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The Tasmanian Planning Commission
GPO Box 1691
Hobart TAS 7001

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

Re: Draft Guidelines for Macquarie Point Multipurpose Stadium, Project of State Significance

To whom it may concern,

The Tasmanian Chapter of the Australian Institute of Architects would like to thank you for the opportunity to comment on the development of Guidelines for the Macquarie Point Multipurpose Stadium as a Project of State Significance. This response has been prepared by working with our Policy and Advocacy team and integrated feedback from our Tasmanian Chapter members.

Overall Feedback

The Tasmanian Planning Commission has prepared a comprehensive set of draft guidelines. Our submission makes comment and recommendations about ways to strengthen the guidelines.

Process

Institute would like to comment on the timeframe provided to give feedback on the Draft Guidelines. Insufficient time has been provided for the Tasmanian and Hobart public, businesses and industry and community sectors to formulate a detailed response. This is, in part due to the timing of the submission response period over the Christmas/ Holiday and New Year period. There are a number of issues including site remediation works, project costs and funding, workforce procurement and site selection which would benefit from a more extended public consultation period.

Guidelines methodological approach and structure

There are five overall areas where the methodological approach and structure for the guidelines could be strengthened. These are:

1. Benchmarking outcomes
2. Risk
3. Feasibility
4. Cross-referencing between the sections
5. Design excellence

Benchmarking outcomes.

The Institute understands that the purpose of this document is to develop a list of guidelines that will be used to assess future tenders for proposals for the stadium, and associated works that align with the development of the Macquarie Point Precinct. While this document functions well as a planning instrument—and in this respect is very thorough—the Institute is concerned that this

unintentionally limits the potential for the project to achieve design excellence. This is because there are no minimum standards, performance criteria, or tangible settings that can be seen and identified as leading to, or proactively promoting 'good design', high-quality built outcomes and healthy cities. Examples include United Nations Sustainable Development Goals¹, and appropriate local or international standards including but not limited to

- the performance of the stadium in its site context for access, egress,
- performance of transport infrastructure,
- environment contamination,
- energy efficiency,
- embodied carbon,
- water recycling.
- overshadowing
- wind tunnelling
- construction waste management
- local content

Risk

The draft guidelines have contained limited direct references to risks focussing on:

- vehicular and pedestrian traffic congestion
- environmental hazards
- climate change impacts
- cost-benefit, economic impact and financial impact assessments
- local and regional traffic disturbance
- crashes associated with heavy vehicles
- risk of anti-social behaviour around the time of events
- adverse social and environmental effects during construction and operation

The draft guidelines would be strengthened by requiring risks identified in the reports to be considered through a standardised risk management approach such as the use of AS ISO 31000:2018 *Australian Standard Risk Management – Guidelines*. AS ISO 31000:2018 states that,

The purpose of risk management is the creation and protection of value. It improves performance, encourages innovation and supports the achievement of objectives.

The risk management process set out in AS ISO 31000 includes the steps of

- Defining the scope, context and risk criteria
- Conducting a risk assessment including risk identification, risk analysis and risk evaluation
- Risk treatment including selection of options and developing and implementing risk treatment plans

This process can be applied at strategic, operational programme or project levels.

There are many other risks associated with the project and its operation. The draft guidelines need to more explicitly name some of these risks. Examples of these include but are not limited to:

- supply chain during construction
- attracting and housing the construction workforce

¹ The former Commonwealth National Cities Performance Framework was retired by the previous federal government in late 2021.

- the apparently yet to be undertaken remediation works as “*the final key area to remediate is Audit Area 6 – in the south-west corner of the site (the old cold store site)*” where the stadium would be located²
- the impact of 104,000 *additional* interstate and international visitor days across 43 events per year³ on the significant undersupply of permanent accommodation in the Hobart housing market; continuing a trend of housing stock usage converting from permanent accommodation into short-stay accommodation.

