

# Department of State Growth

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Mr John Ramsay  
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Tasmanian Planning Commission  
GPO Box 1691  
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Dear Mr Ramsay

## **Submission on the draft guidelines for the integrated assessment of the Macquarie Point Multipurpose Stadium**

Thank you for your letter of 4 December 2023 inviting comment on the draft Guidelines for the integrated assessment of the Macquarie Point Multipurpose Stadium Project.

In response, the Department of State Growth has worked with Tasmanian State Service agencies, including Macquarie Point Development Corporation and Stadiums Tasmania, to prepare a consolidated submission for the Commission's consideration. I understand that some agencies will also provide individual responses, including advice of nil comment. The following response is intended to represent a whole-of-government view.

The content of the main body of this submission is a summary of key points and themes. The contributions of agencies can be found in the table at **Appendix A**. The content of that table is detailed and includes specific suggestions organised according to the headings in the draft Guidelines. In some cases that level of detail might be more relevant to the assessment process rather than in the preparation of guidelines, but I hope that this content provides a useful indication to the Commission of the types of issues that the Tasmanian State Service anticipates being considered in the integrated assessment.

### *Sections 1 and 2 – Proposal & policy, strategy and legislative context*

The draft Guidelines lack a provision for the proponent to submit an overall assessment of the proposal's benefit against the integrated assessment's four elements. A clear statement should be added, allowing the proponent to make submissions demonstrating why the proposal should be approved based on a balanced assessment against the four pillars of the project of state significance (PoSS) assessment, as outlined in section 16(2) under the definition of 'integrated assessment.'

The Commission should consider ways to ensure that the draft Guidelines provide the clearest possible guidance to the proponent on what it will need to address in the reports to satisfy the relevant requirements. This might necessitate the inclusion of an objective statement for each section of the guidelines, indication of weighted importance of particular guidelines, and/or the numbering of lists to facilitate cross-referencing.

The PoSS process allows for various permits or authorities to be considered and issues addressed through a single process. The requirements in section 1.3 (*proposed use and development*) of the draft Guidelines are quite detailed and specific, and do not appear to allow the proponent sufficient flexibility in this regard. The section

may benefit from simplification and clarification, for example by specifying whether the usage reports should consider day-to-day operations of the stadium in addition to other events and activities.

Additionally, in section 1.3, consideration should be given to ensure the draft Guidelines do not seek detailed design information in excess of what is likely required to undertake an integrated planning assessment. For example, consideration should be given to seek *indicative* information rather than *detailed* or *full* descriptions and plans to provide flexibility in this regard.

In section 1.4, the reports to outline potential non-site related effects on people's social, economic and cultural wellbeing arising due to the project appear to be focused on negatives impacts only. The reports should also consider the positive impacts on people's social, economic and cultural wellbeing.

The Commission should also consider whether the requirements in sections 1.4 and 2 for the proponent to identify and address certain planning related provisions are consistent with the nature of the PoSS process, which is supposed to establish 'project specific guidelines' rather than demonstrating adherence to existing controls. For example, the assessment criteria for the Bridgewater Bridge Major Project focused on broader considerations, without specific references to planning scheme provisions.

### *Section 3 – Economic development and social, cultural and community wellbeing*

It is acknowledged that the Commission has included an intention not to limit the methodologies that may be used to assess the economic, social and cultural effects of the project in its guidelines. However, it is recommended that the economic evaluation be expanded to fully capture the benefits and costs that accrue to users if the project is implemented.

The guidelines should consider how the benefits and costs, to be estimated as part of the Cost-Benefit and Economic Impact assessments, are measured and valued in monetary terms. The guidelines should specifically include the principle that evaluation is based on user's willingness to pay for a good or service – that is the maximum price that an individual would be willing to pay for a good or service.

Under a willingness to pay (WTP) model, the core valuation principle is that goods, services, and non-market outcomes are valued at the dollar amounts that individuals or businesses are willing to pay for them. The preferences of individuals and businesses are the primary indicators for valuations and this model provides a way to capture intangible benefits. A WTP model provides valuable insights that can inform pricing strategies, product development, marketing efforts, and overall business decision-making, ultimately contributing to improved competitiveness and profitability.

Cost-benefit-analysis (CBA) valuations aim to estimate how much value people place on a given outcome relative to other outcomes. For non-market outcomes, CBA does this by estimating the dollar amounts that the relevant parties would be willing to pay for the outcome in a hypothetical world where it was for sale. While CBA and WTP models both involve the assessment of value, they differ in their scope, perspective, and the types of decisions for which they are most applicable. WTP models are more focused on customer preferences while CBA is a broader tool used in public policy and project evaluation.

While these valuations are not a precise science, they represent a consistent and highly adaptable methodology with sound theoretical underpinnings. We recommend that the Commission include a WTP approach to assess and capture the economic outcomes more fully in concert with the methodologies and assessments listed in section 3 of the draft Guidelines.

In section 3.2, it is noted that the modelling will show the direct and indirect/induced economic effects resulting from a number of indicators, including *employment*. Consistent with the Lauderdale Quay, Basslink and Oceanport PoSS guidelines, which all provided for an assessment of the *employment impacts*, it is recommended that the reference to *employment* should also be reasonably interpreted to include *employment impacts*.

In terms of the Economic Impact Assessment and the Financial Impact Report, the guidelines should be made clearer that it is not the role of the proponent to determine the financial impact on the Government nor is it consistent with precedents to-date.

Further, it is not clear why the Commission would specifically need to assess or evaluate the financial impact of government spending decisions. There are existing statutory and established internal to government and external public scrutiny processes and pathways to review government budget processes. The draft Guidelines should focus on the integrated assessment of the Project rather than the broader activity and mechanics of government, which appear to be out of scope, particularly noting there are existing direct mechanisms for these.

#### *Section 4 - Landscape and Urban form*

No comment.

#### *Section 5 – Cultural Heritage*

It is recommended that the Commission considers the imbalance in the draft Guidelines between the Aboriginal heritage considerations (section 5.2) and update terminology to be clear that 'historic' is used for European heritage and 'Aboriginal' for Aboriginal heritage, while 'cultural' is all types of heritage.

#### *Section 6 - Movement*

The Commission should consider whether an updated structure of section 6 could better assist the proponent in providing quality and relevant outputs. The draft assessment criteria could more clearly outline that the proponent will be required to address the current transport task and network (including the extent of the network to be assessed), expected transport task associated with the proposal (event and non-event daily site operations), clearly defined transport modelling scenarios, and required infrastructure, service and management responses.

Integration with the transport network, locally and across Greater Hobart, will be critical for the stadium and surrounding site development. The Commission should consider whether the stadium development and associated movement can be assessed in isolation of the wider precinct development at Macquarie Point. Consideration of local emergency services will be critical to ensure the continuity of those services is maintained and adverse impact minimised.

The report required under section 6.4 (*pedestrian/cycling movement*) should include consideration of appropriate facilities to enable safe and secure parking of bicycles and other active transit modes (such as an appropriate number of bike racks in well-lit, publicly accessible areas).

#### *Section 7 – Activity and land use*

Refer to Section 9 and Appendix A for comment.

#### *Section 8 – Environmental quality and hazards*

Environmental factors such as light, noise and water pollution can have impacts on fauna. The draft Guidelines requires the reports to address the effects of certain environmental factors in general terms (that is without specific mention of the impacts on fauna) and appear to be limited to the usage phase without considering the construction phase. The Government requests that the Commission consider whether the guidelines properly provide for full consideration of the potential impacts throughout the project.

The reports required under section 8.8 (*climate change*) should be based on the latest available climate projections data.

