Mac Point Draft Precinct Plan

City of Hobart Submission

November 2023





9 November 2023

Mac Point Draft Precinct Plan 41 Evans Street Hobart TAS 7000

Submitted via email: submissions@macpoint.com

Dear Ms Beach,

RE: City of Hobart Mac Point Draft Precinct Plan Submission

Thank you for the opportunity to provide a submission on the Mac Point Draft Precinct Plan ('the Draft Precinct Plan') released on 21 October 2023.

It is noted that under Part 2, Section 7. 'Functions Of Corporation' of the *Macquarie Point Development Corporation Act 2012*, the Corporation is required -

(d) to consult with the Tasmanian community, and those persons or bodies whom the Corporation considers to have an interest in relation to the redevelopment of the site, in relation to options for the redevelopment of the site;

It is argued that given the Statutory Role and Duties of the City of Hobart, and the adoption of the *Sullivans Cove Planning Scheme 1997* by the Resource Planning and Development Commission in December 1998, it is reasonable that the Council would be identified as an administrative body with an interest in the site's redevelopment. Therefore, we welcome further dialogue and meetings with Macquarie Point Development Corporation (MPDC) to review our feedback and concerns as set out in the submission below.

Statutory planning framework and context

It is noted that the land subject to the Draft Precinct Plan currently falls under the provisions of the Sullivans Cove Planning Scheme 1997 (SCPS).

As you may be aware, the City of Hobart, in its move to the Tasmanian Planning Scheme has translated the SCPS to the Local Provisions Schedule (LPS).

As part of this translation, it is proposed that the following TPS zoning will apply to the land subject to the Draft Precinct Plan (subject to finalisation in the Tasmanian Planning Commission [TPC]):

 Macquarie Point – the Macquarie Point Particular Purpose Zone (PPZ) is a translation of the use and development provisions of the Macquarie Point Site Development Plan (Part F of the SCPS) and introduction of the *Macquarie Point Strategic Framework and Masterplan* 2017-2030 as an Incorporated Document;

- Huon Quays the Huon Quays Particular Purpose Zone (PPZ) will support the existing use of the site for port and marine related activities, protect the heritage significance of the Drill Hall and Commanders Residence and encourage development that reflects the landscape values of the site; and
- Hobart Regatta Grounds (Both Council and Crown Land) it is proposed that the Open Space Zone be applied to this land. It is noted that residential development is prohibited under this zoning.



Figure 01: Proposed zoning map as per LPS Schedule (Draft)

Implementation of the Precinct Plan

To implement the final Precinct Plan, a planning scheme amendment will be required to remove the now obsolete *Macquarie Point Strategic Framework and Masterplan 2017-2030* and replace it with the final Mac Point Precinct Plan (including detailed urban design guidelines) as an Incorporated Document.

It is acknowledged that the planning scheme amendment will not apply to the Stadium proper (illustrated as a stadium footprint in the Draft Precinct Plan) which has been declared a Project of State Significance and subject to an alternative approval pathway through the TPC.

In addition, it is anticipated that some changes may be required to the zoning of the precinct, namely the Regatta Grounds, to facilitate the desired residential development outcomes articulated in the Draft Precinct Plan.

Sustainability Considerations

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.

In addition, 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.

2.0 Design considerations

The Quantified role of the Sullivans Cove Planning Scheme 1997

The *Sullivans Cove Planning Scheme 1997* (SCPS) represents the primary source of cultural, urban form and land use analysis document for the Macquarie Point area and the wider Cove. Its development was based on a broad range of pre-existing planning strategies, management plans and studies. It is argued that it has been the principal documentation that has guided the successful transition of the Cove from working port to leisure and cultural destination whilst maintaining and celebrating its fundamental character and buildings of cultural significance. Importantly, it draws upon The Conservation Plan by J. S Kerr, 1996 and the *Burra Charter*: The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance 1999 as adopted by the Australian National Committee of the International Council on Monuments and Sites 1999.

It is noted that the SCPS, The Conservation Plan or Burra Charter are not referenced or referred to within the Draft Precinct Plan. The omission of these guiding documents when discussing heritage is not considered appropriate.

The Heritage Provisions of the Sullivans Cove Planning Scheme 1997

It is acknowledged that the Draft Precinct Plan is intended as a high-level statement of intention without proving significant detail as to the intended built form. However, the site requires consideration of Schedule 1 – Conservation of Cultural Heritage Values which states that:

"Conservation of the cultural values of Sullivans Cove is the primary objective of the Scheme. Where there is an apparent conflict with other objectives, the conservation of cultural heritage values takes precedence."

