



Action for Public Transport (N.S.W.) Inc.

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Director - Social and Infrastructure Assessments
NSW Planning
Department of Planning and Environment
Locked Bag 5022
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Submitted via website

Submission on SSD-9835-Mod-8

Sydney Football Stadium Concert Restrictions

Introduction

Who we are

Action for Public Transport (NSW) or "APTNSW" is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

Twin submissions

This submission concerns a proposal to increase the maximum number of concerts permitted each year in the new Sydney Football Stadium ("SFS") at Moore Park.

On the advice of a member of the planning team, identical submissions are being made for SSD-9835 mod 8 and SSD-9249 mod 7. It is to be hoped that helps with assessment arrangements.

Discussion

The intention of the subject applications is to increase the maximum number of concerts per year allowed at SFS. It seems implicit that the actual number held will increase significantly because the new SFS is attractive to concert promoters. There is no explanation as to why the higher figure was not sought early in the project's development. Could it be that there has always been an intention to allow more concerts? If so, why wasn't the higher figure in the initial plans? Are modification applications seen as an easy route to gain approval for something of questionable merit that would not survive rigorous assessment? Since nothing seems to have changed in the short time since the SFS re-build was planned, we suggest that the present modification should be assessed as it should have been if included from the start.

Turning to transport, we note that the Anzac Pde light rail has limited capacity. Largely because of constraints in George St, the capacity of Circular Quay trams is about 7000 passengers per hour each way. Given that a well-attended concert could see 55000 patrons exit the SFS in about 20 minutes, the question is how much can the capacity between Moore Park and Central be bolstered by running extra trams? We would suggest that SFS's transport constraints make Olympic Park, which has:

- an on-site railway capacity of 25000 passengers per hour,
- ample road space for bus stops,
- a location much closer to the geographic centroid of Sydney and, importantly,
- no close neighbours,

... a more appropriate venue for concerts.

On the matter of careful assessment, we were struck to see EIS discussion of how noise levels emanating from the stadium, and therefore nuisance in residential areas around SFS, could be affected by the orientation of loudspeakers. That discussion ignores the point made elsewhere in the EIS that much of the nuisance is caused by sound in the 63Hz frequency band. Low frequency sound is much less directional than higher frequencies; orienting the loudspeakers will do very little to the distribution of low-frequency sound nuisance. Therefore, we wonder whether the EIS has been prepared with sufficient attention to detail.

Conclusion

In view of the matters set out above, we suggest that the proposal should be examined more carefully than in the EIS. We doubt that the proposal would then gain approval.

Jim Donovan
Secretary
Action for Public Transport (NSW) Inc.
