

(DRAFT)

Date

John Ramsay
Executive Commissioner
Tasmanian Planning Commission
Level 3, 144 Macquarie Street
Hobart Tasmania
tpc@planning.tas.gov.au

Dear John,

**MACQUARIE POINT MULTIPURPOSE STADIUM PROJECT OF STATE SIGNIFICANCE
(PoSS) - Draft Integrated Assessment Report (IAR)**

Thank you for the opportunity to make this submission in response to the Draft IAR that was released on 30 March 2025.

General comments

The purpose of this submission is to articulate the pertinent issues for the City of Hobart (City) with regard to the various roles it plays in this project. These roles are:

- the council of the municipality in which the Project is located;
- an 'Agency' (*planning authority*) as defined under the *State Projections and Polices Act 1993*;
- an asset owner of local roads, footpaths and carparks, stormwater and lighting infrastructure;
- an adjoining landowner to the Project of State Significance (PoSS) declared project area;
- as City Shaper, determining the future strategic land use planning agenda for the city;
- as the responsible Agency for enforcing a range of planning permit conditions; and
- as advocate representing a range of different community views on issues such as Aboriginal cultural values.

The City holds similar views in relation to many of the Panel's findings as outlined in the draft IAR, especially as they relate to the City's key areas of responsibility. However, the City has expressed these opinions previously in various submissions and meetings.

The submission therefore focuses on areas where a point of difference is apparent that may need further attention and resolution through the next stages of the PoSS process, if progressed, or where we can provide information or clarity on issues identified.

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1.0 Economic effects

The City concurs with the Panel's concerns around the ability of the State to finance the construction of the Project and the associated long-term economic impacts this may have at the State level. However, given the Project will be located within the Hobart LGA and adjacent to Hobart's CBD, Council engaged AEC Group Pty Ltd to undertake additional economic analysis to inform its decision-making as well as to highlight the potential economic, social, and cultural implications for Hobart specifically (see [Appendix A](#)). It is noted that the economic analysis undertaken to-date by the Macquarie Point Development Corporation has not focused on the local economic impacts, and this is viewed as a missed opportunity to understand the economic impacts of the chosen location of the Project.

While the City acknowledges that alternative developments have not been modelled and compared, a project of this magnitude, capable of hosting a multitude of events and conferences catering to diverse interests and interstate visitors, will undeniably have a transformative economic impact on the CBD and the broader LGA¹. This level of city-shaping influence was not previously anticipated for this site and is a marked departure from the existing urban-mixed use development plan set out in the Sullivans Cove Planning Scheme 1997.

Economic Impact on the City

The economic analysis undertaken by AEC Group explores the impacts the Project will have for the Hobart municipality, during both construction and operational phases. The modelling incorporates previous related studies and peer reviews, along with desktop research to inform the underlying assumptions and quantify the Project's economic impact on the Hobart LGA using input-output modelling.

Construction Phase

During the construction phase, it is estimated that construction activity will generate significant economic impacts within Hobart LGA, as shown in Table 1. Please note all values are expressed in 2024 dollar terms.

Table 1: Economic Activity Supported by Construction, Hobart LGA

Impact	Output (\$M)	GRP (\$M)	Incomes (\$M)	Employment (FTEs)
Initial Stimulus in Local Economy	\$52.4	\$20.3	\$16.3	123
Direct Requirements (First Round Type I) Impacts	\$41.8	\$18.6	\$13.0	116
Industry Support (Subsequent Round Type I) Impacts	\$17.3	\$8.4	\$5.9	49
Household Consumption (Type II) Impacts	\$31.9	\$18.0	\$9.4	97
Total Impacts in Local Economy	\$143.3	\$65.4	\$44.7	385

Note: Totals may not sum due to rounding.
Source: AEC.

Overall, the total impacts on the local economy amount to \$143.3 million in output, \$65.4 million to the Gross Regional Product (GRP), \$44.7 million in incomes, and support a total of 385 FTE jobs. These figures highlight the substantial economic benefits for Hobart LGA, including positive impacts on local output, gross regional product, incomes, and employment opportunities. As previously stated modeling for alternative developments of this site has not been conducted given the uncertainty of what form and use this may take,

¹ Macquarie Point Stadium Economic Impact Assessment, AEC Group, 2025

however, it is not unreasonable to conclude that a similar financial outcome during a construction phase of an alternative development scenario of mixed use could be achieved over a longer timeframe.

Operational Phase

Modelling of the operational phase impacts examines the average total annual economic activity supported through the operations of the Stadium, with operations assumed to reach a stable state of operating by 2032. The Project will generate economic activity for the Hobart LGA through the following mechanisms:

- Operating activity of the stadium itself
- Activity associated with organising and hosting events at the stadium
- Activity supported more broadly in Hobart LGA on event days outside the Stadium, before and after an event
- Induced non-event day visitation and associated visitor expenditure.

Table 2 highlights the annual economic impacts of the Stadium supported by 'steady state' operations. Of the post-construction impacts, the largest impact is estimated to be delivered through induced non-event day visitor expenditure, followed by local and visitor expenditure on event day (outside the venue).

Please note the scenario presented in Table 2 is modelled on the assumption that 50% of business-type events represent net new activity for the Hobart LGA economy. Please note all values are expressed in 2024 dollar terms.

Table 2: Economic Activity Supported during Post-Construction, Hobart LGA

Impact	Output (\$M)	GRP (\$M)	Incomes (\$M)	Employment (FTEs)
Stadium Operations				
Initial Stimulus in Local Economy	\$7.4	\$0.4	\$2.6	23
Direct Requirements (First Round Type I) Impacts	\$2.9	\$1.4	\$1.1	11
Industry Support (Subsequent Round Type I) Impacts	\$0.9	\$0.5	\$0.3	3
Household Consumption (Type II) Impacts	\$2.9	\$1.6	\$0.8	9
Total Impacts in Local Economy	\$14.0	\$3.9	\$4.9	45
Hosting Event Activity				
Initial Stimulus in Local Economy	\$4.5	\$2.2	\$1.8	31
Direct Requirements (First Round Type I) Impacts	\$1.4	\$0.7	\$0.5	4
Industry Support (Subsequent Round Type I) Impacts	\$0.4	\$0.2	\$0.1	1
Household Consumption (Type II) Impacts	\$1.6	\$0.9	\$0.5	5
Total Impacts in Local Economy	\$7.9	\$4.0	\$2.9	41
Local and Visitor Expenditure On Event Day (Outside The Venue)				
Initial Stimulus in Local Economy	\$40.0	\$26.4	\$15.2	237
Direct Requirements (First Round Type I) Impacts	\$9.0	\$5.8	\$3.0	25
Industry Support (Subsequent Round Type I) Impacts	\$2.7	\$1.8	\$0.9	7
Household Consumption (Type II) Impacts	\$15.2	\$11.4	\$4.5	46
Total Impacts in Local Economy	\$66.9	\$45.3	\$23.6	315
Induced Non-Event Day Visitor Expenditure				
Initial Stimulus in Local Economy	\$54.2	\$26.4	\$20.3	308

Direct Requirements (First Round Type I) Impacts	\$12.1	\$5.8	\$3.9	33
Industry Support (Subsequent Round Type I) Impacts	\$3.6	\$1.8	\$1.2	10
Household Consumption (Type II) Impacts	\$20.2	\$11.4	\$6.0	62
Total Impacts in Local Economy	\$90.1	\$45.3	\$31.4	412
Total Operations Phase				
Initial Stimulus in Local Economy	\$106.0	\$48.7	\$39.9	598
Direct Requirements (First Round Type I) Impacts	\$25.4	\$12.2	\$8.5	72
Industry Support (Subsequent Round Type I) Impacts	\$7.6	\$3.8	\$2.6	21
Household Consumption (Type II) Impacts	\$39.8	\$22.5	\$11.8	122
Total Impacts in Local Economy	\$178.9	\$87.2	\$62.8	813

Note: Totals may not sum due to rounding.
Source: AEC.

