

Draft Guidelines

Macquarie Point Multipurpose Stadium

Project of State Significance

City of Hobart Submission

January 2024

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04 January 2024

Tasmanian Planning Commission

GPO Box 1691

Hobart TAS 7001

Submitted via email: tpc@planning.tas.gov.au

RE: City of Hobart Draft Guidelines Submission – Macquarie Point Multipurpose Stadium Project of State Significance

Thank you for the opportunity to provide a submission on the Draft Guidelines for the Macquarie Point Multipurpose Stadium Project of State Significance, released on 4 December 2023.

It is acknowledged that the Tasmanian Planning Commission ('the Commission') is seeking comment on the Draft Guidelines, as the first stage of an integrated assessment of the Macquarie Point Multipurpose Stadium project in accordance with the *State Policies and Projects Act 1993*.

Accordingly, Council provides the following feedback on the Draft Guidelines as follows.

General comments

Council questions the underlying premise that the draft Guidelines are subject to discretion and lack the statutory weight of a planning scheme provision to direct a particular development outcome in the public interest. While Council appreciates that the draft Guidelines need to be sufficiently broad ranging to encompass the myriad complexities of such a project, it remains uncertain as to which particular guidelines will be obligatory for the proponent to meet.

Council submits that the Draft Guidelines would benefit from an additional requirement being included for the proponent to submit an Architectural Statement/Urban Design Statement/Landscaping Statement to demonstrate the process, decisions and rationale in developing the final design.

Similarly, to ensure the development is an exemplar of Tasmanian architecture, urban design and/or construction, it is suggested that a requirement is included in the final Guidelines document for the proposal to demonstrate how the Stadium may add to the knowledge base of Architecture, Structural Engineering or Construction techniques, in particular those which have a distinctly Tasmanian angle such as new construction techniques utilising local materials.

Part I – Introduction

2.0 Background

Council notes that as part of the integrated assessment process, 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 as defined in the *Macquarie Point Development Corporation Act*



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2012 ('the Act'). To this end, Council argues that the wording of the Draft Guidelines could be enhanced by the emphasis being placed on requiring that the proposal *ensures* that the site delivers 'sustainable social and economic benefits to Hobart' rather than the proposal '*could generate social, economic, and cultural benefits to the region and the State of Tasmania.*'

While Council acknowledges that the draft Guidelines are not intended to be overly prescriptive and are merely advisory, it is important that core elements of the Act are reflected through the integrated assessment in the wording of the final Guidelines.

Part II – Guidelines

1.3 Proposed Use and Development

Use

Council suggests that one of the central components of the assessment of the use of the Stadium should be how the development is proposed to be used in 'non-event' mode and is therefore activated for the remaining days of the year, outside of major events. It would be remiss of the Commission not to consider and comprehensively appraise the use of the Stadium all year round and to analyse how the Stadium could play a significant role in the urban renewal of the broader Macquarie Point precinct for the benefit of the whole community.

Development

Council contends that the requirement for the submission of 'a 3D digital rendering of the proposed project in context' is too ambiguous and open to the production of 'from the air' and 'hero' images. Moreover, the use of wide-angle camera renders which will reduce the height of buildings give a false reflection of what the human eye would actually see from street level. In order to enable an objective assessment of the visual impacts of the proposal that will give greater certainty to the community regarding the ultimate development outcome, it is recommended that the requirement is reworded as follows:

- *photomontages from eye level using a standard 50mm lens view - not wide angle, telephoto or use of collage, showing the proposed development from specific agreed locations,*
- *photomontages should reflect various times of day and seasons – not only at the height of summer,*
- *3D visualisations for all major approaches, open space within the precinct and from key proposed facilities/buildings, including the stadium at both eye level and from an oblique aerial perspective, and*
- *A 3D model should be provided to the City of Hobart and other interested parties to analyse and communicate the proposed development outcome in a format compatible with Council's digital twin and K2Vi model.*

Transport

With regard to the requirement for 'plans of any proposed vehicular and pedestrian access' as per the third point under this heading, Council suggests that accessibility be included as an essential requirement so that the development meets Disability Discrimination Act (DDA) standards.



