

TASMANIAN PLANNING COMMISSION



Our ref: DOC/24/145088
Officer: John Ramsay
Phone: 03 6165 6828
Email: tpc@planning.tas.gov.au

19 November 2024

Ms Anne Beach
Chief Executive Officer
Macquarie Point Development Corporation
GPO Box 251
HOBART TAS 7001

By email: anne@macpoint.com

Dear Ms Beach

Macquarie Point Multipurpose Stadium - Project of State Significance Request for Further Information

I refer to the reports that were prepared in response to the Commission's Guidelines on the Macquarie Point Multipurpose Stadium Project of State Significance (the project) and submitted to the Commission by the Macquarie Point Development Corporation (the Corporation) on 17 September 2024.

On this date, the Commission commenced its integrated assessment of the project. In accordance with the Ministerial Direction for the project, the Commission has 12 months to complete its assessment and report its recommendation to the Minister.

The Commission is proceeding with the integrated assessment in line with the processes outlined in its letter to you dated 22 February 2024, and the 'guidance on process, representations and hearings' document published on the Commission's website in July 2024.

The Commission has notified the Hobart City Council (the Council) and relevant agencies (which includes the Corporation in its capacities under the *Macquarie Point Development Corporation Act 2012*) and:

- has invited from them written submissions setting out their views on the project; and
- will consult with them in the preparation of the draft integrated assessment report (draft IAR).

The consultation with the Council and relevant agencies will continue over the next few months, and the Commission anticipates that the draft IAR will be completed in the first quarter of 2025.

The reports and submissions of the Corporation, as well as the information and advice the Council and relevant agencies provide, will be significant inputs to the draft IAR.

The Commission has reviewed the materials submitted by the Corporation.

The Commission appreciates that the time available for the Corporation to prepare reports and advice in response to the Guidelines is more constrained than the time that usually would be available for the preparation of documentation of a project of similar scale and complexity to the project. There are further challenges associated with preparation of materials, given the implications that arise from the project's central location in the CBD area of Hobart, that the site contains reclaimed land, and that the site is historically compromised as a result of past uses.

The assessment process established by the *State Policies and Projects Act 1993* (the Act), is a comprehensive assessment process for planning, and use and development, bearing in mind that the Act effectively sets aside all existing planning and use and development assessment rules, whether in Acts, regulations or planning schemes, in favour of the assessment process.

Acknowledging that, the Commission's advice and recommendations will be part of the Minister's and Parliament's consideration of the project. The Commission is concerned to ensure that its final report is based on the best available information presented to it during the course of the assessment process. That process will, it is anticipated, likely include public hearing(s) into representations made in respect of the draft IAR, as contemplated by s24 of the Act.

That stated, the Commission notes that while the Corporation's reports respond to many of the matters referred to in the Guidelines for the project, the review of the reports that has been undertaken so far indicates that they do not address all the matters on which information was sought under the Guidelines.

This letter is provided to outline a range of matters including:

- the scope and extent of the project that the Commission is assessing;
- further information that is sought in response to the Guidelines; and
- further detailed information that is sought for consideration by the Commission, in relation to the preparation of the draft IAR.

These matters are set out in the Appendix to this letter.

The matters detailed in the appendix should not be taken as the expression of any view of the merits of the project. Rather, as should be plain, the Commission seeks from the Corporation further information so that it may be properly informed in continuing its task.

The Commission appreciates that the Corporation might seek further particulars or clarification of some of the matters detailed in the appendix to better enable it to prepare a response. If so, could you please identify those matters in writing, and the Commission will either respond with further advice or arrange a meeting with its staff to provide further detail.

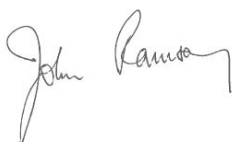
The Corporation may be of the view that the information provided in the reports, either meets the Guidelines, or represents the extent of any advice that the Corporation intends to provide to the assessment process at this time. If that is the case, the Commission would be pleased to receive your written advice in relation to those matters. The assessment will proceed in light of that advice.

Given the tight timeframe in which the Commission is to complete the integrated assessment and to report to the Minister, it is desirable that any further information to be provided, is provided as soon as practicable, noting that the assessment and consultation process is currently underway and will continue to progress.

Commission staff will be available to meet with you to discuss and assist with the matters raised in this letter and to obtain advice from the Corporation as to when additional information will be provided.

