

OBJECTION TO MODIFICATION 8 CHANGES TO CONCERT RESTRICTIONS ALLIANZ STADIUM

Application No. SSD9249Mod7
Main Project. SSD 9249

The following is an objection to this proposal.



A Andersons, AO, Architect
M.Arch.Yale FAIA NSW Architects No. 2822
0427 609 907, andrewpadd@gmail.com
10 ALEXANDER ST. PADDINGTON NSW 2021

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PRINCIPAL REASONS FOR OBJECTIONS

1. The increase of the cap on concerts from 4 to 20, together with other amendments, constitutes a seven-fold increase in highly intrusive noise, to be suffered by nearby residents.
2. With capacity for concerts at over 50,000 persons, there will be more than 800,000 additional visitors to the precinct, impacting on the amenity of the nearby streets.
3. On the nights of the Bruno Mars concerts (14-15 October 2023), traffic and public transport came to a complete standstill in Oxford St, Paddington at the conclusion of the event.
4. There is no discussion of how other locations operated by Venues NSW, such as Accor Stadium, Sydney Olympic Park, or Commonwealth Stadium Parramatta, both of which continue to hold successful concerts, could meet demand beyond the four-concert cap.
5. The proposal makes false claims about noise breakout. No quantification is provided as a comparison with the previous stadium. At the 'drop-in' consultative session the representative of Ove Arup Acoustics conceded that "if there is any reduction, it would not be discernible".
6. The proposed amendment to the cap, generating up to seven-fold increase in exposure to intrusive noise, seems barely credible from responsible government agencies. Is this an ambit claim designed to make the proponent look responsive to community protest, subsequently reducing the increased cap from 20 to, say, 10? If so, it makes a sham of the NSW Government Planning Process.

INTRODUCTION

I have lived at 10 Alexander St, Paddington since 1973, when the Sports Ground was the local football venue. In 1984, the Wran Government called for bids for a new football stadium, which was completed in 1988.

As the Assistant Government Architect, I presented a tender assessment report for this proposal to the Policy and Priorities Committee of the NSW Government. Although the successful proposal by Lend Lease was some 40% more expensive than the other short-listed bid, it was enthusiastically received by the Committee and especially by the Chairman of the then Sydney Cricket Ground Trust, Pat Hills, for what were considered, the building's outstanding design qualities.

Shortly after the opening of the building a cap of 4 concerts per annum was introduced to limit the exposure of nearby residents of Paddington, Darlinghurst and Centennial Park to the extremely loud and intrusive noise emanating from the venue when used for pop concerts. The City of Sydney introduced a noise monitoring system in surrounding streets and a residential parking scheme to protect the amenity of residents.

Notwithstanding the cap on the number of concert events, the noise impact on nearby residences is severe. The loud, low frequency beat of pop music dominates the acoustic environment making it impossible to have a quiet conversation, watch television or listen to music at normal noise levels.

Traffic congestion and attendance figures are far greater for concert events. Patrons at regular sporting events are familiar with local traffic and transport conditions, unlike attendees at pop concerts, who come from all over the metropolitan area, unfamiliar with local street patterns or public transport routes.

Some ten years ago, the SCG Trust began agitating for a replacement stadium to be built, asserting, among other things, that the building was unsafe even though a 2016 report to the SCG Trust estimated that as little as \$18m was required to address regulatory non-compliance, and it is believed that a number of studies were carried out to investigate a major upgrade estimated to cost some hundreds of millions, far less than the ultimate cost of the new stadium.

The decision to build a totally new stadium became a major issue raised by the NSW Labor opposition in the 2019 election campaign. In the event, the new stadium was completed in 2022 at a cost of \$828 and it is not surprising that the new Labor Government should seek to optimise the return on this massive investment.

In the Acoustic Report, which is part of the documentation for the new stadium DA, it is stated explicitly that the cap on the number of concerts (4 average/annum in a five-year period) would be maintained and that the noise breakout from the new building would be no greater than from the existing building. It states that the proposed PTFE fabric roof would be "acoustically transparent" and would have no mitigating effect upon the noise breakout.

I have enjoyed living in my neighbourhood for 50 years. Many of my neighbours have also lived here before the 1988 stadium was built.

In a press release of 3 May 2023, Minister for Sport, Steve Kampe, supporting the proposed modification, said:

“The Sydney Football Stadium is an \$828 million state of art venue, for it to be lying dormant and unused is an absolute shame. We need to remove the red tape that has caused this iconic venue to sit empty, when it should be hosting the world’s best performers.”

It is estimated that with an average weekly attendance of 23,000 for sporting events and 50,000 for four concerts, some 1,370,000 patrons would have attended the stadium, at over fifty events, since its opening on 28 August 2022, hardly “lying dormant and unused”.

