Additional notes provided in response to Draft IAR. April 9 2025

Background comments:

Regarding the sequence and spatial thinking of the 'Urban Form' and 'Landscape and Visual Effects' reports.

Considering key relevant materials identified in the DIAR under 3.1 Urban Form of Sullivans Cove and Hobart City and 3.2 Landscape and Visual effects sections. These documents include: the Sullivans Cove Planning Review (1991), the Hobart Waterfront Urban Design Framework (2004), Hobart 2010, Public Spaces and Public Life, (2010) The Building Height Standards Review (2018), and the Central Hobart Plan (2023).

Although the documents are chronological, they do not treat the landform of Sullivans Cove in the same way. This is important in seeking consistency of approach when reviewing the spatial context of the proposed stadium, especially having regard to current planning policy and expectations. Put simply it concerns the difference between considering the setting as a 'backcloth' (to the urban landscape of Sullivans Cove), and considering the 'landform as fundamental to urban structure'.

The 1991 Planning Review identified the setting as important, (Sullivans Cove was contained within the 'great amphitheatre' 1991, p.26) but it did not translate this into an appreciation of the *landform* that had 'shaped' the built form of the cove. Rather it remained as landscape *backcloth* where the water was the 'stage' and the mountain 'the gods'. (1991 p.17). Accordingly the principal spatial features were the 'Wall to the Cove' and the 'Cove Floor', being the visually dominant components of *built* structure.

This approach continued into the Hobart Waterfront Urban Design Framework of 2004. Here the grid of streets are identified as 'axes' in contrast to the Cove Floor, itself located beyond the defining edge of the Cove Wall. Similarly the 2010 Study by Jan Gehl, implored the city to make the most of its remarkable setting, (2010 p.16, 76) but also did not differentiate the landform as fundamental generator / edge to the Cove Floor.

This is important because the former Railyards site (being part of the 'reclaimed floor' of the cove) was not yet being considered part of the (potentially) extended public space of the Cove Floor. Although earlier studies had differentiated the reclaimed edge of the Cove from the Cove Wall itself, (1987 Sullivans Cove Urban Detail Study, p. 20, 24), and this also informed studies of the City Centre, (1991 Townscape topic report, CASP, HCC, p.2.4, 3.2) it was not until the Height Standards- Performance Criteria Review (2016) and the ensuing scheme Amendment (PSA 17-3, 2018) that landform terminology and specific figures were incorporated into the scheme. These then informed the Building Height Standards Review (2018).

These now clearly identify the *reclaimed* edge of the Cove Floor (fig 22.7) (also identifying the 'basin'), as well as the topographic condition of the Central Hobart terrain forming the Urban Amphitheatre. (figs. 22.8, 22.9) These, and the analysis embedded in the 2018 study, has helped reinforce and inform considerations of Central Hobart building heights being based on the (landform) location and their stepped character, back from the Cove Floor and in from the Domain headland. (CHIPS 22.1.3, 2018, CHP 2023)

In short, the context for density and building height now acknowledges the terrain of Central Hobart and the Amphitheatre to the Cove, as inherent and identified components of urban structure, not simply as 'backcloth'. Hopefully this clarification helps reduce some of the anomalies that persist when considering the earlier listed documents, as well as Appendix GG. (SDP)

There are some specific points / items within the Draft IAR to comment on :

3.1 Building alignment

(o) ' Evans Street is identified in the Planning Review as a street that should have buildings with active edges forming a street edge'. ... 'the stadium, which is free standing, would not align with the street... with active frontages... does not meet the intended building form in the area'.

Further to the preceding contextual comments, it is important to remember that when the Planning Review was written the 'Railyards' at Macquarie Point were not addressed as part of the Cove Floor. Moreover the landform considerations that now differentiates the 'reclaimed' from the 'given' ground were not incorporated. Accordingly the Cove Wall (that incorporated the frontage of Hunter Street) did so based on its built form, not due to the fact that it was built over Hunter Island and the sand spit (as 'given' ground). In short the Planning Review (1991) was 'built form' derived, not 'landform' derived.

As a result the buildings along Evans Street were not considered part of the Wall, even though logically they were built above the same 'ground' conditions as the Hunter Street frontage. This was an anomaly identified over a number of years and incorporated into subsequent analysis, including one of the documents included in the TPC Guidelines reference list. (Woolley 2015, 2017)

When the further considerations of the Cove Floor were recognised as incorporating all that area that was reclaimed, and that buildings on the Cove Floor were to be free-standing, ('in the round') then the previous inconsistent notion (that the former Railyards / Macquarie Point edge of Evans Street should be a street frontage) was brought into question. Accordingly, the outcome by the Panel (p) (p.47) that Evans Street should *'still meet the general intent of the planning principles'* is somewhat open to review.

The important consideration is that typologically this side of Evans Street should not be treated the same as the other side. The stadium side can accommodate buildings 'in the round' rather than 'street' facing, ideally with active edges.

4.2 Regatta Grounds / Lower Domain Precinct (+ **10.3** (h)) p.60 <u>Context '</u>...assessment of the housing development is not within the scope of the Project '

This component of the 'Project' none the less needs to be critically considered. It is potentially an extremely significant impact in terms of an incompatible use, as well as an inappropriate building height and presence. This is particularly the case considering its impact on the landform of the headland and the cultural values of the Cenotaph, and the expectations of public access along the foreshore beyond the working port.

Although beyond the scope of the Panel's review, it is potentially a significant non -conforming development / project. It must not be simply excluded, or left beyond critical review and consideration.

4.3.2 (c) Goods Shed p. 64 <u>Context</u> ... relocation

The proposed relocation would not seem to take account of the significance of the 'original' shore to planning outcomes in the Cove and Macquarie Point.

The sheds' relocation to the northern edge of the stadium reduces the public space between the toe of the headland and the reclaimed 'floor'. Accordingly, it potentially compromises the 'free standing' stadium and its separation from the landform of the headland. With so much effort expended over a number of years to reinforce this differentiation, it is necessary to ensure this is not undermined by such a move.

The other crucial feature of this 'relocation ' is not to inadvertently diminish capacity to interpret the 'line' / location of the 'original' shore. While subject to further careful analysis, it would seem that the proposed building would be located above / across the 'original' shore, potentially diminishing archaeological interpretation and aggravating cultural sensitivities.

Sub-surface impacts are also likely in those locations where further excavation will be necessary, beyond the perimeter of the stadium itself. These include the anticipated multi-level carpark next to the stadium to the NE, and the cricket practice nets to the North. It is recognised that the practice nets in particular will reduce public gathering space and movement including potentially on the cycleway / network.

Leigh Woolley Architect 9 April 2025

Additional documents mentioned:

Sullivans Cove Urban Detail and Bicentennial Walking Trail Study Sullivans Cove Development Authority 1987 L. Woolley et al

Townscape Topic Report Central Area Study Project HCC 1991 L. Woolley

Appendix 3 (2015) In: Macquarie Point Masterplan : Re-set Urban Design Notes 2017 L. Woolley

Height Standards – Performance Criteria Review HCC 2016 L. Woolley



Prepared for the Hobart City Council

Leigh Woolley Architect + Urban Design Consultant leigh@leighwoolley.com.au

December 31 2024

Review : Section 4 _Landscape and Urban Form_Mac Point Multi Purpose Stadium



Leigh Woolley Architect + Urban Design Consultant 224 Murray Street Hobart TAS 7000 leigh@leighwoolley.com.au

Final Draft Report 31 Dec. 2024

Photography : Leigh Woolley

In mid October 2024 Leigh Woolley Architect was engaged by the Hobart City Council to undertake a discrete review of reports that have been submitted in response to Section 4: Landscape and Urban Form for a proposed Multi Purpose Stadium at Macquarie Point, Hobart.

