

Statement of Evidence

Reference: Macquarie Point Multi-Purpose Stadium
Project Of State Significance Integrated
Assessment Process

Author: Neil Shephard

Field of expertise: Town Planning

Filed on behalf of: Macquarie Point Development Corporation

Date: 29 June 2025

1. EXECUTIVE SUMMARY/FINDINGS

- 1.1 The proposed Multipurpose Stadium at Macquarie Point has been declared a Project of State Significance (**PoSS**)
- 1.2 The purpose of the Stadium is described as being to create a vibrant, multi-purpose venue for professional sporting, entertainment, and community events which will stimulate economic growth and tourism in Greater Hobart and wider Tasmania.
- 1.3 This Statement of Evidence responds to instructions provided by Minter Ellison Lawyers requesting, in summary:
- A review of background materials relating including the PoSS, the Integrated Assessment Guidelines prepared by the Tasmanian Planning Commission, Macquarie Point Multipurpose Stadium Summary Report and Appendices filed as part of MPDC's submission to the TPC;
 - A review of other relevant documents, including the *Sullivan's Cove Planning Scheme (1997)*(**SCPS**);
 - Consideration of the Draft Integrated Assessment Report (**IAR**) prepared by the Commission and any representations relevant to my area of expertise and responding to any relevant issues raised;
 - Consideration of the planning merits of the Project and forming an opinion as to whether it is worthy of approval having regard to the Act, the Guidelines and other relevant matters, including the applicable planning controls, policy framework and site context.
- 1.4 In order to avoid unnecessary duplication and to assist the Commission, I have generally followed the format and scope of assessment provided by the Planning Report prepared by Ireneinc (**Planning Report**) which forms part of the project documentation (Annexure C, 17/2/25). I therefore reference the Planning Report where necessary and indicate areas of agreement, disagreement, and clarification with accompanying explanation.

1.5 Key findings

- The Sullivans Cove Planning Review (**SCPR**) does not provide any significant analysis of the Site or what future development might be appropriate; in particular the predominant industrial and railway use of the Site is not reflected in the SCPR analysis. The SCPR and its background assessment, principles and guidelines are therefore of varying degrees of relevance to the Site.
- The SCPR and the SCPS seek to reflect the 'traditional character' of Sullivans Cove without acknowledging the lack of homogeneity of development in the Cove, particularly in respect of the Site.
- Little weight is given in any of the background strategic studies, or the SCPS to the physical and functional separation of the Site from the balance of the Cove.
- The SCPR and the 2024 Site Development Plan (**2024 SDP**) call the Site 'lost space'.
- The typology of buildings and spatial use and development of the Site has historically been predominantly large utilitarian and industrial buildings surrounded by space.
- The 2024 SDP considers that because of its historical background, its location and separation from the balance of the Cove, the Site is capable of supporting larger scale buildings of different form (bulk and height) than elsewhere in the Cove.

- The Reset Masterplan and the current (2017) Site Development Plan (**2017 SDP**) respond to a previous vision that promoted relatively small to medium scale mixed residential and commercial development. They did not envisage an industrial or large-scale commercial future for the Site, and did not envisage the current PoSS. Accordingly, there are elements of both documents that are at odds with both the overall concept and the design detail of the current PoSS.
- The concept of the Stadium in terms of shape and scale is not capable of fitting the smaller rectilinear parcels prescribed in the current (2017) SDP. A new SDP is required pursuant to Part F of the planning scheme and the 2024 SDP seeks to provide appropriate new parameters.
- The proposed Stadium will be “unavoidably prominent”. Its bulk, height and scale are a direct result of its functionality. Notwithstanding that, it sits within an historically industrial setting and reflects many of the characteristics of the various uses, developments and materiality associated with the Site over time.
- The Stadium roof represents the element that will provide the greatest visual impact. The visual assessment indicates that it will reinforce the Cove Wall in Hunter Street and become part of the backdrop to the built fabric of the Cove, but has a significant impact on views to and from the Cenotaph. Whilst this will provide a new contributory element, the fundamental cultural significance of the Cenotaph should remain.
- Perceptions about the visual prominence of the building must be balanced against the desired role and functionality of the proposal in the chosen location.
- The operational requirements of the Stadium are able to be managed without negative impacts on services, infrastructure or the amenity of nearby developments and the Cove in general.
- In terms of visual and spatial impact the Stadium will be another new development in the ongoing evolution of the Cove, and is particularly suited to the background location of the Site behind the ‘built wall’, where it will not dominate the finer grained traditional developments that are considered to characterise the Cove.
- In my opinion the detailed documentation and assessment of the proposal demonstrates consistency with the guiding principles of the SCPS and the TPC Integrated Assessment Guidelines.

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2. INTRODUCTION

2.1 My name is Neil Graham Shephard.

2.2 My business address is 29 Maning Avenue, Sandy Bay.

2.3 Qualifications

I am a qualified town planner with a Bachelor of Arts (Geography and Public Administration) from the University of Tasmania, and a Master's Degree in Town and Country Planning from Sydney University.

2.4 I am a Certified Practicing Planner.

2.5 I am a Fellow of the Planning Institute of Australia (formerly Royal Australian Planning Institute) and have served as its State Vice-President and President.

2.6 I have also served as a National Councillor for the Institute for five years and as its National Vice-President for two years.

2.7 Experience

I have 43 years' experience working as a planner in local government in New South Wales and Tasmania, including 10 years as Manager of Planning with Clarence City Council and 27 years in my own private consultancy.

2.8 I have appeared as an expert planning witness in relation to a broad range of planning related matters during my professional career in:

- The Land and Environment Court (NSW);
- NSW Magistrates Court;
- The Supreme Court of New South Wales;
- The Resource Management and Planning Appeal Tribunal (TAS), now Tasmanian Civil and Administrative Tribunal;
- The Supreme Court of Tasmania;
- The Magistrates Court of Tasmania;
- The Liquor Licencing Board Tasmania;
- The Resource Planning and Development Commission (TAS) and Tasmanian Planning Commission.

2.9 Specifically relevant experience

From 1995 to 1998 I was a Member of the Sullivans Cove Advisory Committee (**SCAC**) representing the Royal Australian Planning Institute (now Planning Institute of Australia). SCAC had oversight of the preparation of the *Sullivans Cove Planning Scheme 1997* and made recommendations to Hobart City Council in respect of individual proposals for planning permission within the Sullivans Cove area.

2.10 From January to March 2016 I was engaged by TasWater to advise on the impact of the *Sullivans Cove Planning Scheme 1997 Draft Amendment 2/2015 (draft amendment)* to the Macquarie Point Waste Water Treatment Plant. In March 2016 I subsequently gave expert evidence on behalf of TasWater to the Tasmanian Planning Commission's hearing into the draft

amendment.

2.11 A complete Curriculum Vitae is Appendix B

3. BRIEF

3.1 I have been requested by MinterEllison, lawyers on behalf of the Macquarie Point Development Corporation (**MPDC**) to undertake the following:

(a) review MinterEllison's letter of 26 November 2024 and the documents to which it refers;

(b) prepare an expert witness report (to be filed on a date to be confirmed) which:

(i) sets out my background and relevant expertise;

*(ii) reviews the background materials, including the Guidelines prepared by the Tasmanian Planning Commission (the **Commission**), Macquarie Point Multipurpose Stadium Summary Report and Appendices filed as part of MPDC's submission to the TPC;*

(iii) reviews other relevant documents, including the Sullivan's Cove Planning Scheme (1997);

*(iv) considers the Draft Integrated Assessment Report (**IAR**) prepared by the Commission and any representations relevant to my area of expertise and responds to any relevant issues raised;*

(v) considers the planning merits of the Project and forms an opinion as to whether it is worthy of approval having regard to the Act, the Guidelines and other relevant matters, including the applicable planning controls, policy framework and site context;

(vi) identifies all facts, matters and assumptions upon which my expert witness report proceeds;

(vii) identifies any documents or other materials I have been instructed to consider or take into account in prepare my evidence report, and the literature or other material used in preparing my expert witness report;

(viii) contains a summary of my opinion or opinions;

(ix) includes a statement identifying:

(A) any opinions which are provisional and why they are provisional (i.e. why such opinions have not been or cannot be fully researched); and

(B) any matters falling outside my expertise; and

(x) is in accordance with Commission Practice Note 14: Expert Evidence;

(c) appear and give expert evidence at the hearing (on a date to be confirmed);

(d) review any additional documents provided to me in association with this matter;

(e) attend meetings with MinterEllison, MPDC other experts, as necessary; and

(f) review and comment on other parties' expert evidence to the extent relevant to my area of expertise.

I have attempted at all times in preparing this Statement, to distinguish between matters of fact, professional opinion and submission.

4. BACKGROUND

4.1 Overview of the project

The MPDC has been tasked on behalf of the Crown in Right of Tasmania with developing a multipurpose stadium at Macquarie Point (the **project**). The scope of the project is to create a multi-purpose venue for professional sporting, entertainment, and community events.

4.2 Project of State Significance

The project has been declared a Project of State significance, by order (the **order**) of the Governor. The order was approved by both Houses of the Tasmanian Parliament on 8 November 2023 and took effect on 9 November 2023.

Under the Order, the project for a stadium to be developed includes:

- (a) a stadium that is suitable for a range of entertainment, sporting, cultural, corporate and community uses;
- (b) the related infrastructure and services necessary to support the stadium and its operations;
- (c) a public concourse adjacent to the stadium; and
- (d) any other facility or thing necessary, or convenient, for the implementation of the project.

A Ministerial Direction from the Premier dated 16 October 2023 (Appendix A) directs the Commission to undertake an integrated assessment of the Macquarie Point Multipurpose Stadium project (the proposed **project**), in accordance with the *State Policies and Projects Act 1993* (the **Act**). (source: TASMANIAN PLANNING COMMISSION, Guidelines - Macquarie Point Multipurpose Stadium Project of State Significance - February 2024)

4.3 Requirement for Integrated Assessment

The Commission must undertake an integrated assessment of the proposed project in accordance with Part 3 of the Act. Section 20(5) of the Act specifies that the integrated assessment by the Commission must:

- (a) seek to further the objectives set out in Schedule 1 of the Act;*
- (b) be undertaken in accordance with State Policies; and*
- (c) take into consideration the matters set out in any representations made following public exhibition of the draft integrated assessment report.*

4.4 Scope of Integrated Assessment

The Ministerial Direction requires the Commission to comply with the following requirements (subject to the terms of the Act):

1. The integrated assessment is to address the environmental, social, economic and community impacts of the proposed project.

2. As part of the integrated assessment, the Commission is to specifically consider the extent to which the proposed project:

- is consistent with and supports the urban renewal of the Macquarie Point site (as defined in the *Macquarie Point Development Corporation Act 2012*) as provided for in the Mac Point Precinct Plan prepared by the Macquarie Point Development Corporation established under section 5 of that Act;
- impacts on the surrounding area and uses; and
- could generate social, economic, and cultural benefits to the region and the State of Tasmania.

4.5 The order supplants the approval processes otherwise required by legislation concerning the use and development relevant to the proposed project under the Resource Management and Planning System of Tasmania, specifically:

- *Land Use Planning and Approvals Act 1993*;
- *Environmental Management and Pollution Control Act 1994*; and
- *Historic Cultural Heritage Act 1995*.

4.6 Section 20(2B) of the Act empowers the Commission to prepare and publicly exhibit guidelines to be followed in the preparation of reports to be presented to the Commission for the purposes of the integrated assessment. The reports will inform the Commission's integrated assessment.

The Ministerial Direction requires the Commission to prepare guidelines within four months of the Commission receiving the direction. Those guidelines were provided by the Commission on 16 February 2024. (op.cit pp 1-2)

In relation to the project the Ministerial Direction to the Commission also requires as part of the integrated assessment, consideration of the extent to which the project:

- is consistent with and supports urban renewal as provided for in the Macquarie Point Precinct Plan;
- impacts the surrounding area and uses; and
- could generate social, economic and cultural benefits the region and the State.

(op.cit.)

The Commission clarified the scope of 'integrated assessment' by email to MPDC on 22 January 2025 as follows:

The effect of the Act is to put other planning instruments aside, in favour of the more general formulation of 'environmental, social, economic and community issues'.

The following matters are relevant to the integrated assessment:

- *use, development, and works which are required;*

- *environmental, social, economic and community issues relevant to the project;*
- *the broad RMPS objectives and State Policies;*
- *matters in representations;*
- *the development of a stadium for a range of purposes which includes related infrastructure and services necessary to support its operation and any other facility or thing necessary, or convenient, for the implementation of the project; and*
- *the extent to which the project:*
 - *is consistent with and supports urban renewal as provided for in the Macquarie Point Precinct Plan;*
 - *impacts the surrounding area and uses; and*
 - *could generate social, economic and cultural benefits the region and the State.*

(op.cit. pp2-3)

4.7 Guidelines

The Commission prepared 'final guidelines' 16 February 2024.

The purpose of the final guidelines is stated as being consistent with section 20(2B) of the Act, ie:

to provide a framework to be followed '...in the preparation of reports to be provided to the Commission for the purposes of the integrated assessment' (op.cit.p.2).

The final guidelines set out the matters the Commission will consider when undertaking the integrated assessment of the proposed project. It is further stated that "reports to be provided to the Commission should address the matters in the final guidelines" (ibid).

Notwithstanding this, it is also stated that:

The final guidelines are not rigid criteria for the assessment of the proposed project. The issues 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 (ibid).

4.8 **Public comment**

Draft guidelines were exhibited for public comment from 4 December 2023 to 8 January 2024. The Commission invited comments in relation to the form and content of the draft guidelines from members of the public and any group or organisation, including the Proponent.

The comments were received and taken into consideration in the Commission's preparation of the final guidelines (ibid).

Section 22 of the Act requires the Commission to prepare a draft integrated assessment report (**draft IAR**) and to place that on public exhibition for not less than 28 days. The draft IAR was placed on exhibition on 31 March 2025, with the exhibition period ending on midnight 8th May 2025. In that period any person may make a representation. The Commission is required to consider each representation and to that end may hold a hearing in relation to each representation. Following consideration of representations the Commission may modify the draft report.

5. ASSESSMENT UNDER THE GUIDELINES

5.1 Site Description under the PoSS Order

The extent of the area subject to the Project of State Significance (**PoSS**) outlined in the Order of 16 October 2023 is described (in the Order) as:

...the area of land at Macquarie Point, bounded by a thick black line and identified as the Multipurpose Stadium and Associated Concourse Zone in the relevant plan, a reduced copy of which is set out, by way of illustration only, in Schedule 1.

Schedule 1 of the Order shows a copy of the 2024 Mac Point Precinct Plan with the Multipurpose Stadium and Associated Concourse Zone bounded in a thick black line (see Figure 1 below).



Figure 1: Schedule 1 from the State Policies and Projects (Project of State Significance) Order 2023 Statutory Rules 2023, No. 66

5.2 Site Description required under the Guidelines

Section 1.1.1 of the Guidelines requires identification of all use and development related to the proposed project, including any incidental or associated use and development (op.cit. p.1). This is stated to include all areas of land involving:

- the stadium building and uses within areas of the building;
- people entering or queuing to enter the stadium;
- open spaces associated with and to be delivered as part of the proposed project;
- movement ways and safe places for people to use in the event of an evacuation;

- parking, loading/unloading and manoeuvring areas for service vehicles;
- roads or access ways used by vehicles, pedestrians and cyclists moving between the stadium
- building and the existing public road network;
- pedestrian/cycle pathways or standing areas;
- use of public/mass transport;
- vehicle pick up and drop off areas;
- works or structures on existing road, pedestrian, cycle or public transport assets to cater for
- pedestrians, cyclists, altered traffic arrangements, mass/public transport vehicles; and
- utility services to be provided to the stadium.

(ibid)

5.3 Site Description provided in the PoSS Summary Report

The expanded area encompassing the broader scope of use and development is described in the Proponent's Project of State Significance (PoSS) Summary Report (the **Summary Report**) as:

- *Multipurpose Stadium and surrounding concourse, and arrival plaza areas.*
- *proposed relocated area for the Goods Shed to be integrated to the north of the Multipurpose Stadium, while remaining as a standalone structure and facility.*
- *practice cricket wickets which are required to service the multipurpose functionality of the facility.*

Approval is also sought for a below ground carpark located below the Antarctic Facilities Zone set out in the Mac Point Precinct Plan. The car park will be developed to support the broader precinct, with car parking to be used for operational and accessibility purposes to support the operations of the Multipurpose Stadium (op cit. MPDC, Macquarie Point Multipurpose Stadium Project of State Significance Summary Report, September 2024, Rev 01, p.11)

5.4 The Summary Report also describes additional development and use that are not dependent on the Project, but are included in the 2024 Mac Point Precinct Plan and are described as "pre-existing commitments":

- Northern Access Road;
- Antarctic Facilities Zone
- Residential Development and Public Foreshore Zone
- Aboriginal Culturally Informed Zone
- Complementary Integrated Mixed Use Zone
- Royal Engineers Building and Land.

(ibid)

- 5.5 Figure 0-2 in the Summary Report (see Figure 2 below) shows an expanded “PoSS scope boundary” to include “ancillary stadium functions” such as access plazas, the relocated Goods Shed, and an underground car park.

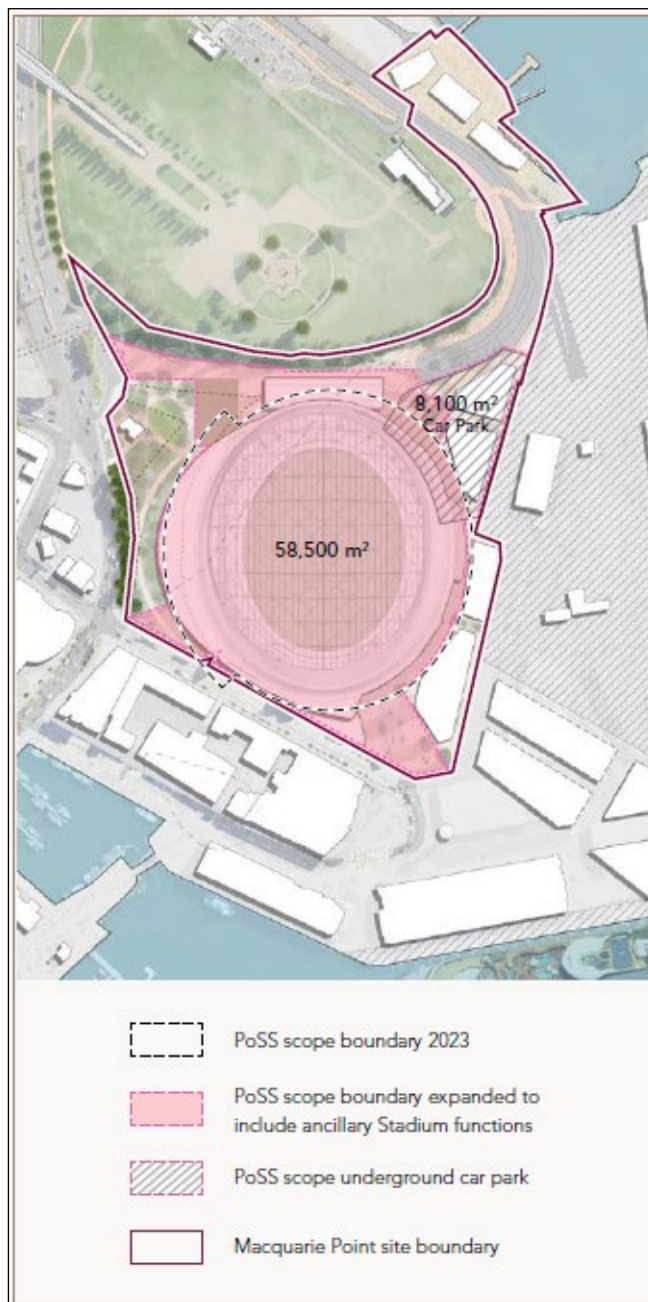


Figure 2: “site plan boundaries” described in the Summary Report.

5.6 **Site Description provided in the Ireneinc Planning Report**

In response to the Commission’s request for further information (RFI) the Proponent provided a Planning Report prepared by Ireneinc (February 2025)(**Planning Report**). In describing the site the Planning Report provides a comprehensive outline, referring to:

- Physical location;
- The defined site under the *Macquarie Point Development Corporation Act 2012*; and

- A 'zone of influence' referenced in Appendix I (Urban Design Framework p19) covering the scope of supporting works (as required under the Guidelines) (ibid. pp.13-14)

The zone of influence is described as including:

- the stadium entry plazas
- event bus mall and northern access road
- an underground car park in the north east of the precinct; and
- areas catering for infrastructure improvements.

(ibid)

5.7 Figure 9 in the Planning Report illustrates the area subject to the PoSS, the identified zone of influence and the extent of the broader Mac Point Precinct Masterplan (see below).

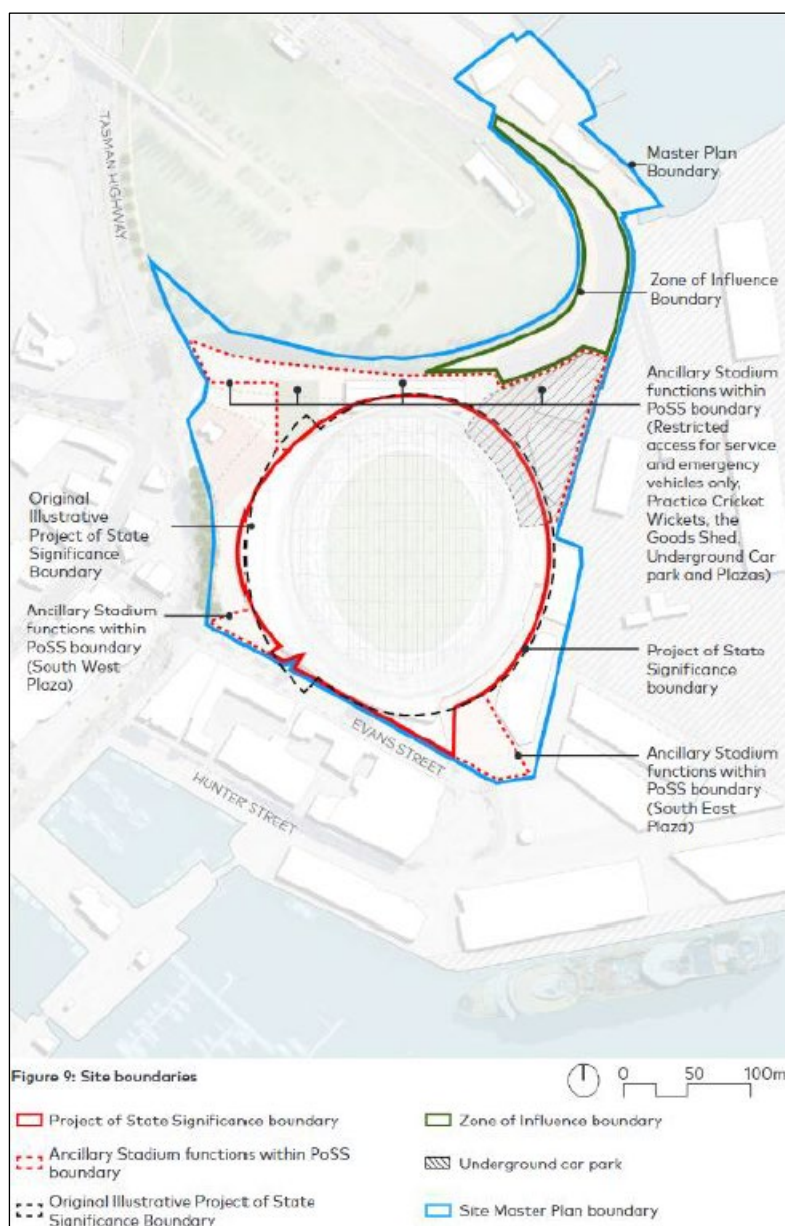


Figure 3: illustration of the site boundaries and 'zone of influence' (source: Ireneinc op cit. p.15)

5.8 Use and development beyond Mac Point site

The operation of the stadium will necessarily have implications outside both the broader PoSS site and the 'zone of influence' described in the Planning Report. The Guidelines require consideration of use and development related to the 'proposed project' which is defined as:

all use and development related to the project including any associated or incidental use and development (op.cit p29).

5.9 The area or land subject to this consideration is differentially described in the Guidelines as the 'adjacent area', 'broader area', 'locality', 'Macquarie Point site', and 'project site'. These terms are separately defined in the Glossary attached to the Guidelines (op.cit pp.28-29) as:

adjacent area: *means land that is near to, including adjoining, the project site.*

broader area: *land beyond the adjacent area or locality that is relevant to the issue being considered.*

Locality: *intermediary place between 'adjacent area' and 'broader area', which is directly related to the relevant issue being considered.*

Macquarie Point site: *means the land included with the definition of a site under (s.3(1) of) the Macquarie Point Development Corporation Act 2012:*

site means –

(a) the Macquarie Point land; and

(b) any Crown land, in proximity to the Macquarie Point land, that is transferred by the Minister to the Corporation for the purposes of this Act; and

(c) any land, in proximity to the Macquarie Point land, purchased by the Corporation for the purposes of this Act with the written approval of the Minister;

project site: *means the land on which any use or development is proposed (including any associated use or development), whether privately or publicly owned. If any such land is only part of the land comprised in any title, then the whole of that land is included.*

5.10 In section 1.2.1 of the Guidelines (Site description), the reports are required to provide plans and a description of 'the project site and its surrounds', including but not limited to:

Titles and ownership for:

- *the project site and the Macquarie Point site as well as land and title boundaries;*
- *the project site including any use and development outside of the Macquarie Point site;*
- *copy of the current folios of the Register for all of the project site;*
- *ownership of the project site and surrounding land;*

- *any rights-of-way, easements, covenants and other reservations affecting the project site and Macquarie Point site. (my emphasis added)*

(ibid. p2)

Services and access:

- *the location of all existing infrastructure assets and services on the project site, the Macquarie Point site and in the locality;*
- *existing vehicular, bicycle and pedestrian access to and access ways on the project site, the Macquarie Point site and the Macquarie Wharf site;*
- *any existing car parking and loading areas on the project site, Macquarie Point site and adjacent area; (my emphasis added)*

(ibid)

Existing physical properties:

- *plan of the project site and Macquarie Point site showing the location, building footprint and use of existing buildings and significant structures and open spaces within the project site, the Macquarie Point site and adjacent area;*
- *the building form, height and finishes of existing buildings on the project site, the Macquarie Point site and adjacent area;*
- *details of the geology and geomorphology of the project site and broader area and the nature, depth and engineering properties of the reclaimed land;*
- *existing areas of public open space in the broader area;*
- *existing vegetation types and ecological vegetation classes of the project site and adjacent area; and*
- *current aerial photography or mosaic at an appropriate scale showing the project site and the context of the broader area.*

(ibid)

5.11 Notwithstanding some degree of inconsistency or overlapping of the spatial scope provided by these requirements, it is my opinion that they provide a clear overall intent for the description of areas of potential use and development associated with the project, beyond the Macquarie Point site. This could include the surrounding street and pedestrian networks, transport infrastructure and public open space, such as the Tasman Highway, Davey and Macquarie Streets and Franklin Wharf. It is not clear from the Guidelines how to physically define the 'broader area' or the 'Locality' other than through assessment of the impact of 'issues'. The risk therefore is that the Proponent could either overly constrain the area of assessment resulting in potential inadequacies, or unnecessarily extend the area of assessment, resulting in skewed or over-generalised conclusions.

5.12 Appendix I (Urban Design Framework) provides information regarding:

Titles and ownership (pp18-22)

Services and access

- Infrastructure constraints (p23)
- Water pipes (p24)
- Sewerage pipes (p25)

- Stormwater and Drainage (p26)
- Telecommunications and Electricity Infrastructure (p27)
- Gas Infrastructure (p28)
- Existing pedestrian and cycle access (p29)
- Existing Public Transport Access (p30)
- Existing Transport Access (vehicle parking, loading zones – p31)

Existing physical properties

- Existing buildings and significant structures (p32)
- Existing built form height, massing and finishes (p33)
- Existing topography and contours (p34)
- The hydrology of the Site including any water bodies, waterways, catchments and natural drainage lines on or adjacent to or impacted by the project site (p35)
- Existing geology and geomorphology (p36)
- Areas of public open space (p37)
- Existing vegetation types and ecological vegetation classes (pp38-39)
- Existing aerial photograph of project site (p40)

- 5.13 All of the abovementioned descriptions go well beyond the defined PoSS site, the ‘zone of influence’ and the Macquarie Point site to include areas of the Domain, Macquarie Wharves, the CBD, and Sullivans Cove as far as Elizabeth Street Pier.

The Planning Report cross-references Appendix I (Urban Design Framework) at page 7.

- 5.14 The Planning Report also cross-references Appendix GG (Site Development Plan (2024)) at page 7. The Site Development Plan (the **2024 Site Development Plan**) provides a broad consideration across Sullivans Cove and the edge of the CBD in respect of:

- Activity and use (pp11-15 and 53-54)
- Movement and access (pp16-17 and 54-55)
- Cultural Heritage (p18 and 55)
- Landscape character (p19 and 56)
- Spatial form (pp20-35 and 56-62)
- Views and view corridors (p36)

- 5.15 **The proposed use and development** (Guidelines)

Section 1.3.1 of the Guidelines sets out the required documentation for the proposed use and development, distinguishing between ‘Use’, ‘Development’ and ‘Transport’.

‘Use’ includes:

- The proposed use of land and buildings;
- All activities related to each use;
- a description of ancillary activities and services that are integral to and dependent upon a use;
- the area for the buildings and site that are to be used and the activities that occur in these areas;
- the number of people (visitors and staff) that are using the building/site;

- the timeframes or operating periods proposed for each use or activity;
- details and plans of the pathways and areas where people will congregate or queue, including in an emergency evacuation event.
(op.cit p3)

‘Development’ includes:

- the location, building footprint, floor plan layout and purpose of proposed buildings and associated open areas, access points, interfaces and landscaping;
- the building form, height, detailing and finishes of proposed buildings and works;
- elevations and cross-sections of proposed buildings, including the relationship of the maximum elevations to existing ground level;
- any demolition requirements and plans including details for the removal or relocation of any utility services;
- details of connections to utility services and the capacity of these services;
- details and plans of any proposed cut or fill;
- details and plans of any proposed public art, including the proposed public art procurement strategy and management approach;
- 3D digital rendering of the proposed project in context.
(ibid)

‘Transport’ includes:

- plans of any new transport infrastructure to accommodate pedestrians cyclists, vehicles and mass/public transport services;
- 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;
- plans of any proposed vehicular and pedestrian access, roads and footpaths associated with the development, both within and outside of the project area; and
- plans of proposed access arrangements for service vehicles, loading/manoeuvring areas, car/vehicle parking or queuing areas within or outside of the building footprint.
(ibid. p4)

5.16 **Proposed use and development** (Planning Report response)

The Planning Report provides an outline on pages 25-26 as follows:

- the overall intent for the stadium to provide “not only sporting opportunities (with AFL as the anchor) but a contemporary events venue, attracting arts, entertainment, cultural, commercial and community events, offering the opportunity to attract and host events at a scale not currently available in the state, including events during off-peak periods”.
- Capacity;
- Area;
- Basic design concept;
- Building heights;
- Operational strata;
- Landscaping.

(op. cit)

The extent of the works considered as part of the PoSS are stated in the Planning Report as being:

- The Stadium – in general terms this involves an all-weather, roofed multipurpose stadium with a seating capacity of 23,000 and standing room for 1,500 patrons for major sports events and a 31,500 patron capacity for major concert events;
- An external concourse zone;
- Arrival plazas in front of the four Entry Gates;
- Outdoor cricket wickets adjoining the Stadium;
- Underground car park comprising approximately 536 car spaces;
- Relocation and integration of the heritage Railway Goods Shed (the **Goods Shed**) with the Stadium; and
- Relocation of the 'Red Shed' (the **Red Shed**) to an as-yet-undetermined location.
- As outlined in the Stadium Design Description, the external concourse and arrival plazas associated with the Stadium provide circulation space for the safe movement of large numbers of people.

(ibid. pp25-26)

5.17 ***Proposed Use***

The proposed uses are detailed in the Planning Report as:

Sports and Recreation (AFL, AFLW, Cricket, NRL, Rugby Union, Football/Soccer) (p26);

Community meeting, events and entertainment (concerts, trade shows, business conferences, business functions, private functions, training exercises) (p27);

Business and administration (office space for Stadiums Tasmania) (p27);

Food services, general retail and hotel industry (retail outlets, food and Beverage outlets) (p27);

Passive recreation in the new surrounding public open spaces (p28);

Associated components and activities (administrative offices for users of the stadium, stadium tours, external caterers, fitness/leisure club, car parking) (p28).

5.18 ***Operational details relating to use***

The differential capacity for sporting events, major concert events, day-to-day operation and maintenance is outlined on page 28 of the Planning Report, cross-referenced to:

- Chapter 1 of the Summary Report;
- Appendix B – Stadium Design Description;
- Appendix J - Urban Design Framework Report; and
- Appendix N – Transport Study

The Planning Report states that:

There are no proposed restrictions on operational timeframes and periods at this stage.

Sporting, community and entertainment events will depend on fixturing and scheduling, and the commercial deals entered into for venue hiring rights... (ibid. p29)

Notwithstanding this, an outline of the likely scope for operating periods is provided for:

- Sporting events;
- Entertainment events;
- Conference and business events;
- Community events;
- Business and administration; and
- Food services, bars and retail
(ibid)

5.19 ***Proposed development (buildings and works)***

Details of the proposed development are provided in the following documentation:

- Summary Report, Chapters 1, 2 and 6;
- Appendix A (Architectural Drawings);
- Appendix B (Stadium Design Description;
- Appendix D (Cut and Fill);
- Appendix I (Urban Design Framework);
- Appendix L (Historic Cultural Heritage Impact Assessment)
- Appendix N (Transport Study); and
- Appendix BB (Services Report/Infrastructure Strategy).

5.20 The Planning Report provides a collation of the proposed buildings and works as follows:

Stadium and concourse – at Field Level (team facilities, catering, administration and management areas, waste management, outdoor practice wickets, stage and concert loading areas, press room, pedestrian Gates 1 and 2, service ramp and internal service road) (op cit. p30);

at Ground Level and Level 1 (pedestrian Gates 3 and 4, food and beverage, catering and toilet facilities, access concourse and first seating tiers, premium/box areas, mechanical plant/services, camera decks, mezzanine areas including a viewing terrace between Level 1 and level 2 seating areas (ibid);

at Level 2 (Members Club function spaces, suites and boxes, bars and catering areas, toilet facilities, concourse seating, radio/tv broadcast and studio areas with associated function space (ibid. pp30-31);

at Level 3 (media facilities, coaching boxes, lounge area and toilet facilities) (ibid. p31);

at roof level (roof structure, lighting infrastructure, service rig and plant deck) (ibid);

Northern (Basement) Car Park - an area of 8,100m², with three (3) basement levels providing a total of 532 spaces, including up to one hundred (100) DDA capable spaces. Basement Level 3 will have a finished floor level approximately 3.3m below sea-level, requiring an excavation depth of up to 11m (ibid).

Site Demolition/Relocation Works - The Goods Shed is to be relocated and incorporated into the northern portion of the stadium, serving as new gathering space for Stadium related

events/activities, such as those outlined in the preceding sections. The Red Shed is proposed to be relocated for future uses (ibid). A specific location and purpose is not disclosed.

The Planning Report cross-references Chapters 1 and 6 of the Summary Report, and Appendix L (Historic Cultural Heritage Impact Assessment) in respect of heritage aspects and impacts on the Goods Shed and the Red Shed (ibid).

5.21 **Supporting and Enabling Projects**

A number of projects are outlined as being significant 'enabling' projects that will require completion/implementation prior to the first operation of the Stadium, and other 'supporting' projects that are recommended for implementation, to assist ongoing use of the Stadium and broader transport network.

Examples that are provided for 'enabling' projects include:

- Transport related upgrades, to improve capacity and safety within the transport network (new access road, footpath upgrades, bus plaza etc).
- Service infrastructure provision / upgrades (water, sewer, electricity etc). (ibid. p32)

The Planning Report cross-references Chapter 1 of the Summary Report, Appendix N (Transport Study) and Appendix BB (Services Report/Infrastructure Strategy) for detail of these projects (ibid).

The role of these projects is seen as significant (to varying degrees) in integrating the Stadium and associated uses with the Port, Sullivans Cove and the city overall.

5.22 **Policy, strategy and legislative context**

5.23 **State Policies and Projects Act 1993**

The *State Policies and Projects Act 1993* (the **Act**) contains the requirements for the integrated assessment of the Project, which include:

- seeking to further the objectives set out in Schedule 1 of the Act (the objectives of the Resource Management and Planning System of Tasmania); and
- being undertaken in accordance with State Policies.

Of particular significance is that section 19(1) of the Act states that in the case of a declared PoSS:

...the provisions of any Act, planning scheme or interim order –

- (a) requiring the approval, consent or permission of any person in connection with any use or development to which the order relates; or*
- (b) empowering any body to grant or refuse its consent to any such use or development; or*
- (c) prohibiting any such use or development; or*

(d) permitting any such use or development only upon specified terms or conditions; or

(e) regulating or permitting the regulation of any such use or development –

do not apply unless the order has been revoked.

The practical effect of declaring a PoSS is to remove it from consideration under the provisions of any Act, planning scheme or interim order. I infer from that the provisions of any Act, the *Sullivans Cove Planning Scheme 1997*, the *Hobart Interim Planning Scheme 2015* and the draft *Tasmanian Planning Scheme – Hobart* should not be given determining weight when assessing the PoSS.

5.24 Notwithstanding this, the Guidelines require an outline of relevant objectives, principles and process from the Resource Management and Planning System (**RMPS**) Acts related to the assessment of applications for permits for use and development under:

- the *Land Use Planning and Approvals Act 1993* (**LUPAA**);
- the *Environmental Management and Pollution Control Act 1993* (**EMPCA**); and
- the *Historic Cultural Heritage Act 1995* (the **HCH Act**).

5.25 The reports are required to provide an outline of relevant objectives of and outcomes to be achieved under these Acts, with reference to:

- parts B and C of the *Sullivans Cove Planning Scheme 1997* (**SCPS**), the *Hobart Interim Planning Scheme 2015* (**HIPS**) and the draft *Hobart Local Provisions Schedule* of the *Tasmanian Planning Scheme* (**draft LPS**);
- the Objectives and Principles of the *Sullivans Cove Planning Review 1991* (**SCPR**);
- codes and guidelines related to planning schemes, including relevant Australian Standards and any referenced, applied, adopted or incorporated documents in the SCPS, HIPS and the draft LPS;
- principles, codes or guidelines related to assessments under EMPCA; and
- registers and inventories of places of cultural significance under the HCH Act.

5.26 **RMPS Schedule 1 Objectives**

5.27 **Part 1 – Objectives of the System**

Part 1 of the RMPS Objectives are provided in Appendix C of the Guidelines, and repeated on page 34 of the Planning Report. For the sake of completeness, they are repeated below:

1. The objectives of the resource management and planning system of Tasmania are –

(a) to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity; and

(b) to provide for the fair, orderly and sustainable use and development of air, land and water; and

(c) to encourage public involvement in resource management and planning; and

(d) to facilitate economic development in accordance with the objectives set out in [paragraphs \(a\)](#) , [\(b\)](#) and [\(c\)](#) ; and

(e) to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.

2. In [clause 1 \(a\)](#), **sustainable development** means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety while –

(a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and

(c) avoiding, remedying or mitigating any adverse effects of activities on the environment.

The Part 1 objectives are broadly related to the overall purpose of the RMPS and are enacted through the suite of legislation and statutory policies that have been adopted under that system. The Part 1 objectives do not require an assessment of the individual merits of the PoSS, but rather whether the documentation provided in support of the PoSS allows for an assessment that is consistent with the objectives provided.

The Summary Report asserts at page 70 that the Summary Report “as a package directly responds to the broad objectives of the RMPS” (op.cit). More specifically, the Summary Report provides summary responses in Chapter 3, notably under the heading ‘Macquarie Point Planning Background’ (ibid. pp90-93), and cross-references Chapter 6 (Culture and Heritage), Appendix I (Urban Design Framework), Appendix GG (2024 Site Development Plan) and Appendix JJ (Mac Point Precinct Plan). Together with the raft of expert consultant reports listed on page 71 of the Summary Report I conclude that documentation provided in support of the PoSS fulfills the intent of Part 1 of the RMPS Schedule 1 objectives by providing the necessary information to assess the project.

5.28 **Part 2 – Objectives of the Planning Process Established by this Act**

The Part 2 objectives of the planning process established by the Act are in support of the objectives set out in Part 1 of Schedule 1 (above). These are addressed on pages 72 to 73 of the Summary Report and are augmented on pages 35-37 of the Planning Report. I address them as follows:

(a) to require sound strategic planning and co-ordinated action by State and local government; and

(b) to establish a system of planning instruments to be the principal way of setting objectives, policies and controls for the use, development and protection of land;

The RMPS is a suite of legislation including LUPAA, which provides for the establishment of local and state-wide planning schemes to control land use planning and development in Tasmania. The SCPS is the relevant local planning scheme covering Sullivans Cove including the project site.

Notwithstanding this, under the PoSS process the Guidelines replace the use and development standards that would otherwise apply under the SCPS, whilst still ensuring the above objectives are achieved.

(c) to ensure that the effects on the environment are considered and provide for explicit consideration of social and economic effects when decisions are made about the use and development of land; and

(d) to require land use and development planning and policy to be easily integrated with environmental, social, economic, conservation and resource management policies at State, regional and municipal levels;

The Planning Report states:

The Project is accompanied by a range of expert consultant reports which give specific consideration to the social and economic effects and benefits of the project, along with consideration of the relevant environmental, conservation and resource management policies at State, regional and municipal levels that are incorporated into the RMPS.