It is galling to see the all-important limitation on the number of concerts, an essential feature of the operations of the stadium over the last 30 years, and the DA conditions of the new building, is seen as “red tape”.



10 Alexander St in 1973.

By no measure is Paddington, south of Oxford St, an entertainment precinct. There are just two pubs and no bars or restaurants in Moore Park Rd, and none in Cook and Lang Rds, Centennial Park.

10 Alexander St in 2023





The first ALLIANZ STADIUM (above), opened in 1988 was demolished in 2018 following a disingenuous campaign by the Sydney Cricket Ground Trust that it was unsafe, although an internal report said that only \$18m was necessary to upgrade the building for regulatory compliance. The cost of the new building was \$828m and its demolition strongly opposed by the Labour Opposition.



The second ALLIANZ STADIUM opened in 2022.

THE PROPOSAL

The proposed changes include:

- Increasing concert capacity from an average of 4 to 20 concert events per calendar year.
- Amending rehearsal finishing times and sound tests from 7pm to 10pm.
- Amending the maximum concert length from 5 hours to 10 hours for two concerts a year.
- Exemption to concert curfew to host the official Mardi Gras after party.

Assuming that these amendments to the operation of the stadium are fully utilised they constitute approximately SEVEN TIMES the exposure to intrusive noise levels experienced in nearby residential areas compared with the current situation. Section 1.4 of the Modification Report describes this as “a modest increase in the number of concerts hosted at the stadium”.

INCREASE IN EXPOSURE TO INTRUSIVE NOISE

This is calculated as follows:

- Increasing concerts from 4-20 per annum. *Five times current exposure.*
- Extending time for rehearsals and sound tests, one rehearsal for each pair of concerts by 3 hours (equivalent of six concerts). *One and a half times current exposure.*
- Increasing concert length from 5 to 10 hours for two concerts. *Equivalent to one half current exposure.*

This is the equivalent of some seven times the current exposure to highly intrusive noise.

While it is reasonable to be away from home six times a year (4 concerts – 2 rehearsals), it is totally unacceptable to be absent thirty times (2 concerts – 10 rehearsals).

ACOUSTIC IMPACT

At the “Community Drop-In Session #1” held on 5 June 2023, I had a lengthy discussion with the representative of Ove Arup Acoustics. I questioned a number of statements on the “Noise and sound management” panel on display at the meeting.

These include:

- A. “... a noise monitoring system has been installed to ensure noise levels do not exceed the approved maximum volume at surrounding residences...”

His response was that there would be no monitoring at residences because of the monitoring system incorporated in the building.

The noise levels from performances experienced at recent concerts are highly intrusive and no amelioration is proposed.

- B. “Penetrations in the facade have been limited to better contain sound and light impacts.”

This may be true up to a point, but there is a substantial gap around the perimeter of the building between the roof and wall-glazing, allowing significant noise breakout.

- C. “The new roof covers the entire seating bowl and is physically higher to better contain sound and light.”

He agreed that the PTFE membrane roof was effectively, acoustically transparent, and would have no impact in mitigating sound breakout.

In summary, he agreed that if there was any reduction in noise breakout it would not be perceptible.

It is of great concern that this PR material is disingenuous and gives the impression that noise breakout from concerts is reduced. The truth is that recent concerts have shown to be as intrusive as before and that a potential seven-fold in “exposure” is totally unacceptable.

If claims continue to be made that somehow the new stadium design ameliorates noise breakout, there should be some proper normative evidence of this.

TRAFFIC IMPACT - BRUNO MARS CONCERT 14-15th October 2022

At the 'Community drop-in' session on 5th June it was strongly asserted by the traffic consultant that concert performances had a more desirable profile than sporting events, as the modal split showed a higher proportion of attendees using public transport.

Data published by Allianz shows that 25 sporting events, from February to August 2023 attracted a total attendance of 578,401 or an average of 23,100 per event.

The Bruno Mars concerts on 14-15th October attracted 101,000 over two nights, or over 50,000 per performance, more than double the average number at a sporting event. Assuming similar numbers to those attending Bruno Mars, ten concerts in a six-month period would attract 500,000, almost the same as the 575,000 that attended sporting events.

This means that the proposed cap of 20 concerts has the capacity to almost double the visitor numbers to the precinct by an additional 1,000,000 in a calendar year, with all the attendant congestion and attendance. The 55,000 theoretical maximum concert audience, some 10,000 more than that of the sporting mode, would generate significantly greater traffic impact.

On the night of 14th October 2022, I caught a 333 bus at Circular Quay after a concert at the Sydney Opera House to travel home to Paddington at about 10:30pm. As the bus approached Oxford St at the southern end of Hyde Park, traffic became extremely slow and came to a complete standstill approaching Taylor's Square. After sitting in a stationary bus for some ten minutes, I decided to walk home.