It is appropriate therefore that the primacy of cultural heritage values should be referenced by the Plan.

Schedule 1 - Section 22, identifies places of cultural heritage significance. It also identifies development objectives within places of cultural significance and places of archaeological sensitivity. The objectives of Schedule 1, defined in Section 22.2 are:

- To provide the mechanisms to allow the conservation of heritage values.
- To provide an incentive for 'building or works' to be carried out in a manner which is compatible with conservation of cultural heritage values.
- To ensure that the recognisable historic character of Sullivans Cove is not compromised by new development which overwhelms the places of cultural significance, or, by new

development which reduces the apparent authenticity of the historic places by mimicking historic forms.

• To encourage new development to be recognisable as new, but not individually prominent. Such development must reflect a "good neighbour" relationship to places of identified cultural value.

Section 22.4 establishes the scope for the conservation of places of cultural heritage significance. The following criteria, established under Section 22.4.5 apply to the granting of discretionary permits for works on these places must be taken into consideration in assessing all proposals:

- 'Building or works' must complement and contribute to the cultural significance, character and appearance of the place and its setting;
- 'Building or works' must be in compliance with the conservation strategy of an approved Conservation Plan, where required and/or provided;
- The location, bulk and appearance of 'building or works' must not adversely affect the heritage values of any place of cultural significance;
- 'Building or works' must not reduce the apparent authenticity of places of cultural significance by mimicking historic forms;
- 'Building or works' may be recognisable as new but must not be individually prominent;
- The painting of previously unpainted surfaces is discouraged.

Section 22.6 establishes the requirements for heritage management of places of archaeological sensitivity. The following criteria, established under Section 22.6.5, must be taken into consideration when assessing discretionary permit applications for works on these places:

- The likelihood of the proposed 'building or works' resulting in the removal or destruction of items of archaeological significance.
- The cultural significance of the site.
- Evidence of an adequate archaeological reconnaissance and site sampling prior to the approval or carrying out of works.
- The need to reasonably protect potential archaeological significance during the design, and carrying out of works.
- The need to undertake an archaeological 'watching brief' to be required during the carrying out of works.

2.1 Site History

The general history of the site as set out in 2.1 'Site History' of the Draft Precinct Plan, whilst not disputed, is relatively limited in scope, and relates primarily to the area of the former rail yards.

The roles of these various uses in the development of Hobart and the wider Tasmanian State are not investigated, nor how these past uses might in some way be expressed in the design and form of the Precinct (a point acknowledged in 2.5.1 Key Themes).

The history and cultural/community significance of Huon Quays, the Regatta Grounds and most notably the Cenotaph and Cenotaph Avenue (The Precinct Plan also refers erroneously to this site as Anzac Parade) are not addressed. The features and locations have traditionally and continue to play a significant role in the communal and social life of the City.

The Precinct Plan should therefore directly acknowledge these important roles and comment on how this might be impacted upon, either directly or in context to new development, and how this might be mitigated, acknowledged and addressed in the resulting built form.

2.4 Heritage Listed Sites

It is noted that section 2.4 'Heritage Listed Sites' of the Draft Precinct Plan and accompanying Figure 18 'Heritage Listed Sites' identifies sites solely identified on the Tasmanian Heritage Register.

City of Hobart, as the relevant Planning Authority, have identified and adopted a number of additional structures and sites as Places of Cultural Significance within the SCPS and to the wider surrounding town and landscape within the *Hobart Interim Planning Scheme 2015*.

The Draft Precinct Plan states that the site will be assessed through the Project of State Significance integrated assessment process, although it should be noted that this is not guaranteed under the current legislative procedures. Nonetheless, under the requirements of the *State Policies and Projects Act 1993* and Ministerial direction, the Commission is still bound to seek submissions from the City of Hobart as the relevant Planning Authority.

It is therefore questioned as to why there are no reference to those structures and sites specifically within the designated boundaries of the Draft Precinct Plan.

These sites are -

- 10 Evans Street Goods Shed
- 10 Evans Street Red Shed

The MPDC identified these sites under a broader heritage review of the precinct undertaken by Austral Tasmania. A request was received from the Corporation for the listing of these sites as part of a suite of Planning Scheme amendments in 2015 (2/2015). The Corporation identified heritage management as a key factor in the site's future development and the two above sites were identified.

