



THE PADDINGTON SOCIETY Inc.
For Community and Heritage
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Attn Rebecca Summer,
Dept of Planning and Environment, Major Projects
7 September 2023

Re: State Significant Development
Sydney Football Stadium Modifications 7 & 8 – Changes to Concert Restrictions
40-44 Driver Avenue Moore Park **SSD-9249 & SSD 9835-Modification**

Dear Rebecca,

The Paddington Society welcomes this opportunity to submit our comments on the Changes to Concert Restrictions at the Sydney Football Stadium (SFS), Moore Park. Members of our community group are committed to preserving and enhancing the heritage and amenity of Paddington, which borders on the Park. The whole suburb of Paddington is directly affected by the Stadium and the activities that are held there.

We have objected many times in the past to the re-development of this outdoor, Tier 1 45,500 seat Stadium as being ill-located in relation to Greater Sydney, and a mis-fit of use, scale and bulk in our fine-grained, globally-valued, Heritage Conservation Area. The operation of a Tier 1 Stadium is essentially incompatible so close to a dense residential precinct, with adverse impacts of traffic, parking, anti-social behavior, lighting and noise.

We advocate that large concert events should be held at the more centrally located Accor Stadium at Homebush, with 83,500 seating capacity, which is distant from residential development, and well served by public transport. Its superior location is recognized by having no concert cap limit. We also advocate for smaller concert events in the local area to be held in the Hordern Pavilion (5,500 capacity) which is enclosed and so has much less impact on residents.

This modification seeks to:

- *increase allowable number of concerts from a maximum of 6 per annum (average of 4p/a across any 5 year rolling average) 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 to allow for 'Live Aid' style events, for no more than 2 concerts per calendar year; and*
- *include an exemption to the concert curfew to allow for the SFS to host the official Mardi Gras after-party.*

We have the following objections:

1. This Modification negates the previous consultation process for the SFS Stadium DA.

We have spent many years alongside other resident representatives on the SFS Community Consultative Committee (CCC), advocating for measures to mitigate this outdoor Stadium's

amenity impacts on residents, with some small gains such as the eventual removal of on-grass parking, and the introduction of integrated ticketing and use of satellite carparks for events. The DA impact assessment was based on predominately sporting event use with a commitment to a 4 per year average concert cap.

This concert cap was introduced in the 1990s as a recognition of the huge impacts that outdoor concerts in particular have of noise, light, traffic, parking, and anti-social behaviour on residents' amenity and on Park users. In that regard, little has changed since so, that this cap is still justified– see points below.

To increase the concert and rehearsal frequency and duration to the extent proposed negates all this previous consultation, makes residents despair of getting a real hearing in planning assessment, and reduces our trust in the applicant, Venues NSW and in the NSW Government to manage infrastructure impacts on the community.

2. Intensification of Use not Justified

Outdoor (non-enclosed) concerts have huge amenity impacts since they are attended by many more people – often 55,000 at this Stadium, in comparison to a 'major' sporting event of 35,000-42,000 people – are much longer in duration than a sporting event, are noisier with disturbing distorted noise, and are often in summer (since sporting events tend to be in winter) when residents' windows are open, making noise impacts greater.

The Modification proposes to increase concert frequency from 4 per year (average) to 20 per year at the SFS – a more than five-fold increase at the SFS and almost one concert per fortnight on average, or one concert per weekend for the warmer half of the year. The proposal also seeks to increase concert duration. Each event includes days for bump in and bump out, with additional noisy rehearsal and sound checks. In the current proposal, rehearsals and sound tests are proposed to be extended from 7pm to 10pm with no cap on noise limit nor the frequency or duration of these, allowing noise-intrusive events more than once per week on average over a year, and more in summer.

This represents many, many more frequent obstacles to the peaceful enjoyment of our homes that Sydney residents are surely entitled to. The Society argues that this also represents an intense cumulative impact from a base only just tolerable now, so that the applicant's 'historical context of events in the area' argument is not valid.

