currently provide clear management strategies for these items.	The Noise Management Plan confirms that the monitoring system will include sound checks and rehearsals, and includes measures for bump-in and bump-out activities in Section 3.9.
EPA14	11) The DNMP currently states that noise limits will not apply at wind speeds greater than 5 m/s following Table 5. The proponent should provide more information on this item as follows: a. The location where the wind speed is measured should be defined. b. The intermediate compliance points are proposed to be in and around the stadium roof where wind speeds would be expected to be elevated. The proponent should describe how the monitoring system will consider elevated wind speeds and the ability to measure event noise effectively. c. The proponent should clarify the meaning of the statement “wind generated noise is considered to be a significant contributor to event noise” following Table 5 of the DNMP. Noise limits apply only to the amplified sound system and not to the total ambient noise, so it is not clear how wind generated noise contributes to event noise. d. The EPA should also consider whether to apply additional noise limits for wind speeds greater than 5 m/s so that the premises has noise limits under all meteorological conditions.	a & b) The limitation of wind speed will apply when attended measurements are made at receiver locations and not for the permanent monitoring system. The proposed monitor locations are below the roof, described in Section 3.6.1 of the Noise and Vibration Impact Assessment (Appendix F). Based upon current design and consultation with the design team, high wind speeds are not anticipated underneath the roof, however the influence of wind on measurements shall be considered throughout the design and specification of the system. c) This has been clarified in Section 3.3 of the updated Noise Management Plan. d) Following from above, additional noise limits for conditions where wind speeds are greater than 5m/s are not required.
EPA15	12) The DNMP will need to be updated progressively as the design advances and the regulatory framework is developed.	This recommendation is mirrored in the recommendations in the Noise and Vibration Impact Assessment and the Draft Noise Management Plan.
EPA16	Operational noise (non-event) The Noise report has provided an assessment of operational noise unrelated to events. The impact of these operational noise sources has only been indicatively assessed as the design is not at a stage which allows for a detailed assessment. Whilst operational noise (non-event) is unlikely to cause significant impacts, there were a number of issues with the assessment as follows:	a) No revision to the project trigger levels has been made as adjusting the project amenity level by -5dB cannot be achieved due to high traffic noise levels at receivers, as noted in Table 52 of the exhibited Noise and Vibration Impact Assessment at Appendix X of the EIS. The Impact Assessment shows compliance with more stringent criteria, and as such also demonstrates compliance with the PNTLs.

