

13 June 2025

The Hon. Jeremy Rockcliff
Premier
Minister for Trade and Major Investment
Department of Premier and Cabinet
GPO Box 123
Hobart Tasmania 7001

Dear Premier,

My submission to the Planning Commission was #482 dated 28 April 2025.¹

Proposed Hobart Stadium Legislation

Thank you for the opportunity to comment on the *Macquarie Point Planning Permit Bill 2025* as well as related documents, including the -

Draft Macquarie Point Planning Permit (Draft Project Permit), the Draft Macquarie Point Planning Permit (Draft Project Permit), Draft Macquarie Point Multipurpose Stadium – Enabling Legislation Report, and Summary of observations.

As the draft ‘*Enabling Legislation Report*’ is “supported by a range of supporting documents that have been supplied by Macquarie Point Development Corporation,” it appears there is also an implicit invitation to comment on these documents, as well.

These have been categorised as -

Project supporting documents

- Planning Matters

- Transport

- Heritage

- Environmental

Consolidated Set of Plans

- Stadium Plans (referenced in the Permit)

- Other Plans and visualisations

Other supplementary information

- Economic Analysis

- Mac Point Precinct Plan

 - Aboriginal Heritage

 - Environmental

 - Other Planning Matters

 - Background

Project of State Significance key documents

including -

The Matter of the Macquarie Point Multipurpose stadium integrated Assessment under the State Policies and Projects Act 1993 Representation 3 on Behalf of the Proponent as well as

¹ <planning.tas.gov.au/__data/assets/pdf_file/0020/810461/Representation-482-Anonymous-28-April-2025.pdf>

“Other documents relevant to the consideration of this project as a Project of State Significance [available on] the Tasmanian Planning Commission’s website.”

Planning Commission Process

I am dismayed that your government has decided to circumvent the Project of State Significance process as the commissioners and delegates of the Tasmania Planning Commission appear to be of eminent character and are well qualified and very experienced in relevant matters.

These include, as you know, Urban Planning, Law, Economics, Geography, Architecture, Environment and Utilities.²

At the very least, the panel should have been entrusted to complete their independent assessment of the proponent’s stadium application.

Firstly, I am concerned that your government may have been unaware of competing deadlines.

The Planning Commission published a note on 17 April 2025 stating that public hearings to discuss representations made by members of the public were scheduled for 30 June 2025 to 25 July 2025.³

This seems appropriate as it appears there is widespread interest in the proposed stadium, especially if written representations to the Tasmania Planning Commission are any guide.

It appears there were 548 representations regarding the draft assessment guidelines and an additional 1,338 representations about the draft assessment (including 476 ‘online’ forms). This totals **1,886** representations.

Further to this, the Commission notes that its ‘Integrated Assessment Report’ is due to be submitted to the Minister, who I understand to be your person, by 17 September 2025.

At the same time, however, you, as the accountable Minister, signed the *Club Funding and Development Agreement* on 3/5/23 which at *Schedule 12 Statutory Approvals* states an “End date for satisfaction of relevant Statutory Approval”⁴ of

30 June 2025 Obtaining all relevant planning and environmental approvals for the Stadium Construction Activities...

30 June 2025 Public works committee approval secured (Stadium)

30 September 2025 Appropriation of funds for entry into the Stadium Construction Contract...

I am concerned that your government may not have been sincere in requesting the Planning Commission to undertake an independent integrated assessment report, including based on representations of the public, if your government knew earlier that 30 June 2025 and 30 September 2025 were, in effect, “sunset” dates to fulfil conditions of a legal contract signed with the AFL.⁵

2 <planning.tas.gov.au/about-the-commission>

3 <planning.tas.gov.au/__data/assets/pdf_file/0007/806704/PoSS-assessment-stages-explained-17-April-2025.pdf>

4 Presumably meaning 3 May 2023 and not 5 March 2023 (as an American may read it).

5 <stategrowth.tas.gov.au/news/archived_news/tasmanian_club_funding_and_development_agreement> Accessed 8 June 2025 see point 5 p. 101 [License Agreement].

I note the *AFL Licence Taskforce Business Plan* is dated 18 December 2019.

On this, your government published:

“The requirement for the Stadium to have a roof was identified in the *AFL Licence Taskforce Business Plan 2019...*”⁶ This assertion was repeated on camera by AFL CEO Andrew Dillon on 10 June 2025.⁷

It appears the Taskforce [comprising eight ‘project team’ members) did not identify a ‘requirement’ but rather an aspiration. They also admitted it was “outside its Terms of Reference.”⁸

Upon ‘proof of concept’ [ie. a renovation of York Park], a longer-term aspiration should be a **roofed, CBD-based ‘Adelaide Oval’ multi-purpose facility developed for Hobart** to share all AFL content and opportunities with Launceston [original emphasis].⁹

Public Participation

By seeking to remove this proposal from the purview of the Planning Commission, it appears your government is not against limiting public participation, including in presenting evidence to the Planning Commission.

While some deride such opportunities as ‘red tape,’ I think this democratic process sets Australia apart from many other countries, and specifically the idea that the Executive in the Westminster system (by way of delegated authority) is truly prepared to listen to its constituents as it contemplates properly investing substantial sums of taxpayer money.

I look forward to reading the submissions of others and hearing their evidence, including that of local institutions.

I think any attempt to circumvent this process is alarming because it appears to be autocratic. This is a mega project that will have financial reverberations for generations.¹⁰

The idea of parliamentary delegation is surely so that specialists can be tasked with applying their knowledge; I expect the work of parliament may grind to a halt if every parliamentarian was required to scrutinise 5,000 pages of specialist work every time they voted in the chamber.

Autocratic decisions are, to my mind, analogous with inefficiency and mediocrity. They may inadvertently foster a plethora of injustices and may suppress the constructive contributions of those with specialist knowledge or experience. They may also fail to listen to those people who, in this matter, ultimately have to live with the stadium and to pay for it. Inefficiency hides a future cost.

6 <tas.gov.au/dpac/macquarie-point-multipurpose-stadium-consultation?_kx=RXTtOL9g9aIqQTWK0h9PEILgdSrH9l9pXqz3sk1zU0oylXAcpc4U4Y_nIeD-E5Nn.TidPmQ> at FAQ question: *Have efforts been made to renegotiate the deal and ensure we get the Devils teams regardless of the third stadium outcome?* Accessed 12 June 2025

7 ABC Television news. See also <theage.com.au/sport/afl/afl-live-2025-australian-football-hall-of-fame-class-of-2025-to-be-unveiled-20250610-p5m6an.html>

8 *AFL Licence Taskforce Business Plan 2019* p. 15

9 *AFL Licence Taskforce Business Plan 2019* p. 12

10 Defined as a project costing more than \$1 billion.

It is concerning that the State Government is reportedly considering this action as it does not accord with the *Tasmania Planning Commission Act 1997* Schedule 1

1. The objectives of the resource management and planning system of Tasmania are -
 - (c) to encourage public involvement in resource management and planning;
 - (e) to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.

Further, it does not appear to accord with the *Macquarie Point Development Act 2012*

7. Functions of Corporation

- (d) to consult with the Tasmanian community...

And it does not appear to be sympathetic with the *Sullivan's Cove Planning Act 1995, Schedule 2*

The objectives of the planning process established by this Act are –

- (a) ...to provide a mechanism for public involvement in the planning and development of Sullivans Cove.

Any action by the Tasmania State Government to ignore this special planning process *that it instigated* would surely be vulnerable to being declared *Ultra Vires* as the State Government has oversight of the proponent, the Crown in the Right of Tasmania.

Such as action would also arguably be vulnerable to permanent injunction as it is arguably in disharmony with the spirit of the *State Policies and Projects Act 1993* as well as the *Tasmania Planning Commission Act 1997*.

Mandate

I never thought I would see the day when I would agree with anything that the ‘Shooters, Fishers and Farmers Party’ said but Mr. Steve Loring made an excellent point and that was that your “minority government lacks a legitimate mandate to proceed with a project of this scale and fiscal significance [and that] it is untenable to assert that such an administration possesses the authority to commit to an undertaking with profound long-term financial implications for the state.”¹¹

As the Premier of a minority government you were not preferred as leader of the state by the majority of Tasmanians at the March, 2024 election and so your decision to circumvent the Project of State Significance process is, in this light, particularly egregious.

Right of Appeal

The proposal at the *Macquarie Point Planning Permit Bill 2025* s. 34 “Limitation of rights of appeal” appears to be very alarming. Specifically at subsection 1:

- (a) a person is not entitled to appeal to a body or other person, court or tribunal; and

11 Planning Commission Online Representation #61

<planning.tas.gov.au/assessments-and-hearings/current-assessments-and-hearings/macquarie-point-multipurpose-stadium-integrated-assessment/exhibition_root/form-representations/maq-print?maqid=805801&repno=61>

My only concern is Mr. Loring’s use of the word ‘Administration,’ instead of ‘government’ but this appears to be an affectation towards the United States that is regrettably popular in the mainstream Australian media.

(b) no order or review may be made under the Judicial Review Act 2000; and

(c) no declaratory judgement may be given; and

(d) all rights in respect of the seeking, granting or enforcement of injunctions, under any Act or common law, are extinguished; and

*(e) no other action or proceeding may be brought –
in respect of any permit issued, or any thing done, in good faith, under this Act or in accordance with this Act.*

And subsection 2:

For the purposes of subsection (1), any thing done under this Act, or in accordance with this Act, includes any action, decision, process, matter and thing arising out of or relating to –

(a) a term or condition of a relevant permit requiring that a person apply for such other permits, licences or other approvals as may be necessary for the proposed development; or

(b) the amendment of any relevant planning scheme or special planning order in accordance with this Act; or

(c) an action, decision, process, matter or thing made, or refused to be made, under another Act as authorised under this Act.

To even propose to remove a right of appeal is to sully democratic values, impede democratic deliberation and treat Westminster conventions with derision and contempt.

To propose to extinguish the freedom to even “seek” an injunction is authoritarian, immoral, and arguably unconstitutional.

And to propose at s.34 1(e) that “no other action or proceeding may be brought” appears to be draconian, oppressive and shortsighted. There is no considerations of potential ramifications.

By this proposal, for example, any worker injured during any construction would appear to have no legal recourse whatsoever.

The proposal equates Australians subject to Tasmanian law, at least in regard to the AFL stadium, with citizens in countries with nascent rule of law such as Afghanistan, Haiti and Somalia.

The corollary is that the Minister accountable for the proposed stadium would have powers virtually equivalent to a dictator, whether benevolent or otherwise.

The proposed s. 34 subsection 1 and 2 appear to be an instrument to suppress all dissent. This suggests that the AFL stadium-club proposal is fundamentally flawed because formal legal dissent is expected.

Roof Design

I think it is remarkable that so much preparatory work has occurred before the incompatibility of two major sports, Australian Rules (AFL) and cricket, both using this venue was addressed.

The shadows cast by the relatively lightweight translucent roof appears to still be a practical problem for cricket batters, in particular, that will inevitably dilute stadium revenue predictions, if either cricket or AFL does not become an ongoing ‘anchor’ tenant.

There unresolved difficulties, regarding the preliminary roof design, may be summarised as -

- * Cricket use concerns (thereby limiting potential stadium revenue);
- * The engineering challenge of a unique design (magnifying the risk of serious budget inflammation);
- * Inadequate rainfall drainage (as storms of intense rainfall increase);
- * Insufficient data regarding the strength of roof material in hailstorms and wind or its (potential) weaknesses in the event of fire;
- * And so, subject to design modification, unknown visual obstruction of historic, urban, cultural and environmental sight lines.

This factors will surely increase the cost of the project given that any loans beyond the \$375 million ‘funding cap’ will likely be paid down more slowly.

It remains unclear why the AFL has stipulated that a nineteenth team license will be granted to Tasmania only if, among other conditions, that a roofed stadium at Macquarie Point is built.

As far as I am aware, the VFL-AFL has never demanded this of any other club in the history of the league for 130 years, since 1895, including even defunct clubs such as University, Fitzroy or South Melbourne.¹²

The only AFL venue with a roof is Docklands and it’s problems with maintaining a natural grass surface have often been reported. *The Age* Chief Sports Columnist Greg Baum says the “surface is so hard it hurts [and that] grass doesn’t grow there.”¹³

This ‘hardness’ may be due, in part, to a carpark being built under the stadium. It is understood that a similar design is proposed for the Macquarie Point stadium (and that the AFL previously insisted on a car parking “allowance” of “approximately 40 spaces”¹⁴ while the proponent’s 2025 submission suggests 70 carpark spaces should be reserved for the club).¹⁵

It appears one partial solution at Docklands Stadium has been to install about 2m of artificial grass around the inner perimeter of the ground but this even harder surface appears to have increased the risk of player injury, especially concussion, when players are, for example, tackled over the boundary line.

Richmond coach Damien Hardwick said he “hate[s] coming [to the Docklands]”¹⁶ and the Victoria government spent about \$225 million to “upgrade” the stadium and “enhance fan experience.”

12 The AFL may argue, legally, otherwise but when a ‘club’ is moved interstate from its fans, it is deceased in all but name.

13 <theage.com.au/sport/too-marvellous-to-be-true-20190607-p51vkn.html> Accessed 7 June 2025

14 *Club Funding and Development Agreement Schedule 10 Stadium Specifications* 1.(c)(i)
https://www.statelibrary.tas.gov.au/news/archived_news/tasmanian_club_funding_and_development_agreement

15 Car Parking and Access Review Traffic Engineering Report SALT p. 12

16 <archive.sen.com.au/news/2021/05/16/hate-coming-here-hardwicks-frank-assessment-of-marvel-stadium/index.html> Accessed 7 June 2025

It appears that the AFL, acting on behalf of the current 18 club presidents, wants to remove the natural advantage that a Tasmanian team would have and that is the comparatively cold and blustery natural elements.