By addressing these matters, the Project demonstrates that all relevant environmental, social and economic effects and benefits have been considered to enable the appropriate use and development of the site.

(op.cit. p35)

To the extent of my expertise, I concur with that assessment.

(e) to provide for the consolidation of approvals for land use or development and related matters, and to co-ordinate planning approvals with related approvals;

The PoSS process provides for an integrated assessment that includes all aspects of the proposed stadium and public concourse, associated uses and events, related infrastructure and services and any other facilities necessary, or convenient, for the implementation of the project. This process provides for the consolidation and coordination of approvals.

(f) to promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation;

The project provides for a range of use and activities within a bespoke environment. The fundamental purpose of the project is to create a pleasant, efficient and safe environment for working, living and recreation through the provision of new public spaces, connections and infrastructure to support the stadium, future development zones and the broader community. This includes planning for, and provision of public access (including public transport facilities and upgrades).

The Planning Report notes that the planning and design of the Project and broader Mac Point Precinct Masterplan (2024) has been guided by a range of sustainability criteria informed by the Green Star Communities accreditation, facilitated by the Green Star Building Council of Australia (GBCA) (ibid.p36). The Green Star accreditation is a recognized industry-leading sustainability rating tool in Australia, which aims to reduce the impact of urban development on ecosystems and encourages resource management and efficiency by promoting infrastructure, transport, and buildings, with reduced ecological footprints (ibid).

MPDC is pursuing a whole-of-precinct Green Star accreditation, focussing on the following key outcomes for the project:

- *Governance: an independent design review of the site planning and layout and urban design, development of a climate adaptation and community resilience strategy,*

community participation and governance in the management of the precinct and robust construction environmental management.

- *Liveability: a precinct design that supports healthy and active living including active transport options and recreational facilities, community development via community groups, events, and sharing of information, third party sustainability certification for buildings within the precinct, understanding and interpreting culture, heritage and identity within the precinct design and operation.*
- *Transport: Provision of sustainable transport options including connections with planned rapid bus network, ferry network and provision of bike and other parking and charging facilities.*
- *Economic Prosperity: investment in community infrastructure, return on investment studies to inform development including the analysis of both direct and indirect costs and benefits.*
- *Environment: integrated water cycle approach, greenhouse gas emissions strategy, sustainable transport and movement, best practice waste management in construction and operation, reduced heat island effect. Improvement of site biodiversity and ecological values, construction and operational waste management solutions to reduce waste streams.*
- *Contribution to skills and learning: support for broad skills development programs as part of construction and provision of sustainability education opportunities across site from design through to construction and operation.*
- *Infrastructure: Development is to provide efficient and effective supporting infrastructure, including community digital infrastructure. Enable reduction in peak energy levels through energy efficient building and engineering systems design, stormwater discharge management, efficient lighting solutions.*
- *Innovation: Use of innovative decontamination strategies to provide ultimate environmental outcomes. Design and implementation of Tasmania's first District Infrastructure Scheme.*

(ibid. pp36-37)

By implementing these initiatives the project will promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation.

(g) to conserve those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value;

The project will provide new public spaces, connections and infrastructure to support the stadium and future development zones in the precinct. As such the project has the potential to promote a pleasant, efficient and safe environment for working, living and recreation for the broader community, particularly through the delivery of the Green Star outcomes listed above.

Investigations have been undertaken to identify Aboriginal and European historic archaeology and outline measures to conserve this history in-situ. The project's implementation will include elements that recognise the original shoreline and development of the site over time, together with the cultural significance of the site and surrounding area. References to the historic use of the site for rail and freight activities are provided in respect of the Railway

Roundhouse (vis. the shape of the stadium), the Goods Shed through its relocation and re-use, and the Red Shed's storage or relocation rather than demolition.

(h) to protect public infrastructure and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community;

The Planning Report states:

The provision of new public infrastructure and the integration of existing infrastructure has been carefully considered as part of the PoSS. This includes a detailed physical infrastructure strategy, outlining requirements for water, sewer, electricity and stormwater assets, along with planned integration of existing public movement corridors, streets and public open space with the project.

(ibid. p37)

To the extent of my expertise, I concur with that assessment.

(i) to provide a planning framework which fully considers land capability.

The Guidelines provide a planning framework, to enable a comprehensive assessment of the PoSS.

5.29 **State Coastal Policy 1996**

The Project site and surrounding area are within the 'coastal zone' as defined within the *State Coastal Policy 1996* (the **SCP**). The SCP therefore applies.

Three main Principles guide the SCP:

- *Natural and cultural values of the coast shall be protected.*
- *The coast shall be used and developed in a sustainable manner.*
- *Integrated management and protection of the coastal zone is a shared responsibility* (op.cit p5)

A range of desired 'Outcomes' are specified in the SCP to deliver these Principles in relation to the following subject areas:

1. Protection of Natural and Cultural Values of the Coastal Zone

1.1 Natural Resources and Ecosystems

1.2 Cultural and Historic Resources

1.3 Cultural Heritage

1.4 Coastal Hazards

2. Sustainable Development of Coastal Areas and Resources

2.1 Coastal Uses and Development

2.2 Marine Farming

2.3 Tourism

2.4 Urban and Residential Development

2.5 Transport

2.6 Public Access and Safety

2.7 Public Land

2.8 Recreation

3. Shared Responsibility for Integrated Management of Coastal Areas and Resources

3.1 Shared Responsibility for Management

3.2 Institutional Arrangements

3.3 Public Participation and Information

The Principals and Outcomes of the policy are required to be implemented through State and local planning schemes, and it is therefore assumed that every planning scheme prepared since the SCP came into force is consistent with the SCP, including the current controls for Macquarie Point under the SCPS that stem from the Macquarie Point Reset Masterplan.

The PoSS does not align with the current controls for Macquarie Point under the SCPS. Accordingly, should the PoSS be approved, amendments will be required to the SCPS or the foreshadowed Hobart LPS.

The proposal is considered to be consistent with the Principles of the SCP. As stated in the Planning Report:

As an urban site, remnant natural values have been considered, together with coastal impacts and sea level rise.

As a partially reclaimed site, the importance of the original shoreline to the traditional and original owners of the land, the muwinina people, has been considered as part of the Precinct Plan, which includes an Aboriginal Culturally Informed Zone and is part of the current and ongoing consultation with the Tasmanian Aboriginal community. It has also informed the design cues of the Multipurpose Stadium.

The Project recognises the importance of providing public access to coastal areas, which will be enhanced through the provision of additional public recreation space within proximity of the coast and the development of the Residential and Public Foreshore Zone, which forms part of the broader Mac Point Precinct Masterplan.

The Project also acknowledges existing and future industries that rely upon access to the coast and ensures such industries are not impacted nor disadvantaged.

(op.cit pp38-39)

To the extent of my expertise, I concur with that assessment.

More specialised responses to the SCP, including water quality management, natural values, coastal inundation, sustainability, urban design and heritage are provided in the following sections of the PoSS Summary Report and supporting consultant reports:

- PoSS Summary Report
 - Chapter 2 – Landscape and Urban form
 - Chapter 7 – Environmental quality and hazards
- Appendix S – Water Quality and Management
- Appendix R – Natural Values Assessment
- Appendix U – Coastal Inundation Assessment
- Appendix I – Urban Design Framework
- Appendix L – Historical Cultural Heritage Impact Assessment

5.30 **State Policy on Water Quality Management 1997**

The State Policy on Water Quality Management (**SPWQM**) applies to all surface waters, including coastal waters and groundwater. The purpose of the Policy is as follows:

To achieve the sustainable management of Tasmania's surface water and groundwater resources by protecting or enhancing their qualities while allowing for sustainable development in accordance with the objectives of Tasmania's Resource Management and Planning System.

(op. cit s.5.1)

The Policy sets a range of objectives for determining and protecting environmental values and water quality.

Within the context of those objectives, desired 'Outcomes' or actions to achieve the objectives are specified in relation to the following subject areas:

- Measures to achieve policy objectives;
- Management of point sources of pollution;
- Avoiding discharges;
- Setting emission limits for discharges to surface waters;
- Setting limits for discharges to groundwaters;
- General operational matters;
- Management of diffuse sources of pollution; and
- Monitoring.

As with the SCP, the objectives and outcomes of the SPWQM are generally implemented through planning schemes and more specifically (in the case of the SPWQM) the *Urban Drainage Act 2013*. As the PoSS process replaces the normal assessment pathways, the objectives and requirements of the policy are reflected in the Integrated Assessment Guidelines.

Whilst the Planning Report cross-references Appendix S (Water Quality and Management) and Appendix BB (Utility Services Report) as addressing SPWQM and water quality management overall through a Stormwater Management Plan, it also highlights the use of Water Sensitive Urban Design (WSUD) to achieve the stormwater quality and quantity targets set out in the Tasmanian State Stormwater Strategy 2010 for suspended solids, phosphorus and nitrogen through Primary, Secondary and Tertiary methods of treatment (ENVIRONMENTAL PROTECTION AUTHORITY, TASMANIA, p20):

As a large proportion of the site will be comprised of hardstand and roofed surfaces, the above treatment methods will be achieved utilising Gross Pollutant Traps, which capture debris before it enters waterways and biofiltration systems, such as landscaped areas with appropriate soil depths and plantings to filter and absorb water runoff.

(IRENEINC op.cit pp39-40)

5.31 **National Environment Protection Measures 1999**

National Environment Protection Measures (NEPMs) are statutory instruments that specify national standards for a variety of environmental issues. They are also taken to be State Policies in Tasmania. (TASMANIAN GOVERNMENT, DEPT OF PREMIER & CABINET Website, 10 March 2025).

The current NEPMs provide guidelines on assessment of the following environmental matters:

- Air Toxics
- Ambient Air Quality
- Assessment of Site Contamination
- Diesel Vehicle Emissions
- Movement of Controlled Waste between States and Territories
- National Pollutant Inventory; and
- Used Packaging Materials

The following expert reports have been provided addressing the relevant issues raised by the NEPMs:

- Appendix T (Solid Waste and Hazardous Material Management);
- Appendix V (Site Remediation Strategy);
- Appendix AA (Construction Management Plan);
- Appendix LL (Site Environment Management Plan);
- TETRA TECH COFFEY, Environmental Auditor Opinion - Remediation Approach, 30 January 2025.

5.32 **Land Use Planning and Approvals Act 1993**

The *Land Use Planning and Approvals Act 1993* (LUPAA) provides for the statutory control of use and development across Tasmania and is the primary legislation under which local and state planning schemes are implemented. These include the *Hobart Interim Planning Scheme 2015* (HIPS), *Sullivans Cove Planning Scheme 1997* (SCPS) and the foreshadowed *Hobart Local Provisions Schedule* (LPS) of the *Tasmanian Planning Scheme*.

LUPAA forms part of the Resource Management and Planning System of Tasmania (RMPS), which implements the same overarching objectives outlined in Part 1, Schedule 1 to all legislation under the RMPS 'umbrella'.

Consideration of these documents is provided in section 5 of this report.

5.33 **Environmental Management & Pollution Control Act 1993**

The *Environmental Management and Pollution Control Act 1994* (EMPCA) is the primary environmental protection and pollution control legislation in Tasmania. The Act seeks the prevention, reduction and remediation of environmental harm, with the focus on preventing environmental harm from pollution and waste.

EMPCA forms part of the RMPS, which implements the same overarching objectives outlined in Part 1, Schedule 1 to all legislation under the RMPS 'umbrella'.

Environmental management

s.4(1) of EMPCA promotes 'best practice environmental management' which is defined as:

...the management of the activity to achieve an ongoing minimization of the activity's environmental harm through cost-effective measures assessed against the current international and national standards applicable to the activity.

In determining the best practice environmental management of an activity, section 4(2) states that regard must be had to the following measures:

- (a) strategic planning by the person carrying out, or proposing to carry out, the activity;*
- (b) administrative systems implemented by the person, including staff training;*
- (c) public consultation carried out by the person;*
- (d) product and process design;*
- (e) waste prevention, treatment and disposal.*

In order to address these measures the Planning Report asserts that expert consultants have provided best practice environmental management input into the project design, specifically with regard to:

- Waste Management
- Water Management
- Site Remediation
- Stormwater Management; and
- Green Star requirements / Sustainability Objectives.

I am not qualified to assess the adequacy of the expert environmental reports that support the project but I note the following provision in respect of the above issues:

- Summary Report
 - Chapter 7 (Environmental quality and hazards)
 - Chapter 9 (Other planning matters)
- Appendix T (Solid Waste and Hazardous Material Management)
- Appendix S (Stormwater Management Plan)
- Appendix V (Site Remediation Strategy)
- Appendix Q (Noise and Vibration Assessment)
- Appendix AA (Construction Management Plan)
- Appendix LL (Site Environment Management Plan);
- TETRA TECH COFFEY, Environmental Auditor Opinion - Remediation Approach, 30 January 2025.

Environmental duties

Section 23A(1) of EMPCA states that:

A person must take such steps as are practicable or reasonable to prevent or minimise environmental harm or environmental nuisance caused, or likely to be caused, by an activity conducted by that person.

The project site has supported a number of activities requiring remediation in order to allow future use and prevent or minimise environmental harm or nuisance. One of the primary roles of the MPDC has been to remediate the site through the removal of contaminated material

(op.cit MPDC Act 2012, s.6(a)), and this has included the use of a specialist remediation consultant and independent environmental auditor. At the time of preparing this report it is my understanding that site remediation works have been substantially completed. The independent auditor has provided an interim report (dated 30 January 2025) which concludes:

- *The overall approach and process to remediation and management is reasonable.*
- *Full Site remediation, assessment and auditing has not been completed, and in particular has not been completed for the changed development scenario.*
- *At this time, there is no obvious impediment to the Site being able to be remediated, and residual contamination managed, in a way that allows the proposed development to occur.*
 - *It is possible that this interpretation may change based on new information or assessments to be completed.*
 - *Specific requirements in terms of remediation extents, investigations to support the conceptual site model, and associated timelines and costs that may be required to finalise environmental auditing cannot be pre-empted and are not the responsibility of the Environmental Auditor.*

(TETRA TECH COFFEY op.cit p7)

5.34 **Historic Cultural Heritage Act 1995**

The Historic Cultural Heritage Act 1995 (**HCH Act**) was developed to ensure the historic places that are of importance to the whole of Tasmania are recognised, protected, and managed effectively as part of the RMPS (TASMANIAN HERITAGE COUNCIL, Implementing Tasmania's *Historic Cultural Heritage Act 1995*, February 2020, p1).

The *Historic Cultural Heritage Amendment Bill 2019* was introduced and adopted to further integrate heritage legislation with LUPAA, as well as recognising the role of the Environmental Protection Agency (EPA) and the Tasmanian Planning Commission (The Commission) (ibid).

The HCH Act establishes the Tasmanian Heritage Register (THR) as an inventory of places of State significance; to recognise the importance of these places to Tasmania; and to establish mechanisms for their protection.

The HCH Act forms part of the RMPS, which implements the same overarching objectives outlined in Part 1, Schedule 1 to all legislation under the RMPS 'umbrella'.

The PoSS assessment pathway replaces the process otherwise required by legislation under the RMPS, including the HCH Act. Notwithstanding this, the requirements of the HCH Act have been utilised and are addressed in the following consultant reports:

- Summary Report:
 - Chapter 6 (Culture and Heritage)
- Appendix L (Historic Cultural Heritage Impact Assessment)
- Appendix M (Historical Archaeological Assessment, Archaeological Sensitivity Report and Archaeological Method Statement)
- Appendix HH (Pre-Stadium Cultural and Landscape Values Assessment)
- MPDC, Tasmanian Aboriginal Community Engagement – Aboriginal Culturally Informed Zone and Stadium – CHMA – August 2024

Following a request for further information (RFI) from the Commission, the following additional reports were provided:

- MPDC letter to the Tasmanian Planning Commission, 31 January 2025
- SOUTHERN ARCHAEOLOGY, draft Aboriginal Heritage Assessment Report (AHAR), 30 January 2025
- GJM HERITAGE PURCELL, RFI RESPONSE – Cultural Heritage and Values – Visual impacts, 17 February 2025

I am not qualified to comment on the heritage and archaeological assessments provided above. However, to the extent that the GJM Heritage Purcell, RFI Response dated 17 February 2025 provides an assessment of visual impacts (on heritage values), that RFI Response will inform my own assessment of visual impact later in this Statement.

5.35 **Governmental policy and strategy**

Section 2.2.1 of the Guidelines requires consideration of the following:

1. Agreements or undertakings between the 3 levels of government and other organisations relating to the project site, in the locality or in the broader area.
2. Plans and strategies related to the project site managed under the *Macquarie Point Corporation Act 2012*.
3. Plans and strategies related to the role of the City of Hobart across a range of relevant areas.
4. The policies and strategies or management plans/development related strategies for infrastructure owners and managers in the areas covering:
 - TasPort's operations at Macquarie Point and Franklin Wharf;
 - TasWater's strategies and plans related to the Macquarie Point wastewater treatment plant;
 - the Department of State Growth's policies and strategies related to transport and traffic infrastructure and management;
 - policies and strategies of the State Government or Renewables, Climate and Future Industries Tasmania, related to climate change and reduction of greenhouse gas emissions.

Section 2.2.2 of the Guidelines requires submission of a consolidated set of plans and maps showing the status and nature of governmental policies and strategies for the Macquarie Point site, the adjacent area, locality and broader area that are related to the stadium project.

These matters are addressed below.

5.36 ***Agreements between levels of government***

Hobart City Deal

The Hobart City Deal is a 10-year partnership between the Australian and Tasmanian Governments and the Clarence, Glenorchy, Hobart and Kingborough councils. The partnership aims to:

- *increase the use of public and active transport*
- *create urban renewal through compact, liveable and sustainable precincts*

- *deliver vibrant and liveable communities with access to green spaces, and supporting cultural and recreational facilities*
- *grow Greater Hobart's status as a global connected city.*

City Deal Partners are charged with delivering a broad package of infrastructure improvements and services to encourage changed transport habits, manage congestion, improve traffic flow and inform decision making in the Greater Hobart Region (TASMANIAN GOVERNMENT, Hobart City Deal website, October 2023) .

Specific implementation directions are described as:

- 1. Supporting the development of a direct international gateway at the Hobart Airport*
- 2. Gateway to the Antarctic and Southern Ocean*
- 3. Implementing the Greater Hobart Transport Vision*
- 4. Driving urban renewal and delivering affordable housing*
- 5. Activating the Northern Suburbs Transit Corridor*
- 6. Being a smart, liveable and investment ready City*
- 7. Collaborating and providing strategic governance by establishing and implementing a Greater Hobart Act*

(COMMONWEALTH OF AUSTRALIA, Hobart City Deal - Implementation Plan Update 2022)

From these directions, the projects identified in the City Deal Implementation Plan that are directly relevant to Macquarie Point and the PoSS are:

- a) realisation of an Antarctic and Science Precinct, which is expected to support the activation of Macquarie Point.
- b) Complete remediation activities, and progress investment and permanent development opportunities at Macquarie Point. Run a competitive bid process to engage a developer for The District parcel.
- c) Decommission the wastewater treatment plant at Macquarie Point.
- d) establish an Antarctic-focussed logistics wharf area and to support the implementation of its Master Plan.
- e) Continue the transformation of Macquarie Point into a Cultural and Arts hub.
- f) Commence construction of bus prioritisation measures in Davey and Macquarie Streets.
- g) Explore potential additional ferry routes.
- h) Test and explore emerging opportunities including:
 - Sporting codes, including active proposals and opportunities related to basketball, AFL and soccer
 - Cultural precincts, informed by the audit of the cultural facilities in the region, and the opportunity at Macquarie Point
 - Tourism opportunities, including festivals and good urban design including more active street levels to increase engagement.

The Project in terms of the stadium and external concourse, outdoor wickets, underground car parking, relocation of the Goods Shed and Red Shed, bus plaza, public spaces and associated

Northern Access Road, Antarctic Facilities Zone and Mixed Use Zone will assist in realising the following aspects of the City Deal Implementation Plan:

- (a) in respect of providing a potential Antarctic precinct as part of the 2024 Mac Point Precinct Plan;
- (b) Completing remediation of Macquarie Point;
- (c) The coincidental decommissioning of the wastewater treatment plant at Macquarie Point;
- (d) Facilitating access to an Antarctic-focussed logistics wharf area;
- (e) Continuing the transformation of Macquarie Point into a Cultural and Arts hub;
- (f) and (g) necessitating a review of public transport access in the locality, including buses and ferries;
- (h) providing active opportunities for: sporting codes, including AFL and soccer; cultural facilities at Macquarie Point; tourism opportunities, including festivals and urban design including active street levels to increase engagement.

Therefore, in both broad and certain specific terms the PoSS will either fulfill or facilitate many of the objectives and identified projects under the Hobart City Deal.

30 Year Greater Hobart Plan

The Greater Hobart Committee is established through the *Greater Hobart Act 2019* and includes Tasmanian and local government representatives. The Greater Hobart Plan seeks to spatially integrate transport, housing and precinct planning so as to allow planning for business and employment growth, recreation and environmental management, protect farmland and plan for climate change. In the short term, the Plan will be used to inform an update to the *Southern Tasmania Regional Land Use Strategy* (STRLUS). The Greater Hobart Plan is aligned with, and is designed to deliver, the 2050 Vision for Greater Hobart (GREATER HOBART COMMITTEE, September 2021) through the following themes:

Be greater for our people – a great place to live; safe and welcoming; better active transport; and contribute to health and wellbeing

Have greater interconnection, but distinct communities – continue to 'feel like Hobart'; connected to unique natural environment; thriving, unique neighbourhoods; and people centred, activated places

Have greater resilience – build resilience and disaster preparedness; strong local business community; adapt towards a low carbon economy; and community spirit to 'future-proof' the city

Be well planned – 'right place, right time'; collaborative approach to planning; and coordinated provision of infrastructure and services

Have greater connection – easy to get around; greater transport choice; increase co-location of jobs and housing; and smart technology to enhance useability

Plan for growth and change – greater housing choice; increase residential density in inner areas; growth will be planned and sequenced; and protect unique natural areas and biodiversity.

(GREATER HOBART COMMITTEE, 30-Year Greater Hobart Plan, August 2022, p2)

The Project and associated 2024 Precinct Masterplan is broadly consistent with these themes, adopting similar principals and criteria to guide the planning and design of the Project.

Keeping Hobart Moving – Transport Solutions for our Future

This State Government document outlines how over the next 10+ years, existing and future projects will deliver a transport system intended to create an “accessible, people-focused and future-ready city that enables economic prosperity and liveability” (STATE OF TASMANIA (Dept of State Growth), Keeping Hobart Moving - Transport Solutions for our Future (Draft), October 2023, Dept State Growth Website 2025).

The document includes a number of projects as part of Phase One, with planned implementation between 2023 and 2026. The most relevant to the PoSS include:

- Rapid Bus Network initiative;
- Macquarie and Davey Streets improvements;
- Eastern corridor - Tasman Highway transit lanes;
- Hobart Bus Transit Centre;
- Long term ferry contract (at planning stage) including additional ferry services, routes and terminals;
- Macquarie Point Northern Access Road (at planning stage)

Whilst the above projects are in various stages of planning, funding and delivery, all seek to improve access and availability of public transport and alternate modes of transport, to make such options more appealing to the commuters and the public in general and mitigate congestion.

The Planning Report cross references the Transport Study (Appendix N) accompany, and further analysis in Chapter 4 of the Summary Report (IRENEINC op cit. p49)

Tasmanian Antarctic Gateway Strategy 2022-2027

The Tasmanian Antarctic Gateway Strategy (the **Strategy**) is a State Government document that “recognises the substantial economic, employment, social and research opportunities for Tasmania from the Antarctic and Southern Ocean sector” (STATE OF TASMANIA (Dept of State Growth), Tasmanian Antarctic Gateway Strategy 2022–2027, November 2022, p7) .

The Strategy aims to:

- enhance Hobart’s standing as an international Antarctic and Southern Ocean science and research hub
- attract international Antarctic program visits to Tasmania
- attract additional Antarctic research investment and science collaboration to the state
- stimulate export and trade of Tasmanian polar, remote, and maritime products and services
- encourage and facilitate a collaborative approach to growing the sector

(ibid)

One of the Goals of the Strategy is to “invest in Tasmania’s Strategic Antarctic gateway infrastructure” (ibid. p8). Of relevance to the Project are the following actions for implementing the Strategy:

Action 1.1 - Support port upgrades in the Port of Hobart.

Action 1.2 - Work with Hobart City Deal partners to establish an Antarctic and Science Precinct at Macquarie Point.

(ibid. p9)

The 2024 Precinct Plan allocates space for this as part of the Antarctic Facilities Zone, which will complement the planned wharf upgrades to support Antarctic logistics at the adjacent Port.

5.37 **TasPorts Operations and Management**

Port Master Plan: The primary strategic document prepared by TasPorts outlines the strategic direction for all of the Tasmanian ports under its control. For Hobart the strategy is specified as being the creation of new cruise and Antarctic precincts, including:

- *(investment of) \$50-\$60 million to update Hobart's valuable working port facilities which sustain Tasmania's growing tourism and trade.*
- *The cruise precinct at Macquarie Wharf will provide additional berths for cruise vessels, allowing services to grow with demand.*
- *A new Antarctic precinct will support the Tasmanian Antarctic Gateway Strategy and attract further international programs.*
- *A larger berth for RSV Nuyina, Australia's latest ice breaker research vessel.*
- *Enhancing Sullivan's Cove as a visitor-friendly waterfront tourist destination.*

(TASPORTS, Port Master Plan 2018, website)

The information included on TasPorts' Port Master Plan website indicates an Antarctic Logistics Facility located at Macquarie Wharf No.6, which is the most northerly of the wharves, and closest to the proposed new North Access Road. The initiatives for the Port of Hobart were recognised in Infrastructure Australia's Priority List 2021 (ibid).

Macquarie Wharf Redevelopment: In October 2024, the Commonwealth Government announced a \$188 million contribution toward constructing the new Macquarie Wharf 6. This investment supports the delivery of critical infrastructure and ensures Hobart continues to serve as Australia's Antarctic gateway (ibid).

The Macquarie Wharf Redevelopment by TasPorts is now progressing with the launch in April 2025 of the Expressions of Interest (EOI) process to identify a design and construction partner for the Macquarie Wharf 6 upgrade.

TasPorts have indicated that the Macquarie Wharf Redevelopment will unfold in planned stages to support immediate and long-term goals, while maintaining ongoing port operations crucial to the state's economy:

***Stage 1** involves the redevelopment of Macquarie Wharf 6, including the construction of fit-for-purpose wharf infrastructure and new shore power capability to support the Australian Antarctic Program. Once complete, Macquarie 6 will become the permanent home of the RSV Nuyina, Australia's flagship Antarctic research vessel.*

***Stage 2** will see the redevelopment of the Macquarie Wharves 4 and 5, enhancing the port's capacity to meet rising operational demands in trade and tourism.*

(ibid)

The Planning Report notes that TasPorts is a member of the Mac Point Precinct Plan Project Steering Committee and has been part of the development of the (2024) Precinct Plan, including ensuring TasPorts current and future operating and development needs have been considered (op.cit p50).

5.38 ***TasWater Operations and Management***

TasWater currently has infrastructure on or near the Site, including the existing wastewater treatment plant (WWTP) in the vicinity of Macquarie Wharf No.6.

To facilitate future use/development to occur at Macquarie Point, an agreement was reached between TasWater and the State Government to replace the WWTP with a pumping station, with the former treatment functions to occur at an upgraded facility at Self's Point. These works are being undertaken by TasWater, with an expected completion by 2027.

As indicated in the Planning Report, "this agreement and scope of work pre-dates the proposed development of a Multipurpose Stadium on site, and is required for the redevelopment of the site more broadly" (ibid).

5.39 ***Hobart City Council***

In my opinion the list of Hobart City Council strategic and policy documents provided in the Planning Report (ibid. pp51-65) is exhaustive and for convenience I adopt them in the same order. Similarly, it is my opinion that the assessments provided for these documents in the Planning Report are comprehensive and generally accurate. Where my assessment varies, I attempt to clearly indicate the difference of opinion and the basis for that difference.

A Community Vision for Our Island Capital: the Community Vision (the **Vision**) document is an aspirational document that articulates "the kind of future Hobart communities would like to see, as expressed through vision community engagement" (CITY OF HOBART, A Community Vision for Our Island Capital (July 2018) p4).

The Vision does not talk about specific policies, budgets or projects, but seeks to guide and direct the City of Hobart's strategic plan, which outlines Council's priority actions from across the organisation over 10 years (ibid).

There is no specific mention of Macquarie Point or a visionary statement for its future other than an oblique reference celebrating Hobart's 'Antarctic Gateway' status.

The most significant outcome of the Vision is that it provides 8 'pillars' which each describe specific focus areas—specific ways of strategic thinking about Hobart. These pillars feed into and provide a structural context for the Capital City Strategic Plan 2023 (see below).

Capital City Strategic Plan: The Capital City Strategic Plan 2023 (the **Strategic Plan**) outlines the outcomes the City is aiming to achieve over a ten-year period in response to the community Vision. That Vision is outlined in the Council document A Community Vision for Our Island Capital (op cit) which provides 8 pillars of contextual focus for the Strategic Plan as follows:

Pillar 1 - Sense Of Place

Pillar 2 - Community Inclusion, Participation And Belonging

Pillar 3 - Creativity And Culture

Pillar 4 – City Economies

Pillar 5 – Movement And Connectivity

Pillar 6 – Natural Environment

Pillar 7 – Built Environment

Pillar 8 – Governance And Civic Involvement

For each pillar, a range of strategies are provided to guide implementation. The following are considered relevant to the Project.

Pillar 1:

- 1.1.1 Protect and enhance, core elements of Hobart identity – kunanyi / Mount Wellington, timtumili minanya / River Derwent, natural areas, green spaces and Hobart’s heritage, culture and human scale – so they continue to be valued as central features of Hobart’s landscape and social fabric.*
- 1.1.2 Create opportunities for people to connect to place and Country, supporting community activities, spiritual and cultural customs and practices.*
- 1.2.1 Celebrate and highlight the distinctiveness of Hobart’s character, and historical and cultural heritage.*
- 1.2.2 Ensure City place-making planning and initiatives embody civic pride by reflecting community values and the character of local neighbourhoods.*
- 1.2.5 Implement Urban Design and Public Realm Design guidelines for streetscapes and public spaces that are welcoming, high-quality, comfortable, vibrant, green accessible, inclusive and safe.*
- 1.2.6 Champion, encourage and acknowledge design excellence in the built environment.*

Comment: The project will not physically affect any of the core elements listed under strategy 1.1.1. There will be an impact on views to and from the River Derwent, particularly from and to the Cenotaph, from eastern approaches to the Tasman Bridge and from Rosny Hill/foreshore. The functional requirements of the stadium preclude the possibility of it being designed to a ‘human scale’, and its height will project above the natural landscape of the Domain in the locality of the Cenotaph. The extent to which these views and landscape attributes are valued need to be balanced against the level of community support and benefit in respect of the design and function of the stadium. The Project’s status as a PoSS allows consideration the overall economic cultural benefits to the community into the future.

Pillar 2:

- 2.1.1 Demonstrate leadership in Aboriginal social justice, wellbeing and inclusion in partnership with Aboriginal people.*
- 2.1.2 Highlight Tasmanian Aboriginal history and culture, including acknowledgment of the darkness of our shared experience, through interpretation, naming, arts and events.*

- 2.1.3 *Engage with Aboriginal people on how they want the City to work with them.*
- 2.3.1 *Provide diverse activities and programs that reduce social isolation and build social cohesion and improve health and wellbeing.*
- 2.3.2 *Provide and progressively enhance a range of accessible quality places, facilities and infrastructure that support healthy living and where people can enjoy social, education and recreation activities and events.*
- 2.3.3 *Provide diverse and accessible sporting and recreation facilities with neighbouring councils and the State Government.*

Comment: I note the Planning Report's comments in this respect:

The need to respond to the heritage, culture and natural environment in which the Stadium is located has been a core element of the design approach, whilst also ensuring the Stadium delivers on the promise to provide a multi-purpose facility that meets the needs of the community into the future.

The Project incorporates a range of sustainability criteria and guiding principals to conserve and enhance the natural environment, including the provision of new green spaces, best practice water management measures and use of sustainable materials in accordance with the 5-star Green Star accreditation.

As part of the broader strategic planning underway, the new Macquarie Point Precinct Plan seeks to support the urban renewal of the Mac Point site via the creation of five specific zones that are accessible to all people, offers vibrant experiences and destinations (op cit. p53).

Pillar 3:

- 3.4.2 *Activate public spaces and venues, to benefit the community and business sector through changes to infrastructure, public art, performances, events, festivals and markets.*

Comment: The Planning Report cross references Section 4 of the Summary Report in terms of the detail of proposed uses and also notes:

The multi-purpose stadium includes the concourse and immediate spaces in which the stadium fronts. The provision of ground level tenancies which open out to the concourse and outdoor spaces will provide activation of public spaces. Use of the external spaces will include opportunities to support public art, performances and markets (op cit.)

Pillar 4:

- 4.1.3 *Partner with local businesses, stakeholders and Government to develop capacity to transform toward a zero emissions and resilient city that can leverage circular economy practices.*
- 4.4.3 *Acknowledge, celebrate and leverage Hobart's position as a gateway to the Antarctic and Southern Ocean.*

4.4.6 *Continue to play a significant role in the visitor and tourism economy, and as the gateway city to Tasmania.*

Comment: The Planning Report relevantly notes:

The PoSS and broader development and implementation of the Macquarie Point Precinct Plan is being undertaken in collaboration with a wide-array of community organisations, the Tasmanian Aboriginal Community, statutory authorities, and the State Government. This will include ongoing discussions with the Australian Antarctic Division to deliver the future Antarctic Facilities Zone, leveraging Hobart's position as a key gateway to the Antarctic and Southern Ocean.

The proposed Stadium will serve as drawcard for visitors and promote additional economic activity and growth within Hobart. A detailed assessment of the economic and social benefits of the Stadium are outlined in the accompanying Economic Impact Assessment and Social and Cultural Analysis prepared by KPMG.

The ongoing development and delivery of each stage of the Mac Point Precinct Masterplan will also continue to complement and enhance the visitor and tourist economy (op cit.p54).

Pillar 5:

5.2.2 *Prioritise and promote opportunities for safe, accessible and integrated active transport.*

5.2.3 *Advocate for and promote the increased use of public transport.*

Comment: A key consideration for the PoSS is the provision of alternate transport modes, to reduce reliance upon private vehicles. This is a common goal across many of Hobart City Council documents. The Project will operate with dedicated bus services during events and facilitate the prioritisation of existing and improved pedestrian, bicycle and expanded ferry routes.

Pillar 6:

6.1.3 *Protect and enhance Hobart habitats, key natural assets and ecosystems, including wildlife corridors and waterways.*

6.2.4 *Engage with Tasmanian Aboriginal people to develop opportunities for undertaking and reflecting cultural practices and heritage in Hobart's bushland and public spaces.*

6.5.3 *Encourage opportunities to activate the City's open space network for events and activities.*

Comment: I concur with the Planning Report's assessment that:

The Precinct Plan includes significant areas that surround the Stadium and concourse. These spaces will support additional use/development forming part of the Precinct Plan, but will also include areas that will become part of the City's open space network.

This includes the Aboriginal Culturally Informed Zone in the north-eastern portion of the site, along with pedestrian pathways and connections from Evans Street (op cit.).

Pillar 7:

7.2.5 Embrace opportunities to ensure new developments and redevelopments contribute to and reflect Hobart history, heritage, culture and environment.

Comment: The Mac Point Precinct Plan incorporates a dedicated Aboriginal Culturally Informed Zone which is to be further planned and developed through ongoing consultation with the Tasmanian Aboriginal Community.

The European history of the Site is also considered, through:

- identification, conservation, and protection of historic archaeology across the site;
- reference to the location and curvilinear form of the Railway Roundhouse in the form of the stadium building;
- the adaptive re-use of the Goods Shed, retaining the heritage characteristics of the building and allowing for continued public interpretation;
- the retention and protection of the Royal Engineers Building;
- utilising setbacks to maintain curtilage around the Royal Engineers Building;
- utilising external materials that reference the history of the site and surrounding built/landscape elements that define the historic character of the Cove.

City Economy Strategy 2023-2028: The Strategy sets the vision and priorities aiming to position Hobart for future social and economic prosperity, enabling businesses and resident communities to “respond to and thrive from the challenges and opportunities that lie ahead”(CITY OF HOBART, City Economy Strategy 2023-2028, Website).

The strategy identifies planned development and growth opportunities that will assist in achieving the above, which includes the redevelopment of Macquarie Point and the future Antarctic zone (op cit. p12).

Stated strategic priorities that are relevant to the Project are:

1.2 Deliver initiatives that expand or enhance our night-time economy programs in the City

1.4 Partner with subject matter experts to understand and support the key catalysts that enable high impact and high value night-time economy activity

1.8 Advocate for additional infrastructure that supports our precinct plans and promotes increased public transport use and micro-mobility

1.9 Deliver neighbourhood, vision and structure plans across the city that accommodate population growth and support businesses

2.7 Advocate for the development of strategically important sites

3.2 Deliver Neighbourhood Precinct Plans

3.4 Advocate for infrastructure which is strategically important to the city and the region including cultural, transport and community infrastructure

3.5 Deliver programs to foster night-time economy, cultural and creative activity that enhances the visitor experience and supports business in the City

4.3 Partner with stakeholders to elevate our Antarctic gateway status as part of our urban identity and to realise the potential of being one of five Antarctic gateway cities globally

(ibid. pp14-15)

The Planning Report cross references the following relevant Project documentation:

- Summary Report
 - Chapter 5: Economic Social and Cultural Analysis
- Appendix H (Social and Cultural Assessment)
- Appendix F (Economic Impact Assessment)
- Appendix E (Cost-Benefit Analysis)

Central Hobart Plan: The Central Hobart Plan was endorsed by Hobart City Council in September 2023 (CITY OF HOBART, Central Hobart Plan Summary, October 2023).

The Central Hobart Plan is a 20-year plan outlining a vision for shaping Central Hobart and a set of objectives, strategies, and actions to achieve that vision. Notwithstanding the visionary characterisation of the Plan, it is characterised as a ‘Structure Plan’ identifying precincts and an ‘Urban Design Framework’ addressing the following:

- Building Form and Design (including building heights);
 - Street Wall Heights;
 - Street Activation and Interfaces;
 - Design Quality and Sustainability
 - Movement (pedestrian links)
 - Micromobility (cycling network);
 - Vehicle Access and Parking;
 - Public Transport;
 - Public Realm (amenity);
 - Green and blue network (tree cover, green space, public open space).
- (ibid)

The Plan applies to some areas of Sullivans Cove, including the Residential (Wapping) Precinct and former Gasworks, but does not cover Macquarie Point other than referring to it as part of a ‘Civic and Cultural Precinct (beyond the Plan area)’ (ibid. p12). The Proposed Pedestrian Access Plan (ibid. p20) and Proposed Cycling Network Plan (ibid. p21) nominate conceptual “future connections” to Macquarie Point.

Although intended to apply to the Central Hobart area covered by the Plan, the following descriptive statements are of general relevance to Macquarie Point:

- *The City Centre has remained low scale, retaining important vistas to the surrounding landscape and allowing historic landmarks, such as churches, to remain prominent.*
- *Existing buildings in Central Hobart are predominantly taller in the city’s inner core and reduce in scale and bulk as one moves down to the waterfront and up to the residential city fringes.*
- *Central Hobart is renowned for its human- scaled heritage fabric, a consolidated mid-century core and more recently a series of award-winning buildings, landscapes and open spaces.*

- *The urban amphitheatre of the broader region is ever present, and visual connections provide the backdrop for a dramatic and unique capital city experience, reinforced by deep views along the River Derwent.*
(ibid. p14)

Hobart: A City For All – Community Inclusion and Equity Framework: Hobart: A City For All is the City of Hobart's 'Community Inclusion and Equity Framework'. It outlines the City's role in "creating a city for all and provides a framework for action" (CITY OF HOBART, Hobart: A City For All – Community Inclusion and Equity Framework, 2021).

The Community Inclusion and Equity Framework (the **Framework**) has been designed to:

- *support and enhance the delivery of community outcomes across the organisation*
- *provide context about the role the City plays in creating a city for all*
- *provide background information on the challenges our community face*
- *outline our approach and tools for delivering outcomes.*
(ibid. p10)

The Framework flows directly from the community Vision (op cit.) and Strategic Plan (op cit.) with a focus on the outcomes under Pillar 2: Community inclusion, participation and belonging. These outcomes can be summarised as:

- *Truth and Reconciliation*
- *Participation and Access*
- *Wellbeing and Knowledge*
- *Safety and Resilience.*
(ibid)

The Framework is a high-level aspirational document that does not specifically mention a future for the Project site, Macquarie Point or Sullivans Cove. However, it provides a context for implementation of the Pillar 2 outcomes through various strategies.

The Mac Point Precinct Plan was guided by a community consultation process that is summarised in 'Part A: Background' of the Summary Report (op cit.) and includes precinct 'zones' that reflect Tasmanian Aboriginal culture, European heritage, economic and community uses, housing and transport connections and wayfinding to connect the city with the surrounding spaces.

Hobart Transport Strategy 2024: The Hobart Transport Strategy 2024 (the **Transport Strategy**) contributes to achieving the City of Hobart's community Vision. The Vision for Hobart's transport network over the next ten years aligns with Pillar 5, Movement and Connectivity. The themes of the Transport Strategy respond to this vision, focusing on transport choice.