Finally, as you are aware sections 21 and 22 of the Act establishes a process by which the Commission is to engage with the City of Hobart and other relevant agencies in the assessment process. While the Commission is not seeking the Corporation's response to the section 21 submissions recently provided to the Commission, I alert you to the fact that those submissions have been posted on the Commission's website for information.

Yours sincerely

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

John Ramsay
Executive Commissioner

Appendix 1: Scope of project and requested further information

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Macquarie Point Multipurpose Stadium - Project of State Significance Request for Further Information

Appendix 1 - Scope of project and requested further information

A. Project to be assessed by Commission

The project that is to be assessed by the Commission, the land to which the project relates, and the plans and details of the project to be provided, are outlined in the Guidelines (see sections 1.1.1 and 1.3).

Specifically, the project and the corresponding land that is to be assessed by the Commission includes incidental or related use and development that incorporates services and infrastructure that is necessary for stadium to operate as proposed. This includes:

- roads or access ways used by vehicles, pedestrians and cyclists moving between the stadium building and the broader network, including the northern access road;
- land and infrastructure associated with pedestrian/cycle pathways or standing areas;
- landscaped and developed areas that will be utilised as part of the stadium operation including land and routes used for emergency evacuation and assembly;
- areas of land that will be disturbed, remediated, or landscaped as part of the project;
- land and infrastructure for public/event/private transport;
- works or structures on existing road, pedestrian, cycle or public transport assets to cater for pedestrians, cyclists, altered traffic arrangements, public/event/private transport; and
- the diversion of existing or the provision of new or augmented utility services.

The project site identified in the reports is inconsistent and does not align with the description of 'project site' in the Guidelines, which includes land related to associated use and development, as follows:

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.

The plans for the project are not provided as a consolidated set of plans with detailed description of the use and development that will form the basis of the Commission's assessment. The plans are dispersed through various unrelated reports. A greater number and variety of plans is sought.

Proposed uses and activities, hours of operation and capacity for each use, and maximum number/types/times of events for which approval is sought should be described in greater detail.

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Plans provided present a concept design rather than the Guidelines request for plans to be resolved to a 'detailed design stage, where constructability, structural engineering and significant building code compliance issues have been adequately resolved and will not alter the proposed development'. Provision of those detailed plans will assist.

Greater detail is sought on the design of the stadium itself (including its architectural details and finishes) as well as the site layout, subdivision, access, cut and fill, signage, utilities infrastructure upgrades, urban design details and landscaping details.

B. Content of the Reports in response to the Guidelines

The following outlines a range of matters where additional information is sought to provide a more comprehensive response to the Guidelines.

Policy, strategy and legislative context

- Further information, analysis and/or evidence on core strategic planning matters, as follows:
 - whether and how the site and area is capable of accommodating the traffic, transport and pedestrian access needs, and the provision of actual strategies that provide evidence that demonstrate that these matters are proposed to be addressed in an effective manner (section 6.0 of the Guidelines);
 - whether the use and development is compatible with the urban planning/urban design frameworks and strategies that have been established for Sullivans Cove and Hobart City, and to what degree any departure from the established framework is warranted, and if so, can be ameliorated (sections 2.2 and 4.2 of the Guidelines);
 - detailed consideration of the full economic societal costs and benefits of the project and whether providing for the use and development will be likely to facilitate economic development (section 3.0 of the Guidelines); and
 - overall, whether/how the project furthers the objectives of schedule 1 of the *State Policies and Projects Act 1993* and is in accordance with relevant *State Policies relating to use and development of coastal land, site contamination and water quality*¹ (section 2.1 of the Guidelines).

Economic development and social, cultural and community wellbeing

- The costs associated with the total capital investment in all infrastructure and services necessary for the stadium to operate as proposed in the three different forms of economic assessment (section 3.0 of the Guidelines).
- The Economic Impact Assessment and the Financial Impact Assessment should also assess the project in comparison to a base case/no project alternative in line with the general and specific requirements of sections 3.2, 3.3 and 3.5 of the Guidelines.

¹ These policies are outlined in Appendix D of the Guidelines.

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- Further detailed elaboration of the evidence base for some key assumptions related to both capital costs and revenue (section 3.1 and 3.5 of the Guidelines).
- A probability analysis of key assumptions and the sensitivity analysis undertaken should include a range of plausible scenarios (section 3.5 of the Guidelines).
- Information on the research undertaken that provided a means for community groups to express their views on social and cultural effects of the project (section 3.4 of the Guidelines).

