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HOBART TOWN HALL

John Ramsay
Executive Commissioner
Tasmanian Planning Commission
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Via email: tpc@planning.tas.gov.au

Dear John,

**MACQUARIE POINT MULTIPURPOSE STADIUM PROJECT OF STATE
SIGNIFICANCE (PoSS) - Draft Integrated Assessment Report (IAR)**

Thank you for the opportunity to make this submission in response to the Draft IAR that was released on 30 March 2025.

We have been working closely and cooperatively with the State Government and the Tasmanian Planning Commission (TPC) and were very hopeful of the PoSS process being followed.

We are deeply disappointed and concerned that the Government has indicated that it intends to stop the PoSS process before it completes its work.

At its 28 April 2025 meeting, Council concluded that it does not support this project being built at this location, as the negative impacts outweigh the positive benefits.

In summary, Council has consistently maintained that the stadium will result in:

- significant damage to places of heritage significance (including the Hunter Street precinct and Cenotaph) and Hobart's heritage tourism brand;
- the lost opportunity, of what will be an inactive precinct for most of the year, in a prime and strategic location for the City;
- significant environmental concerns, as raised by the EPA in their submission to the TPC;
- the impact of the northern road in cutting off community access to the river;
- the very poor process that led to this point including the AFL overriding the approved plan for Macquarie Point and the abandonment of the POSS process; and
- the lack of critical transport infrastructure to support a functional stadium.

The purpose of this submission is to articulate the pertinent issues for the City of Hobart (City) with regard to the various roles it plays in this project. These roles are:

- as the council of the municipality in which the Project is located;
- as an 'Agency' (*planning authority*) as defined under the *State Policies and Projects Act 1993*;
- as an asset owner of local roads, footpaths and carparks, stormwater and lighting infrastructure;
- as an adjoining landowner to the Project of State Significance (PoSS) declared project area;
- as the body that is responsible for the future strategic land use planning agenda for the city;
- as the responsible Agency for enforcing a range of planning permit conditions; and
- as an advocate representing a range of different community views on issues such as Aboriginal cultural values.

The City holds similar views in relation to many of the Panel's findings as outlined in the draft IAR, especially as they relate to the City's key areas of responsibility. However, the City has already expressed these opinions previously in various submissions and meetings.

This submission, therefore, focuses on areas where a point of difference is apparent that may need further attention and resolution through the next stages of the PoSS process—if progressed—or where we can provide information or clarity on issues identified.

Yours sincerely,



Cr Anna Reynolds
LORD MAYOR

Wednesday 7 May 2025

Attached: CoH Submission to Draft Integrated Assessment Report

CITY OF HOBART

**MACQUARIE POINT MULTIPURPOSE STADIUM
PROJECT OF STATE SIGNIFICANCE**

Draft Integrated Assessment Report Submission

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Introduction

This submission represents the City of Hobart's response to the draft Integrated Assessment Report (IAR) prepared by the Tasmanian Planning Commission (the Commission) for the Project of State Significance (PoSS) Macquarie Point Multipurpose Stadium project (the Project) in accordance with the *State Policies and Projects Act 1993* (the Act).

In summary, the City of Hobart (the City) does not support this project being built at this location, as the negative impacts outweigh the positive benefits. The City has consistently maintained that the stadium will result in:

- significant damage to places of heritage significance (including the Hunter Street precinct and Cenotaph) and Hobart's heritage tourism brand;
- the lost opportunity, of what will be an inactive precinct for most of the year, in a prime and strategic location for the City;
- significant environmental concerns, as raised by the Environmental Protection Agency (EPA) in their submissions to the Commission;
- the impact of the northern road in cutting off community access to the river;
- the very poor process that led to this point including the AFL overriding the approved plan for Macquarie Point and the abandonment of the POSS process; and
- the lack of critical transport infrastructure to support a functional stadium.

The City notes similar findings have been expressed in the draft IAR by the Panel, especially as they relate to the City's key areas of responsibility, therefore the submission focuses on areas where a point of difference is apparent that may need further attention and resolution through the next stages of the PoSS process (if progressed). Or where we can provide information or clarity on issues identified by the Panel.

The submission also raises concerns for the City in relation to its various roles in this project. These roles are:

- as the council of the municipality in which the Project is located;
- as an 'Agency' (*planning authority*) as defined under the *State Policies and Projects Act 1993*;
- as an asset owner of local roads, footpaths and carparks, stormwater and lighting infrastructure;
- as an adjoining landowner to the Project of State Significance (PoSS) declared project area;
- as the body that is responsible for the future strategic land use planning agenda for the city;
- as the responsible Agency for enforcing a range of planning permit conditions; and
- as an advocate representing a range of different community views on issues such as Aboriginal cultural values.

Abandonment of the POSS Process

On 13 April 2025, the State Government announced that they plan to introduce 'enabling legislation' to Parliament to progress approvals for the Project and abandon the Project of State Significance (PoSS) process.

Foreshadowing this formal announcement, the City's Planning Committee on 9 April 2025, expressed disappointment with the State Government's handling of the stadium proposal, citing concerns about process integrity and disregard for the Tasmanian Planning System.

The Committee passed motions to urge the State Government to take account of the findings from Nicholas Gruen's independent review, properly respond to the draft IAR, address the Planning Institute of Australia's concerns, and respect community expectations for transparency and public involvement.

The Committee also noted the City's significant investment in reviewing the proposal and its process concerns, urging the State Government to maintain public trust by adhering to a transparent and objective planning framework.

In good faith, and in its capacity as the local government and planning authority for the wider area, and as an adjacent landowner, the City has drafted this submission noting that the State Government has indicated that, irrespective of the abandonment of the POSS process and introduction of 'enabling legislation', they will consider issues raised in submissions received in response to the IAR.

Submission Summary

A summary of the submission is set out below.

The City:

- Supports the Panel's interpretation of the Governor's order (the Order) that the scope of the Project is to include the related infrastructure and services necessary to support the stadium and its operations.
- Shares the Panel's concerns over the Project's consistency with the Mac Point Precinct Plan (the Plan), overall precinct functionality and asserts the need for the Proponent and TasPorts to review eastern boundary alignments as a priority to provide the necessary circulation space and realisation of the Plan.
- Notes, through its own economic modelling, whilst significant local economy benefits may be experienced through the realisation of the Project, the cost to the State and opportunity costs from the loss of realising alternative development outcomes for the site outweigh these localised economic benefits.
- Broadly agrees with the Panel's assessment that the size of the stadium is disproportionate to Hobart's small scale and established built form. The City has prepared, in conjunction with Leigh Woolley and its Urban Design Advisory Panel

(UDAP) a detailed urban design response to the draft IAR. It is worth noting, the City has requested a 3D model of the Proposal at multiple stages both to the Proponent and the Commission and has repeatedly been denied this request. This gap in the City's ability to analyse the project's visual impacts on the City is a missed opportunity for the Proponent and the Panel to receive this vital feedback from the City.

- Holds reservations about the dismantling/relocation of the Goods Shed and notes no updated Conservation Management Plan (CMP) has been submitted for either the Goods Shed or the Red Shed. The City would like to see alternative options considered which may contribute to Hobart's heritage in more innovative and impactful ways. The City notes that its remaining colonial built heritage townscape qualities are defining features of the City and are often a key consideration for people choosing to visit Hobart.
- Agrees with the Panel regarding the lack of engagement with the Tasmanian Aboriginal community and the inadequacy of documents submitted regarding Aboriginal heritage. Recommendations for meaningful Aboriginal community consultation and management of identified cultural items.
- Agrees with the Panel regarding the significant risks of large crowd events impacting public and road user journeys. Notes the need to improve pedestrian infrastructure and potential road closures during events as is currently undertaken for similar sized events.
- Asserts the importance of the Collins Active Pedestrian Bridge as a key requirement for the safe egress of patrons returning to the CBD and carparks. The City supports the use of off-street carparks and the charging of fees to cover costs.
- Notes that event management may be mitigated through careful planning with key stakeholders and recommends the establishment of working groups to address event management issues in due course.
- Shares the Panel's concerns regarding site contamination, groundwater, stormwater management, and the disposal of excavated material and assets, and the need for detailed approval conditions and management plans to mitigate these concerns.
- Agrees with the Panel regarding the lack of detail for construction programming and shares concerns over the interdependencies between delivery of major projects simultaneously. Further highlights the need for approval conditions to consider these issues.
- Other issues the City covers in the submission include the need for appropriate conditions to be imposed on any permit granted. As well as seeking clarification on the status of certain titles and the statutory process for subdivision.