Key priority actions for delivering choice are identified in respect of:

- Public Transport
- Bikes and micromobility
- Walking
- Driving
- Behaviour change
- Safe and healthy streets
- Climate ready transport

- Parking and kerbside management
(op cit. pp 14 and 116)

The Transport Strategy does not specifically mention a future for the Project site, Macquarie Point or Sullivans Cove. However, a Transport Study prepared in support of the Project (the **Transport Study**) aligns with the actions identified in the Transport Strategy, notably:

- *Establishing event-day bus services and associated plaza, providing direct links to surrounding Park and Ride Facilities.*
- *Integration and improvements to footpaths along Hunter Street and Evans Street, to improve pedestrian accessibility, safety and efficiency and manage the increased demand resulting from the PoSS.*
- *Establishing a Transport and Event Traffic Management Plan(s), providing a framework to manage a range of transport demands during events. This includes associated Parking Plans.*
- *Establishing an Event Travel Behaviour strategy, to encourage the use of alternate forms of transport to and from the Stadium during events.*
- *Integrating proposed pedestrian and active transport corridors into the existing network, including the Inner City Cycleway and State Government initiatives, such as the Rapid Bus Network.*
- *Collaboratively working with State Government and other key stakeholders to deliver the infrastructure and services identified in the Hobart City Deal.*
(op cit: Appendix N- Transport Study, p.xi; Summary Report Ch4; Planning Report p64)

As highlighted in the Planning Report, “the PoSS Transport Study is targeting 60-70% of all patron movements to and from the Multipurpose Stadium to be undertaken via alternate forms of transport (public transport, active transport and walking)” (ibid) (see also Appendix N, p.xi).

Inner Hobart Transport Network Operations Plan: To assist managing the City's transport network to achieve outcomes identified in the Transport Strategy, Central Hobart Plan, Hobart City Deal and other key strategic documents, the City of Hobart in conjunction with the Department of State Growth developed an Inner Hobart Transport Network Operations Plan (TNOP).

The TNOP's process combines strategic objectives, road user hierarchies, and place values to set a target minimum Level of Service (**LOS**) for each travel mode, providing a guide for planning operations (CITY OF HOBART and STATE OF TASMANIA (Dept of State Growth), Inner Hobart Transport Network Operations Plan, September 2023, p1).

In respect of Macquarie Point and the Project site TNOP identifies the following ‘Target Minimum Levels of Service’ per mode where A is highest and D is lowest. TNOP indicates that “in a highly urbanised environment such as the Hobart CBD, where there are many constraints in terms of road width, volume of activity and competing demands, it is not feasible to set a Target Minimum of LOS ‘A’ for any mode” (ibid. p16):

	Walking	Cycling (incl. scooters)	Bus	General Traffic (cars etc)	Freight
Tasman Highway	B	B	C	B	B
Evans St	C	C	D	D	C

Hunter St	B	Part B/ part C	D	D	D
McVilly Drive (incl potential Northern Access)	B	B	NA	NA	NA
Cenotaph (Anzac Pde)	B	B	NA	NA	NA

TNOP is a management rather than strategic tool and is acknowledged as requiring periodic review and updating (ibid. p2). Overall TNOP does not reflect any aspect of the PoSS, nor the freight potential of the Northern Access. It is therefore expected that the TNOP would be revised to address the spatial and operational impacts of the PoSS, the Antarctic Facilities Zone, and changes to transport logistics servicing the Macquarie Wharf port (freight) operations.

Parking – A Plan for The Future (2013): This strategic document was originally intended to guide and manage residential and commuter parking across the city, including both free and paid parking locations for the period 2012-2017.

The document included the provision of Park and Ride facilities within Greater Hobart, to reduce demand and overall commuter preferences for private vehicle use, and a specific action to support sustainable transport, including ongoing increases in parking fees for paid parking areas to discourage longer-term parking in inner-city areas.

The PoSS Transport Study, specifically considers the benefits arising from infrastructure / transport services proposed as part of the Project (such as the Event Bus), along with a range of recommendations to manage event related parking demands. This includes integrating event management and operations with supporting projects, including:

- an Event Parking Management Plan, which recommends event restrictions limiting the use of the Queens Domain for parking.
- Event Bus to Park and Ride facilities;
- ongoing development of additional Derwent ferry services; and
- the rapid bus initiative under the Hobart City Deal.

The Planning Report also points to the inclusion of an underground car park below the future Antarctic Facilities Zone, “to meet the private vehicular access requirements for the broader precinct” (op cit. p64).

Transport is addressed in the following documentation supporting the PoSS:

- Summary Report
 - Chapter 4 (Movement)
- Appendix N (Transport)

Sustainable Hobart Action Plan 2020-2025: The Sustainable Hobart Action Plan is a series of practical steps that aims to make Hobart a more sustainable city. The plan was developed in consultation with the community and external stakeholders. It outlines 42 projects over the next five years designed to complement the City’s other key strategies and plans, “which together seek to deliver sustainable and smart outcomes” (CITY OF HOBART, Sustainable Hobart Action Plan 2020-2025, December 2020, p8).

The projects focus on six major areas: Leadership, Mobility, Energy, Resilience, Waste, and Governance.

The Project will contribute to the following actions:

Mobility

- encouraging shared trips and transport options other than private cars through the PoSS Transport Strategy;
- make walking easier, quicker and more pleasant through the collection and sharing of data to guide the provision of new and/or upgraded pedestrian infrastructure across the City;
- The provision of new public spaces and pedestrian connections to existing spaces within the city, the Cove and Queens Domain.

Energy

- Following the MPDC sustainability pathway with Green Star Communities Accredited Professionals to work towards a whole of precinct accreditation with the Project aiming for a minimum 5 Star rating.

Waste

- management and minimisation
(op cit)

These matters are addressed in detail in the following project documents:

- Summary Report
 - Chapter 2 (Landscape and Urban Form)
 - Chapter 4 (Movement)
 - Chapter 5 (Environmental quality and hazards)
- Appendix B (Stadium Design Description)
- Appendix N (Transport Study)
- Appendix T (Waste Report))

Queens Domain Masterplan 2013-2033: The Queens Domain Masterplan (the **Domain Masterplan**) was created in 2013 to provide:

guidance about how to: create distinct high quality settings within the rich landscape of the site; unify a diverse history of singular developments; and make the Domain accessible in ways that have not been realised to date, all within the context of a respect for its natural and cultural values.

(HOBART CITY COUNCIL, Queens Domain Masterplan 2013-2033, p5)

The area covered by the Domain Masterplan does not extend to the proposed stadium but does include the area of the future Residential Development and Public Foreshore Zone at Regatta Point.



Figure 4: area of the Queens Domain Masterplan 2013-2033 (source: HOBART CITY COUNCIL op cit. p23)

The Domain Masterplan identifies the variety of use, development, management bodies and cultural values that affect the Domain Area and outlines various strategies to make the Domain 'one place of many'. The strategies that are relevant impact on Macquarie Point in the following ways:

Strategy 1: Establish and define the boundary landscaping of the Domain, including:

- Develop an urbanised foreshore edge at the Regatta Ground and Pavilion Point, including ramped and stepped access to the water, pedestrian promenades and shared paths, landscaping, quality street furniture and lighting.

The future Residential and Public Foreshore Zone shown below on an excerpt from the Mac Point Precinct Plan seeks to enable public activation and access to the foreshore, whilst providing opportunities for ground level activation via shops/tenancies, in connection with the Northern Access Road (Appendix JJ, Mac Point Precinct Plan op cit. pp24-25).

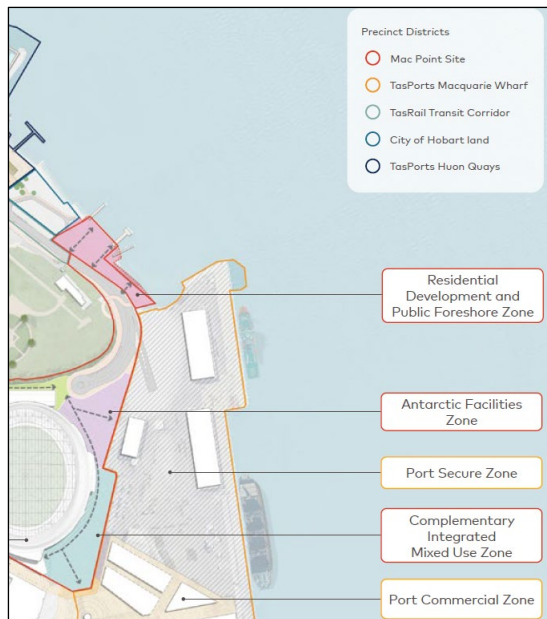


Figure 5: excerpt from the Mac Point Precinct Plan showing the proposed redevelopment of foreshore at the edge of the Regatta Ground (source: Summary Report op cit. Fig O-3)

The PoSS is fundamental to the facilitation of this element of development, identified as part of Stage 2 of the Mac Point Precinct Plan (op cit.p30).

Strategy 2: *Create new pedestrian linkages to the Domain*

6 new bridges are identified for the purpose of providing improved connectivity and access between the Domain and the CBD. Of those, 2 are immediately relevant to Macquarie Point:

- *Connect the Cenotaph to the floor of Sullivans Cove via a land bridge over a new public car park (services Hunter Street, the Cove generally and future multi-use development in the rail yard).*
- *Create a new shared path over the Tasman Highway to link Cenotaph area with the Domain and the Soldiers Memorial Avenue; Ensure any design is respectful of the dignity of the Cenotaph and its surrounds; Design to ensure bridging of the existing pedestrian path along the Tasman Highway frontage.*

Since the introduction of the Domain Masterplan a public staircase has been constructed linking the Cove Floor at the rear of the Royal Engineers building to the Cenotaph, partially fulfilling the former bridge recommendation. This is in response to a more flexible requirement for a 'pedestrian link' provided in the Macquarie Point Rest Masterplan 2017-2030 and the consequent Macquarie Point Site Development Plan 2017 that is incorporated into the SCPS. The staircase is in the approximate location of the proposed bridge.

The recommendation for a bridge over the Tasman Highway to link Cenotaph area with the Domain and the Soldiers Memorial Avenue has been fulfilled by the construction of the Bridge of Remembrance.

A further connection has been mooted in the Mac Point Precinct Plan, indicating a potential bridge between the Site and Collins Street (over Brooker Avenue and the Tasman Highway).

This potential connection has arisen from discussions with Hobart City Council, where the future plans to form a connection between the active transport in Collins Street and the Site were noted (Planning Report op cit. p60). This connection would assist in the movement of pedestrians to and from the Multipurpose Stadium during events and is supported and outlined in further detail in Appendix N (Transport Study).

The existing and potential additional connections are consistent with the recommendations under Strategy 2 of the Domain Masterplan.

Strategy 3: Establish a high order pedestrian/cycle connection from Sullivans Cove and the City, to link with the Royal Tasmania Botanical Gardens (RTBG).

The Precinct Plan incorporates future provision of pedestrian, cycling and public transport routes through Regatta Point and the Cove, via the Northern Access Road as committed in the Hobart City Deal and outlined in the Keeping Hobart Moving Strategy.

Strategy 4: Develop a hierarchical system of transport to, from and within the Domain.

Under this strategy 4 recommendations are made that are potentially relevant to the Project:

- *Rationalise car parking management including making allowance for 'peak events';*
- *Improve ferry facilities at Pavilion Point (RTBG) and develop a new ferry terminal at Regatta Point.*
- *Create and designate bus and taxi lay-by and parking areas at key destinations (Cenotaph, Regatta Grounds, Aquatic Centre, University Campus, Domain Tennis Centre, TAC and DAC).*
- *Promote the concept of a public transit corridor (light rail line or an express bus lane) on the (former) with transit stops at the RTBG and the Regatta Ground.*

The management and ferry recommendations are integral to the transport strategies proposed in the Transport Study (op cit). The stadium will include designated bus and taxi lay-by areas, and underground parking. The broader transport and access strategies included in the Transport Study go beyond the limitations of the Domain Masterplan recommendations, to provide for a greater pedestrian focus.

The proposed Northern Access to some extent limits the potential for a bus or light rail connection to the CBD, but does not preclude the proposed bus plaza from becoming a terminus for such a service in the future. In fact it provides significant potential for greater activation of the plaza areas around the stadium than might have been contemplated hitherto.

The Project will also advance the pedestrian linkage along the waterfront at Regatta Point, whilst the recommended cycling link (currently incomplete between McVilly Avenue and the Royal Engineers building) will be completed.

Strategy 7: Enliven and further develop each of the principal precincts of the Domain as activity centres – Cenotaph / Regatta Ground, Davies Avenue Corridor, TCA, Soldiers Memorial Oval and the Hill.

The recommendations under Strategy 7, so far as they are relevant to Macquarie Point and the Project restate those recommendations identified above.

Overall, the Mac Point Precinct Plan and the PoSS are consistent with the Domain Masterplan to the extent that they will provide or facilitate the following:

- Develop an urbanised edge to the Cenotaph / Regatta Ground that incorporates opportunities for:
 - launching and retrieval of small water craft;
 - pedestrian promenades with quality paving and street furniture and lighting.
- Through the delivery of the Northern Access Road under the Hobart City Deal, provide a plaza supported by pedestrian movement corridors and bus / taxi pick-up and drop-off and continuation of the Inner City Cycleway.
- Provide potential for a new ferry terminal at Regatta Point.

Management And Redevelopment of the Hobart Aquatic Centre: generally, the PoSS and broader Precinct Plan will not have any direct impacts on the operation of the Aquatic Centre or any of the planned redevelopment/upgrade work.

However, the associated increase in traffic and demand for parking generated by the Multipurpose Stadium may contribute to congestion on event days with potential impacts on both facilities. This has been considered in the accompanying Transport Study (Appendix N), which outlines several event traffic, transport, and parking plans. The Event Parking Plan recommends traffic management measures to restrict the use of public parking areas within the Domain, to maintain functionality, safety, and efficiency for the public and users of the Domain sporting facilities (op cit.).

It is noted that the traffic, transport, and parking plans will require regular review, particularly in the first year of Multipurpose Stadium operations as traffic/parking demands change and the proposed active and public transport modes come online (Planning Report op cit. p65).

The Summary Report specifically addresses potential land use conflicts between the Multipurpose Stadium and various facilities across the Domain (op cit. Chapter 2 and Chapter 4), as does the Transport Study (Appendix N). The Planning Report considers potential conflicts in respect of car parking and defers to the proposed traffic management plans outlined in the Transport Study. Underpinning the management of traffic and parking for stadium events are the following recommendations:

- Introducing traffic management measures to restrict the use of public parking areas within the Domain, to maintain functionality, safety, and efficiency for the public and users of the Domain sporting facilities (Planning Report op cit. p65);
- Reducing reliance upon private vehicles for access to and from the venue by:
 - Leveraging existing, expanded, and new public transport modes/methods and facilities
 - Improving walkability and pedestrian corridors; and
 - Promoting alternate forms of transport.

(ibid. p170)

5.40 Statutory Planning Controls

For continuity I have adopted the same general assessment format as provided in the Planning Report. I have indicated both where I agree with the content of the Planning Report assessment, and where I disagree – with accompanying explanation.

The assessment is therefore provided under the following headings, with firstly:

- *Sullivans Cove Planning Scheme 1997* - the primary statutory instrument providing the scope for assessment of use and development within Sullivans Cove;

...and then following (in Section 6.) under the overall heading Macquarie Point Planning Background, as provided in the Planning Report (op.cit. p78):

- *Macquarie Point Strategic Framework and Masterplan 2015-2030* – a previous master planning exercise that formed the basis for amendments to the SCPS in 2015;
- *Macquarie Point Reset Masterplan 2017-2030* – a new masterplan reflecting an alternative vision for Macquarie Point, forming the basis for the 2017 Site Development Plan;
- *Macquarie Point Site Development Plan 2017* – detailed urban design criteria designed to implement the Macquarie Point Reset Masterplan 2017-2030, and forming the basis for amendments to the SCPS in 2018;
- *Mac Point Precinct Plan 2024* – a precinct plan reflecting a revised vision for Macquarie Point including the proposed multipurpose stadium and Antarctic precinct, and corresponding new building typology;
- *Macquarie Point Site Development Plan 2024* – an analysis of the principles (derived from the SCPS and SCPR) that apply to the Site, and recommended appropriate guidance for new use and development.

5.41 *Sullivans Cove Planning Scheme 1997*

The Project Site, and Macquarie Point overall are within the area of the Sullivans Cove Planning Scheme 1997 (**SCPS**).

Part A – Preliminary

The SCPS is generally a performance-based planning scheme recognising that there are in many cases a number of ways in which land use and development can satisfy desired environmental, social and economic standards. Whilst a number of development controls in the Scheme are prescriptive in nature, alternative performance criteria are provided as a means by which the objectives and desired outcomes of the scheme may be satisfactorily met.

The relevant fundamental requirements under the Scheme are stated under clause 1.3 as:

1. *The Scheme should recognise that Sullivans Cove:*

(a) Contains the principal port in Southern Tasmania which should continue to operate as a port with all necessary port facilities and infrastructure including viable transport access; and

(b) Contains buildings, monuments, structures and spaces reflecting the history and development of Tasmania and establishing a unique precinct which must be developed, enhanced or preserved in a manner consistent with its historical character; and

(c) Should provide recreational and commercial opportunities for the Tasmanian community and visitors to Hobart which should be maintained, enhanced or developed.

2. ...

3. *The Planning Scheme must:*

(a) Have regard to the different requirements of each Zone; and

(b) Have regard to the objectives and principles of:

(i) The Sullivans Cove Planning Review published in 1991 by the Sullivans Cove Development Authority as existing before the commencement of this Act; and

(ii)...

(iii) The Sullivans Cove Traffic and Parking Management Strategy published in 1995 by that Authority.

5.42 Comment: the overall planning approach to Sullivans Cove, pre-empted by the SCPR and subsequently reflected in the SCPS places greater emphasis on 'urban design' over the spatial and economic efficiency aspects of 'land use planning' than is more often the case in traditional statutory planning schemes. The 'strategic planning principles' therefore reflect the perceived spatial typology and arrangement of buildings within the (assessed) landscape, ie 'how it looks and how it is perceived'. The more fundamental and traditional aspects of land use planning, ie 'how it works and whether it is compatible with surrounding use and development' are addressed under section 6.0 Use and activity. However, there is no overt discussion of 'strategic planning principles' relating to land use, spatial and economic development in section 6.0. It is at best implied (more comment about that later in respect of section 6.0 below).

5.43 Moreover, the requirement under clause 1(b) above emphasises physical and spatial development being undertaken in a manner "consistent with historical character". In respect of the Project Site and Macquarie Point overall this is problematic given the dynamic nature of land use and built typology since the initial European settlement. The changes include:

- 1804-1814 - Initial clearing of native vegetation, the planting of crops above the original shoreline and building of Fosbrook's cottage (Appendix M to the PoSS documents: HAY, A. Draft Macquarie Point Stadium Historical Archaeological Assessment 20/8/24, p23).
- 1814-1821 - building of Lord's house, store and circular driveway; establishment of Howard's 'Europe Warehouse' at the western end of the Site (ibid. p26).
- 1821-1835 – acquisition by the Government; use of the former Lord house and outbuildings as a school, temporary housing for female convicts and military veterans and eventually the home and offices for the Civil Engineer/Colonial Architect with a new stable; creation of the 'Lumber Yard' (aka King's Yard and Queen's Yard) including workshops surrounding the yard used by turners, nailors, carpenters, sawyers, wheelwrights, tin smiths, armourers, painters, glaziers, coopers, saddlers and harness makers. Stores were also erected for bricklayers, masons and stone cutters working in the nearby quarry (at the base of what is now the Cenotaph); private shipbuilding on the shoreline; construction of a slipway from the Lumber Yard to low water mark (ibid. pp26-31).
- 1835-1870 – conversion of Lord's house to barracks and the Lumber Yard to the '(Royal) Engineers Yard' along with its enlargement and reconfiguration; the construction of the extant Royal Engineers headquarters building outside but adjacent to the current PoSS site; changes and additions to the barracks building and the addition of further outbuildings; conversion of Lord's old store building to houses; conversion of the Engineers Yard to a drill yard for use by the volunteer military groups together with modifications to older storage buildings and conversion of one to an amphitheatre (ibid. p32). The Draft Macquarie Point Stadium Historical Archaeological Assessment postulates that various jetties and the potential beginnings of seawall occurred during the Royal Engineers occupation (ibid. pp33-36). From 1858 Slaughter Yards were established between what was then known as the Queen's Yard and low water mark. This included reclamation at a lower level than the Queen's Yard with a stone seawall constructed at the outer edge of the area. Construction also included 2 large brick buildings, stock yards, a jetty and a stone house for the Superintendent. Various related works developed such as tanneries and a soap and candle factory (ibid. p37).
- 1870- 1890 – passing of the Site to the contractors of the Main Line railway for use as a storage ground, and of the existing stables, carpenters, and blacksmiths shops in the construction of wagons; re-use as a drill yard for military volunteers in response to the fear of Russian invasion (ibid. p32). The gradual development of the gasworks to the west of the PoSS site reinforcing the developing industrial character of the Macquarie Point along with higher and bulkier structures such as tanks and chimneys.
- 1872-2014 – construction of the railway, yards involving quarrying of the lower slopes of what is now the Cenotaph, and gradual inclusion of workshops, and goods sheds over the next century. The locomotive 'roundhouse' on the site of the original drill yard completed in 1915. The construction of the 140m long Ocean Pier, with the original Hobart Rivulet course being filled in to become Evans Street. The construction in late 1915 of the Goods Shed being the second largest building after the roundhouse. This building was extended from 91m to 113m in c.1946. In c.1952, the railways constructed a new two storey amenities and office building costing on the site of Lord's 1815 house – what is now known as 8A Evans Street. A number of small workers huts

were constructed on either side. The removal of many railway building followed the takeover of the Tasmanian Railways by the Australian National Railways in 1978. The Macquarie Point railyard gradually became less suited for freight handling and rail use ended in 2014 (ibid. pp42-49).

- 2014- present – since the gradual decline in railway operations in the 1980s the Project Site has been used as a transit area for road freight transport including a cool store, and concrete batching plant. Upon the relocation of road freight transport to the Brighton Transport Hub, the remaining buildings and railyard space have been used for offices, events space and a boutique brewery. The majority of space has been temporarily converted to car parking pending resolution of the future use of the Project Site.

5.44 If the requirement under clause 1(b) of the planning scheme is to be given any weight, then it begs the question: “which stage of development is the appropriate ‘historic character’ against which development of the Site should be compared?”

In purely temporal terms the development and use of the Site that has most greatly impacted on both the land and built form of has been (in ascending order):

- Recent car parking (approx. 6-7years);
- Early colonial residence and commerce (approx. 7 years);
- Initial clearing and agriculture (approx. 10 years);
- The ‘Lumber Yard’ – mixed administration, commerce and industry (approx. 14 years);
- The Royal Engineers (and voluntary military groups) – mixed military, administration, commerce (approx. 38 years in total);
- Transport freight hub - late 20th century transition from rail to road transport (approx. 42 years);
- The Slaughter Yard (approx. 51 years)
- Railway yards (approx. 142 years)

The Draft Macquarie Point Stadium Historical Archaeological Assessment considers that:

The construction of the railyard and the associated early twentieth century land reclamation has given the project area its character that it retains at the beginning of the twenty-first century. The current ground surfaces within the project area were given shape during this time and the remaining southeastern parts of the study area were reclaimed. Although the majority of rail infrastructure has been removed from within the project area, with notable exception of the State Heritage Register item, the Hobart Railway Goods Shed (THR ID:10995), the current layout of the study area most closely reflects the rail yard historical phase. (ibid. p45)

5.45 Historically therefore, the Project Site has undergone dramatic changes from initial simple single residence and agriculture through basic commerce and administration, military establishment, stock and slaughter yards, industrial development, a railway yard and freight hub, to car parking and an unknown future. But it is the Railway Yard that has had the longest and greatest historical presence and impact.

- 5.46 Apart from initial settlement, the Project Site has always been part of a ‘hub’ whether it be administrative, commercial, industrial or transport-related. A future that always reflects the historical use of the Site as a ‘hub’ would be consistent with its size and location within Sullivans Cove and the broader metropolitan area.

But in terms of identifying a particular ‘historical character’ as sought by clause 1(b) of the planning scheme, it is impossible to be definitive without making some subjective judgement: should a new use and development reflect the character of the Railway Yard, the stock and Slaughter Yards, the Drill Yard, a car park, or the original initial development immediately after settlement?

- 5.47 This conundrum is compounded by the varying ambitions of the current PoSS, the current planning scheme provisions for Macquarie Point (including the 2017 Site Development Plan), the 2024 Site Development, and the SCPR. All of these documents envisage a different future for Macquarie Point than has occurred historically, yet none of them provide a clear and verifiable nexus to the actual historical character of Macquarie Point overall and the Project Site in particular. This is because, to do so would be subjective – an act of ‘cherry-picking’ a particular era of development and ignoring all of the others. This is a matter that will be discussed further in relation the relevant document and issues, below.

5.48 *Part B – Sullivans Cove Strategic Framework*

The purpose of this strategic framework is stated under clause 4 of the planning scheme as being to:

- Identify the values and strengths of the Cove which the Scheme aims to protect; and
- Define a preferred future for the Cove; and
- Define the planning principles which underlie the land use and development controls contained within the planning scheme.

This strategic framework must be used in the consideration and assessment of all applications for use and development in the Sullivans Cove Planning Area.

- 5.49 Clause 5 – Values and strengths of the Cove - a number of statements are made under clause 5 that provide a set of significant premises for assessment later in the planning scheme:

- *Set against the dramatic backdrop of Mount Wellington, with Hobart City Centre in the foreground and opening out to the Derwent Estuary, Sullivans Cove is one of the world’s finest city landscape settings.*

Comment: this statement (albeit subjective and arguably hyperbolic) establishes the landscape setting of Sullivans Cove as a significant consideration.

- *Sullivans Cove is Australia’s most intact historic waterfront.*

Comment: this is an erroneous statement – provided without any explanation. The statement ignores the dynamic nature of the development of the Cove and the varying degrees of influence that the stages of development have wrought on the spatial and built character. It

would be more accurate to state that Sullivans Cove retains significant elements that reflect the various stages of development over the past 2 centuries. Notwithstanding this, it cannot be the case that the Project Site can be considered a remnant or intact historic element – it is the product of substantial modification to the both the landform and built fabric.

- *Sullivans Cove remains a true dynamic and evolving working port.*

Comment: whilst being factual this statement also reinforces the dynamic nature of the Cove, particularly how the development of port operations has shaped the space (reclamation and enlargement of the Cove floor), introduced new elements (wharves, warehouses, commercial buildings and marina), and discarded others (wharves, warehouses, factories, gasworks).

- *The Cove is a place for people - its historic buildings, formal parks, roads and other public spaces have largely retained the pedestrian scale that existed during the early settlement of Hobart.*

Comment: This statement is not applicable to the Project Site which has had a varied past in respect of the scale and character of development, being predominantly used for rail and freight transport. Nor does the Project Site have a past that is consistent with the narrative that characterises Sullivans Cove as a 'place for people'. The proposed stadium would represent a further evolution in the development and use of the Macquarie Point portion of Sullivans Cove, and also potentially bring the precinct more into alignment with the concept of a 'place for people'.

- *Sullivans Cove is a cultural, artistic and festive focus for the City.*

Comment: The stadium will be used for cultural activities and is therefore consistent with the statement.

- *(new residential) developments will ensure that the Cove develops as an active and vibrant place, 24 hours a day.*

Comment: The stadium will contribute to activity beyond traditional '9 to 5'. Stage 2 of the overall development of the PoSS includes residential development on the adjacent Regatta Point area.

- *The Cove's location, with excellent transport links provides potential for further economic development.*

Comment: the potential for integration of the Project with new transport linkages (ferry, bus, cycleway, light rail) is provided – initially with the bus plaza, and the longer term as a public transport hub.

- 5.50 Clause 6 – A preferred future for the Cove - a number of statements are made under clause 6 that provide a supporting strategy plan to express the preferred future urban character and activity directions for the planning scheme to facilitate. These are required to be taken into consideration in the assessment of all applications for use and development:

- *An Economic Base for the Future: facilitation of port operations including adequate access; development of educational, artistic and cultural activities and facilities; tourism, retail and other commercial development, civic and administration activities, research and development, arts and craft, and technology based industries.*

Comment: the Project has the potential to contribute significantly in terms of artistic and cultural activities and facilities, and tourism.

- *Designing the Future Urban Form:*
 - I. *the Cove's unique historic cultural heritage should be retained;*
 - II. *The future urban form of the Cove should respond to the quality of spaces and buildings which exist within the Cove;*
 - III. *Future developments within the Cove should respect the scale of the Cove's built form - new buildings should not be out of scale with neighbouring buildings, or the general character of the Cove;*
 - IV. *The spatial characteristics of the Cove are as important to the character of the Cove as the buildings which frame these spaces. The future urban form of the Cove should therefore respect these spaces.*
 - V. *Development within Sullivans Cove will respect the natural amphitheatre created by the water and mountainous backdrop.*
 - VI. *Views and vistas within and beyond the Cove will be protected and restored where opportunities arise.*

Comment: the following comments refer to statements I.- VI. above, in the same order.

- I. The ability to particularise historic cultural heritage for the Project Site is problematic: the Site has a varied history in terms of use and development. Any attempt at prioritisation of the importance of one development era over another risks subjectification. Within the Project Site only the Goods Shed and Red Shed remain, from the railway era – the latter being relocated to the current site from elsewhere. No other eras are represented by any extant items. The extent to which the relationship of the Project with the adjacent 'off-site' heritage developments (eg Royal Engineers building, H. Jones & Co buildings) is addressed, is the subject of separate expert heritage assessment.
- II. The 'quality' of spaces and buildings that exist in Macquarie Point generally, and the Project Site in particular, are reflective of their port and rail transport and freight roles. The spaces are large and open, with buildings of a size and bulk reflecting their utilitarian purpose. They do not reflect the denser more rhythmic forms of warehouse and civic buildings in Salamanca Place, Hunter Street and fronting Franklin Wharf. The spaces between the latter buildings are well described and defined elsewhere in the planning scheme (eg. The Cove apron, primary spaces and secondary spaces). The area of the Project Site does not fit into those characterisations, and in fact is not readily described or defined in either the planning scheme or the precursor SCPR. To require Macquarie Point to be redeveloped in a manner that reflects the buildings and spaces elsewhere in Sullivans Cove would be artificial, and disrespectful to the authenticity and integrity of the extant values.
- III. & IV. When taken as a whole, including Macquarie Point, the 'general character' of Sullivans Cove is ill-defined: the Project Site and much of Macquarie Point never had

the same built form as the buildings in Salamanca Place, Hunter Street and Franklin Wharf. The narrative of the SCPR (to be discussed further below), adopted by the planning scheme is that the general character of Sullivans Cove derives from the historic warehouses, civic buildings, port associated development, and the way that the built fabric generally follows and reveals the underlying landform. There is no discussion about how the character of the Project Site contributes to the overall character of the Cove. Its physical separation from the rest of the Cove, and its historical industrial use and scale of development are at variance with the character of the remainder of the Cove and is rarely mentioned, and never acknowledged as being of significance. The buildings in Hunter Street (part of the 'built wall' of the Cove) and the Cenotaph/Domain headland are given prominence in both the planning scheme and the SCPR, but the Project Site is simply the space in between – both the SCPR and the 2024 SDP describe the Site as 'lost space'.

At the time that both the SCPR and the planning scheme were prepared in 1990 to 1996 the Project Site was still a functioning railyard, with associated road transport operations. These elements were not recognised in the same way as port operations, and possibly were not considered to contribute to the heritage, cultural or aesthetic values of the Cove. This has meant that apart from recognising the potential for redevelopment of the Project Site as a 'Key Site', the contribution of its character to that of Sullivans Cove overall is given little or no weight when compared to the other elements mentioned above. Given the references to the scale of the Cove's built form, the general character of the Cove, and the spatial characteristics of the Cove in statements III and IV, an objective assessment should also include those elements to the extent they are ascribed to the Project Site. In practical terms that would mean a recognition that the character of the Project Site is different to that elsewhere in the Cove, and a different typology of built form, scale and spatial character is able to be contemplated. This is a conclusion also reached by Brian Risby in the 2024 SDP:

- *The Mac Point site provides opportunities for the establishment of new uses that complement the cultural aspects without significant constraints generated by topography and heritage fabric or concerns about new structures being 'out of scale or character with the surroundings'. (op cit. p14)*
- *There is an opportunity for uses that require large footprints and significantly scaled buildings which would be out of keeping with much of the Cove, particularly in or close to the smaller scale and finer grained fabric of the 'wall'. (ibid. p53)*
- *The design of new buildings and structures should be consistent with the typology of buildings 'in the round', and reflect the robust industrial buildings of the past. (ibid)*
- *The site context indicates that the primary future character should be consistent with the existing Cove 'Floor' characterised by unstructured space with carefully placed, large-scale buildings with strong 'in the round' typology. This is consistent with the urban design guidelines applicable to the Cove but also reflective of the historical pattern and form of development on the site itself. (ibid. p62)*
- *...the Mac Point site should provide for larger scale buildings consistent with the Cove 'floor' typology, a (sic) using a variety of mass and form will diminish*

any individual visual prominence and provide a complex backdrop in keeping with both the typologies of the historic developments in that area and the more recent Zero Davey and IXL Apartment buildings. (ibid. p65)

V. & VI. Respecting the 'natural amphitheatre', and protecting and restoring views and vistas beyond the Cove are key matters that are addressed specifically later in this report.

- *An Ecologically Sustainable Future: All use and development which takes place in the Cove will be expected to demonstrate its environmental performance against the backdrop of environmental reporting.*

Comment: environmental reporting and performance is subject to a separate regulatory regime. It is not within my area of expertise to comment on the PoSS performance in this respect.

- *Creating a Place for People:*
 - I. Access to, and circulation within the Cove will be improved;*
 - II. Pedestrian amenity in key areas within the Cove will also be addressed;*
 - III. The Cove will continue to function as a space for cultural and festive events as well as provide for a broad range of tourist facilities and attraction;*
 - IV. Provide for preservation and interpretation of the Cove's cultural heritage;*
 - V. a wide range of accommodation choices, from permanent residences to short term tourist accommodation, will be encouraged within and around the Cove.*

Comment:

- I. The Project will provide access to an area of the Cove that has been 'closed off' from public use for nearly 2 centuries. Access to the Cenotaph/Domain and around the base of the Cenotaph headland to Regatta Point and beyond will be further facilitated.
- II. Pedestrian amenity will be improved collaterally through access to the Site, and specifically through landscaping and furniture in the concourse and plaza areas surrounding the stadium. The amenity of the area surrounding the stadium building will vary according to solar orientation and access, and wind direction. Annexure B (Consolidated Plans: Solar Studies, Revision P2, 31/1/25) provide shadow diagrams that indicate continual impact on the Evans Street side of the building in the Winter Solstice (June 21), and to a lesser degree at the Equinox (March and September). Shadow cannot be avoided on the southern side of a structure at any time of the year, however the greatest extent of shadow impact in terms of depth of shadow occurs on Evans Street and the buildings opposite from 9am till midday, but only during that winter Solstice period. The impacts on Evans Street and the adjoining buildings reduce considerably by the time of the Equinox, being only temporary. Varying degrees of solar access to all surrounding areas is available at all other times of the year (Appendix B – Stadium Design Description, p103). Amenity issues are also addressed in the following:
 - Appendix O (Wind Comfort Assessment for Visitors and the Precinct Area)
 - Appendix Y (Heat Risk and Climate Change Assessment)
 - Appendix NN (Public Art Strategy)

Additional information from AECOM (4-Mar-2025, p5) advised:

At all investigated locations outside the Stadium, pedestrian comfort is at least suitable for sidewalks. The comfort level would be further enhanced by incorporating shelter elements such as plantings, shade structures, and similar features into the landscape.

- III. The Project is consistent with the outcome of providing for cultural and festive events and broadening the range of tourist facilities and attractions.
 - IV. The mechanisms proposed to provide for preservation and interpretation of the Cove's cultural heritage, in respect of the Project Site and surrounds are outlined in the Summary Report (p134).
 - V. Residential development at Regatta Point is identified as Stage 2 under the Mac Point Precinct Plan 2024.
- *Arts/Culture/Education/Recreation: opportunities exist for new activities and facilities such as concert halls, visual arts centres, multimedia centres to meet artistic, recreational and intellectual interests.*

Comment: the proposal is for a multipurpose stadium with scope for a range of recreational, cultural and artistic events to provide for a broad cohort of the community.

- *Identification of 'Key Sites': the planning scheme identifies 'key sites' that have the potential to further develop the economic base, pedestrian environment, and cultural/recreational and educational profile of the Cove.*

Comment: The Project Site encompasses 2 key sites, being the Key Site 13 - 'Boral Site' (former concrete batching plant) and Key Site 19 – 'Former Rail Yard'. The requirements for addressing Key Sites are provided in Part F of the planning scheme, and include the Macquarie Point Site Development Plan (the SDP) which was inserted in the planning scheme in 2018 following the intent and broad provisions of the Reset Master Plan 2017-2030. The SDP provides standards for use and development, and desired outcomes for Activity Area 3.0 which corresponds with the former Rail Yard, Boral Site and part of the northern access road under the PoSS, but not the Regatta Point residential area. Part F and the Activity Area provisions are addressed separately later in this report.

- 5.51 Clause 7 – Planning principles for management of activities in the Cove – a number of principles are provided under clause 7 to ensure that:

...all activities (including use, development and other resource consuming activities) in the Planning Area contribute to the 'Preferred Future' for the Cove and are sustainable in accordance with the objectives of the Resource Management and Planning System as set out in Schedule 1 of the Land Use Planning and Approvals Act 1993. (ibid cl.7.2)

Clause 7.3 states that the principles are shown as indicated on Figure 2 of the planning scheme. In this respect Figure 2 indicates that the strategic direction for the Project Site is:

Potential mixed use development opportunities consistent with the Macquarie Point Development Corporation Act 2012

Outside of the Project Site potentially relevant strategic statements include:

In the vicinity of the 'Gasworks and 'Woolstore' sites:

Gateway to the Cove: Promote activities & buildings which reflect the cultural role & character of the Cove;

And with respect to the land between the Cenotaph and the foreshore of Regatta Point:

Sites of Cultural & Aesthetic Significance:

Protect cultural icons such as Domain, Cenotaph and Regatta grounds;

Protect vistas across the Derwent Estuary;

Future development to take into account the cultural, aesthetic & recreational values, as well as public access;

Shipping & related activities such as small boat building / refitting & slipyards will be encouraged

The Planning Report provides a comprehensive outline of the provisions under clause 7 that are relevant to the POS (pp67-72). I concur with the assessment provided, noting in particular that the matter of 'individual prominence' raised under clause 7.3.2 of the planning scheme is more conveniently addressed under the overall consideration of bulk, form and scale of the proposal later in this report. Similarly, views and visual impact are to be addressed separately later in this report.

5.52 **Part C – Application of the Scheme**

I concur with the Planning Report's summary of Part C of the planning scheme, that is:

This section outlines the application of the SCPS, stating that all use/development must be undertaken in accordance with LUPAA and the requirements of the SCPS.

Part C also outlines the level of information, plans and documents that must be submitted with planning applications and provides an overview of the approval/decision making process.

Whilst the provisions of the SCPS do not apply to the assessment of the PoSS, the TPC Integrated Assessment Guidelines do require the PoSS to give consideration to relevant matters within the SCPS.

(ibid. p72)

5.53 *Part D – Activity Area Controls*

Part D of the planning scheme guides use and development within the various 'Activity Areas'. The Activity Areas play a similar role to that of Zones within traditional planning schemes, but are more related to the perceived distinct character of each 'Area'.

The PoSS stadium site, ancillary stadium functions, the Antarctic Facilities Zone, and potential mixed use zone are within Activity Area 3.0 - Sullivans Cove Gateway (Macquarie Point Mixed Use Zone).

Relevant adjoining Activity Areas include:

Activity Area 2.0 – Sullivans Cove Mixed Use

- the Royal Engineers building;

Activity Area 2.1 – Domain Open Space

- the Cenotaph;
- Regatta Pavillion;

Activity Area 4.1 – Macquarie Point Wharf

- TasPorts port operations;

Activity Area 4.2 – Regatta Point

- Proposed mixed use/residential development;
- Regatta grounds;
- Huon Quays;
- Domain Slip yard.

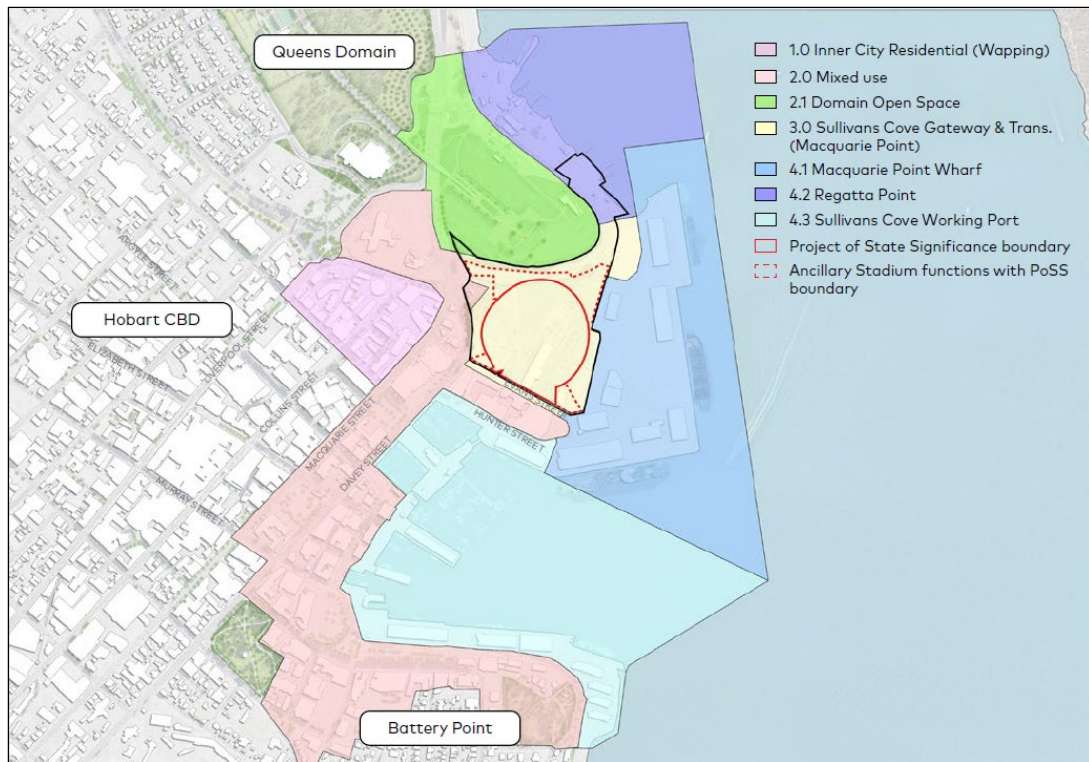


Figure 6: Extent of Sullivans Cove Planning Scheme and Activity Areas, with Precinct boundary shown black. PoSS Boundary shown red (source: TheLIST, with annotations from MPDC Summary Report op cit. p76)

Part D also classifies various activities into Use classes, which are in turn allocated Exempt, Permitted, Discretionary or Prohibited status within each Activity Area. Pursuant to the definitions included in Part G of the planning scheme the predominant activity associated with the stadium is considered to be consistent with the ‘Major Sport and Recreation’ Use class, defined as:

Land used for leisure, recreation or sport where there is substantial provision made for spectators, such as a grandstand, and to which spectators are usually charged admission.

