

## **OBJECTION TO APPLICATION FOR SYDNEY FOOTBALL STADIUM STAGE 2 – SSD - 9835**

### **Introduction**

I object to the application for Stage 2 of the Sydney Football Stadium redevelopment; the basis for my objection is set out below.

### **Context and Consideration**

My principal objection relates to how the new Stadium will be operated and what it will be used for in the future and what the impacts of that use will be on the amenity of the surrounding residential areas and areas of public parkland. I also have concerns in relation to the environmental impact of any proposed signage and external media screens. I deal with these issues as follows.

### ***Future Use of Stadium***

Condition C9 of the Development Consent for the Concept development which relates to the Operation of the Stadium - opens with the words “The future development application **must** estimate the maximum number of events” (my emphasis). It continues with the following – “The development application **must** identify and assess all impacts of additional number of events and concerts in excess of 52 event per year and six concerts (with an average of four per year over any five-year rolling period between the Sydney Football Stadium and the Sydney Cricket Ground).

At this juncture I would note firstly, that as far as I can establish from the documentation provided there is no basis for the “benchmark” figure of 52 events in the SFS; secondly, that there is no basis for the figure of 6 concerts in the SFS and the SCG. Indeed, in respect of the latter figure, it is my understanding that the relevant control on concerts in these facilities established under a Noise Prevention Notice issued by the then EPA in 2002 sets a limit of 4 concerts in those two venues in any calendar year. A further complicating factor is that it is my understanding that the relevantly applicable definition of “events” for the purposes of the subject application includes “concerts”.

The most critical point is that the absence of any justifiable benchmark figure for the annual number of events that have taken place in the past makes the assessment of additional impacts associated with the use of the new Stadium impossible to determine.

Notwithstanding the above, in Section 4.9 – “Stadium operation and use” - of the EIS for the current Stage 2 development application, specifically in Section 4.9.1, which is headed “Events Operation”, and under the sub-heading “Number of Events and Operational Hours” it is noted that (amongst other things) “No restriction on the number of events at the stadium is proposed”. That same section also asserts that there will be no increase in the number of concerts – i.e. assumed to be 6, even though the legal limit appears to be 4 (see above). In view of the fact that the number of events and concerts that are proposed is not explicitly stated there is no assessment of the impacts relating to additional events beyond the 52 (notwithstanding the absence of any justification for this benchmark - see also above) as explicitly required by the terms of the original development consent. Moreover, it is a particular matter of concern that there is to be no limit at all on the total number of “events”.

Accordingly, there would appear to be a clear disjunction between the specific requirements of the original development consent and the contents of the documentation for the related Stage 2 application. Had the appropriate documentation been provided then it would have been possible for the consent authority to give proper consideration to this matter and to impose appropriately

worded conditions on any development consent that it granted, being conditions that, amongst other things, set specific and enforceable limits on the number of events and concerts to be held in any one year in the new Stadium, and which are clearly foreshadowed by the terms of the Development Consent for the Concept Development Application to which the subject application relates. Only in this way could the impact on amenity of the surrounding areas be properly considered and assessed.

### ***Signage***

Any signage on the external faces of the new Stadium must be restricted to signs that identify the Stadium. There should be no signage visible from outside the interior of the new Stadium that involves general advertising. This is to protect the visual amenity of the surrounding areas of public land.

### ***Media Screen***

There should be no external media screens on the Stadium on which events in the Stadium, or elsewhere, are shown. This is also to protect the amenity of the surrounding areas of public land, in particular, the area of Moore Park in the vicinity of Kippax Lake.

### ***Summary***

On the basis of the above considerations I object to the current development application on the basis that it does not comply with certain specific requirements of the terms of the original Development Consent for the Concept Development Application in that it does not provide a clear assessment of the impacts that the use of the new Stadium will have on the amenity of the surrounding residential areas and areas of public parkland. Moreover, it does not provide any assessment of the additional impact of the use of the new Stadium, as compared with the impacts associated with the use of the recently demolished Stadium.

Accordingly, additional information must be requested by the consent authority and provided by the applicant in order to adequately address these concerns so the any environmental impacts associated with the development application under consideration can be properly assessed, as required by the relevantly applicable provisions of the Environmental Planning and Assessment Act 1979. If this does not happen, then the legality of any approval granted by the consent authority in relation to the subject Stage 2 application based on the material as submitted by the applicant must be open to question.

At such time as these matters are properly addressed and in the event that the consent authority does grant development consent to the subject application then it will also be necessary to impose conditions which prohibit both general advertising signage that is visible from outside the Stadium as well as external media screens.