No.	Extract	Response
	<p>1. The indicative assessments in the Noise report have not been undertaken in accordance with the NSW Noise Policy for Industry (NPfI) (EPA, 2017)</p> <ol style="list-style-type: none"> The Noise report has not derived Project Noise Trigger Levels (PNTL) in accordance with the NPfI. The report should be revised and use the process in Section 2.1 and Figure 1 of the NPfI to determine PNTLs for operational noise sources. Chapter 4.3 has used either an amenity level or intrusive level as criteria for the assessment, which is not consistent with the NPfI. The noise report should be revised to assess operational noise according to NPfI Section 3. Table 27 of the Noise report has not derived the maximum noise level event trigger levels in accordance with NPfI Section 2.5. The Noise report should be updated to include correct triggers levels. <p>2. The night criteria in Table 34 and Table 37 of the Noise report are not consistent with the criteria listed in Table 27 of the report. Furthermore, only the intrusive criteria has been considered instead of the PNTL. The Noise report should be updated to include an assessment using the correct PNTLs.</p> <p>3. During subsequent stages of the design, the operational noise levels should continue to be assessed and mitigated where required to meet the requirements of the NPfI.</p>	<p>b) The NPfI has simplified the assessment of the intrusiveness and amenity criteria by making an assumption as to the relationship between the LAeq15minute and LAeqperiod. However, for the SFS operations, this assumption is not considered appropriate given the operating times of various activities. In accordance with Section 2.2 of the NPfI, alternative approaches can be presented. The assessment presented is consistent with the more detailed approach of the previous INP. Further explanation will be provided in the Noise and Vibration Impact Assessment.</p> <p>c) The revised Noise and Vibration Impact Assessment at Appendix F includes updated levels.</p> <p>2. Similarly to above, revised Noise and Vibration Impact Assessment at Appendix F includes updated levels</p> <p>3. No response required.</p>
EPA17	<p>Construction noise and vibration</p> <ol style="list-style-type: none"> The Noise report has applied a noise management level of 70 dBA for child care centres. However Interim Construction Noise Guideline (DECC, 2009) (ICNG) Section 4.1.3 states that alternative management levels may apply to noise sensitive business such as child care centres. The EPA considers that use of the upper internal noise levels in AS 2107 for an equivalent occupancy type may be more appropriate to set management levels for child care centres, unless the proponent can provide a justification for the currently proposed management levels. Predicted construction noise levels are above the highly noise affected level at one representative receiver (R6) for the majority of the construction activities. However, the scale of the maps in Appendix D make it difficult to see the extent and number of receivers impacted over the highly noise affected level. The noise report should detail the number of receivers and the duration of the activities which are predicted to be above the highly noise affected level. As the highly noise affected level is predicted to be exceeded, the proponent should nominate additional feasible and reasonable mitigation, including consideration of community engagement and respite periods. The management of construction vibration should consider any sensitive medical imaging equipment or human comfort in the educational UTS building. Road noise impacts from construction activities was assessed and did not predict significant increases in road noise levels from heavy vehicle movements. However, there are expected to be up to 600 workers on site. Whilst the construction traffic impacts are unlikely to exceed the Road Noise Policy (DECCW, 2011) (RNP) criteria, light vehicle traffic generated by construction should be considered in the assessment. Figure 6 of the Noise report shows the assessed construction traffic routes. However, these routes are not consistent with the routes in Figure 60 and 61 of the EIS report. The proponent should 	<ol style="list-style-type: none"> The assessment of the childcare centre as a commercial receiver is consistent with the conditions of SSD 9249 and the Stage 1 Mitigation Measure CP-NV1, which require that the subsequent Stage 2 assessment be conducted with regard to the criteria outlined in the Stage 1 Noise and Vibration Impact Assessment. Noise levels at each individual receiver have not been predicted. Rather selected representative locations were selected to represent noise levels of receivers in the near vicinity, which is the accepted assessment methodology. The noise level at R6 indicates some receivers along Moore Park Road may also experience 'highly affected' noise levels, as discussed in Section 3.4.4 of the Impact Assessment. All feasible and reasonable mitigation measures have been recommended for implementation during the construction works, including consideration of community engagement and respite periods. The appointed contractor will be made aware of the recommendations in the exhibited and amended subplan and will be required to commercially deliver or exceed these initiatives. Through the design development phase, these initiatives can continue to be evaluated and reported to the Department, if considered appropriate. The Mitigation Measures CM-NV1 to CM-NV6 will appropriately engage these initiatives. Arup confirm that UTS was consulted during the preparation of the Noise and Vibration Impact Assessment. UTS confirmed that there is no vibration sensitive equipment (such as sensitive medical imaging) located on site, and as such safe working distances for vibration intensive equipment have been recommended in the Impact Assessment to maintain vibration levels which comply with human comfort criteria. Light vehicles have been included in the updated assessment of construction traffic. Section 3.5 and the construction traffic routes have been updated in the revised Impact Assessment.

