

7 September 2023

Our Ref: R/2019/2/L & R/2018/4/M
File No: 2023/488090
Your Ref: SSD-9835-Mod-8 & SSD-9249-Mod-7

Rebecca Sommer
Department of Planning and Environment
via Major Projects Portal

Dear Rebecca,

**Advice on Modifications – Sydney Football Stadium Concert Cap
SSD-9835-Mod-8 & SSD-9249-Mod-7**

Thank you for your correspondence dated 9 August 2023 inviting the City of Sydney (the City) to provide advice on the abovementioned modification applications in relation to the Sydney Football Stadium (SFS) concert cap.

The proposal seeks to amend SSD-9249 (Concept and Stage 1 SSD) and SSD-9835 (Detailed SSD) to allow for the following:

- **Amend the Concept and Stage 1 SSD** to increase the number of concerts from a maximum of 6 per annum (average of 4 p/a across any 5 year rolling average) to a maximum of 20 events per calendar year.
- **Amend the Detailed SSD to:**
 - Increase the number of concerts from a maximum of 6 per annum to 20 events per calendar year.
 - Amend rehearsal finishing times and sound tests from 7pm to 10pm.
 - Increase the maximum concert length from 5 hours to 10 hours for no more than 2 concerts per year; and
 - Allow an exemption to the concert curfew to allow the venue to host the Sydney Gay and Lesbian Mardi Gras after party.

It is noted that the City previously objected to both the original Detailed SSD for the new SFS (SSD 9835) and the recent modification (Mod 7) which proposed a new 1,500 space multi-level carpark, largely due to inadequate demonstration of sustainable transport planning and over-reliance on private car usage.

Notwithstanding this, having regard to the proposed modifications specifically and acknowledging the existing approvals that are in place, the City does not oppose the SFS being used for events. However, it is critical that key impacts including traffic,

parking and acoustic impacts are adequately mitigated and managed and not compounded by multiple events scheduled across the precinct at the same time.

As a global city, Sydney needs stadia infrastructure to host iconic concerts of scale, which boost Sydney's global brand and competitive advantage. The City's [Live Music and Performance Action Plan](#) notes a lack of suitable infrastructure for extra-large scale concerts in our local area.

Post lockouts and lockdowns we need to actively support Sydney's tourism industry and night-time economy to reclaim and build on its status as a global destination for culture and entertainment. Playing host to world-famous artists and acts is critical to this task. In particular, the opportunity to host the Mardi Gras afterparty at the SFS is a positive addition to this proposal and will provide new revenue options for Mardi Gras, which is an important community organisation and event.

The City recommends that consideration be given to a local content quota for concerts, which would be met through programming community events (such as Mardi Gras), Australian headline acts and NSW-based support acts in order to maximise benefits for the local contemporary music industry.

Notwithstanding the above, it is critical that the following key impacts be resolved as part of the Department's assessment.

1. Acoustic management

It is essential that a suitable framework is in place to continue to effectively manage sound levels from concerts, including increased sound volume resulting from the additional concerts per year and the extended sound test times and concert lengths.

It is understood that existing frameworks to manage noise will continue to apply to the development, including:

- Various conditions of consent, including the requirement for an **Operational Noise Management Plan** (ONMP). The approved ONMP requires notification for concert events, including letter box drops to identified sensitive receivers (Section 4.5.2 of the ONMP) and includes live sound monitoring utilising the Permanent Noise Monitoring System. This is one of the most sophisticated systems available and provides real time feedback, allowing operators to adjust sound system noise levels to maintain compliance with noise limits (Section 4.6.5 of the ONMP). This system must be maintained at all times with a log of individual events to which the system served.
- **Prevention Notices** issued by NSW EPA under the *Protection of the Environment Operations Act 1997* provide scope for the functioning of the site and a lawful pathway for desired noise outcomes to be achieved. Venues NSW appears to be seeking these to be varied by NSW EPA to align with the proposed modifications.

It is recommended that the ONMP be reviewed and updated to account for the proposed modifications. It should detail appropriate actions to ensure the future operations of the SFS comply with relevant controls and minimise amenity impacts to the local community as much as possible. The Department is strongly encouraged to require Venues NSW to send a notification letter to local residents with a full schedule of events and a name and contact number for reporting any issues. The continuation of the Permanent Noise Monitoring System is also recommended.

Regarding the Prevention Notices, variations of the existing notices may be sought from NSW EPA. This should be sought prior to approval, with the outcome of any variations informing decisions made regarding development consent conditions, which is in line with historical precedent. Conditions of consent and any lawful directions to take preventative actions must not be in conflict.

2. Traffic impacts and parking

As mentioned above, it is the City's view that the overall SFS redevelopment does not adequately address traffic impacts, given the amount of car parking to be provided on the site under the previous modification (Mod 7) approved by the Department.

However, when considering this modification specifically, it is acknowledged that the maximum number of patrons at any one event will remain capped at 55,000 and there are no changes proposed to parking numbers on the site.

There is ongoing concern amongst residents living around the stadium in relation to traffic congestion and illegal parking during events. It is therefore critical that traffic impacts are carefully considered and mitigated as part of this assessment.

As a minimum, the proposal must incorporate measures to encourage alternatives to driving, such as active and public transport to the precinct. The Department is strongly recommended to mandate integrated ticketing with public transport times for all major events at the stadium alongside increased public transport services for events and discouraging vehicles entering and exiting via Moore Park Road.

Management of people and vehicles must be in accordance with the required *Traffic Transport Management Plan*, *Green Travel Plan* and *Pick Up and Drop Off Management Plans for the precinct*.

3. Public domain and lighting requirements

Given the importance of incentivising public transport use, the existing lighting and wayfinding signage is to be reviewed from Anzac Parade and the light rail stop through to Moore Park to ensure these are adequate in facilitating the additional foot traffic resulting from more frequent major events.

Improvements to lighting and wayfinding should be implemented to ensure a safe pedestrian journey to and from public transport connections including Central Station.

Recommendations

In light of the above comments, the City provides the following key recommendations:

1. The existing Operational Noise Management Plan should be reviewed and updated to account for the changes sought under this proposal and detail appropriate actions to ensure the future operations of the SFS comply with relevant controls. It should keep a log of sound pressure levels of all events.
2. Any changes to the Prevention Notices issued by NSW EPA should be sought prior to determination. The outcomes of any variations should inform consent so that there is no conflict between the Prevention Notices and conditions of consent.

3. The proposal must incorporate active measures to encourage alternatives to driving, such as integrated ticketing with public transport for all major events.
4. The existing lighting and wayfinding between Anzac Parade (particularly the light rail stop) and the SFS must be reviewed and upgraded as required, to ensure safe pedestrian journeys during the more frequent major events.
5. Consideration should be given to a local content quota for concerts to maximise benefits for the local music industry. This would require programming community events (such as Mardi Gras), Australian headline acts and NSW-based support acts.

Should you wish to speak with a Council officer about the above, please contact Samantha Kruize, Senior Planner on 9265 9333 or at skruize@cityofsydney.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport