



JOHN WADSLEY Planning and Heritage Consultancy

Planning Heritage Research Consultation

8 January 2024

Mr John Ramsay
Executive Commissioner
Tasmanian Planning Commission
GPO Box 1691
Hobart TAS 7001

By email: tpc@planning.tas.gov.au

Dear Mr Ramsay,

As a heritage consultant and local historian, I have always sought to take an active role in ensuring that inappropriate development does not adversely impact on Hobart and its significant heritage places.

In that regard, I feel I must make a submission on the proposed stadium project and the assessment process for this project. I am very concerned that a stadium of the scale and bulk being envisaged will potentially have a significant adverse impact on the Cenotaph precinct, and by extension, the Queens Domain. It may well have an adverse impact on other heritage places adjacent to, and in the vicinity of the proposed stadium, including the important historic cultural landscapes that make up the port and city of Hobart.

Firstly, I must state that the timing and timeframe seeking public comments on these draft guidelines has been very inappropriate. Over my career, I have undertaken many consultation processes for government and private projects, and I would never allow a consultation period to be held over Christmas-New Year. Proper planning practice should always seek to maximise public involvement during an appropriate consultation period. At the very least there should have been eight weeks for submissions.

The Integrated Assessment for this project must be produced and delivered in a proper, transparent and independent manner. This includes all reports and investigations and communications that are prepared for this assessment must be produced by appropriately qualified and experienced independent practitioners, free from government, proponent or Tasmanian State Service influence.

Please contact me if you require clarification or further information.

Yours sincerely,

John Wadsley BA Hons M. ICOMOS MPIA

Response to the Draft Guidelines for the Integrated Assessment of the Macquarie Point Multipurpose Stadium Project of State Significance (as issued by the TPC in December 2023)

Part I – Introduction

1.0 Introduction - The proponent is stated to be the Crown; surely there should be a more specific identification of the agency/organisation that has responsibility for the project, so that the public can clearly identify the proponent, and so that the proponent publishes clear lines of communication for the public.

Part II – Guidelines

1.1 Proposal - The project proposal must include a discussion and reasoning of the assessment of all alternative sites (including sites not considered) and why this location was chosen, including a ranking of all sites and how they were assessed against each other.

1.2 Site Description - Historic cultural heritage places and values, and Aboriginal cultural heritage places and values (as well as archaeological sites) must be included and considered under “Features and Context”

1.3 Proposed Use and Development - The 3D digital rendering of the project must include renders from Constitution Dock, Mawson’s Hut, Elizabeth St/Davey intersection, Princes Wharf, the Hobart GPO, the Cenotaph, the Bridge of Remembrance, Soldiers Memorial Avenue and from key vantage points on the Eastern Shore, including Rosny Hill, Victoria Esplanade and Kangaroo Bay.

1.4 Design and Management Response – This section should include a requirement for a comparative analysis of similar sized projects around Australia and even globally including how those projects responded to adjacent heritage places and cultural landscapes.

Under Clause 1.4.2, a better definition of “adjacent area” needs to be made. Given the bulk and height of the proposed stadium, the distance of 200m (as referenced in Clause 5.3.3) is considered totally inadequate. This should be increased to 400m. The Queens Domain is linked to the Cenotaph precinct, so impacts on the Cenotaph will also have an impact on the Domain.

3.4 Social and Cultural Analysis Report – this section should specifically mention potential impacts on the Soldiers Memorial Avenue (not only the Cenotaph) from the perspective of commemoration and the community’s connection to and use of war memorials.

4.1 Landscape and visual values – “the spatial characteristics of the broader area” must specifically mention the Queens Domain and the Eastern Shore of the River Derwent. The term amphitheatre in the Glossary includes the Domain.

4.2 Urban form of Sullivans Cove – Clause 4.2.2. must include plans for the Domain/Cenotaph precinct as well as those for Macquarie Point. Clause 4.2.3 must specifically mention the need to address potential adverse impacts as well as potential contributions

5.3 Places and precincts of historic cultural heritage significance – Clause 5.3.1 must reference historic cultural heritage values, as well as characteristics and significance. It must also include the cultural landscapes and vistas as elements to be described.

Clause 5.3.2. must be more explicit in requiring that all adverse impacts and effects of the proposed stadium be clearly identified, described and quantified.