No.	Extract	Response
	<p>provide an assessment of potential impacts for all significant construction traffic routes for light and heavy vehicles.</p> <p>7. The Noise report does not provide a draft Construction Noise and Vibration Management Plan (CNVMP) as requested by the SEARs. The Noise report states that the CNVMP will need to be prepared by the contractor prior to construction commencing. It is unlikely that the proponent has sufficient detail to enable a CNVMP to be developed at this stage. However, the principles and methodology for the draft CNVMP should still be included.</p> <p>8. Consistent with the Noise report's proposal, construction working times to be limited to:</p> <ul style="list-style-type: none"> – 7am and 6pm Monday to Friday – 8am to 1pm Saturdays – No work on Sundays or Public Holidays 	<p>7. Arup has prepared a Draft Construction Noise and Vibration Management Plan, which will be updated and finalised with the appointed contractor prior to the issue of the relevant construction certificate. This is reflected in Mitigation Measure CM-NV1, and an appropriately worded condition could further reinforce this obligation.</p> <p>8. It is recommended that Condition C5 to C8 of SSD 9249 be imposed on this subsequent Stage 2 DA.</p>
General comments on reports		
EPA18	<p>Detailed Site Investigation (Appendix J1 of the EIS report)</p> <p>This report has been reviewed by the Site Auditor.</p>	Noted, no further action required.
EPA19	<p>Groundwater Assessment (Appendix GG of the EIS report)</p> <p>This consists of response to Water and Natural Resources SEARs1. This report does not have much relevance information regarding groundwater contamination and is not relevant to contamination comments for the EPA.</p>	Noted, no further action required.
EPA20	<p>Interim Audit Advice (Appendix J2 of the EIS report)</p> <p>This letter is an interim audit advice and not a site audit statement. Despite being an interim advice, the letter is useful in providing the Auditor's opinion following review of the site investigations prepared by the consultant. DPIE should continue to require use of site auditor as part of consent conditions for the site.</p> <p>The EPA agrees with the recommendations listed in the interim audit advice so that:</p> <ul style="list-style-type: none"> • Imported topsoil meets the Recreational / Recreational Open Space criteria defined in Schedule B1 of the National Environment Protection Measure, As Amended (NEPC, 2013). • Any VENM classification should take into account historic and any additional results. • A CEMP is developed for the construction phase of the development and must set out clear protocols for unexpected finds encountered. • The preliminary waste classifications outlined in Section 2 above are amended based on any 'unexpected finds', where appropriate. • Any waste transported off-site is waste classified in line with the EPA guidelines and taken to a facility that can lawfully receive the waste. 	Noted, no further action required.
Adequacy of any mitigation measures proposed		
EPA21	<p>One sample on-site was reported to contain bonded fibre cement. This suggests that asbestos containing materials may be encountered on the site and should be dealt with via an Unexpected Finds Protocol. The Unexpected Finds Protocol in Section 1.2.1 of the construction management plan does</p>	<p>An Unexpected Contamination Finds Protocol has been prepared and separately reviewed and endorsed by the Site Auditor (see Appendix E). This will be incorporated into the detailed Construction Environmental Management Plan in accordance with Mitigation Measure CM-CON3.</p>

No.	Extract	Response
	not include protocol for unexpected contamination at the site. Hence the EPA recommends that the proponent develop unexpected finds protocol to deal with unexpected contamination at the site.	
	Compliance with SEARS	
EPA22	<p>The proponent complied with majority of the requirements specified in Section 21 of the SEARs. However, more details are required to address the following requirements:</p> <ul style="list-style-type: none"> Provide details of the methods of identification, handling, transport and disposal of any asbestos containing and other hazardous materials that may be encountered during this development. Submit Spoil and Demolition Waste Strategy or Protocol, in case of a Remediation Action Plan (RAP) being submitted. The Spoil and Demolition Waste Strategy / Protocol should identify how contaminated material and soil will be managed during the demolition stage both on-site and off-site demonstrating that suitable processes would be in place to ensure no cross contamination or unauthorised disposal of contaminated material occurs. Instead of a site audit statement, an interim audit advice was submitted as Appendix J of the EIS requirements. The EPA notes that interim audit advice is different from a site audit statement, and that prior to site use, the proponent will need to submit a site audit statement regarding the suitability of this land for its proposed use. 	<ul style="list-style-type: none"> In the event that asbestos is uncovered on the site, appropriate protocols are detailed in the Unexpected Contamination Finds Protocol that has been separately reviewed and endorsed by the Site Auditor (see Appendix E). Whilst it is emphasised that the proposed development will not alter the existing and approved use of the site, the updated letter by Senerva at Appendix D confirms that an Interim Audit Advice or further statement will be provided at the appropriate stage, noting that it would not be possible to produce a Section A Site Audit Statement until all earthworks are completed and there are no further opportunities for unexpected finds. This will be carried out in accordance with Condition C26 of SSD 9249.
	Recommendations relating to contaminated land matters	
EPA23	<p>The EPA recommends the following:</p> <ol style="list-style-type: none"> DPIE to include a development consent condition requiring the proponent to continue use of the site auditor. The site auditor should be engaged by the proponent to issue a Section A site audit statement on the suitability of the land for the proposed use. The proponent to adhere to Section 7.7 of the Construction Management Plan (Appendix AA of the EIS) and to manage the existing underground petroleum storage system at the site as per the <i>Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2014</i>. The Proponent prepare a detailed procedure for identifying and dealing with unexpected finds (which potentially could include asbestos containing materials), prior to commencing any work on the development site. The proponent should ensure that the procedure includes details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved. The Proponent ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination [note that this would render the proponent the 'person responsible' for the contamination under section 6(2) of CLM Act]. All reports submitted in relation to contaminated land management are prepared, or reviewed and approved, by a 'certified consultant'. <ul style="list-style-type: none"> Note: A 'certified consultant' is a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The quality information section of a 	<ol style="list-style-type: none"> Whilst it is emphasised that the proposed development will not alter the existing and approved use of the site, the updated letter by Senerva at Appendix D confirms that an Interim Audit Advice or further statement will be provided at the appropriate stage, noting that it would not be possible to produce a Section A Site Audit Statement until all earthworks are completed and there are no further opportunities for unexpected finds. This will be carried out in accordance with Condition C26 of SSD 9249. The final Mitigation Measures include a requirement for the detailed Construction Environmental Management Plan to include provisions for adhering to the <i>Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2014</i>, as relevant. Refer to Mitigation Measure CM-4. An Unexpected Contamination Finds Protocol has been prepared and separately reviewed and endorsed by the Site Auditor (see Appendix E), and is included in Mitigation Measure CM-CON3. The Detailed Site Investigation at Appendix J of the EIS assessed the conditions of the site and confirmed there was a low risk of off-site migration. The Site Auditor confirmed the findings of this assessment. <p>5-8. Noted, no further action required.</p>

