

Friends of Soldiers Memorial Avenue Inc.

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8 January 2024

Mr John Ramsay
Executive Commissioner
Tasmanian Planning Commission
GPO Box 1691
Hobart TAS 7001

By email: tpc@planning.tas.gov.au

Dear Mr Ramsay,

The Friends of Soldiers Memorial Avenue Inc (FOSMA) has existed since 2001. Our prime aim is to preserve and manage the Soldiers Memorial Avenue on the Queens Domain in perpetuity to honour the 536 men and one woman commemorated there. We have always sought to recognise the Hobart community's efforts to establish a lasting memorial and to acknowledge the ongoing impact that the Great War still has on Tasmanian society.

On occasion, FOSMA has taken an active role in ensuring that inappropriate development does not adversely impact on the SMA, or on the Queens Domain and, in particular, on other significant memorial places, such as the Cenotaph precinct. The SMA and the Cenotaph were always meant to be linked, both physically and spiritually. In fact, an extension to the main Soldiers Memorial Avenue was planted in the 1920s to connect the Cenotaph (constructed in 1925) to the Avenue, which had been planted in 1918-19. Two trees of that link remain. That is why we supported the construction of the Bridge of Remembrance.

The Cenotaph precinct and the Soldiers Memorial Avenue are both listed on the Tasmanian Heritage Register (THR ID 7137 and ID 11987) and as such are recognised as highly significant cultural heritage sites. Such listings are not made lightly. The whole reason the Cenotaph is where it is, is that it can be seen from all around Hobart and the Eastern Shore; a visual reminder of all that was sacrificed in the name of our nation, through so many conflicts. It stands above Sullivans Cove, where so many troops embarked. The Cenotaph site offers a magnificent setting for sunrise on Anzac Day, as well as offering a place of contemplation suitably located away from the city, but visible to all.

It is in this regard that FOSMA will take an active role in commenting on the proposed stadium at Macquarie Point and the assessment process for this project. FOSMA is very concerned that a stadium of the scale and bulk being envisaged will potentially have a significant adverse impact on the Cenotaph precinct, and by extension, the Avenue. It may also have a significant adverse impact on other heritage places adjacent to, and in the vicinity of the proposed stadium, as well as the important historic cultural landscapes that make up the port and city of Hobart .

We offer the following attached response on the Draft Guidelines on the Macquarie Point Multipurpose Stadium Project of State Significance, as issued by the Tasmanian Planning Commission in December 2023. However, we wish to make some general comments first.

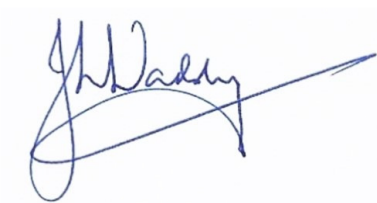
The timing and timeframe seeking public comments on these draft guidelines is considered to be very inappropriate and unfair to many Tasmanians who are very busy or away over the Christmas-New Year season. This smacks of a desire by the government and TPC to avoid public interaction and comment over the project. Proper planning practice should always seek to maximise public involvement during an appropriate consultation period, no matter the desire of the proponent (and their supporters) to speed matters up. At the very least there should have been eight weeks for submissions. We therefore expect that future consultation periods will be appropriately timed.

We also request that the Integrated Assessment for this project is produced and delivered in a proper, transparent and independent manner. This includes all reports and investigations and communications that are prepared for this assessment must be produced by appropriately qualified and experienced independent practitioners, free from government, proponent or Tasmanian State Service influence.

We note and support the request from Our Place that recommends all reports should be required to be prepared in accordance with expert witness practice notes such as apply in the Supreme Court of Tasmania, the Federal Court of Australia and TASCAT.

Please contact me if you require clarification or further information on 0417 487 289.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Wadsley', with a long, sweeping horizontal stroke extending to the right.

