Statement of Evidence

Reference: **Macquarie Point Multipurpose Stadium**

Project of State Significance

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Field of expertise: Urban design, landscape architecture

Filed on behalf of: **OUR PLACE - HOBART**

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Introduction

This review has been prepared by Barry Murphy of Murphy Landscape Consultancy in response to the visual impact analysis prepared by Mr Christopher Goss of Orbit Solutions. The documents reviewed include:

- Visual Amenity Statement of Evidence (24 June 2025);
- Landscape & Visual Impact Assessment (25 June 2025); and
- Visual Amenity Evidence (Photomontages) (24 June 2025)

1 Montages

1.1 Viewpoint selection

There are a number of key criteria for the selection of viewpoints in an LVIA. These include:

- viewpoints should represent the range of possible views experienced by different receptors (such as residents, road users, walkers, visitors etc.);
- locations with high visual sensitivity should be prioritized, (such as popular public viewpoints, historic and cultural heritage features);
- ensure the viewpoint has an unobstructed or only minimally obstructed view of the proposal;
- ensure viewpoints have a range distances from the site and direction of views toward it;
- include viewpoints along key public routes;
- capture the proposed development in its landscape context, including significant landscape features;
- viewpoints should be accessible to the public;
- allow for cumulative visual effects where other development exists.

With these criteria in mind, it seems that the extent of selected montage viewpoints continues the restricted extent of representations contained in the earlier SLR Consulting report of 30 August, 2024. There are no views from critical character-defining and/or high use areas such as:

- the north-western edge of Constitution Dock along Davey Street, a major pedestrian thoroughfare for locals and tourists alike. (Refer to the contrast in Hamish Saul's renders from Davey Street, just NE of the Campbell St intersection (Fig 11 in Tim Biles' Report 2) and the Argyle St corner);
- the actual "arrival point" to the city of Hobart along the Tasman Highway, just south of Liverpool Street where the higher ground provides a strong entry/arrival experience to Hobart but also affords a spectacular view of the stadium dwarfing the Royal Engineers Building. (Again, refer Hamish Saul's render from the Tasman Hwy just north of the Brooker Street intersection (Page 21, Tim Biles' Report 2));
- the highly trafficked Mona Ferry departure point.

Broadly, the view selection is not adequately representative:

- KOP 03 – presents a view from the headland from **behind** the Cenotaph;
- KOP 07 –places vegetation that **blocks** the view of the stadium;
- KOP 10 – has a shrouded boat in foreground whose rigging **obscures** the dome outline and reduces contrast;
- KOP 11 – is so close to the Henry Jones building that the perspective view of the mass of the stadium is **substantially blocked** by the immediate foreground buildings. (See Hamish Saul's montage from further back for contrast.)
- KOP 13 – taken from roundabout location that is **extremely difficult to access** and view the stadium;
- KOP 14 – taken from the **wrong side of the road**, in the location of traffic moving away from the stadium;
- KOP 16 – prepared with stadium off centre of view cone, subtly diminishing visual impact and obscuring the discordance with the Royal Engineers Building by not showing the whole heritage building and allowing perception of that heritage building's true relationship with the stadium.

Additionally, while just happenstance, the montages in which a large cruise ship is in dock subtly diminish the impacts of the stadium by adding an ephemeral large scale element that does not represent the dominant condition. For example, the "before and after" contrast of the KOP 03 viewpoint is diminished by the comparison of ship to stadium – the extent of change is diminished, as shown below:

KOP 03 - HOBART CENTOPATH

KOP 03 - HOBART CENTOPATH

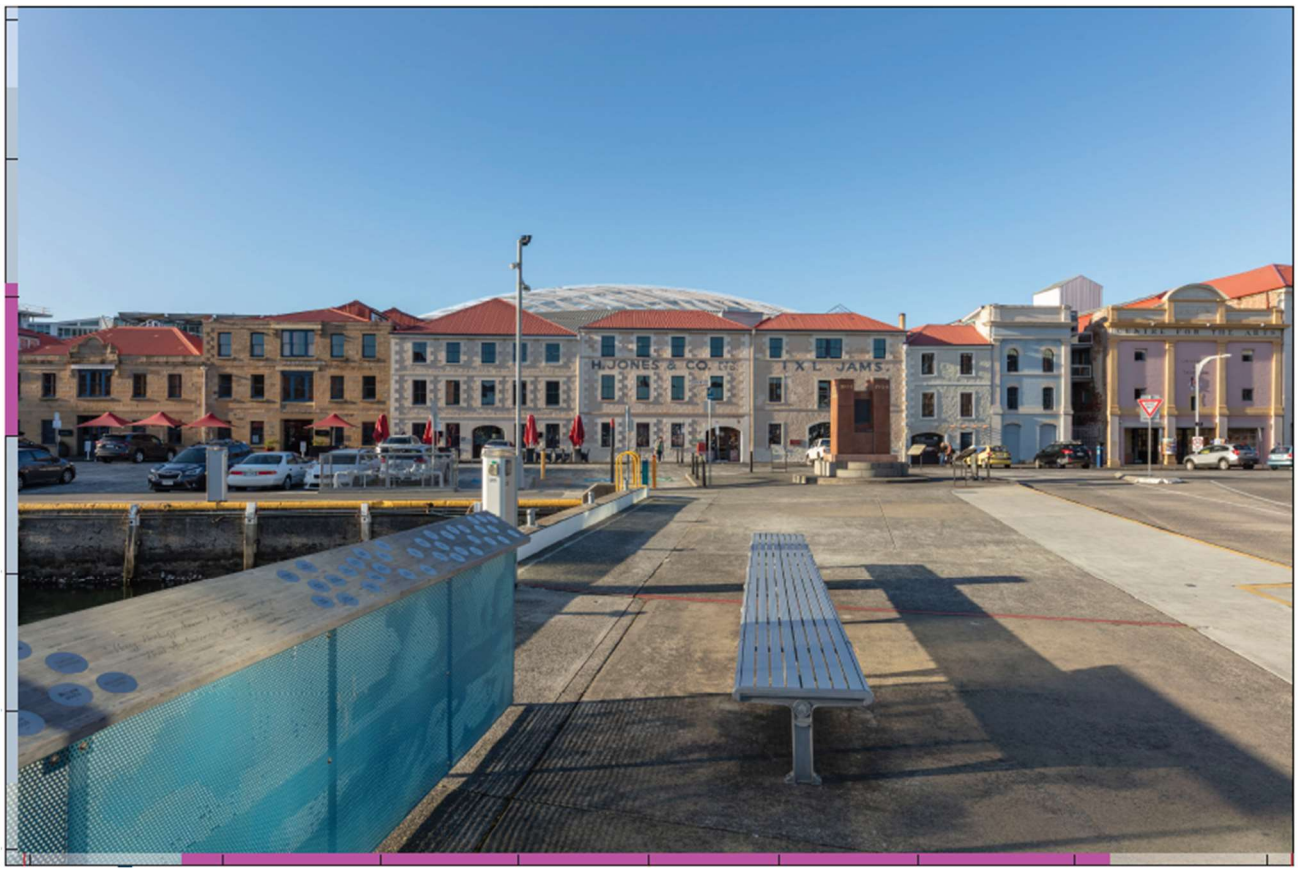
In contrast, the montage from Viewpoint 3 of the SLR Consulting LVIA provides a more realistic perception of views from the Cenotaph, i.e. the **actual** location and side of the Cenotaph that people would go to in order to take in the views from the headland.

This is shown below:

KOP 07 - Viewpoint chosen has vegetation occluding site view – why was camera not moved a foot left or right?
(135mm focal length at 4.90 kms from site)

KOP 08 – viewpoint selection locates a sign in the vista that occludes a substantial portion of the stadium elevation, as well as the zero reflectivity roof blending into the hills and skyline beyond.
(20mm lens at 0.88kms from site)