Notwithstanding the above, the Macquarie Point Site Development Plan (the **SDP**) in Part F of the planning scheme overrides the Activity Area provisions for Activity Area 3.0. The SDP provisions were prepared to reflect the vision provided in the Macquarie Point Reset Masterplan 2017-2030. Assessment against the SDP is undertaken later in this report.

5.54 **Part E – Schedules**

Part E of the planning scheme provides a range of standards and considerations to guide use and development in Sullivans Cove. Whilst they are not directly relevant in the consideration and assessment of the PoSS some regard is required by virtue of the Integrated Assessment Guidelines (the **Guidelines**) prepared by the Tasmanian Planning Commission.

The Planning Report provides a comprehensive outline of the Part E provisions that are relevant to the POS (pp74-78). I concur with the assessment provided, along with the following additional comments:

5.55 Schedule 1 – Conservation of Cultural Heritage Values

One of the objectives refers to new development not compromising the recognisable historic character of Sullivans Cove, but does not specify which ‘historic character’. This is an important consideration for the PoSS Site which has undergone a number of changes of character through its history and has for the main part been industrial space and a Rail yard. The PoSS Site does not share the ‘historic character’ that is more readily identifiable in other parts of the Cove.

Notwithstanding the application of Schedule 1 in respect of consideration of the listed Goods Shed and Red Shed, a consideration of development on the heritage values of the broader PoSS Site is exempt within the Macquarie Point Wharf, Activity Area 4.1 and Sullivans Cove Gateway – Activity Area 3.0, by virtue of clause 22.5.2. However, no such exemption applies to consideration of archaeological sensitivity which is addressed under clause 22.6 of the planning scheme.

In terms of meeting the Guidelines the following project documents are relevant:

- Appendix K – Previous Aboriginal Heritage Investigations
- Appendix L - Historic Cultural Heritage Impact Assessment, and associated updates in response to the TPC Further Information Request.
- Appendix M – Historical Archaeological Assessment, Sensitivity Report and Method Statement

5.56 Schedule 2 – Urban Form

The premise for consideration of urban form under Schedule 2 is again that Sullivans Cove has a distinctive urban form which is part of its recognisable historic character. The Schedule does not describe the differential character of the Project Site, but rather provides an exemption from this schedule for buildings within the 'Macquarie Point Site Development Plan' in clause 32 under Part F of the Scheme. The Part F provisions are considered later in this report.

5.57 Schedule 3 – Public Urban Space

All buildings and works within the ‘Macquarie Point Site Development Plan’ standards in clause 32 under Part F of the Scheme are ‘exempt’ from this schedule.

5.58 Schedule 4 – Signs

Schedule 4 outlines standards for the provision of signage within the Cove.

The broader signage strategy is outlined in the following supporting reports/plans:

- Appendix Z – Signage report

A detailed outline and assessment of the proposed signage is provided in section 8 of the Planning Report and will be commented on in so far as it responds to Section 9.1 of the Guidelines later in this report.

5.59 Schedule 5 – Traffic, Access and Parking

Schedule 5 provides objectives for each Activity Area within the Cove, as well as standards for aisle widths and parking (in accordance with the relevant Australian Standard).

I concur with the Planning Report's summary of the objectives applicable to Macquarie Point including the Project Site (op cit. p76). Beyond those comments I defer to the expert reports provided in:

- Summary Report
 - Chapter 4 – Movement
- Appendix N (Transport Study)

5.60 Schedule 6 – Subdivision

It is my understanding that affected titles will be consolidated.

5.61 Schedule 7 – Demolition

As stated in the Planning Report, "the provisions of Schedule 7 relate to demolition within the Cove, noting that buildings and works within the Cove should not be demolished without appropriate consideration and assessment regarding impacts on the urban form and cultural heritage of the Cove" (ibid. p77).

Under clause 28.4.1 of the planning scheme the following are exempt from the provisions of Schedule 7:

- *Demolition within the 'Macquarie Point Wharf' Activity Area 4.1;*
- *and Demolition of buildings or works existing prior to the implementation of a Site Development Plan, within the Sullivans Cove Gateway Activity Area 3.0 except for the Royal Engineers Building (Ref No 26 Schedule 1) and the Toll Goods and LCL Sheds at 14 Evans Street.*

The Project Site is located within the Sullivans Cove Gateway - Activity Area 3, however there are no changes proposed to the Royal Engineers Building. The Toll Goods shed is the 'Goods Shed' which is to be relocated and incorporated into the Stadium and will be accompanied by a new Conservation Management Plan which is being prepared. The 'Red Shed' is also to be relocated or stored.

I concur with the Planning Report comments regarding the appropriate consideration of the relocation of these buildings in the following supporting reports (ibid):

- Appendix AA (Construction Management Plan)
- Appendix I (Urban Design Framework Report)
- Appendix L (Historic Cultural Heritage Impact Assessment)
- Appendix N (Noise and Vibration Assessment)

5.62 Schedule 8 – Environmental Management

Schedule 8 applies to development within Macquarie Point, outlining specific criteria regarding the existing Macquarie Point Wastewater Treatment Plant.

The matters provided for in this Schedule are not within my area of expertise and are appropriately addressed through the following expert reports:

- Summary Report
 - Chapter 7 – Environmental quality and hazards
- Appendix BB (Utility Services)
- Appendix HH (Site Remediation Strategy)

5.63 Schedule 9 – Telecommunications Infrastructure

Schedule 9 provides requirements and considerations to control the provision and/or impacts on telecommunications infrastructure within the Cove.

Insofar as they are relevant to the specifics of the PoSS they are considered as part of the overall assessment against the Guidelines later in this report.

5.64 Part F – Key Sites

Part F of the planning scheme identifies ‘Key Sites’ which have:

...the potential to accommodate activities which will further the ‘preferred future’ and strategic principles contained within the Scheme.

These are sites which the Planning Authority has identified as having the potential to be used or developed to achieve a range of strategic planning objectives. It is intended this section of the Scheme facilitate the identified preferred future through promotion of appropriate use and development on strategically important and presently under-utilised sites within the Cove. (ibid cl.31.1)

The Project Site is made of 2 identified Key Sites:

- Key Site 13 – Boral Site (former concrete batching plant); and
- Key Site 19 – Former Railyard.

Pursuant to clause 31.4 of the planning scheme:

- prior to any significant development of a Key Site a ‘Site Development Plan’ must be prepared.
- A Site Development Plan may be incorporated into the Scheme by amendment pursuant to LUPAA.
- All Site Development Plans prepared for Key Sites must reflect the provisions of the Strategic Framework (Part B) and the Objectives and Performance Criteria of the relevant Activity Area (Part D) and satisfy the Objectives and provisions of the Schedules (Part E) of the planning scheme.

Currently the Project Site is subject to the Macquarie Point Site Development Plan (**SDP**) under clause 32 of the planning scheme. The SDP provides specific use and development controls and was introduced into the planning scheme by amendment in 2018. The SDP implements the Macquarie Point Reset Masterplan 2017-2030 (the **Reset Masterplan**), which itself provides an urban design rationale and guidelines underpinning a vision presented by the Museum of Old and New Art (**MONA**) in 2016.

Neither the Reset Masterplan nor the current SDP envisaged the current PoSS. Accordingly, there are elements of both that are at odds with both the overall concept and the design detail of the current PoSS.

In order to be consistent with clause 31.4 of the planning scheme it is proposed to amend the planning scheme (or its replacement under the Hobart LPS) to replace the current SDP. That replacement is provided in the form of the 2024 SDP (Appendix GG to the project documents). To further inform the contextual development of the areas adjoining the Project Site the MPDC have also prepared the Mac Point Precinct Plan 2024 (Appendix HH to the project documents).

6. MACQUARIE POINT PLANNING BACKGROUND

- 6.1 The Planning Report provides a helpful summary of the studies, reports and instruments that have influenced the potential future use and development of Macquarie Point from the preparation of the Macquarie Point Strategic Framework and Masterplan 2015-2030 up to the current PoSS proposal (op.cit pp78-94).

I largely concur with the outline and comments in those pages of the Planning Report and therefore do not seek to duplicate that information except for the sake of emphasis, disagreement, or additional comment.

- 6.2 My first area of disagreement is only minor as it involves the role of the SCPR, which in my opinion is an important background element – a matter upon which the Guidelines appear to agree. However, I do note that the Planning Report does consider the SCPR albeit separately (ibid. pp94-95).

6.3 **Sullivans Cove Planning Review 1991**

The SCPR significantly underpins the planning scheme by identifying a series of statutory parameters and advisory guidelines based on identified principles (op cit. p109). These guiding principles include:

- Retaining unique heritage character of Sullivans Cove;
- Respecting the natural landscape and maintaining important views;
- Creating a legible and heritage character;
- Gradually eliminating 'lost space';
- Creating a stepped built structural form that highlights the natural rise between the Cove floor and the neighbouring districts;
- Controlling building bulk so that no single building dominates the street or its neighbours;
- Guidelines around placement and design of detailed elements (eg furniture, signs, paving, infrastructure etc);
- Facilities that contribute to amenity shall respect the "special image of Sullivans Cove";
- Sullivans Cove shall continue as a working port, fishing and yachting harbour, cultural centre, recreation and entertainment district, centre of Government and administration and place for commerce and living;
- It shall display its history and have a life beyond 9 to 5;
- New activities shall not demand new buildings which are out-of-scale with the Cove;
- The strong visual image of the Cove shall be maintained;
- Land uses which require very large, undifferentiated floor areas and dictate high and bulky buildings shall be excluded from certain areas of Sullivans Cove;
- Sullivans Cove shall be revitalised and its public use extended through development that is complementary to the Heritage character of the Cove;
- Prioritisation of port movements within the proclaimed Port area;

- Reduction of vehicular movements and improvement of pedestrian and cycling amenity;
 - Improvement of public transport including provision of a major transport terminal.
- (ibid. pp103-108)

6.4 The narrative of the SCPR (to be discussed further below), adopted by the planning scheme is that the general character of Sullivans Cove derives from the historic warehouses, civic buildings, port associated development, and the way that the built fabric generally follows and reveals the underlying landform. There is no discussion about how the character of the Project Site contributes to the overall character of the Cove. Its physical separation from the rest of the Cove, and its historical industrial use and scale of development are at variance with the character of the remainder of the Cove and is rarely mentioned, and never acknowledged as being of significance.

6.5 The buildings in Hunter Street (part of the 'built wall' of the Cove) and the Cenotaph/Domain headland are given prominence, but the Project Site is simply the space in between – being described as 'lost space'.

6.6 At the time that the SCPR was being prepared in 1990 the Project Site was still a functioning railyard, with associated road transport operations. These elements were not recognised in the same way as port operations, and possibly were not considered to contribute to the heritage, cultural or aesthetic values of the Cove. This has meant that apart from "gradually eliminating lost space", the contribution of the Project Site's character to that of Sullivans Cove overall is given little or no weight when compared to the other elements mentioned above. Given the references to the scale of the Cove's built form, the general character of the Cove, and the spatial characteristics of the Cove, an objective assessment should also include those elements to the extent they are ascribed to the Project Site. In practical terms that would mean a recognition that the character of the Project Site is different to that elsewhere in the Cove, and a different typology of built form, scale and spatial character is able to be contemplated.

6.7 The SCPR provides an overall context for the Cove through referral to the more visually obvious character elements, but provides little guidance in respect of the Project Site regarding:

- Its 'heritage character';
- where it fits in the 'hierarchical structure of spaces';
- how its redevelopment might promote the "special image of Sullivans Cove" and what that image might be;
- what aspects of the "strong visual image of the Cove" might be prioritised, and what might be discarded;
- whether the Site is an area that land uses which require very large, undifferentiated floor areas and dictate high and bulky buildings should be excluded from.

I agree with the Planning Report's assessment that the SCPR does not provide any significant analysis of the Site or what future development might be appropriate (op cit. p95).

6.8 The SCPR does provide the initial basis for consideration of key views to and from the Cove, as demonstrated on page 70 of the SCPR (and shown in Figure 9 of the Planning Report). At the

time of preparing the SCPR, the key views for consideration in respect of the Project Site were to and from the Cenotaph along Macquarie Street and Morrison Street. A broader view to the Cove down Montpelier Retreat is also relevant as it includes the Hunter Street buildings with the Cenotaph rising in the background.

- 6.9 It is a matter of fact that many of the developments that have taken place since the SCPR in 1991 have altered the land use, townscape and the character of different parts of the Cove, eg:

- the Silos redevelopment;
- IMAC;
- Princes Wharf No 1 redevelopment;
- Zero Davey Street;
- The IXL apartments;
- Mac 1 redevelopment;
- Mac 2 redevelopment;
- The Kings Street Pier marina;
- The clearing of the Rail Yard; and
- the demolition of 10 Murray Street and redevelopment as Parliament Square.

- 6.10 The SCPR and its background assessment, principles and guidelines are therefore of varying degrees of relevance – a fact identified in the Sullivans Cove Economic Study 1991, quoted on page 103 of the SCPR:

An appropriate review period must be determined (op cit)

- 6.11 No coordinated or comprehensive review of the SCPR has been undertaken and it has been left to the planning scheme, subsequent master-planning exercises, Site Development Plans and precinct planning to develop a potential future for the Site. These are examined below.

6.12 **Macquarie Point Strategic Framework and Masterplan 2015-2030**

The MPDC prepared the Macquarie Point Strategic Framework and Masterplan 2015-2030 (**former masterplan**), along with a set of amendments to the *Sullivans Cove Planning Scheme 1997* (the **planning scheme**) in 2015. The former masterplan divided the Site into a grid typology of streets, building envelopes, and mixed use areas which promoted commercial uses on the ground level and residential above. In this sense it could be interpreted that the 'character of the Cove' was seen as being homogenous, and that the Site should be consistent with that perception. As stated earlier in my report, it is my opinion that such an approach is erroneous as it ignores not only the variety of use but also the typology of development of the Site since European settlement. In addition, the Site is hidden from views within the Cove, and any character previously or potentially imbued on the Site would have little effect on the traditional image and perceptions of the Cove between Hunter Street and Salamanca Place.

The former masterplan underpinned a planning scheme amendment, in the form of a Site Development Plan, approved by the Tasmanian Planning Commission in November 2016.

6.13 **Macquarie Point Reset Masterplan 2017-2030**

As indicated in the Planning Report, the Reset Masterplan outlined the urban design rationale which underpinned the 2016 MONA vision for Macquarie Point, aligning with the strategic policies of Parts A and B of the SCPS. The Reset Masterplan outlined the key concepts, proposed uses and built forms which reflected the landscape within which the site sits (Planning Report op cit. p79).

6.14 The Reset Masterplan also imposed some extremely detailed and specifically applied building envelopes to the area based on the MONA vision around a large central public space with a range of smaller streets or laneways creating a very deliberate urban form and footprint. This detailed spatial typology included an increase in 'deemed to comply' building heights decreasing in height toward the boundaries of the Site. This reflected both a more detailed analysis of the Site, but also aspects of the MONA vision. However, there is no clear and obvious nexus to a particular 'heritage character'. Rather, (in my opinion) the emphasis is on facilitating individual developable parcels, ensuring appropriate public space and access, and reflecting and respecting the landscape within which the site sits.

6.15 A crucial aspect of the Reset Masterplan is the acknowledgement that the Site is capable of being 're-imagined' and is not bound to a sense of homogenous character of the Cove overall, nor of a particular character that is 'borrowed' from a specific element or area elsewhere in the Cove.

6.16 In order to implement the Reset Masterplan the Macquarie Point Site Development Plan 2017 (**SDP 2017**) was prepared (as required under Schedule F of the planning scheme) and was consequently inserted as an amendment to the scheme in 2018. The SDP 2017 is addressed below.

6.17 **Macquarie Point Site Development Plan 2017**

The consistency of the PoSS with the provisions of the SDP 2017 (clause 32 of the planning scheme) is considered at length in the Planning Report (op cit. pp79-90). I generally concur with that assessment and do not wish to unnecessarily replicate it in this report, but rather to identify key points or areas of disagreement as follows.

6.18 ***Desired Future Character Statements***

The PoSS is not subject to the planning scheme or the existing Site Development Plan (to which the current Desired Future Character Statements (**DFCSs**) relate). However, some statements contain key urban design considerations which have been adopted within the TPC Integrated Assessment Guidelines (the **Guidelines**).

Overall, the Planning Report argues that the proposed Stadium design and location are consistent with the DFCs through:

- *The design of the Stadium, specifically the external materiality, roof-form and civic works directly drawing upon the industrial and cultural history of the site;*
- *The dome-like roof resembling the form and topographic rise of surrounding hillsides such as the Domain headland, which rise up and away from the Cove Floor;*
- *helping to reinforce the strong built edge around the Cove and broader expression of the topography and natural shoreline;*

- *Retention of Goods Shed and its incorporation into the Stadium to facilitate public access to the building, allowing patrons and the public to re-engage with the history of the building;*
 - *Maintain appropriate setback and curtilage around the Royal Engineers Building to mitigate visual impacts whilst respecting the setting and cultural heritage significance of the building;*
 - *incorporating significant physical setbacks from the escarpment and the Cenotaph headland which assists in reducing the perception of bulk and scale;*
 - *avoiding overlap between remembrance activities at the Cenotaph and events at the Stadium;*
 - *mitigating impacts on a broader assessment of significant views;*
 - *provision of visual interest by views of, through and beyond the domed translucent roof of the Stadium;*
 - *The proposal and subsequent masterplan and amendments also support mixed-use to meet the objectives of the site for renewal.*
- (op cit. pp79-83)

6.19 It is important to qualify this assessment with an acknowledgement that the form and scale of the proposed stadium is determined by its multipurpose function – predominantly for oval based sport (AFL and cricket) and concert events - with the roof being a requirement of the State Government’s agreement with the AFL. Whilst the shape of the Stadium provides some reference to the former Railway Roundhouse, functionality requires a much larger footprint for the Stadium. These 2 key issues of roof height and overall footprint cannot be ‘mitigated away’ without challenging the functionality of the multipurpose Stadium.

6.20 Further to this, the DFCs relate directly to development envisaged by the Reset Masterplan and as indicated in the Planning Report have little relevance to the PoSS (ibid. p82). Revised provisions will be drafted as part of the subsequent planning scheme amendment process to implement the new Mac Point Precinct Masterplan.

6.21 ***Use areas***

Distinct use areas are provided under Figure 32.1 of the planning scheme (Figure 5 in the Planning Report). The use areas reflect the intention and guiding principles of the Reset Masterplan and SDP 2017 to support a variety of mixed uses within the precinct, but do not envisage the scope or area of the current multipurpose Stadium proposal. As indicated in the Planning Report, the proposal and subsequent masterplan and amendments also support mixed-use to meet the objectives of the site for renewal (op cit. p83).

6.22 ***Building areas***

Figures 32.3 and 32.4 of the planning scheme provide building areas to control the physical form and height of development (see also Figure 6 in the Planning Report). These are intended to maintain key viewlines, but do not contemplate alternative forms or scale of development such as the proposed multipurpose Stadium. Some reconsideration of these building areas is therefore required in respect of the PoSS.

6.23 ***Use & Development standards***

Specific standards were implemented for each of the defined Use Areas. The standards include controls on use, car parking, building heights and design. The controls mainly relate to avoiding

land use conflict between new residential development and Port operations, although under clause 32.7.2 building form is also addressed through the following objectives:

The height and form of buildings are to be:

- (a) Consistent with established building forms within Sullivans Cove;*
- (b) Sympathetic to the natural topography of Sullivans Cove, including the amphitheatre sloping down to the Cove with the headland and escarpment surrounding the Cenotaph forming a natural expression of the Cove Wall;*
- (c) Respectful of the low-lying nature of the site and its visibility from surrounding elevated areas.*

6.24 As indicated in the Planning Report:

Specific building heights and envelopes were implemented through the SDP.

Any extension beyond these heights/envelopes required applications to demonstrate consistency with the streetscape, urban form and character of the surrounding area, having regard to the Desired Future Character Statements, protection of important views, consideration of height in relation to the Cenotaph and overshadowing of public space.

Consideration was also to be given to the following:

- *The individual prominence of the building and its contrast with neighbouring buildings;*
- *The architectural and design merit of the building itself;*
- *The contribution the building will make to Macquarie Point and the City of Hobart more generally in terms of architectural character and quality; •*
- *The extent and nature of the contribution that the building and its use will make to the economic activity of Macquarie Point and in the City of Hobart;*
- *The extent and nature of the contribution that the building and its use will make to the reputation of the City of Hobart as an international destination;*
and
- *The civic amenity of the building.*

In addition, the roof form of buildings must contribute to the articulation of building forms, integration of new buildings and provide architectural interest. Further standards relate to buildings sited within specific building areas/envelopes shown in Figure 32.3 of the SDP:

Clause 32.7.3 – Building Alignment

Objective: That building forms, roads and other public spaces are appropriately aligned.

and

Clause 32.7.5 – Building Alignment – Adjacent to the escarpment (Use Area 2 adjacent to escarpment on Figure 32.1)

Objective: The siting and alignment of buildings adjacent to the escarpment are to be sympathetic to the natural topography of the headland, amphitheatre and escarpment surrounding the Cenotaph and reinforce the natural shoreline.

Buildings were to be sited and aligned to areas of primary or secondary space, as identified in the SDP.

Rooftop mechanical plant was to be contained within the roof structure of any building. If this could not be achieved, consideration was to be given to how such infrastructure would be viewed from the Cenotaph and surrounding area.

(ibid. pp84-86)

6.25 View lines

View lines in the SDP 2017 expand those envisaged in the SCPR up to 11 specific views intended to consider sightlines:

- Across the 'floor' of the Cove;
 - From within the Cove to surrounding landmarks; and
 - From surrounding vantage points (Franklin Square, The Cenotaph, Battery Point).
- (HOBART WATERFRONT PROJECT STEERING COMMITTEE ,Hobart Waterfront Urban Design Framework (2004) p11, cited in Planning Report op cit. p87)

6.26 As noted in the Planning Report (p87), these 11 views (indicated in Figure 32.2 of the planning scheme) were derived from a specific design intent for the site, reflected in the Macquarie Point Reset Masterplan. Further views have been identified in the 2024 SDP and are considered as part of the project documentation, including in the Planning Report (op cit. pp97-145).

6.27 Matters to be considered

I concur with the summary provided in the Planning Report (pp89-90) noting that specific assessments are provided in:

- Appendix A – Architectural D
- Appendix B – Stadium Design Description
- Appendix GG – Site Development Plan (2024)
- Appendix J – Landscape Visual Impact Assessment
- Appendix L – Heritage Impact Assessment
- Appendix I – Urban Design Framework Report

6.28 Mac Point Precinct Plan 2024

The Reset Masterplan and current statutory SDP (2017 - embedded within the SCPS) identify a range of building typologies and uses which respond to a previous vision but are not suitable or responsive to the new vision that includes a multipurpose Stadium.

The Mac Point Precinct Plan 2024 (the **Mac Point Precinct Plan**) provides a revised master plan in a 'structure planning' approach that:

- re-locates the required residential component to the north-east of the Precinct, allowing for building envelopes oriented to the north-east and north-west, providing

significantly improved access to sunlight and greater separation from Port related activities;

- locates the proposed multipurpose Stadium centrally within the Precinct, making use of the historically industrial/commercial bulk of the Site;
- provides for future complimentary mixed/commercial uses within the Integrated Complimentary Mixed-Use Zone and Antarctic Facilities Zone

6.29 ***Vision for the Precinct***

The Vision for the Precinct is set out on page 5 of the Mac Point Precinct Plan which is Appendix JJ of the project documentation, and repeated on page 91 of the Planning Report.

The Planning Report goes on to outline the proposed 5 interconnected Zones that will make up the Precinct, illustrating the style, type of development and built-form that will guide development of the site, providing the foundations for detailed urban design guidelines to be prepared for each Zone (ibid). The Planning Report also (re)states the premise of the necessary provision of the northern access road (an existing project set out in the Hobart City Deal) (ibid).

6.30 ***Character Statements***

A character statement for the Precinct is provided on page 11 of the Mac Point Precinct Plan (repeated on p92 of the Planning Report). I consider that it should be repeated below as it contains comments that align with my earlier assessment of the character of the Site:

Mac Point is part of Hobart's continually transforming waterfront. It is where the hills around the City descend to the Cenotaph headland to meet the River.

Over the last 200 years, industry and infrastructure has reshaped this edge to the City, introducing the reclaimed flat land of the Docks and the working port edge. It is the relationship between these contrasting natural and artificial landscapes that define the enduring character of Mac Point.

The grand scale of the headland and docks impart a feeling of being in a big landscape.

This is contrasted by sheltered, human scaled spaces in the gaps, where informal activity has emerged.

These characteristics create a unique space at Mac Point where a big place can have special, personal experiences.

This Precinct Plan seeks to create a future where Mac Point's rich and layered character will continue and be enhanced by introducing a unique and contemporary urban precinct that ties into the City.

The proposed multipurpose Stadium is Stage 1 within and in accordance with the Mac Point Precinct Plan.

6.31 **Precinct Zones**

The Precinct Zones are shown on p18 of the Mac Point Precinct Plan document, copied in Figure 7 below.

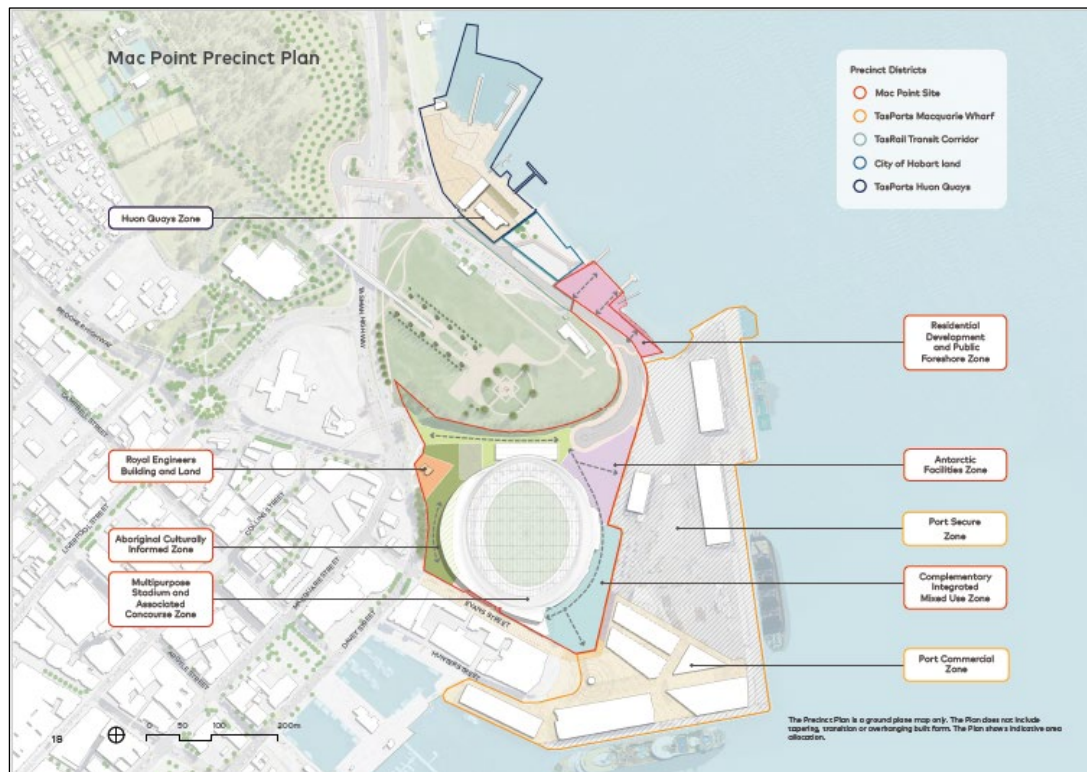


Figure 7: Mac Point Precinct Plan – showing location of Precinct Zones

The Zones include:

- Multipurpose Stadium and Concourse Zone
- Aboriginal Culturally Informed Zone
- Antarctic Facilities Zone
- Complementary Integrated Mixed-Use Zone
- Residential Development and Public Foreshore Zone.

I concur with the explanation summaries provided for each Zone within the Planning Report (op cit. pp93-94).

7. HOBART INTERIM PLANNING SCHEME 2015

- 7.1 The Hobart Interim Planning Scheme (HIPS) 2015 does not apply to Sullivans Cove or Macquarie Point.
- 7.2 Notwithstanding this, the assessment of building height in the Hobart CBD is informed by view lines established via the Building Height Standards Review (WOOLLEY, L. June 2018). The report established prominent views from key locations such as Hunter Street (formerly Hunter Island) and from Constitution Dock. Both viewpoints are directed south-west from the Cove to the CBD and beyond to Mt. Wellington / kunanyi.
- 7.3 Whilst the consequent standards (expressed in the HIPS through DFCSs) have no bearing on Sullivans Cove, the TPC Integrated Assessment Guidelines include several criteria that require a broad level consideration of the surrounding area, beyond the extent of Macquarie Point.
- 7.4 The PoSS Summary Report and supporting documentation address this requirement as part of the expanded viewline assessment, where relevant.

8. HOBART DRAFT LOCAL PROVISIONS SCHEDULES

- 8.1 The Planning Report summarizes the relevant provisions of the Hobart Draft Local Provisions Schedules (LPS) of the Tasmanian Planning Scheme (TPS), noting that they are not yet in effect:

Land use and development of the Precinct within Sullivans Cove and Macquarie Point will be controlled under the following Particular Purpose Zones:

- *HOB-P10 – Particular Purpose Zone – Sullivans Cove*
- *HOB-P11 – Particular Purpose Zone – Macquarie Point*

Both zones essentially translate the existing objectives, considerations and planning requirements under the existing SCPS and Macquarie Point SDP (2017). The Particular Purpose Zone for Macquarie Point has been drafted to continue to implement the vision and objectives of the former Macquarie Point Reset Masterplan 2017-2030. The Reset Masterplan will be replaced with the new Macquarie Point Precinct Plan (the Mac Point Precinct Plan 2024). As the TPS is likely to be in-effect toward the end of 2024, a planning scheme amendment will be prepared to implement the new Macquarie Point Precinct Plan, replacing the proposed HOB-P11 - Particular Purpose Zone, Macquarie Point, with a new Particular Purpose Zone, introducing use/development standards that align with the new vision outlined in the Precinct Plan. (op cit. p96)

- 8.2 Under the foreshadowed *Tasmanian Planning Scheme - Hobart*, it is anticipated the Precinct will be subject to the following Codes and associated overlays:

- C6.0 - Local Historic Heritage Code

The Royal Engineers Building falls within a Local Heritage Precinct and area of Archaeological Sensitivity. Matters relating to heritage and archaeology have been addressed in the accompanying Historic Heritage Impact Assessment and Archaeological Assessment Report (PLANNING REPORT op cit).

- C11 – Coastal Inundation Hazard Code

The accompanying documentation Appendix U demonstrates the Site is not subject to coastal inundation.

9. PLANNING ASSESSMENT

9.1 Existing Urban Form

Physical properties and influences

Appendix I of the project documentation (Urban Design Framework) provides an outline of the physical properties of the Site and surrounding area including topography, geology and geomorphology, existing buildings and spaces (op cit. pp32-40).

Arising from these descriptions is the significance of the following influences:

- Re-routing of the Hobart Rivulet;
- Reclamation and the creation of the 'Cove Floor';
- Excavation to enable railway lines (and the effect of making the 'escarpment' below the Cenotaph more prominent);
- Industrial, port and railway use and development.

9.2 ***Landscape and visual character***

Landscape and visual character is described in the Planning Report (op.cit pp107-110) in direct response to the criteria 4.1.1 to 4.1.3 of the Guidelines. I generally concur with that analysis which is derived directly from Appendix J of the project documentation (Visual Impact Assessment) and the 2024 SDP.

In addition, I make the following comments.

It is stated on page 107 of the Planning Report that:

The built form and character of the Cove is heavily influenced by its history, reflected in numerous existing historical buildings and landmarks and urban design considerations, including:

- *Strong and consistent built edges to streets and public spaces; and*
- *General consistency in built form and architectural design, in terms of building heights, massing, scale, materiality and exterior detailing.*

These elements have been key in establishing the urban, historic and visual landscape character of the Cove, heavily influencing the design of new buildings and spaces.

9.3 I agree with the general statement regarding the influence of historical use and development, however, for reasons previously outlined in my report I do not accept that to mean that either Sullivans Cove overall presents a homogenous character, or that the context for redevelopment of the project Site is a built form and architectural design found elsewhere in the Cove. The history of the project site has been more dynamic than elsewhere in the Cove, and its predominant use and development has been in association with railway and associated transport.

9.4 I also do not agree with the first dot point in the above statement on the basis that the predominant railway use and development did not present a strong and consistent built edge to streets (ie Evans Street) and public spaces (ie the Cenotaph) (see Figures 8 and 9 below).



Figure 8: Figure 5.5.5 from Appendix M (*Historical Archaeological Assessment op cit. p48*) showing a fragmented and inconsistent built edge to Evans Street and inconsistent building form in 1924.

- 9.5 Notably, in these images there are a number of structures of varying sizes, heights, and geometric shapes ranging from the Railway Roundhouse, gasometers, chimney stacks to the Goods Shed and various workshop buildings. The materiality of these structures ranged from masonry (brick, sandstone and renders) to cladding (metal, wood and asbestos). Consequently, I also do not agree with the second dot point in the statement insofar as I do not perceive a “general consistency in built form and architectural design, in terms of building heights, massing, scale, materiality and exterior detailing”.



Figure 9: Figure 5.5.6 from Appendix M (*Historical Archaeological Assessment op cit. p49*) showing a fragmented and inconsistent built edge to Evans Street and the Cenotaph, and inconsistent building form in 1946.

- 9.6 I note and agree with the description of the 'Escarpment' (Planning Report op cit. p108), outlining the alteration of its natural form and shape as a result of successive and varying uses. In my opinion the gentler transition of the original escarpment slope has been removed over the years and replaced by a more defined and severe edge, making the escarpment a more prominent feature than it was before the development of the railway. These can be seen quite graphically in Figure 9 above, where the gentler slope to the east of the Cenotaph contrasts with the sharper cut to the south.
- 9.7 With respect to the 'Cove & Cove Floor' (ibid. p109) there are further 'outliers' that are not listed:

- The Grand Chancellor Hotel (12 storeys)
- Federation Concert Hall (7 storey equivalent)
- Zero Davey Apartments (7 storeys)
- IXL Apartments (5 storeys)
- Marine Board Building (10 storeys)
- Hydro Building (13 storeys).

9.8 If these buildings are added to the list provided in the Planning Report, then there are 10 buildings overall on the Cove Floor that exceed the 4 storey ‘generalisation’ that has been applied. With the exception of the IXL Apartments, these buildings do not have long linear forms, but are given prominence by their bulk, scale and height. In contrast to the project Site, which is hidden from general views within the Cove, these buildings stand on the Cove Floor and are prominent.

9.9 In respect of the ‘Wall of the Cove’ the Planning Report does not attach any significance to the differentiation between the ‘built wall’ of buildings in Hunter Street, and the ‘natural wall’ of the escarpment. Figure 6 in the planning scheme does distinguish between the “strong edge” of the built wall in Hunter Street, and the “topographic sense of wall” at the southern and eastern edge of the Cenotaph promontory (see Figure 10 below).

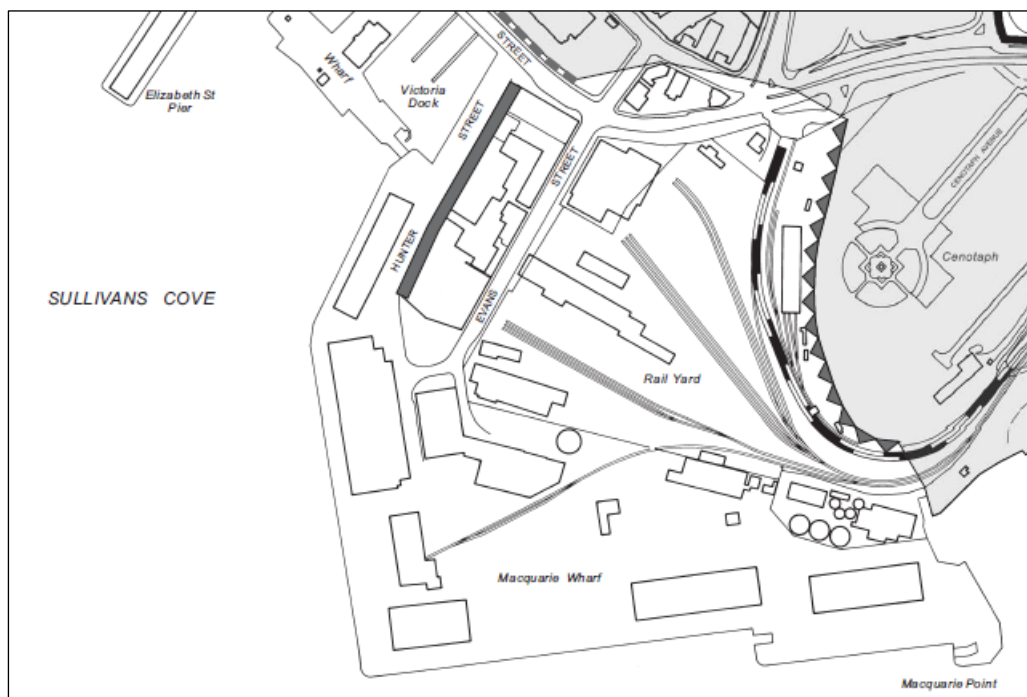


Figure 10: excerpt from Figure 6 in the planning scheme, showing the “strong edge” of the built wall in Hunter Street, and the “topographic sense of wall” at the southern and eastern edge of the Cenotaph promontory.

9.10 The current SDP provisions in Part F of the planning scheme do not provide any clear guidance on how to address both the built and natural walls in respect of the space between them, other than in clause 32.7.5 which refers to the prescribed building envelopes as an Acceptable Solution, or consistency with the DFCSs under clause 32.3 as an alternative Performance Criterion. The relevant DFCSs seek to:

- *Reveal layers of the changing nature of Macquarie Point over time through expression of the topography, natural shoreline, Round House, Goods Shed, Royal Engineers Building and Red Shed (clause 32.3.1);*
- *Acknowledge the footprint of the former railway Round House as shown on Figure 32.3 and the associated Table 32.3 (clause 32.3.4); and*
- *Require the bulk, siting and height of buildings to be sympathetic to the natural topography of the headland, amphitheatre, and escarpment surrounding the Cenotaph and to reinforce the natural shoreline with freestanding buildings viewed in the round on the Cove Floor (clause 32.3.7).*

9.11 The buildings in Hunter and Evans Street, as well as the Mac1 and Mac 2 buildings obscure the natural wall from views elsewhere in the Cove. As such these buildings (the 'built wall') are the predominant 'wall' feature, and the escarpment is largely inferred – only being visible in parts from Evans Street and within the project Site. Figures 32.1 and 32.3 of the planning scheme specify building areas across the face of most of the escarpment, so it is difficult to reconcile those prescribed outcomes with the abovementioned DFCs: apart from aligning buildings approximately parallel to the horizontal alignment of the escarpment. If I am correct in my analysis then the key objectives in the case of the escarpment/natural wall appear to be:

- Follow the horizontal alignment of the escarpment; and
- Do not project above the escarpment.

Even so, the ability to view freestanding buildings in the round, will not be possible in Building Envelope A, will be not practically possible in Envelope G, and will be limited in Envelope H (see Figure 11 below).

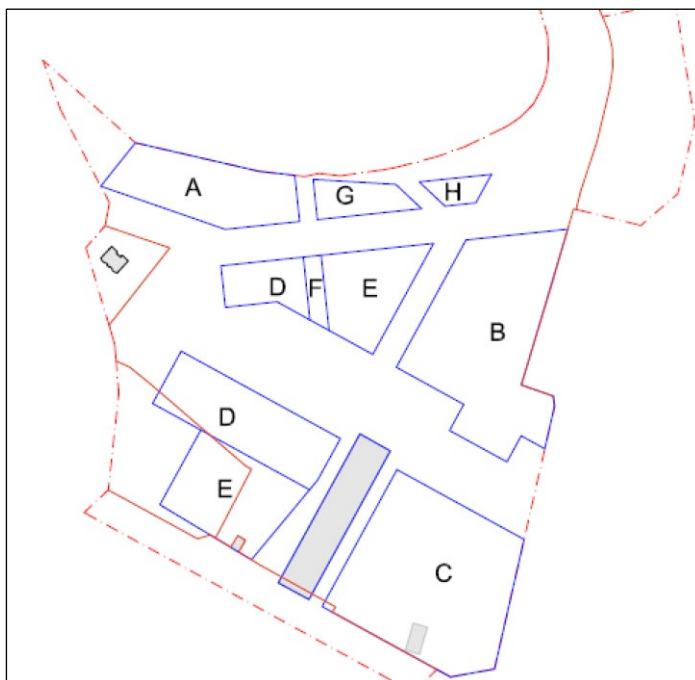


Figure 11: excerpt from Figure 32.4 in the planning scheme. Envelopes A, G and H are aligned at the base of the escarpment.

