



Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

CONTACT

Chris Bain Director – Strategic Planning cbain@ethosurban.com (02) 9956 6962

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This document has been prepared by:

This document has been reviewed by:



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Chris Bain 4 September 2021 Anna Nowland Not reviewed, as yet

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Ethos Urban Pty Ltd
ABN 13 615 087 931.
www.ethosurban.com
173 Sussex Street, Sydney
NSW 2000 t 61 2 9956 6952

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Executive Summary

Venues NSW (VNSW) is proposing to modify the existing approval for Stage 2 of the Sydney Football Stadium (SFS) redevelopment (SSD 9835) by introducing a village community space, event plaza and multi-level car park (the proposal) to complement the Sydney Football Stadium, the SCG and adjoining Moore Park and Centennial Parklands.

The following planning outcomes are of relevance to VIA and are noted:

- the Precinct Village is intended to enhance the visitor experience when events are held at the Sydney Football Stadium and Sydney Cricket Ground, as patrons will be presented with greater opportunities for participating in dining, natural play, performing arts and events, and the like
- the Precinct Village will also provide greater amenity to the overall Sports and Entertainment Precinct outside of events for use by the community creating a multi-use hub with community playground, restaurants, and cafés
- the development responds to the strategic mandate of Venues NSW as a statutory authority under the Sporting Venues Authorities Amendment Act 2020.

As this is a modification, existing Secretary's Environmental Assessment Requirements (SEARs) issued in respect of SSD 9835 remain relevant to the proposal.

The SEARs required a comprehensive and detailed investigation of visual impact matters. In accordance with these SEARs, two VIAs have previously been prepared for the SFS redevelopment. Both concluded that on the balance of relevant considerations and subject to appropriate mitigation measures, the redevelopment would have an acceptable visual impact.

Consistent with the two stage process established by the industry standard 'Guidelines for Landscape and Visual Impact Assessment' (version 3) (GLVIA3), the initial scoping stage for this modification has identified that due to its nature, in particular its comparatively small scale, a fresh VIA is not required. Rather, the evidence base for the previous VIAs in the form of Land and Environment Court compliant photomontages and their key findings and conclusions remain valid.

On this basis, focussed assessment was undertaken against key issues identified as part of the scoping stage. The key issues included its overall visibility from the public domain and its relationship with Moore Park and residential premises on the northern side of Moore Park Road.

The key findings of the assessment are that:

- relevant to planning principles for the consideration of visual impact established by the NSW Land and Environment Court (LEC) under *Tenacity Consulting v Waringah* [2004] NSWLEC 140 (*Tenacity*), the proposal complies with relevant planning controls and can be considered to represent skilful design. On this basis, it is a reasonable proposal within the meaning of this term established by *Tenacity*
- the retention of most existing, established vegetation along the site's perimeter and within Moore Park itself will effectively screen much of the proposal from view from the Moore Park Road, Driver Avenue and Moore Park public domain
- by replacing a large, at-grade carpark with outdoor sport and recreation and ancillary food and beverage uses, the proposal is more compatible with the overall visual character of the SFS precinct and represents an improved visual outcome
- the siting of the proposed tennis courts and ancillary amenities block between the UTS Sydney Australia building, the Rugby League Central building, the SFS and new built form largely screens most of these elements from the public domain, in particular from Moore Park Road and residential properties on its northern side and from long range, axial views along Driver Avenue to the south

- the establishment of a large, curated and publicly accessible open space at the highly visible western edge of the site significantly improves the relationship of the site with the adjoining Moore Park, in particular through a more compatible landscape and visual character. The combination of curated parkland and small pavilion buildings references the visual character of parts of the broader Moore Park and Centennial Park parkland complex
- new built form is of a scale, form, orientation and detail that ensures it will not be a prominent new element in the landscape when viewed from Moore Park. In particular, while under one roof, its separation into three distinct pavilion forms at the ground plane with pedestrian movement spaces in between further breaks down its appearance of scale.

On this basis the proposal does not give rise to new, significant and unacceptable visual impacts. Considered in conjunction with these earlier VIAs, it is considered that the requirements of the SEARS have been satisfied. On this basis, and subject to the mitigation measures recommended, the proposal can be supported on the ground of visual impact to the public domain.

1.0 Introduction

On 6 December 2018, the then Minister for Planning approved a concept development application and concurrent early works package (SSD 9249) to facilitate redevelopment of the Sydney Football Stadium.

The concept approval established the maximum building envelope, design and operational parameters for a new stadium with up to 45,000 seats for patrons and allowing for 55,000 patrons in concert mode. The concurrent Stage 1 works, which were completed on 28 February 2020, facilitated the demolition of the former SFS and associated buildings.

Stage 2 of the Sydney Football Stadium (SFS) Redevelopment (SSD 9835) was approved by the Minister for Planning and Public Spaces on 6 December 2019. Stage 2 provides for:

- construction of the stadium, including:
 - 45,000 seats (additional 10,000 - person capacity in the playing field in concert mode) in four tiers including general admission areas, members seating and corporate / premium seating;
 - roof cover over all permanent seats and a rectangular playing pitch;
 - a mezzanine level with staff and operational areas;
 - internal pedestrian circulation zones, media facilities and other administration areas on the seating levels;
 - a basement level (at the level of the playing pitch) accommodating pedestrian and vehicular circulation zones, 50 car parking spaces, facilities for teams and officials, media and broadcasting areas, storage and internal loading areas;
 - food and drink kiosks, corporate and media facilities; and
 - four signage zones.
- construction and establishment of the public domain within the site, including:
 - hard and soft landscaping works;
 - publicly accessible event and operational areas;
 - public art; and
 - provision of pedestrian and cycling facilities.
- wayfinding signage and lighting design within the site;
- reinstatement of the existing Moore Park Carpark 1 (MP1) upon completion of construction works with 540 at-grade car parking spaces and vehicular connection to the new stadium basement level;
- operation and use of the new stadium and the public domain areas within the site for a range of sporting and entertainment events; and
- extension and augmentation of utilities and infrastructure.

SSD 9835 has been modified on five previous occasions:

- MOD 1 amended Conditions B14 and B15 to satisfy the regulatory requirements of the Contaminated Land Management Act 1997;
- MOD 2 approved the design, construction and operation of the Stadium Fitness Facilities;
- MOD 3 approved design refinements to the western mezzanine and introduced a new condition to facilitate approval of signage details within the approved signage zones;
- MOD 4 relocated the approved photovoltaic array from the SFS roof to the Level 5 plant room roofs and revised the approved sustainability strategy; and
- MOD 5 updated plan references and dates in the Instrument of Consent.

A sixth modification which seeks approval for the fit out and operation of the SFS' eastern mezzanine for the Sydney Roosters Centre of Excellence (MOD 6) was placed on public exhibition by the Department of Planning, Industry and Environment between 19 August and 1 September 2021.

2.0 Precinct Village and Car Park

2.1 Vision

Venues NSW (VNSW) is proposing to introduce a village community space, event plaza and multi-level car park to complement the SFS, SCG and adjoining Moore Park and Centennial Parklands. The proposed development will facilitate the permanent closure of the EP2 on-grass parking areas within Moore Park opposite the MP1 car park and enable its use for open space purposes consistent with the Moore Park Masterplan.