## *Section 9 – Other planning matters*

The draft Guidelines consider emergency management within the stadium. However, the Commission may wish to consider whether emergency management arrangements for emergencies that occur outside the Stadium should be considered as part of the assessment such as the potential to provide temporary safe spaces during an emergency event.

### *Other comments: current site interaction and benchmark*

Generally, the sections on movement, activity, land use, and environmental quality and hazards do not acknowledge that the current land uses at the Macquarie Point site and its surroundings currently interact with each other. The prescriptions within these sections may give the impression that the site and its surroundings are unaffected by current impacts from nearby entertainment venues, port activities, etcetera.

The benchmarks should consider the current land uses and activity levels, including those potentially accommodated by other uses and developments on the site. It is essential to assess the impacts of future site development for various uses, acknowledging that these developments will inevitably affect movement, activity, land use, and environmental quality and hazards. The assessment should not solely be against a 'no development' benchmark, recognising that alternative future development will have implications for the mentioned factors.

We look forward to continued involvement in the Project of State Significance process over the coming months.

Yours sincerely

Craig Limkin  
**Secretary**



8 January 2024

*This submission was prepared by the Department of State Growth in consultation with the following agencies:*

- Department of Premier and Cabinet
- Department of Natural Resources and Environment Tasmania
- Department of Police, Fire and Emergency Management
- Department of Health
- Department of Justice (nil comment)
- Department for Education, Communities and Young People (nil comment)
- Macquarie Point Development Corporation and Stadiums Tasmania (joint comment)

## APPENDIX A – Contributions according to sections in the draft Guidelines

Item	Comments by Tasmanian State Service
<b>1. Proposal</b>	
1.1 Description of and plans for the proposed project	<ul style="list-style-type: none"> <li>• <i>1.1.1. (paragraph 4)</i> - elsewhere in the document the phrase ‘including but not limited to’ is used; this could be applied here to ensure that the list of inclusions is not taken to be exhaustive.</li> <li>• <i>The Four Elements</i> – the draft Guidelines lack a provision for the proponent to submit an overall assessment of the proposal's benefit against the integrated assessment's four elements. <ul style="list-style-type: none"> <li>– A clear statement should be added, allowing proponents to make submissions demonstrating why the proposal should be approved based on a balanced assessment against the four pillars of the PoSS assessment, as outlined in s.16(2) under the definition of 'integrated assessment'; and</li> <li>– Currently, the Guidelines suggest a separate assessment of issues without guidance on integrating them into a holistic assessment.</li> </ul> </li> <li>• <i>Numbering of Guidelines and Cross-Referencing</i> <ul style="list-style-type: none"> <li>– It is suggested to number the Guidelines for improved cross-referencing in reports, facilitating a clearer connection between the Guidelines and their specific addresses.</li> </ul> </li> <li>• <i>Consistent Terminology</i> <ul style="list-style-type: none"> <li>– The Guidelines use terms like 'adjacent area', 'surrounding land', 'broader area,' and 'locality' to identify external elements. While these requirements are necessary, consistent terminology and more specific guidance on the external extent of what needs to be demonstrated would enhance clarity in understanding the project's impact.</li> </ul> </li> <li>• <i>Qualified People and Professional Judgment</i> <ul style="list-style-type: none"> <li>– While reports should be from suitably qualified individuals, the requirement for 'particular views' as attachments may not be practical, especially in matters involving professional judgment.</li> <li>– Planning assessments often rely on professional judgment, and separating reports on issues from consideration may not align with the nature of these assessments.</li> </ul> </li> <li>• <i>Inclusion of an Overall Objective for each of the Sections</i> <ul style="list-style-type: none"> <li>– Recommend including an overall objective for each section, rather than an exhaustive list of individual matters. For instance, the Design and Management response section (1.4) could start with an objective such as ‘To ensure that the proposal contributes positively to its context and demonstrates how it responds to the values, attributes, constraints, and opportunities of the site and surrounding area.’</li> <li>– Clear objectives would provide guidance to proponents on how to address specific matters in the Guidelines to meet the overall objective.</li> </ul> </li> <li>• <i>Section 3.0 is considered critical and offers valuable advice</i> <ul style="list-style-type: none"> <li>– The Guidelines are intentionally not rigid criteria for assessment, but there is a need for clarity on assessment criteria and how proponents are expected to address them.</li> </ul> </li> </ul>

Item	Comments by Tasmanian State Service
	<ul style="list-style-type: none"> <li>– Proponents would benefit from guidance on how to incorporate the Guidelines into their reports, including the option to indicate the weighted importance of specific guidelines.</li> <li>• <i>Clarity needed when drafting and finalising guidelines (note final paragraph in Section 3.0)</i> <ul style="list-style-type: none"> <li>– Concerns around the lack of formal Judicial Review, which could leave proponents uncertain about procedural fairness in unforeseen matters which its reports were not required to address.</li> <li>– The drafting process should provide more certainty to proponents regarding the matters they need to address, particularly when there are unexpected issues.</li> </ul> </li> </ul>
1.2 Site description	<ul style="list-style-type: none"> <li>• <i>Aboriginal Heritage</i> – it is recommended that Aboriginal heritage be included in the <i>Features and context</i> list. Also question whether ‘man-made’ hazards (such as contamination) be listed for inclusion in the site description requirements.</li> <li>• <i>Man-made Hazards</i> – it is recommended that man-made hazards (e.g., acts of violence, terrorism, crime) are included in addition to natural hazards.</li> <li>• <i>Sensitive Use Areas</i> – it is recommended that the site description should identify the location of the development relevant to sensitive use areas (residential properties, health care facilities) which may be impacted by the development.</li> </ul>
1.3 Proposed Use and Development	<ul style="list-style-type: none"> <li>• <i>Definition</i> – it is not clear from the description whether ‘events as well as other activities’ includes business as usual for the site. It would appear that ‘other activities’ might include day-to-day operations, but it should be made clear.</li> <li>• <i>Development (point 5)</i> – should this also include ‘details for the removal or relocation of any infrastructure’ as well as ‘utility services’?</li> <li>• <i>Development (point 8)</i> – should this include plans for disposal of any unwanted cut/fill material?</li> <li>• <i>Transport</i> – should points 1, 3 and 4 specify that they relate to both development and use phases (as is implied in point 2)?</li> <li>• <i>Transport</i> <ul style="list-style-type: none"> <li>– Plans of any new transport infrastructure to accommodate pedestrians, cyclists, vehicles, and mass/public transport services.</li> <li>– Plans of all changes to any existing transport infrastructure assets, including any works, structures and temporary/permanent changes in use, to accommodate non-project related transport/movement as well as pedestrians, cyclists, vehicles and mass/public transport services related to the project.</li> </ul> </li> <li>• The first two dot points cover the same issue – new and upgraded transport infrastructure and services associated with the proposal. Suggest the two points are combined as follows - <ul style="list-style-type: none"> <li>– Plans of any new or upgraded transport infrastructure and services, including any works, structures, new services and temporary/permanent changes in use, to support access and transport movements to and from the site, and maintain the efficiency, safety and accessibility of the adjacent transport network, for private cars, public transport, freight vehicles, pedestrian and cyclists.</li> </ul> </li> <li>• <i>Level of Detail for Planning Approval</i></li> </ul>