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It is also suggested that new transport infrastructure should consider other forms of micro mobility beyond cycling as these modes can have different requirements in terms of parking and lane design.

With respect to the primary road access to the site, Council has concerns around the suitability of a northern access point with this location preferred to be used for more restricted or secondary access. Council urges the Commission to consider all road design options available in order to achieve an appropriate outcome that optimises access for all forms of transport with primacy given to the more accessible southern aspect of the site.

1.4 Design and management response

1.4.3

With regard to the guidelines for an examination of views to and from the project site '*paying particular regard to views to - kunanyi/Mount Wellington and the Wellington Range from public spaces...within the Cove Floor*', Council offers the following advice.

It is recommended that this requirement be broadened to include views *through* the site and extended to a wider area than just the Cove Floor. This would include views to and from the Cenotaph from Macquarie Street, views from The Domain and views from the eastern shore.

More importantly, this assessment should be undertaken in the form of a Visual Impact Assessment, prepared by a suitably qualified practitioner, using accepted and adopted methodology such as the widely used NSW *Guideline for landscape character and visual impact assessment* which utilises the well-recognised Sensitivity/Magnitude matrix.

Council suggests that with regard to the second dot point under this heading, ground conditions and microclimate be dealt with as two separate topics as the two are very different matters that require different expertise. It is also recommended that the issues of wind and solar should be addressed under microclimatic considerations.

3.0 Economic development and social, cultural and community wellbeing

3.1 Cost Benefit Analysis (CBA)

It is recommended that the draft Guidelines statement that '*The CBA should identify and quantify to the fullest extent possible, all significant benefits and costs over the life of the project, discounted to current values*' be amended to reflect the following advice.

Council notes that this section does not indicate what the expected life of the project would be. Generally, modern stadia have a 30-year lifespan after which they are substantially refurbished or demolished and rebuilt. The intended life span of the Stadium should be stated and quantified to ensure a robust and transparent approach is applied to analysing the costs and benefits of the proposal.

In addition, Council contends that the statement that '*If there are significant costs or benefits that are not able to be easily quantified, notional but plausible values should be used*' be extended to require demonstration of how this notional value was arrived at, using suitable and applicable examples.



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4.0 Landscape and Urban form

4.1 Landscape and visual values

Council contends that the assessment of landscape 'in its broadest sense' should also make explicit the original course and post-colonial piped course of the Hobart Rivulet and the reclaimed land on which the site sits. It is thus recommended that this section consider the reclaimed shoreline and Hobart Rivulet as waterways, altered ecosystems and human settlement patterns.

6.0 Movement

6.1 Travel scenarios and management options

Council proposes that this section could benefit from the addition of a requirement to provide pedestrian modelling which has become a common practice when designing stadiums and their surrounds to ensure sufficient and safe capacity is provided for different types and sizes of events including evacuation scenarios. It is thus recommended that a requirement be included for pedestrian modelling to ensure the stadium, and its surrounds, are designed to accommodate its foreseeable demand usage and patterns.

Council would also encourage the Commission to have proper regard to the United Nations *Convention on the Rights of Persons with Disabilities (CRPD)* when determining the relevant requirements for accessibility.

6.4 Pedestrian/Cycling movement

This section appears to be premised on a requirement to identify and mitigate potential conflicts during peak use and event mode scenarios. This approach does not allow for a more holistic appraisal to be undertaken to ensure appropriate facilities are provided to encourage greater use of these sustainable transport modes. To this end, Council recommends that the stated aim of this section should be to design improvements within the intended infrastructure to promote and improve pedestrian and cycle movement through the site to potential and existing connections. This should include information on end of journey facilities within the Stadium itself.

8.0 Environmental quality and hazards

To respond to the global climate and biodiversity emergency for current and future generations, the City of Hobart is committed to leading on climate change by moving toward a zero emissions and climate-resilient future with our community. Any development should aim to support the City of Hobart's goal of moving toward a zero emissions and climate resilient city.