The applicant's argument that the benefit to Sydney's night time economy outweighs resident amenity to this extent undermines the whole rationale of NSW Environmental & Planning Act which seeks to balance costs and benefits, and augurs ill for future planning assessment in NSW if profit trumps amenity. The argument fails as outdoor concerts are totally inappropriate in residential areas; it is a conflict in land use.

The proposal justifies the increase as a bringing in line with other similar size stadia in other capital cities.

However, our research shows the following:

- Suncorp Stadium in Brisbane (52,000 seats): has approval for a temporary increase from 6 to 12 concerts per year in 2023 & 2024 only, to aid post-Covid recovery.
- Marvel Stadium in Melbourne (53,000 seats), with a retractable roof: has approval for 6 concerts per year, with additional concerts by permit only.
- Optus Stadium in Perth (60,000 seats): has approval for 3 year period for max 10 concerts per year for max 5 hour duration apart from 2 per year of max 8 hour duration, a max of

4 concerts per month and a max of 3 hours between 9am & 9pm for rehearsals & sound checks

What is proposed here is a much greater intensification of concert use compared to stadia in other capital cities, with the only justification for this frequency being the increased revenue one.

In addition, Sydney has the under-used, better located, Accor Stadium at Homebush available for large concerts, unlike Brisbane and Perth.

3. Noise Impacts

The SFS is an outdoor facility in regards to noise as the roof is well separated from the façade, allowing noise to affect nearby neighbours.

Concert caps recognise that noise impacts on residents for outdoor concerts are much higher, and last longer than for sporting events. Increasing the frequency of concerts by five times is unfair on residents and much greater than caps for major Stadiums in other capital cities (see above). Further, the ARUP Acoustic Review submitted shows that the permitted concert noise level of 75dBA at Allianz is higher than for Stadiums at similar distances from residences (ie 70dBA at Marvel & Suncorp Stadiums) and much higher than the noise limit of 65dBA at SCG adjacent, which is further away from residents.

Any increase in the concert cap should mean a noise limit of 65dBA to be more tolerable to residents.

The increased impact of the proposed Mardi Gras after-party in SFS without any curfew is also unfair to residents, particularly in Moore Park Road, interrupting sleep. Venues NSW should retain the enclosed Hordern Pavilion location or consider the Sydney Cricket Ground venue (48,000 seats), rather than proposing their venue which is the closest to residents.

Concert rehearsals and sound tests can be as disruptive in noise as the concert itself. Surely these activities can be minimised in duration and sound levels for the sake of residential neighbours, and should only occur on one day at reasonable hours. Noise limits for these events need to be lower than for the concert itself and restricted to a reasonable duration of 3 hours, finishing at 7pm as currently, so as not to interfere with children's bedtime. We note that there are no rehearsal duration limits stated in the proposal, which leaves the possibility of full-volume, all-day rehearsals over many days, for each concert.

Noise monitoring needs to recognise the amplification and distortion effects of noise in a dense built environment; noise at up hill locations such as Renny St and west Gordon St in South Paddington can be worse than lower locations, so that these higher points need to be included in the monitoring.

Finally, the ARUP justification for increasing impacts, that the site has been an entertainment precinct for 150 years, does not take into account the vastly greater audience numbers and the vastly higher noise from modern sound amplification equipment, nor the long history of resident objections to high noise events.

4. Traffic Impacts

The JMT transport report confirms that for recent concerts, a third of the 55,000 patrons drive (not counting those dropped off), while the Stadium precinct has parking spaces for only 4,350. This leaves some 10,000 plus cars (depending on car pooling) trying to park in residential streets before a concert – noting that the entire population of Paddington is 12,700 (census 2021), with about a third of these in South Paddington. About half of Paddington residents have no garaging and park on-street, with on-street parking ordinarily at a premium. It is obvious that the extra 10,000 cars in South Paddington, Centennial Park and East Surry Hills cannot be accommodated, and only leads to unsafe parking and traffic practices, and traffic gridlock which is unfair to residents and deters patrons.

