

25 June 2025

Mr Paul Turner SC
Panel Chair of the Macquarie Point Multipurpose Stadium Panel
Tasmanian Planning Commission
GPO Box 169
HOBART TAS 7001

BY EMAIL: tpc@planning.tas.gov.au

Dear Mr Turner

Macquarie Point Multipurpose Stadium of State Significance

1. We continue to act for the Crown in the Right of Tasmania (**State**) in relation to the above matter.
2. We provide for filing the following:
 - (a) expert witness statement of Mr Christopher Goss (Orbit Solutions) in respect of visual impact and photomontages. This includes the following documents:
 - (i) a Landscape and Visual Impact Assessment;
 - (ii) a Visual Amenity Evidence Statement (Photomontages); and
 - (iii) a Statement of Evidence;
 - (b) Technical Note 1 which contains a response to the email from the Executive Commissioner to the State dated 12 June 2025 requesting updated costing information;
 - (c) correspondence between the State and Cricket Australia and Cricket Tasmania in respect of the Heads of Agreement; and
 - (d) in respect of the Northern Access Road:
 - (i) a letter from MinterEllison to the Department of State Growth seeking further information in relation to the current status of the design, approval, funding and delivery of the proposed Northern Access Road dated 24 February 2025; and
 - (ii) a letter from the Department of State Growth to MinterEllison in response dated 7 April 2025.
3. These documents can be accessed via the following link:
<https://share.minterellison.com/w/0vD0AYWs5LQckQFW9SajzouUmUNc959YA91wKkMpR2Sye>
4. The Commission will be taken to this material during the hearing.
5. Further, we refer to our letter to the Tasmanian Planning Commission dated 17 June 2025 (**Letter**), which provided an overview of the expert witnesses our client intends to call as part of the Public Hearing, and the expected timing for filing their expert evidence.
6. We confirm that the expert evidence of:
 - (a) Dr Neil Mackenzie (KBR), who will give expert evidence on noise and vibration issues, was filed with the Commission on 18 June 2025;

- (b) Jim Gard'ner (GJM Heritage), who will give expert evidence on heritage issues, was filed with the Commission on 18 June 2025;
 - (c) Graeme Steverson (WSP), who give expert evidence on transport matters, was filed with the Commission on 23 June 2025; and
 - (d) Chris Goss (Orbit Solutions), who will provide photomontages and give expert evidence on visual impacts, is filed with this letter.
7. Our Letter also noted that:
- (a) Neil Shephard (Neil Shephard & Associates) will give expert evidence on planning issues, and that his expert evidence was expected to be filed on or around 23 June 2025; and
 - (b) at the same time or shortly after filing the expert evidence of Mr Goss on or around 23 – 25 June 2025, it is possible that Mr Gard'ner and Mr Shephard may file addendum reports reflecting to the evidence of Mr Goss.
8. We consider it would be more efficient for the Commission and all parties to the hearing for Mr Shephard's expert evidence to be filed on or before 29 June 2025, so that Mr Shephard's evidence can be contained in a single document and can have the benefit of reviewing the expert statement of Mr Goss which is being filed with this letter.
9. We confirm that, consistent with our Letter, we may file an addendum report prepared by Mr Gard'ner, which will reflect any changes Mr Gard'ner's opinions contained in his expert report filed on 18 June 2025, which result from his review of the evidence of Mr Goss.
10. Finally, we confirm that presentations prepared by Cox Architects and Mr Kim Evans (Chair of the Macquarie Point Development Corporation) have been sent separately to the Commission for uploading onto the Commission's computer. These will be referred to during the presentation of our client's case.
11. Please contact us if you have any queries in relation to this letter.

Yours faithfully
MinterEllison

MinterEllison

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