- To fully consider the effects of the proposal on the landscape there is a need for a greater number, variety and level of detail of visualisations (section 4.1 of the Guidelines).
- Clarification of the elevation of the stadium shown in some photomontage based visual simulations which do not appear to correspond to the elevation of reference points in the view field.
- A broader either geographically or thematically analysis of landscape (for example, consideration of people's perception of place and the project's relationship with the River Derwent, consideration of the experience of residents of the city, and analysis of the impact of night lighting) (section 4.1 of the Guidelines).
- Further analysis of the effects of the proposal on the spatial and built form of Sullivans Cove including factual supporting evidence. The reports should document or consider relevant established Sullivans Cove planning principles, such as the principles of the Sullivans Cove Planning Review 1991 (Section 4.2 of the Guidelines).

- Further information and analysis of the effects of the project on Aboriginal cultural values and landscape, and evidence on consultation with the Aboriginal community (section 5.1 of the Guidelines).
- Further evidence/analysis on, and visualisations showing, specific effects of the project (including its use) on individual places of historic heritage cultural significance (section 5.3 of the Guidelines).
- Specific details/conservation management plans/guidelines relating to the dismantling and reconstruction/storage of the Goods Shed and Red Shed and advice on the resultant heritage values of these buildings (section 5.3 of the Guidelines).

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Movement

- Further information on both the supporting factual evidence and probability assessments related to assumptions on mode share, travel origins, pedestrian movement patterns, and parking demand including the assumptions and scenarios outlined in the Guidelines (section 6.0 of the guidelines).
- Where proposals/assumptions concern achieving outcomes related to mode share, pedestrian movement, use of on-street parking and congestion management generally, further information to demonstrate how these outcomes could be achieved (section 6.0 of the Guidelines).
- Further advice is required on how the stadium's operation relates to what appears to be unfunded and unscoped transport system improvements. In some places, the reports for the project appear to refer to specific locations of potential future transit corridor improvements while the reports do not refer to other potential projects such as a central city transit centre (section 6.0 of the Guidelines).
- The stadium project includes transport infrastructure and services that are considered necessary for its operation. Information is sought on actual proposals for the use and development, or cost estimates for elements of the project such as:
 - the event bus fleet and its operation;
 - pedestrian improvements catering for peak flows; and
 - access road development and infrastructure catering for public/mass transport,(section 6.0 of the Guidelines).

Activity and Land Use

- Further analysis and evidence would assist to understand the effects of proposed uses on existing uses in the vicinity of the project site and proposed management and programming regimes relating to the proposed uses and their effects on surrounding uses (including effects relating to traffic, parking, noise and pedestrian movement) (section 7.0 of the Guidelines).
- Further information and analysis would assist to understand how visitors and locals are likely to use the site outside major events, and on the relationship of the uses proposed as part of the project:
 - in relation to each other;
 - with future uses within the wider Macquarie Point Site; and
 - with allowable uses within the wider area more generally (section 7.0 of the Guidelines).
- Specific details of event management planning and integration with other activities (for example events in the surrounding area and operational activities of TasPorts) should be provided (section 7.0 of the guidelines).

Environmental quality and hazards

- Evidence or analysis should be provided on wind effects and pedestrian comfort levels associated with the proposed building design, or any measures to minimise or manage wind effects (section 8.1 of the Guidelines).

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- Further analysis on the extent and effects of overshadowing on occupants of other buildings and public open spaces (and its users) is sought (section 8.2 of the Guidelines).
 - Analysis of lighting should be based on a detailed lighting plan rather than concept level assumptions, and there should be consideration of effects to the behaviour of fauna species such as birds (section 8.3 of the Guidelines).
 - Further analysis of tolerable risks to be considered at a detailed design stage, and detail of mitigating solutions, in relation to hazards is sought.
 - Reports relating to noise should consider noise levels at all levels of multistorey buildings and include an analysis of whether receivers on the Eastern Shore should be considered in the assessment (section 8.4 of the Guidelines).