No.	Extract	Response
	<p>report submitted, is to include the details of the consultant's certification, which should include a personalised electronic seal for either the CEnvP(SC) scheme or CPSS CSAM scheme.</p> <ul style="list-style-type: none"> Please note that the EPA's Contaminated Land Consultant Certification Policy supports the development and implementation of nationally consistent certification schemes in Australia, and encourages the use of certified consultants by the community and industry. Note that the EPA requires all reports submitted to the EPA to comply with the requirements of the Contaminated Land Management Act 1997 (CLM Act) to be prepared, or reviewed and approved, by a certified consultant. <p>6. The following guidance, as relevant, should be considered, when assessing contamination at the site:</p> <ul style="list-style-type: none"> NSW EPA Sampling Design Guidelines www.epa.nsw.gov.au/resources/clm/95059sampgdline.pdf Guidelines for the NSW Site Auditor Scheme (3rd edition) 2019 https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-for-the-nsw-site-auditor-scheme-third-edition Guidelines for Consultants Reporting on Contaminated www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf The National Environment Protection (assessment of contamination) Measures 2013 as amended. <p>7. The Proponent must ensure that any contamination identified as meeting the trigger in the EPA 'Guidelines for the Duty to Report Contamination' is notified (or re-notified) in accordance with requirements of section 60 of the Contaminated Land Management Act; and</p> <p>8. The processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55) be followed, to assess the suitability of the land and any remediation required in relation to the proposed use.</p>	

1.10 Sydney Water

No.	Extract	Response
SW1	<p>Water</p> <p>The developer will need to amplify and extend the existing water system to service the development.</p>	<p>The proposed alterations to the existing potable water network was assessed in the Infrastructure Management Plan that accompanied the EIS at Appendix U. This includes a new connection from the main on Moore Park Road. The acceptance of this solution will be subject to a Section 73 Certificate, which will be obtained prior to the commencement of the relevant works on the site.</p>
SW2	<p>Wastewater</p> <p>The existing wastewater system does not have capacity to support the expected wastewater flows from the development. The developer will need to either amplify the existing system or provide appropriate onsite storage and pump to the Sydney Water system.</p>	<p>The proposed alterations to the existing stormwater system was assessed in the Stormwater Management Plan that accompanied the EIS at Appendix P. This includes the provision of enlarged and new on-site detention tanks and augmenting the existing stormwater connections. The acceptance of this solution will be subject to a Section 73 Certificate, which will be obtained prior to the commencement of the relevant works on the site.</p>
SW3	<p>Stormwater</p>	<p>Noted, no further action required.</p>

No.	Extract	Response
	<p>The proposed development requires deviation to a major stormwater infrastructure owned by Sydney Water as identified under SSD 9249-Mod 2 (see attached letter from Sydney Water). Sydney Water does not object with the proposed diversion of its stormwater assets. The developer has submitted an application directly to Sydney Water for the proposed deviation works. Sydney Water is currently working with the developer during the development of the design for the deviation to ensure the works meet Sydney Water's requirements.</p> <p>General requirements for Sydney Water servicing and work on our stormwater systems are included in the attachments.</p>	
SW4	<p>Heritage</p> <p>Sydney Water has a State Heritage Listed item, Busby's Bore, in very close proximity of the proposed development. Any impact on Busby's Bore as part of the redevelopment of the Sydney Football Stadium must be referred to Sydney Water for advice about its future management. The applicant is required to consult with the Heritage Council about any work in the vicinity of or about any impacts to Busby's Bore.</p> <p>This advice is not a formal approval of our servicing requirements. Detailed requirements will be provided when the proponent applied for a Section 73 Certificate prior to commencement of development. Further advice and requirements for this proposal are in the attachments.</p>	<p>A Section 73 Certificate will be acquired prior to the commencement of relevant works on the site. The Department's standard conditions of consent are expected to be imposed, and would address this matter.</p>