John Wadsley
PRESIDENT

Response to the Draft Guidelines for the Integrated Assessment of the Macquarie Point Multipurpose Stadium Project of State Significance (as issued by the TPC in December 2023)

Part I – Introduction

1.0 Introduction - The proponent is stated to be the Crown; surely there should be a more **specific identification of the agency/organisation that has responsibility for the project**, so that the public can clearly identify the proponent, and so that the proponent publishes clear lines of communication for the public.

Part II – Guidelines

1.1 Proposal - The project proposal must include a discussion and reasoning of the **assessment of all alternative sites** (including sites not considered) and why this location was chosen, including a ranking of all sites and how they were assessed against each other.

1.2 Site Description - Historic cultural heritage places and values, and Aboriginal cultural heritage places and values (as well as archaeological sites) must be included and considered under “Features and Context”

1.3 Proposed Use and Development - The 3D digital rendering of the project must include renders from Constitution Dock, Mawson’s Hut, Elizabeth St/Davey intersection, Princes Wharf, the Hobart GPO, the Cenotaph, the Bridge of Remembrance, Soldiers Memorial Avenue and from key vantage points on the Eastern Shore, including Rosny Hill, Victoria Esplanade and Kangaroo Bay.

1.4 Design and Management Response – This section should include a requirement for a **comparative analysis of similar sized projects** around Australia and even globally including how those projects responded to adjacent heritage places and cultural landscapes.

Under Clause 1.4.2, a **better definition of “adjacent area” needs to be made**. Given the bulk and height of the proposed stadium, the distance of 200m (as referenced in Clause 5.3.3) is considered totally inadequate. This should be increased to 400m. As mentioned earlier, the SMA and the Cenotaph are inextricably linked, both physically and spiritually. And the Queens Domain is also linked to the Cenotaph precinct, so impacts on the Cenotaph will also have an impact on the Domain.

2.2 Governmental policy and strategy – Clause 2.2.1 (3) must include a **reference to plans and strategies covering the Soldiers Memorial Avenue and the broader Queens Domain**. The City of Hobart has invested in several plans over recent years. FOSMA was actively involved in the preparation of the first management plan for the SMA in 2004, and subsequent plans and action plans since 2019. There are a plethora of plans and reports for various aspects of the Domain which are also relevant, including but not limited to the Queens Domain Master Plan 2013-2033 and reports for the City to Gardens Way project.

3.4 Social and Cultural Analysis Report – this section should specifically mention **potential impacts on the SMA** (not only the Cenotaph) from the perspective of commemoration and the community’s connection to and use of war memorials. We expect that FOSMA, Defence and veterans’ groups will be fully consulted by the proponent in this regard.

4.1 Landscape and visual values – “the spatial characteristics of the broader area” must specifically mention the Queens Domain and the Eastern Shore of the River Derwent. The term amphitheatre in the Glossary includes the Domain.

4.2 Urban form of Sullivans Cove – Clause 4.2.2 must include **plans for the Domain/Cenotaph precinct** as well as those for Macquarie Point. Clause 4.2.3 must specifically mention the need to address potential adverse impacts as well as potential contributions

5.3 Places and precincts of historic cultural heritage significance – Clause 5.3.1 must reference historic cultural heritage **values**, as well as characteristics and significance. It must also include the cultural landscapes and vistas as elements to be described.

Clause 5.3.2. must be more explicit in requiring that all adverse impacts and effects of the proposed stadium be clearly identified, described and quantified.

Clause 5.3.3 must be amended to include all places and precincts of historic cultural heritage significance as well as cultural landscape precincts and local historic landscape precincts within **400m of the title boundaries of the project site**. Given the bulk and height of the proposed stadium, the distance of 200m is considered totally inadequate. Also, there needs to be clarification of what “relevant to the site in relation to the Derwent River” means.