Item	Comments by Tasmanian State Service
	<ul style="list-style-type: none"> <li>– The Guidelines provide specific details for use and development that are seemly overly detailed for a planning approval process.</li> <li>– The PoSS process allows for various permits or authorities, and proponents should have the opportunity to specify the approvals they seek and identify those pursued through other permit processes.</li> <li>– Proponents should be able to indicate that the level of detail provided is sufficient for the specific permits sought. For instance, planning approvals typically focus on aspects like scale, materials, appearance, and finishes, rather than engineering or structural details.</li> <li>• <i>Engineering and Structural Details</i> <ul style="list-style-type: none"> <li>– Planning approvals generally do not require demonstration of engineering or structural details. Instead, the emphasis should be on providing clarity regarding scale, materials, appearance, and finishes. This approach ensures that construction aligns with the parameters set by the planning permit.</li> </ul> </li> <li>• <i>Description of Uses and Activities</i> <ul style="list-style-type: none"> <li>– The Guidelines request ‘a full description of all uses and activities associated with the proposed project, including the proposed hours of operation’ (1.3.1). For projects like convention centres, it is not feasible to provide a comprehensive description of all potential uses. Planning applications should focus on outlining the broad 'envelope' of activities without requiring precise details for each potential use.</li> </ul> </li> <li>• <i>Anticipated Activity vs. Precision</i> <ul style="list-style-type: none"> <li>– Projects of this nature can only anticipate or expect activity without being overly precise, as highlighted in the subsequent dot point in 1.3.1.</li> <li>– The planning application should capture the general nature of activities without the need for exhaustive details on each potential use.</li> </ul> </li> <li>• <i>Flexibility in Detailing Approvals</i> <ul style="list-style-type: none"> <li>– Proponents should be granted flexibility to tailor the level of detail to the specific permits they are seeking.</li> <li>– This approach ensures that planning approvals focus on key aspects relevant to the planning process, avoiding unnecessary and overly detailed requirements that may be more appropriate for other permit processes</li> </ul> </li> <li>• <i>Design Requirements</i> <ul style="list-style-type: none"> <li>– It is noted that in the background section of the draft Guidelines, three Acts are referenced. These are: Land Use Planning and Approvals Act 1993, <u>Environmental Management and Pollution Control Act 1994</u>, and <u>Historic Cultural Heritage Act 1995</u>. This does not include the <u>Building Act 1996</u> as building and plumbing permits and approvals should be sought after the integrated and planning assessment has been undertaken and the high-level design is resolved through the assessment process.</li> </ul> </li> </ul>

Item	Comments by Tasmanian State Service
	<p>This multistage process reflects the importance of the initial planning process and also the potential for amendments and revisions or conditions to arise through the integrated planning assessment. This process is important to inform the detailed design process.</p> <p>This consistent with our understanding of how the legislative framework created under <i>the State Policies and Projects Act 1993</i> operates to regulate the assessment and approval of Projects of State Significance. In particular:</p> <ul style="list-style-type: none"> <li>○ the scope of the legislative provision in section 19 of the <i>State Policies and Projects Act 1993</i> ‘turns-off’ relevant controls for Projects of State significance relating to ‘use or development’ only, rather than matters regulated under the <i>Building Act 2016</i>;</li> <li>○ the requirement in section 20(1) of the <i>State Policies and Projects Act 1993</i> states that the Commission is required to undertake an integrated assessment in accordance with the Minister’s Direction for the project dated 16 October 2023. All of the directions that have been made for this project relate to use and development, rather than matters that are regulated under the <i>Building Act 2016</i>; and</li> <li>○ the requirement in section 20(5) of the <i>State Policies and Projects Act 1993</i> is that the integrated assessment seeks to further the objectives set out in Schedule 1 of that Act and be undertaken in accordance with State Policies. The objectives set out in Schedule 1 are the ‘Objectives of the Resource Management and Planning System of Tasmania’, which are the same as those set out in the <i>Land Use Planning and Approvals Act 1993</i> and make no reference to matters regulated under the <i>Building Act 2016</i>. In addition, no State Policies are relevant to matters regulated under the <i>Building Act 2016</i>.</li> </ul> <p>However, section 1.3 <i>Proposed Use and Development</i> of the draft guidelines seeks detailed design information in excess of what is likely to be required to undertake an integrated assessment to assess the environmental, social, economic and community impacts of the Project.</p> <p>Accordingly, it is requested that the guidelines are amended to seek indicative information rather than requiring ‘plans are to be detailed in design’, ‘full details’ or ‘a full description’. Specific examples include:</p> <ul style="list-style-type: none"> <li>○ for the reference to plans are to be detailed in design at the start of section 1.3.1 to be replaced with plans are to show a schematic design; and</li> <li>○ for the insertion of the word indicative at the start of the third dot point under the sub-heading ‘Development’, which requires ‘the building form, height, detailing and finishes of proposed buildings and works’.</li> </ul>
1.4 Design and management response	<ul style="list-style-type: none"> <li>• 1.4.1 (<i>last paragraph</i>) – implies that only negative effects on people’s social, economic and cultural wellbeing (as these impacts are to be avoided, minimised or offset). Should the request specify only negative impacts, or is there an expectation that reports should include positive impacts? If the latter, then the paragraph needs amending to reflect this.</li> <li>• 1.4.3 (<i>point 1</i>) – should this include reference to any hazard and /attenuation zones?</li> <li>• <i>Appropriate Planning Benchmarks</i></li> </ul>



Item	Comments by Tasmanian State Service
	<ul style="list-style-type: none"> <li>– The Guidelines extensively refer to identifying and addressing planning-related provisions in various statutory and non-statutory documents.</li> <li>– It is suggested that, while these are reference points, the nature of the PoSS process is to establish 'project-specific guidelines' rather than compile existing controls.</li> <li>– The assessment criteria for the Bridgewater Bridge Major Project focus on broader considerations, without specific references to planning scheme provisions.</li> <li>• <i>Sullivans Cove Area</i> <ul style="list-style-type: none"> <li>– The Sullivans Cove area is highly regulated, influenced by recent interpretations of foundational planning studies and policies.</li> <li>– A PoSS should be benchmarked against underpinning values and strategic directions rather than codified planning controls or current expressions of those controls.</li> <li>– The matters outlined in 2.1.2 would be reorganised to prioritise legislative objectives, foundational planning objectives, and principles, with less emphasis on current planning scheme controls.</li> <li>– The PoSS process supports post-approval planning scheme amendments to align statutory controls with the project, allowing the proponent to make a case for approval outside normal planning scheme rules.</li> </ul> </li> <li>• <i>Macquarie Point Precinct Plan (as example/reference)</i> <ul style="list-style-type: none"> <li>– The current Macquarie Point Precinct Plan is reflected in the planning scheme Site Development Plan controls, following a process under the <i>Macquarie Point Development Corporation Act</i>.</li> <li>– These controls prescribe a specific urban design outcome based on a particular vision, which the government is currently revising under the Premier's Direction to the Commission.</li> <li>– The revision of the Macquarie Point Precinct Plan is considered the appropriate benchmark, emphasising the dynamic nature of planning benchmarks.</li> </ul> </li> <li>• <i>Historic Cultural Heritage Section</i> <ul style="list-style-type: none"> <li>– The historic cultural heritage section focuses on documenting site significance and impacts or management without providing an opportunity for the proponent to justify disturbing, relocating, or demolishing a place against broader social, economic, and other benefits.</li> </ul> </li> <li>• The Guidelines should allow the proponent to present justifications for actions that impact historic sites in the context of broader benefits beyond preservation concerns.</li> </ul>