The vision for the Precinct Village and Car Park is set out below:

“The Precinct Village and Car Park provides a platform and canvas for an exceptional community asset and iconic design, that visually and physically connects to the adjacent Moore Park East and Kippax Lake. It provides patrons with quality café and dining experiences in an idyllic parkland setting and well-being play and relaxation nodes which engage with all ages. An event plaza, connected to the Stadium plaza provides a seamless opportunity for greater patron and community engagement through non-event and event day functions” (Architectural Design Statement, Cox August 2021).

2.2 Location

The Precinct Village and Car Park is proposed to be located on the land west of the SFS, currently approved under SSD 9835 as the MP1 Car Park. It will extend to Moore Park and Driver Avenue and will adjoin the existing UTS, Rugby Australia and NRL Central buildings, all of which are to be retained and do not form part of the project site. A Location Plan is provided at **Figure 1**.

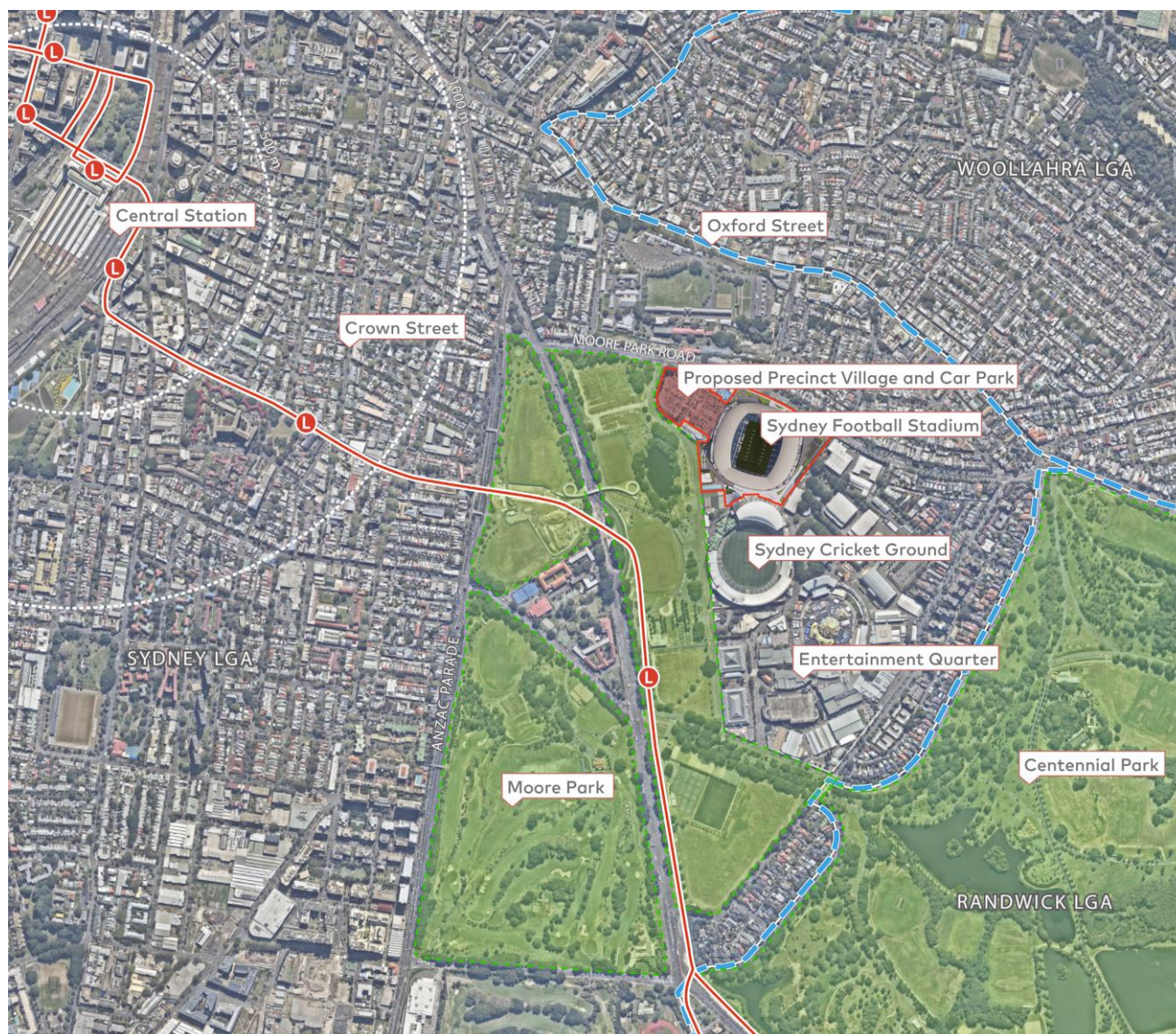


Figure 1 Precinct Village and Car Park Location

Source: Cox

2.3 Development Description

The Precinct Village and Car Park has been designed to align with the conditions and commitment established within SSD 9835, particularly relating to delivering a LEED Gold rated sustainable precinct, and will include:

- 1,500 space multilevel carpark below ground level with the following access arrangements:
 - 1 x egress point onto Moore Park Road to be used on event days only;
 - 1 x two-lane access point from Driver Ave to be used on event and non-event days; and
 - dedicated area within the car park for operation/servicing vehicles.
- Reconfiguration of the currently approved drop off requirements for the elderly and mobility impaired.
- Free flow level pedestrian access to and from the SFS concourse from Driver Ave and Moore Park Road.
- Electric car charging provision.
- A versatile and community public domain, comprising:

- provision for 4 x north-south orientated tennis courts on non-event days with the potential to become an event platform on event days;
- children's playground;
- 1,500m² cafe / retail / restaurants with associated amenities in a single storey pavilion (6 metre) low level;
- customer service office and ticket window; and
- vertical transport provisions.
- Utilities provision augmentation.

Figure 2 illustrates the proposed Precinct Village and Car Park concept. Refer to the Architectural Design Statement (Cox, August 2021) and landscape plans (Aspect, August 2021) for further details.