1.11 Civil Aviation Safety Authority

No.	Extract	Response
CASA1	<p>Lighting/Glare</p> <p>The approach to lighting design as described in EIS is satisfactory and there will be an acceptable Level of Safety. No mitigations would be required. In any case, the site is outside the '6000m zone' for Sydney Airport.</p>	Noted, no further action required.
CASA2	<p>Height</p> <p>As described in the EIS, at a maximum height of RL 85m there is no infringement of the OLS for Sydney Airport and there will be an Acceptable Level of Safety. No mitigations would be required.</p>	Noted, no further action required.

1.12 Sydney Airport Corporation Limited

No.	Extract	Response
SA1	<p>The application sought approval for the PROPERTY DEVELOPMENT to a height of 85.0 metres Australian Height Datum (AHD).</p> <p>In my capacity as Airfield Design Manager and an authorised person of the Civil Aviation Safety Authority (CASA) under Instrument Number: CASA 229/11, in this instance, I have no objection to the erection of this development to a maximum height of 85.0 metres AHD.</p> <p>The approved height is inclusive of all lift over-runs, vents, chimneys, aerials, TV antennae, construction cranes etc.</p>	Noted, no further action required.

No.	Extract	Response
	Should you wish to exceed this height a new application must be submitted.	
SA2	<p>Construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations.</p> <p>Sydney Airport advises that approval to operate construction equipment (ie cranes) should be obtained prior to any commitment to construct. Information required by Sydney Airport prior to any approval is set out in Attachment A.</p> <p>"Prescribed airspace" includes "the airspace above any part of either an Obstacle Limitation Surface (OLS) or Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) surface for the airport (Regulation 6(1)).</p> <p>The height of the prescribed airspace at this location is 156 metres above AHD.</p>	A separate application for the temporary operation of cranes on the site during construction will be completed as part of the detailed construction planning phase, as required.

1.13 Transgrid

No.	Extract	Response
TG1	We have reviewed the subject areas and can advise this proposal will not affect TransGrid's Infrastructure and/or Easements. However, we can advise after further investigation it does appear that Ausgrid may operate within this area.	Noted, no further action required.

1.14 Ausgrid

No.	Extract	Response
AUG1	Ausgrid has reviewed the EIS and has no further submission.	Noted, no further action required.
AUG2	We note that the EIS does not address the existing assets on site and the requirements to safely decommission and retire those assets.	Existing utilises and services on the site have been summarised in the Infrastructure Management Plan that accompanied the EIS at Appendix U. Appropriate approvals will be obtained from utility providers prior to decommissioning, augmenting or installing new utilities or connections.
AUG3	There are also 132kV cables in Driver Ave. Ausgrid must be notified of any construction activity within 2m of these cables.	The detailed Construction Environmental Management Plan, committed to at Mitigation Measure CM-1, will include standard measures for carrying out work on or adjacent to services including notifying the relevant agencies.

1.15 Department of Defence (Commonwealth)

No.	Extract	Response
DD1	<p>The subject site is approximately 300 metres from the main entrance to Victoria Barracks Sydney (VBS) on Moore Park Road.</p> <p>Defence understands that the proposal is seeking to replace an existing stadium of similar capacity. Base personnel from VBS have received ongoing briefings from the NSW Government project team regard the redevelopment and the potential impact on Defence activities at VBS from demolition noise and traffic movements along Moore Park Road. The project team has committed to provide the Base with monthly updates and to inform them of any upcoming events that may affect access to VBS.</p> <p>Defence has no significant concerns regarding the proposal and requests that the ongoing engagement between the NSW Government project team and base personnel from VBS continue.</p>	Noted, no further action required.