- 9.12 This level of ambiguity is further compounded in the case of the new vision sought for the multipurpose Stadium: the required curvilinear footprint of the playing surface and concourse cannot practically be designed to reflect the alignment of the escarpment. Accordingly, the curved element of the northern side of the Stadium has been set back the maximum possible, and the Goods Shed interposed to provide a lower and more rectilinear building form with pedestrian space and landscaping providing a further buffer to the escarpment. This setback also allows the Stadium to be viewed in the round, which is a stated objective. Notwithstanding the circular footprint and the ability to reveal the escarpment through setbacks, the concept of the Stadium in terms of shape and scale is not capable of fitting the smaller rectilinear parcels prescribed in the current (2017) SDP. As indicated earlier the current SDP provisions in Part F of the planning scheme were produced to address a previous vision for redevelopment of the Site and are not practically applicable to the new vision. A new SDP is required pursuant to Part F of the planning scheme and the 2024 SDP seeks to provide appropriate new parameters.
- 9.13 The 2024 SDP suggests that whilst the Hunter Street buildings provide the current built wall to the Cove Floor, the project Site sits within the spatial typology of the Cove Floor and should therefore be treated as a large area of the Cove Floor (Planning Report op cit. pp98-99). The Planning Report paraphrasing the 2024 SDP also states:
- *The escarpment is a remnant of the prior coastal landform and a topographical expression of the wall, and therefore any development on the Site should ensure that the escarpment remains legible as a landform (ibid. p98).*
 - *Buildings should be freestanding and designed in the round as buildings in space, rather than buildings forming a linear wall, or within radiating streets (ibid p99).*
 - *Whilst the current planning controls under the SCPS identify a traditional urban pattern which should be conserved, the peripheral areas including the CSIRO and Macquarie Point site also contain larger format use/development, driven by functional requirements and located on larger consolidated lots (ibid).*
 - *the urban context of the site allows for, and has historically accommodated larger scale utilitarian and generally unadorned buildings where scale was dictated by function (ibid).*
 - *What constitutes appropriate scale and form is influenced by the spatial typology of any area, and in acknowledging this, the SDP (2024) concludes that buildings on Mac Point can be large and possess a significant footprint with an all-round expression, whilst being functional and modern without overwhelming of the broader context. New structures on the floor should be light and utilise transparency and materials to reduce the visual dominance that their larger scale and form might otherwise present.¹⁸ This can be achieved without detracting from the smaller, finer grained historic and industrial setting. Visual impacts can also be managed without distorting the different building and spatial typologies that are found in traditional areas across the Cove floor (ibid).*
- 9.14 Whilst recognising that the subject site presents as somewhat of an anomaly, encompassing a significant area of largely undeveloped land on the outer edge of the established Cove Floor, it represents a unique opportunity for urban renewal (ibid. p102). It also provides potential for an area of transition from the densely developed urban area of Sullivans Cove to the open space of the Domain. Considering the significant curtilage surrounding the proposed Stadium,

the pedestrian links to the Cove, the Cenotaph and the Domain, vehicular and transport links, the Planning Report concludes that:

The overall footprint, spatial typology and broader urban typology of the surrounding area is reflected in the design, scale and siting of the stadium which recognises the distinct transition from urban to open space. (ibid)

9.15 Accordingly I concur with the conclusion presented by the Planning Report that:

Whilst the Stadium represents a departure from the development envisaged within the Macquarie Point Reset Masterplan, the proposal and broader Precinct Plan adopt a range of similar urban design elements that directly respond to the values and characteristics of the Cove, including but not limited to:

- Provision of activate frontages and new areas of ‘primary’ and ‘secondary’ space.*
 - Prioritisation of pedestrian movement and connectivity.*
 - A new building designed to be read and interpreted ‘in the round’*
 - Retention of significant curtilage to identified buildings and places of cultural significance, which mitigates the perception of bulk and scale.*
- (ibid. p103)

9.16 ***Heritage places & character***

The Heritage Impact Assessment prepared as part of the PoSS provides an independent, expert analysis of the impacts of the proposed development on the heritage places within the study area, including cumulative impacts of the broader setting and context of central Hobart and Sullivans Cove. This has been augmented by expert advice from Jim Gard’ner (18 June 2025). Accordingly, I defer to those experts in matters of heritage assessment and opinion.

9.17 ***Established views***

As outlined in the Planning Report (pp110-111) the SCPR identified several key views to and from the Cove and key landmarks – principally the Cenotaph and across the Cove. The planning scheme expanded on this through the introduction of the SDP 2017 which aligned with the development vision under the Reset Masterplan. Figure 32.2 in the planning scheme illustrates these view and sightlines (see below).

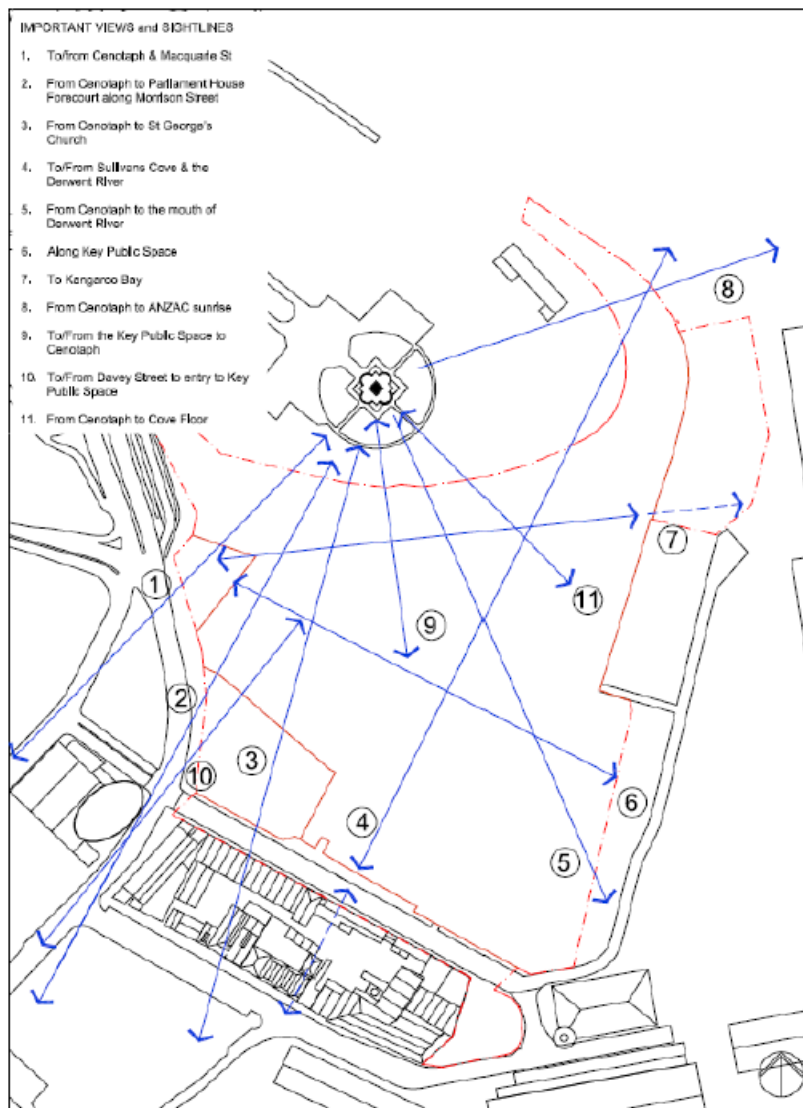


Figure 12: Figure 32.2 in the planning scheme – views and sightlines.

- 9.18 The prospect of a new vision for the redevelopment of the Site has led to consideration of further viewpoints to add to the interpretation of historical landmarks and the broader landscape/urban typology of the city (Planning Report op cit. p112).

The 2024 SDP provides a review of the significance of existing viewpoints and potential new viewpoints, notably concluding that:

9.19 Views to and from the Hunter Street buildings

The presence of contemporary built forms behind Hunter Street ... does not unreasonably dominate the view or negatively impact the ability to interpret these building forms, due in part to the following factors:

- *The Hunter Street buildings and their dominant facades are only partially seen, and are situated within a backdrop of more recent buildings;*
- *The Cenotaph and its landscape setting is already considerably obscured;*
- *The presence of large scale wharf buildings provides a point of contrast which emphasizes the different typologies; and*

- *The immediate proximity to the Hunter Street buildings provides for the singular experience of the buildings without any built backdrop. The objective is to ensure that this opportunity is retained by ensuring any new buildings on the Mac Point site to not intrude into this viewscape.*
(Planning Report op cit. pp113-114)

9.20 Views from Battery Point

Comparing views from Kelly Street, Stowell Avenue and Montpelier Retreat:

...whilst the layered landform of the Cove, the Cenotaph and distant landform is visible, most of the Mac Point site is out of view. This appears to be a result of foreground screening elements along these streets, such as trees and buildings and the layered built form across the Cove.(ibid. p115)

Contemporary buildings such as the IXL Apartments and Zero Davey provide an additional layer of roof forms which partially screen views of the Site. A further important point is that the current absence of buildings (and therefore roofscape) on the Site is “unusual in its long history” (ibid. p116). A variety of buildings including gasometers, workshops, railway sheds and chimney stacks would have at various times in the past provided a visual layer between the Hunter Street buildings and the Cenotaph.

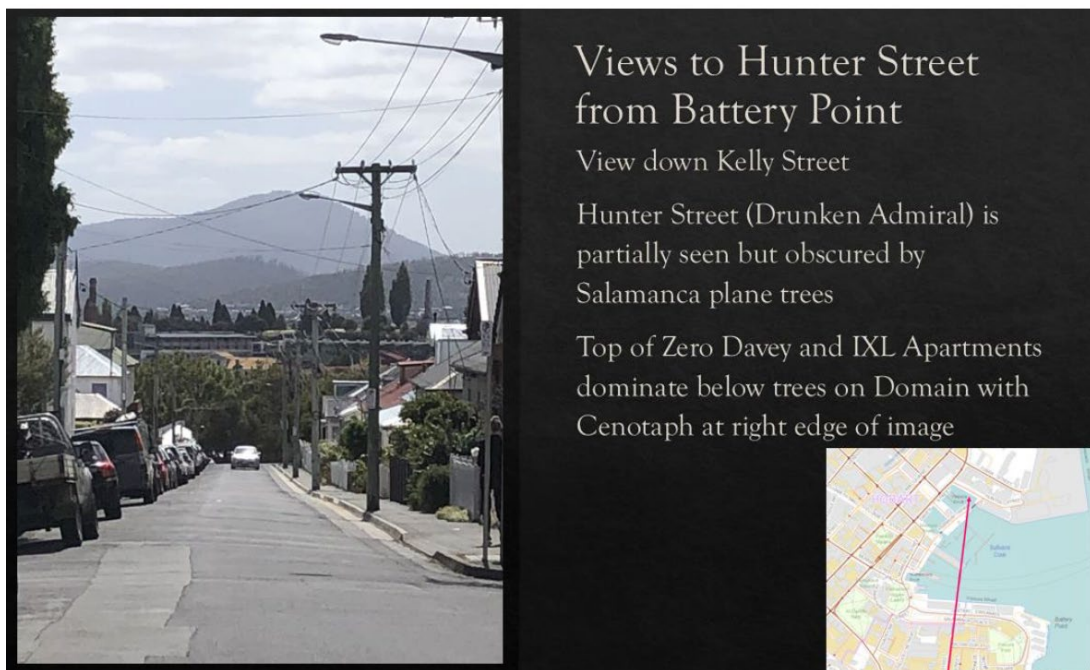


Figure 13: Figure 48 from the 2024 SDP.



Figure 14: Figure 30 from the 2024 SDP showing a closer view of the additional layer of buildings and roof structures behind the Hunter Street buildings (view from southern side of Victoria Dock)



Figure 15: Figure 56 from the 2024 SDP showing a different angle of the additional layer of buildings and roof structures behind the Hunter Street buildings including port - related structures (view from TMAG building). The building on the far left is situated on the former site of a gasometer.

10. PROPOSED BULK, FORM AND SCALE

10.1 Design Response

According to the objectives of the planning scheme the traditional urban pattern of Sullivans Cove is to be conserved whilst a contemporary adaptation is to be created in development/redevelopment areas. I have indicated earlier why I consider the application of a 'traditional urban pattern' to the project Site to be problematic: which stage of the historical use and development of the Site should be adopted?

10.2 Whilst the multipurpose Stadium addresses some of the desired outcomes:

- Responding to built and landscape character;
- Responding to heritage values;
- Providing pedestrian and transport links;
- Enlivening an underused space;
- Providing recreational, entertainment and mixed-use opportunities;

the functional and user requirements of the Stadium necessitate a building of significant scale which will be prominent. The Planning Report identifies the elements that necessarily contribute to the overall design, bulk, form and scale as being:

- *Appropriate physical dimensions to accommodate a field of play, able to support a range of sports and event activities – along with a seated capacity of 24,500.*
- *A fixed roof, for all-weather use (a requirement imposed by the AFL);*
- *Sufficient space for all associated support and operational services, rooms and facilities. This includes consideration of football and cricket ball trajectory in establishing the clear height required under the roof. Additionally, the underside of the roof needs to make allowance for structural elements as well as suspended lighting, speakers, and fans to support the patron experience within the Stadium.*

(op cit. p116)

10.3 I concur with the Planning Report's assessment, notably that:

The dome-like roof form allows the stadium's outer edges to be lowered to a height that falls away in each direction, providing a considered response to adjoining/adjacent buildings and landforms. This approach assists to reduce the apparent height of the building, whilst still achieving the functional height above the playing field (ibid. p117).

A significant consideration is that the building will always be viewed in perspective rather than 2-dimensional elevation. In other words, because of the curved façade and domed roof, the entirety of the building will not be visually appreciable. The interposition of landforms, other buildings, and vegetation will also mitigate the ability to view the entirety of the structure at one time. I agree that the generous curtilage will reinforce the concept of the Stadium sitting on the Cove Floor, whilst also allowing the relationship between the building's footprint and height to be appreciated as "proportionate and contextual" within the industrial setting (ibid. p118).

10.4 Evans Street elevation

The Planning Report (p.119) demonstrates that whilst the overall height of the Stadium is greater than the buildings in Evans Street, the domed roof reduces at the street-edge to a

height “broadly reflective” of the taller existing buildings (Zero Davey and IXL Apartments). It is acknowledged that the overall scale of the Stadium is greater due to the functional requirements of the Stadium, but the reduced height and proposed articulated façade create a reduced scale when viewed at pedestrian level. This is demonstrated in KOP 06 of the Orbit Solutions Visual Amenity Evidence (VAE) attached to Mr Goss’ Statement of Evidence (see below).



Figure 16: excerpt from KOP 06 of the Orbit Solutions Visual Amenity Evidence – Evans Street / Hunter Street Intersection looking north-west

10.5 Davey Street (west) elevation

The Planning Report notes the significant separation distance between the Stadium and the Federation Concert Hall (79.5m) and the Grand Chancellor (140m). The façade height of the Stadium at this elevation is approximately 22m which generally reflects that of the Concert Hall. The substantial setback, incorporating a large forecourt to the Stadium in this location will reduce the perceived height bulk and scale of the building, with the domed roof not being visible at pedestrian level from this viewpoint (see Figure 17 below). I agree with the Planning Report’s assessment that the use of lighter and more varied external materials (than the Grand Chancellor and Concert Hall) also provides greater articulation, depth and visual interest such that the level of impact is insignificant from this viewpoint (ibid. p120).



Figure 17: Figure 18 from the Planning Report - artistic impression looking east from the intersection between Davey Street, Macquarie Street and Brooker Avenue (source: COX Architects)

10.6 Royal Engineers Building (northwest elevation)

The design and siting of the Stadium provides approximately 16m of separation between the rear of the Royal Engineers Building and the closest point of the Stadium concourse, and approximately 13m separation from the practice wickets which sit below ground level. Whilst not a significant distance, the physical separation reduces the perceived scale and bulk of the Stadium, retaining the ability to interpret and appreciate the Royal Engineers Building 'in-the-round'.

10.7 It is proposed to augment existing vegetation around the Royal Engineers Building and along the escarpment with new landscaping within the Site and along the escarpment edge. This is expected to further soften the north-western edge of the Site and contribute to the visual transition (ibid. p121).

10.8 Views of the Royal Engineers Building from Macquarie Street will not be impacted by the Stadium.

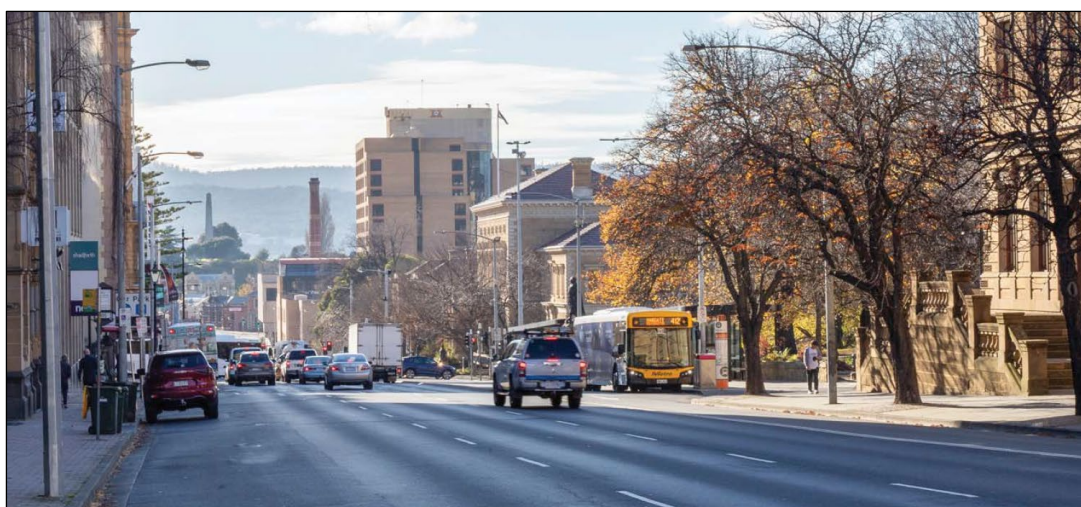


Figure 18: Montage view down Macquarie Street towards the Royal Engineers Building, with the Stadium hidden behind intervening buildings (source: SLR view 5)

- 10.9 From Brooker Avenue, the Stadium will provide a built mass as a solid backdrop to the Royal Engineers Building, although this will be mitigated to some extent by tree plantings/landscaping and the differential materiality of the Stadium. The montages provided in the VAE indicate that the lighter colouring of the Royal Engineers Building will highlight it against the more recessive darker shading of the Stadium, enabling them to be interpreted as 2 separate structures. Historically the Royal Engineers Building would have been viewed against a backdrop of larger industrial buildings, and at some periods included outbuildings and other structures amongst its immediate curtilage. The current relatively unencumbered background to the Royal Engineers Building is a product of recent clearing of the Railyards and the project Site and historically is not an enduring view.



Figure 19: excerpt from KOP 16 - from corner of Collins Street & Brooker Avenue (source: VAE)

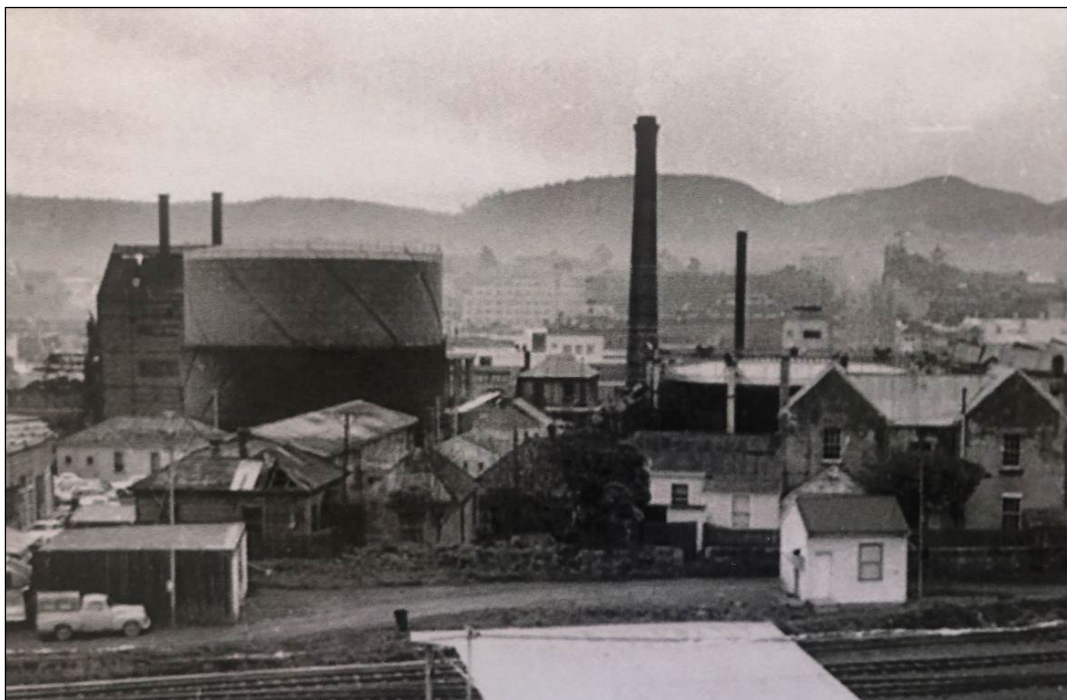


Figure 20: The Royal Engineers Building in the right of the picture, surrounded by other buildings and industrial structures (estimated circa. 1960) (source: 2024 SDP, p30)

- 10.10 The Planning Report points to the Mac01 Hotel development and Tasman Hotel as examples of contemporary forms of development successfully juxtaposed with heritage buildings in Sullivans Cove. Whilst I accept that the Stadium reflects a similar principle, in my opinion the difference in scale and bulk require some intervening mitigation. The montages provided by SLR, whilst not adopted in respect of the colour and bulk of the Stadium, do suggest that this can be achieved quite successfully with careful plantings (see Figure 21 below).



Figure 21: montage view from Brooker Ave - proposed development with planting (source SLR)

10.11 The GasWorks

I agree with the Planning Report's assessment (referencing SLR viewpoint 18) that the significant separation between the Stadium and the GasWorks, combined with substantial existing tree screening will provide an adequate visual transition.

10.12 The Cenotaph/north elevation

The Planning Report considers that the separation distance between the Stadium façade and the base of the Cenotaph (approx. 106.2m) and the relative rise in topography to the Cenotaph assist in mitigating the perceived height and overall scale of the Stadium, evidencing a partial north-south site section provided by Cox Architects (Planning Report op cit. p123).

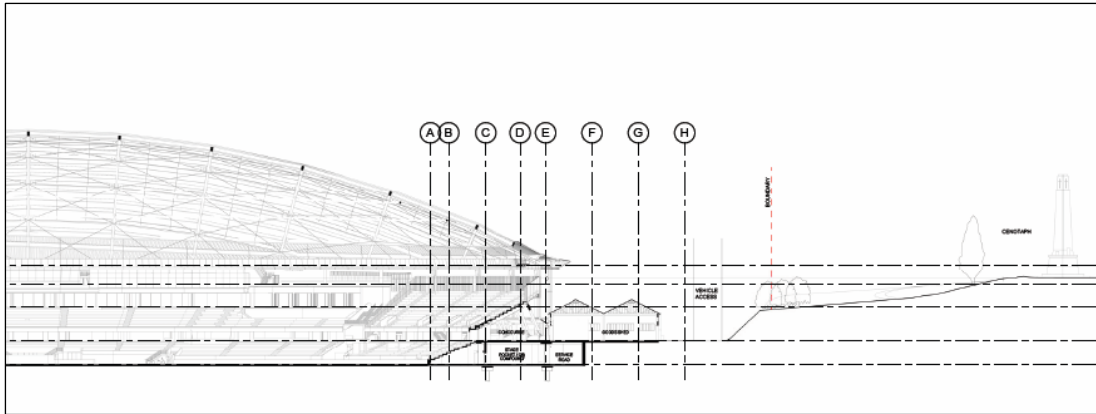


Figure 23: Partial site-section showing relationship with the Cenotaph (source: COX Architects)

Whilst this demonstrates that the walls of the Stadium are close to the height of the base of the Cenotaph, and should therefore have limited impact on views to and from it, it does not overcome the more obvious perception of visual impact of the Stadium roof, which the partial site section indicates to be above the top of the Cenotaph, and (from further visual images to be commented on below) would be prominent in views to and from the Cenotaph.

- 10.13 In one sense the height of the domed roof is an assistance in reducing impact: the centre of the dome has the maximum impact whilst the impact diminishes towards the edge of the dome. An equivalent flat, skillion, gabled, hipped or pyramidal roof would have a far greater height, bulk and overall profile in order to provide the necessary internal dimensions to meet functional parameters. The proposed domed roof is therefore the most benign option short of having no roof at all.

Figures 24 and 25 below confirm that it is the roof of the stadium that has the greatest impact on the Cenotaph.



Figure 24: Cenotaph and Stadium viewed from Anzac Bridge (VAE, KOP 02)



Figure 25: Stadium viewed from base of the Cenotaph (source: VAE KOP 03)

10.14 A roof is a fundamental requirement of the Stadium proposed in the PoSS. In order to fulfill that requirement a domed roof is considered the most suitable design.

10.15 Expression of the Cove Wall/Floor

The Planning Report considers that:

- *The domed form and scale of the Stadium reads as an extension of the headland along the natural northern end of the Cove, reinforcing the sense of enclosure;*
- *The extension of the perceived headland outwards towards the Estuary is not detrimental to the overall landscape values as it keeps in character with the existing landscape;*
- *The proposal uses a series of horizontal elements and contrasting facade materials to break down the form of the building, providing greater articulation and depth which works to reduce the visual impact of its mass;*
- *The articulated roof edge works to draw emphasis to this lower roof edge height and street wall, rather than the maximum height of the roof at its centre, allowing the Stadium's dome to be read in perspective, whilst creating a greater sense of separation and curtilage to, and around existing built forms and landscape elements. Such elements include the 'escarpment' edge below the Cenotaph and the Royal Engineers Building, enabling the Stadium to be interpreted and read as a building 'in the round'.*

(ibid. p125-126)

I agree that the shape of the dome and the varying setbacks are beneficial in reducing peripheral impacts, and allowing the building to be read in the round. However, the height of not just the centre of the dome, but most of its profile rises above the escarpment and would dominate the immediate landform of the Cenotaph promontory. Because of the light shaded

man-made materiality of the roof it would not 'blend' with the green and brown shades of the Cenotaph promontory and the lower Domain. In my opinion reference to a simulation or extension of the natural landscape is fallacious and the roof should rely for justification on its functional need and design parameters.

10.16 Materiality

I concur with the Planning Report's description and appropriateness of the choice of materials for construction and finishing, to the extent that my expertise is relevant.

I note that cladding is to be employed and consider that this is not inconsistent with the use of cladding historically in railway buildings in the Site, and elsewhere in Sullivans Cove such as the Mac 01 Hotel buildings, the IMAC building, Davey One, the Mures Fish Centre and Mawsons Hut.

10.17 Landscape and Activation

I agree with the Planning Report's assessment that the proposed Stadium will be "unavoidably prominent" (ibid. p128). Its bulk, height and scale are a direct result of its functionality. Notwithstanding that, it sits within an historically industrial setting and reflects many of the characteristics of the various uses, developments and materiality associated with the Site over time.

As outlined in the Stadium Design Description, the interface of the stadium with the external public realm ensures a fine-grained scale and multilayered experience, ensuring activation on both game and non-game days, human scale and sense of enclosure, leading to a sense of awe and scale on entering the stadium (ibid).

The hard and soft landscape elements will provide human scale elements, within the context of a large site and the feature built-form element (ibid. p127).

The visibility of the Stadium in terms of height will signify a clear direction for events, public gatherings, and the surrounding cultural spaces. As such, negative perceptions about the visual prominence of the building must be balanced against the desired role and functionality of the proposal in the chosen location.

10.18 **Landscape Visual Impact**

The Landscape Visual Impact Assessment (**LVIA**) dated 25 June 2025 and Visual Amenity Evidence (**VAE**) dated 24 June 2025 attached to Mr Goss' Statement of Evidence consider 16 viewpoints (Key Observation Points or '**KOPs**') overall to demonstrate the potential visibility of the proposed development when viewed by sensitive receptors within its surrounding context:

KOP 01 - QUEENS DOMAIN TASMAN BRIDGE
KOP 02 - BRIDGE OF REMEMBRANCE
KOP 03 - HOBART CENTOPATH
KOP 04 - ROSNY HILL LOOKOUT
KOP 05 - ROSNY HILL COASTAL RESERVE
KOP 06 - EVANS STREET
KOP 07 - MOUNT NELSON LOOKOUT
KOP 08 - BATTERY POINT HEADLAND

KOP 09 - PARLIAMENT GARDENS (SALAMANCA)
 KOP 10 - WATERSIDE PAVILLION CONSTITUTION DOCK
 KOP 11 - VICTORIA DOCK BRIDGE
 KOP 12 - MOUNT STUART LOOKOUT
 KOP 13 - RAILWAY ROUNDABOUT BROOKER AVENUE
 KOP 14 - COLLINS STREET / BROOKER AVENUE
 KOP 15 - MACQUARIE STREET / EVANS STREET
 KOP 16 - TASMAN HIGHWAY / BROOKER AVENUE

10.19 ***Qualifications, Assumptions and Limitations***

- I rely on the technical methodology of Mr Goss and assume that he has applied it correctly.
- His analysis, evaluation, and conclusions therefore provide a context for my assessment.

10.20 ***Relevant Methodology***

For pragmatic purposes as a land use planner, and without meaning to trivialize Mr Goss' work, I have distilled the following key elements that assist me to understand the methodology and analysis carried out by Mr Goss.

10.21 ***Assessment of Scenic & Visual Landscape Character***

The initial process involves the creation of a clear, hierarchical framework of Landscape Character Types (LCTs), Landscape Character Areas (LCAs), and potentially Landscape Character Zones (LCZs) (GOSS, C. LVIA, p79).

- 10.22 This foundational classification serves as the essential baseline for subsequent, more detailed assessments of Scenic and Visual Landscape Values, enabling the determination of the Visual Absorption Capacity (VAC) of each specific zone within the visual catchment area of a proposed development (ibid). VAC is:

the degree to which a landscape can tolerate visual change from a proposed development. Landscapes with higher scenic and visual values, and those prioritised for preservation or enhancement, are inherently more sensitive to visual change and thus have a lower capacity to absorb it. Conversely, landscapes with lower scenic and visual values have a higher capacity to absorb change (ibid. p143).

- 10.23 Scenic and visual landscape values are identified and prioritised based on the Visual Magnitude, Contribution, Prominence, and Permanence of each LCZ. This prioritisation process considers the potential magnitude of visual impact of development on specific values, the tangibility of that impact, its specificity to the site, and the extent of people and places likely to be affected (ibid. p120).

- 10.24 Ultimately a 'Magnitude of Change' is assessed for the proposal for each LCZ, which allows firstly a quantitative evaluation for each LCZ leading to a conclusion regarding visual compatibility. On pages 360 to 362 of Mr Goss' assessment he indicates that the magnitude of change for each LCZ is 'moderate', and visual compatibility is 'satisfied'.

10.25 Finally, Mr Goss provides a qualitative evaluation, responding to the IAR Guidelines and matters raised by Representors. The findings relevant to my assessment are addressed below.

10.26 **Evaluation**

Location

The following evaluations and conclusions are relevant to my assessment:

- *The LVIA has demonstrated that there are a range of visual sensitivity classifications that pertain to the various Landscape Character Zones and that a fulsome Landscape and Visual Character Assessment is required to make a fully informed assessment that gives weight to what is otherwise a broadly subjective opinion (ibid. p364).*
- *whilst the Stadium may be visible from various elevations on the mountain, potential impacts on the visual relationship between the city's urban fabric and its natural mountainous setting will not be unreasonably impacted. Consideration of the stadium's roofline and upper massing sees that it sits beyond the CBD and the large hotels, office buildings and warehouses at the waterfront. The '5th elevation' of the roof is seen against the backdrop of the river and the colouration will integrate with the waterbody. From both the Pinnacle and The Springs and other elevated locations within Wellington Park the visual magnitude of the Stadium will not be overbearing (ibid.).*

10.27 **Siting**

The following evaluations and conclusions are relevant to my assessment:

- *River Derwent Setbacks: The proposed design features generous setbacks from the River Derwent, establishing an expanded public promenade that visually and physically extends the waterfront experience. This ensures the building does not appear to as an intimidating form at the water's edge, preserving the expansive visual corridor of the Derwent (ibid. p366). The significant setbacks and integration of a public foreshore visibly enhance connections to the Derwent, allowing uninterrupted views from the stadium precinct to the river. The translucent roof also means the sky and a sense of connection to the broader environment are maintained from within the stadium (ibid. p367).*
- *Evans/Hunter Street Proximity: Towards the Evans/Hunter Street heritage precinct, the stadium's lower levels are set back and articulated, and integrated with smaller-scale elements, to create a gradual transition in scale. This attempts to prevent an abrupt visual walling-off of the historic streetscape, maintaining visual permeability and respecting the existing urban grain (ibid p.366).*
- *Relationship to The Domain and Cenotaph: The stadium's placement to the south-east of the Hobart Cenotaph and the Queen's Domain is a key aspect of its siting. ... this specific orientation means the stadium cannot cast a shadow over the Cenotaph or impact sunrise or sunset. The northern edge of the stadium precinct is intended to connect to the Queen's Domain, which includes the Cenotaph. The intent is to create a seamless flow and integrate the stadium into this broader green space, fostering a visual relationship that frames the Cenotaph and the Domain as part of a dynamic urban landscape, rather than a disconnected imposition (ibid. p366). While concerns have been raised regarding the stadium's visual relationship with the Cenotaph and Queen's Domain, a historical perspective unequivocally demonstrates that the visual*

context of this revered memorial has been one of continuous evolution, not static preservation (ibid. p367). Significant, large-scale transformations have continuously redefined the Cenotaph's visual and physical relationship with its surroundings (ibid.)

- *The primary orientation maximises broad-scale visual connections. It allows for the creation of new framed views from within the precinct and the stadium itself, extending the visual experience to the vast expanse of the Derwent and the dramatic backdrop of kunanyi/Mount Wellington (ibid. p369).*

10.28 Design

The following evaluations and conclusions are relevant to my assessment:

- *The specific design choices of the Macquarie Point Stadium demonstrably ensure a satisfactory visual impact from all Landscape Character Zones, thereby achieving the requisite Visual Absorption Capacity for this vital urban development. The design is a sophisticated response to Hobart's unique visual character, actively integrating the stadium as a positive and enduring addition to the cityscape.*
- *The stadium's architectural design is not merely aesthetic; it is a meticulously crafted visual strategy that addresses each Critical Visual Influence (CVI) with precision, ensuring harmony and appropriate contrast within Hobart's diverse visual landscape.*
- *This draws directly from this LVIA's CVI analyses (Scale, Line, Form/Shape, Texture, Spatial Character). (ibid. p371)*

10.29 Mr Goss provides a further expansive and detailed evaluation of various elements of the design from an expert architectural perspective (pp371-378) that I do not seek to repeat. These include evaluations of:

- Scale;
- Line;
- Form/shape;
- Texture;
- Overall Cohesion;
- Architectural and Landscape Design;
- Symbiotic relationship with Heritage (in Sullivans Cove); and
- Signage.

10.30 Mitigation

Similarly, Mr Goss provides a detailed evaluation of mitigating elements of the design from an expert architectural perspective (pp-379-383) that I do not seek to repeat. These include evaluations of:

- Scale & Bulk Modulation;
- Articulated Facades & Layering;
- Contextual Materiality & Texture;
- Visual Permeability;
- View Framing;
- Cenotaph-Specific Siting;
- Landscaping Interventions;
- Operational Controls (Inferred for Visual Amenity);

Mr Goss concludes that:

These measures ensure that the stadium will integrate successfully, contribute positively to Hobart's visual character, and sustain its visual amenity over the long term (ibid. p383)

10.31 Cenotaph

Mr Goss provides a focused evaluation of the impact of the Stadium on the Cenotaph (pp304-385). I do not seek to repeat it here, but refer to it as relevant in my own assessment of the visual impact below.

10.32 **Assessment of landscape visual impact**

Consideration of queries arising from the Tasmanian Heritage Council (THC) and specifically around the bulk, scale, and appearance of the Stadium in relation to heritage listed buildings within its immediate visual context are provided under separate cover in the Statement of Evidence of Jim Gard'ner (18 June 2025).

10.33 The Planning Report considers the assessment under the LVIA prepared by SLR (Appendix J and Annexure D to the Project Documentation) and references the additional viewpoints (where relevant) (Planning Report op cit. p130). My assessment, whilst informed by the Planning Report takes into account the more recent analysis and evaluation by Mr Goss/Orbit Solutions (op.cit).

10.34 KOP 01 – Queens Domain/Tasman Bridge



Figure 26: Stadium viewed from Tasman Highway at the western end of the Tasman Bridge) (source: VAE KOP 01)

The domed roof appears prominent from this viewpoint. Interestingly, the upper translucent portion of the roof allows some mitigation through background imaging of the Mount Nelson foothills and residential development thereon, whilst the lower 'eaves' portion of the roof presents as a solid horizontal line reducing in visibility behind the rising headland. The overall impression is that the Stadium is part of the industrial/port area, although it appears in a much broader viewfield that includes the River, port infrastructure (and berthed ships), Huon Keys,

against a dominant topographical background. Substantial tree plantings around the Cenotaph and along the foreshore adjacent to the railway line provide some further competing elements and mitigating factors. As indicated in the LVIA, the prominence of the roof will change during the day according to prevailing light and weather condition. The pale shading of the proposed roof materials will assist the perception of a lighter structure than if it were a solid opaque structure.

10.35 KOP 02 – Bridge of Remembrance



Figure 27: Bridge of Remembrance (source VAE KOP 02)

This viewpoint provides an elevated view of the Cenotaph and the Cove and River beyond. Notwithstanding the elevation, the domed roof of the Stadium dominates the Cenotaph and obscures views downriver and Blinking Billy Point (foothill of Mt Nelson). The immediate cultural context of the Cenotaph overlooking the harbour area of the River Derwent and Sullivans Cove is therefore impacted.

The Planning Report also notes broader impacts but asserts that views and interpretation of these features will not be entirely lost owing to the transparency of the Stadium roof form, and that:

...it's central position within the Site ensures that views and interpretation of the Cenotaph and the River Derwent/eastern shore directly behind the Cenotaph is retained. The slope of the roof form up and away from the Cenotaph also mitigates impacts on the trees/vegetation that frame the Soldier's Memorial Walk (ibid. p132).

I do not entirely agree with this assessment. As stated earlier, the setting and context of the Cenotaph will be compromised in terms of the relatively unencumbered views to and from the River and Sullivans Cove and from the Bridge of Remembrance and Soldiers Walk.

I do accept the Planning Report's assessment that the Stadium roof will provide a new contributory element and that the fundamental cultural significance will still remain. Also, that strategic plantings would mitigate the prominence of the Stadium roof, although this would not necessarily be possible from other viewpoints.

As indicated earlier, any negative perceptions about the visual prominence of the building must be balanced against the desired role and functionality of the proposal in the chosen location.

10.36 KOP 03 – Cenotaph to the Cove



Figure 28: KOP 03 3 (source VAE)

It is important to recognise that whilst this viewpoint currently allows views down the River, it does not provide a view of the River mouth. Any significance attached to viewing the River mouth can only be inferred. An actual view of the River mouth will therefore not be affected by the proposal.

Whilst broader views of the city and eastern shore will be available after development, the impact on proximate context is still significant.

This view is also occasionally impacted by cruise ships berthed at Macquarie Wharf, however these are ephemeral, irregular and at a greater distance, allowing interceding depth to mitigate their impact.

In my opinion, in this view the major element of impact is the Stadium roof. My previous comments, particularly in respect of KOP 02 equally apply to this viewpoint, and any negative perceptions about the visual prominence of the building must be balanced against the desired role and functionality of the proposal in the chosen location.

10.37 KOP 04 – Rosny Hill Lookout



Figure 29: KOP 04 (source VAE)

The Planning Report considers that:

The horizontal scale of the Stadium is much greater than its vertical scale and whilst the development does represent a perceptible change, the extent of change is limited to a relatively small area in the context of the cityscape and broader landscape setting (ibid. p131).

In my opinion the materiality of the proposed Stadium building allows a clear distinction to be made with the adjoining topography. The Planning Report further considers that the proposed material detail and articulation will further break down the perception of bulk and scale of the building.

I concur with this assessment.



Figure 30: KOP 05 (source VAE)

This view is similar to the MONA Ferry view provided in the SLR assessment. It provides clear views of the subject site, albeit from a low height.