Environmental management and pollution control

- Many of the supporting reports refer to an earlier master plan for Macquarie Point that did not include the proposed stadium and which had a substantially different site development configuration. Consequently, many of the supporting reports are either at a preliminary stage where the Guidelines have not been addressed or are not adequate as they refer to a different project.
- Estimates of material excavation do not appear to be based on the current proposal and an assessment should be undertaken on the time and operational impact of stockpiling and assessing excavated material or the capacity of local landfill depots to receive materials (sections 8.6 and 8.7 of the Guidelines).
- Further assessment of risks and potential impacts to the environment from the project's construction and operation interacting with groundwater is sought. The outcome of this assessment should be translated into suitable environmental management strategies. (sections 8.5 and 8.7 of the Guidelines).
- Stormwater management reports should assess known risks such as the potential for 'liquid emissions' to enter stormwater, and include proposed strategies to achieve a suitable level of compliance with water quality objectives (section 8.5 of the Guidelines).
- A Contaminated Land Auditor should provide an assessment on the site suitability of the proposed development so it can be ascertained whether the proposed use and development can be implemented in manner that protects human health and the environment (section 8.7 of the Guidelines).

Other planning matters

- A detailed construction environment management plan, specific to the project, should be provided (section 9.2 of the Guidelines).
- Further analysis of the effects of emergency evacuation procedures and management of people movement on the transport and traffic flow function of the major road network is sought (section 9.4 of the Guidelines).
- Information on signage should provide details of actual locations, dimensions or treatments rather than concept stage advice (section 9.1 of the Guidelines).

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C. Specific Information to assist the Commission's assessment

The Commission seeks or seeks further information on the matters detailed below.

Proposed use and development

- A single consolidated and internally consistent set of architectural and landscape drawings that describe the project in detail (including all the elements referenced under part A above) and include visualisations.
- Greater resolution of the architectural, urban and landscape design solutions and commensurate detail in the drawings, consistent with normal practice for State significant development projects in Australia.
- A site plan of the full project site (including all 'incidental or related use and development', as described under part A above.
- A plan of subdivision.
- A site and floor plan of the full site with accompanying statement showing clearly and explicitly:
 - what is included in the cost plan relied on;
 - what is not included;
 - how the latter is proposed be delivered (staging in relation to the costed works); and
 - how it is proposed to be funded
 - proposed staging, timeframes and interdependencies of key elements, and including critical path sequencing for such works.

This should include Enabling Works, Early Works and Main Works as described in the Construction Management Plan (Appendix AA)

- A statement from the structural engineers stating their level of confidence that the roof structure and associated heights, form and detail is achievable.
- Key reports that are referred to but not provided (for example, the Emergency Management Plan that is related to critical incidents and public safety).
- Accommodation schedules, Gross Floor Area (GFA) and Net Lettable Area (NLA) schedules associated with each proposed use, including details of commercial tenancies.
- Contingencies (plans and costs) for key risks (for example, if extent of soil contamination is greater than anticipated - remediation, program, cost and time contingencies).
- A concept servicing plan for water and sewer services and diversions.

Visualisations

- Visualisations (in accordance with professionally developed and accepted guidelines) and elevation plans/sections showing the impact and effect of the proposal on each identified place and precinct of historic cultural heritage significance, from a range of relevant locations, as indicated in section 5.3.5 of the Guidelines.
- A comprehensive set of visualisations (in accordance with professionally developed and accepted guidelines) and elevation plans/sections showing the effects of the proposal on the landscape and townscape character of the project site and broader area and specific static and sequential views into and

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out of the site, responding to each of the specific matters in section 4.1 of the Guidelines.

- Visualisations are to include the visual experience from residential suburbs on both the western and eastern shore, and people's visual and spatial experience of the project based on evidence of where pedestrians move and spend time in the broader area around the project site and the city.
- All visualisations and elevations provided in the reports are to include the location and area of the stadium name sign.
- The accuracy of photomontages is to be verified through the provision of suitable information including the location and elevation of the camera viewpoint, identified reference points within the field of view and for the model of the stadium.

Economic matters

- The Guidelines for the project outline the basis of assessment method and information that will enable the Commission to assess, through comparison, the effect of the "with-the-stadium" and "without-the-stadium" scenarios for Tasmania. To assist the Commission with its assessment of economic matters the following information is requested.

Capital Cost Estimates

- The estimates and projections used in the economic and financial reports are to be based on the full capital costs required for the full operation of the stadium to realise stated benefits. Specifically, these costs are to include the cost associated with the provision or development of services and infrastructure that are necessary for the project to operate². The basis for doing this is outlined Infrastructure Australia Guide to Economic Appraisal 2021, including on page 26.
- The reports are to provide and be based on the best estimate of this total capital cost at the present time, broken into the key components with year-by-year total capital cost estimates, and for these estimates to be used consistently through the proponent's economic and financial models.