1.0 Economic Impact

Summary

The City concurs with the Panel's concerns around the ability of the State to finance the construction of the Project and the associated long-term economic impacts this may have at the State and also on state funding available for other city priorities.

Council engaged SGS Economics and Planning (SGS) to peer review the economic reports supplied by the Proponent which included a Cost-Benefit Analysis, Economic Impact Assessment and a Financial Impact Report (see Appendix 1).

Given the Project will be located within the Hobart LGA and adjacent to Hobart's CBD, Council also engaged AEC Group Pty Ltd to undertake specific LGA-focused economic impact analysis to inform its decision-making (see Appendix 2).

The SGS review concluded that for both the City of Hobart and the Tasmanian Government, the costs of the project are likely to be higher than indicated, and the benefits are likely to be lower.

The costs of the Project were noted to include:

- The significant financial liability incurred by the Tasmanian Government due to the large capital expense of the project, including an unfunded component, and projected failure to produce a positive operating result.
- The constrained financial environment this will create in which the City of Hobart must compete for infrastructure expansion grant or loan funding of its own.
- The significant costs associated with infrastructure upgrades and maintenance of the stadium precinct, including upkeep of parks, active travel links and management of parking and increased road congestion, which will be disproportionately borne by the City, but which are uncosted and unconsidered in the analysis.

In terms of benefits of the Project, the report found that:

- Economic and financial benefits do not equate to costs, resulting in a negative benefit-cost ratio (BCR) and net present value (NPV) from the perspective of the Tasmanian Government.
- A number of issues with benefits specified in the cost-benefit, economic impact and social and cultural impact analyses suggest that actual benefits may be even lower than suggested in these reports.
- While the cost-benefit analysis defers significantly to the social and cultural impact analysis in containing unquantifiable, though valuable positive impacts of the proposal, the review finds that most of these impacts are in fact monetised and quantified as benefits. This recommends attention to summary measures of the

project's viability produced in the cost-benefit analysis; especially the negative net present value and benefit-cost ratio.

- The negative impact on the City of Hobart may be ameliorated by additional rates that will be raised from the stadium precinct, in line with similar recent developments of this kind.

The proponent's CBA prepared by KPMG, establishes a base case for the site, that in the event the stadium was not built, the site would sit vacant, unsold and undeveloped, holding and producing no economic value. SGS considers this an 'implausible base case for the stadium project'¹ and is reflected in the Panels concerns (to some extent) by their requests (as set out in the Project Guidelines) for the Proponent to prepare a comparison of the economic impact of the Project with that of an alternative investment utilising a similar value of public funds. The City concurs with the panel regarding the low level of output expected to be generated by the Stadium compared to the level of public investment proposed.

The opportunity cost of the chosen site is of great importance. Especially given the array of alternate uses previously endorsed, such as those contained within the *Reset Masterplan 2017-2030* published by the Macquarie Point Development Corporation prior to the stadium proposal, and the value of the site as the last major urban renewal opportunity in Central Hobart. Thus the failure to consider a separate base for this specific precinct may obscure the true incremental impact of the proposal, *in addition*, to the alternative investment case that was requested by the Commission.

Economic Impact on the City

The economic impact analysis undertaken by AEC Group explores the impacts the Project may have for the Hobart municipality, during both construction and operational phases. The modelling incorporates previous related studies and peer reviews, along with desktop research to inform the underlying assumptions and quantify the Project's economic impact on the Hobart LGA using input-output modelling.

Council recognises the limits of the economic impact information provided in the AEC report adopts Input-Output (IO) modelling, in that the multipliers used in the assessment were derived from a parent table, in this case, the 2021/22 Australian (national) transaction table (ABS, 2024a), without undertaking any primary data collection in Hobart. The AEC report also confesses to using economic modelling that assumes there is no budget constraint in place for residents and no supply side constraints.

The limitations stated in the AEC report on the negative reliability of Input-Output analysis are acknowledged regarding the potential economic impact to the City.

It is noted that the Australian Bureau of Statistics has stated that while IO multipliers may be useful as summary statistics to assist in understanding the degree to which an industry is integrated into the economy, their inherent shortcomings make them inappropriate for

¹ SGS (2025) Macquarie Point Stadium Economic Analysis Advice, SGS Economics & Planning, p.15

economic impact analysis

It should be emphasised that an economic impact study is not an evaluation tool to demonstrate the cost-benefit analysis of the proposal. Council was not able to undertake an in-depth economic study drawing on local data, and so the studies it has, do not consider and discount relevant matters such as foregone or opportunity costs, i.e. other events that may be harmed, impact on heritage tourism brand, other providers that will lose income (i.e. conferences) and alternative uses of the site that may be more frequently used, profitable or productive.

Construction Phase

As part of the economic impact modelling undertaken by AEC, it was concluded that, broadly speaking, there could be significant economic impacts within Hobart LGA. This is due to the significant investment of government funding in a new event venue. Overall, the total economic impacts on the local economy could amount to approximately \$143 million in output, \$65 million to the City's Gross Regional Product (GRP), \$44 million in local incomes, and support a total of 385 full time equivalent local jobs. However, this needs to be balanced with an understanding that economic modeling for alternative developments of this site has not been conducted and it is reasonable to conclude that a similar financial outcome during the construction phase of an alternative development scenario could be achieved over a longer timeframe.

It is also worth noting, the City shares the Panel's concerns regarding the lack of detail regarding construction programming and dependencies between related projects and the construction of the stadium occurring simultaneously (see Section 9). The City also holds reservations about the local construction industry being able to support multiple major projects being delivered simultaneously.

The City also concurs with the Panel around the significant financial risks to the State Government if construction delays occur which may also trigger AFL penalties.

Operational Phase

Modelling of the operational phase impacts undertaken by AEC examined the potential average total annual economic activity supported through the operations of the Stadium, with operations assumed to reach a 'stable state' (business as usual) of operating by 2032. The Project is expected to generate economic activity for the Hobart LGA through the following mechanisms:

- Operating activity of the stadium itself
- Activity associated with organising and hosting events at the stadium
- Activity supported more broadly in Hobart LGA on event days outside the Stadium, before and after an event
- Induced non-event day visitation and associated visitor expenditure.

Noting the abovementioned caveat of the AEC modelling, the project is estimated to contribute \$106 million annually in industry output to locally sourced businesses within the Hobart LGA regional economy through initial activity. A further \$72 million per annum in industry output is estimated to be supported in the economy through flow-on activity,

including \$33 million in production induced (i.e., supply chain) activity and \$39 million through household consumption induced activity (i.e., expenditure of households within the local economy as a result of a lift in household incomes).

This level of industry activity therefore estimates the following economic benefits each year from the 89 events they anticipate will occur at the venue (37 sports events and concerts, 52 business events):

- \$87.2 million contribution to Gross Regional Product (GRP) (including \$48.7 million through initial activity).
- 813 Full time equivalent jobs in the region (including 598 FTE jobs through initial activity), paying a total of \$62.8 million in wages and salaries (including \$39.9 million through initial activity).

Of the post-construction impacts, the largest impact is estimated to be delivered through induced non-event day visitor expenditure, followed by local and visitor expenditure on event day (outside the venue). Total induced visitor expenditure due to events at the new Stadium on non-event days is estimated at \$72.3 million per annum, with the majority coming from interstate visitors contributing \$44.6 million, largely due to these visitors anticipated to stay longer than Tasmanian residents who reside outside of Greater Hobart.

Total local and visitor expenditure on event days outside the Stadium is estimated at \$53.4 million per annum, with the majority coming from Tasmanian visitors who reside outside of Greater Hobart, contributing \$32.9 million per annum. Hobart LGA patrons are estimated to have a relatively marginal impact, as they constitute a smaller share of total patrons and have one of the lowest average spends on event days².

