Ms Rebecca Sommer Department of Planning and Environment Sydney NSW 2000

6 September 2023

## RE: SYDNEY FOOTBALL STADIUM PROPOSED CONCERT CAP INCREASE DA SSD 9249 AND SSD 9835

Dear Ms Sommer,

We strongly object to Venue NSW's proposed modification of the Sydney Football Stadium DA SSD 9249 and SSD 9835, namely:

- Increase allowable number of concerts from a maximum of 6 per annum to a maximum of 20 events per calendar year
- Amend rehearsal finishing times and sound tests from 7pm to 10pm
- Amend the maximum concert length from 5 hours to 10 hours for no more than 2 concerts per calendar year; and
- Include exemption to the concert curfew to allow for the SFS to host the official Mardi Gras after-party

Venue NSW is purely seeking these modifications for their own self-interest to lift SFS economic return, and this is a blatant breach of what was agreed following extensive community consultation for the rebuild of the Sydney Football Stadium (SFS). Merely a year on from the opening of the SFS, Venue NSW is seeking overturn what was agreed with the community, namely that the SFS redevelopment would maintain the prevailing restriction on the number of concerts.

Undoubtedly, lifting the concert cap at SFS is definitely not in the best interests of greater Sydney. The Government was voted in to support the people of the western suburbs and give them greater access to cultural and sporting events. Increasing the SFS cap would result in a shift of up to an additional 16 concerts being held in the eastern suburbs, directly at the expense of the greater western suburbs population.

Accor Stadium at Homebush is a world class venue for music concerts. It is geographically located in the heart of Sydney, it has superior infrastructure to get patrons to and from the

venue (including superior public transport, a purpose-built road network and dedicated parking), it does not impact on residential amenity, and it can allow twice the audience to enjoy headline acts than SFS stadium can accommodate.

CommBank Stadium at Parramatta is another incredible venue to host music concerts, and importantly is also located in the epicentre of Sydney. Hosting additional music concerts at CommBank Stadium would align with the City of Parramatta's desire to become a world class city. We fully support Government's desire to create a vibrant and active nightlife in Sydney, but surely greater focus should be on western Sydney which is central to where the majority of the population are located and underserved?

Venues NSW should not be seeking to change the cap merely to justify the \$900 million rebuild of SFS. The case to rebuild the stadium was predicated on four concerts per year, not 20, and increasing music concerts should not be used to justify the rebuild. Claims that a 20 concert cap would bring in tens of millions annually also need to be validated. This simply does not take into account that revenue would be taken away from existing alternative venues such as Accor Stadium, and if there is demand/supply for additional concerts this revenue would be captured anyway if staged at alternative venues.

The four concert rule at SFS was thoughtfully put in place to take into consideration the traffic congestion and noise impact on the high-density local community. Since the rule was invoked 30 years ago, this local area has become even more densely populated, creating traffic and parking chaos each time music concerts are staged at SFS.

Before any modifications could possibly be contemplated, what is the parking plan for any such increase in concerts? The Government has a responsibility to preserve green spaces and protect the environment, but currently each time a major event is staged at SFS the green space located next to the stadium is being destroyed by the need to park cars. It is irresponsible to increase demands on the local area until a sustainable, environmentally responsible parking solution is available for SFS. Currently local driveways are dangerously being blocked with numerous events already staged in the area. The City of Sydney rarely patrol streets on event days to discourage driving to events.

The claim that the proposed modifications will result in no change to the magnitude of environmental effects is simply untrue. Irrefutably, the proposed modifications have not adequately addressed community issues such as traffic congestion and noise pollution. Despite superior acoustics and noise monitoring system in SFS, as proven with the existing four concert cap each time a concert is held there are noise pollution breaches. Extraneous noise sources, such as crowds cheering, excessive traffic often involving horns and drunken/loud behaviour at the conclusion of concerts are real issues for the local community. Communication of the event schedule to locals to "plan around these impacts" is not a mitigating solution – it does not solve significant traffic and noise pollution issues. What does solve traffic and noise pollution issues is locating concerts at purpose-built facilities in non-residential areas such as Accor Stadium at Homebush.

The local Moore Park and Centennial Park communities already take more than their fair share of noise and traffic disruption with numerous major cultural and sporting events held in the area each year and insufficient parking to support these events. Locally there are increasing ES Marks Athletics meets, Royal Randwick racecourse events, as well as Sydney Swans games at the SCG and SFS hosting matches for the Sydney Roosters, Sydney FC and the NSW Waratahs. Music concerts are frequently held at Horden Pavilion, on EQ oval and significant large-scale music festivals are also held within Centennial Park on multiple occasions throughout the year. On a per capita basis, this precinct already takes more than it's fair share of events, and these tax paying residents do deserve residential amenity and a parking solution before demand in the area is further increased.

Undoubtedly, the submissions by Venue NSW to increase the concert cap must be rejected. We fully support developing Sydney's cultural and entertainment offerings, however, the submissions for increasing the cap to 20 concerts at SFS is not in the best interests of local residents and more importantly nor is it in the best interests of greater Sydney. Voters in greater Sydney, not just the eastern suburbs, deserve a vibrant and active nightlife and the non-residential, purpose-built Homebush precinct is best positioned to take additional concerts.

We urge you to reject Venue NSW's proposed modifications in the interest of the people of NSW.

Kind regards,

Kirsty and Bryant Plavsic