

6 September 2023

To whom it may concern,

This letter represents a submission to the consultation process *Sydney Football Stadium (SFS), Modification 7 Changes to Concert Restrictions SSD-9249 (Concept and Stage 1)*. I am making this submission on behalf of the Australian Professional Leagues (APL), operator of the Isuzu UTE A-League Men and Liberty A-League Women.

Introduction

The proposed Modification Applications seek to permit the SFS to:

1. host up to 20 concerts per calendar year;
2. allow concert sound checks to occur later in the evening to better suit operational requirements;
3. increase the maximum concert length from 5 hours to 10 hours to allow for 'Live Aid' style events, for no more than 2 concerts per calendar year; and
4. have an exemption to the concert curfew which would allow for hosting of the official Mardi Gras after-party.

This submission will mostly focus on item 1, that is, the increase in the maximum concerts that can be held at SFS in any calendar year.

APL fully recognises the need for and importance of Sydney hosting major live events. These events add vibrancy and cultural benefit to Sydney and New South Wales while also making a significant economic impact.

In that context, APL has no major objection to the increase in the annual cap of major concerts held at the SFS. Critically though, APL seeks a strong commitment by the NSW Government through its major venue operators, Venues NSW, to effectively consult on a regular basis with APL over any proposed major concerts held at SFS. Such consultation, undertaken well in advance of major concert scheduling, allows APL to minimise any further fixturing risks and ensure both APL and stadium tenants Sydney FC are not commercially disadvantaged.

A-Leagues at SFS

From the establishment of the A-League in 2005, SFS has hosted home fixtures for Sydney FC. This arrangement will continue into the foreseeable future with all of Sydney FC's mens games and some of its womens games hosted at the stadium.

The A-League season generally starts in October with the women's regular season concluding in April followed by a finals series and the men's regular season concluding in May also followed by a finals series.

Currently, the stadium hosts 13 Sydney FC men's regular matches per season along with any finals hosted by Sydney FC. This may increase over coming years with the addition of expansion teams into the competition. The Sydney FC women's team divide their home fixtures between smaller community stadiums in Sydney and SFS. In 2022/23, they played four games at SFS (as double-headers with the men's home fixtures) as well as two home finals matches.

A-Leagues fixturing of games

The process to set A-Leagues fixtures occurs over an extended period from June of every year with final fixtures announced in August. This is a highly complex and consultative process across our member clubs, stadia management across Australia and New Zealand and other A-Leagues stakeholders such as Football Australia, broadcasters and Professional Footballers Australia.

There are many factors that go into when and where games can be played including the needs of players, clubs and fans, likely weather conditions (particularly heat as many games are played in summer), ensuring teams play home and away with some consistency and, of course, stadium availability.

For games proposed for holding at SFS, stadium availability is a major factor. During parts of the A-Leagues season, co-tenants Sydney Roosters and the NSW Waratahs also hold games at the stadium. In addition, as the A-Leagues season occurs during the warmer months, fixturing needs to take into account SFS hosting major concerts which are invariably held within the same warmer months. Notably, these major concerts (and other major non-sport events held on the field) can require a week or longer occupation of the stadium including time for the turf to recover to be fit for football use.

By way of example, for the upcoming A-League 2023/24 season, the SFS was unavailable for six full weekends (including a blackout of three consecutive weekends) across the A-Leagues' 26 week season. Introducing more concerts at SFS will inevitably further reduce the flexibility in fixturing.

Of particular importance is that many games hosted by Sydney FC at SFS are marquee games for the league including Sydney Derbies against Western Sydney Wanderers or 'Big blue' matches against arch-rival Melbourne Victory. They attract large crowds and generate a fantastic atmosphere. They are vital for the commercial viability of Sydney FC and APL. Any difficulty in fixturing these marquee games on the right dates, threatens this commercial success.

APL's position

As explained earlier in this submission, APL has no major objection to the increase in the annual cap of major concerts held at the SFS. We recognise the importance of Sydney maintaining its status as a vibrant global city. Providing greater opportunity to hold major concert events at Sydney's most modern major stadium will contribute to this vibrancy.

It is vital though, as a long-standing and major user/tenant of the stadium, that APL and its constituent club Sydney FC, are closely and regularly consulted over fixturing of major concerts and other non-regular major events at SFS. Fixturing of games at SFS is already highly complicated when taken into account with fixturing of other games across Australia and New Zealand.



The likely reduced availability of SFS due to additional major concerts being held there, will only increase the complexity and commercial risks both APL and Sydney FC could face. A regular and close consultation - well in advance of scheduling of major concerts - does, however, provide opportunity for us to minimise risks and, if absolutely necessary, consider alternative fixturing.

The future consultation will also need to take into account turf quality and preparation following major events held at the stadium. Installation of major infrastructure on the field for concerts and similar events often requires days of recovery and often full replacement with ready to play turf to be at a standard sufficient for professional football. While rugby union and rugby league games are not as affected by the quality of the field surface (and could viably play on the field the day after a concert), football can be enormously affected. In simple terms, this is because of the ball needing to more often roll along the ground compared to the rugby codes.

I thank you for the opportunity to contribute to this current consultation process and look forward to a response as well as any further communication on this important issue as it progresses.

Kind regards,

A handwritten signature in black ink, appearing to read 'D. Townsend', with a long horizontal stroke extending to the right.

Danny Townsend
Chief Executive Officer, Australian Professional Leagues