The City notes that 'expenditure switching' was not able to be considered in developing this analysis. It is therefore recognised that some residents of Hobart LGA and the rest of Greater Hobart may reduce their expenditure within Hobart LGA to redirect toward Stadium-related spending. However, this phenomenon is multidirectional—Hobart LGA residents may also reduce spending in other LGAs, while Greater Hobart residents may redirect their spending from their LGAs toward Hobart LGA. This dynamic underscores the complexity and uncertainty of expenditure patterns and redistribution.

It is important to note that if the venue is not as active as the assumptions made in the AEC report, this will impact on the benefits to the City economy.

Potential Economic Costs for the City

As set out in the SGS Report, the development of the stadium will require significant additional investment by other government agencies, levels of government and private service providers. The City, particularly, may be exposed to additional costs including:

- The maintenance and upkeep of areas surrounding the stadium, including local roads, paths, parks, active transport links and gardens (on its land).
- Additional public infrastructure such as park benches, CCTV cameras and wayfinding in the surrounding precinct

² AEC (2025) Macquarie Point Stadium Economic Impact Assessment, AEC Group Report, p.14

- Parking controls around the precinct, Queens Domain and in overflow areas across Central Hobart.
- Additional city cleansing requirements after large events
- Amplification of roads surrounding the precinct.
- Additional strain on Council facilities such as public toilets and bins.

Given the inability of the Project to consider these costs, without Council investment in these areas, the additional costs should be factored into the analysis. It also remains uncertain if Council rates, to be generated from the Project, could cover these annual costs.

Our economic studies haven't been able to explore in detail whether use of the new venue may reduce the economic activity and profitability of other entertainment and business venues currently operating in the city.

Built heritage tourism in Hobart

The City notes that its remaining colonial built heritage townscape qualities are defining features of the City and are often a key consideration for people choosing to visit Hobart³. The chosen site of the Stadium represents both a chance to increase the entertainment options for the inner City and weekend/nighttime economy diversification whilst potentially impacting negatively on the cherished colonial heritage townscape values.

The City recognises the dichotomy of this and stresses that the realisation of the surrounding precinct - that strives to consider, more comprehensively, the existing heritage setting - will be critical to avoid the wider Mac Point Precinct becoming a largely utilitarian service area for the generally inactive Stadium save for event days. Further concerns in relation to the Stadium's impact on the urban form of the City and its heritage values are set out in Section 3 and Section 4 of the submission.

2.0 Social and community issues

Council is cognisant that this project has attracted a high level of public interest and accordingly, has listened to and takes seriously the concerns expressed by community groups representing a broad range of views that have contributed to the public discourse on this project.

For instance, the Tasmanian Symphony Orchestra (TSO), a significant Tasmanian cultural institution which is located adjacent and in close proximity to Macquarie Point, has publicly expressed their concerns regarding the negative impacts from noise emissions the proposed stadium is anticipated to have on the orchestra's viability. The TSO is an acoustically sensitive receiver of the proposed stadium project so the protection of its interests and assets are of utmost concern as it has material consequences for the TSO and its continued creation of economic, social and cultural value for Tasmania. It is noted that the TSO events currently generate regular, significant visitation and spending on

³ Legislative Council (2016) *Final Report on Built Heritage Tourism in Tasmania*, Government Administration Committee B, Legislative Council, Parliament of Tasmania

hospitality and any impact on this could impact on economic benefits.

Council concurs with many of the issues previously raised by the TSO in its submission to the Commission's Guidelines, particularly its call for the State Government to introduce and implement a suitable environmental noise policy to protect the TSO and other organisations, businesses and residents directly affected by noise generated from this project.

A robust and adequate noise policy does not exist in Tasmania to assess the scale of development that is proposed and it is argued that a starting reference point should be relevant policies from interstate or overseas jurisdictions where a similar scale of development has been comprehensively assessed against stringent noise control policy. It is duly noted that the Commission's Guidelines, in relation to noise and vibration, are scant on appropriate detail and rely on subjective descriptions rather than objective, quantifiable noise criteria which are employed in other jurisdictions.

A noise policy should be designed to be unambiguous and outline absolute and measurable, numerical objective criteria to demonstrate during construction that the noise control requirements are being met and to assist with commissioning (on completion and during commencement of operation) that the noise criteria are being met. The TSO views this policy as the clearest way for the State Government to protect existing parties that stand to be adversely affected by this project and to provide an objective framework for the robust and independent assessment of environmental noise and vibration impacts for the development as it progresses.

Council agrees with the TSO's assertion that without an appropriate noise policy, the focus of any assessment of noise will be limited to 'impacts and effects but does not provide any indication as to what is to be done if there is such an impact or effect'. This leaves the TSO without recourse should there be a noise level incident (an increase in noise) due to the development that would disrupt the TSO's operations. The TSO has highlighted that there does not appear to be 'any requirement for the development to implement measures to reduce noise to an acceptable level', and there appears to be no enforcement mechanism for the proponent to be held accountable to meet suitable and defined objective noise levels, only to 'limit' noise.

Any such environmental noise policy would need to consider the current use of the TSO facilities which are multifaceted, comprising the Federation Concert Hall, the Recording, Film and Rehearsal Studio and the ABC Recording Studio all within the premises. These premises are activated 7 days and 6 nights per week as well as more than 30 concert occasions per year and 60 rehearsal days. The TSO has recently invested \$1.3 million in the acoustic upgrade of the Federation Concert Hall involving the installation of digital infrastructure in the hall to create a world-class performance, recording and filming venue for Tasmania.

The TSO is concerned that the typical forms of Environmental Impact Assessments (EIA) and Construction Management Plans (CMP) do not provide adequate protections for the TSO operations due to noise and vibration and it will not have any influence and control over the approval of such plans that are directly relevant given the acoustically sensitive

nature of their work.

The TSO is concerned that both the EIA and CMP will essentially be self-approved, and as such it formally requests that an independent approval and oversight Committee be convened for the approval of these plans. The TSO requests to be included as a member of this Committee to give it the necessary authority to approve these plans.

Council is also aware of various concerns raised by the Federal Group, owner of the Henry Jones Art Hotel (including 56 luxury rooms), the MACq 01 hotel (including 114 luxury rooms) and operator of various businesses such as the Evolve Spirits Bar, the Story Bar and the Old Wharf Restaurant, all of which are located adjacent to and in very close proximity to the proposed development. Also located at Hobart's waterfront, the Federal Group manages the Landscape Restaurant and the Long Bar and offers a variety of event spaces including the Atrium, Packing Room and Jones and Co Room which are used for hosting meetings, weddings and small conferences.

The Federal Group is also the owner of the former Retlas Bronze site on Evans Street which is earmarked for development into a boutique luxury hotel, which is located directly across the road from the proposed stadium development. The company's considerable business interests and landholdings in the Macquarie point area and historic waterfront make it a key stakeholder in the future development of the area, especially in the fields of tourism, hospitality and retail.

Council has taken seriously the key areas of concern that the Federal Group have raised publicly in their previous submissions to the Commission's Guidelines. Some of these pertinent issues include the potential noise disturbance during both construction and operation of the stadium, restricted access and decreased amenity on Evans and Hunter Streets for guests, visitors and suppliers to various businesses, and the consequential reduction in the quality of customer experience attributable to this loss of amenity.

The Federal Group has also expressed its reservations regarding the impacts on the visual lines and increased shadowing from the proposed stadium, changes to the maritime heritage experience for visitors in terms of ambiance and sightlines on the waterfront and the aesthetic design and physical dimensions of the stadium in terms of its bulk and height.

Council is concerned regarding impacts of the proposed stadium on the Royal Hobart Regatta Association which is a community organisation that is the oldest continuously operating regatta in Australia. The Regatta has placed its concerns on the public record in its submission to the Commission's Guidelines including that the document appears to be silent on how the operations of the Regatta will be impacted, and how the proponents will address these impacts. In addition, there appears scant detail regarding the relocation of the Macquarie Point Water Treatment Plant to Selfs Point as it relates to the operational headquarters for the John Colvin Memorial Grandstand and all other assets utilised by the Royal Hobart Regatta Association.

To safely and effectively conduct the Regatta, the Association utilises a number of assets on the foreshore, in the area that is colloquially known as the Cattle Jetty. The Association understands that some infrastructure will be demolished to facilitate road access in this

area and that will then deny, or significantly impede, access to the foreshore. The Commission's Guidelines also seem to be silent on the Federal Government's requirement for social housing, which is to be located in the area of the Cattle Jetty. The location of this housing will similarly impact upon the conduct of the Regatta.