2.0 Social and community issues

Whilst the City acknowledges the Panel's findings regarding team establishment and community building, the Project can also achieve significant social and community benefits for Hobart and the wider region as established by AEC Group² (see [Appendix A](#)).

For example, the stadium is expected to support broader economic investment, urban renewal, local supply chains, workforce skills outcomes, and provide amenity benefits for local residents. Situated within walking distance of the city's entertainment and dining areas, the Stadium is likely to boost confidence in the CBD and encourage additional investment in entertainment and tourism infrastructure nearby.

The development of the Queensland Country Bank Stadium in Townsville, Queensland, resulted in the upgrade of surrounding areas with parks, walkways, and other public urban infrastructure. Additionally, a new hotel (Doubletree by Hilton) is slated to start construction within the Queensland Country Bank Stadium Precinct (AEC, 2021).

It is widely accepted that CBD renewal projects provide significant economic benefits through increased patronage and activity within their precincts. Numerous studies have estimated the increased economic activity driven by CBD renewal, highlighting additional business revenues and activity as key benefits (Ha and Grunwell, 2014; Essential Economics, 2014; New York City DoT, 2014; Yang et al., 2014).

A survey conducted on patrons of CommBank (formerly Bankwest) Stadium in Parramatta revealed that, on average, spending outside the stadium was higher than spending inside the stadium (Invest Parramatta, 2019).

The anticipated uplift in urban renewal is expected to support additional economic activity in the Hobart CBD and enhance the liveability and attractiveness of the City.

Population Retention and Increased Liveability in Hobart

Liveability is a crucial element in establishing the attractiveness of a region and a necessary component for both retaining the current population and attracting potential migrants. Liveability refers to the overall quality of life a geographic region can support,

² Macquarie Point Stadium Economic Impact Assessment, AEC Group, 2025

considering basic human services such as housing, healthcare, safety, and transport, as well as community-oriented services.

Access to both sport and culture is a key contributor to liveability, which the proposed Stadium is expected to provide. The Stadium will also enhance greater connectivity within the inner city, providing another reason to visit the CBD and its entertainment offerings. This is particularly important for Hobart LGA, with its population as of June 2023 (55,964 residents) still below its 2020 peak (ABS, 2024^d).

Raising the Profile of Hobart

The Stadium represents a significant improvement in sporting infrastructure in Hobart and Tasmania in general. Its focus on spectator experiences and unique structure, with the roof displaying Tasmanian timber, will help promote the Tasmania brand, reputation, and profile. For example, a survey of visitors found that 88% of respondents felt their experience inside Bankwest (Parramatta) Stadium positively influenced their perception of Parramatta (Invest Parramatta, 2019).

AFL is a highly popular sport in Australia, and the inclusion of the Tasmanian Devils in such a high-profile competition will advertise Hobart. The Stadium is expected to attract other major events, such as NRL fixtures, Socceroos and Matildas matches, capturing a new audience as televised games highlight the stadium and its location within the city. This has the potential to encourage greater tourism visitation and, potentially, resident and business attraction to Hobart. As a result, the broader perception of Hobart and Tasmania is likely to be raised by the development.

Economic Impacts pre and post events

The Macquarie Point Stadium is expected to boost patronage to nearby businesses before and after events. In this following section the City has outlined current offerings for locals and visitors and outlines strategies to enhance the activation of these areas to support Hobart LGA's economy pre and post event.

In the Hobart LGA, many of the businesses that could benefit from Stadium events are within walking distance. Figure 1. shows a map of Hobart's core night-time economy (which includes establishments that provide services mainly between 6pm and 6am, such as pubs, restaurants, and clubs) concentrations as of July 2024, all located close to the Stadium.