The comments were to be considered against Guidelines developed by the Tasmanian Planning Commission (TPC) for the Project of State Significance process. The intention is that these comments assist Council in setting out its views regarding the POSS, as Council are not the planning authority for the project. Governed by the State Policies and Projects Act 1993 (the 'Act'), the parameters of the TPC's assessment have been prepared as an Appendix matrix for each section of the Guidelines. The relevant sections are identified to the left hand side of the following pages.

For the relevant reports it was requested that judgements be made whether the reports have adequately responded to the requirements of the guidelines, and if specific consideration of the guidelines have been met.

Review: Section 4_Landscape and Urban Form Macquarie Point Multi Purpose Stadium

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References

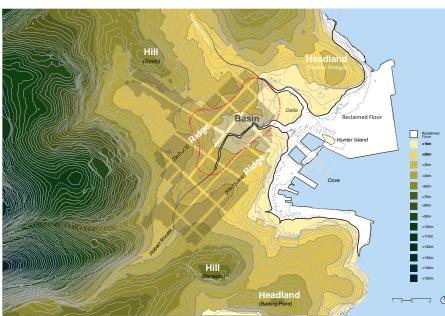
Review : Section 4 _Landscape and Urban Form_Mac Point Multi Purpose Stadium



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Review : Section 4 **Landscape and Urban Form** Macquarie Point Multi Purpose Stadium





Location as context

No site or project exists in isolation. Context is inherent. In response to the relevant Landscape and Urban Form reports (developed as part of the POSS planning process), the context is both the physical location, and how its evolution has been considered, acknowledging recent planning history.

Since its adoption, the Sullivans Cove Planning Scheme (1997) has been subject to change and alteration. In anticipation of a statewide planning scheme, the SCPS has been revised and now more seemlessly accords with the Hobart Interim Planning Scheme (HIPS 2015).

While integration may assume a dulling of specificity, it does not diminish the need to apply consistent judgement across the spatial scales of the planning process, especially between precincts.

It is with this in mind that spatial information now forming part of the HIPS 2015, (Fig. 22.7) identifying the landform structure and settlement context of Central Hobart and Sullivans Cove is considered at the outset. It can be interpreted in a number of ways including as a topography, a history and a foundation from which to consider development of the city centre, including Macquarie Point. It confirms the site context as part of a 'reclaimed floor' between headlands and adjacent the outflow of two rivulets, with a progressive layering of rising ground, especially to the west.

Identified by its location within a 'basin' informed by the principal rivulet, the street grid of Central Hobart is differentiated from the reclaimed 'cove floor'. The edge of the original shore is identified between the given ground and the reclaimed floor, readily providing a datum that is both topographic and historic.

Being formed by human endeavour, the Cove Floor is also differentiated by being a planar surface, necessary for multi-directional movement in support of port operations. Today this supports the reclaimed edge as a civic domain, effectively (in part) 'floating' several meters or so above the more extensive horizontal datum of the harbour water-plane.

Fig. 22.7 (HIPS) Central Hobart Landform Structure (also identifying the Reclaimed Floor)

TPC GUIDELINES

4.0 | Landscape and Urban Form

4.1 | Landscape and Visual Values

Clause 4.1.1

The reports are to discuss, identify and assess the likely significance of, and the effects of, change resulting from the Stadium on the landscape, as a public resource, and on people's views, enjoyment and visual amenity.

The landscape is to be assessed in its broadest sense. The area to be included in the assessment is to be the full extent of land and water where there may be an effect. The definition of landscape is to include natural landforms, waters and ecosystems, human settlement and people's association with place.

The landscape assessment is to describe the importance and values attached to elements of the landscape by people and communities.

Clause 4.1.2

The reports are to assess the effect the proposed project has on:

- the landscape and townscape values and characteristics of the project site and broader area,
- spatial and physical use and enjoyment,
- specific views in to and out of the site and the general visual amenity experienced by people and the likely significance of visual effects.

Clause 4.1.3

In preparing the reports, specific consideration is to be given to:

- how the historic character of the landscape is incorporated into and shapes the character of the locality. The historic landscape character will be derived from understanding how the long sequence of events and actions are visible in today's landscape and the broad patterns and character that this sequence reveals,
- supplementing the assessment of historic and landscape character with information on:
- the historic cultural heritage significance of registered and listed heritage places and precincts,
- the cultural significance of known Aboriginal heritage (note: advice from Aboriginal Heritage Tasmania will be obtained on how sensitive information is to be presented in reports).
- · the spatial characteristics of the broader area,
- the existing urban morphology of the broader area, how previously adopted plans and strategies related to future urban form contribute to the landscape character of the area and the effect that out of scale buildings have on the historic and landscape character of the area,
- the area within which the proposed project is visible, the number and range of people and groups who may experience views and viewpoints and where they will be affected,
- the overall significance of visual effects from an understanding of the sensitivity of viewers, the values of different views and the scale, degree of contrast and magnitude of visual effects,
- people's visual and spatial experience of the proposed project incorporating:
- where people experience the proposed project while moving in the broader area, the sequential visual experience is to be assessed,
- where the proposed project is to be lit at night, the effects of lighting are to be assessed,

Landscape and Visual Values

'Landscape is to be assessed in its broadest sense' (Clause 4.1.1)

The VIA Response (Appendix J) has been to consider *'key viewpoints around the city to and from the Site and the Cenotaph'*. However these generally do not extend to an appreciation of the location at 'the sub-regional level' (*Clause 4.1.3 dot point 8*) and to encompass 'the spatial and location characteristics of the surrounding landscapes, and their roles and values' (Clause 4.1.3, dot point 9).

Refer to Suggested Additional Viewpoints (pages xx)

Accordingly, responses within both the Urban Design Framework and the Visual Impact Assessment are constrained to 'the site', rather than considering the *site context*. The TPC Guidelines however anticipate an appreciation across scales, 'the definition of landscape is to include natural landforms, waters and ecosystems, human settlement and people's association with place'. (4.1.1), and 'how the historic character of the landscape is incorporated into and shapes the character of the locality' (4.1.3 dot point 1), and the effect the proposed project has on 'landscape and townscape values and characteristics of the project site and the broader area' (4.1.2 dot point 1)

The Site Context is not just the space of Sullivans Cove and the Cenotaph, but the setting of the Domain headland, the place of the cove within the river edge landforms, (including headlands in contrast with the harbour waterplane), and the layered ground rising to the containing 'landform horizons', notably kunanyi and the Wellington Range.

As a result, references to the 'Urban Amphitheatre' and the 'Amphitheatre to the Cove' (definitions of both are within the existing planning scheme) are ill understood, and can be considered inadequate.

Accordingly it could be argued the Visual Impact Assessment does not establish the baseline landscape and visual conditions as anticipated in the Guidelines. (4.1.1, 4.1.2, 4.1.3 esp. dot points 6, 7, 8) The baseline landscape condition is in the broadest sense, the relationship between 'containment and release' ('containment' by high and rising ground in contrast to 'release' across the harbour waterplane), and how this has been incorporated into and informed numerous documents since the 1997 SCPS.