Additional concerns held by the Association are ongoing access to the foreshore at the Hobart Regatta Grounds, proposed housing within the vicinity, future use and amenity of the only public boat ramp in the City of Hobart, and the construction of a significant roadway reducing and impeding access to the foreshore area. These are all important assets to the community, are vitally important to the successful operation of the Regatta and unless addressed will jeopardise the future conduct of the Royal Hobart Regatta. This may result in the end of one of Australia's, longest running regattas.

Another community group that has continually raised their concerns regarding the stadium project is the RSL. It has have argued for the historic, cultural and spiritual significance of the Hobart Cenotaph to the Tasmanian community, especially to returned service personnel, to be respected in the design of the stadium, especially impacts of the stadium on sightlines to and from the Cenotaph.

The RSL has maintained that the Cenotaph was purposely sited on vital ground in 1925 to command important sight lines. The sight lines to the Derwent Estuary, Battery Point and St Georges Church will be blocked by the stadium. These impacts cannot be avoided because of the height and bulk of the stadium. At 54m high and only 96m from the Cenotaph the stadium will dwarf the Cenotaph. The RSL has argued that no development should be permitted that obscures the Cenotaph from these sight lines which have been rightly protected by the Sullivans Cove Planning Scheme for decades.

As noted in Section 5.0 Aboriginal Heritage of this submission, the Palawa community have voiced concerns regarding the lack of engagement by the proponent in meaningful consultation, led and driven by the Tasmanian Aboriginal community, resulting in the project not properly considering Aboriginal cultural or spiritual values associated with the site.

The City's Heritage Committee has expressed that Macquarie Point is not an appropriate location for a stadium due to its intrusive scale and form and its dominating visual impact. In relation to the State Heritage listed Goods Shed, the Committee was unable to give its relocation proper regard without a Conservation Management Plan to review, and its proposed new location, wedged between the escarpment and stadium requires rigorous evaluation.

The Committee highlighted misgivings regarding the negative impacts of the stadium on Hobart's reputation as a renowned heritage City and cited the example of Liverpool in the UK which lost its UNESCO World Heritage status as a consequence of a stadium and large-scale development being constructed.

In previous submissions to the TPC on the draft Guidelines and to MPDC on the draft Macquarie Point Precinct Plan, Council has argued that the Project documentation has not adequately addressed impacts on the history and cultural and community significance of

the Huon Quays, the Regatta Grounds and most notably the Cenotaph and Cenotaph Avenue might be mitigated in the resulting built form. These features and locations have traditionally and continue to play a significant role in the communal and social life of the City.

From an urban design perspective, the City has long advocated for the broader Macquarie Point precinct to provide ample, high amenity, public spaces with numerous opportunities for pedestrians and cyclists to traverse in a way that enhances accessibility and usability for all users.

Over the course of the project, the City has continued to raise multiple issues regarding transport

Council notes that community polling carried out on the project, reported by the ABC on 25 February this year has indicated some opposition toward the project particularly among northern Tasmanians with a mix of views being expressed depending on age group.

3.0 Urban form planning

Summary

The City broadly agrees with the Panel's assessment that the size of the stadium is disproportionate to Hobart's small scale and established built form. The City has prepared, in conjunction with Leigh Woolley and its Urban Design Advisory Panel (UDAP), further responses to the Panel's findings for Section 3 below.

3.1 Urban form of Sullivans Cove and Hobart City

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'.

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 differentiate 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 (see Appendix 3).

3.2 Landscape and visual effects

An essential condition to any permit would be for landscaping. Landscape is a core part of the design and reading of the building (see Appendix 3).

Appendix J Visual Impact Assessment outlines the importance of the public realm landscaping to the overall proposal, providing benefits and mitigating the stadium's visual impact, including:

- Assisting in mitigating the impacts of the stadium bulk and scale.
- Softening the built form of the stadium.
- Allowing the stadium to co-exist with the Engineering Building within the local viewshed.
- Reflecting the natural and cultural values of the site and its context.
- Moderating the built form and ground level materiality.
- Along the escarpment, reinforcing the historical vertical edge of the river in this location, retaining the topographic importance of the edge.
- Strengthening the visual edge, providing further separation between the Cenotaph and the Stadium.

There is also a concern about light pollution from the stadium at night. The light spill requires modelling once materiality has been finalised and there should be consideration of timing restrictions for use of the lights, along with an assessment of the impacts of the proposed illuminated signs. It is also important to see the visual impact of the key views at night.

There are some initiatives that would contribute to creating a human-scaled environment within the landscape design package for public realm improvements including playful elements, water features, detailed paving treatments and native plantings. It remains to be seen if these critical elements will, in fact, be delivered.

Context

Considering key relevant materials identified in the draft IAR 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 serving 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 HIPS 2015) (also identifying the 'basin'), as well as the topographic condition of the Central Hobart terrain forming the Urban Amphitheatre (figs. 22.8, 22.9 HIPS 2015) 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 (HIPS 2015) (Clause 22.1.3.1), (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 the Proponent's Appendix GG (SDP).

3.3 Project Design

The City concurs broadly with the Panel's findings regarding the Project's design, and provides additional responses for consideration below. It is worth noting, the City has requested a 3D model of the Proposal at multiple stages both to the Proponent and the Commission and has repeatedly been denied this request. This gap in the City's ability to analyse the project's visual impacts on the City is a missed opportunity for the Proponent and the Panel to receive this vital feedback from the City.

The stadium is a pleasing form in and of itself, and the use of timber and transparent aspects to the roof and the lower walls at the edges go some way to minimising the scale and bulk, however the relationships that are set up between the proposed stadium and the places and buildings around it are not respectful or complementary due to the unavoidable contrast in scale and visual bulk, and the long expanse of inactivated frontage on Evans Street.

Stadium Design & Functionality

The stadium's design is well-documented, but there is a lack of clarity on its integration into the surrounding precinct. The reports do not sufficiently explain how the stadium will function on non-event days.

Public domain design along the eastern edge is unclear. The relationship between the stadium and adjacent mixed-use developments is not well-defined. The reports do not describe how the Stadium is part of an integrated Precinct. Computer renders omit other precinct buildings, and the public domain plan is silent on the interface with adjacent precinct buildings. Whilst we acknowledge the mixed-use developments along the eastern edge will be part of a separate application, the relation and design of the stadium and those buildings are integral to a success of the precinct. Hence the application should provide a concept for the ground plane and those buildings. There needs to be a 'proof of concept'.

No evidence has been provided as to why the project has been sited in this particular way; or alternative options been tested. It is assumed that given the geometry and size of the site along with the scale of the stadium, there is no alternative layout.

Visual Assessment Summary

The visual assessment summary confirms and acknowledges that *"the height of 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 above."* However, the response to the POSS guidelines suggests that the visual bulk of the stadium does not impact on the surrounding natural features. Several mentions are made to reference the semi-transparent materiality and shape of the dome reducing visual impact in its landscape

setting, which in UDAP's opinion, cannot be relied upon given the material illustrative nature of the montaged views. It is also noted that only a location and general description has been provided for each view without specific details such as elevation, perspective or camera lens angles.

UDAP also questions the likely effect of glare and reflectivity of the roof dome materials within the contextual setting of views specifically from elevated locations (see Appendix 4).

3.4 Signage

The City agrees with the Panel that insufficient detail has been provided of the proposed signage to make a thorough determination of its quality, integration, design and potential visual impacts. While the signage report refers to good design practice in terms of wayfinding, insufficient information is provided showing how it is to be incorporated into the landscaping throughout the site.

The signage, naming and identifying of the stadium is considered to be an important element in the context of the sports facility. It has a key role in guiding visitors by identifying the main entrances whilst providing a focal point where the building addresses the road frontages. Although subject to further details, it is apparent that the proposed scale of the signage is proportionate to the size of the building with the potential to be well integrated into the design of the stadium. This approach has been extended to ancillary signage throughout the site.

The Panel states that "signs should be responsive to the context of the surrounding area, rather than the building they are attached to. Their design, fabric and colour scheme should respond to the surrounding environment and its spatial arrangement, rather than project out of it." The signage is well setback within the site and proposed to be incorporated into the architecture of the building. Due to the proposed scale of the development, the broader site is considered to form the surrounding environment and context for signage.