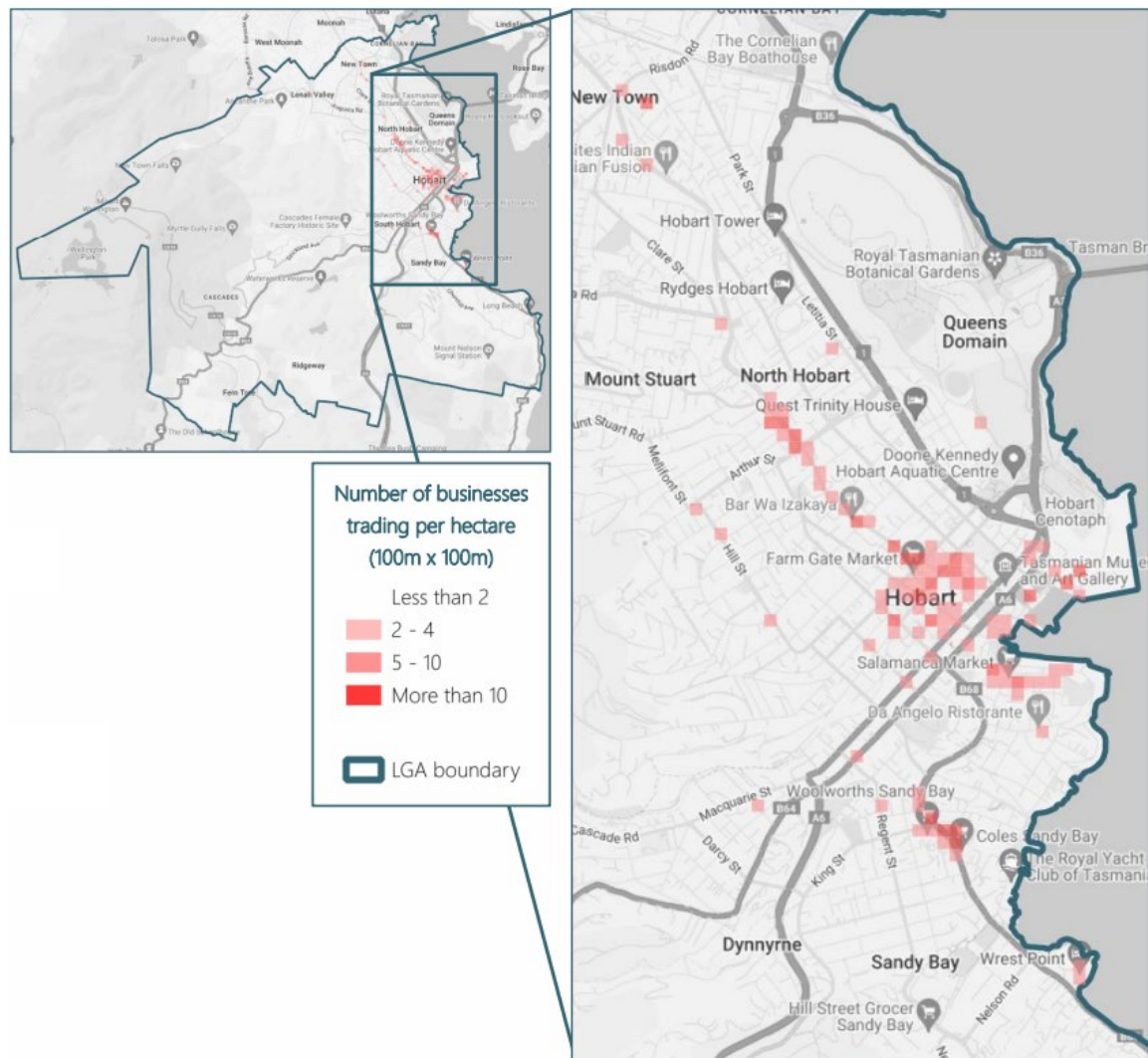


Figure 1: Core Night-time Economy, Retail, Hair and Beauty Business Concentrations, Hobart LGA, 2024. Source: Ingenium Research (2024).

Locals and visitors to the Stadium are expected to spend most of their time in these hotspots before and after events due to their close proximity, convenience, and the variety and scale of retail and commercial offerings compared to other Tasmanian regions.

Previous studies have shown that many patron transactions occur within Hobart, with more than half of businesses in Hobart LGA reporting an increase in activity on game days from locals and visitors attending games at Ninja Stadium (outside Hobart LGA). Anecdotal evidence suggests that the distance and limited retail and hospitality offerings outside Hobart LGA may restrict expenditure in those areas, particularly on event days.

Built heritage tourism in Hobart

The City notes that its remaining colonial built heritage townscape qualities are defining features of the City and are often a key consideration for people choosing to visit Hobart³.

³ Legislative Council (2016) *Final Report on Built Heritage Tourism in Tasmania*, Government Administration Committee B, Legislative Council, Parliament of Tasmania

The chosen site of the Stadium both represents a chance to increase the entertainment options for the inner City and weekend/nighttime economy diversification whilst potentially impacting negatively on the cherished colonial heritage townscape values.

The City recognises the dichotomy of this and stresses that the realisation of the surrounding precinct - that strives to consider, more comprehensively, the existing heritage setting - will be critical to avoid the wider Mac Point Precinct becoming a largely utilitarian service area for the generally inactive Stadium save for event days. Further concerns in relation to the Stadium's impact on the urban form of the City and its heritage values are set out in Section 3 and Section 4 of the submission.

3.0 Urban form planning

Summary

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. The City has prepared, in conjunction with Leigh Woolley and its Urban Design Advisory Panel (UDAP), further responses to the Panel's findings for Section 3 below.

3.1 Urban form of Sullivans Cove and Hobart City

Building alignment

(o) 'Evans Street is identified in the Planning Review as a street that should have buildings with active edges forming a street edge'... 'the stadium, which is free standing, would not align with the street... with active frontages... does not meet the intended building form in the area'.

It is important to remember that when the Planning Review was written the 'Railyards' at Macquarie Point were not addressed as part of the Cove Floor. Moreover the landform considerations that now differentiate the 'reclaimed' from the 'given' ground were not incorporated. Accordingly the Cove Wall (that incorporated the frontage of Hunter Street) did so based on its built form, not due to the fact that it was built over Hunter Island and the sand spit (as 'given' ground). In short, the Planning Review (1991) was 'built form' derived, not 'landform' derived.

As a result the buildings along Evans Street were not considered part of the Wall, even though logically they were built above the same 'ground' conditions as the Hunter Street frontage. This was an anomaly identified over a number of years and incorporated into subsequent analysis, including one of the documents included in the TPC Guidelines reference list (Woolley 2015, 2017).

When the further considerations of the Cove Floor were recognised as incorporating all that area that was reclaimed, and that buildings on the Cove Floor were to be free-standing, ('in the round') then the previous inconsistent notion (that the former Railyards / Macquarie Point edge of Evans Street should be a street frontage) was brought into question. Accordingly, the outcome by the Panel (p) (p.47) that Evans Street should '*still meet the general intent of the planning principles*' is somewhat open to review.

The important consideration is that typologically, this side of Evans Street should not be treated the same as the other side. The stadium side can accommodate buildings 'in the

round' rather than 'street' facing, ideally with active edges (see [Appendix 2](#)).

3.2 Landscape and visual effects

An essential condition to any permit would be for landscaping. Landscape is a core part of the design and reading of the building (see [Appendix 3](#)).

Appendix J Visual Impact Assessment outlines the importance of the public realm landscaping to the overall proposal, providing benefits and mitigating the stadium's visual impact, including:

- Assisting in mitigating the impacts of the stadium bulk and scale.
- Softening the built form of the stadium.
- Allowing the stadium to co-exist with the Engineering Building within the local viewshed.
- Reflecting the natural and cultural values of the site and its context.
- Moderating the built form and ground level materiality.
- Along the escarpment, reinforcing the historical vertical edge of the river in this location, retaining the topographic importance of the edge.
- Strengthening the visual edge, providing further separation between the Cenotaph and the Stadium.

There is also a concern about light pollution from the stadium at night. The light spill requires modelling once materiality has been finalised and there should be consideration of timing restrictions for use of the lights, along with an assessment of the impacts of the proposed illuminated signs. It is also important to see the visual impact of the key views at night.

There are some initiatives that would contribute to creating a human-scaled environment within the landscape design package for public realm improvements including playful elements, water features, detailed paving treatments and native plantings. It remains to be seen if these critical elements will, in fact, be delivered.

Context

Considering key relevant materials identified in the draft IAR under *3.1 Urban Form of Sullivans Cove and Hobart City* and *3.2 Landscape and Visual effects* sections. These documents include: the Sullivans Cove Planning Review (1991), the Hobart Waterfront Urban Design Framework (2004), Hobart 2010, Public Spaces and Public Life, (2010) The Building Height Standards Review (2018), and the Central Hobart Plan (2023).

Although the documents are chronological, they do not treat the landform of Sullivans Cove in the same way. This is important in seeking consistency of approach when reviewing the spatial context of the proposed stadium, especially having regard to current planning policy and expectations. Put simply it concerns the difference between considering the setting as a 'backcloth' (to the urban landscape of Sullivans Cove) and considering the 'landform as fundamental to urban structure'.

The 1991 Planning Review identified the serving as important, (Sullivans Cove was

contained within the 'great amphitheatre' 1991, p.26) but it did not translate this into an appreciation of the *landform* that had 'shaped' the built form of the cove. Rather it remained as landscape *backcloth* where the water was the 'stage' and the mountain 'the gods'. (1991 p.17). Accordingly, the principal spatial features were the 'Wall to the Cove' and the 'Cove Floor', being the visually dominant components of *built* structure.

This approach continued into the Hobart Waterfront Urban Design Framework of 2004. Here the grid of streets are identified as 'axes' in contrast to the Cove Floor, itself located beyond the defining edge of the Cove Wall. Similarly, the 2010 Study by Jan Gehl, implored the city to make the most of its remarkable setting, (2010 p.16, 76) but also did not differentiate the landform as fundamental generator / edge to the Cove Floor.