As the source reference document (2013)* states :

'For the landscape baseline the aim is to provide an understanding of the landscape in the area that may be affected – its constituent elements, its character and the way it varies spatially, its geographic context, its history, its conditions, **the way the landscape is experienced** and the value attached to it'. (p.32)

Crucial to this expectation is determining 'the area that may be affected'. Given the scale of the proposed structure, and the expectation in the Guidelines that 'specific consideration is to be given to: the spatial and location characteristics of the surrounding landscapes' (4.1.3 dot point 9), the affected area is not merely the 'subject site', but the visual catchment of the development.

In terms of whether the Visual Impact Assessment has critically analysed the landscape against the methodology identified in the 2013 document* the following are noted :

- There is no map or plan of the broader urban setting that includes the components of the landscape included / discussed in the report (eg. 'Urban Amphitheatre', 'Amphitheatre to the Cove')
- Nor is there an indication in section, or through appropriate photography, to acknowledge that the scale of these inherent spatial characteristics have been acknowledged in the assessment.

This chapter provides a summary of the response to this guideline. A technical response to

This chapter provides a summary

of the response to this guideline.

landscape assessment, and key

from the Site and Cenotaph is

provided in Appendix J - Visual

Impact Assessment Report.

Viewpoints around the city to and

A technical response to the

characteristics is available at Appendix I – Urban Design Framework.

RESPONSE

This chapter provides a summary of the response to this guideline.

A full response is provided in: Appendix I – Urban Design Framework

Appendix J – Visual Impact Assessment Report.

^{*} Guidelines for Landscape and Visual Impact Assessment (Third Edition) 2013. The Landscape Institute and the Institute for Environmental Management and Assessment. (UK)

 the spatial and location characteristics of the Cenotaph headland within the surrounding townscape and landscape at a local and subregional level. The roles, values and landscape significance of the Cenotaph headland is to be assessed with respect to views and vistas to and from the Cenotaph.

- as identified by users and managers of the Cenotaph,
- as outlined in section 32.3 and figure 32.2 of the Sullivans Cove Planning Scheme 1997,
- as outlined in Planning Scheme Amendments to Macquarie Point Site Development Plan Planning Report, AllUrban Planning, Dec 2018,
- as outlined in Macquarie Point Master Plan: Reset urban design notes, Leigh Woolley, 2019,
- the spatial and location characteristics of the surrounding landscapes, and their roles and values.

TPC GUIDELINES

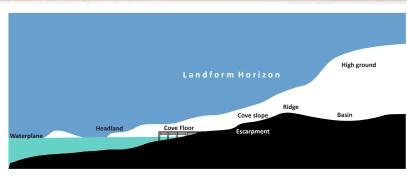
Clause 4.1.4

The reports are to provide plans, including sections and elevations, maps and graphics that show, illustrate and describe:

- the landscape character of the area and the significance of effects to landscape values,
- the historic character of the area and how layers of history are revealed through visual and spatial indicators,
- the historic, existing and planned urban morphology of the area, and how this character is represented in the landscape,
- the areas within which the proposed project may be viewed and the range and number of people that may be affected,

 key sequential and static viewpoints and the overall significance of visual effects. The methodology used for visualisations is to be described and is to be informed by the New Zealand Institute of Landscape Architects Best Practice Guide 10.2, Visual Simulations, 2010, or an equivalent professionally developed and adopted set of guidelines.

The reports are to be informed and guided by the processes and principles outlined in Guidelines for Landscape and Visual Assessment, third edition, 2013.



RESPONSE

This chapter provides a summary

of the response to this guideline.

A full response is provided in:

Appendix J - Visual Impact

Appendix I - Urban Design

an outline of the landscape

The two appendices also provide

character and urban morphology

of the area. This is supported

by the detailed urban design analysis, plans and diagrams

Appendix B - Stadium Design

Appendix A - Architectural

Assessment Report

Framework.

provided in:

Description

Drawings.

Appendix GG - Site

Development Plan



While there is a description of the local components: 'Queens Domain', 'Cove', 'City centre', the analysis does not extend to consider how these integrate with one another to gesture to how the landscape is experienced, notably in the context of the Urban Amphitheatre.

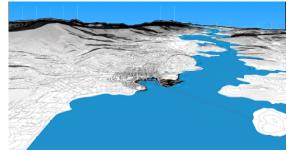
It is within this context that the terminologies derive their meaning. NB. The Urban Amphitheatre means 'the setting of Central Hobart including the layered rise of landforms rising from the water plane datum to the landform horizons'.

Diagrams are therefore included from the current planning scheme (HIPS 2015 NB. fig. 22.9) that reinforce the location of Urban Amphitheatre, in 'plan' and via axonometric 'view'. (right opposite) These, and the context to which they apply, are however not acknowledged in either the Urban Design Framework (UDF) nor the Visual Impact Assessment (VIA). It would seem that the intent of Clause 4.1.3 (esp. dot points 5, 6, 7, 8 and 9) are therefore inadequately addressed.

A 'diagrammatic section' is included in the current planning scheme (Fig. 22.8) to identify the spatial terminologies incorporated within the 'Urban Amphitheatre' and the 'Amphitheatre to the Cove'. (The diagram is deliberately 'scale-less' and was only intended to be used in concert with the other figures, 22.7, 22.9) However it has been inappropriately copied as a literal 'section', (UDF p.100) to justify the scale of the proposed stadium.

There is no direct reference in either document to the spatial experience of the 'Amphitheatre to the Cove' meaning 'the **layering** of rising ground from the waterplane to the landform horizon, climbing away from the earlier rivulet outfalls as the low point into Sullivans Cove, incorporating adjacent hills and ridges, especially to the west and north west, and also flanked by distant headlands.'

The Urban Design Framework acknowledges that the Urban Amphitheatre provides 'a sense of scale and containment and influences the orientation of the City'



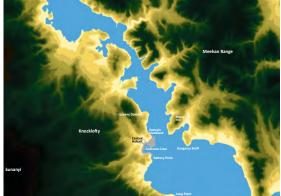
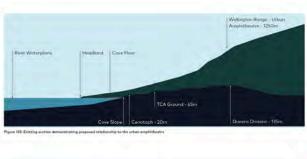
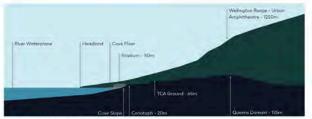


Fig. 22.9 (detail) HIPS 2015 'The Urban Amphitheatre'

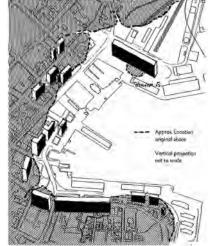
(p.67) but it does not then translate that to the sense of orientation within the Amphitheatre, is landform based. Rather it suggests 'the proposal is expected to have a low impact on the amphitheatre' and that, 'the dome of the Stadium is designed to reflect the wider landscape by alluding to the layered undulations of the lower foothills, thereby reducing its overall impact on the setting'.

While the shape of the proposed building (with domed roof) may assume 'familiarity' in a sculptural or even geometric sense, this does not mean as a building it is, or will become, familiar in a landscape sense.



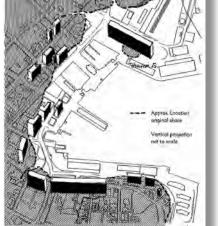


'Scale -less' diagrams copied from the Planning Scheme to inappropriately 'justify' the scale / bulk of the proposed Stadium. (UDF p.100)



The 'original shore' has been identified in planning documents prior to the 1991 SCPR. This diagram confirms the relationship between buildings forming the 'Wall to the Cove' (located on solid ground) and the reclaimed edge beyond the 'original shore'.