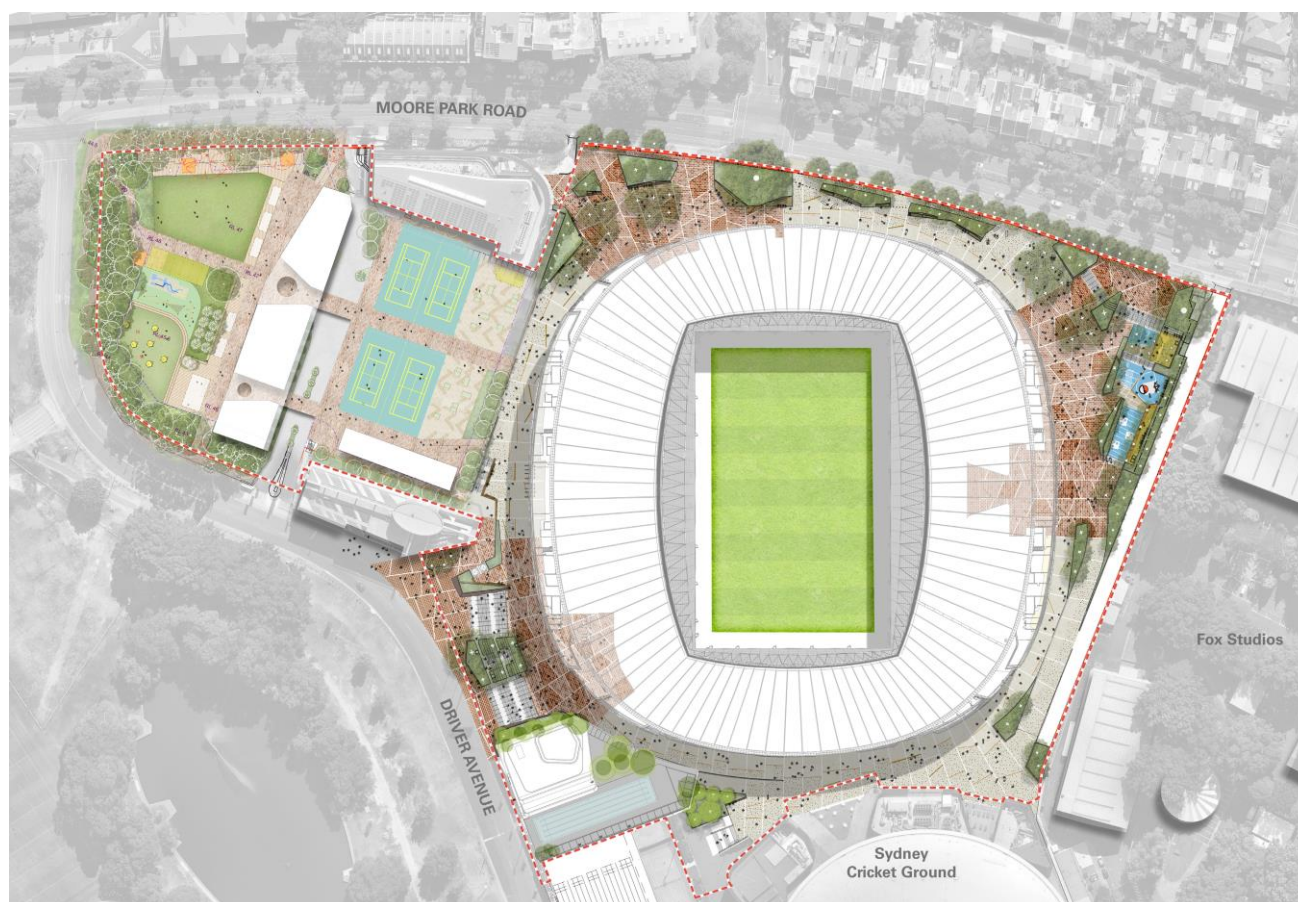


Figure 2 Precinct Village and Car Park Development

Source: Cox

2.4 Proposed Operation

The Precinct Village is proposed to be accessible from 8am to 11pm to align with the approved operating hours for the SFS as contained in Condition A19. As well as this, the tennis court operating hours are proposed to be the same as the operating hours for the recently approved Stadium Fitness Facilities contained in Condition A56, as these courts will likely form a complementary facility to be used by SCGST Members and their guests.

On non-event days, the cafe / retail / restaurants and customer service office and ticket window components of the Precinct Village operating hours are proposed to be:

- 7am and 10:30pm Monday to Saturday

- 7am and 7pm on Sundays.

The car park is proposed to be automated, replicating the existing arrangements at the nearby Entertainment Quarter and will be accessible 24 hours a day, 7 days a week.

With respect to anticipated events and types of activity, consistent with Condition of Consent A18, the use of the public domain areas within the Precinct Village on event days will be documented in the Event Management Plan currently under preparation. Consent for any stand-alone events (particularly on non-event days) that are not captured by Conditions A17 and the Event Management Plan will be subject of a separate future approval.

2.5 Delivery

The Precinct Village and Car Park is proposed to be delivered in two stages:

- Stage 1, herein referred to as the East Car Park, consists of the area between the Rugby Australia and NRL Central buildings, immediately adjacent to the SFS concourse
- Stage 2, herein referred to as the West Car Park, consists of the residual area immediately adjacent to the proposed East Car Park, bounded by Driver Ave and Moore Park Road.

The East Car Park is proposed to be delivered ahead of the opening of the SFS in 2022. The West Car Park is proposed to be delivered after the SFS opening, sometime in 2023.

3.0 Proposed Modifications

To facilitate the Precinct Village and Car Park, SSD 9249 and SSD 9835 are required to be modified. The proposed modification to SSD 9249 (concept development application) has been submitted under separate cover. SSD 9835 is proposed to be modified to facilitate construction, fit out and operation of Precinct Village and Car Park as described above.

4.0 Purpose of this Report

This visual impact assessment (VIA) report has been prepared to support the Precinct Village and Car Park modification.

As this is a modification, existing Secretary's Environmental Assessment Requirements (SEARs) issued in respect of SSD 9835 remain relevant to the Precinct Village and Car Park project. As is shown in **Table 1**, the SEARs required a comprehensive and detailed investigation of visual impact matters. In accordance with these SEARs, two VIAs have previously been prepared for the SFS redevelopment. Both concluded that on the balance of relevant considerations and subject to appropriate mitigation measures, the redevelopment would have an acceptable visual impact.

Consistent with the two stage process established by the industry standard 'Guidelines for Landscape and Visual Impact Assessment' (version 3) (GLVIA3), consideration was first given to the proposal's potential for significant visual impact on views identified of being of importance under the earlier VIAs. As can be seen in **Figure 4**, **Figure 5** and **Figure 6**, due to its siting, scale and nature, it was found that there was a minimal likelihood of such an outcome.

On this basis, a fresh VIA is not required. Rather, the evidence base for the previous VIAs in the form of Land and Environment Court compliant photomontages and their key findings and conclusions remain valid.

As part of this VIA, focussed assessment was undertaken against key issues identified as part of the scoping stage with a particular focus on areas closer to the site, including from Driver Avenue looking north and east towards the site

Table 1 SEARS relevant to visual impact

Secretary's Environmental Assessment Requirements	Report Section
Key issue 6: Visual Impact	
Provide a detailed visual / view impact analysis that considers the impact of the proposed stadium (compared to the demolished building(s) on the site and the approved envelope) when viewed from the public domain and key vantage points surrounding the site. This is to include a written description of the view pre-demolition of stadium on the site, the likely impact and justification of the proposal and any required mitigation measures. The view locations and methodology for the analysis must be prepared in consultation with the Department	<p>This has previously been addressed by the previous VIA prepared by Ethos Urban in 2018, as well as the addendum VIA for the stadium fitness facilities in 2020. This included agreement on view locations and methodology with the Department.</p> <p>For this proposal, these SEARs are addressed to the extent relevant as follows:</p> <ul style="list-style-type: none"> • Part 9: consider the impact of the proposal when viewed from the public domain and key vantage points surrounding the site • Part 7: include a written description of the existing visual environment • Part 9: identify likely impacts • Part 9: justify the proposal • Part 10 – 'Mitigation measures': identify required mitigation measures
Provide details of all visual amenity impacts on the surrounding occupiers of land	This is addressed in Part 9 of this report
Provide details of the management and / or mitigation measures in case of the identified adverse visual amenity impacts (if any) on the surrounding occupiers of land	This is addressed in Part 10 – 'Mitigation measures' of this report
Plans and documents	
View analysis including a comprehensive Visual Impact Assessment Report, photomontages and architectural renders, including from those from public vantage points, surrounding heritage items and from locations where private views are affected	<p>It is considered that the photomontages prepared for the previous VIAs prepared by Ethos Urban in 2018 and 2020 show potential visual impact of the proposal on key, well used and / or sensitive locations in the nearby public domain.</p> <p>Figure 8 and Figure 9 provide clear architectural renders for the proposal in its context</p> <p>Part 10 – 'Mitigation measures' makes recommendations for the address of interfaces with Driver Avenue</p>