We note that the Tasmanian Heritage Council (THC) submission identified the following heritage places within and adjacent to the Macquarie Point Precinct plan:

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

FOSMA advises the **THC omitted the following heritage places** which may be impacted by the proposed stadium. Potential adverse impacts on these sites must be considered as part of the assessment process:

- Soldiers Memorial Ave, Boer War Memorial, and 2/40th Infantry Bn monument (THR ID 11987)
- Domain House (THR ID 2077) and Waterworth Building (THR ID 5869)
- Former Hobart Railway Station (THR ID 2187)
- Victoria Dock and Constitution Dock (THR ID 12022)
- Roberts & Co. Woolstore Complex (THR ID 2425)
- Hobart Gas Works complex (THR ID 2464)
- Tasmanian Museum and Art Gallery Complex (THR ID 6648)

Clause 5.3.4 must be amended to require that heritage impact assessments for the proposed stadium **address the following documents**, not merely “informed by”:

- The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance (2013) and Australia ICOMOS Practice Notes
- Tasmanian Heritage Council, Works Guidelines for Historic Heritage Places (2015),
- Tasmanian Heritage Council, Practice Note 1B Preparation of Heritage Impact Statements (2023)
- Queens Domain Cultural Heritage Management Plan (2002)
- City of Hobart/FOSMA planning documents for the Soldiers Memorial Avenue

The definition of 'historic cultural heritage significance' under the Draft Guidelines Glossary must be amended to align with the definition under section 16 of the *Historic Cultural Heritage Act 1995*, in addition to consideration of local heritage values.

We also support the Tasmanian Heritage Council submission seeking clarification as to how the heritage impact assessment will be integrated with the environmental, social, economic and community impacts assessment required by the Ministerial Direction, and what criteria the assessment will address.

6.3 Access: mass/public transport, car use and parking – In Clause 6.3.1, discussion on managing the provision and use of car parking in the broader area to achieve transport outcomes must be a whole of city approach, as this project will impact the whole of Hobart's transport networks. One point we make now is that the **Cenotaph precinct should NOT be viewed as a potential carpark for the Stadium**. Such a use would destroy the Cenotaph for ever.

7.0 Activity and land use – Clause 7.0.3 should include consideration of the current and future potential use of the Cenotaph area **and the Soldiers Memorial Avenue** for remembrance, commemorative or other activities.

9.1 Signs – this section should not only address signage, but also lighting and the colours to be used on building facades, infrastructure, light towers ancillary structures, etc. and the impact of signs/colours on adjacent sites, especially the Cenotaph precinct and nearby heritage places.

9.2 Construction Management – this section needs to **address the risks associated with construction activity** (demolition, drilling, explosives, heavy vehicle movement etc.) on nearby heritage places, especially the Cenotaph and the many heritage buildings on Evans Street and Hunter Street.

Glossary:

'Adjacent area' - this definition must be clarified as to its extent

'Cenotaph' – this definition must be amended to **specifically include the Soldiers Memorial Avenue**; as mentioned previously the two sites are linked, but also two trees from the 1920s Avenue Extension still survive adjacent to the Cenotaph.

'Historic cultural heritage significance' – **this definition must be amended** to align with the definition under section 16 of the *Historic Cultural Heritage Act 1995*, criteria as noted below, in addition to consideration of local heritage values:

- (a) the place is important to the course or pattern of Tasmania's history;*
- (b) the place possesses uncommon or rare aspects of Tasmania's history;*
- (c) the place has the potential to yield information that will contribute to an understanding of Tasmania's history;*
- (d) the place is important in demonstrating the principal characteristics of a class of place in Tasmania's history;*
- (e) the place is important in demonstrating a high degree of creative or technical achievement;*
- (f) the place has a strong or special association with a particular community or cultural group for social or spiritual reasons;*
- (g) the place has a special association with the life or works of a person, or group of persons, of importance in Tasmania's history;*
- (h) the place is important in exhibiting particular aesthetic characteristics.*