The City does not see relevance in the Panel's comparison of the horizontal length of the signage to the vertical height of buildings nearby or the naming signs having to accord with the scale and details of nearby heritage buildings. The stadium is significantly larger in scale than these buildings and signage is not viewed in the context of the heritage buildings but the stadium site itself. Although signage is tightly controlled throughout the city and Sullivans Cove, signage of significant scale already exists, but not located in the context of such a large site or comparable built form.

Under *25.13 Matters to be Considered* of the Sullivans Cove Scheme Signs Schedule, rather than focusing on context, there is emphasis placed on the cumulative effect of signage, visual clutter, appropriateness of scale relative to size of a building and impact on the building it is to be affixed. It also allows discretion for a sign to be 7% of the area of the façade. It appears that proposed signage scheme would align with the Sign Schedule of the Sullivans Cove Scheme albeit not envisaging a structure of this nature.

The intent of the quality and integration of the signage solutions throughout the site is largely endorsed, however it should be subject to the approval of a detailed signage plan.

4.0 Historic cultural heritage and community values

4.3 Historic Cultural Heritage

4.3.2 Dismantling/relocation of heritage listed buildings

The Red Shed

It is noted that a new Conservation Management Plan (CMP) has not been supplied for the Red Shed and therefore decisions are yet to be made about its potential retention / relocation. This documentation should have been provided to the TPC at the time of lodging the application so that an appropriately well-informed decision be made. It would be pe-emptive and tokenistic to approve the demolition or removal of this (or any) structure of local heritage significance on the basis that a yet-to-be prepared CMP would guide its future.

Notwithstanding the above, the relocation or storage of the Red Shed for future re-erection at an unspecified place do not seem to accord with its modest level of heritage value. Its removal, though having some adverse impact, is likely to be assessed as acceptable in the context of the Project.

The Goods Shed

The City concurs with the Panel's point raised at 4.3.2 (g), that 'the methods for dismantling and relocation of the Goods Shed have not been stated'.

Further to this argument is that an updated CMP has not been provided, nor has a detailed methodology and construction plan that shows re-location is technically possible and precisely how it would be undertaken. It is necessary to show that re-location is actually possible and to specify precisely what changes or interventions (i.e. new foundations, replacement of defective members, faithful sequencing of moved components) would be involved so the heritage impact can be properly assessed.

Moreover, the extent to which the re-location, re-orientation and adaptation of the Goods Shed would affect the State heritage values is not clearly understood in terms of physical aspects such as original fabric or design, or intangible features such as use or association. The changes that would result from the Project need to be systematically related to the attributes of the Goods Shed which underpin its State Heritage value so that the Commission can understand the heritage effects of the Project.

Given the high-level adverse heritage impacts of this Project on the Goods Shed, typical mitigative measures such as oral history, archival recording, on (and / or offsite) interpretation of the history and cultural significance (all of which should occur) are unlikely to be commensurate with the scale of heritage impact.

If the detailed methodology and construction plan, along with a new CMP concluded that

the core aspects of the heritage value of the Goods Shed could not be retained by the proposed re-orientation, re-location and adaptation, more radical mitigation might be considered, such as not seeking to retain the structure and installation of an interpretive exhibition on the site and saving the funds from its re-location to contribute to Hobart's heritage in more innovative and impactful ways. Please refer to Appendix 5 for more information.

This advice has been provided without the benefit of a CMP for the Red Shed and the Goods Shed being available to analyse.

5.0 Aboriginal heritage

The following section on Aboriginal heritage has been prepared based on specialist advice obtained from Sharnie Read, Aboriginal Heritage Advisor from Paliti rruni – Island Spirit (see Appendix 6).

The City notes that the Panel was unable to make findings on the impact of the Project on Aboriginal heritage and cultural landscape values in the report due to the absence of feedback provided by the proponent through engagement and assessment by the Aboriginal community. Furthermore, the City agrees with the Panel's view that 'only Aboriginal people can truly speak to and understand the Aboriginal cultural landscape values of the place'.

In a similar vein, the City holds misgivings regarding the adequacy of the documents submitted regarding Aboriginal heritage (Appendix HH & Appendix K) because of the lack of engagement by the proponent in meaningful consultation with the Tasmanian Aboriginal community.

It is noted that additional reports were supplied on 31 January 2025 to the TPC as part of a further information request, namely, Annexure N: Tasmanian Aboriginal Community Engagement (Cultural Heritage Management Australia) and – and Annexure O: Aboriginal Heritage Assessment Report (Southern Archaeology). These reports, although not subject to peer review due to budget and time constraints, do not alter the following advice regarding the impacts of the Project on Aboriginal heritage.

5.1 Aboriginal heritage materials

The report entitled *Previous Aboriginal Heritage Investigations* – (Macquarie Point Development Corporation, July 2024) at Appendix K, which comprises mapping of cultural sensitivity and potential cultural material is consistent with accepted practice in the field of archaeology. However, it is not necessarily accepted by the Aboriginal community as an appropriate method to protect Aboriginal heritage.

This methodology only serves to protect one element of heritage, that being physical or tangible objects and is the statutory approach legislated through the *Aboriginal Heritage Act 1975*. However, this approach does not involve the necessary consultation that is

required with the Aboriginal community or any consideration of Aboriginal cultural or spiritual values associated with the mapped areas.

It is evident that this report has been prepared from a scientific view rather than an Aboriginal view which alters the value attributed to the tangible objects and minimises the significance of the items or material and their association to cultural values.

The Aboriginal view is that such items are part of a greater picture or story of culture and country associated with the material that is a direct connection with culture.

5.2 Aboriginal cultural values and landscape

With respect to *Pre - Stadium Cultural and Landscape Values Assessment* (Southern Archaeology, August 2024) at Appendix HH, the information contained regarding ethnohistorical data is extensive in its nature but is not considered culturally adequate.

This report provides a comparatively detailed overview of the traditional occupation of the much broader boundaries of the country of the Tasmanian Aboriginal Southeast Nation and associated Aboriginal groups of the southeast nation, however it only provides a *limited* summary of land use practices associated directly within the project boundary.

Some references are made to the observation of Aboriginal people's seasonal movements along with descriptions of cultural materials as observed and recorded during the early 18th century, but these are not directly within the project boundary. While it is accepted that limited historical records will impact on the results of such research, it is seen as inadequate research if not accompanied by Aboriginal community knowledge and input.

It is acknowledged that while this report might technically meet the requirements of section 5.1 of the TPC guidelines, from an Aboriginal community view, the report is not representative of the standards or expectations of Aboriginal community focused research that includes meaningful engagement and reciprocity between the researcher and the individuals / communities involved in the research. This report relies on historical records from only a non-Aboriginal view, whereas it should, but does not, provide detailed records or descriptions of generational or inherited Aboriginal knowledge.

The City highly recommends that the proponent engage in meaningful Aboriginal community consultation, that is led and driven by Aboriginal people. Furthermore, it is recommended that the future management of 6,596 cultural items identified in the report is a priority and Aboriginal community consultation should be undertaken as a matter of urgency.

6.0 Use and activity

6.2.3 Upper Queens Domain

(f) The City acknowledges the challenges around the parking management of the Upper Queens Domain and is actively engaged in the parking and transport management of this part of City. The City regularly hosts simultaneous events and with careful integrated transport and event planning, believes that scalable event management plans can be developed to manage the requirements for patrons and the public transport network to ensure existing users of the Domain can maintain access and egress.

Further to this, the City considers that there are only a limited number of events held on the Queens Domain that would draw their own significant demand for parking across the wider area. These include:

- Anzac Day Parade / Service;
- Royal Hobart Regatta;
- Domain International Tennis Tournament;

(g) For local sporting games occurring at conflicting times, as discussed in the response to

Section 6.2.3 (i) and (j), it would be feasible to close part or all of the adjacent off-street carpark serving each sporting field if required.

Conferences would most likely occur during business hours, at which times the majority of public parking on the Queens Domain is already made available for all day parking (for a fee) by the City. This parking would be available to conference visitors, and given the City currently makes these spaces available for all day parking for commuters working in the Hobart CBD and its surrounds, it is not considered that additional demand for these spaces would create an unreasonable impact on existing uses during business hours.