This VIA report is to be read in conjunction with the following reports and documents:

- Planning Statement prepared by Ethos Urban (August, 2021);

- Architectural plans/elevations/sections and Architectural Design Statement, prepared by Cox Architecture (August, 2021);
- Design Integrity Assessment Report prepared by Cox Architecture (August, 2021);
- Landscape plans and Landscape Design Report prepared by Aspect (August, 2021);
- Transport Assessment prepared by JMT (August, 2021);
- Noise and Vibration Assessment prepared by Arup (August, 2021);
- Stormwater and Flooding Assessment prepared by Arup (August, 2021);
- Social/Economic Statement prepared by Ethos Urban (August, 2021);
- Heritage Impact Statement prepared by Artefact (August, 2021);
- Sustainability Assessment prepared by LCI (August, 2021);
- Security Statement/CPTED prepared by Intelligent Risks (August, 2021);
- Contamination Assessment prepared by Douglas Partners (August, 2021);
- Aboricultural Assessment prepared by Tree IQ (August, 2021);
- Wind Assessment prepared by Arup (August, 2021);
- Infrastructure Services Strategy prepared by Arup (August, 2021);
- Geotechnical Assessment prepared by Arup (August, 2021);
- Public Domain Lighting Assessment prepared by Arup (August, 2021)
- Accessibility Statement prepared by Before Compliance (August, 2021)
- BCA Compliance Statement prepared by Blackett Maguire Goldsmith (August, 2021).

In particular, the following SEAR is addressed in the Heritage Impact Statement prepared by Artefact (August, 2021) that forms part of the modification application:

- **Key issue 17 – Heritage:** Consider the impacts of the proposed stadium design on the settings and view lines for the above-mentioned heritage items and include appropriate management and / or mitigation measures to minimise adverse visual impacts

5.0 Background of visual impact assessment

Visual impact has previously been extensively considered as part of the redevelopment of the SFS.

The original VIA prepared by Ethos Urban in June 2018 concluded that the redevelopment would have 'an acceptable visual impact on a balance of relevant considerations'. It also made the following key findings:

- mainly due to the complex interrelationship of topography, built form and landscape, the distance of the proposal from viewpoints where this character can best be appreciated and its emphasis on horizontality, this VIA has found that the proposal would have a low to medium visual effect on the existing visual catchment;
- the proposal does have an impact on close range views obtained from the SCG and a medium range view obtained from Oatley Road. However, this impact is considered acceptable considering the intent of planning instruments, the role and continual evolution of the Moore Park sporting complex for large scale, organised sporting events and the presence of mediating elements between the viewer and the proposal;
- of particular note, the most sensitive nearby public asset, which is Centennial Park, is not affected by the proposal; and

- the proposal will also not visually detract from the broader Centennial Parklands pairing with the SCG to form a built backdrop floating above the crown of the existing Kippax Lake trees from highly utilised locations to the west.

A supplementary VIA was prepared by Ethos Urban in 2020 for the addition of the stadium fitness facilities. This VIA found that this proposal did not give rise to any additional, unacceptable visual impacts.

Consistent with the two stage process established by the industry standard 'Guidelines for Landscape and Visual Impact Assessment' (version 3) (GLVIA3), the initial scoping stage for this modification has identified that due to its nature, in particular its comparatively small scale, a fresh VIA is not required. Rather, the evidence base for the previous VIAs in the form of Land and Environment Court compliant photomontages and their key findings and conclusions remain valid.

On this basis, focussed assessment was undertaken against key issues identified as part of the scoping stage. These are outlined in Part 1 of this report.

6.0 Visual setting

As can be seen from **Figure 3**, the proposal will be located in the north-west corner of the larger SFS site.

This site is adjoined by public domain on three sides:

- to the north by Moore Park Road; and
- to the south and west by Driver Avenue.

To the east, the site is adjoined by the SFS's perimeter pedestrian circulation area. The SFS itself is located close to the eastern edge of the site.

To the north, land to the west of Oatley Road is most visually exposed to the site. This land includes the Victoria Barracks, a Sydney Water depot and residential flat buildings. Of note is the five (5) storey Paddington Barracks apartment complex. Due to Victoria Barracks which presents as an interruption to the typical fine grain street and block pattern of Paddington, views cannot be obtained into the site from north-south streets characteristic of parts of Paddington further to the east and west. This significantly reduces the visual exposure of the site to the public domain than would otherwise be the case.

To the south and west, Moore Park is most visually exposed to the site. In this location, Moore Park largely comprises grassed playing fields. It is noted that these playing fields are used as spill-over carparking during events at the SFS and other nearby venues. On this basis, the condition of these playing fields is often of a lower quality. It is however noted that the proposal enables the consequent revitalisation of this area, including removal of some carparking, by the Greater Sydney Parklands Authority. While indirect, this is nonetheless an important, positive visual impact that can be attributable to the proposal. An unpaved access road connecting to Driver Avenue provides vehicle access to these playing fields. Kippax Lake is located to the south of the site.