Both buildings were assessed by Austral Tasmania against the *Historic Cultural Heritage Act 1995*. The Goods Shed, in particular, was identified as a rare surviving structure directly associated with the former use of the site as railway yards and terminus of the former passenger service to Hobart. Originally built in 1915 and extended in 1945, it's construction, form and orientation are directly and authentically associated with its former rail use and is a valuable and largely complete part of the States industrial heritage. It was therefore concluded that the Goods Shed had State and local significance and the 'Red' Shed had local heritage significance.

The MPDC's heritage documentation was reviewed internally by the City of Hobart and it was concluded that the submitted documentation made compelling arguments for the heritage listing of these two structures. Their adoption by amendment of the Planning Scheme was approved on 18 November 2015.

The Goods Shed is currently being assessed for listing on the Tasmanian Heritage Register by Heritage Tasmania. The Draft Precinct Plan states that the Macquarie Point Development Corporation will work with the State heritage body to 'ensure appropriate management of the Goods Shed'. It is noted however that the building stands within the area designated for the Multipurpose Stadium. Despite this, the Draft Precinct Plan is silent on the specifics of the building's future.

The City of Hobart notes that the Tasmanian Heritage Council states that its decisions are based upon its own Work Guidelines and the underlying principles of the Burra Charter (Australia ICOMOS, 2013) and be consistent with the objectives of the State's Resource Management and Planning System.

3.0 Precinct Plan

From an urban design perspective, we appreciate the complexities, both opportunities and challenges, that the Macquarie Point Precinct presents. Some of which are; a waterfront site that has limited waterfront aspect, a former industrial site hemmed in by an operational port and water treatment plant, a place that was a productive shoreline for the Palawa, and with the Cenotaph and the Regatta grounds as signifiers of important recent historic meaning.

Furthermore, it is a site that whilst it is in close proximity to the city centre, and the rest of the Sullivans Cove waterfront, it is actually relatively isolated both visually and for pedestrians approaching from the city centre.

We consider the present Draft Precinct Plan as a serious attempt to be bring together the previous masterplanning endeavours, chiefly the Macquarie Point Reset Masterplan (2017), with the present desire to incorporate a multi-use stadium, with the wider considerations of the surrounding land uses, movement, layers of physical and historic meaning with the wider opportunities that have been part of the discourse of recent years.

Some aspects that we would like to emphasise in terms of their urban design considerations are:

- The non-car mode share target of 60% provides a good foundation that recognises the need to provide good public transport and active travel links to the site. Considering the current modal mix that heavily favours private vehicles this undertaking will require all manner of strategies and approaches. Please note, we see the non-car mode share target of 60% as the bare minimum given the heavily constrained parking options around the site.
- the approach along Franklin Wharf, in close collaboration with TasPorts, presents a unique opportunity for a strong visual approach for tourists, who are quite likely to adopt this route (e.g. as per Dark Mofo) as per Figure 47 (page 34 of the Draft Precinct Plan).
- the majority of Hobart's large hotels are located in the city centre so the active travel connectivity from the city centre to the site will need to be significantly enhanced, as per Figure 47 (page 34 of the Draft Precinct Plan), including the much-anticipated pedestriancycle bridge that will be needed to manage the expected crowds (e.g. Suncorp Stadium, Brisbane, and Marvel Stadiums, Melbourne, are clear examples of this).
- Highly visible and prominent the present draft Plan emphasises the visual connection of the Mac Point with the historic Wapping precinct and the rise towards the Queens Domain. The placement of the 'Aboriginal Culturally Informed Zone' as the 'front face' of the precinct raises the following concerns:
 - whatever the final footprint and form the stadium adopts will effectively be its main frontage, as such it will need to be carefully considered so that it is as open and

engaging as possible to ensure that it doesn't negatively impact the sense of safety in the proposed 'Aboriginal Culturally Informed Zone'.