Sullivans Cove Urban Detail and Bi-Centennial Walking Trail Study. Woolley, et al. 1987



Differentiation between landform and built form identifies Hobart

It can be argued in response to the forementioned, that it is the differentiation between the 'given' landform and 'subsequent' built form, that identifies Hobart.

The UDF (Appendix I) compounds the confusion by suggesting the impact of the domed roof is mitigated 'as the built form forms an extension of the perceived headland outwards towards the Estuary'. (p.67)

The distinction between landform and built form is particularly pertinent within Sullivans Cove. It is loosely recognised through the spatial construct of the 'Wall to the Cove'. This spatial characteristic is identified in reference to a built edge of buildings built close to the 'original shore' prior to reclamation. It also assists in identification of the built margin of the Cove Floor itself.

As the more essential feature, the 'Floor to the Cove' is itself differentiated from the 'given' landform of the headlands, escarpments and rising ground. This foundational distinction further underpins the role of the natural landforms to the identity of the 'cove'.

It also fundamentally acknowledges the importance of the 'original shoreline' above all other spatial characteristics. Acknowledging and identifying the 'original shore' not only allows a datum from which to gauge colonisation and the process of settlement, but by virtue of its planar character, a differentiated surface from that of the adjacent undulating 'given' ground.

As stated in one of the reference documents : (4.1.3 dot point 8)

"Being 'reclaimed' from the waters of the harbour, the Cove Floor is differentiated from the 'given' or 'natural' landform of the city. Accordingly it can be regarded as a 'created' topography. In the context of the 'natural amphi-theatre created by the water and mountainous backdrop' (SCPS 6.2 Strategic Framework Designing the Future Urban Form) the Cove Floor is an 'in-between' space, reflecting the unique history of its formation as a sequence of utilitarian man-made spaces. These

now comprise a continuous broad expanse (often experienced as a planar platform) between natural ground and the deep-water of the harbour. In response to these landform and built 'form' conditions, and in the context of the extended urban setting, 'the bulk and height of buildings must respect ... the amphitheatre sloping down to the Cove and the Macquarie and Regatta Point Ridges'. (SCPS 23.2 Urban Form Obiectives)".

Mac Point Master plan : Reset - Urban design notes, Leigh Woolley 2019

Identifying the original shoreline has therefore been fundamental to considerations of the urban morphology of Sullivans Cove in recent decades, including its implications on built form.

The 'Urban Design Notes' referred to above were compiled to provide context to the anticipated MPDC envelopes as part of the Macquarie Point Masterplan Re:set (circa 2018). Accordingly they reinforced spatial thinking and professional analysis (including views and sightlines) carried out since adoption of the SCPS (1997).

Some of these documents need to be identified / noted, as the current SDP (Appendix GG) appears to be unaware of their existence. (ie. there is no bibliography. timeline or list of references as part of the document).

- Visual and Urban Design Assessment (Oceanport) POSS assessment (1997) Walker, Shelton, Woolley
- Site Development + Conservation Plans (PW 1 + 2)(2000) Shelton, Woolley
- Hobart Railyards Urban Design Strategy (2008) SCWA
- Sullivans Cove Masterplan (2010) Office State Architect
 - Statement Cultural Significance Concrete Aprons / Cove Floor (2011) Woolley for SCWA
 - Macquarie Point Strategic framework and Draft Masterplan 'New territory from old ground' (2014) JWA
 - HIPS 2015 Height Standards Performance Criteria Review (2017) Woollev for HCC
 - Macquarie Point Site Development Plan (2017) MPDC
 - . Building Height Standards Review Project (2018) Woolley for HCC

TPC Guidelines Clause 4.1.3

Specific consideration be given to :

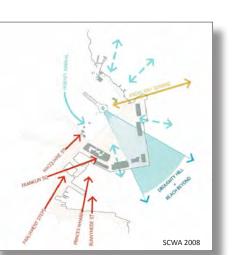
' The spatial and location characteristics of the Cenotaph headland within the surrounding townscape and landscape at a sub regional level... (Dot point 8)

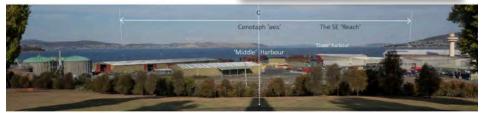
Reference documents considering the View from the Cenotaph down river to the mouth of the Derwent.

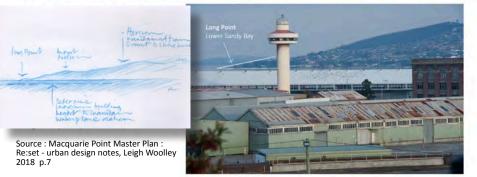
Right : Principle : Respect Key Views to and from the Cenotaph and from within Sullivans Cove.

Hobart Railyards Urban Design Strategy Sullivans Cove Waterfront Authority. 2008 p.14

Below : Considering the View Line from the Cenotaph down river to the mouth of the Derwent.







Reflecting the 'natural' topography

The VIA report (Appendix J) acknowledges the stadium will have a significant impact (effect significance varies from Moderate - High) with an acknowledged change to its visual surrounds. (*p*.77) The report then concludes that it considers the Stadium meets the intended outcomes of the SCPS, its Amendments and Guidelines for the POSS.

However the intended outcomes of the SCPS include that the bulk and height of buildings must reflect the natural topography of the Sullivans Cove Planning Area, the Amphitheatre sloping down to the Cove and the Macquarie Street and Regatta Point Ridges. (23.2 dot point 5)

As the VIA clearly shows, the bulk and height of the building does not reflect the 'natural' topography of the SC Planning Area, and as view line 7 confirms, (as would other suggested view-lines), nor does it reflect (or reinforce) the amphitheatre sloping down to the cove.

NB. To 'reflect' does not mean to replicate / copy or substitute a built form for a 'natural' (form) topography, moreover it alludes to a particular built scale and presence, where the natural features of the amphitheatre are clearly identified, without new buildings being individually prominent. (23.2, dot point 7). In short the result of the objective is to differentiate built form from landform so as to ensure the natural topography continues to be reflected.

It is also noted that there are no dusk or night time images provided capable of identifying the anticipated transparency of the dome and its lighting impacts.

View Line Impacts

The VIA (Appendix J) acknowledges that the Stadium would become a prominent feature within the locality. (p.68) It further suggests that the identified important views (*shown on Fig. 32.2*) will continue. Although several localised views will unlikely be affected, other important views will be impacted.

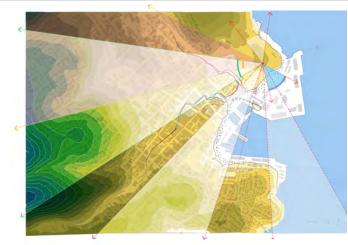
This includes View lines from the Cenotaph to the mouth of the Derwent River (*VIA viewline 5*) and the more general expectation that the Cenotaph headland offers the experience of the urban landscape, where important views will not unreasonably be impacted, including :

'From the Cenotaph to the horizon of the natural amphitheatre, including the Wellington Range descending to the Mount Nelson ridge, then to Porter Hill and down to the waterplane at Long Point, Lower Sandy Bay. ' (SCPS 32.3.8)

Given this, the statement that 'Views of the mouth of the River Derwent towards the south east are still visible from the Cenotaph.' (p.68) is incorrect. It is not merely a view across the harbour (to the Howrah Hills) but specifically views to the mouth of the Derwent that are anticipated. This includes the deep prospect to the southern sky over the South Arm Peninsula to the (unseen) but implied 'mouth of the Derwent', as this embraces Storm Bay beyond.