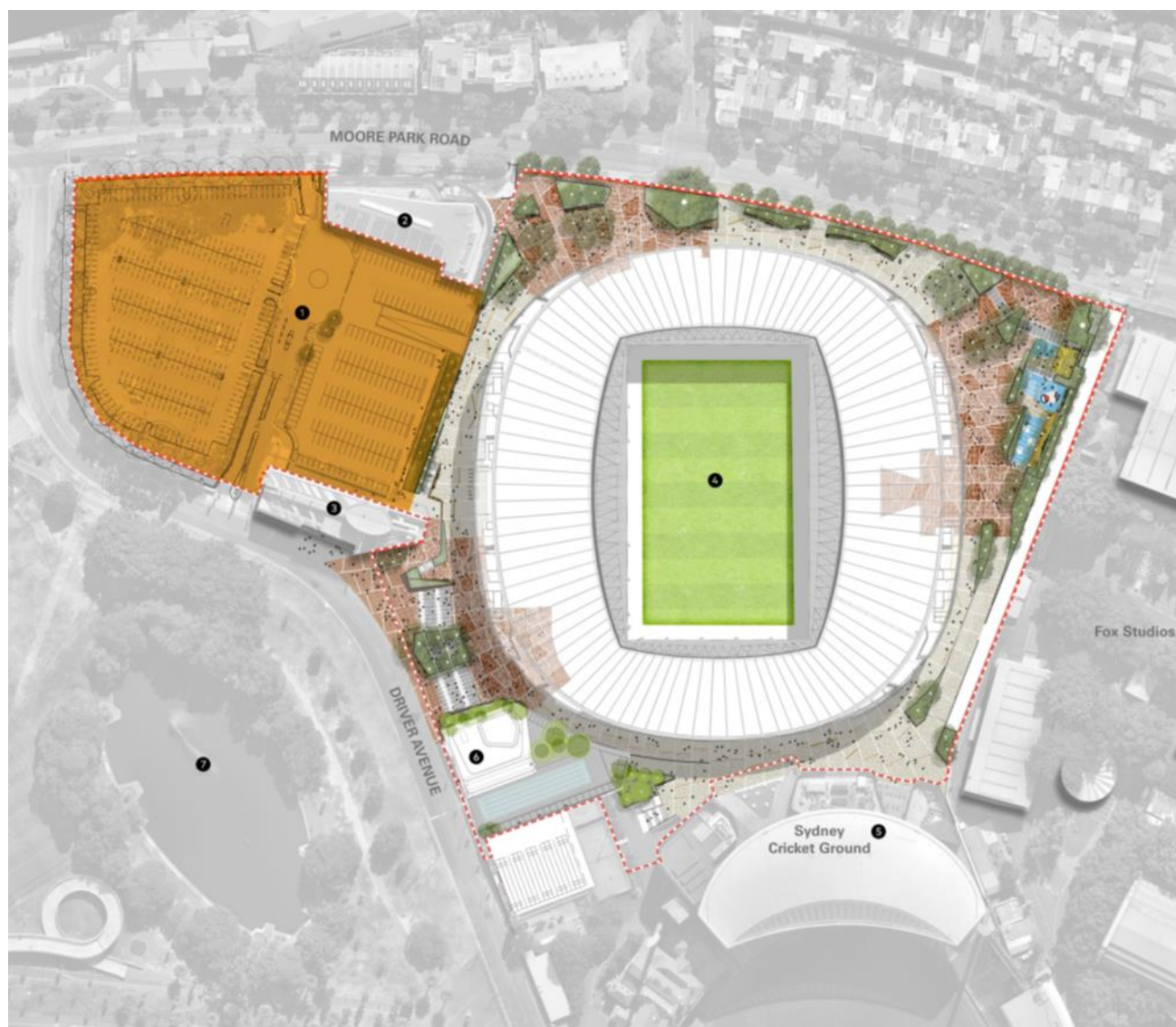


Figure 3 Location of the proposal relative to the remainder of the SFS site

Source: Cox

7.0 Existing visual conditions

The site is currently occupied by a construction compound and has been approved for a large, at grade car park under SSD 9835. .

Views into the site are heavily occluded.

The UTS Sydney Rugby Australia building located between the north-east part of the site and Moore Park Road. This building is of considerable scale, having a GFA of close to 12,000sqm and a height of 25m. In addition, its massing is aligned in an east-west configuration. This building screens views from a large part of Moore Park Road into the site.

Similarly, the National Rugby League Central building also screens views into the site from Driver Avenue to the south. In particular, it blocks linear and focal views obtained along Driver Avenue to the south.

The vehicular ingress and egress point and associated signage is a prominent part of the Driver Avenue streetscape.

Apart from these buildings, views from the surrounding public domain into the site are heavily occluded by existing, dense vegetation. Views are further occluded by the slightly raised RL of the carpark relative to Driver Avenue.

In addition to this, vegetation in Moore Park itself, in particular where clustered at the north-east corner of Moore Park Road and Driver Avenue and between the northern part of Kippax Lake and Driver Avenue, occludes views from the park to the site.

8.0 Aspects of the proposal relevant to visual impact

The purpose of the proposal is to strengthen the sports and recreation offering of the SFS precinct, in particular by providing an enhanced user experience that can also be used by nearby residents and provide a stronger, more integrated connection to the adjoining Moore Park.

As is shown in the Architectural Design Statement prepared by Cox Architecture, the physical expression of this purpose has been subject to an extensive and considered design process guided by a number of design principles.

Of key relevance to visual considerations, the proposal involves two key moves:

1. replace the approved MP1 at grade parking and relocate the EP2 on grass parking into a multi-level car parking structure; and
2. repurpose the ground plane with outdoor sport and recreation, event space, food and beverage and publicly accessible open space.

This repurposing comprises three (3) broad zones of activity:

1. **the eastern zone:** comprising new outdoor sport and recreation in the form of four (4) north-south oriented tennis courts and an adjoining amenities block;
2. **the central zone:** comprising around 1,500sqm of food and beverage (cafe / retail / restaurants) and customer service office and ticket window floor space in a single storey pavilion (6 metres), as well as 1 x egress point onto Moore Park Road and 1 x two-lane access point from Driver Avenue in the form of 'the Gully'; and
3. **the western zone:** comprising new publicly accessible open space, including a children's playground.

Linking these zones together is a new east-west aligned pedestrian promenade that provides a new connection to Driver Avenue, and on to Moore Park Road.

9.0 Key visual impact considerations

It is considered that the following are relevant visual impact considerations:

- reasonableness of the proposal
- extent of visibility
- comparison with existing visual conditions
- consistency with surrounding, existing visual character;
- scale, form and massing
- relationship to Moore Park

- relationship to residential properties fronting Moore Park
- detailed design considerations.

9.1 Reasonableness of the proposal

While typically applied in cases of view loss or blocking, the planning principles for visual impact established by the LEC under *Tenacity Consulting v Waringah* [2004] NSWLEC 140 (Tenacity) can also reasonably be applied in circumstances such as this where the SEARS require consideration of broader visual impact.

The key test for acceptability of visual impact is the reasonableness of the proposal that is causing the impact. This comprises two tests:

- whether the proposal complies with planning controls; and
- whether the proposal constitutes skilful design.

As is shown in the Planning Statement prepared by Ethos Urban, the proposal complies with relevant planning provisions for the Precinct.

The Architectural Design Statement prepared by Cox Architecture shows that the proposal has been subject to a rigorous and considered design process. In particular, the Design Integrity Assessment confirms the Design Integrity Panel has reviewed the proposal and supports the scheme from a design excellence perspective. On this basis, it is considered to represent skilful design. The concept of skilful design was established under *Tenacity Consulting v Waringah* [2004] NSWLEC 140 (Tenacity) as a key test in judging the reasonableness of visual impact, and means a design that can 'provide the applicant with the same development potential and amenity and reduce the impact on the views of neighbours'.

Finding

Relevant to planning principles for the consideration of visual impact established by the NSW Land and Environment Court (LEC) under *Tenacity Consulting v Waringah* [2004] NSWLEC 140 (Tenacity), the proposal complies with relevant planning controls and can be considered to represent skilful design. On this basis, it is a reasonable proposal within the meaning of this term established by Tenacity.

9.2 Extent of visibility

The previous VIAs undertook an assessment of the SFS's potential visual impact on well used or particularly sensitive locations in the nearby public domain. As can be seen in **Figure 4**, **Figure 5** and **Figure 6** (which were approved views under this VIA), while the SFS is noticeable in views from these locations, due largely to the mitigating effects of distance, screening vegetation and the curated natural landscape character of Moore Park, the SFS was assessed as not causing significant, unacceptable visual impact on views currently obtained from these locations.

These figures also clearly show that established vegetation in Moore Park will effectively screen the proposal. While the proposal will be more visible from less well used and significant locations on the perimeter of Moore Park at Driver Avenue, the screening effect of retained (refer **Figure 7**) and additional vegetation (an additional 64 trees for a tree replacement ratio of 3:1) at the site's perimeter, the open space nature of much of the site and the comparatively low scale of new built form when seen in the context of the will likely result in the proposal not being a dominant or overbearing element in the landscape.