2. Policy, strategy and legislative context	
2.1 SPP Act and RMPS legislation	<ul style="list-style-type: none"> <li>• <i>Point 2</i> – reference to Appendix E requires amending to Appendix D.</li> <li>• 2.1.2 – should the list of relevant legislation include the <i>Aboriginal Heritage Act 1975</i>? Should the requirement include a statement regarding implications or otherwise of relevant Commonwealth legislation (e.g. <i>Environment Protection and Biodiversity Conservation Act 1999</i>)?</li> </ul>
2.2 Governmental policy and strategy	<ul style="list-style-type: none"> <li>• 2.2.1 – It is not clear from this section how to determine whether a strategy or plan is required for inclusion i.e. is there a status threshold (i.e. endorsed by the relevant body)? Or a requirement relating to public accessibility of such plans and strategies?</li> </ul>
3. Economic development and social, cultural and community wellbeing	
	<ul style="list-style-type: none"> <li>• <i>Economic Evaluation</i> <ul style="list-style-type: none"> <li>– It is acknowledged that the Commission has included an intention not to limit the methodologies that may be used to assess the economic, social and cultural effects of the project in its Guidelines. However, it is recommended that the economic evaluation be expanded to fully capture the benefits and costs that accrue to consumers if the project is implemented.</li> </ul> </li> <li>• <i>Cost-Benefit and Economic Impact Assessments</i> <ul style="list-style-type: none"> <li>– The Guidelines should consider how the benefits and costs, to be estimated as part of the Cost-Benefit and Economic Impact assessments, are measured and valued in monetary terms.</li> </ul> </li> <li>• <i>Willingness To Pay</i> <ul style="list-style-type: none"> <li>– The Guidelines should specifically include the principle that evaluation is based on user's willingness to pay (WTP) for a good or service – i.e., the maximum price that an individual would be willing to pay for a good or service. The principle includes asking people directly what they are willing to pay for goods or services in the future. This methodology is largely based on surveys and questionnaires using stated preference techniques are frequently used to estimate what people would pay for a benefit gained from the resources used.</li> </ul> </li> </ul>
3.1 Cost-Benefit Analysis (CBA)	<ul style="list-style-type: none"> <li>• <i>Nil comment</i></li> </ul>
3.2 Economic Impact Assessment (EIA)	<ul style="list-style-type: none"> <li>• <i>Financial Decisions</i> <ul style="list-style-type: none"> <li>– The final paragraph states '<i>The economic impact report should also consider the opportunity cost of domestic investment – for example, a "counter-factual" estimate of the impact of an alternative investment of equivalent public funds. The report should also consider the degree of 'crowding out' that may occur through construction stage activities.</i>'</li> </ul> <p>Decisions around the investment of public funds is a policy consideration for which there are existing budget processes.</p> </li> </ul>

	<p>Comparatively, the assessment of previous projects has considered the economic impacts of the proposal not proceeding.</p> <p>There are existing processes for the review and scrutiny of government budget and financial management and decision making. As a proponent, the Macquarie Point Development Corporation is not reasonably in a position to make assumptions, assertions or to comment on whole-of-government decision-making on either financial or policy matters more broadly.</p> <ul style="list-style-type: none"> <li>• <i>Employment Impacts</i> <ul style="list-style-type: none"> <li>– Under this heading, the second paragraph states <i>‘The modelling is to show the direct and indirect/induced economic effects resulting from indicators such as GDP, employment, real income per capita and industry sector output.’</i> Comparatively, it is noted that the Lauderdale Quay, Pulp mill, Basslink and Oceanport PoSS guidelines all provided for an assessment of the employment impacts.</li> </ul> </li> </ul> <p>Our interpretation is that the reference to employment in this section should also be reasonably interpreted to include employment impacts. Please advise if this is not an appropriate interpretation. If this is not the case, it is requested that employment impacts be specifically included in the guidelines.</p>
3.3 Financial Impact Report (FIR)	<ul style="list-style-type: none"> <li>• <i>Precedents for Financial Matters</i> <ul style="list-style-type: none"> <li>– This section of the draft Guidelines requires an assessment of the State’s projected financial position, compared with a projected financial position for the State on a <i>‘no policy change’</i> basis.</li> </ul> <p>Comparatively, the PoSS guidelines for the Lauderdale Quay, Pulp mill, and Basslink projects focus on the impacts of public revenue as an additional expense stemming from the relevant project (such as public expenditure for impacts, subsidy, supplied benefits) as well as any public revenue generated by the project.</p> <p>The approach taken in the draft Guidelines for this multipurpose stadium is inconsistent with the precedent to date. Further the impacts on the State's financial position, trends, financial ratios and the State's credit rating are not relevant to assessing the merits of the project as proposed.</p> <p>There are existing statutory and established internal to government and external public scrutiny processes and pathways to review government budget processes. The draft Guidelines should focus on the integrated assessment of the project rather than the broader activity and mechanics of government, which appear to be out of scope, particularly noting there are existing direct mechanisms for these.</p> </li> <li>• <i>Project Impacts on Proponent</i> - It is recommended that this section should focus on the financial impact of the project on the proponent as distinct from the government. It is not the role of the proponent to determine the financial impact of the project on the government, nor is it the role of the Tasmanian Planning Commission to specifically assess this.</li> <li>• <i>Paragraphs 3 and 4</i> – it is recommended these paragraphs be deleted, and reference to the State should be changed to the proponent.</li> </ul>
3.4 Social and Cultural Analysis Report	<ul style="list-style-type: none"> <li>• <i>Additional Text</i> – it is suggested that an additional dot point be included: <i>‘effects on Aboriginal cultural heritage sites and values’</i>.</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Final Dot Point</i> – it is suggested that the last point ‘effects due to changes in the cost and supply of residential accommodation in the greater Hobart area during construction’ should be deleted. While perhaps relevant to construction impacts, it is not considered relevant to ‘social and cultural analysis.’</li> </ul>
3.5 Sensitivity and comparative analyses and information documentation	<ul style="list-style-type: none"> <li>• <i>Nil comment</i></li> </ul>
<b>4. Landscape and Urban form</b>	
4.1 Landscape and visual values	<ul style="list-style-type: none"> <li>• <i>4.1.1</i> – the Guidelines should be clear that the concept of landscape includes the reclaimed area of Macquarie Point (the majority of the site). The Guidelines refer to assessing landscape in its broadest sense, but do not include the reclaimed Cove Floor areas explicitly within this. It refers to ‘natural landforms, waters and ecosystems, human settlement and people’s association with place’. The Macquarie Point site and the adjacent TasPorts land are approximately 22 hectares all of which is reclaimed. This is the predominant ‘landscape’ element. The following considerations in 4.1.3 make reference to the Cove Floor and urban morphology so it is important that the site is recognised within this framework.</li> <li>• <i>4.1.1</i> – as 4.1.1 states ‘the landscape should be assessed in its broadest sense’ and ‘the definition of landscape is to include natural landforms, waters and ecosystems, human settlement and people’s association with place,’ it is recommended that 4.1.3 – include ‘the cultural significance of known Aboriginal heritage and landscape scale Aboriginal cultural values’.</li> <li>• <i>Presentation of Sensitive Information</i> - clarification is needed regarding the line ‘advice from Aboriginal Heritage Tasmania will be obtained on how sensitive information is to be presented in reports’. It is noted this is a requirement under the <i>Land Use Planning &amp; Approvals Act 1993</i> with regard to Major Projects (s.60BA), however confirmation that it also applies to Projects of State Significance is requested, and if so, what the associated legislation and process is?</li> </ul>
4.2 Urban form of Sullivans Cove	<ul style="list-style-type: none"> <li>• This section is broadly supported as representing the relevant foundational considerations for the proposal in 4.2.4 although the Planning Scheme references should be relevant only to the area outside of the Macquarie Point site. Some reconciliation of the other preceding sections (2.1.2 for example) with this may be required to ensure the Guidelines are not unwittingly creating an internal inconsistency.</li> </ul>
<b>5. Cultural Heritage</b>	
5.1 Historical and cultural context	<ul style="list-style-type: none"> <li>• Recommend rewording to ‘Aboriginal cultural history context and the current relationship of Aboriginal people with the project site and broader area’.</li> </ul>
5.2 Aboriginal heritage	<ul style="list-style-type: none"> <li>• <i>Proposed Inclusions</i> <ul style="list-style-type: none"> <li>– This section could include the requirement for reports to include proposed actions in the event of unanticipated discovery of Aboriginal heritage during both development and use phases.</li> <li>– It is recommended that the entirety of Section 5.2 (Aboriginal heritage) be updated to mirror the level of detail required for Section 5.3 (historic heritage), including the following changes: <ul style="list-style-type: none"> <li>○ At 5.2.1: Amend dot point ‘the known and potential Aboriginal heritage within the project footprint (including all access roads, trenching and material storage sites etc) and broader contextual study area’.</li> </ul> </li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Unless the intention of the second dot point is to address non-physical impacts, suggest amending it to ‘measures that will be undertaken so that development which <del>may have adverse effects</del> impact on the <del>cultural significance</del> of Aboriginal heritage is avoided or managed in an acceptable manner accordance with the <i>Aboriginal Heritage Act 1975</i> and Aboriginal Heritage Standards &amp; Procedures.’</li> <li>○ Add dot point ‘cultural heritage significance statement informed by Tasmanian Aboriginal people’.</li> <li>○ Add dot point ‘the detailed plan for meaningful collaboration with Aboriginal people at all stages of the development, including early consultation with Aboriginal people and engagement with Aboriginal Heritage Tasmania in the initial and subsequent design stages’.</li> <li>○ At 5.2.2: Amend dot point ‘the extent to which the development <del>affects</del> impacts Aboriginal heritage protected under the <i>AHA 1975</i> and Aboriginal landscape values’</li> <li>○ Amend dot point ‘the <del>cultural</del> significance of known and potential Aboriginal heritage within the project site to Tasmanian Aboriginal people and the degree to which the location and design of proposed development avoid <del>adverse effects</del> impacts to this heritage’</li> <li>○ Add dot point ‘the options investigated for avoiding or mitigating impacts to known or potential Aboriginal heritage, including how the outcomes of community consultation on these options have been incorporated into the design’.</li> <li>○ At 5.2.3: Reword to ‘the assessment <del>may</del> should be informed and guided by relevant principles and process outlined in the Guidelines established under the <i>AHA 1975</i> and in the Aboriginal Heritage Standards &amp; Procedures, <del>AHT 2017</del>’.</li> </ul> <p>– Add ‘the Burra charter and associated guidelines, particularly the Indigenous Cultural Heritage Practice Note, and the ‘Ask First’ national best practice guidelines for respecting Indigenous heritage places and values’.</p>
5.3 Places and precincts of historic cultural heritage significance	<ul style="list-style-type: none"> <li>● At 5.3.1: ‘the reports are to describe the <del>historic-cultural</del> Aboriginal heritage characteristics and significance of the known and potential heritage <del>site buildings, structures, streetscapes and spaces</del> on the project site and adjacent area. The reports are to assess the effect of the proposed project on the <del>historic-cultural</del> Aboriginal heritage characteristics and significance.’</li> <li>● At 5.3.2: ‘The reports are to assess: <ul style="list-style-type: none"> <li>– what is significant about the places or precincts in terms of their <del>historic-cultural</del> Aboriginal heritage values and whether some parts are more significant than others;</li> <li>– the degree to which the proposed project complements and contributes to the values of places or precincts of <del>historic-cultural</del> Aboriginal heritage significance;</li> <li>– the effect of the use, location, bulk, form and appearance of the proposed project on the values of <del>places or precincts of historic</del> Aboriginal cultural heritage significance;</li> <li>– what measures, if any, are proposed to avoid or <del>ameliorate</del> mitigate any <del>adverse effects</del> impacts; and</li> <li>– whether the proposed project will result in any heritage <del>conservation</del> protection or promotion benefits that might offset any impacts. <del>adverse effects</del>.’</li> </ul> </li> </ul>