It appears the presence of a roof also reflects an unattractive corporate mindset. An AFL review suggested that the “weather” affected “product quality”¹⁷ which appears to reflect a belief that television viewers (and so broadcasters) prefer to watch rapid play.

This was arguably a superficial opinion as ‘Australian Rules’ is arguably loved by thousands of spectators exactly because the shape of the ball and its use outdoors in the elements ensures play is largely unpredictable. There is, or at least was, a balance between skill and chance.

Sadly and understandably, the more the AFL tries to ape indoor basketball, the less popular it becomes, at least in Tasmania where many male Aussie Rules teams have faded into memory.¹⁸

The removal of the natural elements arguably promotes a soulless, anesthetising experience for players and supporters, and Hobart arguably does not need or want this. AFL matches played indoors at the Docklands are indistinguishable and so unmemorable and Hobart’s reputation would suffer too, as a result.

The *Club Funding and Development Agreement Schedule 11* at 2.1 stipulates that “the Tasmanian Government intends to build the Stadium at the Macquarie Point site to a standard suitable for hosting AFL matches...”

It is understood that both York Park, Launceston (2001-) and Bellerive Oval (2012-) have been hosting AFL matches for more than a decade and neither stadium has a roof.¹⁹ This standard has been acceptable to the AFL in Tasmania for more than 20 years and it remains an acceptable standard throughout all mainland AFL venues, except the Docklands in central Melbourne that the AFL owns.

The AFL even schedules matches in Alice Springs [Mparntwe], Ballarat, the Barossa, Bunbury, Cairns, Canberra, Darwin, Mt. Barker and Norwood. These outdoor venues all surely have modest facilities so it is presumed the AFL schedules matches in these cities to engender community spirit and promote community participation.

Jaws

Curiously, this ‘regional’ approach does not align with the comments of Jaws Architects who “have provided conceptual and thought leadership on a Macquarie Point stadium.”²⁰ They posit -

“If we [Hobart] want world class teams to play here, we should have a world class stadium.”

It is surmised that a world class team is a successful, embarrassingly wealthy one which has a large number of international supporters, such as Manchester United or the LA Lakers. It is difficult to

17 *AFL Licence Taskforce Business Plan 2019* p. 16 Available <tas.gov.au/__data/assets/pdf_file/0024/439530/AFL-Licence-Taskforce-Business-Plan-2019.pdf> Accessed 8 June 2025

18 <theage.com.au/sport/afl/i-love-tassie-footy-and-we-need-a-team-but-the-afl-s-stadium-ultimatum-takes-a-special-kind-of-arrogance-20250609-p5m5x8.html>

19 *AFL Licence Taskforce Business Plan 2019* p. 35 Available <tas.gov.au/__data/assets/pdf_file/0024/439530/AFL-Licence-Taskforce-Business-Plan-2019.pdf> Accessed 8 June 2025

20 *AFL Licence Taskforce Business Plan 2019* p. 56 Available <tas.gov.au/__data/assets/pdf_file/0024/439530/AFL-Licence-Taskforce-Business-Plan-2019.pdf> Accessed 9 June 2025

imagine any ‘world class’ team agreeing to play even a practice match in Hobart if the stadium did not have a capacity of 100,000 people and they did not receive a guarantee of lucrative remuneration.

No AFL team can be considered ‘world class,’ even in Australia, as the skill level of the average AFL game has arguably declined further since two additional teams, Gold Coast (2011) and Greater Western Sydney (2012), entered the League.²¹

The most recent example of this was the West Coast versus North Melbourne match in Bunbury where the standard of play was so mediocre that *both* teams would have struggled to defeat an average VFL team that day. This was despite fine weather, an excellent surface, a live television broadcast, and an interested crowd.

The West Coast half-time score was a lamentable 1.8²² against a team that itself, <afl.com> reminds us, is 1000:1 to win the premiership.²³

It is a damning indictment on contemporary Australia that both competing coaches probably have an *annual* remuneration of about \$1 million, that every player on the field in Bunbury was paid at least \$100,000 per year and the average annual remuneration of a player who plays at least one match per season is \$493,000.²⁴ Meanwhile, NSW junior doctors receive about \$76,000 per year.²⁵

Apparently, these remarkable levels of remuneration are not sufficient in themselves to retain “playing, coaching and administrative talent” in Tasmania and, according to the AFL, a “clean, roofed stadium” is also required.²⁶

Further, the AFL taskforce suggested that because “most of the playing roster [of a Tasmanian team] would be “from the mainland states” that “**Hobart would be the likely team base.**”²⁷ [original emphasis].

It appears the wishes of Tasmanian fans may have been ignored when the Hobart proposal was adopted. To be induced to move to Tasmania, one hour from Victoria, a male player must apparently be offered, at least, an annual salary of \$500,000, daily access to a modern gym, and matches in a roofed stadium in the capital city.²⁸

The *Club Funding and Development Agreement* does not appear to stipulate that male and female Tasmanian players enjoy equal remuneration and that any criteria used to determine their remuneration grade are the same and are applied fairly and consistently.²⁹

21 *AFL Licence Taskforce Business Plan 2019* p. 43 Available <tas.gov.au/__data/assets/pdf_file/0024/439530/AFL-Licence-Taskforce-Business-Plan-2019.pdf> Accessed 8 June 2025

22 <afl.com.au/afl/matches/7075#match-report>

23 <afl.com.au/ladder?Competition=1&Season=73&Round=1160>

24 *AFL annual report 2024* p. 45

25 <parliament.nsw.gov.au/tp/files/190630/More%20GPs%20and%20Pay%20equality%20for%20NSW%20Junior%20Doctors%20-%20Lane.pdf> Accessed 9 June 2025.

26 *AFL Licence Taskforce Business Plan 2019* p. 16

27 *AFL Licence Taskforce Business Plan 2019* p. 12

28 The profligacy of the AFL and disdain for inauspicious and unnecessary risk was in evidence again when a Melbourne player signed a nine-year (total) contract until 2034. <melbournefc.com.au/video/1803506/faith-in-the-future-pickets-long-term-deal?videoId=1803506&modal=true&type=video&publishFrom=1749702294001>

29 There are redactions which are anathema to democratic deliberation and morally unwarranted as there is no other commercial competitor in this instance.

Tasmanian Premiers, recent and present, are understood not to have made any commitment to salary equality.

“World class stadiums don’t belong in the suburbs.”

This appears to be an elitist, condescending view of ‘the suburbs.’ It is agreed that industrial buildings such as stadia should definitely not be built in proximity to residential neighbourhoods.

It would be a poor allocation of resources, especially considering how little stadia are used on a daily basis.

“I don’t think expanding both Blundstone Arena [Bellereve] or UTAS Stadium [York Park] is a good long-term strategy. Congestion, car parking and noise are already issues which impact both spectators and residents.”

This appears to be an ironic statement considering the proposed Macquarie Point stadium is more likely to cause pedestrian- and traffic- congestion while the noise generated by football matches and concerts at Macquarie Point will be worse than even the most popular North Melbourne match at Bellereve. It appears the *Noise Assessment* did not consider motor-cross and ‘Monster’ trucks.³⁰

“Like Adelaide Cricket Ground (sic) or the MCG, a world class inner-city stadium is far a better proposition.”

The Adelaide Oval and Melbourne Cricket Ground have been developed by the respective state governments over more than a century. Both mainland cities interposed their football ovals on indigenous country that enjoyed an abundance of relatively level, thinly-forested land.

Even today, despite the inexplicably high price of land in Melbourne, the MCG sits contentedly within sizeable parklands.

Hobart is and will always be constrained by its topography, at least by comparison. That is its blessing. A “world class” stadium would be inappropriate for “inner city” Hobart even if the AFL was to accept the full invoice. The history, climate, demography, city wealth, personal wealth and the regional size of Hobart (happily) does not compare to Melbourne, or even Adelaide.

To misquote Alan Jeans, Tasmanians are not willing to pay the full price.³¹

“It turns a night out at the footy into a ‘night out’. Football becomes one part of the evening’s entertainment. Spectators will make better use of public transport hubs, including the proposed light rail, in venturing into the CBD for pre or post-game meals or bars and other activities.”

For the vast majority of supporters, whatever the capital city, it is contentious to suggest that a ‘night out’ at the footy becomes ‘part of an evening’s entertainment.’

Night matches usually finish after 10pm so it is arguable that the vast majority of spectators return home directly. It is likely there is limited desire to dine at that late hour, especially as the public transport system, in Melbourne at least, is untrustworthy and crowded.

30 AECOM *Project of State Significance Vibration and Noise Assessment*

31 Hawthorn coach Alan Jeans reportedly asked his team if they were willing to pay the full price during a recess at the 1989 Grand Final.

In Melbourne, the affluent may cruise home to Sandringham in a European marque from under the Arts Centre but the supporter of more modest means has to stand on the V-Line service until midnight and may not walk in their front door until 1am.

Anyone taking a (very crowded) rapid bus in Brisbane back to the city, might stop for a coffee at 8pm but is probably more interested in catching their train at Central, rather than enjoying a 'night out' (especially after sitting on a plastic seat for three hours).

In Hobart, the temperature at 10pm may also encourage supporters to return home and the constrained area at Macquarie Point indicates those with a 30min walk will arrive home earlier than people waiting for a vehicle.³²

Local business operators will surely prefer their custom is moderated and reasonably even, which is to say that a nightclub, art gallery, theatre, cinema, museum, skating rink, exhibition, festival, yacht race, toboggan or fireworks display may attract a steady stream of visitors constantly, every day.

A stadium, however, offers an overwhelming crowd perhaps, at best, once every fortnight (on an evening when many of the same people may be in the city anyway). Stocking, staffing and budgeting is surely easier with a steady stream of customers.

In a city the size of Melbourne, restaurants may be bustling on a Saturday night but to look closely at 6pm is to notice that relatively few patrons or passersby are actually wearing football memorabilia. Food and drink is sold at the football, apparently in very large quantities, while some spectators bring their own.³³

Any proposed light rail for Hobart should be built before the stadium, both as a technical proof-of-concept, proof of management expertise, and as proof of fiscal responsibility. It would provide a more productive return-on-investment (ROI), especially in regard to carbon emissions.

Indeed, Tasmania should first consider a light rail system from Hobart to Launceston as part of a wider strategy to address, especially, deficiencies in Health and Public Education. Hobart's last passenger train ceased operations in 1978 so this is not a revolutionary idea.³⁴

AFL Funding

In 2019, the AFL proposed to fund any new Tasmanian team at the average rate (2018) of all other AFL teams. This amounted to \$17.1 million.³⁵

AFL funding to clubs contains an 'equalisation' component, so to propose to fund any Tasmanian team the average amount appears to be unfair given several other clubs, all established, would receive more money each year.

32 <abc.net.au/news/2025-04-01/macquarie-point-stadium-scrutinised-tasmania-planning-commission/105119430>

33 Some people with a vested interest are apparently already expressing an interest in selling food at a Hobart stadium.

34 Excepting the West Coast tourist railway and the modest, bespoke Don River railway carriage.

35 *AFL Licence Taskforce Business Plan 2019* p. 46 Available <tas.gov.au/__data/assets/pdf_file/0024/439530/AFL-Licence-Taskforce-Business-Plan-2019.pdf> Accessed 9 June 2025

Funding dollars -

2018 AFL Report	2018 Club Report	2023 AFL Report	2023 Club Report ³⁶
Brisbane 22.3m	23.6m	27.724m	27.440m
Gold Coast 22.8m	23.9m	33.114m	28.859m
GWS Giants 22.7m	24.7m	32.494m	32.179m
St Kilda 19.1m	20.5m	24.736m	23.297m
Tasmania 17.1m³⁷			

It appears these figures cited in the 2018 AFL annual report are lower than the figures reported by the respective clubs in their annual reports in 2018 while in 2023 it appears the AFL overstated its 'distributions' to these four clubs, at least according to their respective annual reports for that year.

There were, at least as of 2019, 'Other distributions' made to clubs which may explain why the AFL Tasmania Taskforce noted that the GWS Giants received \$24.7 million in 2018 while the Gold Coast received \$23.9m.³⁸

According to the Gold Coast 2018 annual report, it received \$23.696,768 in "grant income," some \$203,000 less than the figure quoted by the AFL Tasmania Taskforce.³⁹

Conversely, the Taskforce suggested the GWS Giants received \$24.7 million whereas the GWS Giants annual report listed \$25.682 million, a difference of about \$982,000. The difference between the AFL annual report 2018 and the GWS Giants annual report 2018 as to what it received is very close to \$3 million.⁴⁰

In a similar vein, the AFL annual report 2023 notes St. Kilda Football Club received \$24,736,000 whereas the St. Kilda 2023 annual report notes revenue from AFL sources was \$23,297,427, a difference of about \$1,438,000.⁴¹

The 2023 AFL club funding average was \$21,875,000⁴² although it is unclear if a Tasmanian AFL club would receive even this amount each year.