Figure 4 **Visibility from the Anzac Memorial**



Figure 5 View from the Albert 'Tibby' Cotter Walkway bridge



Figure 6 **View from Kippax Lake**



Figure 7 Tree retention and replacement

Source: Cox

Finding

The retention of most existing, established vegetation along the sites perimeter and within Moore Park itself will effectively screen much of the proposal from view from the public domain.

9.3 Comparison with existing visual conditions

While largely screened from view from the adjoining public domain, the existing construction compound is nonetheless a visually detracting element in the surrounding landscape considering its predominant sporting and parkland setting.

As can be seen in **Figure 8**, the car park as proposed by the current modification will be partially relocated underground and any above ground portions will be screened by landscaping and façade treatment. Together with its replacement by uses that are consistent with this character represents an in-principle improvement to existing visual character.

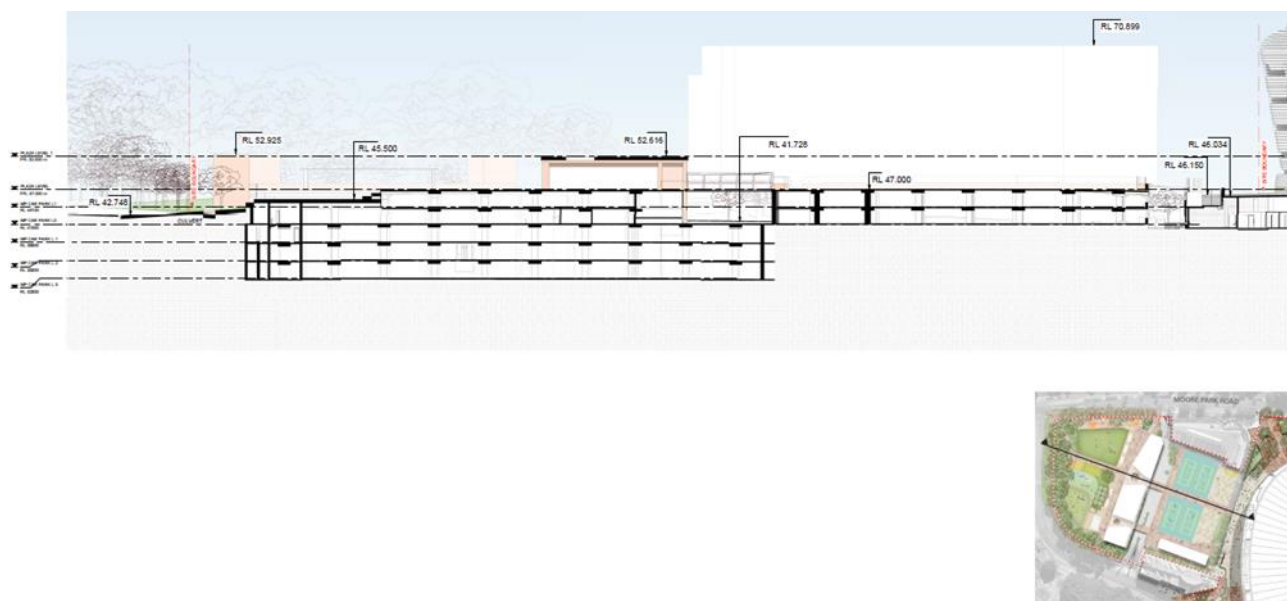


Figure 8 Cross section of site showing the underground carpark

Source: Cox

9.4 Consistency with surrounding, existing visual character

Together with the adjoining Sydney Cricket Ground, the Sydney Football Stadium is an integral part of the Moore Park sporting complex. Established in the 1880s, this complex has continually evolved to provide sporting venues first of metropolitan and then of international significance. The proposal is consistent with this role.

As can be seen from **Figure 9, Figure 10, Figure 11, Figure 12 and Figure 13**, the proposal integrates well into its surrounding visual landscape. In particular, the visual dominance of curated, largely grassed, publicly accessible open space at the site's north-west corner adjacent to Moore Park combined with the smaller, permeable form of the food and beverage pavilion is consistent with much of the visual character of Moore Park. This provides greatly enhanced visual integration between the site and Moore Park when considered against the existing situation.



Figure 9 Artist's impression of future view looking south-east towards the proposal from the corner of Moore Park Road and Driver Avenue

Source: Cox



Figure 10 Artist's impression of future view looking east towards the proposal from Moore Park near Driver Avenue

Source: Cox



Figure 11 Artist's impression of future view looking north towards 'the Gully' from Driver Avenue
Source: Cox



Figure 12 The proposal seen in its visual context viewed from the south-east
Source: Cox



Figure 13 The proposal seen in its visual context viewed from the north-west

Source: Cox

Finding

The replacement of an existing construction compound and approved, large, at-grade carpark with outdoor sport and recreation and ancillary food and beverage uses is both more consistent with the overall character of the SFS precinct and represents an improved visual outcome.

9.5 Scale, form and massing

As can be seen in **Figure 14** the proposal has a substantially smaller scale compared to adjoining built form to the north in the form of the UTS Sydney Rugby Australia building and the east in the form of SFS.

These buildings, and in particular the SFS, will be visually prominent in views obtained from Moore Park Road and Driver Avenue. As in most instances the proposal will be seen as part of a broader landscape that includes these features, the proposal will appear as a substantially lesser scale element.

Figure 15 show how the scale of built form is further broken up by pedestrian passageways and openings in the roof. **Figure 16** shows how built form will be softened by substantial landscaping in the foreground of views obtained from the east within the close range.

1. UTS Sydney Rugby Australia
11,860m² GFA / 25m H
2. National Rugby League Central
6000m² GFA / 19.5m H
3. Sydney Football Stadium
4. 600m² GFA / 6m H
5. 700m² GFA / 6m H
6. 400m² GFA / 6m H
- Total F&B GFA at plaza level only
1700m²
8. Tennis courts pavilion
470m² GFA / 4.5m H
9. Tennis courts / Event space
5260m²

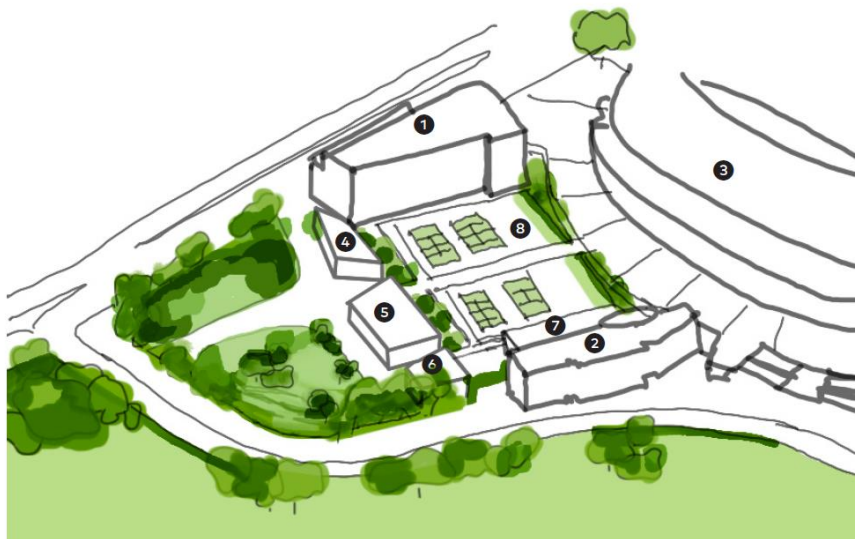


Figure 14 Scale and massing

Source: Cox



Figure 15 Artist's impression of future view showing the food and beverage pavilion