The view to Betsey Island on the horizon seen above the harbour waterplane, also confims this. (see also VIA View 3, Existing View) The experience of the landscape setting is confirmed by ensuring the 'landform horizon' of the 'natural amphitheatre' continues along the Mount Nelson ridge continuing down to the waterplane at Long Point. This is shown in the previously identified TPC reference document. (detail : left opposite)

While the VIA recognises that views to Long Point will be obscured by the Stadium, (p.68) it must be assumed the author does not adequately appreciate the location of the 'mouth of the Derwent'. In this instance it is actually behind Long Point, while Storm Bay is more readily appreciated by the form of Betsey Island on the horizon. Accordingly two landform items assist in appreciation of the 'mouth of the Derwent' from the Cenotaph: the waterplane connection of Long Point, Lower Sandy Bay, and the presence of Betsey Island (located within Storm Bay) on the horizon. Both of these features will be obscured by the proposed Stadium. (VIA View 3 Proposed stadium- following page)



The Cenotaph headland provides one of the city's principal viewing points. Diagram of amalgamated views from the 2018 study on Building heights.





View line 3 (VIA) Existing and proposed impact on views across the cove and down river.

Transitioning to and from the low point of the amphitheatre of the cove

The VIA recognises The Amphitheatre as being 'the broad conceptual and physical construct of the landform and built form around Hobart' (p.7), and the Cove Amphitheatre 'references the layering up from the waterplane to the Cove Floor and adjacent hills, and that it is 'bookended' by the two headlands of Macquarie Point and Queens Domain to the east and Battery Point to the west'. (p.8) It further contends that the 'sites contextual setting' is 'visually complex involving the interplay between built and natural elements' (p.8).

However it does not then consider the anticipated height and bulk of the proposed Stadium to this context, and then ask whether these landform features, as key spatial characteristics, can continue to be identified or appreciated.

The urban form expectations are identified in the SCPS (23.2 Objectives) where 'the bulk and height of buildings must reflect the natural topography of the Sullivans Cove Planning area, the amphitheatre sloping down to the Cove and the Macquarie Street and Regatta Point Ridges.'

These intentions are further pursued as Desired Future Character Statements within the current planning scheme, (*HIPS 2015*) (*Clause 22.1.3.1*) where the built scale (of Central Hobart) will '*transition* from its intense focus in the basin...including both its rising and diminishing grades, including *to the low point* of the Amphitheatre to the Cove'. (See Fig. 22.7, 22.8, 22.9). 'while providing a *reduction in scale* to the Queens Domain, the Domain and Battery Point headlands'. (see *figs. 22.7, 22.8*).

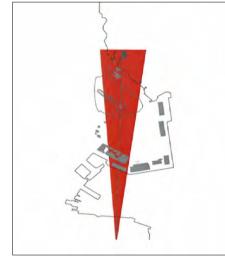
The transition between the intensity of the city centre and the lesser scale within the cove is clearly intended and anticipated, as is the expectation that the headlands remain obvious as landforms.

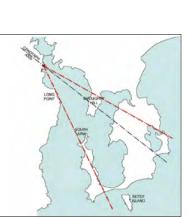
The layered rise from the waterplane, lifting to the cove floor and then through the scales of the amphitheatre are further anticipated as a 'stepping up, while stepping away' from the Cove. By contrast the VIA acknowledges that 'the Stadium extends above that of the built form in the surrounding visual context and it presents as a prominent element from most of the viewpoints outlined'. (*p.61, 9.1*)

Moreover the report suggests the Stadium 'is intended to be an iconic building in Hobart.. and a focal point within its local setting'. (p.61, 9.2)

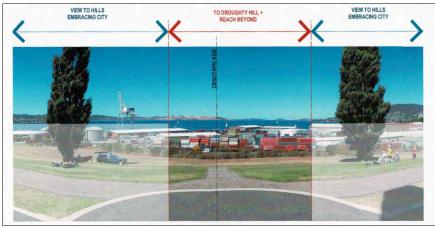
The SCPS Urban Form Objectives also insist that 'New buildings not be individually prominent with neighbouring buildings by being significantly higher or having a larger apparent size....' (23.2 dot point 7)

Notwithstanding architectural efforts to generate a contextual form in response to the brief, the presence of the Stadium above the Cenotaph headland is both individually prominent, and of a scale that obscures views across the Cove and down the river, especially to the 'mouth of the Derwent'.





Detailed view analysis including definition of 'The Reach' (right and below) together with a number of other views across the cove, (example above) formed part of the thorough analysis of the Hobart Railyards Urban Design Strategy, 2008.



Above : Key View analysis & heights- 1 Built Form Height Strategy. (p.22) Hobart Railyards, Urban Design Strategy, December 2008 (SCWA)

'Reviewing' rather than 're-setting' the planning context

Given the height, bulk and impact of the proposed Stadium, a review and reconsideration of planning expectations is necessary. This is particularly the case regarding anticipated building scale 'stepping back' from the waterfront. (*Refer Figure 8, SCPS p.110, Clauses 32.3 esp: 32.3.7, 32.3.8, p. 172*)

Rather than a 're-setting' of the planning context, as suggested by the Site Development Plan (2024) (Appendix GG), a review of amendments already made to the planning scheme is more appropriate as a point of departure.

In seeking to establish a case, the SDP (2024) returns to the SCPR (1991) for guidance while seemingly disregarding subsequent professional analysis, including amendments to the Planning Scheme. Accordingly the SDP would seem to be unaware (or in denial of) recent planning history. The rationale and approach in consequence is inadequate, if not confusing.

For example the role of the Cove Floor as the primary element differentiating both the original shoreline and the planar character of the reclaimed space has long been identified, and is not in dispute. Indeed documents predating the 1991 (SCPR) recognised the importance of the landform character in defining Sullivans Cove (eg. 1987 referred again 1997- see diag. p.8)

The 'wall to the cove' generates (in part) an edge of historic buildings and provides a convenient reference to the urban morphology of the central cove, but not to the more extensive reclamation of Macquarie Point. This deficiency has been recognised for some time.

Accordingly a number of documents and studies have acknowledged this, and have sought to amplify the concept of the Floor of the Cove as extending through to the reclaimed edge, including to beneath the 'escarpment'. (*Refer Fig. 22.7 HIPS*). This logic has also informed the previous Mac Point SDP. (2017) It is therefore disingenuous for the current SDP to suggest this spatial characteristic is now being 'revealed', as a 're-set'. However this is not the only concern arising from the current SDP. The document is laboured and unnecessarily verbose.

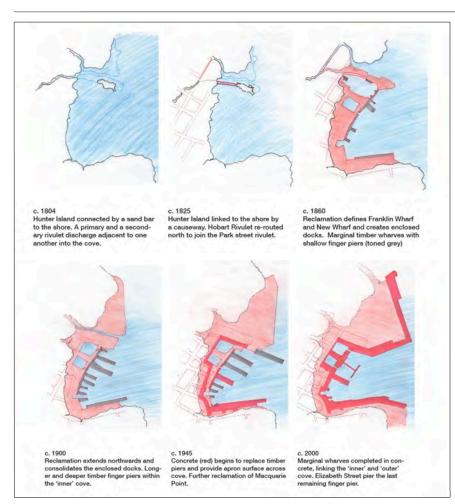
Rather than acknowledging the limitations of earlier planning documents (SCPR '91, and SCPS '97) and gesturing to changing circumstances, including acknowledging updates to the planning scheme, and recognising the considerable work done by various agencies since, seeks instead to re-badge this work under its own title : 'Resetting the planning context to deliver the cove principles' !