These apparent discrepancies continue, between the 2024 AFL- and respective club annual reports:

	AFL 2024 report (millions)	Clubs 2024 report (millions) ⁴³
Adelaide	19.690	18.803

36 *Brisbane Football Club 2023 annual report* p. 12 Available: <footyindustry.com/docs/Brisbane%202023%20Annual%20Report.pdf>

37 *AFL Licence Taskforce Business Plan 2019* p. 12

38 *AFL Licence Taskforce Business Plan 2019* p. 26 Available <tas.gov.au/__data/assets/pdf_file/0024/439530/AFL-Licence-Taskforce-Business-Plan-2019.pdf> Accessed 9 June 2025

39 *GCFC Annual Financial Report 2018* p. 18 Available: <footyindustry.com/docs/Gold%20Coast%202018%20Annual%20Report.pdf>

40 *GWS Annual Report 2018* p. 19 Available <footyindustry.com/docs/GWS%202018%20Annual%20Report.pdf>

41 *St. Kilda Football Club 2023 annual report* p. 23 Available <footyindustry.com>

42 *AFL annual report 2023* p. 147

43 The citations for the respective club 2024 annual reports are: Adelaide p. 25, Brisbane p. 12, Carlton p. 24, Collingwood p. 22, Essendon p. 26, Fremantle p. 29, Geelong p. 18, Gold Coast p. 15, Greater Western Sydney p. 15, Hawthorn p. 42, Melbourne p. 28, North Melbourne p. 17, Port Adelaide p. 9, Richmond p. 12, St. Kilda p. 22, Sydney p. 16, West Coast p. 31, Western Bulldogs p. 33

*GWS total includes 'match receipts'. See footnote next page. ** St. Kilda total includes 'AFL signage'

Brisbane	30.362	29.637
Carlton	20.526	16.523
Collingwood	21.941	16.040
Essendon	19.862	15.979
Fremantle	19.017	13.899
Geelong	19.240	17.438
Gold Coast	34.770	30.627
Greater Western Sydney	34.548	37.139*
Hawthorn	18.415	15.136
Melbourne	23.811	20.199
North Melbourne	26.357	24.391
Port Adelaide	22.576	21.024
Richmond	18.354	15.036
St. Kilda	26.102	23.765**
Sydney	24.299	22.765
West Coast	16.891	15.342
Western Bulldogs	23.876	21.509
Published Total ⁴⁴	420.816	
Actual total	420.637	375.242
Actual average	23.368	20.847

Unfortunately, it appears that the AFL had difficulty calculating an accurate total from its own figures while the amounts reported by each club in their respective 2024 annual reports all differed from the AFL 2024 annual report by more than \$45 million.⁴⁵

I am concerned that on the average funding (AFL ‘distribution’) that a new Tasmania club (and so the Tasmania Government that subsidises it), may be diddled by almost \$3 million (clubs’ reported average) or more than \$6 million (based on the AFL head office figure).

I am also concerned that the AFL, reported to be an ‘anchor’ tenant of the proposed stadium, either has apparently has lax accounting standards in head office and/or it accepts lax accounting standards from *all* of its 18 clubs.

None of the ‘distribution’ figures for any club 2024 annual report correlate with the *AFL 2024 annual report* and this may promote idle speculation. Such speculation may affect Tasmania’s ‘brand’.

Corporate Suites

The *Club Funding and Development Agreement Schedule 10* at 1(b)(i) stipulates that “the stadium must include... at least 1,500 corporate/ premium spaces which must include the capacity of at least 500 hundred (sic) spaces in corporate suites...at least 12 of which must have the capacity of at least 16

⁴⁴ *AFL annual report 2024* p. 155

⁴⁵ If these match receipts are the difference between the AFL and the club figures, then this total may have been \$2.591m or \$103,000 match day revenue per match, on average (including two finals). If tickets cost \$27, this equates to an average attendance of about 3,800 people (including the two finals). As of 31 October 2024, GWS club had financial liabilities of about \$13,523,000 (*GWS 2024 annual report* p.11) This appears to be a poor return on investment given that GWS plays a portion of its matches in traditional AFL territory each season (as ‘away’ games) that *should* increase its crowd size.

persons.” KPMG estimate this number as 1,392, almost evenly divided between Corporate categories 1 and 2.⁴⁶

It appears that mainstream media references to the venue capacity of 23,000 people and an additional 1,500 spectators in “standing room” apparently do not make it clear that these 1,500 people are in corporate “spaces” [and they may apparently choose to stand or they may choose to sit].

It appears that there may be as many as fifty corporate boxes catering to about 16 per cent of spectators with boutique, premium bar ‘galleries’ for 1,000 more people. This appears to be an injudicious number of suites, given that Greater Hobart reportedly has the lowest median total income in Australia.⁴⁷

The AFL’s apparent preference for premium comfort arguably does not align with the entire state of Tasmania where egalitarian community participation and family values are genuinely appreciated. Watching ‘footie’ from behind thick glass, in air conditioned surrounds with waiters on call, may be the (new) Melbourne- or Geelong- way but it is not the Tasmanian way.

It appears these corporate suites, including for the media, are a compulsory design requirement and contribute significantly to the total building height of 57 metres (the playing surface is planned to be 3 metres above street level).⁴⁸

Construction

The MCG is expected to start building a new Southern Stand in 2028.⁴⁹ Brisbane is expected to start building at least one new stadium for the 2032 Olympics.

Given the Christchurch stadium is expected to be finished in early 2026, I am concerned that the impetus for a Hobart stadium is actually being driven by Multinational construction companies who seek to fill in their decade-long work schedule.

It may resemble this: Townsville, Geelong, Christchurch, Hobart, MCG, Brisbane, Darwin.

In this regard, the AFL may be an innocent vector for construction companies, in the same way that FIFA-Olympics may be as well, in the global sphere.



46 KPMG Cost Benefit Analysis p. 8

47 <abc.net.au/news/2019-01-10/january-curious-hobart-wages-tasmania/10614430> Accessed 7 June 2025

48 Visual Impact Assessment Report p. 20and 22.

49 <footyindustry.com/index.php/afl-aflw/victorian-government-500m-funding-deal-with-the-afl/> Accessed 9 June 2025

The AFL accepted the recent Geelong upgrade of Kardinia Park without a roof (pictured). It is understood the Federal Government also contributed a lot more than \$240m (in 2012 dollars) to help pay for it.

It appears this particular stadium redevelopment may have been at the expense of local organisations such as Mildura Base Hospital and staff⁵⁰ and Victoria public schools and teachers.⁵¹

Financial Liabilities

I am very concerned that there are substantial additional liabilities to be incurred by the State Government of this project simply to get the Devils into their first match. These include:

1.	Roofed stadium	\$945,000,000	[plus Fed. \$240m] ⁵²
	Land value	(\$155,000,000)	[value of best alternative use] ⁵³
2.	Club headquarters	\$100,000,000 ⁵⁴	[plus AFL \$10m] ⁵⁵
3.	Land Kingston	\$	[value of best alternative use]
	Club headquarters refurbishment	\$	[once every five years] ⁵⁶
	Public Liability Insurance	\$	[annually] ⁵⁷
	Property Insurance	\$	[annually]
	Workers Compensation	\$	[annually]
	Club indemnity	\$ <i>risk</i>	[annually – death, injury, damage] ⁵⁸
	Signage rights income	\$ <i>waived</i>	[gifted to club] ⁵⁹
	GST not included	(\$)	[additional 10 per cent] ⁶⁰
	Depreciation	\$	
4.	Debt repayments	\$16,100,000 ⁶¹	[per year, for 30 years]
5.	Club operations	\$12,000,000	[per year, 12 years, or ‘long term’]
6.	AFL Crowd revenue guarantee	\$	[every AFL match played in Tas.] ⁶²
7.	Yield to amalgamation	(\$)	[with a mainland AFL club] ⁶³
8.	Stadium operations	\$ 7,848,000	[per year, for 30 years] ⁶⁴
9.	Event Inducements	\$ 8,000,000	[per year, for 30 years] ⁶⁵
10.	Site rehabilitation	\$	[heavy metals]

50 <theage.com.au/national/victoria/overwhelmed-by-demand-mildura-hospital-s-dire-warning-for-allan-government-20250606-p5m5hl.html> Accessed 10 June 2025

51 <theage.com.au/politics/victoria/teachers-to-protest-in-the-streets-against-school-funding-cuts-20250530-p5m3k8.html> Accessed 10 June 2025

52 Reportedly includes **\$65.5 million** in consultants fees.

<abc.net.au/news/2025-01-07/detailed-costs-revealed-hobart-proposed-macquarie-point-stadium/104787552>

53 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 88 It appears Mr. Gruen halved his first estimate of \$310 million due to “substantial controversy.”

54 <abc.net.au/news/2025-05-19/tasmania-devils-afl-high-performance-centre-delays-cost-blowout/105306576>

55 Known as a ‘Training and Administration (TA) facility’. Rent: \$1 for exclusive possession. *Club and Development Agreement Schedule 5* p. 43 (5.), p. 44 (7.1,7.2) for use “at all times.” See also Sch. 9. When (eventually) the contract AFL-Govt. contract is terminated, the state government must refund to the AFL this \$10 million. See 20.2(d) p. 22/67

56 *Club Funding and Development Agreement Schedule 5* p. 47/67 at 10.6 and p. 50/67

57 Of at least \$20 million per occurrence and to include legal liabilities. *Club Funding and Development Agreement Schedule 5* p. 47/67

58 *Club Funding and Development Agreement Schedule 5* p. 47-48/67

59 *Club Funding and Development Agreement Schedule 5* p. 49/67

60 *Club Funding and Development Agreement Schedule 5* p. 49/67 16.2 and 16.3

61 *KPMG Economic Impact Assessment* p. 8

62 *Club Funding and Development Agreement* 5.9(b) p.8/67 Yet if crowds exceed expectations, the Tasmania Government does not get to keep the difference. 5.9(c) p. 8/67

63 *Club Funding and Development Agreement* 12.1(e) p. 14/67 The club could legally be moved to Arden St., for example

64 *KPMG Financial Impact Report* p. 18 includes stadium maintenance, turf maintenance, wages, admin.

11.	Goods shed relocation	\$18,500,000	[historic] ⁶⁶
12.	Utilities works realignment	\$ 5,000,000	[sewerage, electrical, water, NBN] ⁶⁷
13.	Stadium carpark – 532 spaces	\$	⁶⁸
14.	Stadium commercial decorate	\$	⁶⁹
15.	Stadium technology	\$41,000,000	[CCTV, LED ads, PA, TV, 5G,] ⁷⁰
16.	Stadium signage	\$	[sponsor pays?]
17.	Stadium roof shadow ‘test rig’	\$	[to alleviate cricket concerns] ⁷¹
18.	Housing – approx.93 apartments	\$	[Federal Govt. stipulation] ⁷²
19.	Wharf 6 upgrade <i>Antarctic</i>	\$	[Federal Govt. stipulation] ⁷³
20.	Wharf 5 upgrade <i>Defence</i>	\$	[Federal Govt. stipulation]
21.	Wharf 4 upgrade <i>Commercial</i>	\$	[Federal Govt. stipulation]
22.	Commuter ferry terminal upgrades	\$	
23.	Precinct plan	\$123,400,000	
	Bus plaza		
	Davey St. footpath		
	UTAS pocket park		
	Collins St. redesign		
	Evans St. redesign		
	Hunter St. carpark		⁷⁴
	Indigenous plaza		
	Pedestrian bridge – Collins St		
	Northern access Road		
	Programmed water fountains		⁷⁵
	A continuous waterfront walk		⁷⁶
24.	Art sculptures	\$ 500,000	⁷⁷
25.	TSO sound-proofing	\$ 4,450,000	⁷⁸
26.	Hawthorn match subsidy	\$ 4,000,000	[4 x \$1,000,000 per match, est.] ⁷⁹
27.	North Melbourne match subsidy	\$ 4,000,000	[4x \$1,000,000 per match, est.] ⁸⁰

65 KPMG Cost Benefit Analysis p.1 KPMG Economic Impact Assessment p. 8 states \$1.6 million. Nicolas Gruen estimates \$8 million (after receiving one estimate of \$15 million). *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 93

66 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 91

67 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 Addendum Xmirus p. 6 May also included Naval oil pipeline.

68 <abc.net.au/news/2024-09-23/macquarie-point-hobart-afl-stadium-costing-exclusions/104384054> Accessed 10 June 2025

Car Parking and Access Review Traffic Engineering Report SALT³ Proponent Submission p. 12

It is unclear how any car parking spaces can be reserved for AFL staff, if the carpark is sold to a “private operator,” as the ABC reported MPDC CEO Anne Beach saying.

<abc.net.au/news/2025-01-07/detailed-costs-revealed-hobart-proposed-macquarie-point-stadium/104787552>

69 Food and Beverage, Stadium Tasmania Offices, Corporate boxes

70 *Club Funding and Development Agreement Schedule 10* p. 60/67 1(b)(iv)

Independent Review of the Macquarie Point Stadium Nicholas Gruen 1 January 2025 p. 91

71 <abc.net.au/news/2025-05-27/macquarie-point-stadium-enabling-legislation-released/105339114>

72 Letter from the Hon. Catherine King MP Minister for Infrastructure to Premier Rockcliff 28 April 2023.

73 Letter from the Hon. Catherine King MP Minister for Infrastructure to Premier Rockcliff 28 April 2023.

74 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 91

75 *Urban Design Framework* p. 9 Also ‘misting sculptures’. In Hobart? p.14

76 *Urban Design Framework* p. 10

77 *Macquarie Point Redevelopment Public Art Strategy Discussion Paper* p. 5

78 <abc.net.au/news/2025-05-27/macquarie-point-stadium-enabling-legislation-released/105339114> Accessed 10 June 2025

79 *AFL Licence Taskforce Business Plan 2019* p. 10 at Point 9 8.2(sic) [presumably meaning 9.2]. and p. 15

28.	Spirit of Tas. Sponsor	\$ 2,500,000	[North Melb., per year, estimate] ⁸¹
29.	Reputation damage domestic	\$	[Historic waterfront]
30.	Reputation damage international	\$	[Historic waterfront]
31.	Noise pollution	\$	[Hospital, local residents, tourists]
32.	Visual pollution	\$ 1,000,000	[stadium size, constant] ⁸²
33.	AFL penalties – stadium delay	\$ 4,500,000	[per year, after Round 1,2028] ⁸³
34.	AFL penalties – licence delay	\$ 4,500,000	[per year, after 31 Oct. 2027] ⁸⁴
35.	AFL penalties – cancellation	\$	[stadium abandoned] ⁸⁵
36.	Credit rating downgrade	(\$30,800,000)	Add 0.20 per cent to loan costs ⁸⁶
37.	Marginal Excess Burden	\$86,700,000	20 per cent. ⁸⁷ Cost of public funds
38.	Lifecycle costs	\$73,100,000	maintenance, demolition etc. ⁸⁸
39.	MPDC Project Resourcing	\$ 7,500,000	⁸⁹
40.	Business compensation	\$	[Lost custom during construction]
41.	Apprentice training subsidy	\$	Understood to be in effect
42.	Local turf farm	\$	[AFL stipulation] ⁹⁰
43.	Carbon emissions	\$	[net zero target]

The preliminary total, using these estimates from qualified economists, is **\$1,469,598,000.**

This figure does not include substantial items such as site remediation, housing, wharf upgrades, stadium carpark or reputation damage. It also does not include potential credit rating downgrades or the potential for world affairs to render loans more expensive.