- the 'Aboriginal Culturally Informed Zone' will need to consider the noise and other amenity impacts from the traffic along Davey Street. This presents a design challenge of how to deliver an inviting space that feels protected from the harsh northern edge. Any proposed activities or functions in this area may be heavily compromised and the City has concerns over this space being a viable and respectful space for our First Nations communities. *Please see further comments in Section 3.1.2.*
- The extension of the Draft Precinct Plan to incorporate the Regatta Grounds is positive to avoid leaving these areas as 'orphans'. However, this waterfront section, appears to be less resolved in terms of its integration and complementarity with the rest of Mac Point and its aims.
- Council's waterfront land remains an island that may suffer from underutilisation and lack of cohesiveness with the adjoining Zones. As such we would like to collaborate on the ongoing definition of what a continuous waterfront can offer to Hobartians and visitors alike and any desirable future uses. Particularly given the progression of the Proposed Tram Depot and Display Facility to be located at 20 McVilly Drive which is now in the Concept Design Stage.
- The stated objective of the northern access road is to take access and security pressure off Evans Street, however, it will need to be carefully designed so that it becomes more than a 'service road' and should extend the implicit idea of a pedestrian and people friendly concourse.
- Ample, high amenity, space should be provided, with numerous opportunities for
 pedestrians and cyclists to easily cross it. Council would welcome the opportunity to explore
 how this can be best achieved to ensure this road does not 'separate' the headland from the
 foreshore, rather enhances accessibility and usability for all users.

Interconnected discrete 'zones'

The Draft Precinct Plan sets out a mixed-use precinct comprised of interconnected discrete zones. Whilst Council notes that the precinct plan does not seek to resolve the detailed design of individual developments within these zones, Council has concerns around the footprint location of the Stadium and its impacts on site lines and interfaces with the Cenotaph headland, surrounding heritage buildings / precinct and visual impacts from key locations throughout the city. There are no sections or elevations provided so the building form and it's visual and solar impacts are unclear and underrepresented in the Draft Precinct Plan.

Furthermore, zone scale and environments are hard to ascertain, whilst this is somewhat inherit to the nature of a draft Precinct Plan, if they are not carefully considered they could present challenges. Some of these are a potential lack of natural light, increase any wind impacts and create uninviting dark pedestrian corridors between the proposed stadium footprint and the adjoining secure Port of Hobart site.

The 'Antarctic Facilities Zone' and, probably more so the 'Complementary Integrated Mixed-Use Zone' will need careful consideration of the amenity impacts of any proposed buildings. The use of the ground plane as a pedestrian environment, the type of proposed uses and the general environmental conditions should all be considered in the next stage to ensure they remain attractive places to invest in and visit.

The proximity of the stadium footprint to the Port Secure Zone to the Commercial Port, particularly at the midway junction as illustrated in *Figure 02: Stadium and Secure Port Zone*, raises concerns around access, functionality, public amenity, and urban design excellence.



Figure 02: Stadium and Secure Port Zone interface

Evans and Hunter Street Vision

Evans and Hunter Street are shown in the Draft Precinct Plan and accompany WSP Event Day Transport Summary to be major crowd surge areas during event mode that will also see a major increase in general foot traffic outside of event mode due to a densification of uses in the precinct. Figure 35 (page 24 of the Draft Precinct Plan) indicates that major streetscape upgrades would also be required to facilitate the precinct.

People movement and public amenity design around the main entrance to the stadium would also certainly appear to require the Crown Land at 47 Hunter Street (currently being used as tenanted car parking). Council requests that this site at 47 Hunter Street be considered as 'part' of the precinct given the primacy of its location and requirements to facilitate pedestrian overflow from the concourse. Otherwise, it would appear to be a missed opportunity to resolve as part of the precinct planning. With expected crowd surges at the entrance to the stadium, Council would appreciate further detail as to how the interface around this junction is envisaged to be resolved.

As the local road authority, we welcome the opportunity to meet and progress the streetscape design and vision for Evans and Hunter Street as the project develops.

How the Port Tower base is expected to be accessed from this crowd massing area is also a concern and Council welcomes the opportunity to comment further as the design progresses.



Figure 03: Evans and Hunter Street Vision

3.1 Mac Point Site

3.1.2 Aboriginal Culturally Informed Zone

Council recognises, and strongly advocates for any future development of the site to have an overt overlay of Tasmanian Aboriginal culture. There needs to be recognition and representation of Tasmanian Aboriginal heritage and culture throughout the development. The inclusion of a Truth and Reconciliation Park or a Tasmanian Aboriginal Cultural Centre should be a fundamental principle of the precinct.