This is important because the former Railyards site (being part of the 'reclaimed floor' of the cove) was not yet being considered part of the (potentially) extended public space of the Cove Floor. Although earlier studies had differentiated the reclaimed edge of the Cove from the Cove Wall itself, (1987 Sullivans Cove Urban Detail Study, p. 20, 24), and this also informed studies of the City Centre, (1991 Townscape topic report, CASP, HCC, p.2.4, 3.2). It was not until the Height Standards - Performance Criteria Review (2016) and the ensuing scheme Amendment (PSA 17-3, 2018) that landform terminology and specific figures were incorporated into the scheme. These then informed the Building Height Standards Review (2018).

These now clearly identify the *reclaimed* edge of the Cove Floor (fig 22.7 HIPS 2015) (also identifying the 'basin'), as well as the topographic condition of the Central Hobart terrain forming the Urban Amphitheatre (figs. 22.8, 22.9 HIPS 2015) These, and the analysis embedded in the 2018 study, has helped reinforce and inform considerations of Central Hobart building heights being based on the (landform) location and their stepped character, back from the Cove Floor and in from the Domain headland (HIPS 2015) (Clause 22.1.3.1), (CHP 2023).

In short, the context for density and building height now acknowledges the terrain of Central Hobart and the Amphitheatre to the Cove, as inherent and identified components of urban structure, not simply as 'backcloth'. Hopefully this clarification helps reduce some of the anomalies that persist when considering the earlier listed documents, as well as the Proponent's Appendix GG (SDP).

3.3 Project Design

The City concurs broadly with the Panel's findings regarding the Project's design, and provides additional responses for consideration below.

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.

Stadium Design & Functionality

The stadium's design is well-documented, but there is a lack of clarity on its integration into the surrounding precinct. The reports do not sufficiently explain how the stadium will function on non-event days.

Public domain design along the eastern edge is unclear. The relationship between the stadium and adjacent mixed-use developments is not well-defined. The reports do not describe how the Stadium is part of an integrated Precinct. Computer renders omit other precinct buildings, and the public domain plan is silent on the interface with adjacent precinct buildings. Whilst we acknowledge the mixed-use developments along the eastern edge will be part of a separate application, the relation and design of the stadium and those buildings are integral to a success of the precinct. Hence the application should provide a concept for the ground plane and those buildings. There needs to be a 'proof of concept'.

No evidence has been provided as to why the project has been sited in this particular way; or alternative options been tested. It is assumed that given the geometry and size of the site along with the scale of the stadium, there is no alternative layout.

Visual Assessment Summary

The visual assessment summary confirms and acknowledges that *“the height of the Stadium extends above that of the built form in the surrounding visual context and it presents as a prominent element from most of the viewpoints outlined above.”* However, the response to the POSS guidelines suggests that the visual bulk of the stadium does not impact on the surrounding natural features. Several mentions are made to reference the semi-transparent materiality and shape of the dome reducing visual impact in its landscape setting, which in UDAP's opinion, cannot be relied upon given the material illustrative nature of the montaged views. It is also noted that only a location and general description has been provided for each view without specific details such as elevation, perspective or camera lens angles.

UDAP also questions the likely effect of glare and reflectivity of the roof dome materials within the contextual setting of views specifically from elevated locations (see [Appendix 3](#)).

3.4 Signage

The City agrees with the Panel that insufficient detail has been provided of the proposed signage to make a thorough determination of its quality, integration, design and potential visual impacts. While the signage report refers to good design practice in terms of wayfinding, insufficient information is provided showing how it is to be incorporated into the landscaping throughout the site.

The signage, naming and identifying of the stadium is considered to be an important element in the context of the sports facility. It has a key role in guiding visitors by identifying the main entrances whilst providing a focal point where the building addresses the road frontages. Although subject to further details, it is apparent that the proposed scale of the signage is proportionate to the size of the building with the potential to be well integrated into the design of the stadium. This approach has been extended to ancillary signage throughout the site.

The Panel states that “signs should be responsive to the context of the surrounding area, rather than the building they are attached to. Their design, fabric and colour scheme should respond to the surrounding environment and its spatial arrangement, rather than project out of it.” The signage is well setback within the site and proposed to be incorporated into the architecture of the building. Due to the proposed scale of the development, the broader site is considered to form the surrounding environment and context for signage.

The City does not see relevance in the Panel’s comparison of the horizontal length of the signage to the vertical height of buildings nearby or the naming signs having to accord with the scale and details of nearby heritage buildings. The stadium is significantly larger in scale than these buildings and signage is not viewed in the context of the heritage buildings but the stadium site itself. Although signage is tightly controlled throughout the city and Sullivans Cove, signage of significant scale already exists, but not located in the context of such a large site or comparable built form.

Under *25.13 Matters to be Considered* of the Sullivans Cove Scheme Signs Schedule, rather than focusing on context, there is emphasis placed on the cumulative effect of signage, visual clutter, appropriateness of scale relative to size of a building and impact on the building it is to be affixed. It also allows discretion for a sign to be 7% of the area of the façade. It appears that proposed signage scheme would align with the Sign Schedule of the Sullivans Cove Scheme albeit not envisaging a structure of this nature.

The 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.

4.0 Historic cultural heritage and community values

4.3 Historic Cultural Heritage

4.3.2 Dismantling/relocation of heritage listed buildings

The Red Shed

It is noted that a new Conservation Management Plan (CMP) has not been supplied for the Red Shed and therefore decisions are yet to be made about its potential retention / relocation. This documentation should have been provided to the TPC at the time of lodging the application so that an appropriately well-informed decision be made. It would be pe-emptive and tokenistic to approve the demolition or removal of this (or any) structure of local heritage significance on the basis that a yet-to-be prepared CMP would guide its future.

Notwithstanding the above, the relocation or storage of the Red Shed for future re-erection at an unspecified place do not seem to accord with its modest level of heritage value. Its removal, though having some adverse impact, is likely to be assessed as acceptable in the context of the Project.

The Goods Shed

The City concurs with the Panel’s point raised at 4.3.2 (g), that ‘the methods for dismantling

and relocation of the Goods Shed have not been stated’.

Further to this argument is that an updated CMP has not been provided, nor has a detailed methodology and construction plan that shows re-location is technically possible and precisely how it would be undertaken. It is necessary to show that re-location is actually possible and to specify precisely what changes or interventions (i.e. new foundations, replacement of defective members, faithful sequencing of moved components) would be involved so the heritage impact can be properly assessed.

Moreover, the extent to which the re-location, re-orientation and adaptation of the Goods Shed would affect the State heritage values is not clearly understood in terms of physical aspects such as original fabric or design, or intangible features such as use or association. The changes that would result from the Project need to be systematically related to the attributes of the Goods Shed which underpin its State Heritage value so that the Commission can understand the heritage effects of the Project.

Given the high-level adverse heritage impacts of this Project on the Goods Shed, typical mitigative measures such as oral history, archival recording, on (and / or offsite) interpretation of the history and cultural significance (all of which should occur) are unlikely to be commensurate with the scale of heritage impact.

If the detailed methodology and construction plan, along with a new CMP concluded that the core aspects of the heritage value of the Goods Shed could not be retained by the proposed re-orientation, re-location and adaptation, more radical mitigation might be considered, such as not seeking to retain the structure and installation of an interpretive exhibition on the site and saving the funds from its re-location to contribute to Hobart’s heritage in more innovative and impactful ways. Please refer to [Appendix 4](#) for more information.