Feasibility

Where risks are identified and the options for risk mitigations or the designing out of risks are proposed, then these need to be accompanied by feasibility predictions. We note, for example, in a 2007 report on the Macquarie Point site remediation⁴ that commenced in 1996 that it was stated under the heading of *Future Site Management Challenges*,

At the early establishment of the assessment and remedial program, there was a recognition and acceptance that some amount of remnant contamination would be associated with the Hobart site, as result of the past and future heavy industrial nature of site railway operations. There was also recognition that the historical, industrial nature of offsite activities meant a high likelihood of contamination sources beyond the boundaries of the site. Provided the Hobart site could be made safe for humans and the environment under an industrial setting, clean up of the site to a pristine level would be inappropriate, unachievable and possibly a misuse of Government funds. The investigation works also encountered evidence of significant offsite contamination sources hydraulically up gradient from the site, which would continue to pose a recontamination risk to the Hobart site from groundwater migration.

It is recognised that there has been further decontamination remediation in the years since and there have likely been technological advances in the ensuing 16 years. What this statement had highlighted in 2007 was the feasibility of returning the site to pristine conditions for a broad range of uses as against continued use of the site as an industrial setting.

All significant risks identified in reports should be accompanied by an appraisal of the feasibility of the risk mitigation option, including the anticipated projections of cost to be borne by the Tasmanian taxpayer.

Cross-referencing between the sections

Cross-referencing between sections of the guidelines would make the requirements for reports more apparent and provide for greater internal consistency of the guidelines as a whole.

As an example, under the heading of Section 4.0 *Landscape and Urban form*, subsection 4.1.3 scopes reports intended to address matters including historical character, historic cultural heritage and cultural significance of known Aboriginal heritage. Similarly, Section 5.0 *Cultural Heritage* repeats these requirements, but in far greater detail. It would lead to greater internal

² See “What remediation work remains”, which in the absence of maps on this page would appear to coincide with the proposed stadium site. Sourced from: <https://www.macpoint.com/remediation>.

³ MI Global Partners (2022) Hobart Stadium Capacity Optimisation Analysis. Final Report 29 August 2022. Sourced from: https://www.stategrowth.tas.gov.au/infrastructure/major_projects/Tasmanias_new_Arts_Entertainment_and_Sports_Precinct_Macquarie_Point_Hobart

⁴ Gauthier, R.L. (2007) Contamination Assessment and Remediation at the Hobart Tasmania Railyards. Paper delivered at AusRAIL PLUS 2007 conference 4-6 December 2007, Sydney Sourced from:
<https://railknowledgebank.com/Presto/content/Detail.aspx?q=KFBhcGVyLlRpdGxIOiDb250YW1pbmFOaW9uIGFzc2Vzc2IbnQgYW5kIHJlbWVkaWFOaW9uIGFOIHRoZSBib2JhcnQvGVGFzbWUwFwEgcmFpbHlhcmlRzKSk=&ctID=MTk4MTRjNDUtNWQ0Y3OOOTBmLTIiYWUtZWJmJ2U2OTEODZDY3&rID=NjYx&qcf=MTk4MTRjNDUtNWQ0Y3OOOTBmLTIiYWUtZWJmJ2U2OTEODZDY3&phHJIZO==&bckU2I=VHJlU2O==&>

consistency of the guidelines in Section 4.0 (and specifically 4.1.3) simply referenced that the reports addressed the requirements set out in Section 5.0

Design excellence

We recommend that the assessment of future proposals for a stadium needs to go beyond a 'tick the box' scenario that responds to the breadth of considerations that factor into a Project of State Significance. We strongly urge there to be further development of this document, or supporting documents, that will allow for a level of judgement to be provided as to whether design excellence, rather than just a suite of design requirements, is being met.

Ways to achieve this include having qualified professionals from architectural, urban, heritage, planning, and engineering backgrounds providing comment on the proposed project as part of the integrated assessment process, the development of a comprehensive design brief for future tenders, and expert oversight of the project's development by the Strategic Architectural and Urban Design Advisor for the Tasmanian Government.