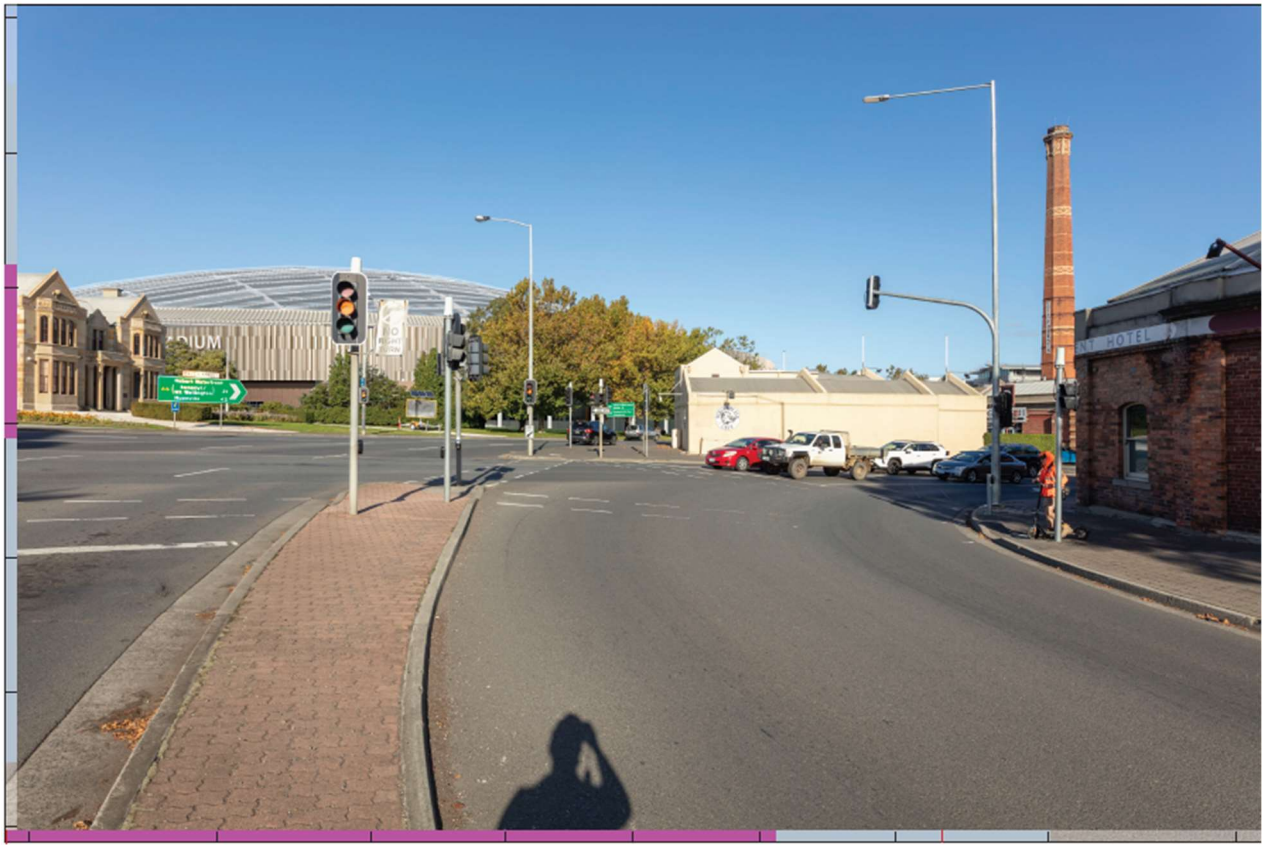
KOP 10 – The grey shrouded foreground boat and its rigging diminish the visual impact of the stadium by reducing the contrast that the foreground water would create as well as the rigging obscuring the outline of the dome.
(20mm lens at 0.49 km from site.)



KOP 11 – viewpoint chosen results in the Henry Jones building blocking most of the view of the stadium.
(20mm lens at 0.26 kms from site)

KOP 13 – viewpoint selected is from a difficult to access location in the Railway Roundabout and would essentially be seen out the back window of traffic driving AWAY from the stadium. It is unrealistic, seldom experienced and nonrepresentative.
(20mm lens at 0.50 kms from site.)

KOP 14 – viewpoint from traffic moving **away** from the stadium – unrealistic, unrepresentative view. It takes little imagination to understand the substantially increased visual impact of the stadium if this view had been taken either from the median or, more appropriately, from the right hand lane of traffic moving **toward** the stadium. (20mm lens at 0.87 kms from site.)



KOP 16 – stadium placed off centre to view, diminishing its visual impact and not representing the impact on the Royal Engineers Building.
(20mm lens at 0.25 kms from site.)

Some of the "missing" and alternative views that would provide a more complete assessment of the visual impact are represented in the montages prepared by Hamish Saul, shown below:

Tasman Highway – the "entrance" to city of Hobart.

High pedestrian use area of Davey Street.

The high pedestrian use area of Brooke Street Pier and Mona Ferry point.

High pedestrian area of Elizabeth Street pier, in contrast to KOP 11 where the H. Jones buildings do not obscure the stadium.

