

Our Place - Hobart

Tasmanian Planning Commission
GPO Box 1691
Hobart 7001

20 December 2023

Email tpc@planning.tas.gov.au

Dear TPC,

Integrated Assessment for proposed Stadium at Macquarie Point

Thank you for the opportunity to comment on the guidelines. We offer this comment under protest due to the appallingly short and poorly timed consultation period imposed by the relevant Minister.

The attached detailed response will adopt the clause numbering in the draft guidelines.

We ask the Commission to note that a call for independence and transparency also forms part of our response. All reports to satisfy all requirements of this assessment should be required to be produced by independent practitioners, free from government influence. PwC (PricewaterhouseCoopers) ought be specifically excluded. Further, all should be required to be prepared in accordance with expert witness practice notes such as apply in the Supreme Court of Tasmania, the Federal Court of Australia and TASCAT. All assessments should be produced in a way that the practitioners are required to be independent and to do this work owing a duty to the Panel to be independent. Communications with the practitioners producing the reports should be required to be in writing and provided with the report. There is no shortage of examples of government influence on the production of reports and the preparation of materials for a project such as this. This is especially so where the State is the proponent, funder, and where the Government itself has a significant investment in the outcome of this assessment. See the Senate's current Finance and Public Administration Committee Inquiry into management and assurance of integrity by consulting services (Consulting services):

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/Consultingservices

Yours faithfully



Roland Browne
Spokesperson
Our Place - Hobart

Response to: **Draft Guidelines** – Macquarie Point Multipurpose Stadium Project of State Significance - December 2023

Part 1 – Introduction

- Re 1.0 Introduction (a) - under the Order, the project includes, amongst other things, corporate and community uses. There is no definition of the word “corporate” in the Order. By its very definition, a corporate body is a corporation. In this way, the Order requires an assessment of a use that is ill-defined and ambiguous. We can all understand the concepts of entertainment, sport, culture and community use. But use by a corporate entity, or a corporate use, cannot sensibly be assessed.

We understand that this requirement flows from the Order dated 16 October 2023 and the Commission is required to view the project as one which includes a concept of a corporate use. The Commission will need to give some meaning to the word in this context.

Part 11 – Guidelines

1.2 Site Description

- Under clause 1.2.1, Aboriginal heritage features ought be considered under “Features and Context”.

1.3 Proposed Use and Development

- At clause 1.3.1, under *Development*, the guidelines ought require the plans to consider and detail the relationship of buildings that comprise the project to buildings in Evans Street.
- At clause 1.3.1, under *Development*, the required 3D digital rendering of the project should be required to include renders from Mures at Constitution Dock, the GPO in Macquarie Street, Mawson’s Hut, the Cenotaph, the Remembrance Bridge and from the northern side of Princes Wharf.

1.4 Design and Management Response

- Under clause 1.4.3, details and plans should include examples of how a roofed stadium of this size has been successfully integrated into a colonial riverside city elsewhere in the world.
- Under clause 1.4.3, the last dot point on page 4 makes reference to the form, style and buildings and materials of the adjacent area. The definition of “adjacent area” is inadequate. What is land that is near to, including adjoining, the project site?

This definition needs to be clarified so as to include the University’s Domain Campus, lower Collins Street, Sullivans Cove, the area of Regatta Point, and that part of Soldier’s Walk on the Queens Domain that is on the northern side of the Aquatic Centre and Davies Avenue.

The above is significant because the Cenotaph should not be considered on its own as it relates to Macquarie Point and the proposed stadium. The Cenotaph is joined to the Soldiers Walk through the Remembrance Bridge. Moreover, the University of Tasmania is making considerable efforts to landscape the Domain Campus in consultation with Aboriginal people. Part of that consultation has brought to light the relationship of the Domain Campus area with areas such as Macquarie Point.

2.2 Governmental policy and strategy

- Re 2.2.1 (3) – plans and strategies “related to the role of the City of Hobart” include issues of traffic and traffic congestion, transport, and parking. These are not matters only for the City of Hobart. These are also matters for the State Government which also has a responsibility for transport and provision of public transport systems. An additional section should be added to encompass such plans and strategies “related to the very significant role of the State Government”.
- At the conclusion of 2.2.1(3) should be added “integration with the Domain, the Soldiers Walk and the Doone Kennedy Hobart Aquatic Centre”.