Sensitivity Analyses

- The information provided in each of the economic and financial reports, is to be consistently applied to "base", "optimistic" and "pessimistic" cases, based on plausible variations in estimates and assumptions, given the early-stage base estimates for capital and other inputs presented in the submission.
- Numbers for costs and revenue / benefits are to be used consistently, through the economic and financial reports. For example, the estimated full cost including the required supporting works (but not after subtracting the undefined "value-management" activities), impacted by for example a 20 per cent variation in total capital cost – whether through construction delay or initial "underestimation" in the planning process. A "delay scenario" should

² Including, for instance, the northern access road.

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take into account the penalties that State would face under the agreement with the AFL.

Financial Impact Assessment

- The Financial Impact Assessment is to be revised so that it can provide information on the likely impact on the State's finances of building and operating the stadium.
- Specifically the reports are to:
 - remove non-incremental revenue – (ie the revenue earned by other stadia or venues;
 - include debt-servicing costs (noting that under the limited-scope capital cost provided in the proponent's submission, the State is required to borrow \$375 million as its initial contribution and there is a further \$145 million to be funded); and
 - include the cumulative impact on future deficits and debt services costs of the State borrowing to fund all capital works and all ongoing operational deficits.

For each scenario:

- the revised modelling of debt servicing is to reflect the difference between the full capital cost estimates and the known external funding contributions (ie from the Commonwealth and the AFL); and
- modelling is to remove non-incremental revenue (from activities that already exist as identified in the report) where this accrues to stadia and venues already owned, operated or otherwise controlled by the State.

Estimates of benefits

- The base assumptions for level of interstate visitors and nights stayed by visitors is to be revised to show actual assumptions, that is:
 - average assumed % of total interstate visitors 25%;
 - average assumed % of additional interstate visitors 18% (72% of total); and
 - average assumed night stayed for each additional interstate visitor 4.3.
- As part of the provision of base, optimistic and pessimistic cases the following alternative assumptions are to be modelled:
 - average assumed % of total inter-state visitors 20% (rather than 25%);
 - average assumed % of additional inter-state visitors 14.5% (rather than 18%);
 - average assumed night stayed for each additional interstate visitor 3.1 (rather than 4.3);
 - 20% reduction in the assumed number of Tasmanians avoiding interstate travel; and
 - 20% reduction in the assumed nights stayed for Tasmanians avoiding interstate travel.
- Information and data is to be provided that provides the basis of base and optimistic cases for:

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- the planned capacity and assumed utilization of the stadium and how this relates to the capacity and attendance of stadiums in Tasmanian and relevant comparably sized stadiums in other states; and
- attendance level for AFL games and how this relates to attendance of AFL games currently in Tasmania (which would be projected in the 'without-stadium' scenarios).

Strategic planning/urban design

- An independent professional report accurately detailing relevant principles and mapped concepts of the existing Sullivans Cove Planning Review 1991 and objectively stating the degree to which the project (including its built form, massing, bulk, scale, alignment, orientation, detail and landscaping) complies with or is at odds with these principles/concepts, as indicated in section 4.2 of the Guidelines.

Movement

Transport / mode share scenarios

- Further information to describe the expected / preferred and travel patterns and behaviour for residents in southern Tasmanian. The reports should detail the changes that are required, in terms of time, cost, flexibility and convenience, that are needed to alter a P50 / expected travel behaviour to the planned mode share.
- Transport scenarios presented should include:
 - a high level of event patron demand for social activities in the Hobart CDB / waterfront for periods both prior to and following events at the stadium;
 - an equal use of the stadium for the southern Tasmanian residents within a 90 minute drive of the CBD;
 - a high proportion/P10 use of private cars to travel to the stadium/locality/area; and
 - a low level of use by interstate visitors.

Parking

- Maps and information on the potential / current availability of carparking (on-street, formal and multi storey) within a 30 minute walking distance to the stadium.
- Actions the proponent is proposing to take to provide or restrict the use of new or existing car parking are to be outlined. Where these actions relate to responsibilities of other authorities, identify the outcomes and the extent of any agreement with those authorities.