Accompanying any increase in concert cap, Venues NSW needs to clearly message concert and major sporting event patrons that local parking is not possible, to introduce event parking limits of 15 minutes for non-residents, and to help fund City of Sydney to police parking restrictions as well as fund police to manage traffic behaviour.

The drop off chaos associated with taxi and Uber drop off and pick up has not been managed, despite Venues NSW promise to the CCC to introduce a geo-fence to disperse this activity away from the immediate Stadium area and from the residential streets of South Paddington. Any increase in concerts should be conditioned with an effective geo-fence, as promised. All major events need to be programmed so that there are no double headers with other venues such as the SCG or the EQ Showring, when a potential of 100,000 plus patrons attend, bringing un-manageable impacts.

5. Social Impacts

The recent FIFA sporting events demonstrated that such events can be managed well with high public transport use, effective messaging, Moore Park Rd road barriers, litter cleanup and employment of marials to control crowd movement. Venues NSW needs to analyse and replicate this success.

Police should not be restricted to the Stadium site as occurs now, but should also be employed to police nearby residential streets in South Paddington, Centennial Park and East Surry Hills, for both dangerous traffic behaviour and anti-social behaviour in general.

The Society recommends that:

- Any increase in concerts should be limited to a temporary increase to 8 concerts per year for 5 hour duration, apart from 2 per year of 8 hour duration, a max of 2 concerts per month and a max of 2 hours between 9am and 7pm for rehearsals and sound checks, and occurring only up to 2 days before a concert, i.e. conditions similar to the Perth Optus Stadium operation (noting that this Stadium enjoys more sound spill protection, a superior location on a peninsula further from residential development, is served by excellent public transport, and is the only large Stadium in Perth. Matching their concert cap would mean more impacts on residents around Sydney Stadium than on residents around the Perth stadium).

This recommended cap is twice the current cap and represents a balance between residents, and local businesses and Venues NSW' desire for increased revenue.

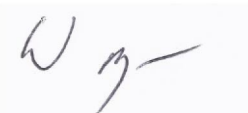
- All concert impacts are independently monitored and assessed over a 2 year trial period, managed through the CCC, and the concert cap reduced if necessary
- Permitted external noise levels should be 65dBA (not 75dBA as currently) to match the Sydney Cricket Ground permitted noise level adjacent.
- The Mardi Gras party if moved should be held at the Sydney Cricket Ground (further away) and have a reasonable curfew of 1pm.
- Noise monitoring points are increased to capture up-hill effects
- Lower permitted noise levels should apply to rehearsals and sound checks, and noise should be monitored as for the concert event itself; duration should be restricted to 2 hours finishing at 7pm
- Venues NSW employs police on concert days to monitor anti social behaviour and traffic offences, not only on the Stadium site, but in South Paddington up to Oxford St and East Surry Hills up to Crown St.
- Integrated ticketing to all concerts be a mandatory condition
- 15 minute non-resident event parking be introduced for Paddington South, Centennial Park and Surry Hills East residents (in line with Suncorp Stadium event parking restrictions), and that Venues NSW funds the City for extra traffic policing on concert days.
- A geo-fence for ride-share operators be located to force pick up and drop off to occur away from residential areas
- No double-headers with the Sydney Cricket Ground or the EQ Showring to be programmed

In summary, the location of the SFS in a residential area is totally inappropriate for outdoor concerts which have to be endured by thousands of residents. Any increase in concerts should be more modest, temporary and independently monitored. Any increase in concerts must be accompanied by better management of traffic, noise and social behaviour.

Venues NSW needs to allocate large events over its whole venue portfolio in a rational and fair manner.

Venues NSW needs to operate SFS Stadium events as a good neighbour, and not just for the short-term bottom line.

Yours faithfully



Will Mrongovius,
President The Paddington Society
Per Linda Gosling,
Executive Committee The Paddington Society