The grand total will surely exceed **\$2,000,000,000.**

Even this assumes that the actual construction cost will not exceed its budget. This appears very unlikely as the ‘Risk Engineering Society’ and ‘Engineers Australia’ found, in 2019, that -

* Large Infrastructure cost estimates were “highly and systematically misleading.”

* Cost overruns of over 20% occurred in 50% of [3,000] government projects studied.

* The mean cost overrun was 34.20%.

80 A recent *The Age* article about North Melbourne’s finances did not appear to mention the club’s relationship with Hobart or the many millions of Tasmanian taxpayer dollars that has supported it. <theage.com.au/sport/afl/why-an-investment-banker-with-roos-blood-in-his-veins-stormed-into-john-elliott-s-office-with-a-cheque-20250605-p5m5bg.html> 12 June 2025.

81 *AFL Licence Taskforce Business Plan 2019* p. 35

82 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 95

83 *Club Funding and Development Agreement* p. 11 [10.3a]

84 *Club Funding and Development Agreement* p. 10 [9.1]

85 *Club Funding and Development Agreement Schedule 3* Licence Agreement. This is a template so the redaction at the bottom of page 2 suggests that the AFL does, as a rule, incorporate financial penalties into its contracts if “Licence Conditions Sunset Date” are not fulfilled. It appears pages beyond page 2 have not been redacted but simply not included in this Department of State Growth file. The apparent urgency for the stadium mega project to gain planning approval indicates the contract “bteak fee” may be anything between \$20-200 million. It appears to be redacted.

86 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 94

87 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 93 and p. 97

88 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 92 and p. 97

89 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 Addendum Xmirus p. 6

90 *Club Funding and Development Agreement Schedule 10* 1(c)(v) p. 60/67

* The AFL Docklands stadium cost exceeded its budget by \$65 million in 2000 or about 15 per cent.⁹¹

* Infrastructure NSW has undertaken reviews which demonstrate that megaprojects are approximately 1.5 times more likely to be at risk when compared with projects with an Estimated Total Cost less than \$1 billion.⁹²

It is reasonable to assume that the Federal Government contribution of \$240 million will be required to soak up most of these ‘cost overruns,’ especially as Melbourne and Brisbane compete for stadium construction resources.

Despite this gargantuan cost, the Tasmania Government will not have any “rights in the club.”⁹³ The AFL will appoint the Chair of the club, too.⁹⁴

Sandy Bay UTAS Campus

There is apparently a desire for any new Tasmanian AFL club to appropriate some or all of the University of Tasmania Sandy Bay campus.

This institution, and this campus in particular, is arguably one of the jewels in the Tasmanian crown that has and will support and shape the future of many generations of young Tasmanians.

It was astonishingly remarkable that the UTAS Vice Chancellor would consider such a myopic idea, rather than renovating the current campus,⁹⁵ and yet the 2019 AFL Licence Taskforce reported -

Taskforce members met with Tasmanian Senator Richard Colbeck (LIB) the Federal Minister for Youth and Sport, in relation to future funding of facilities in relation to potential AFL facilities in Hobart and / or Launceston.

Senator Colbeck indicated that University of Tasmania (UTAS) plans to relocate the Sandy Bay campus into the Hobart CBD may open a door to discussions for use of the vacated premises.

Any use of existing premises would align with UTAS funding requests in that it would match Government preference for use by multiple organisations (i.e. UTAS and TFCL).

Taskforce members then met with UTAS Vice Chancellor Rufus Black, who indicated a high degree of enthusiasm about a conceptual partnership between Government, UTAS and an AFL entity.

The Taskforce would encourage further development of this concept, which remains dependent on UTAS progress towards a campus relocation.⁹⁶

91 Docklands Stadium (Marvel), Sports Industry AU, accessed 25 November 2024
<footyindustry.com/stadiums/docklands/>

92 *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 Addendum Xmirus p. 15

93 *Club Funding and Development Agreement* Part C 7.3 p. 8/67

94 *Club Funding and Development Agreement* 2.3(b) p.3/67 The AFL has never had a Tasmanian Commissioner. *AFL Licence Taskforce Business Plan 2019* p. 12

95 By following the refurbishment lead of the University of Melbourne during the past 20 years, for example.

96 *AFL Licence Taskforce Business Plan 2019* p. 50-51.

I am concerned that the AFL has a desire for a Tasmanian club to occupy the Sandy Bay university campus, in order to avoid investing even \$10 million in the club headquarters (that will eventually be refunded to it).⁹⁷

Indeed, it is not entirely clear that the Kingston development is intended for male AFL players. It may be intended for female players⁹⁸ which would fuel an urgency to relocate the uni campus.

I am also concerned your government may support such an endeavour to the detriment of future Tasmanian scholars. At least one news report suggests you do not oppose it.⁹⁹

I am also concerned that the university campus may be transferred to RSL Tasmania to relocate the Cenotaph and/or sold to the National Rugby League (NRL).¹⁰⁰

In this way and to this extent, the financial- and reputation costs to Tasmania of this mega-project may be considerably greater if part of the larger AFL strategy is to promote the dislocation **and separation** of an entire university campus into various banal, concrete pockets of the city.

Proponent Representation 3¹⁰¹

The proponent has not numbered their comments, ignoring professional convention, and has used symbols ('dot points'). These have been converted to numbers, in the interests of clarity and legality.

1.1 Macquarie Point Development Corporation suggest that they are the proponent. This is incorrect. It is understood that The Crown in Right of Tasmania is the proponent.

6.3 "With a Tasmanian team, there is an expectation of increased visitation arising from expatriate Tasmanians visiting to support the Devils."

This expectation must be very weak as any 'expatriate' Tasmanians living on the mainland will surely be able to attend a Tasmanian club AFL and AFLW match in their nearest capital city. This may even include Darwin, Alice Springs and Cairns.

For reasons of time and cost, it is more logical to assume that the overwhelming majority of 'expatriate' Tasmania fans will prefer to catch a train or bus to a Devils match, and not a plane.

6.4 An unbalanced AFL fixture each year will not alter this motivation as it has been a principle of the AFL competition each year that every team plays every other team at least once per season.¹⁰²

It is more probable that anyone on the mainland who wanted to see a specific opponent face the Devils would choose to see that match in Melbourne (or any other capital city with more to offer).

97 *AFL Licence Taskforce Business Plan 2019* Schedule 9 20.2(d) p. 22/67

98 It remains unfortunate that female players are apparently content to play in a league named AFLW (when the men are not called AFLM or MAFL). The Tour de France Femmes is another example. Still, this is a League that thought it a good idea to name a new club as a Health bureaucrat would.

99 <saveutasampus.com/_files/ugd/54d3ee_1515c6bb4c0b454d8bc0dd9b2a86fa7b.pdf>

100 Such a *fantastic* idea is not beyond wild imagination. The WA Premier has reportedly allocated \$65 million of public funds to subsidise a new NRL team, the Perth Bears [NB 'fantastic' means 'out of this world', not 'good']

101 Formally known as *The Matter of the Macquarie Point Multipurpose Stadium Integrated Assessment Under the State-Policies and Projects Act 1993 Representation 3 on behalf of proponent*.

102 This may not always been followed. For example, it is thought Hawthorn versus Carlton matches were scarce at one time or another.

- 6.5 It is likely that any Tasmania team will struggle for success in a national league as the current clubs will be reluctant to concede priority ‘draft picks’ to the team.¹⁰³ This will be more likely to dilute the Tasmanian ‘brand’ and discourage travel to Tasmania.
- 6.7 There is no remark as to why the annual Hobart International Tennis Tournament, since 1994, was not used as a benchmark entertainment event in the economic modeling.
- 7.1 The estimate of 1,510-3,229 FTE jobs during construction appears to be an unacceptably inaccurate estimate considering stadia of a comparable size have been built in Australia in recent decades, such as Townsville.¹⁰⁴ Indeed the AFL commissioned the Docklands stadium so it should still retain the labour wage invoices.
- 7.2 It is unclear how Gross State Product (GSP) of \$250m-\$269m will be generated if the State is paying for the mega-project. Economic activity does not always generate GSP (such as when subsidies are used).¹⁰⁵
- 7.3 “The creation of 203-204 FTE jobs on an ongoing basis as a result of the stadium’s operations.”

This appears to be a high number. It must include all employees of Stadiums Tasmania and the club (AFL and AFLW). It is unclear what this “basis” is but it may include scores of casual workers employed one night per fortnight, for example (cleaners, security, attendants etc).

- 8.1 It is remarkable that the proponent asserts that “The fact that funds could be invested or used elsewhere **may** be relevant to a CBA [author’s emphasis] [cost benefit analysis] but does not form a proper basis for assessment of financial impact.

Independent economist Nicholas Gruen quoted *Infrastructure Australia*

“In the case of land, the capital costs should include the opportunity cost of the land used, even where this is currently owned by government.”¹⁰⁶

Strangely, it appears that the MPDC, for the proponent, is inferring that a cost-benefit analysis (of which ‘opportunity cost’ may be one element) does not inform a financial impact assessment.¹⁰⁷

If this is the belief of the proponent, is it unclear why they have spent hundreds of thousands of dollars (and possibly millions) on KPMG to write at least three economics reports.¹⁰⁸

It appears the phrase “alternative economic investment” may have been misunderstood. This does not necessarily mean that funds are “used elsewhere” but that the same funds are invested at the same site [Macquarie Point] on a different project.

103 <afl.com.au/news/1318982/more-details-revealed-as-tasmania-devils-list-rules-take-shape-ahead-of-debut-in-2028-season> Accessed 11 June 2025

104 FTE Full Time Equivalent.

105 A mega project is one that costs more than \$1 billion.

106 Infrastructure Australia (2021) Guide to Economic Appraisal, p. 29 quoted in *Independent Review of the Macquarie Point Stadium* Nicholas Gruen 1 January 2025 p. 87

107 MPDC Macquarie Point Development Corporation

108 Total consultants fees have been estimated at \$65.5 million.

Their apparent misunderstanding of ‘opportunity cost’ may explain why they then assert that “It is not a relevant matter for determining whether land use and development approval should be granted.”

- 9.1 It appears rather hollow to infer that the Planning “Commission’s extension of the scope of the Project to include non-Project items” is unwarranted when the AFL has been intransigent in waiving contract conditions that stipulate, in essence, ‘No stadium, no team’ (with considerable financial penalties attached).

This intransigence means that all of the project costs, listed above, are relevant.

Further, the contract between the State Government and the AFL includes “remediation, demolition, piling, foundation, any minor road relocation, plaza civil works and infrastructure service costs” are included in the “construction costs for the stadium.”¹⁰⁹

Summary 11.

“the *Club Funding and Development Agreement* sets out the AFL's direct investment in local Tasmanian football programs.”

It is unclear where this reference is in the document (it was not footnoted) or for what amount.

KPMG suggest \$33 million is to “develop young players in new talent academies” which may equate to \$3.3 million per year for 10 years.

An additional \$90 million is allocated for “game development,” which is not defined. It may be assigned to AFL and AFLW player remuneration.¹¹⁰

The AFL, through AFL Tasmania, is planning a ‘Kicking goals’ schools program to install ‘Aussie Rules’ goal posts in all state government schools by 2028.

This is actually an infrastructure investment (arguably the sole purview of the State Government) and it is somewhat contentious to assign “enormous social and community benefits to it.”

- B2. “There is potential for positive impact on the sense of community due to the establishment of Tasmanian AFL.” The potential is less than what it could have been, due to three main factors -

1. The AFL is very late arriving in Tasmania by about 40 years and it arguably does so insincerely with its hand firmly in the taxpayer cookie jar.

Soccer now has about 38,000 participants and there is a shortage of some 16 basketball courts in Hobart alone.¹¹¹

The AFL Taskforce noted “an estimated 3000 adult males of playing age have left the north-west competitions in the five years to 2018.”¹¹² It also found:

¹⁰⁹ *Club Funding and Development Agreement* 21.1 p. 22/67

¹¹⁰ KPMG Social and Cultural Analysis Report p. 20

¹¹¹ <australia.basketball/news/4218134/state-facilities-strategy-identifies-critical-court-shortage>

¹¹² *AFL Licence Taskforce Business Plan* 2019 p. 22

The popularity of Australian Rules football has declined in Tasmania over the past decade [to 2019], with Fanatics decreasing by 19% (37% to 30%) and the number of disinterested consumers increasing by 36% (42% to 57%). The Fanatics segment is critical, as this demographic accounts for 80% of revenues...¹¹³

These metrics will surely worsen as Tasmanian television broadcasts of all Saturday AFL football have been cancelled for at least the next six years.