I do not agree with the Planning Report's assessment that the Stadium dome resembles the topography of the amphitheatre that surrounds the Cove. Instead, I point to several other considerations:

- The view includes a broad variety of use and development, bulk, heights and shapes. I particularly note the imposing presence of the cruise ship to the left of the photo, and the brightly coloured blue fishing boat. Where the blue boat is shown is to become the permanent berth for the Australian Antarctic supply ship Nuyina, which with its prominent bulk and red colouration will provide a significant eye-catching interposing element. When 2 cruise ships are berthed at Macquarie Wharf, the Stadium building will recede further into the background and will only be partially visible. Large cargo vessels also regularly use these berths, providing an industrial port visual amenity.
- This view is essentially an industrial one – of the 'back' of the city, where wharves, sheds, warehouses, containers and the like provide evidence of a working port. The Stadium, whilst large in scale, bulk and height fits relatively comfortably within this industrial context;
- This view emphasises the prominence of the Stadium through its centrality in the image. In reality there is a much wider vista, and the Stadium is but 1 element in that vista;
- Built structural forms (including shipping) are a narrow central band relative to the mountain and the river. The Mountain and foothills remain the dominant features, and the Stadium does not diminish their legibility.
- The addition of texture, shade and colour reflecting a more resolved materiality has the potential to break up the visual plane of the building and thus its perceived impact.

My conclusion is therefore the same as the Planning Report's but for differing reasons (above).

10.39 KOP 06 – Evans Street



Figure 31: KOP 06 (source VAE)

The Planning Report (p.119) demonstrates that whilst the overall height of the Stadium is greater than the buildings in Evans Street, the domed roof reduces at the street-edge to a height “broadly reflective” of the taller existing buildings (Zero Davey and IXL Apartments). It is acknowledged that the overall scale of the Stadium is greater due to the functional requirements of the Stadium, but the reduced height and proposed articulated façade create a reduced scale when viewed at pedestrian level.

10.40 KOP 07 – Mount Nelson Lookout



Figure 32: KOP 07 (source VAE)

This is a distant view partly compromised by intervening vegetation. Indeed, the main overall features are the bands of:

- Foreground vegetation,
- River water plane,
- urban development (Battery Point and the city),
- central vegetation (the Domain),
- River water plane,
- industrial development (Zinc Works and Selfs Point oil tanks),
- distant vegetated hills,
- sky.

The urban development band is the most densely developed of these, and contrasts with all of the other bands. The Stadium sits easily within the variety of shapes and forms that populate this central band. It is not an uncomfortable or jarring element. In fact, it is only partially visible, and of less prominence than the cruise ship berthed at Macquarie Wharf.

In my opinion, from this viewpoint the Stadium simply forms part of the varied overall fabric of the city.

10.41 KOP 08 – Battery Point Headland



Figure 33: KOP 08 (source VAE)

This a view North down Runnymede Street across the Cove. The view is dominated by Apartments in the foreground which mask any view of the water. The rooflines of Zero Davey and the IXL Apartments are just visible to an experienced or informed eye, but the interceding IMAC building chimney flues distract from this finer detail. Otherwise, the Grand Chancellor building is prominent on the left, mainly owing to a combination of height, rhythm of fenestration, and brick colour. The adjoining Federation Concert Hall is visible but more recessive owing to its colouration. The Tasman Bridge is just visible in the distance, and a cruise ship is another dominating feature. Amongst this clutter of competing shapes, textures and colours, the Stadium roof appears as a relatively soft and less prominent element than others. In my opinion it is a background element that has little impact on the traditional character of the Cove.

10.42 KOP 09 – Parliament Gardens



Figure 34: KOP 09 (source VAE)

This is a northerly view across the Cove containing a variety of buildings of differing scale, heights, finishes and textures. The concept of the built wall is challenged by the 2 taller buildings, but can still be interpreted. Notwithstanding that, those buildings and the Elizabeth Pier building are the dominant features in this view.

The Stadium roof is visible, but appears softer and recessive in comparison to the other buildings. It is clearly a 'background structure' and neither in the foreground nor prominent.

In my opinion it is a background element that has little impact on the traditional character of the Cove.

10.43 KOP 10 - Waterside Pavillion Constitution Dock



Figure 35: KOP 10 (source VAE)

In this view looking Northeast across the Cove Floor the dominant features are the flat plane of the 'Floor', the Grand Chancellor building on the left, the Cruise ship on the right and the interceding (from left to right) Federation Concert Hall (Gasworks chimney at rear), Cenotaph, Zero Davey, a small part of the IXL buildings (IXL Apartments at the rear), the Mures Fish Centre in the centre, and the Mac 1 Hotel (Port Tower at rear). The central band is populated by take-away food barges and a boat under restoration, within the water plane of Constitution Dock.

The Stadium roof is visible, but appears as a soft and recessive element behind the hard clutter elsewhere on view. It is clearly a 'background structure' and neither in the foreground nor prominent.

In my opinion it is a background element that has little impact on the traditional character of the Cove.

10.44 KOP 11 - Victoria Dock Bridge



Figure 36: KOP 11 (source VAE)

This Northeasterly view shows the flat plane of the 'Cove Floor' and the built 'Cove Wall' of the Hunter Street buildings. The latter represent the 'traditional image' of the Cove, which along with Salamanca Place is commonly perceived as the 'traditional character'. The space behind these buildings is not readily perceived and does not contribute to that character.

The domed roof of the Stadium peaks over the roof-tops and with its different shape and materiality is clearly an element in the background, behind the built wall. It does not confuse or sully the imagery of the 'traditional character' in this view. Moreover, the scale of the Stadium is not perceptible from this viewpoint.

10.45 KOP12 – Mount Stuart Lookout



Figure 37: KOP 12 (source VAE)

This elevated view looking East-Southeast focuses on the Stadium in the middle distance, with the River plane and eastern shore urban development, vegetated hills and sky receding in the background.

In a wholistic sense the Stadium forms part of the built form of the city, but it is clearly a shape that is unique at its scale. The bulk of the Stadium walls are not readily apparent behind other existing structures and landscape, but the domed roof is prominent in this image.

Notwithstanding that apparent prominence, the upper translucent portion of the roof allows some mitigation through background imaging of the River. The overall impression is that the Stadium is part of the industrial/port area, although it appears in a much broader viewfield that includes the River, port infrastructure (and berthed ships), against a dominant topographical background. The prominence of the roof will change during the day according to prevailing light and weather condition. The pale shading of the proposed roof materials will assist the perception of a lighter structure than if it were a solid opaque structure.

Importantly the Stadium does not appear as part of the Cove area from this viewpoint as the built wall is not readily perceptible. At the same time, the Stadium appears to sit apart and below the Domain headland and the Cenotaph.

If the Stadium is accepted as another element in the evolution of the Cove and the city, whilst not impinging on the traditional character of the Cove within the built wall, the visual impact is acceptable from this viewpoint.

10.46 KOP 13 - Railway Roundabout Brooker Avenue



Figure 38: KOP 13 (source VAE)

This is not a readily accessible or commonly availed viewpoint. Notwithstanding that it demonstrates the presence of the Stadium when approximately approaching the Brooker Avenue/Macquarie Street/Davey Street intersection, which is heavily utilised by general vehicular traffic. However, only a partial view is available, as is the case continuing right up to the intersection.

The domed roof is partly visible in the background behind other buildings and street trees. It is not considered to be a significant element in this view as it is located where industrial buildings were formerly present, and does not remove any important viewlines.

The colour shadings, light roof structure, the dome shape and substantial tree screening all significantly mitigate impacts from this viewpoint.

10.47 KOP 14 – Collins Street/Brooker Avenue



Figure 39: KOP 14 (source VAE)

Similarly to KOP 13, this view demonstrates the role of intervening buildings and street trees in mitigating views of the Stadium. An additional feature is the Royal Engineers Building which will remain prominent on account of its contrasting colour and form against the mass of the Stadium façade.

Appropriate additional plantings will assist in visually separating the 2 buildings, whilst further mitigating the bulk of the Stadium.

10.48 KOP 15 - Macquarie Street/Evans Street



Figure 40: KOP 15 (source VAE)

The Gasworks buildings will continue, not only their dominant visual presence in this view, but also their contributory character. The Stadium building is only partly visible, with the walls appearing to ‘complete’ a hard northern street edge of Evans Street (which is currently largely vacant and open). The Stadium roof is also only partly visible between the GasWorks roof - lines, and appears to recede owing to its apparent soft shape and light structure.

Bearing in mind the industrial character of the GasWorks buildings and those that historically stood on the project Site, the Stadium does not denigrate the character and amenity of this part of the Cove when viewed from this location.

10.49 KOP 16 – Tasman Highway/Brooker Avenue



Figure 41: KOP 16 (source VAE)

This is a similar, but closer view than KOP 14.

The Stadium is more prominent than in KOP 14 but is still mitigated visually by the GasWorks buildings, street trees, and the Royal Engineers Building. In addition, textural detail and the contrasts between the Stadium walls and roof structure assist in breaking up the visual elements.

The Royal Engineers Building will remain prominent on account of its contrasting colour and form against the mass of the Stadium façade. Appropriate additional plantings will assist in visually separating the 2 buildings, whilst further mitigating the bulk of the Stadium overall.

It should also be restated that industrial buildings were formerly present in this view, and the Stadium does not remove any important viewlines.

10.50 Mitigation Measures

The proposed development represents a change to the visual environment around the subject Site.

The Planning Report (pp142-144) concludes:

- *The proposal does not result in the substantial visual loss or impact on key local built form elements that contribute to the 'Amphitheatre' or the Cove 'Wall' such as:*
 - i. *the historic and contemporary built form that around Sullivan's Cove; or*
 - ii. *the City Centre built form;*

- *The proposal does not significantly impact elements or areas of high visual, landscape, cultural or historic value such as the Cenotaph and surrounding Domain landscapes, the natural backdrop of the vegetated hills surrounding Hobart, the historic built form around the Cove and the City Centre as a result of its form which:*
 - i. *As a 'dome', has a maximum height at 1 point falling to the edges and which:*
 - A. *retain the visibility of important elements behind;*
 - B. *minimise the appearance of a large bulky form; and*
 - C. *transition to surrounding natural and built form elements.*
- *Whilst the Stadium presents as prominent feature within the locality, specific landscape, townscape and spatial values are retained within the context of the proposed development as:*
 - a) *The domed building form and its semitransparent materiality;*
 - i. *reduces the visual bulk and 'weight' of the built form;*
 - ii. *provide a contrasting form that complements the natural landforms visible from and near the subject site;*
 - iii. *complements the form and scale of the surrounding built form of the Cove by the creation of differentiating form;*
- *Whilst the Specific views in and out of the subject site are, to varying degrees impacted by the form, scale and bulk of the proposed development:*
 - *Views from Davey Street to the Cenotaph will be retained and views from the stadium back down Davey Street will be enhanced from its current condition.*
 - *The natural enclosure created by the Cenotaph and Battery Point headlands and Macquarie Street ridge allows the domed form to:*
 - A. *create a comfortable visual interface with the edge of the Escarpment; and*
 - B. *is consistent with the form and appearance of the Cenotaph headland; and*
 - C. *does not visually impact the Battery Point headlands;*
- *Whilst the overall significance of visual effects is typically high, this could reasonably be anticipated with a large built form of this nature on a site that is visible and in close proximity to area with high value.*

10.51 The Planning Report concludes that:

Whilst responding to the functional requirements of such use, the overall design of the Stadium has sought to alleviate the overall visual effects whilst also presenting a form that is able to contribute to, and achieve the overall urban renewal of the Site (ibid. p144).

I agree with the generality of the statement, but there is no avoiding the significant change that the proposal will bring in terms of contribution to the overall character of Sullivans Cove and the Hobart CBD. The *quid pro quo* is that the Site is available, underdeveloped, and

relatively hidden. It can be argued that the Site is not contributory to the 'traditional character of the Cove' as envisaged by the SCPR, planning scheme, Reset Masterplan and 2017 SDP.

- 10.52 In pragmatic terms, whilst it may be considered (as generally argued) to be part of the Cove Floor, it is practically outside the Cove if the 'traditional character' is to be considered relevant: the Site does not have a recognisable 'traditional character' other than as a railway yard (if assessed on the basis of predominant use and development). An industrial crane of post-WWII German origin once graced Macquarie Wharf. It was one of the tallest structures in the Hobart metropolitan area, but evinced no objections during its operational life, and was removed with little ceremony or regard for its heritage significance or contribution to the character of Sullivans Cove. In other words, the 'traditional industrial character' of Macquarie Point has been eroded since the demise of the railways. Is its only future considered to be a gentrified mix of low-rise residential and commercial development as promoted by the (current) 2017 SDP?

For arguments sake it might be postulated what character and building typology could have eventuated if the former railway site continued as a viable operation, or alternatively the Site became a shipping container transfer and storage depot to support upgraded port operations.

Accordingly, the dynamic nature of the Site in terms of alternative use needs to be given some weight and flexibility when considering the future use and development of the Site. The Stadium represents a new vision, use and development. Its scale and bulk are appropriate for the Site if allowance is given for the industrial context of the Site, or an alternative that is not simply mixed residential/commercial.

10.53 **Individual Prominence**

The Planning Report argues that although the proposed Stadium building will be 'individually prominent', that is a result of its functionality and purpose (ibid. p145).

In my opinion, the fact that it is a PoSS clearly characterises the building as individually prominent. Whilst the built form may not be regarded by some as 'iconic', the purpose, functionality and design requires it to be 'prominent': its built form, design, function and materiality, whilst having regard to character elements within the Cove, will necessarily be different to perceptions of 'traditional character' that might prevail in other parts of the Cove. That is consistent with the evolution of the Cove and the dynamic nature of the use and development of the Site.

10.54 **Urban Renewal**

The Planning Report provides a comprehensive consideration of the extent to which the Project supports the urban renewal of Macquarie Point, in accordance with the Mac Point Precinct Plan, having regard to:

- Complementing and not competing with neighbouring sites;
- Creating connections;
- Celebrating and preserving heritage;
- Reintegrate and address the Hobart waterfront;
- Prioritising the delivery of key use zones;
- Enabling the success of each zone;
- Driving sustainable outcomes;

- Being an expression of the Tasmanian Brand;
- Connecting to Place and Key Landmarks.

These are graphically summarised with direct reference to the Mac Point Precinct plan in Figure 34 of the Planning Report, shown below:

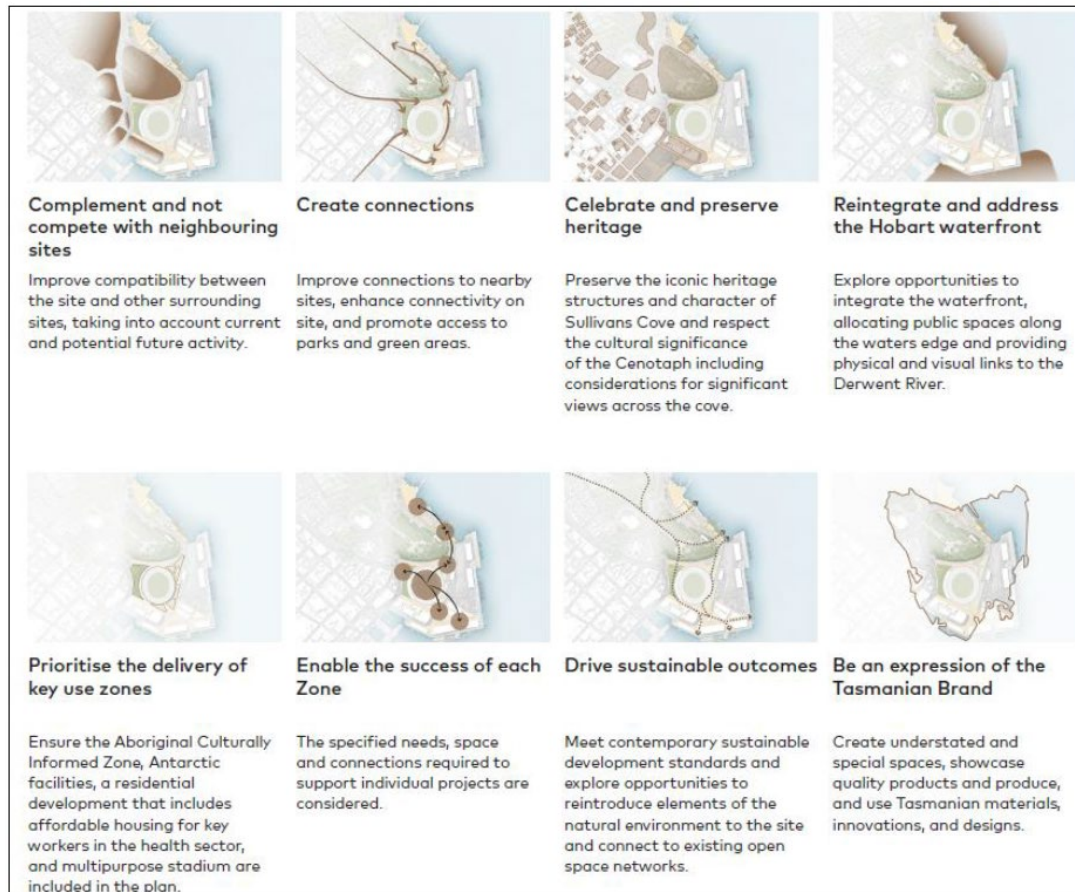


Figure 34: Mac Point Precinct Plan

I concur with the Planning Report's assessment of consistency with the Mac Point Precinct Plan with relevance to the issue of urban renewal.

11. POTENTIAL FOR LAND USE CONFLICT

- 11.1 I have reviewed the Planning Report's consideration of the potential for land use conflict arising from the proposal. It is comprehensive and detailed, deferring where required to other expert reports. I generally concur with the assessments provided and make only the following comments for clarification or disagreement.
- 11.2 The assessment considers the Stadium over 3 phases: construction, daily or regular functioning (including small to 'regular events'), and major events (with patron numbers greater than 20,000). Potential impacts are addressed in respect of noise, vibration, traffic, parking and event management, and overshadowing.
- 11.3 I am not appropriately qualified to comment on matters of noise, vibration, traffic, parking and event management, but have commented earlier in this report on the potential for overshadowing, noting that it is a feature that is impossible to avoid on the southern side of a building (ie the Evans Street frontage). Chapters 2 and 9 of the PoSS Summary Report provide an analysis of overshadowing impacts for the worst-case scenario (June 21st). The summary provided in the Planning Report (pp159-160) is consistent with my assessment and I repeat it below for the sake of completeness:

Due to the path of the sun and the siting, orientation and design of the Multipurpose Stadium, there will be limited shadowing of the nearest sensitive receptors (Zero Davey apartments, Sullivans Cove apartments and IXL Henry Jones Hotel) along Evans Street/Hunter Street during the morning period, beginning at 9am.

By approximately 10.30am, the extent of shadowing to these properties will have significantly reduced with little or no shadowing from 12pm onwards. The UTAS School will continue to receive sunlight throughout the morning and afternoon period. This is due primarily to the transparent stadium roof design, which allows the transmission of sunlight.

Due to siting and design, the stadium will not overshadow identified sensitive receptors to the north or west, including the Cenotaph, Regatta Grounds and future Residential Precinct (ibid).

The relevant shadow diagrams from the Architectural Plans (COX Architects) are provided on page 160 of the Planning Report.

- 11.4 In summary the Planning Report provides assessments of potential impacts and conflict in respect of:
- The Working Port & Cruise Terminal
 - Hunter Street Businesses, Hotels, Apartments & Utas School of Creative Arts
 - Queens Domain
 - Taswater Operations (noting that the WWTP is to be decommissioned and relocated at Self's Point)
 - The Cenotaph, Regatta Grounds & Domain Slipyards
 - Federation Concert Hall
 - Royal Hobart Hospital
 - ABC Broadcast Centre
 - Bahai Centre For Learning

- Residential Apartments & Old Woolstore Apartments
- Future Residential Precinct.

11.5 Mitigation measures for potential impacts

Whilst these matters are summarised in the Planning Report (pp183-185), they are addressed in more detail in the PoSS Summary Report and supporting consultants reports, as follows:

- PoSS Summary Report
 - Chapter 4 – Movement
 - Appendix Q (Noise and Vibration Assessment)
 - Appendix N (Transport Study)
 - Appendix AA (Construction Management Plan)

I defer to those expert assessments.

11.6 Development potential of adjoining sites

TPC Guideline 7.0.3 requires consideration of the future use/development potential of sites in the locality, to determine potential conflicts with the PoSS, as follows:

- *How the maximum level of proposed use of the stadium and the development of the stadium may affect current and potential future uses of sites and places in the locality;*
- *The potential for current or future use of sites and places to restrict the capacity of the stadium to host major events; and*
- *Allowable use of sites in the locality under applicable planning schemes.*

11.7 The Planning Report identifies the closest sites as being:

- UTAS Centre for the Arts
- Henry Jones IXL building(s); and
- Former Gasworks

and notes that these sites are already in use and have limited scope for intensification or redevelopment largely because of their heritage listings.

11.8 The ABC Broadcast Centre has large areas of vacant land, and the Mac Point Precinct Plan includes two sites at Regatta Point and the Domain slipyards/Huon Quays.

11.9 These sites have remained 'dormant' and underutilised for over a decade and various imagined futures have never eventuated. It is therefore not possible to forecast what might occur. If potential developments arise then the provisions of the current planning scheme, HIPS, or foreshadowed TPS-Hobart, will provide the necessary strategic direction and planning controls.

11.10 The potential does exist for development of the future residential precinct identified in the Mac Point Precinct Plan. The Stadium development is considered to be a realistic catalyst for this element by virtue of enhanced public access and connections around the Project Site and to Regatta Point. The potential for the Stadium to impact upon the future residential precinct has been considered in the following reports/plans prepared as part of the PoSS:

- Appendix Q (Noise and Vibration Assessment)
- Appendix N (Transport Study); and
- Appendix AA (Construction Management Plan)

12. ENVIRONMENTAL QUALITY & HAZARDS

- 12.1 I am not qualified to comment on environmental quality and hazards and defer to other appropriate experts in this regard.
- 12.2 I note that the Planning Report provides further consideration of overshadowing under this heading (PP190-192), and I concur with that assessment.

13. SIGNAGE STRATEGY AND ASSESSMENT

- 13.1 The Planning Report addresses the Signage Strategy comprehensively and in detail (pp193-206). Appendix Z of the project documentation also addresses 'Signs and Wayfinding Strategy'.
- 13.2 I concur with that assessment, with the additional comments:
- The scale and typology of the building, function, and urban context of a round stadium in a large plaza setting is not one anticipated or envisaged by the planning scheme. The practical utility of the signage and its function is therefore something that needs to be taken into account under the relevant considerations of Schedule 4 of the SCPS. In my opinion, Appendix Z and the Planning Report provide the appropriately balanced assessment that is required.
 - The detail of signage should not affect consideration of the overall use and development. Signage is an element that can be adjusted, refined or re-thought, and managed. Any concerns about the proposed signage can be addressed by appropriate Permit conditions.

14. SUMMARY/CONCLUSION

- 14.1 The proposed development has been declared a Project of State Significance (PoSS) under the *State Policies and Projects Act 1993*. It is required to be assessed against a specific set of criteria established by the Tasmanian Planning Commission, as part of the PoSS Integrated Assessment Process.
- 14.2 A declared PoSS is not subject to the standard controls and assessment processes under the *Land Use Planning & Approvals Act 1993* including the provisions under the *Sullivans Cove Planning Scheme 1997* (SCPS). Notwithstanding this, the planning scheme recognises the unique location and development potential of Macquarie Point, designating it a 'Key Site' suitable for urban renewal.
- 14.3 The PoSS provides Integrated Assessment Guidelines which draw upon the provisions and general considerations afforded under the SCPS and other relevant applied or incorporated documents.

- 14.4 This report provides a planning-based assessment of the Multipurpose Stadium, drawing upon the expert consultant input accompanying the PoSS submission, and particularly the Planning Report prepared by Ireneinc which responds to the relevant criteria in the TPC Integrated Assessment Guidelines. Areas of agreement, disagreement and clarification are identified.
- 14.5 I have drawn heavily on the analyses provided by the various heritage and archaeological reports, as well as the 2024 SDP to assess the character of the Project Site and form conclusions regarding the appropriateness of the proposal.
- 14.6 The analysis of the historic, spatial, and built form of Sullivans Cove provided in the 2024 SDP has guided the design of the Multipurpose Stadium and will form the basis of a planning scheme amendment to embed the new Mac Point Precinct Plan into *the Tasmanian Planning Scheme* and associated *Hobart Local Provisions Schedules*.
- 14.7 The development does represent a visual change to the Site and its context, primarily due to its scale and height compared to surrounding structures. The key element in this respect is the domed roof.
- 14.8 While the Stadium will be visually prominent, the design approach ensures the building maintains a respectful relationship to its surroundings while differentiating itself from the Cove Wall and aligning within the larger-scale typology of the Cove Floor.
- 14.9 The range of uses and events proposed will promote pedestrian movement and activation across the Site, contributing to the ongoing urban renewal of Macquarie Point. The ongoing day-to-day use of the Stadium and associated increases in pedestrian and vehicle movements has been carefully considered within the context of surrounding land use. Comprehensive Transport, Visual Impact and Noise & Vibration Assessments have been prepared to identify potential impacts that may arise and have outlined a range of management and mitigation measures to ensure the potential for impacts are managed appropriately.
- 14.10 The proposal has been considered against the relevant strategic policies, plans and strategies and broadly aligns with the purpose and intent of the *Tasmanian Resource Management and Planning System*.
- 14.11 The project documentation including the Planning Report augmented by this Statement of Evidence, provide a detailed assessment of the proposal, demonstrating consistency with the guiding principles of the *Sullivans Cove Planning Scheme 1997* (underpinned by the Sullivans Cove Planning Review 1991) and the TPC Integrated Assessment Guidelines.

15. RESPONSE TO DRAFT INTEGRATED ASSESSMENT FINDINGS

15.1 3.0 Urban form planning

Overall Comment: the “Strategic planning principles” referred to (p48 – Context) are symptomatic of the overall planning approach to Sullivans Cove (through the SCPR 1991 and the SCPS 1997) which prioritise ‘urban design’ over the spatial and economic efficiency aspects of ‘land use planning’. This is not a criticism, but simply an observation. When considering the Panel’s findings under the ‘Urban form’ heading it needs to be appreciated that the ‘strategic planning principles’ only reflect the perceived spatial typology and arrangement of buildings within the (assessed) landscape, ie ‘how it looks and how it is perceived’. The more fundamental and traditional aspects of land use planning, ie ‘how it works and whether it is compatible with surrounding use and development’ are addressed under section 6.0 of the planning scheme - Use and activity. However, there is no overt discussion of ‘strategic planning principles’ relating to land use, spatial and economic development in section 6.0. It is at best implied.

- 15.2 I agree with the Panel’s comment (p45) that “...overall, it is unlikely that any stadium development within Sullivans Cove could comply with the established planning principles for the area, regardless of design details. The size of the stadium is disproportionate to Hobart’s small scale ...and would be contrary to visual values which consist of natural topography, established built form, and urban detail and expression...” that are expressed and form the basis for the SCPR 1991 and SCPS 1997.

I also note comments attributed to HCC staff on p48, that “...the form of the stadium would be considered as an anomaly within the urban form of the city and some strategic planning work may need to be revisited if the stadium were to be built at Macquarie Point”. This comment confirms the prioritization of urban form as the key determinant, rather than spatial, economic or consideration of land use conflict.

- 15.3 It is perhaps necessary therefore to consider whether the PoSS status of the project overcomes the urban design considerations of the SCPS. On the one hand the PoSS process overrides the SCPS considerations, but on the other hand the TPC Guidelines for Integrated Assessment re-impose those considerations.

15.4 Comment on detail:

3.1 Urban form of Sullivans Cove and Hobart city

The amphitheatre and the Cove Wall: little consideration is given in the Panel’s assessment to the anomalous nature of the area between the Hunter Street buildings and the Cenotaph.

The key spatial elements of floor, wall, and radiating streets are readily identified in plan form within the SCPR but the principles have not been fully applied to the north of the Cove area.

Risby’s 2024 SDP notes that:

- Evans Street is not identified as a radiating street
- The Cove floor has not been shown as extending into the Macquarie Wharves area despite obviously being reclaimed flat port operations land
- The railyards are identified as ‘lost space’ – implying they require infill to complete an urban form.

- 15.5 This is an area where the 'wall' is expressed in 2 forms: the natural wall below the Cenotaph, and the artificial wall that is provided by the row of Hunter/Evans Street buildings. The area between these 'walls' has been subject to a number of uses and developments over many years including a range of sizes, heights and typology of buildings. Risby alludes to this in his 2024 Site Development Plan.
- 15.6 Both 'walls' have been less or more significant over the years since European settlement. Currently the artificial Hunter Street wall is partly obscured by the Mac 1 redevelopment and is therefore more inferred than realized when viewed from anywhere other than in Hunter Street itself. The natural escarpment wall is only potentially visible in its entirety from Evans Street, and partly visible from various points on the Derwent River or the higher elevations on the southern side of Sullivans Cove. Because of the site clearing that has been ongoing over recent years, the natural wall is possibly more visible currently than at any time since the late nineteenth century.
- 15.7 Whilst it is accepted that the area between Evans Street and the Cenotaph forms a continuation of the Cove floor, that area has been more densely developed historically than the wharf 'apron' areas seaward of the Hunter Street and Salamanca Cove warehouses. As indicated in the 2017 Site Development Plan that forms part of the current SCPS 1997 provisions, there is scope for more dense and relatively large-scale redevelopment of Macquarie Point including the project site.
- 15.8 The site of the proposed stadium has for over a century been an industrial site, and pragmatic use and economic considerations have hitherto determined the size, scale and location of buildings. Historically, the planning of Macquarie Point has been fluid and dynamic – responding to the (mostly) industrial and commercial circumstances of the day. The SCPS initially changed this by imposing relatively severe constraints on the potential built form of the Macquarie Point area, but it is noted that some flexibility has been exercised in the case of Zero Davey Street, the IXL Apartments and the Federation Concert Hall, in terms of height and bulk. The 2017 Site Development Plan codifies further flexibility, and Risby in the 2024 Site Development Plan suggests that there is scope on Macquarie Point for large scale developments given the area available and the space between Evans Street and the Cenotaph escarpment. In other words, there has been a progressive 'loosening' of controls regarding scale, bulk, and height since the introduction of the SCPS.
- 15.9 **Scale:** The proposed stadium would be unique in terms of scale, not only in Sullivans Cove, but the Hobart CBD. Notwithstanding that, the overall form of the proposed single structure is necessary to fulfill its function. It cannot be modified to meet the intent for smaller scale individual structures envisaged by the current SCPS.
- 15.10 The site of the stadium on the Cove floor between the artificial and natural walls is large enough to support the footprint of the stadium, and - placing aside consideration of the proposed roof structure – would be capable of minimal impact on the established built form and detail of the area of the Cove south from Hunter Street.

- 15.11 A broader consideration of the potential inconsistency with the principles espoused by the SCPR and SCPS promoting smaller scale individual structures in Sullivans Cove overall, would need to be set aside by virtue of the status of the proposal as a PoSS. The 2024 Precinct Plan and the draft 2024 Site Development Plan provide for the footprint of the stadium, and those instruments would need to form the basis of an appropriate amendment to either the SCPS or the Hobart LPS depending upon timing of introduction of the latter.
- 15.12 **Height:** From within Sullivans Cove, and from the Cenotaph, it is the height of the proposed stadium above the soffit (ie the eaves of the roof) that creates the most visual impact. Below roof level, the building either disappears from view or provides a minor addition to the overall roofscape. Similarly, on the occasion of cruise ships berthing at Macquarie Wharf, the stadium will either be screened by the ship(s) or the ship will become a dominant backdrop to all other structures, including the stadium.
- 15.13 When Macquarie Wharf is vacant of cruise ships, the roof of the stadium will rise behind the Hunter Street buildings when viewed from Franklin Wharf, and will dominate the Cenotaph from several viewing points through its far greater scale and mass.
- 15.14 Notwithstanding this, there are many viewpoints where views of the Cenotaph will not be impacted and will retain the sense of isolation and gravitas that it currently enjoys.
- 15.15 By far the most impacted view will be from the area immediately around the Cenotaph toward the mouth of the Derwent River. The view downstream of the River including Betsey Island will be lost, and the roof of the stadium will be the dominant feature, reducing the sense of isolation of the Cenotaph.
- 15.16 That the proposed roof form will break the outline of the promontory upon which the Cenotaph sits, when viewed from many locations, is at odds with the currently prevailing urban design philosophy adopted by HCC for protection and reflection of the landforms surrounding Hobart and Sullivans Cove in particular.
- 15.17 The elimination of the proposed domed roof, or a more articulated form with reduced height would have the potential to overcome these impacts. The 2024 SDP (pp65-66) provides a simple diagrammatic example of how the bulk and height of a larger building might be managed on the project site. It is not clear how this could be accommodated to meet the functional needs of the stadium. It is possible that such an approach might still be considered inconsistent with the principles of the SCPS, and may not be pragmatic from a structural or functional perspective. This is a matter that needs a balanced consideration having regard to the status of the proposal as a PoSS.
- 15.18 **Building alignment:** The Panel consider Evans Street is identified by the SCPR as a street that should have buildings with active frontages forming a street edge. I do not dispute this. However, the Panel misrepresent Evans St as a 'radiating street' and by doing so apply the same parameters for spatial development as for the radiating/grid pattern elsewhere in the Cove.

- 15.19 The SCPR prescribes that buildings on the Cove floor should be ‘freestanding’ and exhibit an ‘all round’ character that addresses the space around them in every direction. This is a form very different to that prescribed for buildings that make up city blocks and the ‘wall’ of the Cove most obviously found in Salamanca Place and Hunter Street.
- 15.20 Existing buildings contribute to just 11% of the street wall on the northern side of Evans Street. Notwithstanding that the stadium has a curved footprint reflecting functional needs, it will be built to the Evans Street property boundary for approximately 50% of the street’s length.
- 15.21 Reduced building height at the perimeter of the building, together with an articulated façade will reflect the scale of buildings on the southern side of Evans Street.
- 15.22 The Mac Point Precinct Plan also provides for additional future development and activity on the northern side of Evans Street, which will assist in creating a further sense of enclosure together with pedestrian interest and amenity.
- 15.23 ***History of form and use: materials, finishes and landscaping:*** the materials and finishes used historically have been generally, brick, stone, rendered masonry and tin, with excursions into formed concrete and asbestos for wharf buildings, and steel and glass for more recent new and re-purposed buildings.
- 15.24 The comment made by the Panel that cladding is typically not used is incorrect. Prominent buildings which incorporate cladding are: Mac 1, Mac 2, Zero Davey, the boutique hotel at 17A Castray Esplanade and the Federation Concert Hall. It may be the type or finish of the proposed timber cladding that is the real concern, and it is my opinion that this is a relatively minor detail that could be re-considered if required, but in reality is no different to Mac 1.
- 15.25 Similarly, concerns expressed regarding the lack of detail or resolution of landscaping are all capable of further exploration and refinement.
- 15.26 The Panel considers that the form of the stadium would not correspond with the surrounding urban forms and elements. The Panel notes that the surrounding buildings and urban elements are characterised by rectangular geometric forms and concludes that the stadium would present, by nature, an ambiguous form which does not reference, reflect or otherwise relate to the surrounding clear urban forms and elements. However, the Federation Concert Hall, Bahai Temple, Port Control Tower, Sewerage Treatment tanks, Salamanca Terraces (93 Salamanca Place), One Collins, the Railway Roundabout, and the Silos all present curved or circular elements, albeit not to the same scale as the proposed stadium.
- 15.27 In addition, the project site once contained the ‘Railway Roundhouse’, which was a prominent circular building which I understand is desired to be reflected in some way in the project design.
- 15.28 So, there are buildings that are not rectangular geometric forms across the entirety of Sullivans Cove. The curvilinear form of the proposed stadium is therefore not the key issue. It is more the scale. Notwithstanding this, the function of the stadium dictates the curvilinear

form and the scale. As such, this is a matter to consider in the context of the stadium's status as a PoSS.

15.29 **3.2 Landscape and visual effects**

Dominance of the city, Sullivans Cove and Macquarie Point: I do not dispute the Panel's conclusions in this respect, but repeat my point made earlier, that a significant contributor to the visual impact of the stadium is the height and monolithic form of the roof. The impact would potentially be reduced overall with a different more articulated form, but that may be prevented for functional reasons.

15.30 I therefore revert again to the status of the project as a PoSS. Not only does the PoSS set aside the statutory instruments, but the underlying reasons for declaring the PoSS must include the significance of the proposal, its potential to not align with current statutory instruments, and a policy context that prioritises the specific use and development.

15.31 In addition, it needs to be acknowledged that a potentially iconic development for a significant purpose, in a significant location will likely stand out and 'not fit the rules'. For example, the Federation Concert Hall may allude to the nearby former gasworks, but it does not strictly meet the provisions of the SCPS. The 2024 SDP refers to the pyramid extension at the Louvre Museum, the Boijmans Art Depot in Rotterdam. These are prominent buildings that celebrate their difference from their surroundings, as are the Guggenheim Museum in Bilbao, and the Sydney Opera House. None of these buildings would pass the bulk, scale or landform parameters that prevail in the SCPS. To place this in a sports stadium context, the newly re-built Bernabeu Stadium in Madrid is clad in steel, and sits 60m high in the middle of residential development. Sky Stadium in Wellington, New Zealand (known as 'the Cake Tin') is a steel unroofed multi-purpose stadium, 26m high, of similar capacity to the proposal, located in a similar dockland setting.

15.32 The Panel's conclusion that the proposed design is not iconic by virtue of not being "unique, groundbreaking or innovative" is subjective. Within a Tasmanian context the design and construction is certainly unique, innovative, and potentially groundbreaking. It may be that the domed roof contributes significantly to a potential 'iconic' status, or not – but it is certainly open to further discussion to determine the merits of the design.

15.33 The visual impacts on the Cenotaph, and the perception of the Domain Headland/promontory on which it sits are significant issues. The domed roof contributes greatly if not solely to this impact, however the fundamental cultural significance of the Cenotaph will remain regardless of this additional contributory element. As indicated above, in view of the PoSS status of the proposal some balance must be considered when determining the appropriate outcome.

15.34 **3.3 Project design**

The Panel's comments about scale and visual impact on the city as a whole, and Sullivans Cove in particular, are addressed above. Further Panel comments relate to design detail, connectivity, and the amenity of surrounding spaces – all of which I consider to be the realm of the designers.

15.35 **3.4 Signage**

Signage details are capable of being resolved over time in response to appropriate Permit conditions.

15.36 **6.0 Use and activity**

15.37 **6.1 Temporal use and activation**

Strategic planning principles: The strategic land use planning principles for Macquarie Point are not as strongly articulated as those for urban design. Essentially the SCPR, SCPS and the MPDC Act promote the redevelopment of Macquarie Point as a 'vibrant mixed-use precinct' whilst not compromising the operation and future of the 'working port'. Little consideration is given to avoiding land use conflict through strategic planning. Rather the consistent themes are mostly a default to urban design outcomes. The following outcomes from the SCPR noted by the Panel (p72) reflect this approach:

- *activities would complement the central city and not demand new buildings that are out of scale with the Cove*
- *a primary aim is to generate greater activity while not detracting from the essential character of the Cove*
- *mixed-use activities are essential for active cities. Town planning should encourage a mix of land uses to strengthen its role as a cultural and festive focus and encourage activities. This includes using public spaces during the day and at night and generally enhancing outdoor/street-based activity; and*
- *this should occur in a manner that maintains the function of the working port. Activities that warrant a building type that is out of scale with the Cove shall not be permitted.*

15.38 A range of use and activity is allowable under the SCPS and is further contemplated by the Mac Point Precinct Plan. The Panel do not consider the potential for land use conflict (eg between residential development and port operations) that already exists under the SCPS and could occur under the Mac Point Precinct Plan. Instead, they consider that these conflicts will arise because of the operation of the stadium (noise, traffic, congestion) and the diminished areas that will be available for a proper mix of use and development after the stadium's large footprint has absorbed most of the available area. They also consider that the impacts to existing uses during construction will be unreasonable. These are at best circular arguments that could be levelled at any individual development: there will always be cause and effect, and opportunity-cost. If a new residential development were to occur within the Mac Point precinct (absent the stadium proposal), then that would not only affect the scope for further use and development, but would also introduce amenity considerations, which may or may not in turn affect port operations. Construction causes inconveniences, but these are temporary, and do not colour the on-going operation of a new development. A properly conceived Construction Management Plan (CMP) should minimise impacts to other activities in the locality.

15.39 The comments made by the Panel that the spaces around the stadium are inadequate and would not be sufficiently activated during non-stadium events (pp73-74) presupposes that the area would only be activated by stadium use. The proximity of the cruise ship terminal (Mac 2), tourist and accommodation use in Hunter Street, and the success of small

cultural/commercial activities – such as the current use of the Red Shed – all point to the potential for activity during non-stadium use. New residential development in the vicinity would add further to this potential. In my opinion the Panel has defaulted to urban design consideration rather than strategic land use planning.

15.40 **6.2 Land use compatibility**

Port operations: the Panel consider that there would be a clash between the operation of the cruise ship terminal (when a cruise ship is berthed) and the stadium (when an event is occurring). It is asserted that this clash would manifest itself through road closures and difficulties in coaches (for example) gaining access to either facility. It is not clear whether the Panel has relied on any empirical data to support this finding, or whether consideration has been given to the following potential mitigations:

- improved wayfinding mechanisms around Sullivans Cove for visitors accessing cruise ships;
- provision of specific wayfinding mechanisms for patrons of stadium events;
- the proposed northern access road;
- the implementation of traffic and pedestrian management plans.

15.41 Construction causes inconveniences, but these are temporary, and do not colour the on-going operation of a new development. A properly conceived CMP should minimise impacts to other activities in the locality. Consultation with other stakeholders (eg AAD, Tasports, University, Mac 1, Tas Police) should provide for appropriate strategic operational management for any likely scenario.

15.42 **Tasmanian Symphony Orchestra (TSO) and Concert Hall:** Specialist expert advice is available to address the technical impacts and requirements in relation to the operation of the Federation Concert Hall and the ABC Broadcast Centre.

15.43 On a more prosaic level I am advised that activities both during construction and actual stadium events can be organized so as to not clash or impact with events at the Concert Hall.

15.44 **Upper Queens Domain:** The Panel considers that stadium events will place significant pressure on car parking, particularly for the Aquatic Centre and Tennis Centre.