Highly perceived view by both motorists and pedestrians from road approach to Mawson Place (just metres south of KOP 10, providing a significantly different visual experience.)

A view toward stadium (from west of KOP 10) without distracting shrouded boat in foreground – a different visual experience.

These views provide a clearer picture of the impact of the stadium from some of the more highly used areas of Hobart's waterfront.

The image below is an extract of KOP 02 from the Bridge of Remembrance. The photograph was taken on Remembrance Day 2024 and shows the crowd of people gathering to remember the fallen. The existence of the stadium would significantly change the experience of the service and their visual connection to Hobart and the Derwent. The image also shows a section of stadium roof omitted from visualisation.

1.2 Roof rendition

The actual rendition of the building plays down its impact as follows:

1 The ETFE roof is rendered as having no reflectivity. The marketing image for the material below, shows that this is unlikely to be the case:

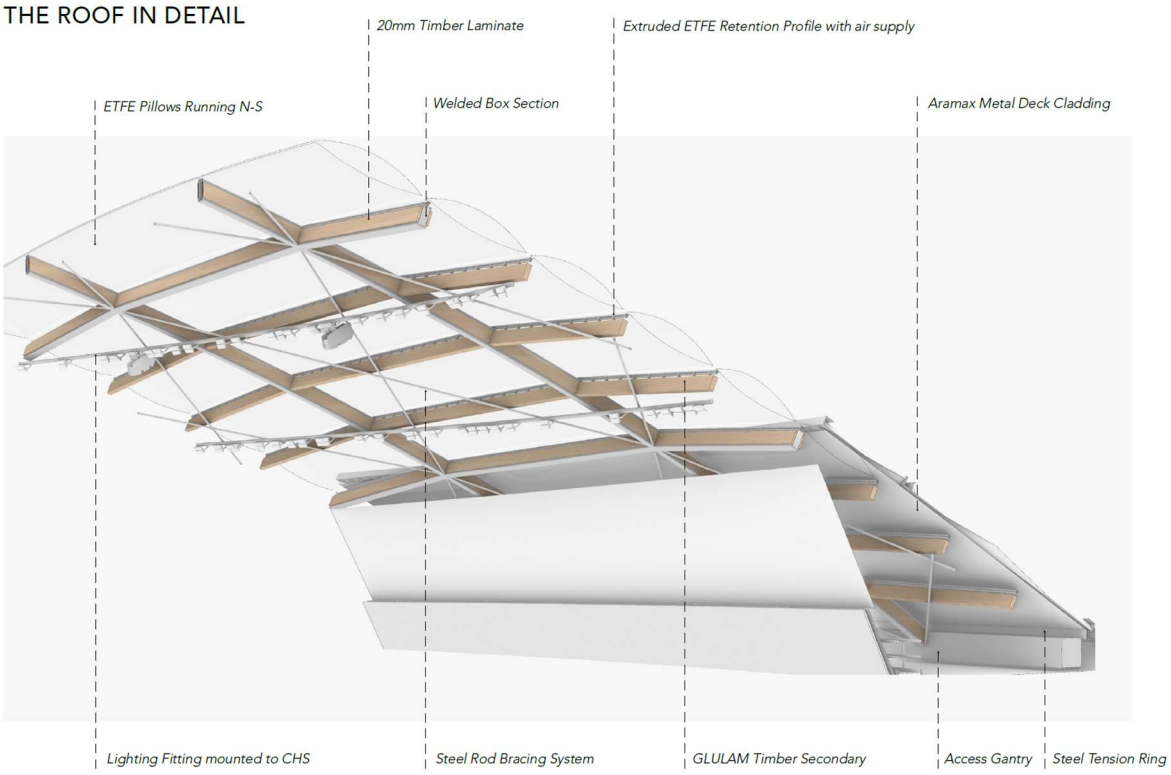
(Source: https://fabritecture.com/projects/oran-park-etfe-library/)

Note also that the shape of the ETFE "pillows" means there are multiple points of reflectivity across the roof, covering more reflective extent than a flat surface would. This will increase the visual impact from ALL viewpoints presented, but particularly the elevated ones and those with a naturally darker backdrop in:

- KOP 01 – from Tasman Bridge west end
- KOP 04 – from Rosny Hill lookout
- KOP 05 – from Rosny Hill coastal reserve
- KOP 07 – from Mount Nelson lookout
- KOP 08 – from Battery Point headland
- KOP 12 – from Mount Stuart lookout

2 the ETFE roof is rendered as transparent rather than translucent, diminishing the degree of visual impact by depicting the background colour and texture as showing through the roof. The translucent panels in the marketing image above suggest that that is not the case. See KOP 03 below:

3 the structure of the roof does not depict sports lighting paraphernalia shown in the architectural drawings nor any stadium PA system. Additionally, the roof structure depicted in the extracts of architectural reports below would seem to present a less transparent roof form than the one depicted in the Orbit montages.