The traffic was at a complete standstill all the way to Paddington and beyond. All the streets and back lanes in the vicinity of Oatley Rd, Renny St and Alexander St were clogged with cars with their engines idling. This was still the case well after midnight.

On 15th October, I did not leave home, but the congestion in the streets, in my neighbourhood, was similar to that of the night before.

I would encourage the proponents of the modification to obtain satellite data and any records the police or Sydney buses may have to take account of the impact of a 50,000 concert audience unfamiliar with traffic and transport when compared with regular attendees of sporting events.

CONSIDERATION OF ALTERNATIVE VENUES

The Modification Report give no consideration to the use of alternative stadia controlled by Venues NSW, other than three different options for the use of the Allianz Stadium. Given the devastating environmental impact of the seven-fold increase of intrusive noise for nearby residents and the near-doubling of visitor numbers, resulting from increasing the cap from 4 to 20 concerts per year, it would seem prudent to investigate the availability and suitability of alternative venues.

In a press release of 3 May 2023, Premier Minns states:

“Sydney is a global city, and we should be able to host global acts from around the world. The cap means NSW is missing out on millions of dollars a year in economic activity and the tourism and the jobs it brings with it”.

No quantification or evidence is offered regarding unmet demand. The Premier’s statement is clearly incorrect as Venues NSW controls both the Accor Stadium at Sydney Olympic Park and the Commonwealth Stadium in Parramatta, both of which are excellent venues and have successfully hosted successful pop concerts in the past and are continuing to do so.

Both stadia are located in Western Sydney, closer to the geographical centre of the Metropolis and would be more accessible to the population than Allianz Stadium, which is situated to the east of the Sydney CBD.

Given the ongoing rhetoric about the imbalance of events between the privileged Eastern Suburbs and the disadvantaged West, it would seem most appropriate to increase the number of events at both the Accor and Commonwealth Stadia.

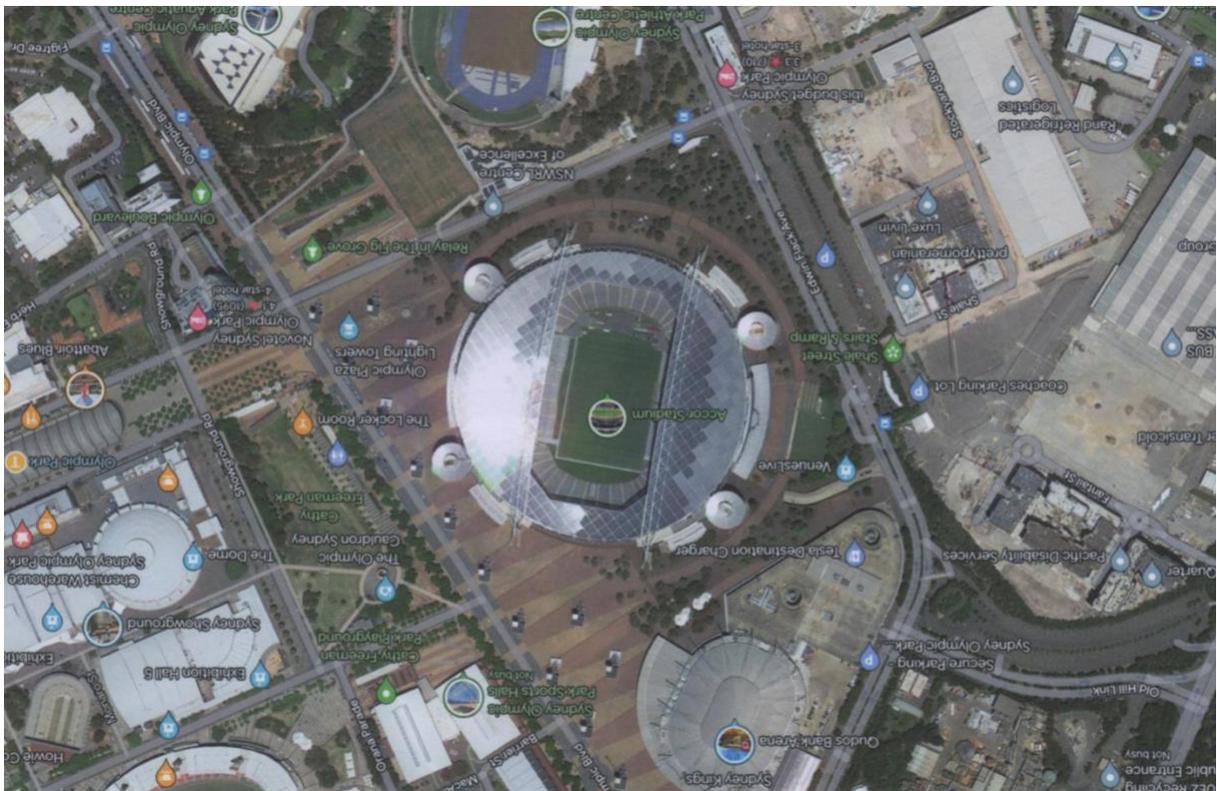
It would seem that there is spare capacity to meet the additional 16 concerts between the two venues. Accor has hosted three concerts in March and February this year and there are three more projected from October to December this year. It hosted five concerts in 2018. Accor Stadium, located at the centre of Sydney Olympic Park is well served by public transport, has ample parking, and the nearest residences are some 0.9km away in contrast with Moore Park Rd, Paddington, which has terrace houses immediately opposite the Allianz Stadium.