2. Tasmanian AFL supporters have spent 125 years *identifying* with a mainland AFL team, often Collingwood, Carlton or Essendon (and more recently, Hawthorn).
3. The stratospheric cost of the Macquarie Point development (and its main tenant, the team) will inevitably cause taxes to rise and services and standards to decline and public assets to be sold (resulting in even higher charges and prices).

Semantic distinctions between ‘Macquarie Point,’ ‘stadium’ and the ‘team’ will mean little to the average citizen who will find the cost of living even more difficult and wait times for services even worse than today. The stadium and/or club may become symbolic of this, limiting civic pride.

- B4. The ground occupancy agreement apparently has not been finalised. It is premature to suggest that the Devils will be an ‘anchor tenant’ or, if they are, whether or not that is on fair commercial terms. The fact that the AFL has already extracted a one-way ‘crowd revenue guarantee’ from the state government suggests negotiations *should* be prolonged.¹¹⁴
- B9. “An opportunity exists for Aboriginal communities to express their values and culture throughout all of the public space available.”

Only, arguably, to the extent that they may do so at an industrial site, limited by budget and constrained by space, themes, and crowd logistics (and probably materials). Aboriginal communities will surely not have the freedom to canvas *truth*, such as colonisation, massacres, deaths in custody or any of the Closing-the-gap targets.

Football supporters arguably attend matches to *escape* the truth.

The AFL’s ‘Indigenous round,’ that now seems to stretch across two weeks, provides a television spectacle but the dismal treatment of Adam Goodes 2013-2015 arguably still reverberates, wide and far (notwithstanding the AFL apology of 2019).¹¹⁵

Despite the experience of Nicky Winmar decades earlier in 1993, it was clear the AFL was still without sufficient knowledge, diplomacy, empathy, skill and management expertise to protect one of its main cohort of (male) players. It remains a critical management failure.

There is an allusion that any plaza set aside for indigenous themes has been done so in an effort to limit the risk of Aboriginal groups campaigning to return Macquarie Point to a previous idea of using the site for a reconciliation park.

113 AFL Licence Taskforce Business Plan 2019 p. 24

114 Club Funding and Development Agreement 5.9(b) p.8/67 Yet if crowds exceed expectations, the Tasmania Government does not get to keep the difference. 5.9(c) p. 8/67

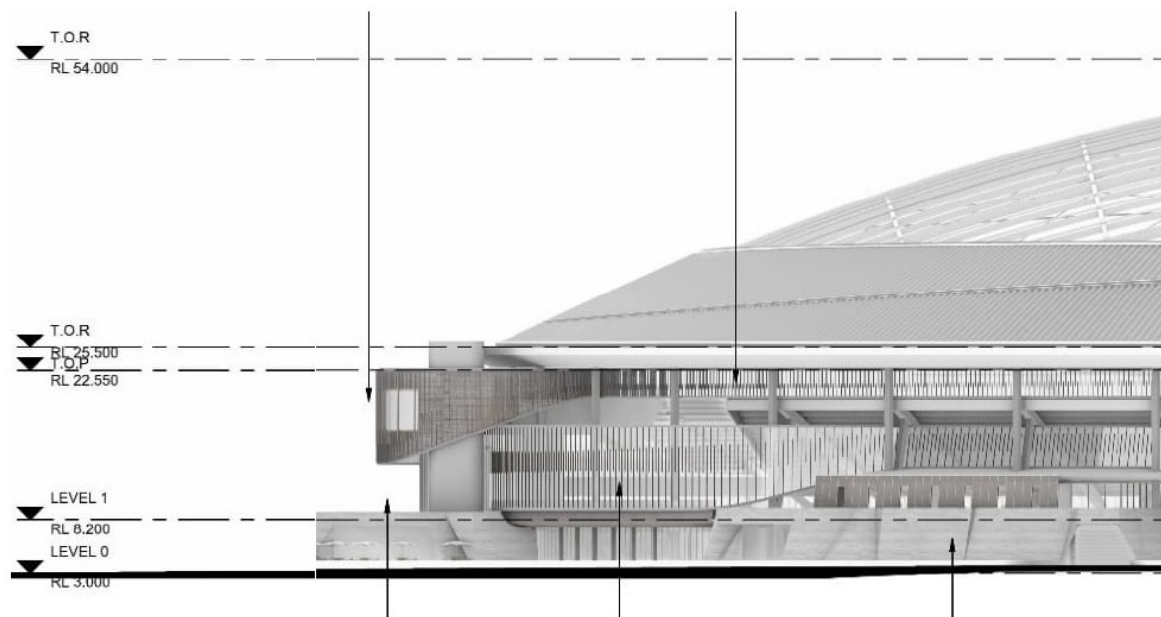
115 <nma.gov.au/defining-moments/resources/afl-apology-adam-goodes>

C18 It is spurious reasoning to state that “it is not a large stadium in comparative terms.”

Local Hobart residents, will not count their blessings that the stadium could have been as high as one in Sao Paulo. They will notice it permanently eclipses the streetscape and historic waterfront.

It appears there is a semantic difference between ‘stadium’ and ‘building’ and ‘height’ and ‘elevation’.

The stadium height is reported to be 54.0m, however, it appears the building elevation will be 57m above street level.¹¹⁶



Visual Impact Assessment Report p. 24, SLR Consulting [quoting Cox Architecture].

The visual renderings or photo-montage appear to be misleading because no evidence was provided in the *Visual Impact Assessment Report* that maths, and specifically trigonometry, was used.¹¹⁷

The discussion of the method used to create the images includes technology and software but does not, unfortunately, extend to a theodolite.

This arguably does not reflect positively on a project of this scale and importance.

It is unfortunate that despite this, various visual renderings of the stadium have been repeatedly published by the mainstream Australian media, including the *Mercury* and ABC Television.

¹¹⁶ *Visual Impact Assessment Report* p. 20 and 22.

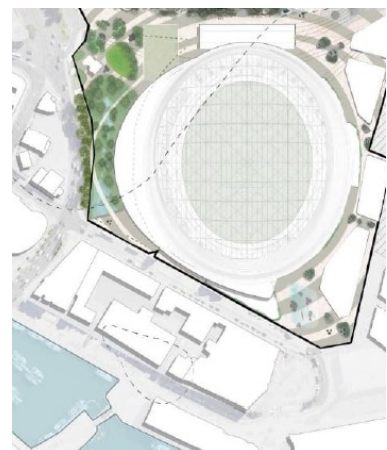
¹¹⁷ *Visual Impact Assessment Report* p. 35



H. Jones IXL Jams (above) is estimated height is 12m. The apex of the roof does not appear to be 57m.



IXL Jams is estimated to be 13m high. The stadium directly across the street does not appear to be 57m, or more than four times in height. The perimeter does not appear to be 28.5m in height.¹¹⁸



The Royal Engineers Building gable is estimated to be 10m in height. The building perimeter to the immediate east does not appear to be 28.5m. Indeed, it appears no provision has been made for the 3m carpark base foundation. The apex of the roof, partly obscured, does not appear to be 57m in height, or almost six times higher than the Royal Engineers Building.

SLR Consulting suggest there is a “visual contrast with existing site and surrounding features but the character of the view does not fundamentally change. They assess the ‘Impact Magnitude Rating’ (sic) as ‘Moderate Change.’

This is highly contentious. The proposed stadium will arguably overshadow the Royal Engineers Building to such an extent that new visitors may mistake this historic building as a Stadium security operations cottage.

It appears no provision has been made for the ‘naming rights’ signage, despite the high likelihood of it being present (because it will increase revenue).



<google.com/maps>

This section is divided, as follows -

1. Timing
2. Deadline
3. Economic forecast– demographics
4. Economic forecast – caution
5. Economic forecast – interstate visitors
6. Economic forecast – event subsidies
7. Economic forecast – team subsidies
8. Economic forecast – cricket revenue
9. Cruise ship revenue
10. Intellectual property

11. Calculations
12. Opportunity cost
13. Terminal value
14. Construction
15. Housing
16. AFL contribution
17. Positive Impacts Risk Register
18. Health and Productivity
19. Natural Values Assessment
20. Tourism
21. Location
22. Remediation
23. Separate project
24. Noise
25. Design
26. Identity
27. Insufficient regard
28. Heritage
29. AFL probity
Privilege, Sexist, Unreliable, Unaccountable, Deceptive, Miserly, Profligate, Elitist, Controlling
30. Conclusion

1. Timing

It is unclear why the Stadium proposal was actually submitted for consideration as it is apparent that issues remain unaddressed.

An environmental auditor has also advised that “full site remediation, assessment and auditing has not been completed, and in particular has not been completed for the changed development scenario.”

Further, it appears the *Natural Values Assessment* should effectively be considered a draft as it was submitted before the final design is confirmed (informing, among other factors, how much ‘cut and fill’ may be required).¹¹⁹

It is also evident that there is currently no appropriate mitigation strategy for “unnecessary or unacceptable impact on natural assets” within a waterway or coastal protection area.¹²⁰

It appears clear the proposal is deficient in funding of every cent of at least \$400 million and no clear detail has yet been provided as to where or how those funds will be gathered or secured.

2. Deadline

The Planning Commission noted there is a “far tighter time frame than would otherwise be applied to major infrastructure” and that “construction timelines are similarly highly constrained.” The basis for this urgency is not explained but it is arguable that urgency will increase the likelihood of mistakes at any stage of the process. This may include workplace accidents.

¹¹⁹ North Barker p. 30

¹²⁰ North Barker p. 29

The unredacted contracts, deeds and agreements signed between the Tasmanian State Government and the AFL should be released immediately, to better understand the nature of this urgency.

It appears the Australian construction industry simply may want a continuously extruded ‘sausage’ of lucrative employment (possibly timed to conveniently begin after the completion of the Bridgewater Bridge and Melbourne ‘Metro tunnel’).

That is their right but one sector of society (or even the economy) should not be afforded undue influence at the expense of what the Tasmanian community genuinely wants and really needs.

The committee noted its accord with the *Gruen Independent Review of Macquarie Point Stadium* at various points. Dr. Gruen’s notes seven AFL matches and 3 AFLW matches will be played at the proposed stadium.¹²¹

This does not even amount to 25 per cent of forecast activity at the stadium so it would appear the AFL has too much influence in regard to the design, timing and construction of the stadium.

The risk of AFL financial penalties on the project should be considered as they may be outrageous and debilitating, depending on the amount. It is a serious concern that they remain secret.

The actual influence of the AFL does not correlate to pronouncements that the stadium will be ‘multi-purpose’ or with the list of ‘stakeholders’ that includes Melbourne Storm, Cricket Australia, Rugby Australia, Football Australia, and Live Nation.

The State Government, using similar resources of the proponent, has a poor recent record of arranging the development of new car ferry terminals at Devonport as geo-technical surveying, one of the most preliminary stages of project planning, was being conducted *after* at least one of the two new ‘Spirit’ vessels were due to be delivered.

In this light, it was arguably an irresponsible risk for the Premier to sign any contract with the AFL that included financial penalties for delayed completion.

Economic Forecasts

3. Demographics

It appears the proponent has not adequately considered the social profile of Hobart, especially in regard to potential crowd attendance.

1. 28 per cent of locals were born overseas.
2. 35 per cent are renting (and 27 per cent are experiencing ‘rental stress’).
3. 49 per cent have a tertiary qualification
4. The median age is about 38
5. The greater population is 224,000, meaning the stadium is proposed to have capacity for 10 per cent of the population (while the MCG and Docklands stadia cater for 2.8 per cent of Melbourne’s total population).¹²²

121 Nicholas Gruen *Independent review of the Macquarie Point stadium* 1 January 2025 p. 100

122 MCG 100,000 plus Docklands 50,000 for the population of 5,350,000.

6. There is an immediate shortage of at least 16 community basketball courts in the greater Hobart area alone, suggesting basketball is more popular than the AFL with the younger generations.¹²³
7. World football (soccer) is “Tasmania’s most played team sport with 38,000 participants,” yet for every one dollar invested in soccer, seven are invested in basketball, and 28 are invested in Australian Rules.¹²⁴

4. Caution

The proponent’s economic and financial reports do not appear to contain the names and qualifications of the author(s). These reports should be treated with caution as there seems to be an absence of accountability.

The veil of anonymity means it is not possible to verify the qualifications and/or experience of these individuals employed by these companies or whether they may have a vested interest or conflict of interest.

5. Interstate Visitors

It appears the economic benefits of prospective interstate AFL supporters have been considerably overstated, both in the number and the duration of the average visit.

The AFL will apparently schedule up to seven AFL games and three AFLW games per year in Hobart.

The AFL is **not** likely to schedule any home games for Devils (men) against teams that attract -

Crowds three time as large at the MCG (69,000+) Collingwood, Carlton, Essendon
Crowds twice as large at the Docklands (46,000+) Richmond, Geelong, Melbourne

This is likely because larger crowds means increased revenue for the AFL, compared to Hobart ticket sales. This could only be mitigated if the Tasmanian government (or other entity) financially subsidised the difference in ticket revenue for any of these matches.

The revenue difference between 69,000 adults at the MCG compared to 23,000 adults in Hobart is about \$1,161,000 per match (@\$27 per average ticket,¹²⁵ a somewhat optimistic price for a sell-out in Hobart considering about 18 per cent of residents have a weekly income of less than \$650 per week and about 35 per cent rent their accommodation with a median *weekly* rent of \$630)¹²⁶ (and further, about 28 per cent of Hobartians were born abroad (19 per cent speak a foreign language at home),¹²⁷ meaning they may have little interest in regularly attending Australian sports matches).