15.45 It appears from the Panel's comments, that HCC is currently engaged in considering the use of Domain parking areas would be managed during events. It is therefore premature to conclude that there would be a negative impact or that affective management could not occur.

15.46 **Other use and activity in the surrounding area:** The Panel has assumed that Hunter and Evans Streets would be closed during stadium events, and that this would have a deleterious impact on the businesses, residents and other activities that rely on those accesses. Currently there is a variety of traffic management scenarios that are put in place for events such as marathons, cycling, the Sydney-Hobart, Wooden Boat Festival, Dark Mofo, Royal

Hobart Regatta, Salamanca Market and so forth. It is therefore not unusual for partial or total road closures to occur in Sullivans Cove, and for various management tools to be utilised. The number of stadium events proposed per year would conceivably be firmly programmed so that affected business, residents and other users would be aware of the necessary management scenarios well in advance.

15.47 In terms of construction noise the Panel notes that this will only be temporary, but still concludes that it will potentially be significant and deleterious. This is another area where a properly detailed and considered CMP could address the Panel's assertions.

15.48 In terms of noise from events at the stadium, this is best addressed by the appropriate experts, however I note that events do not usually occur during sleeping hours (11pm to 7am) and impacts on that most important aspect for local residents and visitor accommodation should be minimal.

15.49 **10.0 Ministerial Direction Matters**

15.50 **10.3 Consistency with the Mac Point Precinct Plan**

15.51 Several matters arise that are not addressed above. I comment on them below:

(e) & (f) Integration:

The Panel considers that the proposal is inward-looking and does not integrate with the wider Macquarie Point precinct, nor do the surrounding spaces appear attractive for mixed use or activation.

15.52 I have commented that the Panel's argument is a circular one: any individual proposal is at risk of not appearing to integrate, when there are no immediate corresponding developments. The question that arises is "integrate with what?". It is unlikely that any new development could integrate with the Port element of the precinct unless it is port-related, such as warehousing, or administrative operations such as the AAD, shipping providers, freight, or mechanical engineering. Residential development (allowable under the SCPS and the Precinct Plan) would automatically raise the potential for land use conflict, contrary to fundamental planning principles and the Schedule 1 Objectives under LUPAA.

15.53 It is possible therefore that the requirement for integration is unrealistic, other than in a simplistic built-form context. This highlights the problem with approaching land use and development planning on a primarily urban design basis. Given the potential that already exists for land use conflict and diminished amenity arising from port operations, many of the 'mixed use' options promoted by the 2017 SDP are therefore also potentially problematic. That is one of the reasons that it has taken so long to find a suitable use and development for Macquarie Point. The proposed stadium provides an option that would not create significant land use conflicts. It may be limited in its ability to integrate the immediate surroundings in a manner that creates a variety of mixed use and public spaces that are activated and attractive, but that may be unrealistic given the industrial character of the site and its 'working port' context.

15.54 ***(g) evacuation/spatial compromises:***

consistent with its approach above, the Panel finds that there would be insufficient space for the adequate achievement of emergency egress, emergency vehicle movement, general pedestrian movements, and safe and pleasant public spaces. The Panel considers development of other zones detailed in the Precinct Plan, particularly the 'Antarctic Facilities Zone' and the 'Complementary Integrated Mixed Use Zone', would compromise the functionality of the stadium.

15.55 There is no consideration by the Panel of the fundamental conflicts that arise regardless of the stadium, because of the potentially competing provisions of the SCPS and the Precinct Plan in respect of Macquarie Point. I respectfully suggest that the Panel should as part of its consideration, be also examining whether the provisions governing Macquarie Point are realistically able to be implemented without the risk of land use conflict and reduced public amenity. If this consideration were undertaken the use of the PoSS process would become more apposite to being capable of resolving a future for Macquarie Point that is not potentially confounded by competing outcomes.

15.56 ***(h) relocation of housing component:***

The Panel notes the lack of available space on the site around the stadium has resulted in the housing element of the Precinct Plan being displaced to Regatta Point, which is an isolated area of land that appears unsuited to residential amenity and has a high potential for land use conflicts with activities at the adjacent Macquarie Wharf. The inference is that this is a negative outcome.

15.57 The Panel does not consider the potential land use conflicts that may arise from the original location of housing in proximity to Macquarie Wharf, nor does it delve into a detailed assessment of the amenity of the alternatively proposed Regatta Point location.

15.58 The relocation is clearly a solution to the reduced space around the stadium. There are pros and cons to the relocation of the residential component which should be explored further before automatically assigning that aspect as a contra to the stadium.

15.59 ***(i) compromise of potential adjoining buildings:***

The Panel considers buildings within the Antarctic Facilities Zone and the Complementary Integrated Mixed Use Zone would not be able to be constructed owing to encroachment of the bus plaza.

15.60 The size of buildings or areas required by the AAD is unknown at this stage. Similarly, the actual development area and any building for 'mixed use' is yet to be determined. The Panel consider that there is insufficient area in these locations for buildings to be viable, but without the knowledge of those uses or development is entirely speculative. In both cases, there would be scope for design detail to be employed to allow access under or around the zones (eg arcades or undercroft areas) depending on the functional needs of the building owners.

15.61 ***(k) compromise of the Precinct Plan objectives:***

The Panel considers the Project would be incompatible with the achievement of the (other) objectives of the Precinct Plan. The Panel notes, that the additional space that would be gained by not developing other elements of the Precinct Plan would not be sufficient to resolve all issues with the stadium's operation.

- 15.62 As indicated above, the objectives of the Precinct Plan have the potential to be competing, if not conflicting. The stadium proposal has exposed these potential conflicts, which is a reason for utilising the PoSS process in order to vary those provisions to allow a broader consideration.

16. CONSIDERATION OF DRAFT PERMIT CONDITIONS

- 16.1 ***A4*** *The multipurpose stadium is approved to host sporting matches, concerts, functions, and social or community events. Events must not exceed 24,500 patrons, except for concert events which may accommodate up to 31,500 patrons.*

An increase in patron numbers above 31,500 may be permitted for specific events to a maximum of 40,000 patrons, subject to the prior approval of an Event Management Plan and Operational Transport Management Plan by the relevant regulator (as specified in Schedule 8).

Reason for condition

To define the approved event types and establish a framework for managing maximum patron capacities in a way that protects public safety, supports infrastructure planning, and allows for flexibility where justified by additional management measures.

- 16.2 Comment: the condition requires clarification as to why there is a differentiation between events.

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- MPDC, Macquarie Point Strategic Framework and Masterplan 2015-2030, July 2015
- MPDC, Tasmanian Aboriginal Community Engagement – Aboriginal Culturally Informed Zone and Stadium – CHMA – August 2024
- RISBY, B. A Site Development Plan for Mac Point, 9 April 2024 (Appendix GG of the Project documentation)
- SOUTHERN ARCHAEOLOGY, draft Aboriginal Heritage Assessment Report (AHAR), 30 January 2025
- *Southern Tasmania Regional Land Use Strategy 2010-2035*
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- STATE OF TASMANIA (Dept of State Growth), Keeping Hobart Moving - Transport Solutions for our Future (Draft), October 2023
- STATE OF TASMANIA (Dept of State Growth), Tasmanian Antarctic Gateway Strategy 2022–2027, November 2022
- *State Policies and Projects Act 1993*
- *State Policies and Projects (Project of State Significance) Order 2023 Statutory Rules 2023, No. 66*
- *State Policy on Water Quality Management 1997*
- *Sullivans Cove Planning Scheme 1997*
- *Sullivans Cove Planning Scheme 1997 Draft Amendment 2/2015*
- TASMANIAN GOVERNMENT, Hobart City Deal website, October 2023
- TASMANIAN HERITAGE COUNCIL, Implementing Tasmania's *Historic Cultural Heritage Act 1995*, February 2020
- TASMANIAN PLANNING COMMISSION, Draft Integrated Assessment Report Macquarie Point Multipurpose Stadium Project of State Significance, 31 March 2025
- TASMANIAN PLANNING COMMISSION, email to MPDC, 22 January 2025
- TASMANIAN PLANNING COMMISSION, Guidelines: Macquarie Point Multipurpose Stadium Project of State Significance, 16 February 2024
- TASMANIAN PLANNING COMMISSION Practice Note 14: Expert Evidence
- TASPORTS, Port Master Plan 2018, TasPorts website, April 2025
- TASPORTS, Macquarie Wharf Redevelopment, TasPorts website, April 2025
- TETRA TECH COFFEY, Environmental Auditor Opinion - Remediation Approach, 30 January 2025.
- *Urban Drainage Act 2013*
- WOOLLEY, L. Building Height Standards, June 2018

APPENDICES

APPENDIX A

INSTRUCTIONS

12 December 2024

Neil Shephard
Founding Director
Neil Shephard & Associates
neilsh@bigpond.com

BY EMAIL

Confidential and subject to legal professional privilege

Dear Neil

Letter of Instruction – Macquarie Point Multi-Purpose Stadium Project Of State Significance – Integrated Assessment Process Hearing

1. Introduction

- 1.1 We act for the Macquarie Point Development Corporation (**MPDC**) in relation to the proposed multi-purpose stadium in Hobart (**Project**). MPDC is a statutory authority responsible for the planning and delivery of the Project.
- 1.2 The Project has been declared a Project of State Significance (**POSS**) under the *State Policies and Projects Act 1993* (Tas) (**Act**) and is subject to an integrated assessment
- 1.3 In accordance with a Ministerial Direction dated 16 October 2023 and the Act, the Tasmanian Planning Commission (**TPC**) is undertaking an integrated assessment of the Project. To date, the POSS process has involved the TPC preparing, consulting on and issuing final the Macquarie Point Multipurpose Stadium Project of State Significance Guidelines dated 16 February 2024 (**Guidelines**). The Guidelines set out the material MPDC must submit to the TPC and the TPC's assessment of the Project. The Guidelines are enclosed at Item 1 of Appendix A – Index of Materials.
- 1.4 On 17 September 2024, MPDC submitted various reports in response to the Guidelines. The material submitted is enclosed at Items 4 – 44 of Appendix A – Index of Materials.
- 1.5 The TPC is now preparing a draft Integrated Assessment Report (**Draft IAR**) in consultation with Hobart City Council and other agencies with an interest in the Project. The Draft IAR will be put on public exhibition during which public representations may be submitted in respect of the Project and the Draft IAR. Following public exhibition, the TPC will hold a panel hearing to consider the representations received. Then the TPC prepares a final report recommending

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whether or not the Project should proceed and any conditions that should apply in the event the Project is approved.

1.6 We anticipate that:

- (a) the Draft IAR will be publicly exhibited at the start of 2025; and
- (b) a panel hearing will be held in April 2024 and span for approximately six weeks.

1.7 It is not yet known whether the hearing will be held in person in Hobart or online or a combination of both. We will keep you informed of any relevant dates and directions, including the timetable for filing evidence.

1.8 We are instructed to engage you for the provision of independent expert evidence in the area of town planning at the hearing.

2. Overview of the Project

2.1 Key elements of the Project comprise:

- (a) an all-weather, roofed multipurpose stadium with a seating capacity of 23,000 and standing room for 1,500 patrons for major sports events and a 31,500 patron capacity for major concert events;
- (b) an accessible external concourse and arrival plazas;
- (c) relocation and integration of the heritage Railway Goods Shed building within the stadium complex;
- (d) outdoor cricket wickets; and
- (e) a basement car park comprising approximately 536 car spaces.

2.2 The objectives of the Project are:¹

1. *establish a roofed minimum 23,000 seated Multipurpose Stadium in Hobart.*
2. *be a foundation development that supports the redevelopment and activation of Macquarie Point, as part of a mixed-use precinct.*
3. *be designed, developed and operated to reflect the character of the site and place.*
4. *contribute to the economy and infrastructure pipeline, and provide social and cultural benefits to the State.*

¹ Macquarie Point Multipurpose Stadium Summary Report dated September 2024, p 12.

5. *be a Tier 2 Multipurpose Stadium that meets the requirements of the Tasmanian Government and AFL's Club Funding Agreement.*
6. *support a range of sporting codes including cricket and rectangular sports.*
7. *add to the existing venues available for cultural, business, community and non-sporting events available, and attract visitors and new events to the State.*

2.3 A more detailed description of the Project can be found in the Macquarie Point Multipurpose Stadium Summary Report dated September 2024 submitted by MPDC to the TPC in accordance with the POSS process. The Summary Report is enclosed at Item 4 of Appendix A – Index of Materials.

3. Overview of the Integrated Assessment Process

- 3.1 We have set out an overview of the POSS process for the Project in the Introduction section of this letter.
- 3.2 A more detailed explanation of the POSS process can be found in the Guidelines, enclosed at Item 1 of Appendix A – Index of Materials. A flowchart setting out key steps in the POSS process is also enclosed at Item 2 of Appendix A – Index of Materials.

4. Instructions

- 4.1 You are instructed to:
- (a) review this letter and the documents to which it refers;
 - (b) prepare an independent expert witness report (to be filed on a date to be confirmed) which:
 - (i) sets out your background, experience and relevant expertise;
 - (ii) reviews the background materials, including the Guidelines, Macquarie Point Multipurpose Stadium Summary Report and Appendices filed as part of MPDC's submission to the TPC, the TPC's request for information and MPDC's response(s) as relevant to your area of expertise;
 - (iii) reviews other relevant documents, including the Sullivan's Cove Planning Scheme (1997);
 - (iv) considers the Draft IAR and any representations relevant to your area of expertise and responds to any relevant issues raised;
 - (v) considers the town planning impacts of the Project and forms an opinion as to whether it is worthy of approval having regard to the Act, the Guidelines and other relevant matters, including the applicable planning controls, policy framework and site context;
 - (vi) considers any other matters that you consider are relevant to your assessment of the Project;

- (vii) identifies all facts, matters, methodologies and assumptions upon which your town planning report is created;
- (viii) identifies any documents or other materials you have been instructed to consider or take into account in preparing your expert witness report, and the literature or other material used in preparing your expert witness report;
- (ix) contains a summary of your opinion or opinions;
- (x) includes a statement identifying:
 - (A) any opinions which are provisional and why they are provisional (i.e. why such opinions have not been or cannot be fully researched); and
 - (B) any matters falling outside of your expertise; and
- (xi) is in accordance with TPC Practice Note 14: Expert Evidence (enclosed at Item 45 of Appendix A – Index of Materials);
- (c) appear and give expert evidence at the Hearing (on a date to be confirmed);
- (d) review and respond to any additional documents provided to you in association with this matter;
- (e) attend meetings with MinterEllison and MPDC, as necessary; and
- (f) review and comment on other parties' expert evidence to the extent relevant to your area of expertise.

4.2 We may provide you with further instructions on the scope of your engagement from time to time.

5. Key Dates

5.1 We will confirm dates for filing materials and for the hearing in due course.

6. Engagement and fees

6.1 You are retained by us on behalf of MPDC, to assist us in providing legal advice to MPDC.

6.2 As such, all communications, whether verbal or written, should be directed to MinterEllison, so that we can coordinate, manage and integrate work activities with legal requirements and ensure that privilege is maintained as appropriate.

6.3 However, you are contractually engaged by MPDC. Accordingly, MPDC will be responsible for the payment of your fees in relation to the provision of your services, but any invoices should be sent to us.

7. Conflicts

- 7.1 You need to ensure that you are free from any possible conflict of interest in providing your advice.
- 7.2 You should ensure that you have no connection with any party, or potential party to this matter that could preclude you from providing your opinion in an objective and independent manner.
- 7.3 Please let us know as soon as possible if you consider that there may be a conflict.

8. Confidentiality and legal professional privilege

- 8.1 Your professional advice is sought in the context of us providing legal advice in relation to this matter and attracts legal professional privilege. Accordingly your advice attracts legal professional privilege by virtue of you being engaged by us. Our client is therefore not required to disclose any advice provided by you to any other party unless that privilege is waived.
- 8.2 To ensure legal professional privilege is maintained, please ensure that:
 - (a) you do not advise anyone, other than our client or MinterEllison, that you have been engaged to provide advice/expert evidence in relation to this matter;
 - (b) you contact us as soon as practicable if anyone other than MinterEllison contacts you about this engagement or the work you undertake under it; and .
 - (c) any documents you prepare should be marked "*Confidential and subject to legal professional privilege*".
- 8.3 Material supplied by MinterEllison or MPDC is, unless already in the public domain, confidential and not to be copied or used for any purpose unrelated to this matter without prior written permission from MinterEllison or MPDC.
- 8.4 Upon conclusion of your engagement, all material supplied by MinterEllison or MPDC, or created by or obtained you in relation to connection with your proposal or any work completed pursuant to your engagement, must be either deleted or provided to us at our discretion and to our satisfaction.

If you have any queries in relation to this letter of instruction or require further information, please do not hesitate to contact Aaron Wood, John Carey or Joshua Dellios.

Yours faithfully

MinterEllison

MinterEllison

Contact: Aaron Wood T: +61 3 8608 2356

aaron.wood@minterellison.com

John Carey T: +61 3 8608 2687

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Partner: Joshua Dellios T: +61 3 8608 2921

joshua.dellios@minterellison.com

OUR REF: 1473212

APPENDIX A. INDEX OF MATERIALS

Tab	Description
1.	Tasmanian Planning Commission – Guidelines: Macquarie Point Multipurpose Stadium Project of State Significance (16 February 2024)
2.	Tasmanian Planning Commission – Multipurpose Stadium Integrated Assessment Process Flowchart (22 February 2024)
3.	Tasmanian Planning Commission – Guidance on representations and hearings for the Macquarie Point Multipurpose Stadium (23 July 2024)
4.	Macquarie Point Multipurpose Stadium Summary Report
5.	Appendix A - Architectural Drawings
6.	Appendix B – Stadium Design Description
7.	Appendix C – Housing for Workforce
8.	Appendix D – Cut and Fill Report
9.	Appendix E – Cost Benefit Analysis
10.	Appendix F – Economic Impact Assessment
11.	Appendix G – Financial Impact Report
12.	Appendix H – Social & Cultural Analysis
13.	Appendix I – Urban Design Framework
14.	Appendix J – Visual Impact Assessment
15.	Appendix K – Previous Aboriginal Heritage Investigations
16.	Appendix L – Historical Cultural Heritage Impact Assessment
17.	Appendix M – Historical Archaeological Assessment Sensitivity Report
18.	Appendix N – Transport Study
19.	Appendix O – Wind Comfort Assessment
20.	Appendix P – Lighting Assessment
21.	Appendix Q – Noise and Vibration Assessment
22.	Appendix R – Natural Values Assessment
23.	Appendix S – Stormwater Management Plan
24.	Appendix T – Solid Waste and Hazardous Material Management
25.	Appendix U – Coastal Inundation Assessment
26.	Appendix V – Site Remediation Strategy Update
27.	Appendix W – Overland Flood Assessment
28.	Appendix X – Geotechnical Interpretive Report
29.	Appendix Y – Heat Risk and Climate Change Assessment
30.	Appendix Z - Signs
31.	Appendix AA – Construction Management Plan
32.	Appendix BB – Services Report Infrastructure Strategy
33.	Appendix CC – Emergency Management and Incident Response

34.	Appendix DD – Title Folio Plans and Easements relating to the Project Site
35.	Appendix EE – Car Parking and Access Review
36.	Appendix FF – Conceptual Hydrogeological Model and Numerical Model
37.	Appendix GG – Site Development Plan
38.	Appendix HH – Pre-Stadium Cultural and Landscape Values Assessment
39.	Appendix II – Geotechnical Factual Report
40.	Appendix JJ – Mac Point Precinct Plan
41.	Appendix KK – Preliminary Results of Acid Sulphate Testing
42.	Appendix LL – Site Environment Management Plan
43.	Appendix MM – AFL Licence Taskforce Business Plan (18 December 2019)
44.	Appendix NN – Public Art Strategy Discussion Paper
45.	Tasmanian Planning Commission – Practice Note 14: Expert Evidence
46.	Tasmanian Planning Commission – Request for Further Information (19 November 2024)

APPENDIX B
CURRICULUM VITAE



Planning and Development Consultants

RESUMÉ: NEIL SHEPHARD

Office Address: 29 Maning Avenue
Sandy Bay, Tasmania 7005

Postal Address: PO Box 273
Sandy Bay, Tasmania 7006

Telephone: 0417 25 0232

E-mail: neilsh@bigpond.com

Date of Birth: 3rd September 1959

Nationality: Australian

QUALIFICATIONS AND MEMBERSHIP:

- University of Tasmania
Bachelor of Arts
(*Geography and Public Administration*) (1981)
- University of Sydney
Master of Town and Country Planning (1988)
- Corporate Member and Fellow of the Planning Institute of Australia
- Certified Practicing Planner

OFFICES HELD

1996 – 1997:	National Vice President Royal Australian Planning Institute
1993 – 1998:	Member and Tasmanian Representative, Royal Australian Planning Institute National Council
1994 – 1996:	President Tasmanian Division Royal Australian Planning Institute
1988 – 1998:	Committee Member, Tasmanian Division Royal Australian Planning Institute
1995 – 1998:	Member, Sullivans Cove Advisory Committee
1996 – 1998:	Member Faculty Committee, Faculty of Architecture, University of Tasmania
1997 – 1998	PIA representative on the Australian Local Govt Association Technical Advisory Committee
1996, 1998:	External Examiner, Master of Town Planning Professional Project, University of Tasmania
2008 - 2011	Member Tasmanian Affordable Housing Ltd Evaluation Committee

EMPLOYMENT HISTORY

1978 – 1980:	Engaged temporarily, part time on Land Use / Heritage Studies during University vacations, Hobart City Council, Tasmania
1981 – 1982:	Trainee Town Planner, Rockdale Municipal Council, New South Wales
1982 – 1985:	Assistant Town Planner, Rockdale Municipal Council, New South Wales
1985 – 1987:	Assistant Town Planner Sutherland Shire Council, New South Wales
1987 – 1992:	Deputy City Planner, Clarence City Council, Tasmania
1991 – 1997:	Manager Planning Services, Clarence City Council, Tasmania
June 1997 – Present:	Director and Principal, Neil Shephard & Associates Pty. Ltd.

SKILLS AND EXPERIENCE

- Over 40 years involvement in land use and strategic planning, policy development and project management, and statutory planning;
- Appearances as an expert planning witness in relation to a broad range of planning related matters in:
 - The Land and Environment Court (NSW);
 - NSW Magistrates Court;
 - The Supreme Court of New South Wales;
 - The Resource Management and Planning Appeal Tribunal (TAS);
 - The Supreme Court of Tasmania;
 - The Magistrates Court of Tasmania;
 - The Liquor Licencing Board Tasmania;
 - The Resource Planning and Development Commission (TAS) and Tasmanian Planning Commission.

CAREER HIGHLIGHTS AND ACHIEVEMENTS

- Joined RAPI Tas Divn Committee in 1988 (prior to acceptance as a corporate member)
- Involved in the introduction of RAPI Peer Review programme;
- Introduced first coordinated CPD programme for RAPI Tas Division, in conjunction with RAI, AILA and ILS;
- Sat on reference committee for the drafting of *Environmental Management & Pollution Control Act 1994* and was involved in preparing initial EMPC implementation handbook and guidelines, and subsequent statewide workshops;
- Planning Institute rep on Sullivans Cove Advisory Committee during preparation of the *Sullivans Cove Planning Scheme*
- Sat on drafting committee reviewing the *Local Govt Act* subdivision provisions resulting in the current provisions;
- Prepared and delivered Integrated Coastal Management Assessment Training Modules (with Brian Risby and Catherine Nicholson);
- Was responsible for creating a Young Planner position on PIA National Council;
- PIA representative on ALGA for 2 years;
- Member of PIA National Council working party to design the first national CPD framework;
- Responsible for introducing specific position on National Council to better recognise and involve local government planners (including takeover of the LGPA) – subsequently elevated to a specific position of National Vice President;

- Involved in submissions and meeting on behalf of PIA during NCP reforms to gain formal recognition by Federal Govt of PIA as peak professional body for planners;
- 3 years whilst Tas Divn President negotiating to save the UTAS Environmental Design/Planning course from being removed by the Faculty of Architecture.

SIGNIFICANT PROJECTS

- Forestry Tasmania – Overall master planning and subsequent preparation of a Site Development Plan, planning scheme amendment and Development Application for the ‘Tahune’ tree-top skywalk and associated tourist development in south-west Tasmania (in association with Thompson and Brett Consulting Engineers, and Jacob Allom and Wade Architects);
- Hobart City Council - Preparation of a Site Development Plan for historic Dunn Place, Hobart (in association with Jacob Allom Wade Architects);
- Hobart City Council - Independent Assessment of DP & EMP for a Tourist resort at The Springs, Mt. Wellington;
- Clarence City Council - Independent Assessment of various Development Applications for redevelopment of Bellerive Oval/Blundstone Arena;
- Northern Combined Planning Authority - Independent Assessment of DP & EMP for Stages 1 and 2 of Tasmanian Natural Gas Pipeline proposal (in association with Sinclair, Knight, Merz);
- Department of Justice & Industrial Relations (Prison Services) – Preparation of Development Application for redevelopment of Risdon Prison (in association with Brian Risby Planning and Urban Design);
- Prudentia Investments – master planning of Cambridge Industrial Estate and preparation of subsequent planning scheme amendments;
- Hobart City Council – Independent Assessment of Development Application for Tramway proposal at Sullivans Cove, Hobart;
- Hobart Ports Corporation - general consultancy advice including preparation of submissions and representation at RPDC Hearings on behalf of the HPC;
- Glamorgan / Spring Bay Council – Independent Assessment of Development Application for Federal Hotels ‘Saffire’ Resort proposal, Waste-water Treatment Plant, and associated reticulation works at Coles Bay .
- Sorell Council - Review of Sorell Planning Scheme zonings for Sorell town centre and Midway Point and identification of strategic commercial opportunities .
- Lynmore Pty Ltd - preparation of Outline Development Plan (rezonings), and Site Development Plans for subdivision and land use resulting in 450 residential lots, a new commercial centre, school site, aged persons housing, and regional recreation space at Glebe Hill - in association with Southern States Pty Ltd, Lesley Gulson Landscape Architect, Craig Rogerson Surveyor, North Barker & Assoc., Tony Peters Traffic Engineer, and Thompson Brett Engineers;
- Fosters Group (Australia) – strategic review of Cascade Brewery land holdings in southern Tasmania (in association with Peacock Darcey and Anderson Surveyors).

- Malwood Pty, Trustees of the Roman Catholic Church, and Tranmere Point Pty Ltd - preparation of Outline Development Plan, masterplanning, and rezonings for subdivision and land use resulting in 350 residential lots, regional recreation space between Howrah and Rokeby - in association with Ferndene Studios, Cromer and Partners Surveyors, North Barker & Assoc., Midson Traffic, and JMG Engineers;
- TasPorts – preparation of strategic plan and subsequent planning scheme amendments in respect of Grassy port, King Island.
- University of Tasmania - preparation of Development Applications, and general consultancy to facilitate the co-location of the UTas Clinical School and the Menzies Research Centre in a new building on the corner of Liverpool and Campbell Streets, Hobart - in association with Lyons Architects and JAWS Architects.
- Australia's Alpine High Country Pty Ltd - preparation of Development Applications, and general consultancy to facilitate the establishment of integrated tourist accommodation on multiple sites adjacent to the Cradle Mountain World Heritage Area.
- Vaucluse Gardens Pty Ltd, Village Life, Roches Beach Living – preparation of Development Applications and various dealings with Councils in respect of retirement (independent and dependent) and aged persons housing.
- Dept Health & Human Services (Tas) – undertaking of scoping and feasibility exercise for a potential integrated community health centre on the Kingston High School site (in association with Ferndene Studios).
- Burnie City Council – preparation of Burnie West Coast Area Strategy Plan (in association with Ferndene Studios).
- Calvary Health Care – general consultancy over 25 years including preparation of Development Applications for individual redevelopment projects, revisions to statutory masterplans for the Lenah Valley campus, and various planning scheme amendments;
- Woolworths Limited – general consultancy over 19 years including preparation of Development Applications for individual supermarket and specialty shop development projects;
- Bruny Island Cruises – general consultancy with respect to statutory compliance matters and preparation of Development Applications for individual development projects involving relocation of the Bruny Island operation, new function centre and jetty;
- Doncaster BMW - general consultancy with respect to statutory compliance matters and preparation of including preparation of Development Applications for individual car showroom and dealership development projects in Tasmania.
- Hobart International Airport Pty Ltd – general consultancy including representations and submissions to the Tasmanian Planning Commission; and input into the Airport Master Plan.
- Hobart International Airport Pty Ltd /Australian Airports Association - preparation of draft Safeguarding of Airports Code for *Tasmanian State Planning Scheme*.
- Clarence City Council – preparation of planning application for Sub-Regional Sports and Recreational Facility at Seven Mile Beach (with Atleisure Planners).

APPENDIX C

SUMMARY AND RESPONSES TO REPRESENTATIONS

Response to Issues raised by Representors

No.	Representor	Theme of Submissions	Summary of Issues Raised	Response
1	Crown in Right of Tasmania	N/A	N/A	N/A
2	City of Hobart (Jennifer Lawley)	- Heritage - Activity and Use - Environmental Concerns - Transport - Urban form - Social and community issues - Economic impacts - Construction management - Noise - Site location	- Considers that the stadium will result in significant damage to places of heritage significance (including the Hunter Street precinct and Cenotaph) and Hobart's heritage tourism brand. - Considers the stadium at the site to be a lost of opportunity, noting it will be an inactive precinct for most of the year. - Considers that there are significant environmental concerns (refers to EPA submission). - Considers there to be a lack of critical transport infrastructure to support the stadium operation. - Notes the City of Hobart roles for the project. - Agrees with the DIAR's interpretation of the Project Scope. - Economic Impacts: - Notes that whilst significant local economy benefits may be experienced through the realisations of the Stadium the cost to the State and opportunity costs from the loss of realizing alternative development outcomes for the site outweigh these localised economic benefits. - Raises concerns about the ability of the State to finance the Project. HCC engaged SGS Economics and Planning to peer review the economic reports which concluded that the costs of the project are likely to be higher than indicated and the benefits are likely to be lower. Notes that this includes upkeep of the precinct which will be disproportionately borne by the HCC. - HCC also engaged AEC Group Pty Ltd to undertake LGA-focused economic impact analysis. The AEC Group found substantial benefits associated with the Project. - Considers that the Proponent's base case that the site is not developed to be implausible. - Social and community issues - Notes the proximity of the TSO and concurs with many of the issues previously raised by the TSO in its submission. - Aware of various concerns raised by the Federal Group, owner of the Henry Jones Art Hotel (including 56 luxury rooms), the MACq 01 hotel (including 114 luxury rooms) and operator of various businesses such as the Evolve Spirits Bar, the Story Bar and the Old Wharf Restaurant, all	- Heritage matters are addressed comprehensively in the respective report accompanying the Project Documentation, and further in Mr Gard'ners Statement of Evidence. - The concept of "Hobart's heritage tourism brand" is not established as all-encompassing, and cannot exclude the evolution of Sullivans Cove of the city. New developments and attractions occur all the time and are not necessarily related to heritage. Heritage is one element out of several that attract tourists to Hobart. - The degree of activity and use of the stadium is a management issue. - The issues raised in respect of economics, overall operational management, environmental matters, transport and movement, noise, vibration, reflectivity, aboriginal heritage, and construction management are more appropriately addressed by the other relevant experts. - Urban form, and matters related to scale and relationships to other buildings and parts of the Cove are addressed at length in my Statement of Evidence, Mr Goss' Statement of Evidence, the Planning Report (Ireneinc 2025) and the 2024 Site Development Plan. The PoSS has provided an opportunity to review previous analyses of the project Site and its relationship to the Cove and the city. A common finding of the above documents is that the Site is 'lost space', and perceptions of the 'traditional character' of the Cove do not apply to the Site. Also: that the Site provides opportunities for larger scale buildings than within the 'built wall'; and development of the Site does not necessarily impact on the heritage and urban form values within the 'Main Space' of the Cove.

			of which are located adjacent to and in very close proximity to the proposed development. ○ Considers concerns regarding the Royal Hobart Regatta Association. ○ Considers concerns raised by the RSL. ○ Considers that the reports do not adequately explain the stadium's use on non-event days. ▪ Visual Impact ○ Questions the likely effect of glare and reflectivity of the roof dome materials within the contextual setting of views specifically from elevated locations (s ▪ Noise ○ Considers that a noise policy should be designed to be unambiguous and outline absolute and measurable, numerical objective criteria to demonstrate during construction that the noise control requirements are being met and to assist with commissioning (on completion and during commencement of operation) that the noise criteria are being met. ○ HCC undertook a peer review of the information provided and has included the information in Appendix 8. ▪ Urban form ○ The City broadly agrees with the Panel's assessment that the size of the stadium is disproportionate to Hobart's small scale and established built form. ○ Considers that <i>"the stadium is a pleasing form in and of itself, and the use of timber and transparent aspects to the roof and the lower walls at the edges go some way to minimising the scale and bulk, however the relationships that are set up between the proposed stadium and the places and buildings around it are not respectful or complementary due to the unavoidable contrast in scale and visual bulk, and the long expanse of inactivated frontage on Evans Street."</i> ○ Consider that the <i>"intent of the quality and integration of the signage solutions throughout the site is largely endorsed, however it should be subject to the approval of a detailed signage plan"</i> ○ Refers to urban design response prepared by Leigh Woolley. ▪ Heritage ○ Notes reservations about the relocation of the Goods Shed.	
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			○ The City's Heritage Committee has expressed that Macquarie Point is not an appropriate location for a stadium due to its intrusive scale and form and its dominating visual impact. ○ Notes that Conservation Management Plans have not been provided for the Red Shed or the Goods Shed. ▪ Aboriginal heritage ○ Agrees with the DIAR that there has been a lack of engagement with the Tasmanian Aboriginal Community. ○ Annex prepared based on specialist advice obtained from Sharnie Read, Aboriginal Heritage Advisor from Paliti rruni – Island Spirit. ○ Considers that the Pre - Stadium Cultural and Landscape Values Assessment (Southern Archaeology, August 2024) is extensive but not culturally adequate. ▪ Use and Activity ○ Notes challenges with regards to parking and conflicting uses on the Upper Queens Domain. Suggests management options. ▪ Transport and Movement ○ Agrees with the DIAR that there are significant risks associated with crowd movements. ○ Asserts the importance of the Collins Street Pedestrian Bridge. ○ Agrees with the DIAR that <i>"there is a significant risk that large crowd events held at the stadium would negatively impact on the journeys of the public and other road users travelling to, from, or through central Hobart."</i> ○ Considers that existing pedestrian pathways and linkages are inadequate to cater for a significant redevelopment of the site. HCC suggests that in the event that a stadium is approved, a working group comprising representatives from key stakeholders (including City of Hobart, State Growth, TasPorts etc) should be immediately formed and tasked with progressing this key pedestrian upgrade. ○ Considers patrons are more likely to drive and park in the city. ○ Notes that HCC has <i>"no particular concern with short term road closures on local roads under the management of the City of Hobart (Evans Street, Hunter Street, Campbell Street etc) to facilitate safe and appropriate post event pedestrian movements, but also acknowledge that such</i>	
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			<i>closures (or lane closures) on the important state owned and managed roads (Davey Street, Macquarie Street, Tasman Highway and Brooker Avenue) would be much more disruptive and problematic</i> ○ HCC agrees that "<i>there is no developed design, cost estimate or construction methodology for a Collins Street pedestrian bridge sufficient for it to be able to be considered a key part of any proposed stadium development.</i>" Noting, however, that the bridge has been identified as an important future pedestrian linkage. ○ Refers to analysis undertaken by GHD (Appendix 7). ▪ Environmental effects ○ Agrees with the DIAR in respect of concerns relating to contamination, groundwater, stormwater management and disposal of excavated materials. ○ Raises concerns regarding light pollution from the stadium at night. Notes that it is important to see the visual impact of the key views at night. ○ HCC agrees with the DIAR comments as well as the issues raised by the EPA in its submission. Acknowledges that approval; conditions will need to be drafted. ○ Notes concerns relating to stormwater pipe ownership, drainage from stadium roof, and overland flow paths. ○ Considers that climate change factors have recently been updated and factors used in the Proponent's modelling are no longer current. ○ Considers that the Environmental values report does not address the possible impacts of increases in stormwater discharge on the marine environment. This assertion has not been confirmed or denied by the ecological report. ○ Agrees with the DIAR with respect to concerns about nearby landfill capacity. ○ Notes that the site is inherently subject to wind exposure, which is a characteristic feature of the area and presents challenges in terms of effective mitigation, particularly across concourse and gathering spaces ▪ Construction management ○ Agrees with the DIAR that there is a lack of detail for construction programming.	
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3	OurPlace (Roland Brown)	▪ Visual Impacts ▪ Planning ▪ Heritage ▪ Urban Form and Planning ▪ Use and Activity ▪ Construction program and sequencing ▪ Transport ▪ Economics	▪ Supports the analysis and identification of issues in the DIAR. ▪ Timothy Biles report, a review of response to the DIAR: ○ Notes that <i>"for all my experience and travels over the years I cannot identify a successful stadium development - modern stadia are unavoidably cumbersome."</i> ○ Notes that <i>"AFL-initiated projects to retrofit stadiums in inner urban areas are generally recognised as failures of planning and execution such as Waverley, and Marvel Stadium in Melbourne Docklands where it severed the connection between Docklands and Melbourne's CBD in an act of poor political leadership in concert with the AFL."</i> ○ Considers that the stadium is in the wrong place. ○ Identifies the following major flaws with the Project: ▪ <i>Its mass and scale are incongruent with the setting of Hobart, the nature of existing built form and the place that is Macquarie Point.</i> ▪ <i>It is in effect a single purpose activity that runs counter to established planning frameworks, the initial remit of the Macquarie Point Development Commission (MPCD) investigation and the work of Gehl in his 2010 report and others in their reports on Hobart.</i> ▪ <i>Similarly, it runs counter to the preferred Heritage outcome to not build it at Macquarie Point and counter to the comprehensive independent review by Nicholas Gruen and now the TPC.</i> ▪ <i>On a site that is prime water frontage in the core of Hobart it wastes opportunities presciently observed by Gehl, Gruen and the MPDC.</i> ▪ <i>It compromises and disrespects the place of the Cenotaph as a memorial to remembrance, which is currently poorly protected from a planning perspective and underappreciated in the stadium plans for Macquarie Point.</i> ○ Considers there to be opportunities missed with the Cenotaph. ○ Considers there to be poor community consultation. ○ Considers there to be poor consideration of visual and functional effect of stadium, now and over time. ○ Considers that the mass and bulk of the stadium will crowd the sanctity of the Cenotaph, <i>"negating its sentinel and visual location"</i>	▪ My responses in respect of Representation 2 above, apply equally to this Representation. ▪ Further, in respect of impacts on the Cenotaph: ○ Impacts on the Cenotaph are considered in my Statement of Evidence, Mr Goss' Statement of Evidence, Mr Gardner's Statement of Evidence, the Planning Report (Ireneinc 2025) and the 2024 Site Development Plan. It is acknowledged that the Stadium roof will have an impact on some views to and from the Cenotaph, as well as the immediate visual amenity. To a limited extent these impacts are mitigated by the apparent lightness (colour and texture) of the roof structure and potential additional landscaping, however the Stadium roof cannot be made invisible and will therefore have an impact. Given that the cultural significance of the Cenotaph will endure regardless of its visual surroundings, some consideration of balance is necessary in respect of the cultural role of the Stadium. Moreover, the setting of the Cenotaph has evolved over time, from adjacency to, and viewing of industrial development, a railway yard, road-freight hub, concrete batching plant, port operations including container and timber storage, berthed ships (including large cruise ships), car parking and vacant space. The Stadium represents another element in the evolving character of the Site and the city. ○ With respect to the quality of the renders chosen for visual impact assessment, I have relied on the detailed analysis and renders provided by Mr Goss/Orbit Solutions.
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			○ Considers that it squanders a site that is richer in opportunity than the introduction of a stadium. ○ With regards to visual impacts, considers that <i>"many of the renders have been chosen by the Proponents to put the siting of the stadium in its most favourable light. They appear to ignore the Best Practice Guide 10.2 Visual Simulations, 2010, Guidelines set out by the TPC in its February 2024 Guidelines or with the Victorian Civil and Administrative Tribunal (VCAT) requirements."</i> Notes, that as a result, <i>"the renders are prepared on "wide-angle" views toward the subject site which then leads to a diminishment and misjudgement of the visual impact of the proposal. An example is shown in the Urban Design Framework (2024, p. 74, Figure 75) where the Stadium is shown sitting behind the Royal Engineers building on the approach from the Brooker Hwy. The view is taken from the outbound lane where most turn their backs as they drive away to the north. There is a substantially bigger visual impact if the view is taken from the centre median at the traffic lights before the Royal Engineers where vehicles often pause and queue before entering the core of the City."</i> ○ Agrees with the DIAR with respect to the amphitheatre created by Sullivans Cove. ○ Agrees with the DIAR with respect to scale. ○ Considers that the stadium, seen from Rosny and the Derwent will be seen more <i>"as an elevation and its form read as aberrant with most existing structures because the distance of the viewing point from the object masks the 3rd dimension of depth and makes it read as an elevation. It has no articulation that can be described as breaking down the mass of this very large structure unlike the buildings behind in the core of Hobart and in that respect it will clearly contrast with its backdrop."</i> ○ Considers that <i>"The building design of the Stadium is too wide and the roof form aberrant."</i> ○ Agrees with the DIAR with respect to building alignment. ○ Considers that <i>"despite regular use, much of the time the proposed stadium's interface to the surrounding context would be inert."</i> ○ Considers that <i>"Evans Street will only be active at event times, effectively quarantining a portion of the city from frequent habitation and use."</i>	
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			○ Agrees with the DIAR that the stadium would be considered an <i>"an anomaly within the urban form of the city"</i>. ○ Considers that the <i>"stadium will be an overpowering element in that arrival sequence that is the antithesis of welcome"</i>, when it comes to the <i>arrival sequence</i> of Hobart. ○ Considers that the introduction of the stadium negatively effects a sense of place in Hobart for the Cenotaph and other locations. ○ Considers that the positing that <i>"the shape of the stadium reflects the topographic influences of Hobart is naïve in its observation. Wherever there are aspect views it is simply too large in scale and comparison with other structures to be considered acceptable."</i> ○ Summarises that <i>"the visual impact of this proposal destroys the 'sense of place' of so much of Hobart. It is nonsense to suggest that this structure has the qualities of a Sydney Opera House. It is not iconic. Macquarie Point is not the setting for a structure that is introverted in form and massive in shape and form compared to existing structures."</i> ○ Notes the design and planning protections afforded to the Shrine of Remembrance in Melbourne. Compares this to the Cenotaph. ○ Considers that the stadium <i>"would obstruct important sightlines, including views to the Derwent River, Mount Nelson, portions of Sullivans Cove and Battery Point."</i> ○ Considers that the role of the Cenotaph and the Regatta Point area need to be more explicitly protected and honoured in the formulation of plans. ○ Considers that the stadium does not fit within Hobart's topographic context. ○ Considers that access and circulation systems in Hobart are presently poor, limited passive surveillance and limited activation in key areas are also prevalent. ○ Considers that the stadium at Macquarie Point will exacerbate planning issues over time and a mistake that is difficult to remedy. ○ Considers that there is insufficient space to create parkland similar to the MCG, key reason why the site is unsuitable for a stadium. ○ Considers that when the stadium is not in use, there will be little activation. Further considers that it is not a 'welcoming' structure for cruise ships, repeats the mistakes of Marvel	
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			Stadium and is a 'poor front door' to Hobart. Considers that the site would be deserted when not in use as a single use structure. Notes that this is contrary to the Strategic Planning Principles. ▪ Timothy Biles report, review of SLR images: ○ Undertakes site visit as well as competing montages. Concludes that the <i>"overall visual impact assessment is deficient and fails to provide a balanced, objective assessment of the impact of the proposed stadium on the landscape character of Hobart."</i> ○ Considers there to be issues with the SLR Montages with the application of different focal lengths. ○ Considers the LVIA's comments on new views to the Cenotaph to be incorrect. ○ Considers that the stadium significantly changes the character of the Domain and views to the Derwent as well as the "reading" of Hobart's amphitheatre. ○ Considers the location of the stadium effectively destroys the relationship of the Cenotaph with the waterfront. ○ Considers it to be a <i>"completely disrespectful intrusion on the sacred atmosphere of this solemn place"</i>. ○ Considers that it will completely change the visual character of the landscape and spatial values, noting that <i>"a built form of such vast scale in close proximity to a finely grained CBD simply cannot "complement" the natural landforms – it stands in stark and massive scale contrast to all surrounding elements."</i> ○ Considers that the <i>"reflectivity of the EFTE material proposed for the domed roof should have been assessed as part of any visual impact assessment."</i> ○ Considers that <i>"the VIAR cannot be relied upon as an independent and objective assessment of the visual impact of the proposed stadium on broader Hobart:</i> ▪ <i>insufficient assessment of extent of relevant viewpoints, omitting Battery Point, the Tasman Highway and further afield;</i> ▪ <i>a lack of assessment of the broader landscape character of Hobart, its amphitheatre setting and the importance in that of the relationship between the Battery Point and Cenotaph headlands;</i> ▪ <i>a diminution of simulated visual impact in the adoption of wide-angle and panoramic</i>	
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			<i>photomontages rather than the "industry standard" 50mm focal length representation; > the omission of any contemplation of a "no stadium" scenario;</i> ▪ <i>a questionable apportionment of "magnitude of change" to the development in its setting and the subsequent further reduction of some of those allocations by vegetation of significant maturity (and consequently distant in time);</i> ▪ <i>omission of assessment of building materials on visual impact;</i> ▪ <i>a deeply flawed assessment of the visual impact against the various planning controls affecting Macquarie Point</i> ▪ <i>a pre-existing assumption of the stadium's existence in its response to planning controls and its justification of scale; and</i> ▪ <i>an inherent acceptance of the proposal and subtle support for the proposal within what should be an objective report.</i> ▪ Article entitled "The economics of stadium subsidies: a policy perspective" ○ Reviews theoretical and empirical evidence regarding economic justifications for public funding, focusing on recent research and contemporary development strategies, which continue to demonstrate that stadiums are poor public investments	
4	Tasmanian Conservation Trust (Peter McGlone)	▪ Contamination ▪ Groundwater	▪ Notes that broadly concerns with the State Government introducing enabling legislation. ▪ Considers that the information contained in the DIAR and the EPA Submission demonstrate that <i>"the Macquarie Point site is seriously contaminated and every effort need to be taken to understand the risks and impacts to inform the management"</i>. ▪ Considers that the DIAR does not adequately express the severity and extent of the contamination issues and the comprehensive failure by the proponent to address them. ▪ Considers the decision to include the car park to be a change in the development after the "rules" (i.e. Guidelines) have been finalised. ▪ Considers that the DIAR does not provide the emphasis and detail of the EPA's submission at paragraphs (a), (b) and (e) regarding contamination issues and places too much emphasis on the potential for contamination to cause construction delays and costs. ▪ Notes that the DIAR does not include <i>"any findings regarding Table 1B in the EPA submission, which assess the proponent's responses to the assessment criteria"</i>. Considers this to be an <i>"unnecessary demotion of the EPA's advice to being secondary and means that the</i>	No matters are raised that are within my area of expertise.

