

21 December 2023

Tasmanian Planning Commission  
GPO Box 1691,  
Hobart TAS 7001  
Email: tpc@planning.tas.gov.au

**RE: Macquarie Point Multipurpose Stadium Project of State Significance Draft Guidelines**

Thank you for the opportunity to comment on the Draft Guidelines for the Macquarie Point Multipurpose Stadium Project of State Significance (POSS). The Tasmanian Heritage Council would like to provide the following feedback to assist the Commission in preparing guidelines.

Tasmanian Historic Cultural Heritage

In reviewing the draft Guidelines, we have also taken the *Mac Point Draft Precinct Plan (October 2023)* as reference material. The Tasmanian Heritage Council has identified the following heritage listed sites within and adjacent to the precinct plan:

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

Additionally, please note that Hobart Railway Goods Shed was nominated for entry into the Tasmanian Heritage Register. The Tasmanian Heritage Council considered the nomination in its meeting on 8 December 2023. Heritage Council's decision on this matter will not be published publicly until 10 January 2024.

The Ministerial Direction dated 16 October 2023 requires, as part of the integrated assessment, the Commission to consider matters provided for in the Mac Point Precinct Plan. Should the Goods Shed nomination proceed to a provisional listing on the Tasmanian Heritage Register, there will be the need to update the Mac Point Precinct Plan to reflect the heritage status of the Goods Shed in order for the proponent's reports to adequately address any heritage impacts on this significant heritage feature.

The Tasmanian Heritage Council also requests that:

1. section 5.3.4 of the Draft Guidelines be amended to require that heritage impact assessments also address the Tasmanian Heritage Council's [Works Guidelines](#), in addition to The Burra Charter, Tasmanian Heritage Council Practice Note 1B, and the Queens Domain Cultural Heritage Management Plan 2002;
2. the definition of 'historic cultural heritage significance' under Glossary 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.

### Effect of the Guidelines

The consultation letter has indicated that 'the draft guidelines detail the information that the proponent's submission reports are to contain, but are not criteria for the assessment of the proposal'. The Tasmanian Heritage Council seeks 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.

Section 3.0 under Part I of the draft Guidelines also states:

*The issues the draft guidelines (and the final guidelines) cover should not be taken as suggestive of the consideration or weighting that may be given to those issues in the Commission's integrated assessment.*

Given that the Commission will have overriding power within the assessment process, and that there are no appeal rights to the Commission's final recommendations under section 28 of the Act, it is suggested that section 3.0 of Part I of the draft Guidelines be revised to reflect reasonable degree of certainty and confidence as to what the integrated assessment process provides.

If you would like to discuss any of these matters raised in this representation in further detail, please contact Xin Guo, Planner / Heritage Adviser at Heritage Tasmania on 1300 850 332.

Yours sincerely



Brett Torossi  
**Chair**  
Tasmanian Heritage Council