This advice has been provided without the benefit of a CMP for the Red Shed and the Goods Shed being available to analyse.

5.0 Aboriginal heritage

The following section on Aboriginal heritage has been prepared based on specialist advice obtained from Sharnie Read, Aboriginal Heritage Advisor from Paliti rruni – Island Spirit (see [Appendix 5](#)).

The City notes that the Panel was unable to make findings on the impact of the Project on Aboriginal heritage and cultural landscape values in the report due to the absence of feedback provided by the proponent through engagement and assessment by the Aboriginal community. Furthermore, the City agrees with the Panel’s view that ‘only Aboriginal people can truly speak to and understand the Aboriginal cultural landscape values of the place’.

In a similar vein, the City holds misgivings regarding the adequacy of the documents submitted regarding Aboriginal heritage (Appendix HH & Appendix K) because of the lack of engagement by the proponent in meaningful consultation with the Tasmanian Aboriginal community.

It is noted that additional reports were supplied on 31 January 2025 to the TPC as part of a

further information request, namely, Annexure N: Tasmanian Aboriginal Community Engagement (Cultural Heritage Management Australia) and – and Annexure O: Aboriginal Heritage Assessment Report (Southern Archaeology). These reports, although not subject to peer review due to budget and time constraints, do not alter the following advice regarding the impacts of the Project on Aboriginal heritage.

5.1 Aboriginal heritage materials

The report entitled *Previous Aboriginal Heritage Investigations* – (Macquarie Point Development Corporation, July 2024) at Appendix K, which comprises mapping of cultural sensitivity and potential cultural material is consistent with accepted practice in the field of archaeology. However, it is not necessarily accepted by the Aboriginal community as an appropriate method to protect Aboriginal heritage.

This methodology only serves to protect one element of heritage, that being physical or tangible objects and is the statutory approach legislated through the *Aboriginal Heritage Act 1975*. However, this approach does not involve the necessary consultation that is required with the Aboriginal community or any consideration of Aboriginal cultural or spiritual values associated with the mapped areas.

It is evident that this report has been prepared from a scientific view rather than an Aboriginal view which alters the value attributed to the tangible objects and minimises the significance of the items or material and their association to cultural values.

The Aboriginal view is that such items are part of a greater picture or story of culture and country associated with the material that is a direct connection with culture.

5.2 Aboriginal cultural values and landscape

With respect to *Pre - Stadium Cultural and Landscape Values Assessment* (Southern Archaeology, August 2024) at Appendix HH, the information contained regarding ethnohistorical data is extensive in its nature but is not considered culturally adequate.

This report provides a comparatively detailed overview of the traditional occupation of the much broader boundaries of the country of the Tasmanian Aboriginal Southeast Nation and associated Aboriginal groups of the southeast nation, however it only provides a *limited* summary of land use practices associated directly within the project boundary.

Some references are made to the observation of Aboriginal people's seasonal movements along with descriptions of cultural materials as observed and recorded during the early 18th century, but these are not directly within the project boundary. While it is accepted that limited historical records will impact on the results of such research, it is seen as inadequate research if not accompanied by Aboriginal community knowledge and input.

It is acknowledged that while this report might technically meet the requirements of section 5.1 of the TPC guidelines, from an Aboriginal community view, the report is not representative of the standards or expectations of Aboriginal community focused research that includes meaningful engagement and reciprocity between the researcher and the individuals / communities involved in the research. This report relies on historical records

from only a non-Aboriginal view, whereas it should, but does not, provide detailed records or descriptions of generational or inherited Aboriginal knowledge.

The City highly recommends that the proponent engage in meaningful Aboriginal community consultation, that is led and driven by Aboriginal people. Furthermore, it is recommended that the future management of 6,596 cultural items identified in the report is a priority and Aboriginal community consultation should be undertaken as a matter of urgency.

6.0 Use and activity

6.2.3 Upper Queens Domain

(f) The City acknowledges the challenges around the parking management of the Upper Queens Domain and is actively engaged in the parking and transport management of this part of City. The City regularly hosts simultaneous events and with careful integrated transport and event planning, believes that scalable event management plans can be developed to manage the requirements for patrons and the public transport network to ensure existing users of the Domain can maintain access and egress.

Further to this, the City considers that there are only a limited number of events held on the Queens Domain that would draw their own significant demand for parking across the wider area. These include:

- Anzac Day Parade / Service;
- Royal Hobart Regatta;
- Domain International Tennis Tournament;

(g) For local sporting games occurring at conflicting times, as discussed in the response to

Section 6.2.3 (i) and (j), it would be feasible to close part or all of the adjacent off-street carpark serving each sporting field if required.

Conferences would most likely occur during business hours, at which times the majority of public parking on the Queens Domain is already made available for all day parking (for a fee) by the City. This parking would be available to conference visitors, and given the City currently makes these spaces available for all day parking for commuters working in the Hobart CBD and its surrounds, it is not considered that additional demand for these spaces would create an unreasonable impact on existing uses during business hours.

(h) The City is of the view that the off and on-street carparking located on the Queens Domain will be sought after by patrons of events at the proposed stadium, and with high quality pedestrian connections in place to cross the Tasman Highway (the Bridge of Remembrance and the underpass under the Tasman Highway at McVilly Drive) this parking may be suitable and appropriate for patron use.

(i) & (j) The City supports these conclusions, but is of the view that such management will be feasible and functional. In the past, parking at the Aquatic Centre has been protected by staffing the car park, and for the Domain International Tennis Tournament, the 'TCA Car Park' opposite the event site is closed to public access on event days, and reserved for use by visitors to the Tournament.

These measures can be achieved, and while there is a cost in doing so (loss of revenue from paid parking if a carpark is closed to public access, and cost of implementing closures of car parks and staffing closures as required), there is also the opportunity to a fee to be charged for use of car parks and car parking spaces not required for conflicting events. This fee could cover the cost of implementing changes and staffing off-street carparks, and potentially could also be used to raise funding to construct infrastructure upgrades on the Domain, or for pedestrian upgrades in the area surrounding the proposed stadium.

If the event parking arrangements put in place on the grassed area adjacent to the Cenotaph were also utilised, and a suitable fee charged, this would be expected to both provide a large supply of parking with close access to the stadium and provide a significant revenue stream that could contribute to the costs of pedestrian upgrades in the area.

6.2.4 Other use and activity in the surrounding area

The City appreciates the Panel's concerns regarding the operation of adjacent streets during events, in particular Evans Street and Hunter Street, however, as established through the City's busy events calendar, the ability of the City and Sullivans Cove to accommodate multiple events simultaneously is well established.

The City welcomes further dialogue between the proponent and the panel to go through various options to potentially alleviate some of the Panel's concerns regarding the potential conflict between vehicles and pedestrians.

7.0 Transport and movement

Summary

The City agrees that 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. Analysis undertaken by GHD reiterates these concerns (see [Appendix 6](#))

How significant this disruption would be will depend on a number of factors, including the success or otherwise of the countermeasures proposed to mitigate the risk:

- provision of new public transport infrastructure and increased services;
- provision of improved pedestrian infrastructure on pedestrian desire lines to limit any need for lane or road closures on surrounding arterial roads, and;
- the ability to schedule large crowd events at times when the expected most intense generation of crowd and vehicle movements associated with those events (the period immediately post event) do not coincide with periods of high demand on the surrounding arterial road networks (weekday commuter peak periods, and weekend mid-day periods).