			<i>Draft IAR does not systematically assess the proposal against each assessment criteria, as the EPA submission does."</i> - Notes that the DIAR does not state what the consequences are for the Proponent for not providing sufficient information for a Contaminated Land Audit to be undertaken. Queries whether a recommendation for approval can be provided if an Audit cannot be done where required. - Considers there to be unaddressed information gaps regarding site contamination. - Considers there to be risk of contaminated groundwater associated with the car park excavation. - Considers that the EPA's recommendation of a Groundwater Impact Assessment to not be adequate given the Proponent's failure to provide information in reports. - Considers that the DIAR does not address the EPA's finding that the groundwater risks have not been adequately assessed, that ground water is not addressed in the Construction Environmental Management Plan, or <i>"recognize the gravity of the problem that will result."</i> - Considers that <i>"The TPC should make a final finding that is aligned with the EPA's findings and present a recommendation that states what should happen given the absence of any strategy for management of ground water."</i>	
5	Tasmanian Museum and Art Gallery (Mary Mulcahy)	- Transport - Parking - Noise - Heritage	- Considers that <i>"concurrent events"</i> within standard museum hours could exacerbate traffic congestion and reduce parking availability. Further, considers that this could increase noise and strain pedestrian safety and ultimately deter school groups and tourists. - Considers that there is a risk that construction vehicles, noise and vibration may hinder deliveries and introduce safety risks at principal access points from the Dunn Street car park and loading dock off Davey Street. - Notes that the heritage buildings lack soundproofing and prolonged construction noise and vibration could damage historic fabric and compromise sensitive artefacts. - Considers an influx of pedestrian traffic heightens the need for improved lighting, CCTV and emergency access around Customs House. - Considers further discussions needed for any unearthed archaeological remains or any storage/exhibition of Tasmanian footballing memorabilia. - Lists opportunities for collaboration, including traffic and access management, noise and vibration controls, security enhancements, archaeological protocols, public realm activation, sharing State collections and long term cultural infrastructure.	In my opinion the matters raised in this Representation are management issues that are capable of being addressed by appropriate Permit Conditions.
6	Tasmanian Symphony Orchestra (Caroline Sharpen)	- Noise and Vibration - Financial impacts to TSO	- Considers the most at-risk TSO activity is the broadcast, recording, streaming and video-on-demand business. - TSO engaged acoustic, legal and financial consultants to i) assess and quantify the potential impact of the project on FCH and Orchestra Centre at 1 Davey Street, and ii) identify ways those impacts might be mitigated or ameliorated. - Considers that the total cost of proposed controls is \$4.45million. - Requests permit conditions that require: <i>The proponent to meet the costs of engineering controls to protect Federation Concert Hall and the Orchestra Centre</i>	No matters are raised that are within my area of expertise.

			<i>from noise and vibration impacts. Also to meet the flow-on effect costs of implementing the engineering controls;</i> ○ <i>TSO to be compensated should it have to cancel scheduled concerts or commercial activities;</i> ○ <i>Completion of a Preliminary Construction Noise and Vibration Assessment and a Detailed Noise and Vibration Management Plan for construction contracts;</i> ○ <i>Operational Controls for the continuing operation of the stadium post-construction;</i> ○ <i>Adoption of the powers and measures under the Environmental Management and Pollution Control Act as the principal enforcement mechanism.</i> ▪ Considers that operational impacts include: ○ Loss of current use of FCH ○ Costs associated with temporary relocation of the TSO and rehearsals ○ Impairment of livestreaming and video on demand product (loss of national and international customers). ○ Loss of audience to day time concerts, education and training activities. ▪ Considers financial impacts include ○ Reduced concert attendance and performance income ○ Reduced recording, livestreaming and video-on-demand income ○ Reduced position in international market – brand impacts for TSO and Tasmania. ○ Increased performance provisioning costs. ▪ Considers POSS Submission Appendix Q Noise and Vibration assessment insufficient in detail on mitigation effects. ▪ Notes that the DIAR consider noise impacts are likely. ▪ Suggests risk mitigation strategies relating to engineering controls, management controls and legislative controls. Suggests that these be considered in permit conditions. ▪ TSO commissioned ARUP to undertake a preliminary assessment of the impact of noise and vibration on various recording and performance scenarios across the FCH and TSO studios: ○ Considers that on review of the POSS report's acoustic assessment, areas are inadequately addressed, including <i>"No limitation on number or types of events", "No limitations on noise emissions", and "No assessment of impact to indoor operational uses – i.e. to impacts to recording, broadcast, performance or rehearsal at the TSO".</i> ○ Considers that the stadium activities will <i>"Very Likely"</i> have impacts on the TSO Studio audibility and recording during <i>"High Intensity Concert"</i> mode. ○ Considers other activities at the stadium <i>"Unlikely"</i> to have an effect on TSO Studio or Concert Hall. ○ Considers mitigation options (remove source, provide engineering controls, provide management controls). ○ Considers the POSS Submission Construction Management Plan.	
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7	Dr Graham Wells	Economics (CBA)	- Considers that the non-use value of the stadium is restricted to Hobart residents when it should cover the State as a whole. - Considers that in a more comprehensive report, <i>"non-use benefits could be evaluated by using a contingent valuation approach... it has been used successfully to evaluate willingness-to-pay for non-marketed resources such as national parks."</i> - Considers that the effect of some financial clauses in the Club Funding and Development Agreement are included but other are not, including: - An annual operational funding grant from the Tasmanian government of \$12m is specified in the Agreement [10(1)c] and is included as a cost item in the Interim Report's cost-benefit analysis. - The Agreement requires the construction of a Training and Administration facility, the cost of which is borne by the Tasmanian government [B(a), G(a)]. This cost is not included in the Interim Report. - Although not included in the Agreement, the Interim Report includes as a Statewide benefit, the assumption that the AFL will contribute \$350m over 10 years to the development of football in Tasmania. [1.1(mm)]. Considers that the first two points should be included in the CBA but not the third. - Considers that with regards to the Federal Funding Agreement should only include residual funding rather than the full \$240m (noting that it is for the redevelopment of the wharfs and housing at Regatta Point). - Considers that the DIAR should be updated to include more detailed discussion on private investment issues and that the terms of investor contracts be made available to the Parliament before voting on the project.	No matters are raised that are within my area of expertise
8	TasWater (Anthony Cengia / Jason Taylor)	Stormwater (Developer Charges)	- Considers that the proponent needs to submit a detailed outline of past and present uses of the site so that TasWater can understand the historical capacity that runs with the land and determine what developer charges are applicable to the project now. - Considers that TasWater should be afforded the ability to condition that developer charges are due and payable at the construction approval stage, which will be prior to the issue of a Certificate for Certifiable Work (Building and or Plumbing). - Considers that the past and present uses should be outlined on a simple table, and attributed with Equivalent Tenements as described in TasWater's Supplement to WSAA Sewerage Code of Australia – MRWA Edition	No matters are raised that are within my area of expertise
9	Federal Group (William Manning)	- Concerns relating to POSS process and consultation - Stadium location (heritage, enabling infrastructure, spatial restriction) - Heritage	- Considers that there has been no attempt by the proponent to address, resolve or acknowledge the issues the FG has raised. - Considers that the DIAR does not document, test or mitigate material impacts experienced by adjacent operators.	The PoSS process provides the statutory basis for consideration of the proposal. The process was initiated by Parliament and the TPC were directed by the relevant Minister to follow the process. Any suggestion that this has not occurred properly is a matter for legal submission.

		▪ Roof reflection ▪ Noise ▪ Transport ▪ Economics (introducing a competitor into the market) ▪ Visual impact ▪ Planning (precent effect) ▪ Business impacts ▪ Opportunity cost ▪ Impact on Heritage Tourism ▪ Lighting	▪ Considers that the Proponent has failed to provide adequate documentation on construction traffic impacts. ▪ Notes that there is no mitigation strategy detailing how construction noise, operational disturbance or curfew exemptions will be managed. ▪ Requests: ○ Consultation directly on stated outstanding matters once the relevant documentation becomes available. ○ Defer finalisation of the IAR until this documentation is publicly exhibited and the resulting representations have been considered. or The opportunity to provide feedback to the Panel in relation to the material. ○ In the event that final recommendations proceed before resolution of these issues, the Panel include binding conditions requiring future integrated assessment of any new or revised development parameters. ▪ Considers that the site cannot support the proposal without extreme mitigation measures that fall both within and outside the project scope. ▪ Considers that the stadium's volume, height and footprint are wholly inconsistent with the built form and grain of surrounding precinct. ▪ Considers that the primary issue is not how the stadium is expressed architecturally but whether it should exist in this location at all as it <i>"permanently alters the spatial hierarchy and historic character of the precinct."</i> ▪ Submits that mitigation is not a viable heritage mitigation strategy in these circumstances. ▪ Considers that the stadium would affect the future interpretation of the Sullivans Cove Planning Scheme. Noting that even if the project itself cannot be assessed under it, <i>"future development proposals would be assessed in reference to a built form whose characteristics are explicitly acknowledged to be out of step with the surrounding area. This would effectively create a precedent condition that weakens or nullifies the planning scheme's ability to regulate development in accordance with the existing character and scale of the precinct."</i> ▪ Submits that the Panel consider precedent effect, noting that it is not sufficient <i>"to simply identify the stadium as incompatible with the site; the broader planning consequences must be considered to understand the full heritage and broader economic impact"</i>. ▪ Submits that the final order issued for the Project (if approved) must include:	▪ Assertions of deficiencies in expert reports or the DIAR are matters for the TPC to consider having regard to the expert evidence provided. ▪ My responses to Representations 2 and 3 (above) address the remaining matters in this Representation.
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			○ Defined limits on the scope of development, including maximum building envelope, function capacity, and external use parameters; ○ A requirement that any future expansion or material alteration not already assessed under the current IAR process must be subject to a new integrated assessment; ○ The imposition of binding heritage, design, and interface conditions that reflect the intent and effect of the Sullivans Cove Planning Scheme 1997, regardless of its legal displacement. ▪ Considers that the DIAR does not adequately assess the impact of reflected and refracted light from the stadium's proposed roof. Further notes that glare has the potential to disrupt ceremonial, heritage, and tourism experiences, including the solemnity of nationally significant commemorations such as the ANZAC Day dawn service at the Cenotaph. ▪ Requests that the Panel request the Proponent to provide a Glare and Reflectivity Impact Assessment conducted and prepared by an independent expert. ▪ Considers that <i>"the development of a stadium capable of hosting corporate functions, events, and food and beverage operations introduces a direct competitor into the market. Without a binding requirement to ensure commercial neutrality, there is a high risk that public facilities could be used in ways that distort competition."</i> ▪ Considers that the stadium <i>"offers a fixed-use, episodic program with a materially negative net present value and an enduring reliance on public subsidy to remain financially viable. Its operation is not self-sustaining and would impose long-term structural pressure on the State's fiscal position. It does not amplify existing precinct activity; it overrides it. Its operational footprint crowds out flexible public space, its traffic and security demands restrict access to adjacent businesses at peak times, and its event-driven character imposes volatility on an area that depends on predictability. In market terms, it does not stimulate competition, it suppresses it by reducing the commercial reliability of surrounding assets."</i> ▪ Considers that the <i>"opportunity cost lies not in underutilisation of the site, but in the disruption of a precinct that already delivers more"</i>. ▪ Considers that the stadium would not increase foot traffic but displace it. ▪ Considers that the transport strategy will not result in behavioural changes. Notes that private vehicle use on event days is expected to be higher than modelled.	
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			▪ Considers there to be insufficient onsite parking. Notes that this will effect customers and employees at surrounding businesses. ▪ Considers that road closures remove access for essential services for surrounding businesses (valet, taxi, coaches, deliveries). ▪ Notes disruptions to Evans St during construction, disrupting the primary point of access for properties. ▪ Considers there to be unaddressed construction noise risks to business viability for neighbours. ▪ Considers a lighting exemption to be inappropriate. Notes light spill to neighbours is a foreseeable risk to amenity, particularly for hotel guests. ▪ EMRS Statewide opinion poll annexed to report.	
10	Dr Kate Shield	▪ Scale of Stadium ▪ Location of the Stadium ▪ Additional costs ▪ Construction Management ▪ Loss of amenity ▪ Noise ▪ Light ▪ Wind ▪ Overshadowing ▪ Crime ▪ Cenotaph ▪ Heritage ▪ Aboriginal Cultural Heritage ▪ Opportunity Cost / Social Impacts of site. ▪ Urban Design ▪ Heritage	▪ Considers the structure too tall ▪ Consider the structure too broad ▪ Considers the footprint too large ▪ Considers the location and site selection process to be flawed. ▪ Considers there to be additional costs related to the rehabilitation of the site. As well as moving the underground sewer line. Considers the need for a roof to add \$200m. ▪ Considers there to be insufficient room on the site for building materials, offices, facilities and parking. ▪ Considers truck movements in reports to be unrealistic. ▪ Considers there to be amenity impacts on local residents with respect to traffic, noise and pollution. ▪ Considers pile driving hammer blows may reach peak levels of 220 db near source and 180 db a kilometre away. Further considers noise effects on Federation Concert Hall, UTAS, Grand Chancellor and Royal Hobart Hospital. Considers that TSO will be effected. ▪ Considers there to be light impacts on fauna. ▪ Considers that the stadia intensify wind issues in Hobart. ▪ Considers that the height of the stadium will cast long shadows over Evans Street and 'historic precinct'. Considers that relocating the Goods Shed would be "<i>anathema to anyone with an ounce of appreciation for the industrial heritage of the site.</i>" ▪ Suggests that crime patterns show an increase in crime around stadia. ▪ Considers that the stadia will impact the amenity and quiet contemplation of the Cenotaph. ▪ Considers that the stadia overbears and dwarfs historic Hunter St façade and Engineers Building. ▪ Notes the previous Truth and Reconciliation Park Project for the site. ▪ Considers that there is an opportunity cost for the site. Suggests other projects on the site would create more "genuine" Tasmanian jobs, not as large, not as tall, other visions more appropriate (housing, public venues, parks and commerce). ▪ Criticises urban design as "<i>rather forbidding environment, with large swathes of hard surfaces and impermeable walls that exclude and repel users most of the time.</i>" ▪ Considers there to be social impacts to RSL and Aboriginal Tasmanians.	My responses to Representations 2 and 3 (above) address the remaining matters in this Representation.

11	Professional Historians' Association Vic/Tas, Australia, and NSW/ACT (Naomi Parry Duncan)	- Scale and height - Visual impacts - Heritage - Aboriginal Cultural Heritage - Ancillary heritage impacts (transport, noise, lighting) - Economics (impacted heritage tourism) - Stadium location - Planning	- Considers the scale for the stadium inappropriate for Hobart. - Notes that only buildings above 40m (10 storeys) in Hobart are confined to the CBD north of Macquarie Street. Considers that it would dwarf surrounding buildings: <i>"The proposed stadium would be 40 metres taller than the historic Henry Jones IXL Buildings. It would be much taller than the Marine Board Building (39 metres) and the Hotel Grand Chancellor (42 metres), which are already discordant on the waterfront. The stadium would be higher than the heritage Gasworks Stack (38 metres), the Hydro-Electric Building (46 metres) and the Hobart Cenotaph (45 metres)"</i>. - Notes the height limitations in the Sullivans Cove Planning Scheme. - Disputes proponent's assertion that the building would be iconic. - Considers that <i>"the stadium would have deleterious effects on surrounding heritage"</i>. - Notes that the Stadium would block views from the Cenotaph. - Considers that the Henry Jones IXL Warehouses would be dominated. - Considers that the Red Shed would be "lost". - Considers the Goods Shed would be removed from its fabric. - Considers that there <i>"seems there are no plans to assess the extent of Aboriginal occupation on the site, through archaeological investigation, or to properly engage with Palawa/Pakana people to assess cultural heritage elements."</i> - Considers that the stadium would intrude views from Salamanca, Kunyuni/Mt Wellington and MONA ferries. - Does not think a stadium should be built on the site. - Commended the Purcell and GJM study: <i>"endorse the views of Purcell/GJM, who have diligently reported the serious consequences of this construction for many key items in the Sullivans Cove Precinct, and Hobart more broadly."</i> - Considers that <i>"the stadium does not belong on this narrow, constrained site, where it will have such a monumental impact on cultural heritage that is significant not only to Tasmania, but the nation."</i> - Considers that <i>"stadium would be out of scale with neighbouring buildings, contrary to the general nature of the Cove, obstruct views and vistas, compromise the quality of spaces and buildings within the Cove, and threaten its unique historic cultural heritage."</i> - Considers there to be flow on risks that more high rise buildings will be developed in Hobart.	My responses to Representations 2 and 3 (above) address the remaining matters in this Representation.
12	Tourism Industry Council Tasmania (TICT) (Amy Hills)	- Economics (CBA) - Social and Cultural Impacts - Transport	- Considers the DIAR to be a one-sided dialogue by failing to consider non-significant issues or issues that the Commission agreed with. - Considers that major sporting or cultural events could be held at the Stadium - Considers the stadium could host business and conference events. - Considers that the stadium will deliver a boost in interest in travel to the state. - Questions the downgrading of assumptions relating to interstate visitation. - Considers that the DIAR fails to take into account that a higher proportion of expat Tasmanians are likely to travel to watch Devils matches. - Considers that the DIAR does not consider retained or extended visitation by way of "exposure".	No matters are raised that are within my area of expertise

			- Considers that the project should not only be assessed purely through the lens of narrow economic costs benefit grounds. - Considers the stadium to be transformational to Tasmania's events future. - Considers the stadium will open up a new business events market in Tasmania. - Notes the DIAR has considered the stadium as a stand alone piece of infrastructure through a narrow lens rather than recognising the transformation of the cities brand, improvement of education pathways and employment/ - Considers the investment of the stadium to be important as a 'confidence signal' to those assessing whether to continue to build or invest in Tasmania and flow on effects. - Considers that transport issues should be worked through. However, notes that all stadia in the world encounter traffic congestion.	
13	Daphne Habibis	- Aboriginal Cultural Heritage - Consultation with Tasmanian Aboriginal Communities	- In summary: - Firstly, the risk that the proposal for the construction of an AFL stadium will result in a lost opportunity for meaningful action on Tasmania's reconciliation with Aboriginal people. - Secondly, while the Draft Integrated Assessment Report (IAR) appropriately highlights several significant concerns relating to Aboriginal heritage, respect for Aboriginal historical, spiritual and cultural values, and the adequacy of information to assess these —it falls short of fully exposing the failings in the Macquarie Point Development Corporation's (MPDC) consultation process. - The MDPC's Annexures N and O shows that consultation with Aboriginal communities has been rushed, superficial, and procedurally inadequate. It falls short of key codes and standards, including the AIATSIS Code of Ethics, the IAP2A Quality Assurance Standard, and the expectations of Aboriginal Heritage Tasmania - Notes no reference to the construction of an Indigenous Cultural and Heritage Centre. Notes Aboriginal Heritage Council strong disappointment in this regard. - Notes change from original plan for Reconciliation Park. - Considers community engagement insufficient. <i>"As a project of national significant, the proposed Macquarie Point Stadium is required to demonstrate broad community engagement, not just legal compliance. In the Indigenous context, relevant frameworks are the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), the AIATSIS Code of Ethics and Aboriginal Heritage Tasmania.</i> - Notes that key organisations, including the Tasmanian Aboriginal Centre (TAC), MTWAC and SETAC, were either unresponsive or declined to participate.	No matters are raised that are within my area of expertise
14	Cuan Petheram	Economics (Cost Benefit Analysis)	- Agrees with DIAR on visitation %. - Considers 2.5 nights stay in the DIAR too high. - Considers interstate numbers in DIAR too low, based on his attendance at BBL games it should be less than 1%. - Considers that further offset should be considered for Devils supporters travelling interstate to support their team. - Considers that Test Cricket should not be considered a new event.	No matters are raised that are within my area of expertise

			▪ Gives weight to non-use value ▪ Questions social and cultural benefits, including health benefits. ▪ Considers Commonwealth contribution to the stadium be excluded. ▪ Notes cost overruns including roof issue.	
15	National Spiritual Assembly of the Baha'is of Australia	▪ Transport ▪ Parking	▪ Concerned about land being acquired for the purposes of pedestrian access from the stadium to Collins Street: ○ <i>"The proposed pedestrian movement across our property fundamentally threatens not only the physical and built form integrity of the Bahá'í Centre of Learning but also its spiritual atmosphere and operational viability. The presence of a sizeable pedestrian infrastructure directly over our property would significantly compromise and disrupt the functionality of the current land use, and will profoundly alter the environment of a facility that holds deep cultural and spiritual significance to the local and broader Baha'i community of Tasmania."</i> ▪ Notes concerns that <i>"the Transport and Event Traffic Management Plan(s) do not recommend any event related traffic alterations in the vicinity of the Bahá'í Centre of Learning site and associated vehicle access points."</i> ▪ Concerned that the parking demand during the construction phase, daily use and major events is likely to have a significant amenity impact on Bahá'í Centre of Learning operations	The issues raised are more appropriately addressed by the other relevant experts, noting that they appear to be management issues capable of resolution.
16	Jerry De Gryse	▪ Planning ▪ Visual ▪ Transport	▪ Compliance with established planning principles of Sullivans Cove. ▪ Stadium size is disproportionate to Hobart's scale and contrary to visual values. ▪ Concurs with DIAR section 3.1 and 3.2 that stadia built form is overbearing. ▪ Concurs with DIAR section 3.3 regarding lack of adequate street level amenity. ▪ Impacts on Cenotaph and Regatta grounds and Lower Domain Precinct are substantive and unacceptable. ▪ Inadequate transport and pedestrian access.	My responses to Representations 2 and 3 (above) address the remaining matters in this Representation.
17	Cricket Tasmania / Cricket Australia (Alison Turner)	▪ Design (roof, stadium orientation, pitches) ▪ Economics (ticketing, memberships)	▪ Considers that the proposed roof structure casts a grid like pattern of shadows that moves across the field of play, particularly on the cricket pitch – presenting unacceptable playing conditions. ▪ Notes that mitigation options do not eliminate the shadows or are temporary in nature and introduce other issues. ▪ Notes that until the concerns are overcome, CT and CA are unable to confirm that the events calendar is reliable. ▪ Notes that CT and CA are committed towards achieving ICC accreditation for the stadium.	No matters are raised that are within my area of expertise
18	Barry Neilsen	▪ Parking	▪ Note owner of apartment complex at 15 Hunter St (unclear whether this is the Zero Davey Apartment Buildings). ▪ Concerned about access to apartment building during major events at the stadium because garage access is on Evans Street. ▪ Seeks condition that access to the entrance to carpark from the corner of Davey and Evans Street be maintained at all times.	The issues raised are more appropriately addressed by the other relevant experts, noting that they appear to be management issues capable of resolution.

19	Tasmanian Heritage Council (Russell Dobie)	- Heritage - Visual (including impact on Cenotaph) - Design (size and signage)	- Concerned about heritage as the relevant regulator under the Historic Cultural Heritage Act 1995 and significant effects on places in the Tasmanian Heritage Register - Considers that the Commission has identified all the relevant issues in relation to heritage listed places based on the information provided by the Proponent. - Concerned about the size, bulk and form of stadium. - Considers that the <i>"relocation adaption and future use of the Goods Shed could be better considered to improve opportunities for the demonstration and interpretation of the building's historic cultural significance in relation to transport infrastructure, as well as to allow for improved community engagement with the heritage structure."</i> - Concerned about the visual impacts on heritage places and waterfront area, - Concerned about the visual impacts of the size of stadium naming signs - Concerned about impacts on the Cenotaph, Red Sheed and Goods Shed (heritage value and character) - Concerned about the impacts of construction on the surrounding heritage and archaeological areas. - Considers proposed conditions raised in Proponent's heritage report to be appropriate. - Proposes additional matters to be included in the Conservation Management Plan, including those relating to the Stadium signage, the Goods Shed, the Royal Engineers Building, the Cenotaph, Evans St and general precautions.	- Heritage matters are addressed comprehensively in the respective report accompanying the Project Documentation, and further in Mr Gard'ners Statement of Evidence. - Urban form, and matters related to scale and relationships to other buildings and parts of the Cove are addressed at length in my Statement of Evidence, Mr Goss' Statement of Evidence, the Planning Report (Ireneinc 2025) and the 2024 Site Development Plan. The PoSS has provided an opportunity to review previous analyses of the project Site and its relationship to the Cove and the city. A common finding of the above documents is that the Site is 'lost space', and perceptions of the 'traditional character' of the Cove do not apply to the Site. Also: that the Site provides opportunities for larger scale buildings than within the 'built wall'; and development of the Site does not necessarily impact on the heritage and urban form values within the 'Main Space' of the Cove.
20	Glebe Residents Association (Kerry Burns)	- Heritage (cultural and aboriginal) - Design (height, bulk) - Planning - Visual - Economics (financing) - Parking - Transport (traffic and public transport) - Environment	- Concurs with the matters raised in the DIAR - Concerned about the character and welfare of the Glebe community in Hobart. - Concerned about heritage and cultural heritage impacts of the stadium - Concerned about the height and bulk of the stadium - Concerned about the visual impact on surroundings - Concerned about the economic viability and financing - Considers that the stadium prevents other public uses at the site and limits public access - Concerned about parking impacts in nearby Glebe and other surrounds of the stadium. - Concerned about potential impacts on the Queens Domain, in particular those related to extra traffic, parking and rubbish. - Concerned that an influx of pedestrians into Glebe following major events carries the risk of anti-social behaviour and litter. - Concerned about traffic and public transportation and lack of plan to accommodate these demands - Concerned about the impact of heritage and cultural values including on smaller scale heritage buildings, what this means for heritage tourism economy, and social and cultural impacts to the Cenotaph. - Concerned about the aboriginal cultural heritage impact. Refers to previous MONA reset plan. - Concerned about impact from the Northern Access Road. - Concerned about noise impacts to the TSO. Further considers that noise issues are currently experienced by Glebe residents from existing Macquarie Point activities and notes that the Proponent <i>"appear not to have fully examined how noise impacts will be mitigated."</i>	My responses to Representations 2 and 3 (above) address the remaining matters in this Representation.

			- Concerned about environmental sustainability (noise, stormwater system, flooding, soil contamination) - Key issues identified for Glebe: traffic and parking, noise, potential impacts on Queens Domain, post event impacts	
21	Ian Terry	- Heritage (Cenotaph) - Visual impact - Transport (traffic) - Economics (cost benefit analysis)	- Fully supports DIAR - Concerned about the impact of the stadium on heritage values of the cenotaph and Hobart waterfront/CBD. Notes the history underpinning the selection of Macquarie Point as the location for the Cenotaph "<i>as it would be clearly visible throughout the city, from the river and from nearby suburbs, to draw the attention of Hobart's residents and remind them of the sacrifice made by its citizens serving during WW1 and in later conflicts.</i>" - Concerned about the visual impact of the stadium, minimising the impact of the Cenotaph - Concerned about the impact of traffic and bottlenecks - Concerned about the financial burden on the community	My responses to Representations 2 and 3 (above) address the remaining matters in this Representation.
22	Tasmania Football Club (Brendon Gale)	- Economics (TFC viability, tourism) - Social and cultural impacts	- Notes the stadium as a non-negotiable condition of the licence for the TFC - Considers the stadium is integral to establishing competitive viability for the TFC - Considers the stadium and TFC will have statewide social and economic benefits - Considers the stadium and TFC will increase community identity and pride - Considers the stadium and TFC will increase youth engagement and development - Considers the stadium and TFC will increase cultural enrichment and inclusivity - Considers the stadium and TFC will have a direct economic impact on Tasmania and Hobart through creating jobs, boosting tourism and supporting local businesses with multiple sporting and major events - Considers the stadium and TFC will unite Tasmania and transcend traditional regional divides	No matters are raised that are within my area of expertise
23	Stadiums Tasmania (James Avery)	- Economics - Social and cultural impacts - Location - Security, event management, patron movement - Noise - Lighting - Traffic	- Considers aspects of the DIAR underplay the potential of the stadium to host a range of events and to act as a stimulus for cultural and sporting events at the stadium, around Hobart, and Tasmania - Considers the proposed location identifies the stadium as an exciting attraction - Notes that the DIAR did not comment on conditions which can be leveraged to manage operational effects of stadium such as event management, noise, lighting, patron movement, security, and traffic.	I am able to comment on the final dot point. The DIAR is presented as an 'issues-based' assessment and <i>prima facie</i> does not delve into operational detail. Accordingly, there are areas normally associated with operational management that are not acknowledged in the DIAR and/or could be addressed through appropriate Permit Conditions. It is possible that the TPC have generated background reports that inform the DIAR, but if so they have not been made available, and if not it is unclear how or why some of these management matters have not been addressed. By contrast the Draft Permit Conditions do address most if not all of these management issues through requirements for management plans, on-going reporting and monitoring.
24	Jeanette McDonald	- Visual impact - Noise - Social and cultural impacts (privacy, littering and vandalism) - Transport - Parking - Heritage	- Generally supporting of the DIAR - Concerned about impact of proposed bridge to Collins Street regarding the view and subsequent impact on resale value of the representers apartment - Concerned about the noise disturbance from the bridge to apartment - Concerned about risk of littering and vandalism from patrons using the bridge - Concerned about access and privacy with increased crowds and potential for onlookers to view into the representer's apartment	- My understanding is that the proposed bridge to Collins Street is a matter raised by Council for consideration. It does not form part of the PoSS, but may form part of a future (Council) overall pedestrian management plan. It is a matter for future planning, which under normal circumstances it would be expected that Council and Department of State Growth would consult with stakeholders and affected parties prior to committing to such a project. - It is not clear how or in what sense it is asserted the Stadium would impact on the "history wall, water feature and Wapping area". I am therefore unable to respond to this issue.

			- Concerned about the impact of the stadium and associated crowds to the surrounding areas for movement on foot or in a car and limited availability of parking caused by stadium events - Concerned about the loss of heritage from the impact on the history wall, water feature and Wapping area - Considers the following issues as oversights in the DIAR - Item 6.2.4(a): omission of consideration of residential accommodation - Item 6.2.4(d): only mentions vehicles, not pedestrian difficulty against the crowd - Item 7.1.1(i): should mention that congestion will be exacerbated with the start or end of events at the Theatre Royal	Matters of crowd management and any potential clash with Theatre Royal events are management issues capable of resolution through appropriate Permit Conditions.
25	Bruce Levett	- Economics (financing) - Size (too small) - Planning - Location - Social and culture impact	- Considers that the DIAR adopts the correct approach with regards to a broad scope to <i>"include all ancillary infrastructure costs relating to the efficient operations of the stadium once completed, including items that relate to the stadium but incurred outside event time, for example, any transport infrastructure or services that are brought forward due to the stadium build including their ongoing operational and maintenance costs"</i>. Further notes, <i>"The Minister argued that the State Planning Commission (SPC) went outside the scope as directed by Parliament as the main reason for rejecting the draft report. To me, this simply means that Parliament erred when drafting such a narrow scope in the first place and the SPC sensibly included all costs in their report, and that all the ancillary costs should remain in the final report."</i> - Considers the financing of the stadium, including contingency price, total budget and financiers must be considered. - Considers that <i>"the total budget needs to include not just the stadium build, but every other item that makes the stadium operate efficiently and safely."</i> - Considers the size and design may not be fit for purpose based on the interest in TFC as it may be too small to accommodate demand, noting it may <i>"result in many Tasmanians, and Devils members being priced out of a seat and the opportunity to watch their team live, resulting in the seats potentially becoming elitist and expensive."</i> - Considers that the size of the stadium is too small, the location restricts future expansion and development, will have a negative legacy with regards to access to games and amplifies the risk that the stadium will be overcapitalised. - Considers that there is a need to see detailed precinct plans around the stadium - Considers there was insufficient community engagement with the site selection - Considers there is a need to strategically design the community legacy (generating urban and social renewal, supporting lower socio economic locations, impacting housing, homelessness and transport, and providing an equal opportunity to all Tasmanians). - Notes that AFL games will be split between Hobart and York Park. - Considers that benefits associated with the TFC should not be associated with the stadium	- Governance matters are variously the responsibility of the TPC, Parliament, and if necessary should be subject to legal submission. - Other matters raised are more appropriately addressed by the other relevant experts.

26	Milan Prodanovic	- Location - Economics (cost benefit analysis) - Traffic - Planning	- Considers that the location of the stadium would be detrimental to the existing social and cultural significance of the area, likens the area to circular quay in Sydney and as the most special and history area in Hobart and Tasmania. - Considers that there is inaccuracy or lack of transparency with the cost of the project, potential revenue for the stadium and inaccurate benefits - Considers that the economic and social benefits for Hobart are overstated (job creation, tourism, revenue to surrounding areas) - Considers the proponent's estimated car use to get to the stadium is incorrect and there will be issues with parking and traffic - Considers, with regards to traffic, that <i>"The areas immediately to the west and north of Macquarie Point will be saturated with car parking at all times of the day during significant events at the stadium. This will be the parking area of first choice, not the council car parks. It will greatly affect access to customer parking for businesses, even restaurants outside normal business hours, into the evening. It will require quite major changes to current parking restrictions to address the problem, including in the Glebe and other residential streets with limited off street resident parking."</i> - Considers that <i>"project cost does need to include the costs of all works that would need to be undertaken to support such a development, including road, footpath and changes to traffic management (traffic signal) as well as the bus route along the railway line (which the government said would replace the need for large car parking provisions at the venue)."</i>	My responses to Representations 2 and 3 (above) address the remaining matters in this Representation, to the extent of my expertise.
27	Friends of Soldiers Memorial Avenue (John Wadlsey)	- Heritage and cultural significance - Size and Bulk - Community engagement - Visual impact	- Concerned with the visual impact to the Cenotaph and adjacent Soldiers Memorial Avenue and heritage values. - Concerned with the lack of ongoing engagement from MPDC and lack of design amendments following consultation. - Considers that the height, size and bulk of the stadium will <i>"totally dominate and degrade our most significant remembrance landscape as well as destroying the sightlines from the Cenotaph to Sullivans Cove."</i> - Considers that <i>"The stadium design is an affront to everything the Cenotaph Precinct represents – service, sacrifice, reverence and commemoration."</i> Notes, the planning protections for the Shrine of Remembrance in Melbourne.	- Governance matters are variously the responsibility of the TPC, Parliament, and if necessary should be subject to legal submission. - Heritage matters raised are more appropriately addressed by the other relevant experts. - My responses to Representation 3 (above) addresses the impacts on the Cenotaph within the confines of my expertise.
28	Business Events Tasmania (Emma Ford)	- Economics - Tourism - Social and cultural impacts	- Strongly supports the stadium and the impact it will have on the business events market in Tasmania - Considers that business events are a key driver of Tasmanian tourism - Considers the stadium will also support the accommodation, hospitality, and retail economies in Tasmania	No matters are raised that are within my area of expertise
29	Jamie Wood	- Location - Environment (contamination, flood risk and water management, ground water) - Cost benefit analysis - Traffic - Noise - Adjacent uses and activities	- Supports Tasmania having a football team and stadium but does not support the location - Concerned about the environmental issues at the stadium and range of surrounding infrastructure projects to support the stadium (underground carpark, Northern access road, bus plaza, utility infrastructure, pedestrian infrastructure, landscaping and people movement) - Concerned about the cost of the stadium and the time it will take to pay off / cover the cost from the projected profits - Considered that the stadium project could address the existing and increasing traffic congestion in Hobart	My responses to Representations 2 and 3 (above) address the matters in this Representation within the confines of my expertise.

			▪ Suggests a light rail powered by magnets to accommodate congestion ▪ Suggests ferry terminals to be developed at the site ▪ Concerned about the form of public housing and prior plan for reconciliation park ▪ Concerned about contamination from former rail systems and gas works (including coal tar, ground water contamination, PFAS, heavy metal) ▪ Notes that "<i>The site needs to have this contamination of the site audited through a Contaminated Site Assessment audit by an Accredited Contaminated Land Site environmental Auditor. This is a requirement under the commonwealth NEPM for land contamination (and cannot be by passed) and State laws.</i>" ▪ Concerned about the dumping of excavated material including potentially contaminated material into regional landfill ▪ Identifies opportunities for a sustainable stadium (reusing storm water and integrated transport system) ▪ Concerned about noise and impacts on amenity of Federation Concert Hall ▪ Considers that "<i>proposed elements of the development such as the Antartica Facilities Zone and the Aboriginal Culturally Informed Zone appear to clash with the pedestrian movement issue.</i>" ▪ Suggests St Johns park as an alternative site.	
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