- At 5.3.3: 'In preparing the reports, without limiting the scope, specific consideration is to be given to all places and precincts of ~~historic cultural~~ Aboriginal heritage significance as well as cultural landscape precincts and values ~~local historic landscape precincts~~ listed in the ~~Tasmanian~~ Aboriginal Heritage Register or informed by Tasmanian Aboriginal people, ~~Sullivans Cove Planning Scheme 1997, Hobart Interim Planning Scheme 2015 and draft Hobart Local Provisions Schedule that are:~~
  - on the Macquarie Point site;
  - on Evans Street or Hunter Street;
  - on the Cenotaph and Regatta Grounds at 20 McVilly Drive;
  - within 200m of the title boundaries of the project site; and
  - relevant to the site in relation to the Derwent River.'
- 5.3.4: 'The reports are to be informed by:
  - The Burra Charter and associated guidelines, in particular *Indigenous Cultural Heritage Practice Note*.
  - Aboriginal Heritage Standards & Procedures
  - Advice from Aboriginal Heritage Tasmania.
  - where relevant, the Queens Domain Cultural Heritage Management Plan 2002.'
- At 5.3.5: 'Without limiting the content of the reports, the following information is to be provided:
  - A list and plans detailing the location of all places ~~and~~ listed under the ~~Tasmanian~~ Aboriginal Heritage Register, ~~Sullivans Cove Planning Scheme 1997, Hobart Interim Planning Scheme 2015 and draft Hobart Local Provisions Schedule~~ on the project site and adjacent area;
  - ~~— Elevation plans and photomontages of the proposed development showing the impact and effect of the proposal on each identified historic cultural heritage significance. Photomontages are to be shown from eye level using a standard 50mm lens view, not wide angle or telephoto, showing the proposed project from multiple aspects that clearly demonstrate any impacts and effects. Photographic images showing the current situation are to be provided from the same aspect as each photomontage. Any deciduous trees are to be shown without leaf;~~
  - Where relevant, ~~Heritage Impact~~ Aboriginal Heritage Assessment Reports, including mitigation or avoidance ~~or Conservation Management Plans~~; and
  - Details of any proposed disturbance, relocation or demolition relating to places of ~~historic cultural~~ Aboriginal heritage significance, including:
    - ~~○ whether the works are approved as part of any conservation plan;~~
    - how affected elements will be recorded;
    - any proposed reuse management or storage of artefactual materials; and
    - detailed justification for the works.'