Given this, and the absence of a bibliography and references, (especially acknowledging work undertaken in the past 35 years) it is also lacking in both professional and scholarly rigour. As some diagrams in the report have been extracted from key studies that are not acknowledged, the validity of the 'plan' is further undermined.

The document seems instead to seek to justify a solution, rather than providing the spatial framework for a solution to be proven or tested against. This is particularly in evidence regarding views and viewlines.

As already noted, views in the initial Sullivans Cove Planning Scheme were essentially corridor/ street views, rather than landscape views that have come to identify urban design analysis in the city in more recent times. A number of studies have expanded upon the initial, more contained (central cove) views, to incorporate the role of the Domain headland (and through this the reclaimed space of Macquarie Point).

Work undertaken by the SCWA / 2008 in seeking to integrate the former Railyards as an extension of the Cove Floor, also carefully detailed views to and from the Cenotaph. These have informed subsequent studies, (including the 2014 Mac Point Masterplan) to also acknowledge the potential scale of building envelopes on the site. Accordingly view lines and building height and bulk were integrated / tested.



Above: Morphological analysis developed in support of a *Statement of Cultural Significance for the Concrete Aprons, Sullivans Cove. (Woolley 2011)* This work confirmed the concept of an 'inner' and 'outer' cove where reclamation generated the continuous Cove Floor (light red), with the concrete apron (dark red) forming a defined wharf edge/ service margin. It further reinforced the significance of the 'original shore' rather than the 'Wall to the Cove' as the principal spatial determinant.

Statement of Cultural Significance, Concrete Aprons, Sullivans Cove. Prepared for the Sullivans Cove Waterfront Authority. Leigh Woolley Architect. Aug 31 2011 This work then informed the initial (and revised) SDP for Mac Point (2017). Both documents incorporating this analysis are identified in the TPC Guidelines list, and accordingly are more extensively referenced in this review.

These views are then accommodated in the more encompassing analysis (*Woolley, 2018*) where views and view cones become part of a suite of urban design instruments, (in the context of the landform of Central Hobart) to consider building heights.

Has the case for a 're: set' been established ?

As the SDP (2024) (Appendix GG) states, (p.6) it is 'required to examine a complexity of issues and articulate a cohesive plan that maximises the sites potential to add to the Cove'.

While the SDP begins to establish a case for expansion of the civic and cultural precinct, (*Use*) and alludes to the importance of those connections between the City centre and Macquarie Point, (*Movement*) it has not established a framework for the significant scale (*Built Form*) of a development such as that proposed.

In essence the 're;set' is merely a catch up on changes that have already been made. It does not develop a framework where the scale / bulk and impact of the Stadium, as proposed, can be accommodated.

The purpose of a SDP is not to convince its author of the spatial history of a location, but to develop principles arising from such an analysis. These then need to inform a (spatial) framework (plan) for future development. This is neither the structure, nor the outcome of this SDP. (Appendix GG)

As the SDP was written in response to the TPC Guidelines for the project, it is also surprising that it does not refer to the landscape setting 'in the broadest sense'. (*TPC, Clause* 4.1.1) A cursory or preliminary analysis of landscape and visual qualities could then at least provide the context for measures that may be considered necessary to mitigate impacts. Instead it seeks to justify the indefensible, and this is notably the case with views and viewlines. In striving to limit the experience of landscape from 'the

broadest sense' to a few selected glimpses across the cove, it denies the way in which the public orient within the cove and the city. (This is also a criticism of the VIA)

While it may be possible to find locations where the proposed height and bulk of the Stadium will be obscured by other structures, *(Fig 53, p.48)* this is not the purpose of a viewline analysis.

Rather than acknowledging, or even bothering to research the documents that informed the previous SDP for Macquarie Point (2017), the author generates alternate preferred alignments.

As has already been shown, the 'established' views developed over a number of decades and are now (in large part) contained within the SCPS. Others are from public spaces (notably streets) where a landform characteristic, such as a ridgeline or change in level, invites 'pause', to take in the view. Battery Point views are instructive in this respect as they are particularly noticeable at the edge of the landform. ie. where the geology reinforces the human experience of 'the point'.

To take one view line as a case in point. Viewing along Runnymede Street toward the Cenotaph across the Cove, the noticeable change in level is evident near McGregor Street - itself a perpendicular alignment along the contour. At this location there is a sense 'of pause', emphasised by the corner, and the prospect out over the cove. Accordingly it has provided for some time, a viewpoint location for consideration of development within, across and beyond the central cove.

This location has also been instructive for development prior to considerations of Macquarie Point itself, as it confirms the importance of the (Cenotaph) headland as the geological balance forming the other side of the cove. This is an example of a view line from a view point that not only assists orientation, but assists in 'revealing' the structure of the cove, and through this the setting of the city.

By contrast the view points chosen within the SDP (Appendix GG) are from deeper within the streets of Battery Point where the landform is less pronounced and where other structures, including vegetation, mask parts



Above: An established Battery Point Viewpoint from Runnymede Street, adjacent MacGregor Street. This location has been used for some time to consider development scale within Sullivans Cove and Macquarie Point.

Opposite: By contrast, the view alignment deep along Stowell Avenue (p.46 SDP) is not at the Battery Point escarpment edge, it avoids alignment to the Cove Floor of Macquarie Point, and the vegetation in the street obscures the depth of view.



Fig. 49 View to Hunter Street and the Cenotaph from Stowell Avenue.

of the view, thus denying depth of view, (eg. Fig.49) or where alignments don't oversail the subject site at all ! (eg. Fig.48, 49). Rather than address the issue at hand, which is to develop a framework for the project site, these views instead seek to 'edit out' the site itself.

Moreover the role of publicly shared viewpoints is that they can be returned to, to provide orientation and connection to the place and form of the city as it develops. These locations are constants from where development can be considered and re-viewed. It is disingenuous to suggest otherwise, or at the very least not to include these locations as inherent to recent urban design and planning history.

This is also why the Cenotaph Headland is important to the city. It not only provides a place of orientation from land and water, it also provides the ground (as an elevated datum) from to which to scale the city and its setting. (see figure below)

While its role has long been recognised in the formation of settlement around Sullivans Cove, it is also the principal Viewing Point, (not on the Cove Floor) identified in the 1991 SCPR, offering multi-directional views.

"The location above Macquarie Point (previously Queens Battery) now the Cenotaph headland and War Memorial (*Hutchison and Walker 1925*) provides a publicly accessible and ceremonial location from which to view the city centre and its landscape setting - between mountain and harbour" *p. 43 (Woolley 2018)*

The importance and role of viewing points and view lines has long been recognised.

When referring to building envelope heights (Appendix GG p.59) contained within the revised MP masterplan 2017 (fig. 32.4 SCPS), the SDP (2024) does not seem to recognise that these were based (in large part) on the previously established view lines.

Accordingly, the deemed to comply heights (which varied across the Mac Point site) were established primarily in response to views out from the Cenotaph podium. The highest of these taking account of views down river and across the cove, and the lowest seeking to ensure the landform character of the Cenotaph headland was itself not unduly diminished, when viewing back across the cove.