Source: Cox

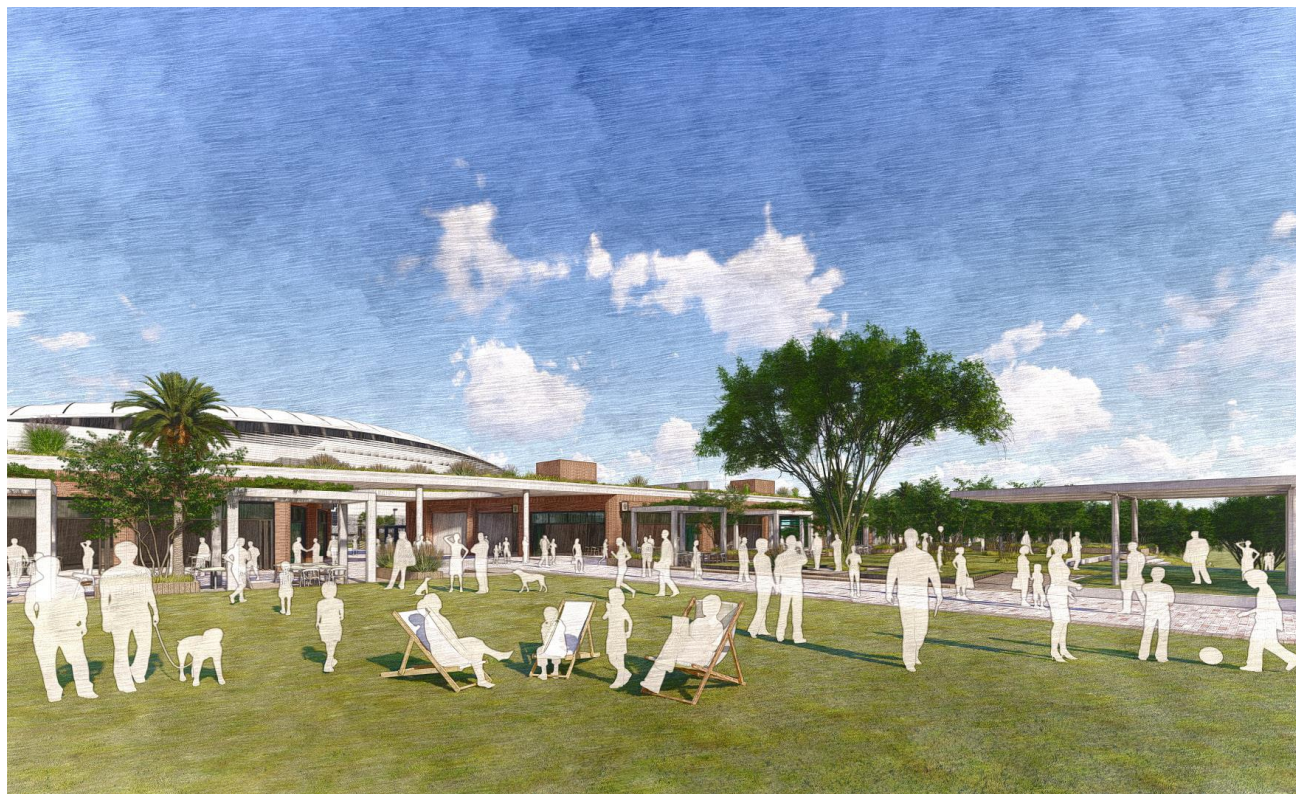


Figure 16 Artist's impression of future view showing the lawn and open space

Source: Cox

9.6 Relationship to Moore Park

As is shown in the Aborigicultural Assessment prepared by Tree IQ, the proposal involves the retention of existing significant perimeter vegetation. While separate to this proposal, the majority of existing vegetation along the Driver Avenue of Moore Park will also be retained (only seven will be removed).

The replacement of the at grade carpark with a largely passive, green and publicly accessible open space western end provides a more compatible visual character and integration.

9.7 Relationship to residential properties fronting Moore Park

As has already been noted, most of the site will be screened from view from Moore Park Road by the large UTS Sydney Rugby Australia building.

In particular and in combination with effective lighting management (refer to the Lighting Strategy prepared by Arup and provided under separate cover), this will largely screen the proposed tennis courts and their ancillary amenities building from view from existing residential properties on the northern side of Moore Park Road.

The proposed new food and beverage pavilion will be low rise (6m in height) and oriented perpendicular to Moore Park Road. Combined with the distance between the closest dwellings and the pavilion, it is expected that the pavilion will not be a prominent new element in the landscape when viewed from dwellings located to the north.

It is noted that due to its height, it is conceivable that some dwellings in the upper levels of the Paddington Barracks apartment complex may have glimpses to the western part of the site. While these would likely be heavily filtered due to the screening effect of vegetation in Moore Park Road and the perimeter of the site, it is expected that any such views would mainly be to new open space, and would

represent an improvement on that of the approved at grade carpark. In addition, the pavilion's proposed green roof would also provide an enhanced visual condition.

Finding

The siting of the proposed tennis courts and ancillary amenities block between the UTS Sydney Australia building, the Rugby League Central building, the SFS and new built form largely screens most this element from the public domain, in particular from Moore Park Road and residential properties on its northern side and from long range, axial views along Driver Avenue to the south.

The establishment of a large, curated and publicly accessible open space at the highly visible western edge of the site significantly improves the relationship of the site with the adjoining Moore Park, in particular through a more compatible landscape and visual character. The combination of curated parkland and small pavilion buildings references the visual character of parts of the broader Moore Park and Centennial Park parkland complex

New built form is of a scale, form, orientation and detail that ensures it will not be a prominent new element in the landscape when viewed from Moore Park. In particular, while under one roof, its separation into three distinct pavilion forms at the ground plane with pedestrian movement spaces in between further breaks down its appearance of scale.

9.8 Detailed design considerations

Due to its potential for great visibility from the public domain and the difference in levels between the site and parts of the public domain, design detail at the edges of the site is important for visual impact outcomes. In particular, the following aspects are key:

- transition to the adjoining footpath level
- the treatment of 'the Gully', including vehicle ingress and egress
- materiality.

Design detail for these aspects has been guided by the following relevant design principles. These are appropriate and fully supported from a visual impact perspective.

Table 2 Relevant design principles

Design principle	Detail
Local connections	Create seamless and legible public connections through the site to the surrounding parklands and neighbourhoods of Paddington, Surry Hills and Darlinghurst, while reinforcing existing and proposed connections which surround the site
Seamless connection to parkland	Create a seamless integration with the surrounding parklands within and throughout the precinct and destination amenity. The precinct celebrates the parkland setting and allows the parkland to take precedent
Built form and materiality	Built form to be scaled relative to the UTS building, significant fig trees located on Driver Avenue, and the built form of Moore Park Road and Driver Avenue. A 'campus in the park' morphology will drive the figure-ground disposition. Built form to relate to the materiality of the context - the predominant built form material should be brick - crafted and detailed in a contemporary manner

9.8.1 Edge conditions

Consistent with the design principles a key move is to create an active edge in the form of a 'green interface to parklands including kids play, water play and passive enjoyment'.