Section 8.0 of the Draft Guidelines appears to overlook requirements for environmental and sustainability excellence in keeping with Council's targets to reduce local greenhouse gas emissions. Council recommends ensuring consistency with the sustainability themes and principles set out in the Mac Point Precinct Plan and ensure adherence to the United Nations Sustainability Development Goals.

Furthermore, a climate risk and vulnerability assessment should be undertaken to adequately plan and prepare for extreme weather events, sea level rise and other climate-related shocks.



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8.1 Wind effects

This section appears to focus solely on the wind conditions that new buildings create while omitting the appropriate emphasis on the existing conditions that provide a benchmark and base scenario.

It is recommended that a report be submitted on wind that incorporates considerations of the prevailing winds, wind chill effects (including breezes during hotter periods) and suggested design and operational improvements to ameliorate the worst impacts.

8.2 Overshadowing

Council submits that additional reporting in this section would be beneficial to assess the potential impact on the landscape in the proposed open spaces and/or how the landscaping would need to adapt to the different solar access scenarios.

Therefore, the reports required in this section could be expanded to include:

- open space overshadowing and consideration of the potential impact on any proposed vegetation and how the vegetation, in turn, can help address any potential heat island effect impacts in any areas with significant solar access; and
- the total sun hours at key times of the year (e.g. the equinoxes and solstices), solar exposure levels and the impact on thermal comfort for people.

8.3 Light

Council advises that this section focuses mainly on light spill which is only one aspect of the positive and negative impacts of lighting design. It is recommended that when developing future lighting requirements, the following aspects require due regard:

- the need for safety,
- wayfinding,
- CPTED,
- minimising energy use,
- facilitating Dark Skies,
- creative lighting to highlight buildings and spaces.

Council notes that a major omission of the draft Guidelines is a dedicated section focusing on sustainability. It is recommended that a new section be included under the Environment heading that includes the following requirements:

- Reuse of materials/waste
- Embedded energy and life cycle of the proposed materials
- Use/specification of Green Star and NABERS, LEEDS or similar green ratings
- Minimisation of import of soil to the site
- Circular economy strategies / local sourcing, where possible
- On-site energy generation and storage
- Waste reduction and reuse (i.e. precinct energy and waste management)
- Living architecture.



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9.0 Other planning matters

Council submits that this section could benefit from a new section focused on Open Space as this topic is dealt with in a fragmented manner throughout the draft Guidelines. It is recommended that a report be submitted on Open Space as a major contributor to the future success of this project that could include the following aspects:

- Open space and Landscape objectives, and approach
- Types and uses of proposed spaces
- Drawings and 3D visualisations
- Street trees and urban heat island effect minimisation
- Weather protection
- 3rd generation CPTED principles

Some particular considerations that should be addressed in this report are:

- Open space that demonstrates how it has a robust, flexible and adaptable approach to climate change,
- Open space that responds to the port and Cove floor settings in terms of materiality, relationship with the waterfront concrete apron, functionality for the Port and other functions (e.g. tourism, cruise ships, etc.),
- Is the open space ready, safe and high amenity for events in terms of capacity, robustness and functionality.

9.3 Utility Services

Council notes that there is no mention of telecommunications, which have become a major infrastructure consideration over the last few decades (e.g. mobile phone networks at stadiums can be overloaded due to the density of patronage). In addition, there is no mention of strategies to efficiently share infrastructure to support utilities such as shared larger diameter pipes.

It is suggested that this section could benefit from mentioning telecommunications as a utility, including their upgrade, as this utility is fundamental to the operation and success of a stadium precinct.

Lastly, Council commends the Commission for allowing an open public comment review period on the draft guidelines to ensure the most robust, transparent and meticulous approach is applied to the assessment of this project of State Significance.

Thank you again for the opportunity for Council to provide advice on the Commission's assessment of this significant development proposal for the City of Hobart. If you would like to discuss any of the matters raised in further detail, please do not hesitate to contact Jen Lawley on (03) 6238 2496.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Neil Noye'.

Neil Noye

ACTING CHIEF EXECUTIVE OFFICER