This site offers a significant cultural opportunity for the City to acknowledge Aboriginal history and to incorporate a strong visual identity throughout the site. The inclusion of an Aboriginal Culturally Informed Zone should not be tokenistic but needs to be a key element developed through deep and meaningful engagement with the Tasmanian Aboriginal Community.

For this project to move forward in a manner respectful to the Tasmanian Aboriginal Community, any further design elements must be developed through culturally appropriate engagement directly with the Tasmanian Aboriginal Community.

3.1.3 Multipurpose Stadium and Associated Concourse Zone

- Council notes that the international and national stadium precedents referenced in this section (Figures 24 – 27) are all focused on 'event day' which the business case for the stadium nominates as 44 days per annum.
- We note that the precedents are potentially misleading as they do not acknowledge the context. All precedents are in cities which are substantially bigger with St Louis' urban area containing 2.8 million people and Sydney over 5.5 million people.

- We also note that it's interesting to see the Entertainment Quarter (EQ) as a precedent, given the EQ retail/ground plane has struggled hugely over the years despite ample parking, movie studios, a film and TV school, cinemas, and other mixed-use developments and being in city of over 5 million people.
- Moreover, Barangaroo is shown a fine-grain example however it has more than 20,000 workers right above in the commercial towers yet struggles on the weekends namely the waterfront is open, but the lane cafes are closed.
- To properly interrogate these precedents, we would suggest comparative figure ground drawings (or aerials at scale) to see the actual structure of each place and how they relate or not relate.
- It is also of major concern to Council how the stadium will be fully integrated with the wider precinct for the remaining 321 days of the year. This critical issue needs to be addressed in the final Precinct Plan.

3.1.4 Antarctic Facilities Zone

As an Antarctic Gateway City, Council sees the realisation of more consolidated co-located Antarctic facilities as critical to increasing the sectors capabilities and capacity to expand the provision of research, administration, logistics and supply services not just to the Australian Antarctic Program but also to meet the increased demand of such services from our international customers. It is also a significant opportunity to increase community exposure and engagement with the important work of the sector. The value of public facing elements included within the Antarctic facilities zone cannot be underestimated as a means to further community and business understanding of the internationally important work undertaken here in Hobart and the local capabilities and workforce that supports it.

The precinct will also offer synergies in facilities and services provided alongside the Ice Core facilities and expanded air operations proposed for the Hobart Airport redevelopment and allow improved coordination of these services as part of our competitive advantages as one of five Antarctic Gateway Cities globally.

Council is pleased that the critical upgrades to Macquarie Wharf 6, as the home berth of *RSV Nuyina*, has been included in Stage 1 delivery of the Precinct. City of Hobart will continue to support the high prioritisation of this throughout the delivery of the Precinct development.

3.1.5 Complementary Integrated Mixed-Use Zone

Arts and culture are only mentioned in this section with reference to the zone "affording spaces and places for making and displaying arts and crafts". This statement does not accurately capture the results of the consultation with the cultural sector that was facilitated by Inkhorn, the project consultants, which suggests the inclusion of the following elements:

- an iconic 'arts' development
- a contemporary music hub
- a children and family friendly facility
- a creative makerspace
- a gaming and enterprise / digital screen hub
- a concert hall / prestige capacity performance venue

"Arts and crafts" has a strong visual arts focus which does not address the needs of the broader sector, or include industries such as performance and music.

The inclusion of a facility or dedicated space that is designed to encourage engagement and participation by families and children is a key element that would promote ongoing activation of the precinct. Council recommends the Plan include reference to the broader arts sector rather than having a narrow focus on arts and crafts to ensure the economic and social benefits of this sector are adequately recognised for its significant potential to activate the precinct outside of 'event day' activity.

3.1.6 Residential Development and Public Foreshore Zone

Council holds reservations regarding the suitability of the location of the proposed residential development at the Regatta Grounds. This location, adjacent to the Cenotaph, the Port Secure Zone and the proposed Commercial Uses Zone is effectively cut off from the active, urban parts of the city and its retail amenities, transport linkages and services. While the views of the river are considered to have great natural amenity, it is suggested that future residents in this configuration will be somewhat isolated from the CBD and the remaining Mac Point Precinct.

Moreover, from a land use planning perspective, it is not best practice to locate a sensitive land use such as residential development directly adjacent to a 24-hour working port that is secured, lacks night-time surveillance and may cause amenity issues such as light spill and noise pollution. The potential for land use conflict, safety and amenity concerns between these incompatible uses need to be carefully resolved.