3.0 Economic development and social, cultural and community wellbeing

- Re 3.1 Cost-Benefit Analysis - the CBA is to include the loss of Macquarie Point as public land and is to identify the value of that loss.
- Re 3.3 Financial Impact Report - the sensitivity analysis of the FIR should also include identification of a range of cost escalation scenarios. It should also be required to make its assessment in light of the recent Infrastructure Australia report identifying and predicting the shortage of labour and materials to enable Australia’s infrastructure program to be rolled out.
- Re 3.4 Social and Cultural Analysis Report - the first dot point should also refer to events and programs across Tasmania.
- Re 3.4 Social and Cultural Analysis Report - the second dot point should be deleted as it puts the Commission at risk of public perception that it endorses the AFL’s position that Tasmania cannot have state teams without a new stadium.
- Re 3.4 Social and Cultural Analysis Report - these reports should also be required to provide information on the impacts on Blundstone Arena (Bellerive Oval), UTAS Stadium (York Park) and other event locations that would flow from this project being approved.
- Re 3.4 Social and Cultural Analysis Report - a further reporting requirement should be the effect of the loss of Aboriginal truth telling and recognition as a potential use of the site if the proposed stadium is constructed.
- Under clause 3.5, there should be a requirement that all assumptions upon which all forecasts are based are to be explained and justified.

4.1 Landscape and visual values

- At clause 4.1.3, eighth dot point, third circle point should commence “as outlined in”.

- At clause 4.1.4, the fourth dot point should include after the words “may be affected” the following: “particularly from Mures and Mawson’s Hut”.

4.2 Urban form of Sullivans Cove

- At clause 4.2.3, the third dot point should read “... project complement or detract from existing forms and reinforce and contribute to (or undermine) spatial patterns of the Cove”.
- Clause 4.2.3 should also require that the reports consider the impact on Evans Street residential areas.
- At clause 4.2.5, second dot point, the photo montages should be required to include photo montages from Mures, Mawson’s Hut, the GPO and other identified places around Sullivans Cove, the Cenotaph and Regatta Point.

5.3 Places and precincts of historic cultural heritage significance.

- Under clause 5.3.3, should be included the Domain Campus.

6.0 Movement

- This Section should also require consideration of an acceptable outcome for the people of Hobart as users of the road network, and not just stadium users and what is described as a broader transport/movement network.

6.2 Traffic, freight and transport routes

- At clause 6.2.3, the fifth dot point should also refer to Hobart residents.

6.3 Access: mass/public transport, car use and parking

- At clause 6.3.1, second dot point, after the words “in the broader area” should include “including the CBD, Glebe, Queens Domain, North Hobart and Sullivans Cove ...”.
- Clause 6.3.3 should require specific consideration to be given to establishing an adequate public transport system in Hobart.

6.4 Pedestrian/cycling movement

- Clause 6.4.3, dot point 1 should not be confined to major arterial roads in the area. It should deal with traffic flow for all roads in the area and adjacent areas during periods of high pedestrian usage. This should include the Tasman Bridge.

7.0 Activity and Land Use

- Under clause 7.0.2, the report should be required to assess how a stadium on this site integrates with Hobart traffic management planning over the life of the stadium.
- Under clause 7.0.3, there should be a requirement for consideration of impact on Glebe, Evans Street and lower Collins Street residential areas.

8.4 Noise and vibration

- Under clause 8.4.1, eleventh dot point, the proximity of current, proposed or potential noise sensitive land uses should be specified to include residential areas in Evans Street, Glebe and lower Collins Street.
- At clause 8.4.3, the potential for emissions to cause nuisance should not be “discussed”, it should be assessed.
- Under clause 8.4.4, there should be a requirement that the reports address the prospect of financial penalties for exceeding noise limits.

8.6 Solid waste and hazardous material management

- Clause 8.6.1 should have the words “encountered or” after the words “solid waste is likely to be”.

9.2 Construction Management

- At clause 9.2.3, the reports are to outline strategies that address significant effects and look at significant adverse effects. The reports should be required not to simply address the effects of construction, but should address the manner that avoids all adverse effects to surrounding land uses and infrastructure, and not just significant adverse effects. All these effects should be assessed in the reports, and it is up to the Commission to decide what effects are significant. In reality, numerous “non-significant” effects can be generated that on their own would not be significant, but in combination would be.