The Roof in Detail from Stadium Design Description, August 2024 (p 34)

Cross sections through stadium (Stadium Design Description p 40 & 41).

With the above drawing being a section, the actual amount of roof structure in view from outside the stadium would be double what is depicted above. In contrast, the view from KOP 03 below implies quite a "see through" roof structure.

KOP 03 – roof is represented as transparent, equivalent to glass, not "translucent". Note Mt Nelson ridgeline through dome beyond, and in this view, effectively through 4 layers of the roofing material as well as the structural elements.
(20mm lens at 0.24 kms from site.)

KOP 04 – ETFE roof depicted with no reflectivity.
(50mm lens at 2.04 kms from site)

KOP 05 - ETFE roof depicted with no reflectivity. (Same for KOP 01 & KOP 02)
(50mm lens at 1.84 kms to site.)

KOP 12 – ETFE roof depicted with no reflectivity.
(100mm focal length at 8.85 kms to site)

1.3 Effect of underlying photograph's focal length

There is little definitive guidance on an absolute focal length to adopt in an LVIA. Neverless, it is clear that focal length affects the ability of a photograph to at least mimic what the eye sees (or more accurately, the model in our brain that that eye informs.) Long telephoto lenses foreshorten views, while wide angle or "fish eye" lenses push the foreground back.

The SLR Consulting report of 30 August, 2024 notes that:
The 50mm lens is an industry standard for LVIA photography as it is considered to be the closest representation of the human field of view and is widely accepted as the standard focal length when providing expert evidence in court. (Page 25.)

Most of the middle distance montages presented in the Orbit report have been taken at 20mm focal length. The impact of the difference between that and a 50mm focal length can be seen in the two very similar montages below:

KOP 10 – from within Mawson Place with 20mm lens

Montage from Morrison Street, approximately 25m SW of KOP 10's location, with a 50mm lens.

The use of the 20mm focal length for the majority of the montages subtly diminishes the visual impact of the stadium in each view.

2 LVIA objectivity

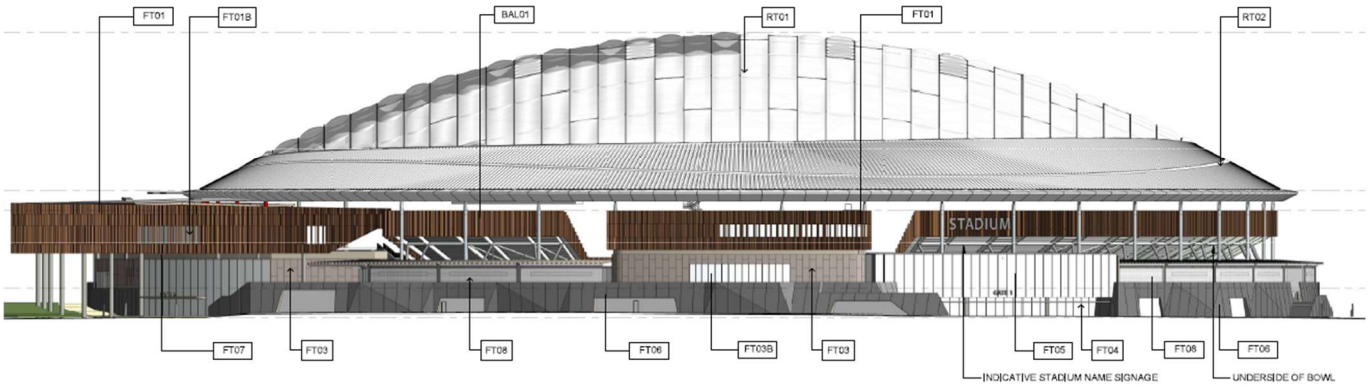
Facets of the LVIA are written in quite subjective language and quite different to an objective visual impact assessment. Some examples of inherently subjective language (under *5.4 Analysis of Critical Visual Influences*) include (with my emphasis):
P172 - *The palette grounds the structure in earthy browns and rich, warm bronzes, anchoring it to the natural and historic textures of the* ***Port Melbourne*** *foreshore*. (This is reference is repeated in 5.6.3 on P244 under Proposed Built Form.)
The design employs a ***considered gradient*** *of values…..*
This ***thoughtful distribution*** *visually reduces the perceived bulk……*
The building's colours are ***meticulously arranged…..***
P175 - *The proposed landscape design surrounding the stadium in Hobart strategically employs an indigenous Tasmanian native palette,* ***creating profound visual resonance*** *and robust integration with……*
P176 – *ensures the landscape* ***gracefully absorbs*** *Hobart's unique light, contributing to a* ***serene****, non-glaring visual environment*
This quiet reflectivity ***harmonises exquisitely*** *with the often-dramatic light of the Tasmanian sky*
P178 - *textural patterns have been* ***thoughtfully considered*** *….*
P182 - *Spaces within the landscape,* ***carefully crafted*** *at a human scale……*
P185 – *The proposed landscape design* ***masterfully deploys*** *a diverse range of plant sizes……*
The landscape design is ***meticulously crafted*** *to ensure …..*
P191 - *The stadium's overall silhouette has been* ***meticulously designed*** *to mediate between the rectilinear precision of urban civic architecture and the sweeping, organic forms of Hobart's natural backdrop.*