Clause 5.3.3 must be amended to include all places and precincts of historic cultural heritage significance as well as cultural landscape precincts and local historic landscape precincts within 400m of the title boundaries of the project site. . Given the bulk and height of the proposed stadium, the distance of 200m is considered totally inadequate. Also, there needs to be clarification of what “relevant to the site in relation to the Derwent River” means.

I note that the Tasmanian Heritage Council (THC) submission identified the following heritage places within and adjacent to the Macquarie Point Precinct plan:

1. Royal Engineers building and stone Post (THR ID 2280)
2. Former HMAS Huon Naval Depot (Huon Quays) (THR ID 2932)
3. Hunter, Evans, Davey Street - Subsurface remains (THR ID 10350)
4. Cenotaph, Anzac Parade and Queen’s Battery (THR ID 7137)
5. UTAS Centre for Arts (THR ID 2397)
6. Henry Jones & Co. IXL Jam Factory (THR ID 11961)
7. Zero Davey Archaeological Site (THR ID 5887)

I believe the THC omitted the following heritage places which may be impacted by the proposed stadium. Potential adverse impacts on these sites must be considered as part of the assessment process:

- Soldiers Memorial Ave, Boer War Memorial, and 2/40th Infantry Bn monument (THR ID 11987)
- Domain House (THR ID 2077) and Waterworth Building (THR ID 5869)
- Former Hobart Railway Station (THR ID 2187)
- Victoria Dock and Constitution Dock (THR ID 12022)
- Roberts & Co. Woolstore Complex (THR ID 2425)
- Hobart Gas Works complex (THR ID 2464)
- Tasmanian Museum and Art Gallery Complex (THR ID 6648)

Clause 5.3.4 must be amended to require that heritage impact assessments for the proposed stadium address the following documents, not merely “informed by”:

- The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance (2013) and Australia ICOMOS Practice Notes
- Tasmanian Heritage Council, Works Guidelines for Historic Heritage Places (2015),
- Tasmanian Heritage Council, Practice Note 1B Preparation of Heritage Impact Statements (2023)
- Queens Domain Cultural Heritage Management Plan (2002)

The definition of ‘historic cultural heritage significance’ under the Draft Guidelines Glossary must be amended to align with the definition under section 16 of the *Historic Cultural Heritage Act 1995*, in addition to consideration of local heritage values (see later).

I also support the Tasmanian Heritage Council submission seeking clarification as to how the heritage impact assessment will be integrated with the environmental, social, economic and community impacts assessment required by the Ministerial Direction, and what criteria the assessment will address.

6.3 Access: mass/public transport, car use and parking – In Clause 6.3.1, discussion on managing the provision and use of car parking in the broader area to achieve transport outcomes must be a whole of city approach, as this project will impact the whole of Hobart's transport networks.

9.1 Signs – this section should not only address signage, but also lighting and the colours to be used on building facades, infrastructure, light towers ancillary structures, etc. and the impact of signs/colours on adjacent sites, especially the Cenotaph precinct and nearby heritage places.

9.2 Construction Management – this section needs to address the risks associated with construction activity (demolition, drilling, explosives, heavy vehicle movement etc.) on nearby heritage places, especially the Cenotaph and the many heritage buildings on Evans Street and Hunter Street.

Glossary:

'Adjacent area' - this definition must be clarified as to its extent

'Cenotaph' – this definition must be amended to specifically include the Soldiers Memorial Avenue; as mentioned previously the two sites are linked, but also two trees from the 1920s Avenue Extension still survive adjacent to the Cenotaph.

'Historic cultural heritage significance' – this definition must be amended to align with the definition under section 16 of the *Historic Cultural Heritage Act 1995*, criteria as noted below, in addition to consideration of local heritage values:

- (a) the place is important to the course or pattern of Tasmania's history;*
- (b) the place possesses uncommon or rare aspects of Tasmania's history;*
- (c) the place has the potential to yield information that will contribute to an understanding of Tasmania's history;*
- (d) the place is important in demonstrating the principal characteristics of a class of place in Tasmania's history;*
- (e) the place is important in demonstrating a high degree of creative or technical achievement;*
- (f) the place has a strong or special association with a particular community or cultural group for social or spiritual reasons;*
- (g) the place has a special association with the life or works of a person, or group of persons, of importance in Tasmania's history;*
- (h) the place is important in exhibiting particular aesthetic characteristics.*