(h) The City is of the view that the off and on-street carparking located on the Queens Domain will be sought after by patrons of events at the proposed stadium, and with high quality pedestrian connections in place to cross the Tasman Highway (the Bridge of Remembrance and the underpass under the Tasman Highway at McVilly Drive) this parking may be suitable and appropriate for patron use.

(i)& (j) The City supports these conclusions, but is of the view that such management will be feasible and functional. In the past, parking at the Aquatic Centre has been protected by staffing the car park, and for the Domain International Tennis Tournament, the 'TCA Car Park' opposite the event site is closed to public access on event days, and reserved for use by visitors to the Tournament.

These measures can be achieved, and while there is a cost in doing so (loss of revenue from paid parking if a carpark is closed to public access, and cost of implementing closures of car parks and staffing closures as required), there is also the opportunity to a fee to be charged for use of car parks and car parking spaces not required for conflicting events. This fee could cover the cost of implementing changes and staffing off-street carparks, and potentially could also be used to raise funding to construct infrastructure upgrades on the Domain, or for pedestrian upgrades in the area surrounding the proposed stadium.

If the event parking arrangements put in place on the grassed area adjacent to the Cenotaph were also utilised, and a suitable fee charged, this would be expected to both provide a large supply of parking with close access to the stadium and provide a significant revenue stream that could contribute to the costs of pedestrian upgrades in the area.

6.2.4 Other use and activity in the surrounding area

The City appreciates the Panel's concerns regarding the operation of adjacent streets during events, in particular Evans Street and Hunter Street, however, as established through the City's busy events calendar, the ability of the City and Sullivans Cove to accommodate multiple events simultaneously is well established.

The City welcomes further dialogue between the proponent and the panel to go through various options to potentially alleviate some of the Panel's concerns regarding the potential conflict between vehicles and pedestrians.

7.0 Transport and movement

Summary

The City agrees that there is a significant risk that large crowd events held at the stadium would negatively impact on the journeys of the public and other road users travelling to, from, or through central Hobart. Analysis undertaken by GHD reiterates these concerns (see Appendix 7)

How significant this disruption would be will depend on a number of factors, including the success or otherwise of the countermeasures proposed to mitigate the risk:

- provision of new public transport infrastructure and increased services;
- provision of improved pedestrian infrastructure on pedestrian desire lines to limit any need for lane or road closures on surrounding arterial roads, and;
- the ability to schedule large crowd events at times when the expected most intense generation of crowd and vehicle movements associated with those events (the period immediately post event) do not coincide with periods of high demand on the surrounding arterial road networks (weekday commuter peak periods, and weekend mid-day periods).

7.1 Pedestrian Movement

7.1.1 Post-event pedestrian movement

(c) The City agrees that existing pedestrian pathways and linkages to the Macquarie Point site are currently inadequate to cater for the significant pedestrian activity that would be

associated with post event discharge of patrons from a stadium, without requiring extensive temporary event traffic management and control.

It should be noted that the City is of the view that existing pedestrian pathways and linkages will be inadequate to appropriately cater for any significant redevelopment of the Macquarie Point site from its current industrial use, and that as such upgrades to the footpaths on Evans Street, Hunter Street etc will be necessary to facilitate the day to day use of the Macquarie Point precinct regardless of its future use.

In relation to the specific section of footpath on the south-eastern side of Davey Street between Evans Street and Hunter Street, this section has a current minimum width of about 3.7m, which could be increased to a minimum of about 7.0 metres, if the indented parking and bus zone were removed. If required, this could be facilitated by reconstructing the parking bay and footpath to be at a consistent level, with a flush kerb and removable bollards providing separation (the system used successfully in the Salamanca Place precinct). This would allow the parking and bus zone to be removed, and a wider trip free footpath provided during events where significant event pedestrian flows are anticipated.

(d) The City agrees broadly with this comment, but also notes that it is considered likely that many patrons of stadium events will choose to drive a private vehicle and park in available public and private on and off street parking spaces in the surrounds of the area. The largest supply of these parking spaces (particularly when events do not coincide with business hours) are in the Hobart CBD, and in relation to on-street parking the inner suburbs such as North Hobart, West Hobart etc, where during business hours many city workers park and walk into the CBD.

The City expects that as such, there would be strong demand for pedestrians post event walking back to the location of their parking to seek to cross Davey Street and Macquarie Street in the vicinity of the Brooker Highway, Campbell Street and Argyle Street to return to those vehicles.

(f) The City broadly agrees that it is difficult to manage the large flows of pedestrians that exit large events, and that historically it typically requires short term road closures to ensure public safety. For previous such events at the Regatta Grounds / Cenotaph or on the Macquarie Point site, this has included short term road closures on Tasman Highway / Davey Street as large crowds of pedestrians can and do tend to choose to take over those spaces regardless of the messaging and temporary infrastructure that is put in place.

Overall, the City would have no particular concern with short term road closures on local roads under the management of the City of Hobart (Evans Street, Hunter Street, Campbell Street etc) to facilitate safe and appropriate post event pedestrian movements, but also acknowledge that such closures (or lane closures) on the important state owned and managed roads (Davey Street, Macquarie Street, Tasman Highway and Brooker Avenue) would be much more disruptive and problematic.

The City is of the view that pedestrian footpaths on Evans Street, Hunter Street, and the southern side of Davey Street between Evans Street and Elizabeth Street, along with infrastructure improvements to facilitate the placement of crossing facilities for pedestrians

to cross Evans Street and Hunter Street that as close as practically match the desire lines of pedestrians, will be necessary to improve pedestrian access to the Macquarie Point precinct.

This will be important regardless of the future development of the precinct (assuming that the precinct contains public uses) but will be of significant importance if a stadium is developed in the precinct, as it will minimise the need for special event road and lane closures during smaller events, and in the lower pedestrian volume times prior to and during larger events.

The City has in the last ten years developed significant expertise in designing and implementing pedestrian treatments in the Morrison Street – Castray Esplanade – Salamanca Place precinct, where design treatments utilising flush kerb lines, and relocatable fixed bollards to separate vehicular and pedestrian zones have been successfully used. These treatments allow complex urban spaces to be flexibly designed such that they can be easily changed from 'normal' arrangements to 'event' modes.

The City is of the view that a similar treatment could be designed and constructed on the key pedestrian desire line on the Hunter Street northern footpath and through the crown owned parcel of land at 47 Hunter Street and across Evans Street to the Macquarie Point site. This would allow a high quality wide pedestrian linkage between Franklin Wharf and the Macquarie Point site, that could be further widened on event days.

It is the view of the City that in the event that a stadium is approved, a working group comprising representatives from key stakeholders (including City of Hobart, State Growth, TasPorts etc) should be immediately formed and tasked with progressing this key pedestrian upgrade. Such an upgrade would likely need to be initially constructed in temporary materials to be ready for the opening of the stadium, and then constructed permanently in high quality materials after considering its function and success during initial events, and as funding becomes available.

(i) Response to Panel's concerns regarding Collin's Street (paragraphs 4 and 5):

The City agrees that there is no developed design, cost estimate or construction methodology for a Collins Street pedestrian bridge sufficient for it to be able to be considered a key part of any proposed stadium development.

A Collins Street pedestrian bridge has however been identified as an important future pedestrian linkage to improve pedestrian accessibility between the Hobart CBD and the Cenotaph / Macquarie Point precinct and Inner City Cycleway, that in the view of the City should be progressed regardless of whether a stadium forms part of that precinct.

A key constraint faced by the Cenotaph / Macquarie Point precinct is the disconnection between the precinct and the Hobart CBD caused by the key state road network (Davey Street, Macquarie Street, Brooker Highway and Tasman Highway), and the perceived and actual difficulties that crossing these roads cause for pedestrians seeking to move between these zones.

Given it is unlikely that these roads are going to become less important to the statewide and regional transport network, the need to keep these roads open and operating at sufficient capacity will remain an ongoing constraint.

The only feasible way to provide a high-quality pedestrian linkage would be through grade separation, via a pedestrian bridge (such as a bridge between the Cenotaph and CBD via Collins Street, or a pedestrian underpass (such as a linkage from the Elizabeth Bus Mall to Brooke Street via Franklin Square).