5.4 Historical Archaeology	<ul style="list-style-type: none"> <li>• Amend title: ‘<del>Historical</del> Archaeology’</li> <li>• Amend all references throughout Section 5.4 to ‘Aboriginal and historic archaeological potential/values/significance etc’</li> <li>• At 5.4.3, add a dot point: ‘the Aboriginal Heritage Register’</li> <li>• At 5.4.4, add a dot point: ‘the Aboriginal Heritage Standards and Procedures as well as regulatory guidance on the Aboriginal Heritage Tasmania website’.</li> <li>• At 5.4.5: <ul style="list-style-type: none"> <li>– Reword to ‘plans showing the location of all archaeological assets, features or places of archaeological potential, including those identified in the Aboriginal Heritage Register, Tasmanian Heritage Register, Sullivans Cove Planning Scheme... etc’ – [as long as this inclusion is not mutually exclusive with managing culturally sensitive information].</li> <li>– Add a dot point ‘evidence of engagement with Aboriginal Heritage Tasmania and consultation with Aboriginal people on sampling program methodology’.</li> <li>– Add a dot point ‘plans for how and where any archaeological artefacts discovered will be managed and stored, developed in consultation with Tasmanian Aboriginal people’.</li> <li>– Add a dot point ‘plans for public interpretation boards for the site regarding significant Aboriginal cultural heritage impacted by the development’. It is noted that the Aboriginal Heritage Council was advised this signage would occur the Acting CEO of the Macquarie Point Development Corporation (August 2023 meeting).</li> </ul> </li> </ul>
6. Movement	
	<ul style="list-style-type: none"> <li>• <i>General Comments on the Suitability of the Assessment Criteria</i> <ul style="list-style-type: none"> <li>– The draft assessment criteria for movement are long and confusing in parts, with significant overlap between sections. It is recommended the assessment criteria are redrafted and condensed to reflect a more concise and logical assessment methodology. For example, to clearly require the proponent to address the current transport task and network (including the extent of the network to be assessed), expected transport task associated with the proposal (event and non-event daily site operations), clearly defined transport modelling scenarios, and required infrastructure, service and management responses. As the criteria are currently drafted, these matters are not clearly defined and/or are addressed across multiple criteria and sections. 6.1 (Travel scenarios and management options) requires particular review.</li> <li>– The redraft should not detract from the wide range of matters the proponent will need to assess for what is a complex project with significant transport impacts, however it should provide clearer guidance to the proponent (and the broader community) as to what needs to be assessed. An updated structure will also better assist the proponent in providing quality, relevant outputs, and therefore improve the overall assessment process.</li> </ul> </li> <li>• <i>Movement Assessment not in Isolation</i> <ul style="list-style-type: none"> <li>– Given the draft assessment Guidelines only relate to the development of the stadium and related services and infrastructure, and not to the broader Macquarie Point precinct, the full transport impacts of developing the</li> </ul> </li> </ul>

	<p>precinct over time will not be assessed through this process. It is vitally important to note that the stadium development and associated movement cannot be assessed in isolation of the wider precinct site development proposed around the stadium, with any infrastructure requirements needing to have capacity to cater for this entire precinct.</p> <ul style="list-style-type: none"> <li>– It is also important that the Guidelines are drafted in a way that reflect the operation and constraints of the existing network. For instance there are specific times of the day and the week during which the network nears capacity. At other times traffic flow and management is not a material concern.</li> </ul> <ul style="list-style-type: none"> <li>• <i>Relationship to the Transport Network</i> <ul style="list-style-type: none"> <li>– The site is constrained in terms of the existing transport network. It is located at the junction of four major arterial roads, with limited footprint for expansion of the transport network. There is limited spare capacity to accommodate increased vehicular activity. The broader transport network, public transport services, and active transport options need to be considered as part of the broader plan for accessing the site.</li> <li>– At the same time, this location also offers significant opportunities in terms of centralising access and reducing reliance on private car travel to the area for major event, as well as all other times when no full stadium events are proposed.</li> <li>– The stadium and surrounding precinct cannot be planned and designed in isolation from the adjacent transport network, and integration with this network will be critical for the stadium and surround site development to be successful.</li> <li>– When examining the impacts to the Greater Hobart transport network, all modes (walking, wheeling, riding, public transport, private vehicles and freight) and existing and future infrastructure (such as identified in the Greater Hobart Cycling Plan) must be considered. Continuation (and improvement) of access for all modes is important for the stadium development to be successful.</li> </ul> </li> <li>• <i>Specific Considerations</i> – the assessment needs to consider a wide range of scenarios, including demand and management of: <ul style="list-style-type: none"> <li>– Major stadium events on different days and times of the week to capture the different demands on the network.</li> <li>– Smaller stadium events, where there may be fewer people attending, but transport arrangements need to be consistent with other stadium events for improved user legibility and ease of operational implementation.</li> <li>– Conferences etc, with a different demand profile in terms of attendees, transport requirements and time of day.</li> <li>– Everyday use of the site by taking into consideration, for example, residents, workers, visitors, maintenance activities, service vehicles etc. that will be visiting the site</li> <li>– Various stages of construction, taking into account traffic generation and any changes to site access arrangements.</li> <li>– Different mode-share (walking, wheeling, public transport, private vehicles and freight) assumptions for each of the above, noting that assumptions should be as realistic as possible (more ambitious assumptions could also be considered as separate scenarios noting that these are to be recognised as such).</li> <li>– The scenarios should consider the Tasmanian Government’s draft Plan for Keeping Hobart Moving – because the movement of traffic today will not be exactly the same in 10 years. For example, actions and work are already underway for bus priority measures around Greater Hobart.</li> </ul> </li> </ul>
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- The scope of the assessment must include the wider Hobart transport network, including the Tasman Highway, Brooker Highway, Domain Highway, Macquarie Street, Davey Street, Southern Outlet, regional and local shared paths and active transport facilities, suburban and regional bus services and supporting facilities, and central and remote ferry facilities.
  - At the local scale, an assessment of the impact of the proposal on McVilly Drive, Tasman Highway/Tasman Bridge, Evans Street, Franklin Wharf area, Brooker/Tasman/Macquarie St/Davey St intersection, Hobart CBD are required, as a minimum.
  - Interaction between different transport modes should be considered – such as potential bus stop locations to general traffic flow, pedestrians impacts to traffic signal operation, pedestrians and wheeled personal transport in shared spaces or separated facilities.
- *Events and Day-to-day Activities*
  - Transport management planning for events and day-to-day activities should be based on key principles including
    - Minimise reliance on private car travel and maximise use of public and active transport for all visitors to the precinct.
    - Physical separation of conflicting transport activities,
    - Access to surrounding areas, such as the Hobart Port and the broader Hobart CBD area, must be retained at all times, or suitable alternatives provided.
    - Provide a consistent approach to transport management that is adaptable to various event sizes and types. This will benefit both users of the precinct, and transport authorities seeking to manage and operationalise access to and from the precinct.
    - Utilise permanent transport arrangements/facilities in preference to significant temporary infrastructure and services for events
    - Utilise existing on and off street parking in and around the Hobart CBD and stadium precinct.
    - Connection to the InterCity cycleway and other shared walking and wheeling paths in the area.
- *Transport Models (noting both have limitations)*
  - Greater Hobart Urban Travel Demand Model – a strategic transport model, which considers changes in population and land use distribution across the Greater Hobart urban area. The model reflects travel on a ‘typical’ day for a range of trip purposes, however it could not be directly applied to a major event scenario.
  - Hobart Hybrid Model – a mesoscopic and microsimulation model of the road network within inner Hobart. The model is focussed on the morning and afternoon peak periods of a typical weekday, and also could not be directly applied to a major event scenario.
  - Both models can be made available for use by the proponent, as appropriate.
  - In planning for any supporting infrastructure such as Intelligent Transport Systems (ITS), consideration should be given to integration with existing systems operated by the government. The section of the Tasman Highway between the Hobart CBD and Mornington (including the Tasman Bridge) contains extensive ITS used for the control and management of traffic. Expansion or integration with these existing systems is expected.