Council also questions whether the amount of housing proposed, which is yet to be determined in any detail in the Draft Precinct Plan will be of a sufficient scale to provide substantial activation of this area to make it a location suitable for residential development.

While Council is a strong advocate for increasing opportunities for social and affordable housing, including for key workers, the designation in the Plan of the housing for 'health workers' appears to be short sighted and overly prescriptive.

Council would be willing to work with MPDC to identify more suitable locations in the Hobart LGA for residential development that are close to retail amenities, transport connections, and services that are more commensurate with high amenity urban settings.

3.2 Macquarie Wharf

Council recognises the strategic importance of Macquarie Wharf to the state and local economies and all the existing uses that will need to be maintained and enhanced through the development of the precinct.

The boundary between the Port Secure Zone and the adjacent zones, in particular, the Mac Point Site Zone, as detailed previously, require careful consideration to ensure all uses can function efficiently and cohesively. We look forward to seeing further resolution of the ground plane and further detail around the proposed road network and accessibility for all users.

Furthermore, given the secure nature of the Port Secure Zone, we would question as to whether coach parking and lay over spaces is appropriate to be considered in this area as indicated in the WSP Event Day transport Summary shown in *Figure 04: Event buses shown in Secure Port Zone*.



Figure 04: Event buses shown in the Secure Port Zone

3.5 Moving to, around and through the site

General comments

There is no access to/from the east of the site, due to its adjacency to the River Derwent. This will limit the effectiveness of providing an even distribution of access points around the stadium's perimeter, which often supports efficient ingress and egress operations.

The topography between the Cenotaph and the proposed stadium site may limit the opportunity for connection between these areas. This could be an important connection though, as it:

- would provide access to the open Cenotaph site which may be necessary to support emergency egress operations of the Stadium, and
- provides connection to the Bridge of Remembrance which provides safe pedestrian crossing over the Tasman Highway to/from Queens Domain.

The pedestrian paths currently over the Tasman Bridge are incredibly narrow, offer little separation from vehicular traffic and are not suitable for high crowd flows. The length of this route would be in the order of 3km which is likely to exceed the physical ability of some people. It is acknowledged that it is the intension of the State Government to upgrade these paths with a significantly improved offering over coming years which will address the capacity and amenity issues that currently exist.

Davey Street, Macquarie Street and the Tasman Highway present a significant impediment to pedestrian movements between the Inner North-East Precinct and Hobart's CBD. Crossings exist at their intersections with Evans Street and the Brooker Highway, however increased attraction to the precinct would require careful assessment of the suitability of these existing intersections. This becomes particularly critical during ingress and egress operations of an event day with 30,000 attendees.

The pedestrian network throughout Central Hobart is generally 'narrow' relative to the possible crowd demands of a 30,000+ stadium. This in combination with the lack of separation between most footpaths and vehicle carriageways presents a significant security and safety risk. "Last mile" capacity assessments should be included in any pedestrian modelling.

3.5.1 Transport

The addition of a new stadium precinct which will become a major trip attractor on the edge of the heart of Hobart's Central Business District (CBD) represents a significant opportunity to establish new norms of how we travel to and interact with the CBD. The City welcomes the opportunity to provide comment on the proposed transport concept, noting in particular the chance to provide high-quality pedestrian and bicycle connections through and to the development site and enhancing connectivity with the CBD.

Council recognises that the Draft Precinct Plan presents an initial overview of the concept and proposal only, and that further detailed modelling and planning work will subsequently be undertaken. It is also acknowledged that working with key stakeholders has been identified as a key next step. The City of Hobart has previously been engaged in discussions with the Department of State Growth regarding the site and is keen to provide input into the next phase of the project.

3.5.2 Accessibility

Council notes that Macquarie Point is located a considerable distance from existing public transport services and is not within easy walking distance for people with mobility limitations. As such, the provision of adequate accessible transport, parking and drop off facilities are critical.

Moreover, the large and fragmented nature of the site means that consideration of accessible paths of travel and clear wayfinding are significant factors needed to support people to navigate the area safely.

Council advises that all new facilities need to be built with universal design principles at the forefront with best practice assistive technology integrated into the design.

We welcome the opportunity to discuss these concerns in more detail, particularly when assessing travel distances from accessible drop-off zones and more general conversations around the widths of the proposed concourses expected to wrap and weave through the precinct.