The language used is more like that of the proposing designers selling their concept, rather than that of an objective assessment of the visual impacts of the proposal – its outcome and assessment appears predetermined.

Other parts of the report adopt language that appears counter to both the architectural drawings and the photomontages. The Evans Street montage (KOP 06) describes the building as providing an "*activated built wall edge to Evans Street*" and having "*an airy, verdant embrace around the stadium*". (p176) Below is the relevant montage:

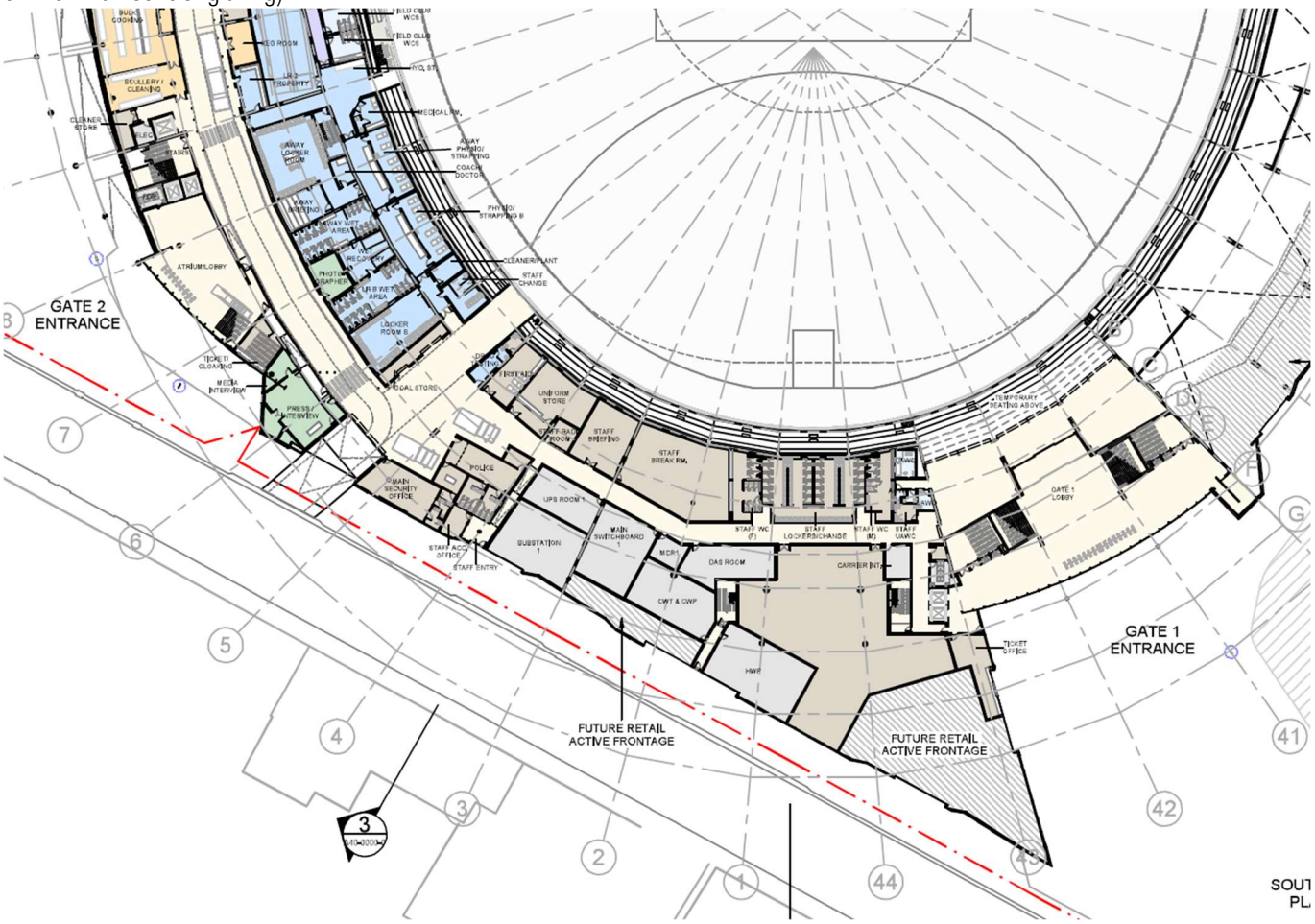
KOP 06 – the LVIA's "activated built wall edge to Evans Street". There is **extremely** limited "activation".

