



Sydney Football Stadium proposed concert cap changes

Submission from Live Performance Australia

SUBMISSION SUMMARY

Submitter: Live Performance Australia (LPA)

Address: Level 1, 15-17 Queen Street, Melbourne, VIC, 3000

Application numbers: SSD-9249-Mod-7 and SSD-9835-Mod-8

Position: Support in principle

Reportable political donations 2021-2023: Provided in [Attachment A](#) via the major projects portal

LPA accepts the Department's [disclaimer and declaration](#).

1. INTRODUCTION

LPA is strongly supportive of the following changes in relation to the Sydney Football Stadium (SFS):

- A. increasing the number of concerts presented per year
- B. increasing rehearsal finish times and sound tests from 7pm to 10pm
- C. increasing concert length from 5 hours to 10 hours to allow for 'Live Aid' style events
- D. including an exemption to the concert curfew (11pm) to allow the SFS to host the annual official Mardis Gras after-party. These changes are preferable to the current situation.

However, LPA does not agree that the development consent should include a cap on the number of concerts that can be held each year. Decisions relating to the frequency and length of events should be made on a case-by-case basis. This is common elsewhere in Australia and in relation to sports at the SFS.

This flexible approach will also reduce the need for future, resource-intensive consultation processes to make further changes to the cap. It will not prevent the venue from restricting the number of events held based on resident feedback and considerations of noise and transport.

2. INDUSTRY CONTEXT

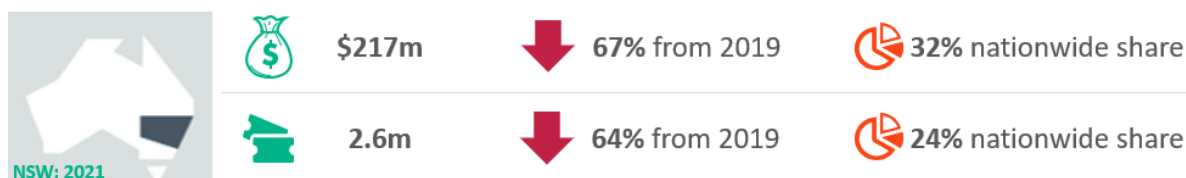
NSW is a major contributor to Australia’s live arts and entertainment industry

In 2019 the live performance industry in NSW recorded a total revenue of \$667m and an attendance of 7.2m. This included:

- total revenue of \$271.4m and attendance of 2.6m for contemporary music
- total revenue of \$74.7m and attendance of almost 600,000 for contemporary music festivals.

In 2021, NSW recorded the highest share of revenue (\$217m) and attendance (2.6m) amongst all Australian states and territories.¹ Contemporary music in NSW alone attracted \$30.3m and 549,497 attendees. Contemporary music festivals generated \$7,383,207 and 66,638 attendees.

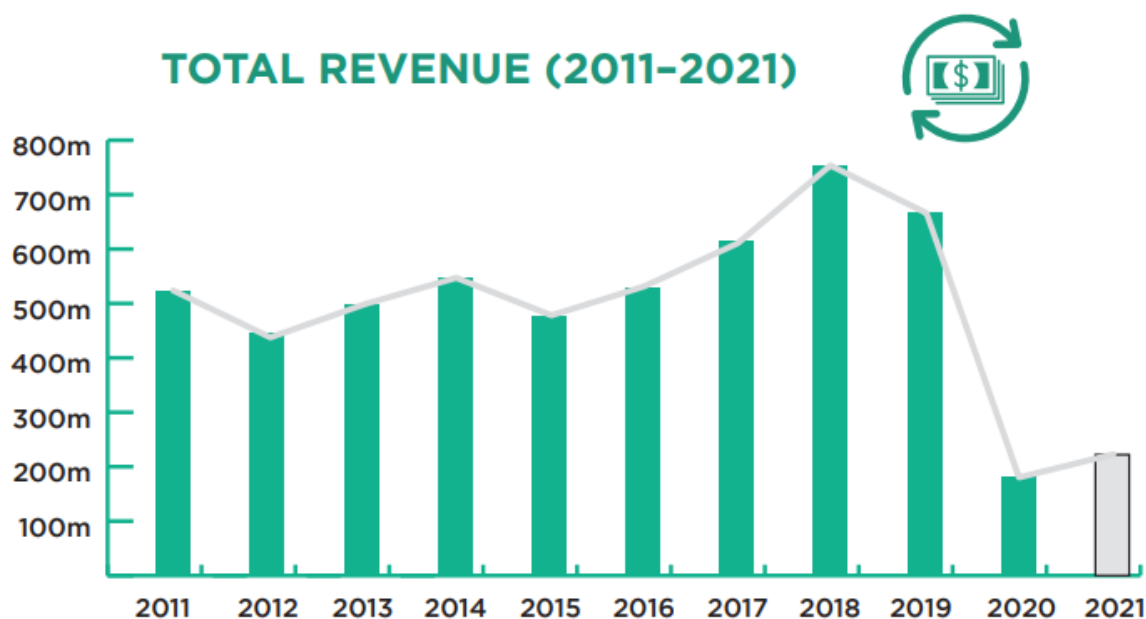
However, these results are noticeably lower than pre-pandemic.