1.16 NSW Police Force

No.	Extract	Response
NSWP1	<p>Police expectations during construction the same as the demolition phase:</p> <ul style="list-style-type: none"> • Notification of any road closures during demolition and construction work. • Adequate lighting of the work site at night. • The work site to secured at night or during periods of inactivity. • Security patrols of the work site by contracted licensed security guards. • All engineers, workers, visitors, security guards, etc be vetted and to follow instructions and warnings as stipulated in a formal induction process. • Police be offered a familiarisation tour of the work site. • Notification of any suspicious activity or objects in or around the work site during demolition and construction work. • A list of key contacts on the work site. 	The requirements nominated by NSW Police will form part of the final detailed Construction Environmental Management Plan which is to be developed for the site prior to commencing construction works. This is reflected in the final mitigation measures, specifically Mitigation Measure CM-3.

1.17 Fire and Rescue NSW

No.	Extract	Response
FR1	<p>FRNSW provides the following comments in relation to the specified documentation submitted in support of the development application:</p> <p>1. Transport Assessment – Appendix H</p> <p>FRNSW notes that it is proposed to utilise the Paddington Lane as an entry to the construction site. FRNSW also notes that the Fire Booster Connections for the Fire Hydrant and Sprinkler Systems serving the Sydney Cricket Ground (SCG) are provided at the Paddington Lane entry from Moore Park Road.</p> <p>FRNSW does not object to access being provided to the construction site via this access way, provided the Fire Booster Connections serving the SCG are not impeded in any way, at any time.</p>	Noted, the proposed conditions are acceptable.

No.	Extract	Response
	<p>Additionally, access is also to be maintained along Paddington Lane so that access is provided to the SCG, for fire-fighters in the instance of a fire or other emergency at the SCG. Should access to the SCG for fire-fighters, via Paddington Lane be restricted or blocked for any period of time, during the construction of the SFS, it requested that FRNSW be advised in writing two (2) days prior to the access being restricted or blocked, so that operational plans can be put in place whilst the access is restricted.</p> <p>Recommended conditions of consent provided below.</p> <p>A. <i>The Fire Booster Connections for the Fire Hydrant and Sprinkler Systems, serving the Sydney Cricket Ground, located on Paddington Lane, are not to be obstructed at any time and shall be accessible to Fire and Rescue NSW personnel and pumping appliances at all times.</i></p> <p>B. <i>Where access along Paddington Lane to the Sydney Cricket Ground, from Moore Park Road, is proposed to be restricted at any time, Fire and Rescue NSW is to be advised in writing two (2) days prior to access being restricted. The written advice is to be forwarded to the following email addresses of Fire and Rescue NSW:</i></p> <ul style="list-style-type: none"> • ME1DutyCommander@fire.nsw.gov.au • ME1Admin@fire.nsw.gov.au • FireSafety@fire.nsw.gov.au 	
FR2	<p>2. Event Management Strategy – Appendix Q</p> <p>FRNSW notes that it is proposed to review and update the Emergency Management Plan for the SCG/SFS precinct. It is requested that FRNSW be included as a stakeholder on the review and update of the Emergency Management Plan.</p> <p>Recommended condition of consent provided below.</p> <p>C. <i>Fire and Rescue NSW is to be included as a stakeholder in the review and update the Emergency Management Plan for the Sydney Cricket Ground and Sydney Football Stadium precinct.</i></p>	Noted, the proposed condition is acceptable.
FR3	<p>3. Infrastructure Management Plan – Appendix U</p> <p>FRNSW notes that Fire Booster Connection locations are proposed as part of the Hydraulic Services Plan included as part of the Infrastructure Management Plan.</p> <p>FRNSW has not yet agreed to these locations, particularly in relation to the “2nd Fire Booster” and the “Alternative 2nd Fire Booster” as detailed in the Hydraulic Services Plan. As such FRNSW requests that the Fire Booster Connection locations for the Fire Hydrant and Sprinkler Systems, be subject to FRNSW approval prior to the location being finalised and the installation of these facilities.</p> <p>Recommended condition provided below.</p> <p>D. <i>The location of the Fire Booster Connections for the Fire Hydrant and Sprinkler Systems serving the Sydney Football Stadium, are to be approved by Fire and Rescue NSW prior to their location being finalised and the Fire Booster Connections being installed.</i></p>	Noted, the proposed condition is acceptable.
FR4	<p>4. Construction Management Plan – Appendix AA</p> <p>FRNSW notes that the Construction Management Plan makes no reference to the requirements of Clause E1.9 – Fire precautions during construction, of the National Construction Code 2019, Volume One, Building Code of Australia (NCC). This clause of the NCC requires the provision of firefighting equipment during the construction of a building, including the provision of fire hose reels and fire hydrants.</p>	<p>Noted, the proposed condition is acceptable subject to minor revisions to the wording as follows:</p> <p><i>The CEMP is to address the requirements of Clause E1.9 – Fire precautions during construction, of the National Construction Code 2019, Volume One, Building Code of Australia. The Fire Hydrant Booster Connections serving to the Fire Hydrants installed in the Sydney Football Stadium during</i></p>