6.1 Travel scenarios and management options	<ul style="list-style-type: none"> <li>• <i>Nil comment</i></li> </ul>
6.2 Traffic, freight and transport routes	<ul style="list-style-type: none"> <li>• The importance of maintaining accessibility for ambulance and emergency vehicles in order to ensure business continuity should be noted.</li> </ul>
6.3 Access: mass/public transport, car use and parking	<ul style="list-style-type: none"> <li>• <i>Vehicle Pedestrian interaction</i> - There are multiple references to ensuring that pedestrians have safe access to and from the site (6.3.3. and 6.4.2), however there isn't much detail on what the reports should contain to address this. In particular, I think that the management of potential vehicle-pedestrian interactions at nearby Davey and Macquarie Streets, which have some of the highest daily vehicle volumes on the road network, requires particular attention given the potential safety risk. For example, how will traffic signal operations ensure that there is adequate crossing time for increased numbers of pedestrians before/after events, how will adequate space be provided for pedestrians to queue while waiting to cross, etc.</li> </ul>
6.4 Pedestrian/cycling movement	<ul style="list-style-type: none"> <li>• <i>Active transport parking</i> - The report required under section 6.4 (pedestrian/cycling movement) should include consideration of appropriate facilities to enable safe and secure parking of bicycles and other active transit modes (e.g., an appropriate number of bike racks in well-lit, publicly accessible areas). This could also fall under 6.1 (travel scenarios and management options) which speaks to encouraging and supporting active transport.</li> </ul>
7. Activity and land use	
7.0. Activity and land use	<ul style="list-style-type: none"> <li>• Recommend that a dot point could be added at 7.03: 'the future potential use of the proposed Aboriginal cultural centre/precinct for remembrance, commemorative events or other activities'.</li> </ul>
8. Environmental quality and hazards	
8.1 Wind effects	<ul style="list-style-type: none"> <li>• <i>Nil comment</i></li> </ul>
8.2 Overshadowing	<ul style="list-style-type: none"> <li>• <i>Nil comment</i></li> </ul>
8.3 Light	<ul style="list-style-type: none"> <li>• Consideration should be given as to whether the reports consider both the development and use phases?</li> <li>• <i>Seabirds</i> <ul style="list-style-type: none"> <li>– To minimise disturbance to seabirds, including short-tailed shearwaters (<i>Ardenna tenuirostris</i>) that are likely to be flying through the Macquarie Point site, it is recommended that construction activities are conducted during daylight hours (short-tailed shearwaters are most active at dawn and dusk).</li> <li>– It is important that illumination of the site at night is minimised as this can disorient shearwaters returning to their roosts. If there is to be any form of additional night-time lighting associated with the construction area for safety (or other) reasons, the illumination should be kept to a minimum and red lighting should be used. It is recommended that the principles outlined in the Australian Government Department of Climate Change, Energy, the Environment and Water's <a href="#">National Light Pollution Guidelines for Wildlife</a> are incorporated into the lighting design for the proposal in order to reduce the impacts of artificial light during night time hours to seabirds and shorebirds, in particular Appendix A - Best Practice Lighting Design.</li> </ul> </li> </ul>

8.4 Noise and vibration	<ul style="list-style-type: none"> <li>• The first sentence in this section notes ‘The reports are to describe all sources of noise and vibration from the use of the proposed project...’ It is suggested that this is amended to all sources of noise and vibration that can be reasonably identified from the use of the proposed project...</li> <li>• Consideration should be given as to whether the reports consider both the development and use phases?</li> </ul>
8.5 Water quality and water management	<ul style="list-style-type: none"> <li>• Consideration should be given as to whether the reports consider both the development and use phases?</li> <li>• The Macquarie Point site is adjacent to the River Derwent, within the core habitat range for the spotted handfish (<i>Brachionichthys hirsutus</i>), listed as endangered under the Tasmanian <i>Threatened Species Protection Act 1995</i> (TPSA) and Critically Endangered under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBCA). It is recommended that measures are implemented in both the construction and operational stages of the development to ensure that runoff from the site into the River Derwent is managed appropriately to prevent any degradation of water quality within spotted handfish habitat.</li> <li>• Under Section 8.5.1, suggest that the reference to ‘environmental impacts’ is very broad. It is suggested that further detail be included as a reference to the types of environmental impacts to be considered, with this including risks associated with disturbance and re-suspension of sediments within the Derwent Estuary associated with any proposed development.</li> </ul>
8.6 Solid waste and hazardous material management	<ul style="list-style-type: none"> <li>• Consideration should be given as to whether the reports consider both the development and use phases?</li> <li>• It is noted that, in addition to evaluating the potential for human health to be affected by wastes from the project (both generated by the operation of the stadium once constructed, but also waste generated during the construction process), the reports should consider mitigation strategies that may be required to adequately manage any identified human health impacts.</li> </ul>
8.7 Environmental hazards	<ul style="list-style-type: none"> <li>• <i>Additional hazards</i> <ul style="list-style-type: none"> <li>– Consideration should be given as to whether the reports consider both the development and use phases? (added the following matters [<b>in bold</b>]). The reports are to identify and describe any environmental hazards within or adjacent to the project site, including but not limited to: <ul style="list-style-type: none"> <li>○ overland flooding;</li> <li>○ <b>groundwater fluctuations related to buried segments of Hobart Rivulet;</b></li> <li>○ acid sulphate soils;</li> <li>○ landslip;</li> <li>○ <b>ground subsidence;</b></li> <li>○ <b>liquefaction;</b></li> <li>○ coastal inundation; and</li> <li>○ contaminated land.</li> </ul> </li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>– The following comments provide context to support these changes – The level of risk related to various of hazards (such as flooding and groundwater levels) is unclear and may be negligible. However, in light of the scale/cost of the infrastructure and the large number of site users that could be exposed to harm, these risks should be evaluated to demonstrate that they are acceptable.</li> <li>– Recommend the inclusion of man-made hazards (e.g., acts of violence, terrorism, crime) in addition to natural hazards.</li> <li>– Recommend that the draft Guidelines include criteria in section 8.7, that provide for the assessment of environmental hazards within or adjacent to the project site, including assessment of overland flooding, acid sulphate soils, landslip, coastal inundation, and contaminated land hazards.</li> <li>• <i>Risk Management</i> - The draft Guidelines require environmental hazard reports that describe risk management measures for any hazards identified, with the measures to include emergency management requirements and responses. The reports also require details about standards and levels of tolerable risks, hazard assessment methodologies that include assumptions and statements about uncertainties.</li> <li>• <i>Public Health Implications</i> - Recommend noting environmental hazards can have a link with public health impacts.</li> <li>• <i>Environmental Hazards</i> - The level of risk related to the potential environmental hazards is unclear and may be negligible. However, in light of the scale/cost of the infrastructure and the large number of site users, the Commission should consider whether additional reports are required under section 8.7 (environmental hazards) on groundwater fluctuations, ground subsidence and liquefaction.</li> </ul>
8.8 Climate change	<ul style="list-style-type: none"> <li>• <i>Suggested the following text be added [in bold]</i> - <ul style="list-style-type: none"> <li>– The reports are to outline the potential effects of climate change and sea level rise implications from a risk management perspective, including adaptive management strategies. The reports are to include relevant modelling of sea level rise predictions (relevant to the expected life of the proposed project) <b>based on the latest available climate projections data</b> and incorporate ‘worst case’ storm surge <b>and sea level rise</b> scenarios. The analysis is to include an outline of any compounding <b>or cascading</b> effects the proposed project may have on the adjacent area and infrastructure occurring as a result of sea level rise.</li> </ul> </li> <li>• <i>Resilience to Heat</i> <ul style="list-style-type: none"> <li>– Recommend that in recognition of the predicted increase in the frequency and severity of heat wave events, reports should consider design and operational features of the development that will enhance community resilience to the impacts of heat.</li> </ul> </li> </ul>
9. Other planning matters	