The comment that the application of height limits is too blunt an instrument to shape and control development across a very large site, (*p.62*) is to disregard the anticipated layering of development back from the waterfront. At the same time it devalues or misunderstands the role of the previous development envelopes established in response to the location.

Height controls should always be in response to 'location' and 'form'. In this instance the location has well developed intentions, and even by 2017 with the '*Mona* : *Re:set'*, the larger development parcels, and an expansive central open space, (compared to the earlier Masterplan 2014) still had maximum height expectations.

While the scale of the spaces in the Mona Re:set were less intimate, the parcels generated were in response to the location, with those closer to the toe of the headland being of less height than those located more centrally. (*Refer Fig. 32.4 SCPS : Permitted heights - below*)

This stepping down to, or 'modelling' toward the water is wholly consistent with intentions identified within the SCPR 1991, whose design principles included (p.27) :

'To emphasise or expose 'the fall' between City and Cove including the quarry and cliff faces, and original shoreline.'



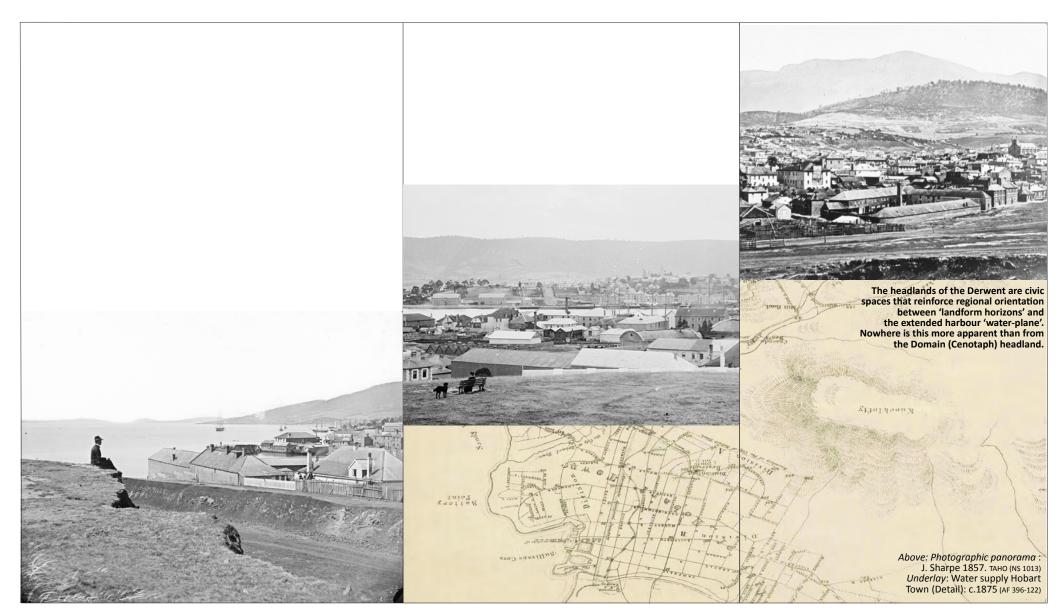


Above: The multi directional Viewing Point at the Cenotaph is arguably the most significant location (close to the City Centre) from which to appreciate the place of the city.

Woolley 2018 p. 44-45

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Viewpoints : re-viewed

The Viewpoints nominated by the proponent are principally clustered around Sullivans Cove. (*Refer VIA Report 30 Aug 2024*) These are shown on the topographic map of the centre of the dwelling region (below). Apart from View Point 1 (Rosny Hill) they are generally low lying. Accordingly they generally do not identify the proposed development within the city setting (except View Point 1).

The landforms comprising the 'Urban Amphitheatre', collectively contribute to the 'compact city within an expansive landscape'. (p.90 UDF) Therefore views need to be appreciated from both near and far.

Similarly, to prove that the proposal will 'seem-lessly integrate into its surroundings' additional Viewpoints are necessary to test this claim, and also reflect 'peoples visual and spatial experience of the proposed project... while moving in the broader area' (Clause 4.1.3 p.36) The additional suggested Viewpoints seek to address this deficiency.

Most of the additional views are more distant and accordingly need to be considered with appropriate (telephoto) photography. They include several more elevated views from the south and south west, including from the tiered residential neighbourhoods flanking the city centre. Additionally several further views from water level, notably at Long Point viewing due north up river, and from the edge of Bellerive Bluff viewing due west, provide alignments from two of the regions most accessible water-edge residential locations.

Nominated Viewpoints

Additional Viewpoints (suggested)....

DRAFT Suggested additional Viewpoints

To assist in appreciating the development site in the context of the landscape of the city centre, with views that are variously more elevated and diverse.



Viewpoint A Tasman Bridge

The elevated arrival across the harbour, availed by the height of the main bridge span, (60 m at apex) ensures the subject site is appreciated as a component of the Cove Floor, set beneath and behind the Cenotaph Headland.





Viewpoint B

Tasman Highway viewing across Ross Bay

The oblique view roughly parallel to the shore will locate the bulk and scale of the proposed building in the context of the Cenotaph headland and the arrival sequence to the city centre.

B1 Viewpoint B1

From Government House and Gardens across Ross Bay to Cenotaph Headland.

Viewpoint C

Davies Avenue viewing south east

The elevated view from the Davies Avenue ridge, at approx 50m contour, aligned with the port control tower will approximate the height of the domed roof form of the proposed stadium. (It is noted that the Port Control tower is 41m high, with the main platform at 36m approx.)

Viewpoint D West Hobart elevated slopes

The elevated slopes west of the city centre provide the backcloth (or dress circle) to the central area beneath. From approximately the 150m contour, (in this instance from Chadwick Court, West Hobart) the relationship between city centre, Macquarie Point and the harbour beyond are well defined.











Viewpoint E

Sandy Bay Hillside viewing north

The elevated residential areas above Churchill Avenue (approx. 150 m contour) extend the regional 'dress circle' allowing the promontory of the reclaimed edge of Macquarie Point, to be appreciated.



Viewpoint F

Long Point, Sandy Bay viewing north

From the datum of the water plane at Long Point, Lower Sandy Bay, the familiar scale of the regional landforms define the location of the city centre, the Domain landform and headland.



G

Viewpoint G Bellerive Bluff foreshore viewing west

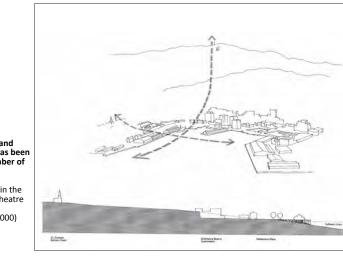
With the layered rise of hills to the landform horizon of kunanyi and the Wellington Range, the city centre is appreciated between the Domain headland and the mid ground scale of Knocklofty.





The suggested views acknowledge Macquarie Point as a significant promontory within the estaurine scale of the harbour and city setting. They seek to better 'locate' this edge of the reclaimed space of Sullivans Cove, in order to appreciate the scale and bulk of the proposed stadium.

All are from public locations and are intended to further consider the impact of the proposed development on the land forms and water-planes that define the city centre. They address specific views that are part of the visual amenity experienced by people, especially within the Hobart Municipality.



The role of View lines across the Cove Floor and between headlands, has been formalised over a number of vears.