7.1 Pedestrian Movement

7.1.1 Post-event pedestrian movement

(c) The City agrees that existing pedestrian pathways and linkages to the Macquarie Point site are currently inadequate to cater for the significant pedestrian activity that would be associated with post event discharge of patrons from a stadium, without requiring extensive temporary event traffic management and control.

It should be noted that the City is of the view that existing pedestrian pathways and linkages will be inadequate to appropriately cater for any significant redevelopment of the Macquarie Point site from its current industrial use, and that as such upgrades to the footpaths on Evans Street, Hunter Street etc will be necessary to facilitate the day to day use of the Macquarie Point precinct regardless of its future use.

In relation to the specific section of footpath on the south-eastern side of Davey Street between Evans Street and Hunter Street, this section has a current minimum width of about 3.7m, which could be increased to a minimum of about 7.0 metres, if the indented parking and bus zone were removed. If required, this could be facilitated by reconstructing the parking bay and footpath to be at a consistent level, with a flush kerb and removable bollards providing separation (the system used successfully in the Salamanca Place precinct). This would allow the parking and bus zone to be removed, and a wider trip free footpath provided during events where significant event pedestrian flows are anticipated.

(d) The City agrees broadly with this comment, but also notes that it is considered likely that many patrons of stadium events will choose to drive a private vehicle and park in available public and private on and off street parking spaces in the surrounds of the area. The largest supply of these parking spaces (particularly when events do not coincide with business hours) are in the Hobart CBD, and in relation to on-street parking the inner suburbs such as North Hobart, West Hobart etc, where during business hours many city workers park and walk into the CBD.

The City expects that as such, there would be strong demand for pedestrians post event walking back to the location of their parking to seek to cross Davey Street and Macquarie Street in the vicinity of the Brooker Highway, Campbell Street and Argyle Street to return to those vehicles.

(f) The City broadly agrees that it is difficult to manage the large flows of pedestrians that exit large events, and that historically it typically requires short term road closures to ensure public safety. For previous such events at the Regatta Grounds / Cenotaph or on the Macquarie Point site, this has included short term road closures on Tasman Highway / Davey Street as large crowds of pedestrians can and do tend to choose to take over those spaces regardless of the messaging and temporary infrastructure that is put in place.

Overall, the City would have 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 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.

The City is of the view that pedestrian footpaths on Evans Street, Hunter Street, and the southern side of Davey Street between Evans Street and Elizabeth Street, along with infrastructure improvements to facilitate the placement of crossing facilities for pedestrians

to cross Evans Street and Hunter Street that as close as practically match the desire lines of pedestrians, will be necessary to improve pedestrian access to the Macquarie Point precinct.

This will be important regardless of the future development of the precinct (assuming that the precinct contains public uses) but will be of significant importance if a stadium is developed in the precinct, as it will minimise the need for special event road and lane closures during smaller events, and in the lower pedestrian volume times prior to and during larger events.

The City has in the last ten years developed significant expertise in designing and implementing pedestrian treatments in the Morrison Street – Castray Esplanade – Salamanca Place precinct, where design treatments utilising flush kerb lines, and relocatable fixed bollards to separate vehicular and pedestrian zones have been successfully used. These treatments allow complex urban spaces to be flexibly designed such that they can be easily changed from 'normal' arrangements to 'event' modes.

The City is of the view that a similar treatment could be designed and constructed on the key pedestrian desire line on the Hunter Street northern footpath and through the crown owned parcel of land at 47 Hunter Street and across Evans Street to the Macquarie Point site. This would allow a high quality wide pedestrian linkage between Franklin Wharf and the Macquarie Point site, that could be further widened on event days.

It is the view of the City 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. Such an upgrade would likely need to be initially constructed in temporary materials to be ready for the opening of the stadium, and then constructed permanently in high quality materials after considering its function and success during initial events, and as funding becomes available.

(i) Response to Panel's concerns regarding Collin's Street (paragraphs 4 and 5):

The City agrees that 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.

A Collins Street pedestrian bridge has however been identified as an important future pedestrian linkage to improve pedestrian accessibility between the Hobart CBD and the Cenotaph / Macquarie Point precinct and Inner City Cycleway, that in the view of the City should be progressed regardless of whether a stadium forms part of that precinct.

A key constraint faced by the Cenotaph / Macquarie Point precinct is the disconnection between the precinct and the Hobart CBD caused by the key state road network (Davey Street, Macquarie Street, Brooker Highway and Tasman Highway), and the perceived and actual difficulties that crossing these roads cause for pedestrians seeking to move between these zones.

Given it is unlikely that these roads are going to become less important to the statewide and regional transport network, the need to keep these roads open and operating at sufficient capacity will remain an ongoing constraint.

The only feasible way to provide a high-quality pedestrian linkage would be through grade separation, via a pedestrian bridge (such as a bridge between the Cenotaph and CBD via Collins Street, or a pedestrian underpass (such as a linkage from the Elizabeth Bus Mall to Brooke Street via Franklin Square).

In terms of the impact or desirability of a Collins Street pedestrian bridge introducing large number of pedestrians onto Collins Street (into the Campbell Street and Argyle Street area), the City is of the view that any measure that reduces the number of pedestrians using and interrupting vehicular traffic on the state road network, and instead focuses those pedestrians into the commercial heart of the City is a net positive.

Context

In response to comment's provided by DSG:

The City understands that there are currently a number of events each year for which lane closures or full closures occur on Tasman Highway – Davey Street or Macquarie Street.

As such, lane closures or full closures are certainly possible, but it should be noted that these occur only for short-limited periods, and also occur on public holidays, evenings or weekends, at times of the day when such closures are considered reasonable in terms of their disruption on the travelling public.

They are also for events that happen once a year (Anzac Day Parade, Run the Bridge, Hobart Marathon etc.) and are extensively advertised to the public for weeks in the lead up to the disruption using Variable Message Signs, advertising etc.

While it is a matter for the Department of State Growth, it would be problematic to the transport network, and difficult to effectively communicate if there were closures of lanes or roads routinely required for events at the proposed stadium.

Section 7.4 Parking

(c) The City owns and operates three large multistorey car parks in the Hobart CBD. These are the 'Argyle Street Carpark', the 'Hobart Central Carpark', and the 'Centrepont Carpark'. The 'Salamanca Square' carpark and the 'Melville Street Midtown Carpark' are other multi-storey carparks in which the City provides public parking.

These multi-storey carparks have only limited spare capacity available during business hours, but would have a significant amount of spare capacity available to service potential events on weekday evenings, on public holidays, and on weekends.

For these multi-storey carparks to be utilised for high patronage events at a potential stadium (which would most likely be in the evenings / night, or on weekends or public holidays), the hours of operation of these carparks would need to be extended. This is typically feasible, but carries costs associated with provision of staff and security.

For large events, an appropriate fee could be charged for the use of these facilities.

In general, patrons would be expected to prefer to find free on-street parking, due to the cost saving and ease of access compared to entering and exiting a multi-storey carpark.