In terms of the impact or desirability of a Collins Street pedestrian bridge introducing large number of pedestrians onto Collins Street (into the Campbell Street and Argyle Street area), the City is of the view that any measure that reduces the number of pedestrians using and interrupting vehicular traffic on the state road network, and instead focuses those pedestrians into the commercial heart of the City is a net positive.

Context

In response to comment's provided by DSG:

The City understands that there are currently a number of events each year for which lane closures or full closures occur on Tasman Highway – Davey Street or Macquarie Street.

As such, lane closures or full closures are certainly possible, but it should be noted that these occur only for short-limited periods, and also occur on public holidays, evenings or weekends, at times of the day when such closures are considered reasonable in terms of their disruption on the travelling public.

They are also for events that happen once a year (Anzac Day Parade, Run the Bridge, Hobart Marathon etc.) and are extensively advertised to the public for weeks in the lead up to the disruption using Variable Message Signs, advertising etc.

While it is a matter for the Department of State Growth, it would be problematic to the transport network, and difficult to effectively communicate if there were closures of lanes or roads routinely required for events at the proposed stadium.

Section 7.4 Parking

(c) The City owns and operates three large multistorey car parks in the Hobart CBD. These are the 'Argyle Street Carpark', the 'Hobart Central Carpark', and the 'Centrepont Carpark'. The 'Salamanca Square' carpark and the 'Melville Street Midtown Carpark' are other multi-storey car parks in which the City provides public parking.

These multi-storey car parks have only limited spare capacity available during business hours, but would have a significant amount of spare capacity available to service potential events on weekday evenings, on public holidays, and on weekends.

For these multi-storey car parks to be utilised for high patronage events at a potential stadium (which would most likely be in the evenings / night, or on weekends or public holidays), the hours of operation of these car parks would need to be extended. This is

typically feasible, but carries costs associated with provision of staff and security.

For large events, an appropriate fee could be charged for the use of these facilities.

In general, patrons would be expected to prefer to find free on-street parking, due to the cost saving and ease of access compared to entering and exiting a multi-storey carpark.

There are at times delays and congestions exiting the Argyle Street Car Park. This is most commonly an issue on weekday afternoons due to high numbers of exiting vehicles combined with high pedestrian and general traffic on Argyle Street itself.

(f) While the views of the areas at the City that manage the sporting facilities and off-street parking areas on the Domain would need to be sought, the City is aware from previous large scale public events that there is a need to ensure that patron parking for sporting facilities on the Domain remains available, if the times of demand for these large scale public events crosses over with the operating hours of these facilities. This is particularly important for the Aquatic Centre, which has many patrons with limited mobility which rely on the on-site parking to be able to access the facility.

As previously described, important carparks could be managed for events by staffing the entrances, and the costs of undertaking this staffing recovered by the charging of a suitable fee for use of off-street parking spaces where capacity exists.

(g) At the aquatic centre, and at other car parks servicing particular uses on the Domain when the times of use of those facilities conflicted with a large public event at the proposed stadium, it would be necessary for the City to either close off parts of the car parking or to have an employee supervising access into the carpark to ensure that it is used by patrons of the facility.

When required, this would impose labour costs on the City, however it should be noted that on days where parking demand is expected to be sufficiently high so as to require active management, there would also be the opportunity for a suitable fee to be charged for parking, allowing such costs to be re-couped.

Consideration could also be given to providing the normal special event parking on the grassed surrounds of the Cenotaph and charging an appropriate fee for the use of the facility only where alternative event day public transport provision has not been put in place.

8.0 Environmental effects

8.1 Site contamination and suitability

Council agrees with the Panel's comments as well as the issues raised by the EPA in its submission (Dated 24 October 2024).

Council wishes to formally acknowledge that appropriate approval conditions will need to

be drafted to address the Act pursuant to which, and the permit, licence or other approval in which, each condition would normally be imposed. Drafting of these conditions may require direct input from the Council, at the appropriate stage of the assessment process.

If the Environmental Site Assessment report concludes that remediation and/or protection measures are necessary to avoid risks to human health or the environment, a proposed remediation and/or management plan must be submitted as a condition endorsement prior to the issue of any approval under the *Building Act 2016* or the commencement of work on the site (whichever occurs first). Any remediation or management plan involving soil disturbance must include a detailed soil and water management plan to minimise off-site transfer of potentially contaminated soil or stormwater.

8.2 Groundwater

Council agrees with the Panel's comments as well as the issues raised by the EPA in its submission, dated 24 October 2024.

Council wishes to formally acknowledge that appropriate approval conditions will need to be drafted to address the Act pursuant to which, and the permit, licence or other approval in which, each condition would normally be imposed. Drafting of these conditions may require direct input from the Council, at the appropriate stage of the assessment process.

8.3 Stormwater

Council notes the concerns raised by the Panel and has provided detailed responses below. In addition to this feedback, Council wishes to note that management of the northern access road proposed to run over the Hobart Rivulet will need to be carefully considered.

Council provides the following feedback to each of the points raised by the Panel:

(b) Council notes that previous use of the area as a TasRail and ports storage area means that historically much of the site has been impervious.

(c) The stormwater line to the east draining catchment 5 and the line to the southeast draining catchment 4B (SW4B/4 pg. 29 Appendix BB) are not shown on Council's assets register and are likely to be TasPorts SW lines. Use and ownership of these lines will need to be confirmed.

(d) Council notes that there are several unconfirmed variables including ownership and capacity of some of the pipes included in this assumption. Council also notes a number of assumptions that may be incorrect including the assumed 1% grade for the pipe servicing catchment 3, where advice has stated specifically that "pipe has a low grade, is subject to tidal inundation and has issues with sediment build up". This advice does not appear to have been incorporated in the capacity estimate.

The proposal flagged to use the unconfirmed pipe at area 4B to drain the stadium roof is subject to significant assumptions given the lack of detail on grade, capacity and ownership

of this pipe (SW4B/4 to SW4B/1). Whilst this option may be possible these assumptions must be confirmed. From Council records it appears that this pipe is in TasPorts ownership. The suitability of draining the stadium through a private pipe system must also be confirmed.

(e) Overland flow paths must be clearly identified and managed through the site to ensure downstream flow does not adversely impact neighbouring properties. Any impacts on neighbouring properties should be clearly identified.

(f) Council agrees that the potential for exacerbating flooding on adjacent land has not been thoroughly addressed considering the mapping on Page 11 of the BMT Macquarie Point Stormwater Management Plan - Final Report, that shows the areas south of the stadium may experience flooding.

Also note that the climate change factors have recently been updated and factors used in the modelling are no longer current. It is unclear if the flood report takes into account the flow from the development site when fully developed.

(h) Council concurs with the Panel on this issue.

(j) Council concurs with the Panel on this issue.

(l) Council notes that while the discharge targets from the State Stormwater Strategy are generalised, it could be possible to adopt site specific discharge targets based of the DGV values for the lower Derwent/ Derwent Estuary - Bruny catchments. DGVs for Hydrological Region 1 Tasmanian Inland Waters.

Council notes there have been some discussions that storage and reuse of roof water may be able to be managed on Council land, however, this will need to be confirmed.

(m) Council notes the likely specific impact of significantly increased litter loads given the proposed use and identifying how these loads will be prevented from entering the Derwent is paramount. The Environmental values report does not address the possible impacts of increases in stormwater discharge on the marine environment. This assertion has not been confirmed or denied by the ecological report.

(n) Council concurs with the Panel on this issue.

8.4 Excavated material management

8.4.(i) Current Landfill space

The City shares the Panel's concerns regarding constraints on available nearby landfill sites. McRobies Gully Waste Management Centre (McRobies) may only be able to accept low quantities of fill from the Project. The Hobart City Council Good Neighbour Agreement imposes a cap of 2,500 tonnes per week to limit clean-fill large-truck movements to fewer than 20 per day. The City understands the estimated total for the Project is 140 per day. Additionally, our annual caps are already allocated to existing contractors. These caps

could be raised considerably, but this is unlikely to be supported.

The City would like to understand the proponent's intention regarding disposal of this volume of fill. It is acknowledged that Glenorchy City Council may be in a position to accept some of it, and Southern Waste Solutions Tasmania has communicated some limitations with the Copping Landfill site. It is also noted that the difference in transport cost from the City to Copping versus the City to McRobies is an order of magnitude.