It is understood that the AFL also owns Docklands Stadium and so does not need to pay for game-day venue hire. This financial impost could only be mitigated if the Tasmanian government continued to subsidise the Devil’s visiting opponents, as well.

123 <australia.basketball/news/4218134/state-facilities-strategy-identifies-critical-court-shortage>

124 <pulsetasmania.com.au/news/ambitious-plans-revealed-for-new-80-million-soccer-centre-in-southern-tasmania/>

125 AFL 2024 annual report p. 29

126 *City of Hobart Capital City Strategic Plan 2023* p. 5. These figures differ from the proponent’s submission ‘MPS Housing for Workforce’ submission p. 2-3

127 *City of Hobart Capital City Strategic Plan 2023* p.6-7

It is reasonable to assume the AFL will schedule the Devils to play these 6 teams once per season in Melbourne. The teams with the most supporters proximate to Tasmania will likely be the ones to play in Hobart the least.

It is likely that frequent visiting teams to Hobart will include Gold Coast Suns, Brisbane, Adelaide, Port Adelaide, Fremantle, West Coast (Perth), Greater Western Sydney, Sydney, Footscray, North Melbourne, Hawthorn, St. Kilda.

Matches are likely to be scheduled in Hobart for Saturday, as even (employed) Melburnians (let alone the remainder of the mainland) would not be confident of reaching the stadium by Friday 7:30pm (not forgetting a momentary visit at their accommodation to deposit luggage and assuming their air journey was without delays).

This may be mitigated by a Friday 8pm game start but would arguably discourage sports participation by children if they were watching the conclusion of a Hobart match at 11pm, the night before their own sports commitment.

On this point, it is worth noting that the consumption of televised sport is a vicarious adventure; it actually discourages active sports participation because the viewer subconsciously believes they are a participant on field. Child viewers are arguably even more vulnerable to fantasy.

The heart rate of television viewers should increase when the match begins and then again at challenging moments. Viewers often consume calories during the match, expecting to actually need them. Hormones, including Adrenalin, may be released because the mind actually believes its visual and auditory senses.

It is possible repeatedly viewing televised sport at night induces obesity, lethargy and insomnia (and so, in turn, anxiety) and particularly among children who are known to make immature decisions regarding their health, diet, and lifestyle.

Adolescents, for example, may exhaust themselves, watching night sport, in order to see the final result thereby impairing their health and mood.¹²⁸

KPMG argues the opposite but subjective responses of TV-viewing sports fans (in Japan) arguably mistaken Adrenalin for happiness and happiness for contentment.¹²⁹

This factor may have been tacitly accepted by the AFL and its associates as Saturday night broadcasts of all AFL games on terrestrial television in Tasmania have been stopped until about 2031, at the earliest.

See also *Sport, Culture and the Media* by David Rowe (Open University Press, 1999).

The average duration of interstate visitor stay is likely to be one night because most people who can afford to fly interstate to attend a football match (or any other sports event) probably have to be at work on Monday morning.

¹²⁸ For reasons unknown, some parents not only take children under 14 to football matches but even toddlers.

¹²⁹ KPMG *Social and Cultural Analysis* p. 23

For Saturday afternoon matches, it is reasonable to assume that the airlines will schedule return flights on Saturday nights (for those visitors who want to attend matches as a day-trip and for opposition teams who will want to return home after the match).

This suggests the average night stay is likely to be less than 2.5 night predicted, with spending outside the stadium commensurately lower than predicted. Some affluent Tasmanians fly to Melbourne for the day to attend AFL afternoon matches and do not stay even one night.

Beyond the novelty first season, it is **not** credible to suggest that at least 1,700 people will travel from interstate to watch any given Devils match (men or women) (*Gruen Independent Report* p.108).

Relatively new teams with few supporters (GWS, Gold Coast), particularly distant teams (West Coast, Fremantle, Brisbane, Gold Coast) and those teams which have had recent financial challenges (St. Kilda, North Melbourne, Footscray) are arguably even less likely to attract even 500 interstate visitors to Tasmania per match.

In recent years, the AFL regularly offered hundreds of stadium tickets *gratis* each week to school teens in one Victorian region alone (Gippsland) so even in its heartland, the AFL is either not quite as popular as the total crowd attendance may otherwise suggest or its Victorian ticket pricing is seen as expensive. It is thought the cheer squads of each team also receive scores of free tickets every week to sit behind the goals (probably a welcome decision for television broadcasters who value ‘visuals’).

The value of interstate visitors to Tasmania may be clarified if the percentage of international Tasmanian Devil members is publicly revealed. The membership price (\$10) did not require an onerous financial commitment but the description of about 100,000 members being “outside Tasmania” suggests a certain percentage live abroad.

The cost-benefit analysis does not appear to incorporate current Tasmanian government subsidies of about \$1 million per match to Hawthorn and North Melbourne. When these two teams play the Devils twice per year, will the Tasmanian taxpayer be subsidising both teams as well as the stadium or will the agreements with both football clubs definitely not be extended thereby erasing the costs (and benefits) of these agreements?

If the AFL and the proponents are so confident of the game’s popularity in Tasmania and its financial forecasts for this proposal, then why do these two Victorian teams require any financial subsidy at all? The answer appears to be that neither team would abandon the revenue of a Melbourne home match unless it were in their financial interests to do so.

It appears each match at Launceston or Bellerive is currently subsidised by the Tasmanian taxpayer to the tune of about 37,000 adult seats for each match (@\$27 per average MCG ticket).

It is open to conclude that the AFL has no interest whatsoever in Tasmania, unless the Tasmanian taxpayer effectively pays it to transfer matches from the Melbourne that would otherwise not attract 50,000 adult spectators (or equivalent) (13,000 attending in Tasmania plus the 37,000 MCG adult seat subsidy).

This point should be considered by the Panel as it informs as to whether the AFL is indeed a suitable partner for the proponent; the Tasmanian State government appears to be assuming too much risk and the AFL too little risk.

6. Event Subsidies

There is a forecast stadium operating state government subsidy of about \$7.7 million per year, for 30 years.

There is a forecast stadium Event promotion state government subsidy of about \$1.6 million per year, for 30 years.

It is unclear if either of these amounts include the 20 per cent funding of venue services on Event day (casual employees), apparently recommended as industry-standard subsidy to attract interstate 'events' and performers.

7. Team Subsidy

It is unclear why the panel notes the government subsidy of the AFL and AFLW Devil teams would be \$98.6 million when it has been reported that the Tasmanian government would subsidise the team with \$12 million per year for at least the first 12 years (\$144 million).¹³⁰ NPV is arguably of little interest to people who die on the ramp of the Launceston hospital, as if they were living in a developing country.¹³¹

This amount seems to be an exorbitant subsidy considering Hobart has a smaller population than Geelong and that Tasmania has a smaller population than the Gold Coast.¹³² It is likely the AFL would invite the Devils to leave the AFL league, whenever this \$12 million annual subsidy was stopped. It is arguably a cost 'in perpetuity' and should be recorded as such.

Again, given the AFL ultimatum of 'No stadium, no team,' the Tasmanian government contribution to the construction of the Devils teams gym of \$60 million should be included in the costings as the Order refers to "the... development or construction of d) any other facility...necessary... for the implementation of the project."

It is probable that the construction of a premium gym headquarters is part of the (secret) agreement between the State Government (proponent) and the AFL.

8. Cricket Revenue

Test matches are currently scheduled for five days in duration (not four). If the forecast is for one test match to be played every four years, should not this be recorded, for the purposes of revenue forecast, as 1.25 days per year, not 5 (or the stated 4)?¹³³

This is an optimistic forecast as Hobart will always face intense competition from Adelaide, Perth and Brisbane for a fifth test (with each respective venue generating more revenue for Cricket Australia than Hobart could, without government subsidy).

An alternative model of a 'test newcomer' playing in Hobart, such as Bangladesh or Afghanistan, would arguably not be a 'Tier 2' event and would likely **not** attract 14,000 spectators per day for five

130 <abc.net.au/news/2022-09-20/tasmanian-government-funding-increase-for-afl-licence-bid/101456530>

131 KPMG *Cost Benefit Analysis* p. 14

132 It is understood the Federal Government paid for most of the invoice for the Geelong stadium, not Geelong City Council.

133 Nicholas Gruen *Independent review of the Macquarie Point stadium* 1 January 2025 p. 100

days. This would almost certainly be the case if it is an 'Australia A' side playing. The brevity of 'Tik Tok' clips is anathema to the idea of watching Test cricket, especially in person.

The proposed stadium may generate revenue from Sheffield Shield matches, assuming there is no closed roof. It is understood Tasmania has a female- as well as male- Sheffield Shield teams. It is understood these First Class matches are four days in duration (or will they stay at Bellerive?).

9. Cruise ship revenue

If any domestic cruise ship operators add Hobart as a destination because the stadium is completed (so that domestic Australian passengers will have the option of attending an event), then it is arguable that this will be offset by international cruise ship operators removing Hobart as a destination due to the loss of waterfront ambience and character.

International cruise ship passengers arguably want to visit new destinations (that do not resemble home, such as Britain and the USA, with all their concrete stadia).

Tourists to Tasmania arguably want a *participatory* experience they cannot get at home such as a Salamanca Market, 'Wooden Boat festival', 'Dark Mofo,' 'Solstice Swim' or the 'Taste of Tasmania'. It appears the Hobart stadium will not offer anything unique as spectating is a sedentary activity. Strict security on entry will likely dissuade some people from attending and exacerbate street congestion.

Natives of New South Wales and Queensland view Australian Rules as alien, as 'aerial ping pong,' (its kindest epithet) with inscrutable rules and international tourists will likely have the same attitude.

Further, international passengers arguably do not want to share the streets with football supporters, whether ebullient or cranky. They also likely do not want to share the peaceful evenings with the noise of a MotorX dirt rally or Monster Truck derby (or the trucks needed to transport mounds of dirt in and out of the stadium).

10. Intellectual Property

The current design of the proposed 'Tasmanian Devils' football club logo is arguably vulnerable to depreciation. It is a regret that the logo appears more angry than hungry, and the jumper design old-fashioned. It is embarrassing that some people are apparently trying to revive the VFL State of Origin. The 2025 Tasmanian jumper design dates from this era and is actually 40 years out of date.

The mascot (and even the club) will arguably appear hollow and ironic, if every real devil dies of facial tumours in the meantime, due to an absence of proper State- and Federal- government action to save the species.

11. Calculations

It is unlikely that the average 'one-off event' will compromise a crowd of whom 20 per cent travel from interstate. It appears KPMG misunderstood Cricket Australia's use of 'non local' to mean 'interstate'.

It is unlikely that 20 per cent of the crowd at a cricket match in Australia have travelled from interstate when all states and territories, in an average season, host many cricket matches.¹³⁴ A

¹³⁴ KPMG Cost Benefit Analysis p. 19

cricket spectator may, however, drive a few hundred kilometres to see a capital city game in their own state, making them ‘non local’.

If indeed the average test match will result in the employment of up to 1,010-1,210 stadium staff,¹³⁵ This metric should be delineated as full-time equivalent staff (FTE) so that “up to” is clearer.

This would appear to be a very high number considering the proposed capacity is 23,000 and that a lot of ‘fast food’ may be created by Industrial kitchens near Tullumarine and flown to Hobart with the competing team.

If NPV (Net present value) is to be used as a tool of economic analysis, it should be applied to consistently to all categories, including benefits.

KPMG state that “only interstate statistics have been used for modelling purposes” so it is unclear why International tourists were used as a basis to calculate ‘Producer surplus’ and ‘Labour Surplus’ when this same cohort were not used to calculate the value of in-bound visitation.¹³⁶

It is very unlikely the stadium will attract 104 **new** business events each year (two per week) with an average attendance of 250 people and it is unlikely 20 per cent will be from interstate (p.21).

The forecast benefits for ‘Sports and Cultural Events’ should be separate (p. 19) so as to better delineate the true popularity and impact of Cultural Events.

It is unclear why KPMG did not refer to the Hobart International Tennis tournament when assessing potential visitor benefits. It is understood that is an annual ‘Entertainment event’ held within a stadium in Tasmania.¹³⁷

It appears visitor expenditure has assumed to be an “evenly split bucket” between “retail trade, accommodation, food and beverage services, and transport services.” (p. 18). It is not clear why this was the basis for calculations when it is surely the case that the average visitor spends the most on accommodation (unless there is an acknowledgement that many visitors are not expected to stay even one night?).

The ‘social use value’ should indeed be calculated as part of the ‘Consumer surplus’. It is likely to indicate a profound deficit.

The Consumer Surplus ‘use value’ does not appear to incorporate the tens of millions of dollars to be spent upgrading York Park, Launceston.

It is not credible to suggest that 75 per cent of visitors to all commercial events will be ‘local’ (meaning 25 per cent are interstate/international) unless the word ‘local’ does not mean Tasmanian and instead means Hobartian (p.24).

The Consumer Surplus ‘non use value’ should not be based on ‘community cohesion’ as Opinion polls suggest a majority of Tasmanians are against the stadium proposal.

135 KPMG *Social and Cultural Analysis* p.12.

136 KPMG *Cost Benefit Analysis* p. 18 and p. 20.

137 KPMG *Cost Benefit Analysis* p. 19

As mentioned, most Tasmanians have followed an AFL team for generations, so these two points suggest any marginal “uplift in civic pride” will be tempered by desecration of the waterfront and Cenotaph city views, in particular.

Further, any “uplift in subjective wellbeing for Tasmanian residents who support the Devils” may need to be reassessed as it was reported Hobart had a critical shortage of 16 basketball courts, due to current demand.¹³⁸

Obviously, the ‘non use’ estimate of \$10.85 does not incorporate community division (not cohesion) (p. 26), diluted team loyalties, and that wellbeing may be influenced by other sports.