These efforts should be accompanied by a high degree of transparency on the project's development regarding timelines, costs and site works. Moreover, future documents and reports on the stadium should place an equal emphasis on mitigating risks, as discussed above, as they do on the opportunities and positive impacts that a project of this scale can have on Hobart, and Tasmania as a whole.

Granular feedback

1.0 Proposal

The draft guidelines cite a range of planning instruments that acknowledge the objectives and / or outcomes of the *Sullivan's Cove Planning Scheme 1997*. In addition to these, reports which provide background information that support the selection of Macquarie Point as the preferred location for the stadium should be requested in *1.2 Site Description*. This includes prior feasibility studies previously conducted: the *Hobart Stadium Site Selection Process | 25th February 2022* prepared by MCS Management & Consulting and Philp Lighton Architects⁵, and the *Hobart Stadium Site Options Pre-Feasibility Study for Regatta Point and Macquarie Point Sites*, prepared for the Australian Football League and State Growth Tasmania 2022-08-05.⁶

Further reports that provide information on the history of the site – specifically the outcome of more recent site-remediation works to the Macquarie Point Site (commenced in 2015), and clarification as to whether the current soil conditions are fit for purpose for a large-scale urban development – should be included in this section.

2.0 Policy, strategy and legislative context

The Institute notes the comprehensive policy, strategy and legislative context that must inform the reports in relation to the project and its surroundings pursuant to the Resource Management and Planning System (RMPS) and the State Policies and Projects Act 1993. As the scheme for a stadium in this site does not adhere to the indicated uses in Macquarie Point Site Development Plan in Part F of the *Sullivan's Cove Planning Scheme 1997*, clarification is required around proposed amendments to the current planning scheme.

⁵ https://www.stategrowth.tas.gov.au/_data/assets/pdf_file/0019/412435/2_Hobart_Stadium_-_Site_Selection_Process_Report_-_MCS_Management_and_Consulting_in_conjunction_with_PhilpLighton_Architects.pdf

⁶ https://www.stategrowth.tas.gov.au/_data/assets/pdf_file/0018/412434/3_Pre-Feasibility_Study_for_Regatta_Point_and_Macquarie_Point_Sites_-_Aurecon.pdf

We note that under Section 19 of the State Policies and Projects Act 1993 (Effect of order declaring a project of State significance) subsection 19 (1) sets out as follows that,

- (1) Where an order under [section 18 \(2\)](#) declaring a project to be a project of State significance is made, the provisions of any Act, planning scheme or interim order –*
- (a) requiring the approval, consent or permission of any person in connection with any use or development to which the order relates; or*
- (b) empowering any body to grant or refuse its consent to any such use or development; or*
- (c) prohibiting any such use or development; or*
- (d) permitting any such use or development only upon specified terms or conditions; or*
- (e) regulating or permitting the regulation of any such use or development –*
- do not apply unless the order has been revoked.***

Therefore, while the draft guidelines require that reports are to provide and consider relevant objectives of and outcomes in various Acts, the Guidelines for Macquarie Point Multipurpose Stadium should specify that reports will indicate clearly where there will be departures from the any acts, schemes or plans pursuant to the exemptions powers under subsection 19(1) of the Act.

3.0 Economic development and social, cultural and community well-being

Sections on Cost-Benefit Analysis (CBA) and Economic Impact Assessment (EIA) would benefit from broader consideration of the kinds of procurement strategies to be explored for site construction, such as whether a local, interstate, or international workforce will be required.

In the section on Social and Cultural Analysis Report, which seeks to encapsulate cultural considerations, more detail on Indigenous culture is required. Moreover, cultural issues pertaining to Indigenous culture could be referenced and synthesised more thoroughly across the whole document.