No.	Extract	Response
	<p>It is requested that an amended Construction Management Plan, addressing the above, be required to be submitted prior to the commencement of construction. Additionally, the Booster Facilities for the fire hydrants provided in this regard, temporary or otherwise, are requested to be located adjacent to the vehicle entry to the construction site at Paddington Lane off Moore Park Road. Recommended condition of consent provided below.</p> <p><i>E. An amended Construction Management Plan is to be submitted that addresses the requirements of Clause E1.9 – Fire precautions during construction, of the National Construction Code 2019, Volume One, Building Code of Australia. The Fire Hydrant Booster Connections serving to the Fire Hydrants installed in the Sydney Football Stadium during construction, are to be located adjacent to the Paddington Lane entry to the site, from Moore Park Road.</i></p>	<p><i>construction, are to be located adjacent to the Paddington Lane entry to the site, from Moore Park Road or another location approved by Fire and Rescue NSW.</i></p>
FR5	<p>5. Fire Engineering DA Letter – Appendix MM</p> <p>FRNSW notes that it is proposed to develop a Fire Engineering Brief and Fire Engineering Report to address the Performance Requirements of the NCC for the project. It is requested that FRNSW be included as a stakeholder in the development of these documents. Recommended condition provided below.</p> <p><i>F. Fire and Rescue NSW is to be included as a stakeholder in the development of the Fire Engineering Brief and Fire Engineering Report for the development.</i></p>	<p>Noted, the proposed condition is acceptable subject to minor revisions to the wording as follows:</p> <p><i>Fire and Rescue NSW is to be consulted during the preparation of the Fire Engineering Brief and Fire Engineering Report for the development.</i></p>

1.18 Department of Planning, Industry and Environment Water – Strategic Relations (Former Department of Industry – Land and Water)

No.	Extract	Response
LW1	<p>The proponent must address the following</p> <ul style="list-style-type: none"> Identify the annual volumes of surface water and groundwater proposed to be taken by the activity (including through inflow and seepage) from each surface and groundwater source as defined by the relevant water sharing plan. 	<ul style="list-style-type: none"> The proposed development does not propose to take any surface or groundwater from surface or groundwater sources. There is no groundwater inflow or seepage as the proposal does not penetrate the water table. The stadium will continue to utilise the existing water extraction licence (no. 24543), of which bore water is collected and stored in an existing tank located within the SCG basement, from which it is available for distribution via pipework to the future SFS for irrigation of the playing field. No change is proposed to this arrangement and no water is proposed to be taken outside of the existing license.
LW2	<ul style="list-style-type: none"> Provide full technical details and data (where relevant) of: <ul style="list-style-type: none"> All surface and groundwater modelling; Surface and groundwater monitoring activities and methodologies; Management and disposal of produced or incidental water; monitoring groundwater levels to assess the high wet weather groundwater levels and its relation to the basement level; and Final landform of the site, including final void management (where relevant) and rehabilitation measures. 	<ul style="list-style-type: none"> Nine groundwater monitoring wells were installed during geotechnical testing, of which two remained in place for a period of eight months from July 2018 to March 2019 to measure fluctuations in groundwater levels over time, to understand the relationship between groundwater levels and rainfall and to allow for correction for atmospheric pressure. This information has been used to determine the groundwater levels that are identified in Appendix GG of the exhibited EIS, which are well below the maximum depth of the proposed basement. The Geotechnical Report at Appendix II provides further details of the groundwater monitoring wells and results. There are no surface water sources present on the site of the proposed development. The comment regarding 'final void management' is understood to be a mistaken reference to a mining project, and is not relevant to the proposed development.