By aggregating the criteria of ‘non use value,’ KPMG have arguably inadvertently hidden or ignored the actual ‘non use’ value of community division about this proposal.

It appears no allowance has been made in any regard for the likelihood that Olympic events including athletics and field events will be given a natural boost in promotion as the 2032 Brisbane games approaches.

The ‘incremental benefits’ of ‘increased visitation’ for cultural events is vastly overestimated as it is arguable that many visitors to cultural events are attracted to them exactly because they are not constrained in their development by the idea of a stadium and so, are all the more appealing for it (for example, Dark MoFo, Solstice swim, street festivals).

The relatively small size of the proposed oval, as one of the smallest in the league, means that AFL play may often be congested. The spectator experience as well as Devils team tactics will be limited, as a result. It does not appear this has been considered in the economic analysis.

12. Opportunity Cost

According to Dr. Gruen quoting Elders (p.88), the land of Macquarie Point is valued at about \$49 million (it is not known if this factors in the millions of dollars surely required to remediate the site to make it suitable for profitable use).

If the stadium were to be built, a sizeable portion of that value would, in effect, be lost whenever the State Government pays for the stadium to be demolished and removed (as demolition does not appear to have been factored in as a cost).

In other words, the proponent appears confident that their proposed use of the land will be more competitively profitable compared to any other potential use of the site, even factoring in the effective loss of most land value and the remediation cost.

The proposed suite of financial subsidies and concessions in money and in-kind to the AFL appears to challenge this idea and all but confirm that the “most profitable alternative use” for the site is very likely to be more profitable than the proponent’s plan. That might be -

1) A high-quality mixed-use development appealing to tourists by complementing its historic surrounds while offering unique experiences (for example, cold-climate Canada offers ice-skating and speed-skating, ice-hockey, curling, and shuttleboard). A decent ferry port may reduce traffic on the bridge.

138 <australia.basketball/news/4218134/state-facilities-strategy-identifies-critical-court-shortage> cited 8 April 2025

2) Social housing could reduce the number of homeless people in Hobart, all of whom do or will require *sustained additional* support by the public health system. Public health is a national treasure.

3) A dedicated hospital treating mental health would reduce involvement in the Justice-incarceration system.

4) A dedicated university-led Antarctica gateway may attain global recognition, especially if the Arctic indeed melts and disappears completely.

All of these ideas are capable of generating sustained revenue, without as much proposed football subsidy, more than a stadium.

13. Terminal Value

It is very unlikely the life of this proposed stadium would be 50 years, to 2079. This value does not appear to incorporate climate change (sea level rise, intense storms and Insurance risk), changes in social habits or demographics, advances in technology (for example, ‘Virtual Reality’ goggles etc.) or profligate, unsustainable state government spending.

Brisbane is apparently planning to demolish the ‘Gabba stadium, decades before its natural use-by date, while Sydney did demolish a stadium that was poorly conceived, decades before it needed to. Tradition, such as it is, is easily erased (when the taxpayer pays).

14. Construction

The new Everton stadium on the waterfront in Liverpool, England reportedly cost the equivalent of about AUD \$1.6 billion (as well as the forfeiture of its World Heritage listing). It reportedly has a capacity of 53,000 spectators but does not have a full covered roof.

The proponent in Hobart does not appear to have made allowance for a competitive premium in labour and material costs as Brisbane has indicated it is now planning to build new Olympic stadia to be completed by 2031. Delays in the provision of structural elements, in particular, might reasonably be expected as Canberra will surely want Big Construction and Big Suppliers to give the Brisbane Olympics priority (in the interests of Australia’s international reputation).

In addition to this, the tariff regime of the United States of America (and/or the fear of one) may reasonably be expected to fuel inflation and market uncertainty for the next four years. It appears financial contingency is too conservative.

As per the Statutory Rules, 2023 No. 66, (b), (c), (d), the cost estimate of \$1,019 million does not appear to include other work required to finish the immediate precinct including housing, Aboriginal zone, open space, transport or Antarctica facilities.

15. Housing

The proponent estimates 1,221 construction workers will be required.¹³⁹ yet that “it is expected that no more than 100 dwellings would be needed to house workers.”¹⁴⁰ It appears the proponent is confident

139 KPMG Social and Cultural Analysis p. 41

140 KPMG Social and Cultural Analysis p. 34

some 800 construction workers will be available in the greater Hobart area (who will not need to arrange accommodation).

Changes to the “State’s procurement criteria [that has] increased incentives to use more local labour” appear not to have been included in the cost of the development. It is unclear why Big Construction would require any financial incentives to employ local people.

The proponent also noted that the private rental vacancy rate was 1.4 per cent in April, 2024. It is unclear why KPMG did not furnish more recent statistics, as of January, 2025. As of April, 2025, the Hobart vacancy rate was about 0.8 per cent.¹⁴¹

It is implausible to suggest, even at 1.4 per cent as KPMG does, that this “increase in demand [for 100 houses] would not have any significant impact on the cost of rents and the availability of rental properties...”¹⁴² when 232 houses are available, as of April, 2025.¹⁴³

It is arguably specious to refer to the vacancy rates in short-term rentals (understood to mean ‘Airbnb’ accommodation) and hotel rooms as it would be uneconomical for either workers or locals (displaced from their rental homes due to higher rents) to use them.

Despite this, the proponent suggests that it is “unlikely” that “interstate workers” will put “pressure on the already strained housing market in Tasmania” and even if they do the “consequence” of that will be “insignificant”.¹⁴⁴ This is very contentious.

16. AFL Contribution

The panel should consider the risk to the Devils club (and so the Hobart stadium) of the AFL apparently not providing a contractual commitment for its stated contribution. It may be that, in an act of good faith, the AFL contributes its stated \$15 million (possibly 1 per cent of the final stadium cost) before the Planning Commission ‘exhibition’ period concludes (thereby paying for a portion of the consulting work as of June, 2025).

KPMG Cost Benefit Analysis p. 23 says “Investment into Tasmania is assumed to be \$350 million over a ten year period, however, the *KPMG Economic Impact Assessment* p. 8 suggests this amount will be \$335 million (\$33.5 million per year for 10 years).

Curiously, the amount of \$33.5 million is apparently forecast to have an ‘impact on the economy’ of \$32.4 million.¹⁴⁵

It appears the AFL stated \$15 million for the stadium construction will be taken from the \$350 million amount, meaning this portion will **not** be invested in ‘grassroots’ players.

Of the \$335 million, it appears just \$33 million is to “develop young players in new talent academies” while \$90 million is for “game development” which remains undefined.¹⁴⁶

141 <sqmresearch.com.au/graph_vacancy.php?region=tas-Hobart&type=c&t=1> Accessed 27 April 2025

142 *KPMG Social and Cultural Analysis* p. 34

143 <realestateinvestar.com.au/property/tasmania/hobart>

144 *KPMG Social and Cultural Analysis* p. 49

145 *KPMG Economic Impact Assessment* p. 10-11

146 *KPMG Social and Cultural Analysis* Report p. 20

The panel should consider the financial risk of the AFL not actually investing \$335 million to develop ‘Aussie Rules’ in Tasmania.¹⁴⁷

In the interim, the AFL may sign a contract with the Tasmanian Government to ‘lock in’ its stated investment for the next ten years and may make that contract public but if it does not, the panel is surely obliged to consider the probability of the AFL money never arriving in Tasmania.

This speaks to the AFL requirement for a ‘high performing’ team which is apparently the basis for a new stadium in the first place.

If some of that \$335 million is for “70 ovals in Tasmania,” work should be expedited to start in 2025, with Council approval (presumably for landscaping as well as new goal posts). If the AFL has confidence in the future of its game in Tasmania, it should demonstrate it so as to lower the project risk.

17. Positive Impacts Risk Register

It is not clear how or why a register of ‘positive impacts’ can be considered a project ‘risk’.¹⁴⁸ The proponent is, at times, inarticulate.

Claim	Observation
“Capability uplift through new skillsets required to operate the stadium at a scale that does not currently exist in Tasmania.”	Comparable convention venues already exist. Possibly some opportunities for a minor subset of employees responsible for technology.
“Capability uplift through the support for a new professional sports ecosystem for Tasmania, supporting industry talent attraction/retention and pipeline development.”	To the extent this is true, it is only inherently linked to the stadium construction and this specific proposed site due to the AFL ultimatum.
“Likely over 135 AFL roles available for Tasmanians through the new teams and other AFL investment.”	This likely refers to “pipeline development” (of junior players, not plumbing) and is not inherently linked to the stadium.
“Increased confidence in the state, increasing likelihood for further investment.”	Nebulous and unsupported. Business investors likely use statistics to guide their decisions, not emotion.
“Increased business events (104-156 events) allowing for knowledge sharing, innovation and further investment.”	It is very unlikely 2-3 new business events of 250 people per week will exist and that they will all choose the stadium before other venues (without venue price subsidy).
“Potential uplift to surrounding businesses through construction worker spend on the job.”	To the extent this is true (by interstate workers buying meals), this benefit is not linked to a stadium, as such; they could be building a new hotel.
“Increased retention of Tasmanians in Tasmania as they now have access to events they would otherwise need to travel interstate for.”	A minor benefit. Tasmanians who travel to Melbourne for the AFL likely also incorporate shopping and restaurants. Few AFL Melbourne

147 KPMG Economic Impact Assessment p. 8

148 KPMG Social and Cultural Analysis Report p. 41-50

	teams likely to play in Hobart.
“Opportunity for event attendees...to extend their trip.”	Not linked to the stadium. It is probable the average interstate visitor will be required at work or school Monday morning.
“AFL team will likely bring a significant amount of civic pride, with over 190,000 founding members of the Devils.”	Apparently 100,000 members live outside Tasmania so any civic pride will be atomised, throughout the mainland and the world.
“Improved physical and mental health.”	AFL is not the only sport that requires physical exertion. It appears a rectangular stadium catering to basketball, soccer and athletics would be more beneficial for community health.
“Excitement of watching a game live including community engagement from attending the game (i.e. discussions before and after).”	Hobart residents have had the opportunity for years to watch two AFL teams at Bellereve Oval but even though general admission is about \$10, crowd attendance is usually thin.
“Stadium roof can limit disruption related to weather.”	The roof design is not finalised. Acoustics may be worse than open air. EFTE film is translucent, not transparent. Insufficient consideration of birdlife. Insufficient weather testing. Tasmanians are being asked to pay \$100 million for a roof when only one other stadium in the AFL fixture has a roof.
“diverse food and beverage options”	Likely ‘fast food’ with limited nourishment. Diverse food and beverage options are already available throughout inner Hobart. Nourishing food is more likely to be available if a stadium is not built.
“public transport infrastructure and investment”	Does not require a stadium to proceed. Is more likely to succeed if the state government does not borrow \$1 billion to build the stadium.
“...the stadium is an aesthetic improvement on the base case” of a derelict industrial site.	The site has already undergone some repair and remediation and stating that a stadium is preferable to an old industrial site is damning with faint praise. A high-quality mixed-use residential-retail-leisure development would be attractive.

The proponent’s submission of a table summarising “Assessment and mitigation of negative impacts” at 5.2 Figure 7 does not include any criteria. It is unclear how these assessments were made.¹⁴⁹

18. Health and Productivity

The AFL, through AFL Tasmania, is planning a ‘Kicking goals’ schools program to install ‘Aussie Rules’ goal posts in all state government schools by 2028. It is unclear if this is part of an allocated \$1.5 million over three years for community football infrastructure (it is revealing that, in more than a century, neither the AFL nor the Tasmanian government had already done this).

¹⁴⁹ KPMG Social and Cultural Analysis p. 47

This program will not promote AFL participation or even physical activity. KPMG appear to acknowledge this by noting the many social factors that influence exertion and participation.¹⁵⁰

It is understood the AFL did install goals posts at some schools in regional Queensland, whereupon some schools were rumoured to have later added supports and a crossbar between the goal posts and then played 'League, soccer, hockey and lacrosse.

In regards, to 'Auskick' statistics (and extrapolations thereon), it should be clarified whether the word 'participation' means only an actual player on field or whether it also includes attendees at events (that is, someone exposed to 'Auskick' as an associate, friend or relative of a player but does not actually play).¹⁵¹

Peer-reviewed research is academic, in nature. Virgin Media does not appear to be a reliable source, as evidenced by KPMG mistakenly attributing a link between wellbeing and an additional nine years of life expectancy to "fortnightly 'gig' attendance" at stadia.¹⁵²

Even if there was a "collective effervescence"¹⁵³ link, it is arguably much more likely to be the music that created wellbeing more than being in a stadium *per se*. It is concerning the proponent presented such flimsy 'research' and apparently did not question a potential relationship between Virgin Media, Virgin music, stadia and music concerts.

The benefits of physical activity to health may be assigned to any sport; the AFL does not have a monopoly on exertion. A climbing wall or equestrian park (in preparation for the 2028 and 2032 Olympics) would arguably encourage a certain cohort to exercise and produce the same benefits for community health.

19. Natural Values Assessment

The Natural Values assessment does not appear to have considered what birds may do to the stadium roof if they find it attractive for, variously, its warmth, perch, aroma, curiosity, insects (attracted to lights), or orientation nor what the venue operator(s) may do to the birds, in response, if they persist in visiting. On cool, misty evenings, seagulls congregate at the MCG.

In Hobart, birds may include gulls, parrots, starlings, blackbirds, pigeons, sparrows, and raptors, such as owls, hawks and eagles. There may be as many as 4,000 ducks and swans in summer.¹⁵⁴ There also appears to be no assessment of how any birds congregating near the stadium may interact with a passing Hobart hospital helicopter. The stadium is proposed to be just 100m from the air corridor northern perimeter at Hunter St.