Right : Sketch concept in the context of the 'Amphitheatre to the Cove' (Woolley / Shelton c. 2000)

Below : Woolley 2016 (Detail p. 34)

Far right : Connecting between headlands from ground level across the Cove Floor. The recent offset of IMAS from Princes No.3 shed has ensured the cove waterplane remains visually accessible. As a result the preettlement landform can still be experie

Right and below: When Mawson Place was redeveloped in the 1990's, the view line along Morrison Street 're-engaged the Cenotaph with the forecourt to rliament House. The alig ment was further consolidated by the Macauarie





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UDF : Site focus at expense of urban context

The Urban Design Framework (Appendix I) incorporates inputs from the various architects and landscape architects to the project. The Framework is a thorough and generally well considered document that has sought to consider the spatial characteristics that now define the Cove Floor. At the site scale the information provided is detailed, but this is less so at the urban scale.

This undue emphasis is also the case for the other design documents, (Appendix A, and J). When considering 'the place' of Sullivans Cove for example, the location of the two headlands are fundamental to the Cove's identity and structure. They are a geological fact, and in tandem with the presence of Hunter Island and the sand spit leading to the shore, inherent to the evolution of Hobart as a port reference, this approach mis-understands that the city.

This emphasis is acknowledged with figures now in the interim planning scheme (Fig. 22.7 already noted p.3) Surprisingly however the Urban Design Framework provides little or no urban analysis (including diagrams) beyond the site scale.

While the open space / landscaping strategy is more topographically considered, this work would seem not to have adequately informed the other disciplines. The strategy interprets the layered morphology of the site, acknowledging the hydrological confluence of the rivulets, while also interpreting the industrial heritage of the reclaimed surface.

Intentions are clear and consistent, with the evolution of the Cove Floor acknowledged as an extended public domain with a civic role. However the 'Connection to Country' section, while providing useful and insightful principles (UDF p.6-9) does not consider 'the place' of Sullivans Cove as defined by the headlands of the Domain and Battery Point.

As indicated, these are fundamental to the definition and identity of the cove and the role of the rivulets flowing into it. In this respect the 'context' for country is missing, and with it subsequent considerations of the 'Amphitheatre to the Cove' and the 'Urban Amphitheatre'. assume considerable disruption to existing activity, as

While it is appreciated that detailed information may (necessarily) be constrained to the 'subject' site. the scope of consideration, and with it the context of analysis for an Urban Design Framework, needs to be broader. These limitations have also influenced Appendix J, (Visual Impact assessment), and the breadth of viewpoints considered.

Adjacent Building Envelope Heights

Building envelopes outside the PoSS (Stadium) are generally identified at RL 24. It is stated that these 'align with the established height datum set by the existing built form on the southern side of Evans Street.' (UDF p.43 para 2)

However notwithstanding this built contextual (previous) envelope heights on the Mac Point site are not generated by street space scale intentions, but by view lines, particularly to and from the Cenotaph. These various envelopes (UDF p.43) need to be reconsidered in terms of their impact on view lines (identified within the planning scheme), particularly those not in the shadow of the Stadium.

Development on the Cove Floor is generally 'freestanding', frequently on the industrial concrete apron, and not part of a street space typology. Accordingly it generates its own context, and that is fundamentally to do with the urban role of the reclaimed space as an engineered, essentially 'planar' transition between city centre and harbour water-plane. It exists in counterpoint to the undulations of the landform and the water-plane datum.

Part of the consistent rationale for major development on the Cove Floor is that it be developed 'in the round'. This is recognised by the authors of the framework, (eg. UDF p.68) but it is not applied to these additional envelopes. The scale of these envelopes will be most apparent where they 'stand alone', as evidenced in particular by the proposed residential blocks facing toward Ross Bay. (UDF p.45)

The surrounding linkages (pedestrian and vehicular)





Intensity of development is anticipated in 'the basin', with diminishing density and built scale toward the Domain to the east, and Barracks Hill to the south west.

an appropriation of public land (and uses) in support of the Stadium. Similarly optimistic public movement expectations (generally pedestrian) assumes the construction of the Collins Street Active Travel Bridge, while the construction of the Northern Access Road will be fundamental to port functioning, (as well as the Stadium). It is noted that the junction / (future upgrading ?) with the Tasman Highway is not shown.

The long-held desire for the site to provide a (public) transport interchange has not been addressed, nor as yet have the location of rapid bus stops within the Hobart CBD.

The landscape and visual values and characteristics of the project site have already been discussed (in part). It is important to re-state that the differentiation of built form and landform is crucial to Hobart's urban identity.

As a city that is 'cradled' by the landscape, the role of differentiation (between the given landform and the built fabric of the city) is fundamental to an appreciation of Hobart's urban character, ie. It is fundamental that the layers of the landscape continue to be evident. Accordingly it is necessary to question the assumption that the impact of the Stadium 'is mitigated as the built form forms an extension of the perceived headland outwards toward the estuary'. (UDF p.67)

Similarly the assumption that the height and bulk of the stadium will not compete with the surrounding townscape, (UDF p.68) especially that located within 'the basin', is to also mis-understand the role of the basin as the location where density (and potential building height) are anticipated. This is not the case for the Cove Floor.

The CBD is recognised as the built centre of the city region, and as the principal activity centre in the state. The 'basin' is located behind the Macquarie Ridge with diminishing density and scale toward the Queens Domain, to the east / north east, and Barracks Hill to the SW. (NB. The diagram (UDF p.68) should refer to the full extent of 'the Cove Floor' that includes the subject site and the reclaimed space of Macquarie Wharf.)

' A small city in a large landscape '

The limitations of the extent of view lines have already been discussed. As part of the Urban Design Framework it is necessary to reinforce that the only elevated view (from those identified in Appendix I) that embraces the extended setting, is View 1 from Rosny Hill.

From this location (and from the additional suggested view lines p.15-17) it is important to ascertain and consider whether the height, mass and bulk of the Stadium will be 'in competition' with the (natural) landforms. From this view point (and a number of others) the opposite is presented. Given the bulk and height of the proposed Stadium the proposition that this is otherwise is difficult to support.

The view down river (UDF p.80) is shown as being largely retained, while elsewhere it is shown as being blocked by the Stadium. This representation is only possible because the line of sight is taken at some height above ground level, possibly from the top of the Cenotaph(?) It is not an alignment or view field that will be experienced by people, at ground level, on the Cenotaph Headland viewing point. It is misleading.

The proposed relocation of the Goods Shed (UDF p.88) will, (if feasible to dismantle and move) be placed on the northern side of the proposed Stadium adjacent the Cenotaph Headland. The 'toe' of the headland. and the potential to interpret the 'original' shoreline are significant pre-colonial features of this part of Macquarie Point. It is important to ensure that these characteristics of the site are not lost or devalued by this proposed move.

All cities are experienced as landscapes. As the built focus of a complex landscape, the urban form of Central Hobart engages its geo-morphology to provide the foundation to the city's unique form and character. Landform and built form galvanise to identify Hobart as a 'small city in a large landscape', its image sustained by careful consideration of the location and form of major development. Nowhere is this more important than at the land and water interface within Sullivans Cove and Macquarie Point.



References

Macquarie Point Multi -Purpose Stadium -Project of State Significance **Appendices**

PoSS Summary Report: Esp. Chapter 2 Landscape and Urban Form

Appendix A Architectural Drawings Appendix B Stadium Design Description Appendix GG Site Development Plan Appendix I Urban Design Framework Report Appendix J Visual Impact Assessment

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