No.	Extract	Response
LW3	<ul style="list-style-type: none"> Assess impacts on hydrology including water balance, surface and ground water sources (both quality and quantity), downstream water dependent flora and fauna, related infrastructure, adjacent licensed water users, rivers, streams, wetlands, estuaries, basic landholder rights, groundwater dependent ecosystems. 	<ul style="list-style-type: none"> Water balance – The Addendum Stormwater Response at Appendix N includes a technical note regarding water balance in relation to use of rainwater and water reuse on the site. Surface and groundwater sources – The proposed development will not interface with groundwater beneath the site or any surface water sources, noting that as identified below there are no existing rivers, streams, wetlands or estuaries in proximity of the site. Downstream water dependent flora and fauna – There are no important wetlands (SEPP44 or Ramsar sites) present in the development footprint, 1,500 metre buffer or downstream of the project, as identified in Section 2.2.7 of the EIS. Related infrastructure – The Stormwater Management Plan submitted at Appendix F of the EIS and discussed in Sections 4.13 and 6.10 of the EIS identifies the relevant infrastructure. Adjacent licensed water users – The SFS and SCG share a water use license, of which no change is proposed to the existing license terms. The bore is located outside of the project boundary for this development. The proposed development will not take any water outside of this existing license and as such it will not impact any surrounding licensed water users. Rivers, streams, wetlands and estuaries – There are no rivers, streams, wetlands or estuaries within the development footprint, and no important wetlands (in the meaning of SEPP 44 or Ramsar sites) within 1,500m or downstream of the site. This is detailed in Section 2.2.7 of the EIS. Groundwater dependent ecosystems – The Biodiversity Development Assessment Report prepared by Jacobs for the Stage 1 SSD DA, and resubmitted with the Stage 2 EIS as Appendix EE, completed a review of the federal Bureau of Meteorology's Atlas of Groundwater Dependent Ecosystems (GDE). It confirmed that the proposed development does not pose any risk to hydrological processes.
LW4	<ul style="list-style-type: none"> Due to the higher groundwater levels in the eastern side of the site further detailed sections showing the basement of the development and the high wet weather groundwater levels is required. Groundwater levels fluctuate seasonally and further detail such as groundwater level hydrographs should be provided to demonstrate dewatering will not be required. 	As detailed in the Geotechnical Report provided at Appendix II of the exhibited EIS, the groundwater monitoring wells were in place for a period of eight months to capture data regarding seasonal fluctuations in groundwater levels. The monitoring concluded that there appears to be little or no response to rainfall at the locations of the wells. The overlay of the proposed development footprint in Drawing GW1 of Appendix GG makes clear that the development is not occurring at the location of the highest levels in the north-eastern corner, and the Groundwater Assessment confirms that proposed structures are located 5 metres or more above the groundwater level. Accordingly, the existing drawing is considered appropriate and accurate.
LW5	<ul style="list-style-type: none"> Assess any potential cumulative impacts on water resources, and any proposed options to manage the cumulative impacts. 	<ul style="list-style-type: none"> The site is permitted to utilise 20ML of bore water per year under the existing water extraction licence (no. 24543). No change is proposed to this maximum, and as such there will be no change to the existing approved cumulative impacts of water extraction. The Groundwater Assessment at Appendix GG of the exhibited EIS confirms that the proposal is unlikely to have any impacts on the groundwater system. Accordingly there are no cumulative impacts. The Addendum Stormwater Response at Appendix N of the RTS Report identifies the opportunities for potable water savings, assessing how the redeveloped stadium can minimise the demand on potable water and, therefore, the cumulative impacts of operating the stadium. The proposed rainwater capture and reuse can offset 10 months of flushing toilets, urinals and

No.	Extract	Response
		facilities. The development replaces an existing stadium in an urbanised area, and accordingly no cumulative impacts are predicted.
LW6	<ul style="list-style-type: none"> A detailed site and consolidated water balance should be provided outlining water quantity and water source for the construction and operation of Stage 2 of the Sydney Football Stadium. If the detailed site water balance identifies a requirement for surface or groundwater take, a Water Access Licence must be obtained. 	<p>There is no proposed surface or groundwater take proposed and no Water Access Licence is required. An assessment of the pre and post-development water flows, including the existing and proposed potable, non-portable and stormwater connections, has been assessed in the Stormwater Management Plan submitted at Appendix P of the EIS and the Addendum Stormwater Response at Appendix N of the RTS Report. It is emphasised that no water is proposed to be taken outside of the existing bore water license and utility connections either during the construction or operation of the stadium. The Groundwater Assessment at Appendix GG of the exhibited EIS confirms that the proposal is above the groundwater table and will not impact on groundwater flows or quantities.</p>