Pedestrian Movement

- Peak pedestrian movement scenarios are to include a high level of event patron demand for social activities in the Hobart waterfront / CBD locality prior to and following an event.
- A specific pedestrian movement scenario based on a high level of movement to events at the Princes Wharf/Salamanca Place locality following an event at the stadium should be given.

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- The reports are to present maps that show the routes and volumes associated with pedestrians having safe, visible, amenable, direct and convenient access to and from the stadium.
- The reports are to provide details and plans of the infrastructure, routes and queuing areas associated with pedestrians having safe, visible, amenable, direct and convenient access to and from the stadium under a range of likely peak pedestrian movement scenarios.

Emergency Management

- The reports are to provide details and plans of the volumes of people, routes and spaces within the stadium, the site and external to the site that enable safe and orderly emergency evacuation to safe areas and / or assembly areas for spectators / staff.
- Evacuation plans are to:
 - consider a range of scenarios and the assumptions on timeframes and volumes for evacuation and assume a high level of traffic on surrounding roads. The assumptions for these scenarios are to be explicitly stated.
 - be informed by simulation modelling of pedestrian movement patterns.

Mass Transport Services

- The reports should provide a strategy for the delivery of proposed event bus service that details the routes, frequency and duration of bus services, cost to users and total user travel times.
- Plans of infrastructure required to operate the proposed event bus service at the Stadium / CBD pick up drop off location including bus and passenger queuing and boarding information is to be provided.

Transport Infrastructure

- Plans for new or altered infrastructure associated with:
 - the northern access road,
 - use of event bus and ride share vehicles
 - pedestrian and cycle routesas part of the overall development plans for the site.
- The project description to include a detailed description of the transport infrastructure and services necessary for the stadium to operate as proposed and to realise stated benefits and how this relates to the operation of land uses and infrastructure that exist or are proposed in the locality.

Environmental Management and Pollution Control

Ground Water

- A Construction Environmental Management Plan (CEMP) is sought that reflects strategies for groundwater that are based on technical inputs including estimated inflows rates, values and quality, to demonstrate their suitability and practicality of proposed strategies.

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- A Groundwater Impact Assessment report is sought that documents potential risks and impacts related to groundwater during the construction and operation of the project, including:
 - the potential interaction between groundwater, surface water features and any proposed stormwater management for the project;
 - volumes, quality, inflow rates and potential treatment and storage of groundwater requiring extraction during the construction and operation of the project; and
 - impact to sensitive receptors or receiving environments, including environmental values and water bodies, and surrounding infrastructure due to changes in groundwater levels and water quality associated with the construction and operation of the project, such as:
 - changes to water quality associated with transportation of onsite and offsite contaminants
 - exposure of potential acid sulfate / acid sulfate soils (PASS/ASS) and/or saltwater intrusion
 - discharge of poor-quality groundwater to receiving environments
 - settlement resulting from drained soils (including at onsite and offsite infrastructure)
 - groundwater fluctuations related to buried segments of Hobart Rivulet.

Solid Waste and Hazardous Material Management

- Estimated volumes and weight of excavated materials, including the carpark construction.
- Details of how the management of potentially contaminated soil and all types of confirmed contaminated soil (Level 2, 3 and 4) impacts the constructability, programming and management of the project.
- Information on where materials are proposed to be disposed of, the capacity of proposed landfill destinations to accommodate proposed volumes and any logistical or financial requirements for additional landfill infrastructure.

Site Suitability Assessment

- Information that shows what use and development proposal existing site suitability statements relate to.
- Information that addresses gaps that are identified within the Site Remediation Strategy, as well as in relation to the full scope of the site as assessed by the Commission.
- New or updated site suitability statements from an Environmental Auditor that relate to the proposed use and development.

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D. Unintentional Errors Additional Information

- ‘Building elevations – east and west’ (MPS-COX-DR-01-A30-0000) and ‘site plan proposed’ (MPS-COX-DR-01-A11-2000) are missing from the primary set of plans.
- one of the plans provided is not identified in the drawing list (‘General arrangement northern car park’ - MPS-COX-DR-01-A20-0100).
- The North South elevation plans do not scale at 1:400 as stated.
- The summary report (7.2 on page 150) repeats the shadow diagrams for the summer solstice for all of the seasons (winter solstice, spring equinox and summer solstice).
- Figure 14 on page 41 of the Heritage Impact Assessment (Appendix L) does not include on the plan the number notations that are referenced in the caption.