There are at times delays and congestions exiting the Argyle Street Car Park. This is most

commonly an issue on weekday afternoons due to high numbers of exiting vehicles combined with high pedestrian and general traffic on Argyle Street itself.

(f) While the views of the areas at the City that manage the sporting facilities and off-street parking areas on the Domain would need to be sought, the City is aware from previous large scale public events that there is a need to ensure that patron parking for sporting facilities on the Domain remains available, if the times of demand for these large scale public events crosses over with the operating hours of these facilities. This is particularly important for the Aquatic Centre, which has many patrons with limited mobility which rely on the on-site parking to be able to access the facility.

As previously described, important car parks could be managed for events by staffing the entrances, and the costs of undertaking this staffing recovered by the charging of a suitable fee for use of off-street parking spaces where capacity exists.

(g) At the aquatic centre, and at other car parks servicing particular uses on the Domain when the times of use of those facilities conflicted with a large public event at the proposed stadium, it would be necessary for the City to either close off parts of the car parking or to have an employee supervising access into the carpark to ensure that it is used by patrons of the facility.

When required, this would impose labour costs on the City, however it should be noted that on days where parking demand is expected to be sufficiently high so as to require active management, there would also be the opportunity for a suitable fee to be charged for parking, allowing such costs to be re-couped.

Consideration could also be given to providing the normal special event parking on the grassed surrounds of the Cenotaph and charging an appropriate fee for the use of the facility only where alternative event day public transport provision has not been put in place.

8.0 Environmental effects

8.1 Site contamination and suitability

Council agrees with the Panel's comments as well as the issues raised by the EPA in its submission (Dated 24 October 2024).

Council wishes to formally acknowledge that appropriate approval conditions will need to be drafted to address the Act pursuant to which, and the permit, licence or other approval in which, each condition would normally be imposed. Drafting of these conditions may require direct input from the Council, at the appropriate stage of the assessment process.

If the Environmental Site Assessment report concludes that remediation and/or protection measures are necessary to avoid risks to human health or the environment, a proposed remediation and/or management plan must be submitted as a condition endorsement prior to the issue of any approval under the *Building Act 2016* or the commencement of work on the site (whichever occurs first). Any remediation or management plan involving soil disturbance must include a detailed soil and water management plan to minimise off-site transfer of potentially contaminated soil or stormwater.

8.2 Groundwater

Council agrees with the Panel's comments as well as the issues raised by the EPA in its submission, dated 24 October 2024.

Council wishes to formally acknowledge that appropriate approval conditions will need to be drafted to address the Act pursuant to which, and the permit, licence or other approval in which, each condition would normally be imposed. Drafting of these conditions may require direct input from the Council, at the appropriate stage of the assessment process.

8.3 Stormwater

Council notes the concerns raised by the Panel and has provided detailed responses below. In addition to this feedback, Council wishes to note that management of the northern access road proposed to run over the Hobart Rivulet will need to be carefully considered.

Council provides the following feedback to each of the points raised by the Panel:

(b) Council notes that previous use of the area as a TasRail and ports storage area means that historically much of the site has been impervious.

(c) The stormwater line to the east draining catchment 5 and the line to the southeast draining catchment 4B (SW4B/4 pg. 29 Appendix BB) are not shown on Council's assets register and are likely to be TasPorts SW lines. Use and ownership of these lines will need to be confirmed.

(d) Council notes that there are several unconfirmed variables including ownership and capacity of some of the pipes included in this assumption. Council also notes a number of assumptions that may be incorrect including the assumed 1% grade for the pipe servicing catchment 3, where advice has stated specifically that "pipe has a low grade, is subject to tidal inundation and has issues with sediment build up". This advice does not appear to have been incorporated in the capacity estimate.

The proposal flagged to use the unconfirmed pipe at area 4B to drain the stadium roof is subject to significant assumptions given the lack of detail on grade, capacity and ownership of this pipe (SW4B/4 to SW4B/1). Whilst this option may be possible these assumptions must be confirmed. From Council records it appears that this pipe is in TasPorts ownership. The suitability of draining the stadium through a private pipe system must also be confirmed.

(e) Overland flow paths must be clearly identified and managed through the site to ensure downstream flow does not adversely impact neighbouring properties. Any impacts on neighbouring properties should be clearly identified.

(f) Council agrees that the potential for exacerbating flooding on adjacent land has not been thoroughly addressed considering the mapping on Page 11 of the BMT Macquarie Point Stormwater Management Plan - Final Report, that shows the areas south of the stadium may experience flooding.

Also note that the climate change factors have recently been updated and factors used in the modelling are no longer current. It is unclear if the flood report takes into account the flow from the development site when fully developed.

(h) Council concurs with the Panel on this issue.

(j) Council concurs with the Panel on this issue.

(l) Council notes that while the discharge targets from the State Stormwater Strategy are generalised, it could be possible to adopt site specific discharge targets based of the DGV values for the lower Derwent/ Derwent Estuary - Bruny catchments. DGVs for Hydrological Region 1 Tasmanian Inland Waters.

Council notes there have been some discussions that storage and reuse of roof water may be able to be managed on Council land, however, this will need to be confirmed.

(m) Council notes the likely specific impact of significantly increased litter loads given the proposed use and identifying how these loads will be prevented from entering the Derwent is paramount. 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.

(n) Council concurs with the Panel on this issue.

8.4 Excavated material management

8.4.(i) Current Landfill space

The City shares the Panel's concerns regarding constraints on available nearby landfill sites. McRobies Gully Waste Management Centre (McRobies) may only be able to accept low quantities of fill from the Project. The Hobart City Council Good Neighbour Agreement imposes a cap of 2,500 tonnes per week to limit clean-fill large-truck movements to fewer than 20 per day. The City understands the estimated total for the Project is 140 per day. Additionally, our annual caps are already allocated to existing contractors. These caps could be raised considerably, but this is unlikely to be supported.

The City would like to understand the proponent's intention regarding disposal of this volume of fill. It is acknowledged that Glenorchy City Council may be in a position to accept some of it, and Southern Waste Solutions Tasmania has communicated some limitations with the Copping Landfill site. It is also noted that the difference in transport cost from the City to Copping versus the City to McRobies is an order of magnitude.

The City would appreciate the opportunity to discuss this issue in more detail during the Hearings process.

8.5 Noise

Council wishes to acknowledge the Panel's comments. In response to the applicant's documents lodged, the City undertook a peer review of the information provided (pre-January 2025) and has included the information as an appendix XX.

The Council welcomes receiving additional information from the Proponent to address the concerns raised.

8.6 Lighting effects

The Panel raises some key deficiencies in the lighting assessment, particularly around the conceptual nature of the lighting scheme. Although detailed, the analysis is based on multiple assumptions. The report itself even states the following:

“The sports lighting scheme and arrangements are still in development and the sections below are based on the current concept design”

The level of luminance generated as a result of the specifics of the transparent roof design does not appear to be considered and could vary depending on the final materials used and the design. This factor is considered relevant, considering that the transparent section of the domed roof equates to a significant portion of the built form and is the most visible element of the stadium from further afield.