Reports provided could also factor in the impacts of site and construction works and how this aligns with the broader timeframe to achieve completion of the stadium. Reports should also provide a greater focus on:

- how the negative effects of site construction works (i.e. sound, traffic) on neighbouring commercial and residential areas will be mitigated,
- the procurement strategy for construction materials and where they will be sourced from, and
- the provision of accommodation for construction workers that recognises Tasmania's on-going critical housing crisis.

As previously noted, the ongoing impact on housing demand and, therefore, homelessness risk, once the stadium is in operation with the predicted 104,000 additional annual interstate and international visitor days through 42 events per annum should be assessed and appropriate risk mitigation options should be proposed.

4.0 Landscape and Urban Form

This section of the report provides a thorough visual analysis of the impact of the built form on the wider Hobart area. Significant buildings that are adjacent to the build area are mentioned, such as the Cenotaph, and Hunter Street buildings. Alongside this, and taking in the current conditions and history of Sullivan's Cove, we recommend reports on the existing heritage infrastructure. One particularly important heritage matter that should be addressed is the Historic Rail Shed, and

reports should provide detail on how a design solution might respond to this building within existing heritage frameworks.⁷

5.0 Cultural Heritage

This section does mention internal Aboriginal Heritage groups in government. However, stakeholders should not be limited to Aboriginal Heritage Tasmania. Other groups outside of government need to be included, such as First Nations community organisations, groups and stakeholders. Reports should also include strategies undertaken to Design for Country and Care for Country.

6.0 Movement

Additional detail could be added here on end-of-trip facilities specifically for bike-parking, and more detail on the movement through the site when event logistics ‘bump-in and bump-out’ occurs for major events. More specificity is desirable on the varied user groups and demographics accessing the site – such as contractors, suppliers, event logistics staff, interstate tourists, local visitors, young, old, disabled persons etc – and what their different movement patterns and point-of-journey needs would be.

7.0 Activity and land use

This section contains sufficient detail. The Institute has no comment.

8.0 Environmental quality and hazards

The reports requested in this section relate to contaminated land and how it will be stored, collected, and disposed of. We are concerned about the current site conditions and how these will be managed in development of the stadium and its curtilage.

An appraisal need to be made of whether it is better to de-contaminate land on-site rather than moving contaminated soil and material elsewhere. We strongly urge a range of alternatives be explored through the reports, that mitigate further environmental damage on the site – due to the impact that highly contaminated material has on water, air, and soil quality of a space that is destined to be an active public precinct. The feasibility of these alternatives needs to be included in the reports.

The section on climate change was also relatively light in terms of addressing broader risks. Discussion is currently limited to rising sea levels, and does not address the impact the construction of new buildings has on emissions, the urban heat island effect, resourcing of materials, and whole-of-life cycle emissions. Moreover, the guidelines should require reports to address a range of measures that could be implemented to mitigate the effects of climate change at precinct level, as well as at a global level.

9.0 Other planning matters

This section focuses on signage as a means of wayfinding. The Institute recommends a broader scope to the issue of wayfinding, through urban design strategies that go beyond just signs. Lighting methods are also mentioned, and we recommend reports adopt Dark Sky appropriate lighting to mitigate the effects of light pollution.⁸

Summary

Thank you again for the opportunity to comment on this important document, which informs large-scale and long-lasting changes to Hobart’s architecture, city, and urban fabric. If you would like to

⁷ <https://www.abc.net.au/news/2023-07-07/goods-shed-in-way-of-afl-stadium/102566476> ;
<https://www.abc.net.au/news/2023-12-07/shed-poses-new-complication-for/103204086>

⁸ <https://darksky.org/what-we-do/darksky-approved/>

discuss any of the above points raised in further in detail, please do not hesitate to contact me via the contact details in the letterhead.

Kind regards,

A handwritten signature in cursive script, reading "Jennifer Nichols".

Jennifer Nichols

Executive Director, Tasmanian Chapter
Australian Institute of Architects

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 13,000 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to www.architecture.com.au.