Commonwealth Stadium Parramatta is located a 15-minute walk from the Parramatta CBD and is reasonably well served by public transport. Residences, smaller in numbers, are further from the stadium than those in Paddington.

It is hard to believe that the 16 extra concerts proposed for Allianz could not be successfully held at Accor and Commonwealth Stadiums. Location of pop concerts at alternative venues would see no diminution in the economic benefits to the state and contributions to the night-time economy.



The ACCOR Stadium at Sydney Olympic Park can accommodate an excess of 80,000 patrons, is well served by public transport, and is 0.9kms from the nearest residence. It is easily accessible from all parts of the metropolitan area and has proven to be a successful venue for pop concerts.





The Commonwealth Stadium at Parramatta has successfully hosted major pop concerts and can accommodate more than 40,000 patrons in concert mode. Far fewer residences are affected by noise breakout than in Paddington and the stadium is within 15 minutes walking distance of the Parramatta CBD.



HEALTH IMPACT

I am 81 years of age and suffer from hypertension. I enjoy living in my house in Paddington with all the benefits its location offers.

I no longer own a car, have excellent mobility and walk to the local shops, parklands and often to the city. I even enjoy attending sporting events at the stadium.

However, I find the noise generated by pop concerts highly intrusive to the extent that listening to music, watching television or having a normal conversation is impossible in my house without the overlay of a compulsive bass beat. This is the case even with windows shut, as normal glass thicknesses are transparent to low frequencies.

I find this a highly stressful situation and usually try to be away from home when there is a pop concert playing. However, the proposed increase in the cap from 4 to 20 plus attendant activities makes this quite impracticable.

Attached is a medical certificate from one of my two GPs.

Moon Street Medical Centre

11 Moon Street
Ballina
NSW 2478

Phone:02 6686 2611
Fax: 02 6681 4114

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Dr Susan Tyler-Freer
MBBS,FRACGP,FACRRM,Clin Dip Palliative Medicine
291354JJ

Wednesday, 6 September 2023

Re: Mr Andrew Andersons
10 Alexander Street
PADDINGTON 2021
Tel: 93805867 0427609907
Date of birth: 5/7/1942

To Whome it May Concern:

I am writing to support my patient, Mr Andrew Andersons, age 81yrs who has mentioned to me that there is a proposal to increase the concert/events schedule nearby his home by 800%. He consulted me with questions about the probable impact on his physical and mental health, and I had to explain to him that we as a profession are increasingly concerned about excessive environmental exposures of exactly this nature. We know that impact mental health and physical health directly and indirectly, and given Andrew's sleep and cardiovascular issues, I am quite concerned that harm will come to him. My duty of care to provide age-specific prevention and health maintenance advice compels me to write to you to support his and the community's efforts to prevent this proposal from going any further.

Other experts can discuss the ecological impacts and sense of community, however I wish to state unconditionally that there will be negative consequences to the health and well-being of any community subjected to such treatment.

I am attaching a collection of articles should you wish to begin a bit of research on the matter. and I have advised Andrew to consult an Occupational Physician for expert advice if necessary.

Thank you for your consideration. If I can be of service, please don't hesitate to ask.

Sincerely,



Dr Susan Tyler-Freer

AN ENTERTAINMENT PRECINCT?

The documentation justifying the proposed amendment and various statements by politicians assert that the residents of South Paddington and Centennial Park acknowledge that they are living in an 'entertainment precinct' and that anyone moving to the area should be aware of that fact.

The reality is quite different. The area of Paddington, south of Oxford St and Centennial Park, along Lang and Cook roads, has only two pubs, one shop and no bars or food outlets. This is a total contrast with established entertainment precincts such as King St Newtown, Oxford St Darlinghurst, Campbell Pde Bondi Beach and the like.

Residents moving to the area, conducting due diligence, would be aware that the acoustic amenity of the surroundings of the Allianz Stadium has been protected by the cap of 4 performances of pop concerts per annum. This constraint was reinforced, at length, in the documentation of the DA for the new building.



Moore Park Road



Moore Park Road



Gordon Street



Moore Park Road



Oatley Road



Cook Road



Lang Road



Lang Road