Support is needed to rebuild following the pandemic

As demonstrated in the graph below, NSW saw an annual growth in live performance revenue from 2015 (\$478m) to 2019 (\$667m). This trend was disrupted by the impacts of COVID-19.

The SFS concert cap change will have direct and indirect economic benefits and allow for increased diversity in events held. Combined with the proposed Arts, Culture and Creative Industry Policy for NSW, this can help the sector to return to its pre-COVID growth trajectory.



¹ EY (2023), *Live Performance Industry in Australia, 2021 Ticket Attendance and Revenue Report*, Report of Live Performance Australia; [Full Report](#); [NSW LPA Infographic \(liveperformance.com.au\)](#)

3. LPA SUPPORTS THE PROPOSED CHANGES

LPA supports Modification 7 to the Concept Proposal (changes to the concert cap) and Modification 8 to Stage 2 Approval (changes to the concert cap and concert restrictions). Reasons for this support are summarised below.

As outlined in *Section 1: Introduction*, LPA does not agree that a concert cap is appropriate. If a cap is included in the development consent, LPA does agree that this should be increased from 6 to 20 per year, with two 10-hour concerts permitted.

A. INCREASE CONCERT CAP FROM 6 TO 20 PER YEAR

Increased access to infrastructure

- LPA Members in NSW have raised access to rehearsal and venue spaces as a challenge. This includes spaces of all sizes, including large-scale venues such as the SFS. It is more financially viable to increase access to existing venues than to establish new ones.
- Increasing the number of concerts will also allow for more diversity in events and audiences.
- As noted in the Consultation Outcomes Report, this aligns with the approach taken in other sectors and jurisdictions. There is no cap on the number of annual sporting events at the SFS.²

Economic benefits

- Increasing the cap can attract more global acts and tourists to Sydney. It can also increase job opportunities and revenue for nearby businesses. This will support post-pandemic revitalisation by encouraging more audience participation and later opening hours for surrounding businesses.
- As outlined in *Section 2: Industry Context*, this could help the live performance sector in NSW to rebuild and reach pre-covid revenue and attendance trajectories.
- Increasing opportunities for concerts to be held in Sydney could also help to bring Sydney in line with Victoria and Queensland. In 2021, contemporary music events generated approximately \$38m for Victoria (with 658,542 attendees) and \$37m for Queensland (731,773 attendees). NSW recorded a total revenue of \$30m and attendance of 549,497.³

Maintained attendee and noise limits

- LPA supports increasing the concert cap while maintaining the current maximums for attendees and noise limits per event. It is expected that, while the number of concerts may increase, the impact on nearby residents per event will not substantially increase.