9.1 Signs	<ul style="list-style-type: none"> <li>Recommend amending 9.1.1 to: 'effects and means of attachment on any places of historic cultural heritage significance or Aboriginal cultural heritage significance'.</li> </ul>
9.2 Construction Management	<ul style="list-style-type: none"> <li>Recommend that the issues addressed in Section 8 (environmental quality and hazards) be mirrored in Section 9.</li> <li>The draft Guidelines are silent on the assessment and management requirements relevant to impacts on water quality associated with the construction phase of the development. Consideration should be given to assessment relevant to risks and management practices to mitigate any re-suspension of historical heavy metal contaminants within estuary sediments.</li> <li>The draft Guidelines are silent on the assessment and potential management of airborne hazards (notably dust) associated with construction activities relevant to the project (including emissions associated with heavy vehicles entering and exiting the construction site). A specific section requiring reports on air quality/dust assessment/monitoring and management should be included in the draft Guidelines.</li> </ul>
9.3 Utility Services	<ul style="list-style-type: none"> <li><i>Location of Services</i> <ul style="list-style-type: none"> <li>Utility services are constructed in dedicated easements and corridors clear of other infrastructure, and specifically clear of road and transport corridors where possible.</li> </ul> <p>The above comment is made since this is standard design practice, and we want to minimise services under roads to minimise the potential for affecting the infrastructure if a failure occurs, plus minimise the impact if a part or full road closures is required to undertake routine or emergency maintenance activities in future.</p> </li> </ul>
9.4 Emergency management and incident response	<ul style="list-style-type: none"> <li><i>Emergencies Outside of the Stadium</i> <ul style="list-style-type: none"> <li>Recommend that from an emergency management perspective, it may be appropriate to include emergency management arrangements for emergencies that occur outside the Stadium. For example, a dot point could be added at 9.4.1, such as: 'How the design of the stadium provides for the creation of temporary safe areas within the stadium, and the maintenance of these safe areas for an acceptable duration, to support the response to an emergency event should one occur within the project site or in places in the locality of the stadium.'</li> <li>Recommend that the report gives consideration to potential service impacts at the Royal Hobart Emergency Department and the Hobart Urgent Care Centre as a result of increased visitation.</li> </ul> </li> <li>9.4.3 - Recommend replacing 9.4.3 with something like (amendments in italics): 'The reports are to provide maps and plans that show the design and management of roads, routes, pathways and spaces, external to the stadium building to achieve acceptable outcomes for emergency evacuation and emergency services access, <i>including for the project site and for places within the locality of the stadium including the Central Hobart precinct.</i>'</li> <li><i>Emergency Access</i> <ul style="list-style-type: none"> <li>For inclusion in these Guidelines, emergency responder needs for access, use and rehabilitation of the site. In particular emergency services operational response requirements; and</li> <li>protective security principles based on security risk and vulnerability assessments for the prevention and mitigation of any incidents. <a href="#">Australia's Strategy for Protecting Crowded Places from Terrorism</a> and its supporting guidelines outlines key security risk considerations.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- Note that the draft Guidelines include criteria in Section 1.3, 6.2.3, and 9.4 that provide for the assessment of emergency management and incident response considerations. This includes consideration of the provision of emergency services to access all areas of the stadium from the public road network in the context of a congested traffic situation and the requirement for emergency evacuation of potentially 23,000 people. SES support this approach.</li> <li>- In addition to the content relating to the design of the Stadium (9.4.1) to enable emergency services to access all areas of the stadium, it is recommended that good access and egress in and out of the stadium for emergency ambulance vehicles is ensured ,on a scale that has the potential to account for a large-scale emergency event (such as a fire in the stadium).</li> <li>• <i>Water Infrastructure and Access</i> <ul style="list-style-type: none"> <li>- The reports should adequately describe and provide information on: <ul style="list-style-type: none"> <li>○ The capacity and capability of the water infrastructure to provide the required simultaneous flows and pressures of all installed systems (including the firefighting water supply) across all design aspects of the stadium including any accommodation within the proposed development.</li> <li>○ How the design of the stadium will allow access for emergency services to a static water supply (open water source – Derwent River) as a secondary firefighting water supply.</li> <li>○ How the design of the stadium will allow access for emergency service vehicles to firefighting infrastructure, such as hydrant and sprinkler booster systems.</li> <li>○ How the design of the stadium will allow access for firefighting aerial appliances for the purpose of carryout high rise rescue and firefighting operations including hard standing over open water areas (wharf areas).</li> </ul> </li> </ul> </li> </ul>
Other feedback	
Please include any comments which do not relate directly to an item in the draft guidelines here.	<ul style="list-style-type: none"> <li>• <i>Technical Feasibility</i> - General Comment: The draft Guidelines do not appear to cover technical/engineering feasibility and related risk management e.g. subsidence risk.</li> <li>• <i>Natural Values</i> - General comment for Section 8: there is no reference to natural values (including those protected by statute e.g. threatened species etc). This omission may lead to the perception that the assessment has not been thorough (even if there are nil natural values present). It should also be noted that Commonwealth environmental legislation considers indirect and short-, medium- and long-term impacts, and there may therefore be an expectation that the PoSS assessment at least considers possible impacts in this context.</li> <li>• <i>Tasmanian Planning Commission (TPC) role and functions</i> <ul style="list-style-type: none"> <li>- TPC functions independently within the statutory planning and hold an advisory role. Under section 6 of the <i>Tasmanian Planning Commission Act 1997</i> TPC functions relate to advising Ministers, planning for coordinated transport and infrastructure, advising local government, and reviewing strategic land use planning matters, but no function or role is listed for TPC in determining government spending decisions.</li> </ul> </li> <li>• <i>TPC weighting and assessment process</i></li> </ul>

	<ul style="list-style-type: none"> <li>– The issues covered in the draft and final Guidelines are not indicative of their importance or priority in the TPC's integrated assessment</li> <li>– Public comments seem to be specifically on the Guidelines, and not the project itself – requesting further clarification to be provided.</li> <li>– Recommend TPC to provide clarity around how it plans to assess, prioritise, and/or weight their integrated assessment in accordance with the <i>State Policies and Projects Act 1993 (the Act)</i>.</li> <li>• <i>Movement, Activity and land use, and Environmental quality and hazards</i> <ul style="list-style-type: none"> <li>– Note that the sections on Movement, Activity and Land Use, and Environmental Quality and Hazards lack contextualisation of impacts concerning existing land uses that currently interact with each other.</li> <li>– The prescriptions within these sections may give the impression that the site and its surroundings are unaffected by current impacts from nearby entertainment venues, port activities, etc.</li> <li>– The benchmarks should consider the current land uses and activity levels, including those potentially accommodated by other uses and developments on the site.</li> <li>– It is essential to assess the impacts of future site development for various uses, acknowledging that these developments will inevitably affect movement, activity, land use, and environmental quality and hazards.</li> <li>– The assessment should not solely be against a 'no development' benchmark, recognizing that future development will have implications for the mentioned factors.</li> </ul> </li> <li>• <i>Aboriginal Heritage</i> <ul style="list-style-type: none"> <li>– Note that within Section 5: Planning Assessment, the Aboriginal heritage considerations (Section 5.2) are drastically minimal compared to the historic heritage considerations and requirements (Section 5.3). Further, the archaeological considerations (Section 5.4) fail to mention Aboriginal heritage at all. It is recommended that addressing this imbalance in these Guidelines, and all following, to ensure equal consideration and rigor is applied to Tasmanian aboriginal cultural heritage of 40,000 years as Tasmanian cultural heritage of 200 years.</li> <li>– Further clarification be provided throughout the document that 'historic' is used for European heritage and 'Aboriginal' for Aboriginal heritage, while 'cultural' is all types of heritage. These terms appear to be sometimes used interchangeably.</li> <li>– Note that there is no mention in the Guidelines of the proposed Aboriginal cultural centre/precinct contained in the development plans most recently submitted.</li> </ul> </li> <li>• <i>Security and Safety</i> – <ul style="list-style-type: none"> <li>– An alternative to the inclusion of the above under section 9.4 is to create a separate section on Security and Safety.</li> </ul> </li> </ul>
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