The City would appreciate the opportunity to discuss this issue in more detail during the Hearings or through further meetings.

8.5 Noise

Council wishes to acknowledge the Panel's comments. In response to the applicant's documents lodged, the City undertook a peer review of the information provided (pre-January 2025) and has included the information in Appendix 8.

The Council welcomes receiving additional information from the Proponent to address the concerns raised.

8.6 Lighting effects

The Panel raises some key deficiencies in the lighting assessment, particularly around the conceptual nature of the lighting scheme. Although detailed, the analysis is based on multiple assumptions. The report itself even states the following:

"The sports lighting scheme and arrangements are still in development and the sections below are based on the current concept design"

The level of luminance generated as a result of the specifics of the transparent roof design does not appear to be considered and could vary depending on the final materials used and the design. This factor is considered relevant, considering that the transparent section of the domed roof equates to a significant portion of the built form and is the most visible element of the stadium from further afield.

There is limited detail on the peripheral lighting for the stadium however the potential impacts can be adequately managed in accordance with the *Australian Standard 4282:2019 Control of the obtrusive effects of outdoor lighting*. The one major lighting element that is currently unknown is the large stadium naming signage. The City is generally supportive of the size of the signage due to its relevance of the scale to the stadium and its likely proposed integration into the design. However, the potential impact from the illumination of this signage needs to be appropriately assessed.

8.7 Wind effects

Council acknowledges the concerns raised by the Panel and welcomes the continued

development of the precinct plan and detailed ground plane designs to facilitate a comprehensive understanding of potential wind impacts. Council would like to further note that the site is inherently subject to wind exposure, which is a characteristic feature of the area and presents challenges in terms of effective mitigation, particularly across concourse and gathering spaces. Given this challenge, the City is mindful of placing too much emphasis on mitigation at the expense of effective crowd management particularly for larger capacity events (over 23,000 people events) where large, flexible gathering spaces are a requirement of functionality.

9.0 Construction program and sequencing

The City shares the Panel's concerns regarding the lack of detail regarding construction programming and dependencies between related projects and the construction of the stadium occurring simultaneously. Traffic network impacts will need to be carefully managed as well as the impact on local residents and affected businesses.

The City expects highly detailed approval conditions regarding construction management to be established for the Project and welcomes further dialogue on this complex issue.

10.0 Ministerial Direction Matters

10.3 Consistency with the Mac Point Precinct Plan

(e) The City concurs with the Panel to some degree that the Project does not support or promote integrated urban renewal of the site (as set out in Section 3.0 Urban Design), however, with careful detailed design development, mitigation of some of the issues can be achieved.

(j) The City agrees with the Panel that in order to improve functionality and safety of the proposed stadium design, additional dedicated space around the stadium building should be sort. The City implores the proponent and TasPorts to consider adjusting the eastern stepped boundary (as shown on Figure 2 below) as a matter of priority to allow for the full realisation of the Complementary Integrated Mixed Use Zone and Antarctic Facilities Zone as originally envisaged which will also go some way to alleviate some of the many pinch points identified around the precinct.

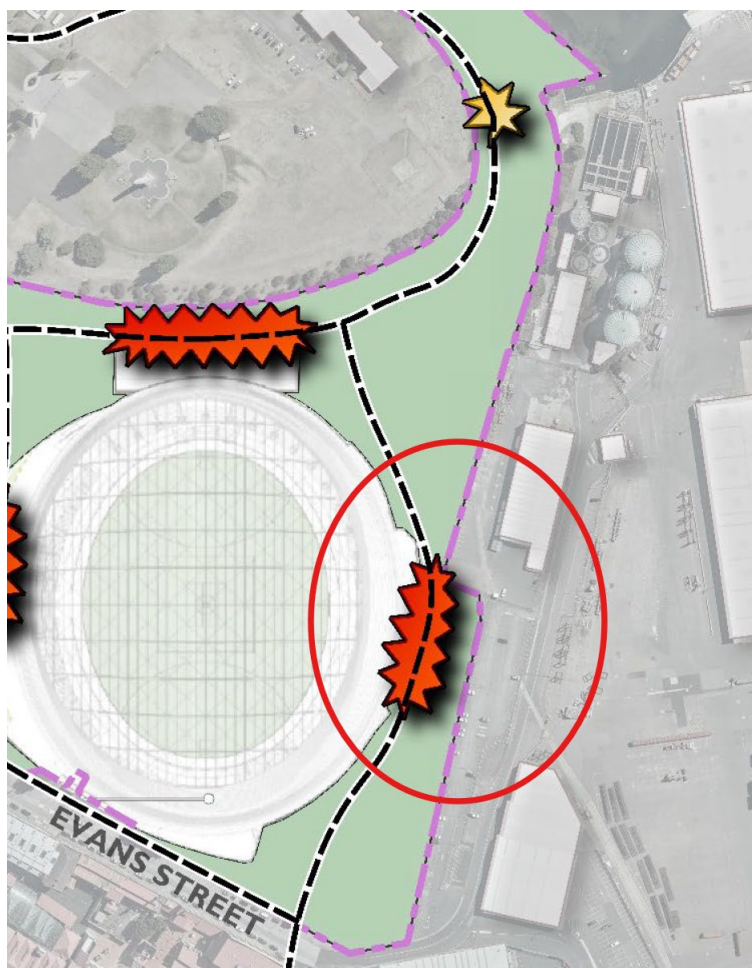


Figure 2. Stepped boundary issues between MPDC & TasPorts

11.0 Other issues

11.1 Conditions

The assessment of a proposal for planning permission must involve consideration of the specific conditions to be imposed on any permit which may be granted. The formulation of conditions is inextricably linked to the consideration of whether a permit should be granted. This fundamental proposition has support from both the Full Court of the Federal Court of Australia and the Full Court of the Supreme Court of Tasmania.

To date, we have only seen conditions drafted by the Applicant (Appendix 2.0 List of Proposed Conditions). We have concerns regarding the appropriateness of those conditions.

The City requests that the Panel specifies the conditions which may be appropriate to be imposed on a permit, if it is granted, as soon as possible so that the conditions can be considered as part of the Hearing process.

11.2 Subdivision

The area which sits over the Hobart Rivulet is of particular interest as the City owns title CT 1/176538 which is split into two parts on the western (NW) and eastern (NE) sides of the Cenotaph site. It is noted that the annexure sheets to the sealed plan of this title are annotated with height limits which repute to limit vertical boundaries, the NW part by 5.39m RL (AHD) and the NE part by 4.65m RL (AHD). This area also comprises two titles owned by MPDC (Part of CT 2/179192 and CT 4/179192). However, it is unclear from the proposed subdivision plan whether these two titles owned by MCDC are also proposed to include height limits to accommodate the height limits on the title owned by the City.

With regard to the statutory process followed for subdivision, when the City receives a development proposal across multiple titles in common ownership, conditions on a permit will require the titles to be adhered in accordance with section 110 of the *Local Government (Building and Miscellaneous Provisions) Act 1993*, prior to the issue of any building consent, building permit and/or plumbing permit or the commencement of works on site (whichever occurs first).

Conclusion

The City looks forward to discussing the issues raised in its submission in further detail to achieve an amenable outcome for the Project. Please feel free to reach out if any of the issues raised require clarification.

Council welcomes further opportunities to meet with the Panel and the Proponent to review our feedback and concerns. The significant investment in City infrastructure required to support the Project on an everyday basis and in 'event' mode will require careful planning and capital investment and will need to be factored into the delivery of the Project.

Given the compressed timelines for the Project, we request pedestrian connectivity, streetscape modifications, road network and parking facilities upgrades be given high priority to allow sufficient time to plan, request and allocate appropriate funding and resources at a state and local government level.

List of Appendixes

Appendix 1: Macquarie Point Stadium Economic Analysis Advice, SGS Economics & Planning

Appendix 2: Macquarie Point Stadium Economic Impact Assessment, AEC Group Report

Appendix 3: Landscape and Urban Form, Leigh Woolley

Appendix 4: Urban Design Advisory Panel Submission, UDAP

Appendix 5: Cultural Heritage Issues, MacKay Strategic

Appendix 6: Aboriginal Concepts Review, paliti rruni Island Spirit consultancy

Appendix 7: Movement Technical Review, GHD

Appendix 8: Noise and Vibration Technical Review, GHD