Figure 17 and **Figure 18** show this proposed treatment.

From a visual impact perspective, the proposal is a substantial improvement on existing conditions and the approved carpark as it:

- gently negotiates the inherent gradient difference through steps, including providing opportunities for casual seating
- softens built form at the edge through well considered landscaping and materiality.



Figure 17 Moore Park terraces and turf area

Source: Cox



Figure 18 Parkland lawn, timber terraces and compliant meander

Source: Cox

9.8.2 Vehicle ingress and egress and the condition of the Gully

The site is currently approved for an at-grade vehicle access-way that connects at its northern end to Moore Park Road and at its southern end at Driver Avenue.

To successfully negotiate the carpark and at-grade levels, the design concept proposes the creation of 'the Gully'. This will include an open lightwell for vehicular movement and daylight/ventilation/landscape, with primary pedestrian vertical circulation to be via glazed lifts and open stairs. **Figure 19** shows precedents for the treatment for 'the Gully'.

This is a well-considered response to the challenge presented by the carpark entry, and represents a superior visual outcome to a conventional carpark entry and provides for visual depth and interest.



Figure 19 Precedent examples for treatment of 'the Gully'

Source: Cox

9.8.3 Materiality

Under the design principle of 'built form and materiality', Cox has stated that built form is to relate to the materiality of the context, and that the predominant built form material should be brick crafted and detailed in a contemporary manner.

Figure 20 and **Figure 21** provide an overview of this materiality.

This approach is supported to address visual impact.



Figure 20 Proposed materiality

Source: Cox



Figure 21 Precedent examples for materiality

Source: Cox

9.9 Does the proposal give rise to new, significant and unacceptable visual impacts

It is noted that as the site adjoins the State heritage listed Moore Park, the surrounding visual context has a higher sensitivity to change than would ordinarily be the case. However, it is further noted that due to the long established presence of significant and visually prominent sporting and recreation uses on the eastern side of Driver Avenue, the site is not of particular sensitivity to the nature of change being proposed. Considering the scale of the proposal, it is rather more granular aspects of the proposal such as edge conditions and materiality that are of most importance in terms of addressing sensitivity.

Magnitude of change is highly localised. When seen from the immediately adjoining public domain of the western part of Moore Park Road and the northern part of Drive Avenue, the magnitude of change will represent an ongoing but reversible change of a moderate scale occurring over a restricted area. On this basis, where viewers are aligned with the proposed break in perimeter vegetation to accommodate the new pedestrian connection to Driver Avenue, the proposal can be considered to be a noticeable change. Due to the retention of perimeter vegetation and the nature of use of Moore Park Road and Driver Avenue in these locations, the proposal can be considered to be a perceptible change from other parts of Moore Park Road and Driver Avenue adjoining the site.

As has been shown in the earlier VIAs and **Figure 4**, **Figure 5** and **Figure 6**, the proposal will represent an imperceptible change from selected, well used and significant locations in the broader nearby public domain.

For these reasons and subject to the recommended mitigation measures, it is considered that the proposal does not give rise to new, significant and unacceptable visual impacts.

10.0 Mitigation measures

There are three broad types of mitigation measure appropriate to visual impact:

1. avoid
2. minimise
3. offset.

This is generally consistent with the principles for the management of environmental impacts in the GLVIA3 (part 3.37).

Under the GLVIA3 (part 4.21), there are a number of stages in the development process when mitigation measures should be considered. Of relevance to this proposal are the following:

- primary measures: considered as part of design development and refinement
- secondary measures: considered as part of conditioning a development consent.

As has been outlined in the design documentation, in particular the Architectural Design Statement, prepared by Cox Architecture (August, 2021), the proposal has been the subject to a rigorous technical process that has included consideration of visual impact matters. This has resulted in the incorporation of a number of primary measures appropriate to the nature of the proposal (e.g., siting and massing / form measures) that seek to avoid and minimise any potential significant adverse visual impacts.

These include:

- siting measures: such as locating the proposed tennis courts screened by the UTS building, Rugby building and the new low rise, linear pavilion
- orientation and massing / form measures: such as orienting the new food and beverage pavilion to be perpendicular to Moore Park Road and separating the pavilion into three distinct elements with pedestrian circulation area located in between providing permeability and reducing the appearance of building bulk.

The incorporation of these mitigation measures have been critical to the determination of acceptable visual impact. On this basis, it is not considered necessary to make further fundamental or otherwise large-scale amendments to the proposal in its current form to satisfactorily manage visual impact.

On this basis, secondary measures should be focussed on detailed architectural matters. As has been discussed, edge conditions, the treatment of 'the Gully' and materiality are key, relevant matters. It is recommended that in this regard:

- edge conditions
- the Gully
- materiality.

11.0 Conclusion

Consistent with the two stage process established by the industry standard 'Guidelines for Landscape and Visual Impact Assessment' (version 3) (GLVIA3), the initial scoping stage for this modification has identified that due to its nature, in particular its comparatively small scale, a fresh VIA is not required. Rather, the evidence base for the previous VIAs in the form of Land and Environment Court compliant photomontages and their key findings and conclusions remain valid.

On this basis, focussed assessment was undertaken against key issues identified as part of the scoping stage. The key issues included its overall visibility from the public domain and its relationship with Moore Park and residential premises on the northern side of Moore Park Road.

The key findings of the assessment are that:

- relevant to planning principles for the consideration of visual impact established by the NSW Land and Environment Court (LEC) under *Tenacity Consulting v Waringah* [2004] NSWLEC 140 (*Tenacity*), the proposal complies with relevant planning controls and can be considered to represent skilful design. On this basis, it is a reasonable proposal within the meaning of this term established by *Tenacity*
- the retention of most existing, established vegetation along the sites perimeter and within Moore Park itself will effectively screen much of the proposal from view from the public domain
- the replacement of a large, at-grade carpark with outdoor sport and recreation and ancillary food and beverage uses, the proposal is both more consistent with the overall character of the SFS precinct and represents an improved visual condition to what currently exists
- the siting of the proposed tennis courts and ancillary amenities block between the UTS Sydney Australia building, the Rugby League Central building, the SFS and new built form largely screens most this element from the public domain, in particular from Moore Park Road and residential properties on its northern side and from long range, axial views along Driver Avenue to the south
- the establishment of a large, curated and publicly accessible open space at the highly visible western edge of the site significantly improves the relationship of the site with the adjoining Moore Park, in particular through a more compatible landscape and visual character. The combination of curated parkland and small pavilion buildings references the visual character of parts of the broader Moore Park and Centennial Park parkland complex
- new built form is of a scale, form, orientation and detail that ensures it will not be a prominent new element in the landscape when viewed from Moore Park. In particular, while under one roof, its separation into three distinct pavilion forms at the ground plane with pedestrian movement spaces in between further breaks down its appearance of scale.

On this basis the proposal does not give rise to new, significant and unacceptable visual impacts. Considered in conjunction with these earlier VIAs, it is considered that the requirements of the SEARS have been satisfied. On this basis, and subject to the mitigation measures recommended, the proposal can be supported on the ground of visual impact to the public domain.