B. INCREASE CONCERT LENGTH FROM 5 TO 10 HOURS TWICE A YEAR

Increased diversity of events

- Increasing the length of concerts to 10 hours twice per year will allow more acts per day, supporting increased diversity of events and broader audience reach. Long events for charitable causes will also be supported. For example, events similar to Sound Relief (a concert held at the

² Ethos Urban (2023), *Consultations Outcomes Report: Sydney Football Stadium Concert Modification*

³ EY (2023), *Live Performance Industry in Australia, 2021 Ticket Attendance and Revenue Report*, Report of Live Performance Australia; [Full Report](#); [NSW LPA Infographic \(liveperformance.com.au\)](#)

Sydney and Melbourne cricket grounds to raise funds in response to the 2009 Victorian Bushfires).⁴

- This can also help to increase the competitiveness of NSW as a host for festivals. In 2021, Queensland generated a total revenue of \$17m for contemporary music festivals (33.8% national market share) and Victoria reported a total revenue of \$12m (23.8% national market share). Comparatively, NSW generated \$7m with a national market share of 14.4%.⁵

A more flexible approach is preferred

- LPA generally disagrees with the use of numerical limits on 10 hours events. Decisions on the number of events should be made on a case-by-case basis.
- Alternatively, the limit could be reviewed annually to assess whether it could be increased.
- Increasing the permitted duration of all events to 6 hours would also allow greater flexibility in terms of the types of concert presentations.

C. ALTER REHEARSAL AND SOUND TEST FINISH TIME FROM 7PM TO 10PM

Consideration of performers/crew and audiences

- Amending the rehearsal and sound test finish time from 7pm to 10pm will reduce time constraints for those involved in preparing the event and help to reduce fatigue. This is a significant challenge for workers that has been exacerbated by critical staff shortages post-pandemic.
- Consideration for preparation-needs will also contribute to ensuring the best possible experience for audiences.

Manageable impacts

- Physical improvements to the SFS, improved infrastructure in the surrounding area and comprehensive operational and management plans will all work to minimise noise levels.⁶ For example, the new stadium's design has a solid façade that reduces noise emissions in comparison to the previous stadium's large open sections. The Permanent Noise Monitoring System also works to monitor and minimise excessive noise emissions.⁷

D. CURFEW EXEMPTION FOR MARDI GRAS AFTER-PARTY

Increased audience access

- As noted in the Social Impact Assessment,⁸ the Mardi Gras after-party typically attracts around 10,000 people. The SFS has a seated capacity of 45,000 and concert capacity of 55,000, while the current venue (Hordern Pavilion) has a capacity of 5,500 people. Allowing increased access to this event will support equity and deliver economic benefits.
- The proposed wording for this amendment specifies that the exemption is not transferable to any other event and must occur only one time per year. LPA recommends that other events should be

⁴ [MCG rocks to Sound Relief](#)

⁵ EY (2023), *Live Performance Industry in Australia, 2021 Ticket Attendance and Revenue Report*, Report of Live Performance Australia; [Full Report](#); [NSW LPA Infographic \(liveperformance.com.au\)](#)

⁶ ARUP (2023), *SFS Concert Event Limit Review: Acoustic Considerations*

⁷ Ethos Urban (2023), *Consultations Outcomes Report: Sydney Football Stadium Concert Modification*

⁸ Ethos Urban (2023), *Social Impact Assessment: Sydney Football Stadium Section 4.55 Modification*

permitted to apply for exemptions on an ad-hoc basis. This process could include clear timeframes and notification requirements to ensure residents have adequate notice of such events.⁹

4. MITIGATION OF IMPACTS

LPA acknowledges the mitigation measures addressed throughout the impact reports and supports further investigation of the following for both concerts and sporting events:

- designated pick-up/drop-off zones
- increased coordination of event dates in the area
- review local traffic management plans
- increased frequency of public transport services during events
- continued use of integrated ticketing arrangements for free public transport to events¹⁰
- clear communication to nearby residents.

ABOUT LIVE PERFORMANCE AUSTRALIA

LPA is the peak body for Australia's live arts and entertainment industry. Established over 100 years ago in 1917 and registered as an employers' organisation under the *Fair Work (Registered Organisations) Act 2009*, LPA has nearly 400 Members nationally. We represent commercial and independent producers, music promoters, performing arts companies, venues (performing arts centres, commercial theatres, stadiums and arenas), arts festivals, music festivals and service providers (such as ticketing companies and technical suppliers). Our membership spans from small-medium and not-for-profit organisations to large commercial entities.

⁹ Ethos Urban (2023), *Modification Report: Sydney Football Stadium (Appendix B)*

¹⁰ [Decision - Sydney Football Stadium Integrated Ticketing | City of Sydney \(nsw.gov.au\)](https://www.cityofsydney.nsw.gov.au/decision-sydney-football-stadium-integrated-ticketing)