3.6 Event Day Transport

Council understands that 'event day' transport is a complex area of planning and many details are yet to be resolved such as significant further modelling and planning work. The City will provide further comment as further detail becomes available.

3.6.1 Guiding principles

The guiding principles in this section are supported. However, Council suggests that the principle to 'leverage existing and future transport provision' may be compromised by the lack of consideration given in the Draft Precinct Plan to the potential for a future public transport corridor located broadly along the former railway line alignment. The City considers maintaining this corridor of significant value to not only the site but to the future transport needs of Greater Hobart.

Council notes the Draft Precinct Plan does not propose any new public car parking. As such Council wishes to highlight the following impacts on the road network and the City's parking facilities that further consideration:

- Carparking which will be used across the CBD and in the Domain area will require extensive pedestrian connectivity upgrades beyond the stadium precinct for anticipated pedestrian surge loadings back to carparking areas.
- The Hobart Regatta grounds will continue to be used for parking (over-flow parking) when larger events are being held in the Hobart CBD or in the surrounding areas. Suitable vehicular access onto the green space to enable this parking activity to occur, and the ability for shuttle buses to service the site (without need to drive on the grassed surface) will need to be considered.

3.6.3 Transport Infrastructure and Staged Implementation

Council supports future transport infrastructure being brought forward such as the delivery of the proposed Rapid Bus Network and upgrades to walking and cycling infrastructure. Integration of public transport services with event days should include extensive communications and incentives to promote public transport use, such as free travel. The City would like to see the provision of a high-quality pedestrian and bicycle connection between the existing intercity cycleway (north of the proposed northern access road), and the Hobart Waterfront, either past or through the development site, with particular consideration of:

- ensuring high-quality connections of this pedestrian and cyclist connection and the Macquarie Point site
- maintaining suitable access to this connection on event days including during event setup, progress and pack-down.

3.6.4 Transport Concept and Road Infrastructure

Council makes the following comments with regard to:

The Northern Access Road:

- The design of the new Northern Access route, to cater for potential heavy vehicle traffic, will need to consider amenity and safety of pedestrians and cyclists accessing the area.
- Notwithstanding the above, the Northern Access Road, if not carefully designed, may alienate or sever access from the Cenotaph to the Derwent River edge. Providing land bridges and /or considering how the road can function as a high-amenity space/concourse may alleviate some of these concerns, however Council welcomes

further opportunities to review the design in greater detail at MPDC's earliest convenience.

Cycling corridors:

• Further work is needed to resolve pedestrian/vehicle conflict through the precinct, for instance, the major cycling corridor crossing through the events bus hub.

Pedestrian corridors:

- The connection along Davey Street would require further widening and enhancement along this shared zone corridor, on the basis of existing desire lines. It is considered that facility separation may be a better outcome at this location during major event times.
- the pathway along the Tasman Highway from the Cenotaph and the Domain is not well considered, particularly for event day crowds.

Bus transport:

• The major stop locations around the Tasman Highway/Brooker Highway may present issues for loading/unloading, and further analysis and consideration will be required for traffic management as bus movements have potential for broader network disruption.

Other facilities:

- Access to the helipad on the Cenotaph will need to be considered, as level access for ambulances to transport patients to and from the helicopter is needed. This could be achieved by consolidating access to the Regatta Ground, Regatta Pavilion, Cenotaph and helipad closer to the existing access to the Regatta Ground.
- The relocation or installation of new public toilets at a convenient and accessible location adjacent to the corridor may be required. Planning for the replacement of the public toilets in its current location had commenced by the City of Hobart. Given the uncertainty of the final road configuration in this location the replacement of these toilets has been put on hold and the project funds for the replacement have been transferred to other projects.

Conclusion

While Council appreciates the conceptual nature of this Draft Precinct Plan, the lack of detail throughout makes it difficult to assess future potential impacts of development envisaged by this Plan on the wider area. For instance, there are no sections provided so the challenge of how the proposed development interfaces with the Cenotaph head land is unclear and underrepresented in the Plan. This has implications for the height and views of the stadium, the remote nature of the residential development and the impact created by the northern road.

Council welcomes further opportunities to meet with MPDC and the project consultants to review our feedback and concerns. The significant investment in City infrastructure required to support the precinct on an everyday basis and in 'event' mode will require careful planning and capital investment and will need to be factored into the project at the precinct planning stage.

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 faithfully,

Neil Noye DIRECTOR CITY LIFE