Below is the architectural elevation from Evans Street, confirming the extent of "activation" is minimal between the two Entries:



Evans Street Elevation

The plan view below confirms there is little to no "activation" on Evans Street, with two limited sections of "future retail" (with an unknown amount of glazing):



Part of architectural ground floor plan of the Evans Street edge to the building.

3 ETFE roof material

There is nothing in the architectural documentation nor the LVIA that clarifies precisely the degree of transparency/translucency of the roof material. The primary ETFE product is quite transparent but this brings with it significant concerns regarding patron comfort and potential air conditioning costs.

The roof is variously described as translucent (in the Orbit report Executive Summary P9 – Form/Shape) and "transparent" throughout much of the document:

- *Crucially, the ETFE roof, as a low-weight, highly transparent membrane*…(p173)
- *The ETFE transparent roof*…. (p175)

The proponent should provide a clear statement on what level of transparency/translucency is proposed (vis a vis the balance between patron comfort, turf growth and air conditioning load) as the selection significantly affects the potential reflectivity and colour appearance of the roof (and consequently its visual impact.)

4 "Objective" Analysis of Section 5

The highly complex analysis of the Magnitude of Change in Section 5 purports to use an objective methodology to "scientifically" determine the impact. The assessment of Magnitude of Change below rates the view from the eastern end of Brooker Avenue (KOP 16) as "moderate".

5.8.6 Landscape Character Zone 8: SULLIVAN COVE MIXED USE

	MAGNITUDE OF CHANGE OF PROPOSED BUILT FORM		
KEY OBSERVATION POINT	VISUAL SITUATION	DEGREE OF CONTRAST	RATING
KOP 08	MODERATE	LOW	MODERATE
KOP 09	MODERATE	LOW	MODERATE
KOP 10	MODERATE	LOW	MODERATE
KOP 15	MODERATE	LOW	MODERATE
KOP 16	MODERATE	LOW	MODERATE
MOC	MODERATE	LOW	MODERATE

It is hard to understand how the contrast between the before and after images below can be categorised as being a "moderate" magnitude of change:

Existing condition

Proposed building

5 Conclusion

While the LVIA and its associated montages provide some understanding of the visual impact of the proposed stadium on the city of Hobart and its character, it is limited to the point that severely compromises its usefulness as a tool to evaluate that impact. The relevant visual impact assessment documents:

- appear to be written from a subjective perspective of inherent support for the proposal;
- are limited in the extent of their presentation of visual impact through limited, obscured or seldom used viewing locations;
- avoid presentation of views from highly valued and important locations for Hobart, including its major entry from the north, its sacred Cenotaph headland and its highly used pedestrian areas along the waterfront which are a fundamental part of its existing highly valued character.

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