

11 November 2024

John Ramsay
Executive Commissioner
Tasmanian Planning Commission
Level 3, 144 Macquarie Street
TASMANIA 7000

Dear Mr Ramsay,

**RE: Macquarie Point Multipurpose Stadium Project of State Significance –
Submission pursuant to section 21(1) of the *State Policies and Projects Act 1993***

On 26 April 2024, The Tasmanian Planning Commission (the Commission) advised the Tasmanian Heritage Council (THC) that an integrated assessment of the Macquarie Point Multipurpose Stadium Project of State Significance (the project) had commenced under the *State Policies and Projects Act 1993* (the Act). The THC is a relevant agency with ‘an interest in the project’.

This submission is made pursuant to section 21(1) of the Act and will:

1. identify information that would assist the THC to assess the heritage impacts of the project that is not included in the reports; and
2. identify omissions from the reports that may affect the ability of THC to assess the heritage impacts of the project; and
3. outline the areas of concern for the THC that have become apparent on an initial review of the reports.

The THC is yet to complete a thorough assessment of the likely heritage impacts on the places identified as listed on the Tasmanian Heritage Register (THR) and it is anticipated that, once the assessments are complete, the THC will make a detailed representation during the public exhibition period for the panel’s consideration.

1. Information that would assist the THC

- Additional photomontages that show the proposed stadium in relation to listed places where the Cultural Landscape Impacts have been identified as high or very high in the Historic Cultural Heritage Impact Assessment, i.e.:
 - THR11961 - Henry Jones & Co. IXL Jam Factory,
 - THR12022 - Victoria Dock and Constitution Dock,
 - THR6648 - Tasmanian Museum and Art Gallery Complex,

- THR2397 - 41 Hunter Street (UTAS Centre for the Arts, formerly part of H. Jones & Co.),
- THR7137 - Cenotaph, Anzac Parade and Queen's Battery,
- THR2464 - Hobart Gas Works complex (incl. chimney),
- THR2425 - Roberts & Co. Woolstore Complex,
- THR2280 - Royal Engineers Building and Stone Post).

Of particular concern are views from Davey Street, Franklin Wharf and across Constitution and Victoria Docks.

2. Omissions from the reports

- The proposed relocation of the Goods Shed (THR10995) has not been subject to a feasibility study to verify that the structure is capable of being dismantled and re-erected in a new location. Nor has there been any assessment of the condition of the heritage fabric or consideration of necessary conservation work. It would be appropriate to provide a conservation management plan and relocation methodology to enable assessment of the heritage impacts of this component of the project.
- Historical Archaeological Assessment Sensitivity Reports have not been provided for places with high archaeological potential that are outside the project site but where ground disturbance is indicated in the proposal (i.e., THR2280 Royal Engineers Building and Stone Post, and THR10350 Hunter, Evans, Davey Street - Subsurface remains including Hunter Island, Causeway, Old Wharf Probation Station & Reclaimed Land). An assessment of archaeological impacts is excluded from the Historic Cultural Heritage Impact Assessment, and the THC would expect to receive this information prior to the exhibition period in order to assess the likely impacts on those places.
- Details of works in/around THR2280 Royal Engineers Building and Stone Post, relating to landscaping changes and the practice wickets, have not been provided and are not included in the reports.
- The Historic Cultural Heritage Impact Assessment does not provide an assessment of the impacts on the social, spiritual and other cultural values of THR7137 Cenotaph, Anzac Parade and Queen's Battery.
- The Visual Impact Assessment Report is limited in scope and does not provide sufficient detail to allow an adequate assessment of the likely visual impacts of the construction of the proposed stadium on the settings of listed heritage places; this is recognised in the Historic Cultural Heritage Impact Assessment.
- It is noted that the Historical Archaeological Assessment, Archaeological Sensitivity Report and Archaeological Method Statement is in draft form; a finalised version should be provided in order for a thorough assessment to be completed.

3. Main areas of concern for the THC

- The THC will be giving careful consideration to the impacts on the settings of places, and views to places, where cultural heritage values relating to setting and landscape may be adversely affected.
- The THC will pay particular attention to the likely impacts of the new stadium on the social, spiritual and aesthetic values of the cenotaph.

- At this stage, the THC does not consider that design mitigation measures and “iconic” architecture will necessarily be sufficient to offset the likely adverse impacts on the historic cultural heritage significance of affected heritage places, in terms of the registration criteria under the *Historic Cultural Heritage 1995*.

We look forward to further engagement with the Commission during the consultation process pursuant to s22 of the Act. Please contact Heritage Tasmania on 6165 3700 if you wish to discuss any of the matters contained in this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Torossi', with a stylized flourish at the end.

Brett Torossi

**Chairperson
Tasmanian Heritage Council**