There is limited detail on the peripheral lighting for the stadium however the potential impacts can be adequately managed in accordance with the *Australian Standard 4282:2019 Control of the obtrusive effects of outdoor lighting*. The one major lighting element that is currently unknown is the large stadium naming signage. The City is generally supportive of the size of the signage due to its relevance of the scale to the stadium and its likely proposed integration into the design. However, the potential impact from the illumination of this signage needs to be appropriately assessed.

8.7 Wind effects

Council acknowledges the concerns raised by the Panel and welcomes the continued development of the precinct plan and detailed ground plane designs to facilitate a comprehensive understanding of potential wind impacts. Council would like to further note 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. Given this challenge, the City is mindful of placing too much emphasis on mitigation at the expense of effective crowd management particularly for larger capacity events (over 23,000 people events) where large, flexible gathering spaces are a requirement of functionality.

9.0 Construction program and sequencing

The City shares the Panel's concerns regarding the lack of detail regarding construction programming and dependencies between related projects and the construction of the stadium occurring simultaneously. Traffic network impacts will need to be carefully managed as well as the impact on local residents and affected businesses.

The City expects highly detailed approval conditions regarding construction management to be established for the Project and welcomes further dialogue on this complex issue.

10.0 Ministerial Direction Matters

10.3 Consistency with the Mac Point Precinct Plan

(e) The City concurs with the Panel to some degree that the Project does not support or promote integrated urban renewal of the site (as set out in Section 3.0 Urban Design), however, with careful detailed design development, mitigation of some of the issues can be achieved.

(j) The City agrees with the Panel that in order to improve functionality and safety of the proposed stadium design, additional dedicated space around the stadium building should be sort. The City implores the proponent and TasPorts to consider adjusting the eastern stepped boundary (as shown on Figure 2 below) as a matter of priority to allow for the full realisation of the Complementary Integrated Mixed Use Zone and Antarctic Facilities Zone as originally envisaged which will also go some way to alleviate some of the many pinch points identified around the precinct.

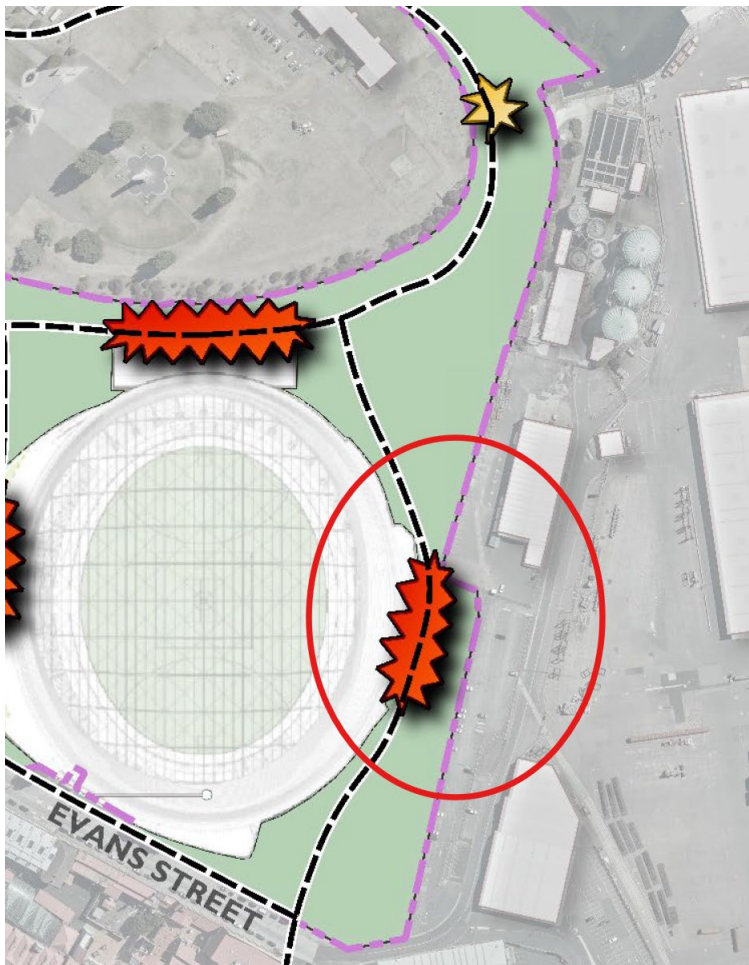


Figure 2. Stepped boundary issues between MPDC & TasPorts

11.0 Other issues

11.1 Conditions

The assessment of a proposal for planning permission must involve consideration of the specific conditions to be imposed on any permit which may be granted. The formulation of conditions is inextricably linked to the consideration of whether a permit should be granted.

This fundamental proposition has support from both the Full Court of the Federal Court of Australia and the Full Court of the Supreme Court of Tasmania.

To date, we have only seen conditions drafted by the Applicant (Appendix 2.0 List of Proposed Conditions). We have concerns regarding the appropriateness of those conditions.

The City requests that the Panel specifies the conditions which may be appropriate to be imposed on a permit, if it is granted, as soon as possible so that the conditions can be considered as part of the Hearing process.

11.2 Subdivision

Additionally, the area which sits over the Hobart Rivulet is of particular interest as the City owns title CT 1/176538 which is split into two parts on the western (NW) and eastern (NE) sides of the Cenotaph site. It is noted that the annexure sheets to the sealed plan of this title are annotated with height limits which repute to limit vertical boundaries, the NW part by 5.39m RL (AHD) and the NE part by 4.65m RL (AHD). This area also comprises two titles owned by MPDC (Part of CT 2/179192 and CT 4/179192). However, it is unclear from the proposed subdivision plan whether these two titles owned by MCDC are also proposed to include height limits to accommodate the height limits on the title owned by the City.

With regard to the statutory process followed for subdivision, when the City receives a development proposal across multiple titles in common ownership, conditions on a permit will require the titles to be adhered in accordance with section 110 of the *Local Government (Building and Miscellaneous Provisions) Act 1993*, prior to the issue of any building consent, building permit and/or plumbing permit or the commencement of works on site (whichever occurs first).

Conclusion

The City looks forward to discussing the issues raised in its submission in further detail to achieve an amenable outcome for the Project. Please feel free to reach out if any of the issues raised require clarification.

Council welcomes further opportunities to meet with the Panel and the Proponent to review our feedback and concerns. The significant investment in City infrastructure required to support the Project on an everyday basis and in 'event' mode will require careful planning and capital investment and will need to be factored into the delivery of the Project.

Given the compressed timelines for the Project, we request pedestrian connectivity, streetscape modifications, road network and parking facilities upgrades be given high priority to allow sufficient time to plan, request and allocate appropriate funding and resources at a state and local government level.

Yours sincerely,

A handwritten signature in blue ink, consisting of a large 'M' followed by several loops and a trailing line.

(Michael Stretton)
CHIEF EXECUTIVE OFFICER

Appendixes

[Appendix 1: Macquarie Point Stadium Economic Impact Assessment, AEC Group Report](#)

[Appendix 2: Landscape and Urban Form, Leigh Woolley](#)

[Appendix 3: Urban Design Advisory Panel Submission, UDAP](#)

[Appendix 4: Cultural Heritage Issues, MacKay Strategic](#)

[Appendix 5: Aboriginal Concepts Review, paliti runi Island Spirit consultancy](#)

[Appendix 6: Movement Technical Review, GHD](#)

[Appendix 7: Noise and Vibration Technical Review, GHD](#)