The Derwent estuary is a Conservation Area and so a refuge for ducks during the hunting season.¹⁵⁵ It appears this was not yet been properly considered, especially the impact of stadium shadow, noise and sediment on duck feeding grounds.

150 KPMG *Social and Cultural Analysis Report* p. 21

151 KPMG *Cost Benefit Analysis* p. 26.

152 KPMG *Social and Cultural Analysis Report* p. 23-24.

153 KPMG *Social and Cultural Analysis* p. 44

154 *Supervising Scientist Report* 129 p. 28 <[dcceew.gov.au/sites/default/files/documents/ssr129-section02.pdf](https://www.dcceew.gov.au/sites/default/files/documents/ssr129-section02.pdf)>

155 *Supervising Scientist Report* 129 p. 28 <[dcceew.gov.au/sites/default/files/documents/ssr129-section02.pdf](https://www.dcceew.gov.au/sites/default/files/documents/ssr129-section02.pdf)>

20. Tourism

If this proposal is approved, tourism revenue may be adversely affected as mainland- and intrastate Australian tourists and may avoid central Hobart during the construction phase of at least three years. Noise, dust and congested traffic will surely be present most days. Even on a good day, Hobart has congested traffic with about 80,000 commuters.¹⁵⁶

Industrial farmed salmon and the vulnerability of the Maugean skate is beginning to give Tasmania a wider bad name, as it is. These costs of a decrease in tourists as well as congested traffic have not been properly calculated and included in the final assessment.

If the stadium actually succeeds as a football drawcard every week, there is a risk MONA may limit their popular festivals if they conclude the international- and mainland reputation of Tasmania inclines towards gladiator ball games and/or if government support for the Arts declines (whether due to exorbitant stadium subsidies or other reasons).

It is contentious to state, as KPMG does, that “the stadium will result in Tasmania hosting an additional 66,700”¹⁵⁷ when international tourism numbers, especially, may decline due to construction activity, changed reputation, and competitive prices for accommodation.

Once the stadium is completed and the character of Sullivan’s Cove permanently besmirched, it is even possible the Sydney to Hobart yacht race will become the ‘Adelaide to Sydney,’ the ‘Sydney to Phillip island’ or the ‘Sydney to Sydney (with a circumnavigation of Tasmania).’

21. Location

The proposed stadium location appears geographically inauspicious. It compromises reclaimed land sitting above a geographic fault splay. It is indeed unlikely the southern ‘half forward flank’ will ever slide into the Derwent under liquefaction, however, there reportedly was an earthquake somewhere in Tasmania on June 16, 1827 that was of a “hollow rumbling noise” of sufficient intensity to “rattle wine-glasses, doors and windows & c.” in Hobart Town.¹⁵⁸

Liquefaction is more likely on reclaimed land and so a tremor of that historical intensity may mean the stadium would require temporary closure for repairs.

This site is also adjacent to the second-deepest sheltered harbour in the world with depths up to 44m south of the Tasman bridge¹⁵⁹ and, if Kevin McCloud’s ‘Grand Designs’ television program is any guide, building a carpark several meters below the water table, proximate to salinity, is likely going to be particularly expensive and time-consuming.

It will also require up to 140 truck movements per day over a period of *at least* 30 weeks.¹⁶⁰

The AFL seems to think its employees are royalty or diplomats who deserve priority stadium access but that kind of perspective is unlikely to win favour in Hobart.

156 Hobart: A Community Vision for our Island capital. Hobart City Council, 2018 p. 19

157 KPMG *Cost Benefit Analysis* p. 20

158 <aees.org.au/wp-content/uploads/2012/06/Historical-earthquakes-Tasmaniafinal.pdf> cited 9 April 2025

159 <dcceew.gov.au/sites/default/files/documents/ssr129-section02.pdf> p.3

160 Zancon *Construction Management Plan* 14 Feb 2025. p.1

York Park, Launceston has a potential training venue adjacent, Invermay Park, while the Bowls club and carpark could be relocated. If the Devil's team was based at York Park, this would also potentially relieve some demographic pressure on Hobart.

22. Remediation

The Macquarie Point (sic) site is reportedly contaminated with heavy metals, coal tar, phosphorous, sulphur, asbestos, cyanide and hydrocarbons. It is probable that this contamination is heavy as Tasmania has an inglorious history regarding rubbish dumping.

Six lakes are *still* contaminated with lead, copper, arsenic and cadmium to such an extent that they are comparable to the Kurang River in Pakistan and the Shur River in Iran (*Guardian* quoting ANU 8 February 2019).¹⁶¹

Further, "levels of heavy metals in Derwent Estuary water, sediments and seafood are among the highest recorded in Australia, and in many cases exceed national guidelines for zinc, mercury, lead, cadmium, copper and arsenic."¹⁶²

These facts may explain why Tasmania inculcated the world's only contagious cancer, devil facial tumours, either directly or indirectly through mediocre governance.

And the fact that this maligned animal, the largest carnivorous marsupial in the world, is universally referred to as 'devil' partially explains the state government's torpor for 30 years in not properly rescuing the species, *Sarcophilus harrisii*.

Now the Tasmanian state government proposes naming a football team 'devils' and has introduced a spooky mascot to malign this curious, social, resourceful little critter even more. There is nothing devilish about it and in fact is it a unique global treasure.

Curiously, however, when an art museum displays a symbol in Hobart streets during their winter festival, some perceive it to be a Christian cross upside down, the devil's work, and the sky almost falls in. If the devil is not welcome in Tasmania, neither the critter nor the team should be nicknamed it.

The suggestion that the Goods Shed can be disassembled, moved, stored and reconstructed, and then the contaminated site fully excavated and remediated, apparently for \$6.5 million appears delusional.

Any and all contaminated waste will surely need to be completely removed, not capped. It surely would not be wise to plant the foundations of a stadium on or above any amount of waste that may move or degrade at an uneven rate in the future.

23. Separate Project

It is arguable that the complete remediation of the Macquarie wharf site, such as the removal of contaminated waste, the movement of the Goods Shed, sewer lines and electricity cables, as well as

¹⁶¹ <theguardian.com/environment/2019/feb/08/tasmanias-lakes-among-most-contaminated-in-the-world>

¹⁶² <[derwentestuary.org.au/assets/](https://derwentestuary.org.au/assets/Derwent_Estuary_Water_Quality_Improvement_Plan_Stage_2_Heavy_Metals_and_Nutrients.pdf)

[Derwent_Estuary_Water_Quality_Improvement_Plan_Stage_2_Heavy_Metals_and_Nutrients.pdf](https://derwentestuary.org.au/assets/Derwent_Estuary_Water_Quality_Improvement_Plan_Stage_2_Heavy_Metals_and_Nutrients.pdf)> Cited 23 April 2025

construction of public access and bus plaza, should be a **separate** State Government Project of State Significance. This would have its own timeline, budget and approvals process.

This alone would surely be a welcome and proper investment in Hobart's future. This smaller project could potentially be a showcase of urban renewal. The Federal Government may also be encouraged to pay its share if it transpires that the waste is related to the Department of Defence.

The current stadium design proposal, on the other hand, contains elements of urban decay. They may induce or create loitering before and after events (due to the hour waiting for transport) and when the stadium is closed (most days) windy, concrete corridors in shadow with low pedestrian traffic may invite ne'er-do-wells to congregate and litter to accumulate.

24. Noise

It appears insufficient attention has been given to particularly noisy events at the stadium such as monster truck races, dirt bike aerobatics, and music concerts. This includes on residents, animals, birds, and marine life as noise may exceed 75 decibels, considering the roof design is preliminary.

The Derwent estuary is reportedly a recognised Shark Refuge Area as it is a shark nursery.¹⁶³ Shark pups surely do not like sonic vibration.

Under the *Sullivans Cove Planning Scheme 1997* at 13.3 heavy vehicle activity (whether leisure or otherwise) may be a 'prohibited use' of land as:

- (iv) These are uses which will detract from or erode a particular functional character of an Activity Area. An application for a 'prohibited' use must be refused.

This would include the many dozens of trucks laden with soil required to enter and exit the site for Monster truck and dirt bike activity.

25. Design

There does not appear to be sufficient regard for intense weather events, such as storms of more than 150mm and/or hail storms impacting the proposed roof. Recent periodic heat waves in Tasmanian ocean waters in the 2020s indicate Hobart storms will increase in frequency, duration and severity in coming decades. The cost of stadium roof insurance may become prohibitive.

The design of the roof remains incomplete, even though it is one of the most costly elements estimated in excess of \$100 million. The constrained site surely means reactive design alterations will be limited in scope.

Hunter Street is the air corridor boundary for the Hobart hospital helipad which requires a height limit of 64.5m. The preliminary design is 54m (51m plus 3m playing surface will be above street level). If helicopter noise threatens to interrupt a television broadcast, will helicopter use be curtailed?

It is not yet clear how many layers of EFTE film will be applied to the roof and what level of insulation (acoustic or temperature) will be desired, required or possible (requiring pumps). It is also unclear if this translucent material will retard playing surface grass growth at the latitude of Hobart

¹⁶³ Marine Solutions submission p. 14

(suggesting the possible incorporation of artificial Astroturf) or whether it might be particularly dangerous in the event of a fire.

KPMG assess a roof as a positive feature as it “helps to mitigate the disruptive influence of the weather” and so athletes can *perform* in a “predictable and stable environment”. This would actually remove an appealing feature of the AFL, the unpredictable influence of the elements which, together with the unpredictable bounce of the ball, provides a strong egalitarian element where even smaller, lighter players have an opportunity to excel.

Bellerive has a particular advantage in the AFL as it is usually windier and colder than the average mainland stadium, meaning a roof would remove the Devil’s natural home-ground advantage (while a roof satisfies television broadcasters who prefer indoors because inclement weather makes broadcasting more expensive and ball use less skilful and slower).

A roof suggests both the Devil’s players and spectators are soft and sensitive and this would not accord with playing footie on gravel at Queenstown. Docklands is the new Melbourne way, it is not the Tasmanian way.

There does not appear to have been any financial analysis on the *cost* of a roof to the AFL team nor the cost of the roof to Australia’s cricket reputation.

The Tasmanian state government reportedly paid North Melbourne coach Alastair Clarkson \$100,000 to “investigate global stadium options.”¹⁶⁴ This amount does not appear to have been included in the cost of the ‘build’.

26. Identity

The City of Hobart has a unique physical identity in Australia and a rare profile in the world. It is arguable that many people do not notice the views and the architecture until they are obstructed. The enjoyment of local streetscapes, local weather patterns and local customs may not be fully appreciated until they are interrupted, eclipsed or lost. Hobart is one of the few cities at pedestrian scale.

Hobart City Council’s vision emphasises the word “breathes” and it notes that “connections between nature, history, culture, businesses, and each other are the heart of our city.”¹⁶⁵

The proposed stadium will be physically- and psychologically claustrophobic because its height and size will mean it is an overbearing, industrial monolith. The inclusion of acres of heritage hardwood in the design may mitigate the homogeneity and Stalinism of structural concrete but it is undeniable that a stadium at this site would permanently reconstitute the idea of home for all citizens in the greater city.

The idea of home is the bedrock of resilience and a cornerstone of identity.

The idea of History, which informs the idea of Home, is of particular importance as Sullivan’s Cove was the landing place of Lieutenant Governor David Collins. It remains the *natural* landing place of yacht races, big and small and this site remains a working port.

164 <abc.net.au/news/2023-04-27/afl-stadium-hobart-james-sicily-new-team-needs-to-grow-in-tas/102271578>

165 City of Hobart Capital City Strategic Plan 2023 p. 11

The proponent's suggestion that "the events, and place-led experiences fostered by the Stadium and its supporting landscape will enhance a visitor's perception of the place as a place of social and cultural expression and vibrancy"¹⁶⁶ is contentious because the stadium will not be a magnifying glass.

It will not "enhance" perception but distort it and so alter the experience of the citizen in their small city. Hobart will inevitably be less friendly, as a result, because that alienation of the citizen from their environment is inevitable when pedestrian-scale landscapes are eclipsed by giant techno-industrial sites.

The Eiffel Tower was meant to be temporary and for the very good reason of maintaining a social- and aesthetic equilibrium in a city that showcases widespread architectural beauty exactly because it originally had a strict height limit. Paris will look better and will offer the pedestrian, all Parisians, a more pleasing experience when the tower is dismantled.

Dr. Gruen's suggestion that 5 per cent of Hobart residents would experience 'visual disamenity' and that it should be quantified \$100 per year (or about 27 cents per day) for a total of about \$1 million. This appears derisory considering the stadium would be seen by the majority of residents everyday.

It is more likely that about 95 per cent of Hobart residents either visit central Hobart at least once every year or would see the *disproportionately* large stadium from where they live. It is more probable that 50 per cent of the population of Hobart were raised locally¹⁶⁷ and that all of that all of those residents, at least, would experience some degree of 'visual disamenity' everyday.

For reasons unknown, Dr. Gruen thought it appropriate to consult a panel of "urban design professionals" to provide a "snapshot of professional opinion" about the visual impact of the stadium. This appears specious.

It is unknown why the opinion of a 'professional,' such as a collection of landscape architects, may be any more legitimate than any other resident of Hobart who will have to live with the stadium everyday, especially given just 3/20 respondents lived in Tasmania and 4/20 said they had "reasonable knowledge of the proposed stadium."¹⁶⁸

Survey research might properly ask at least 1,000 Hobart residents of their reaction to accurate indicative images or 'conceptual renders' (based on mathematics), including the degree to whether they would expect to be alienated from their city home as they have known it or whether they expect to welcome the new landscape. Only then can a financial quantum be properly estimated.

This estimate may later be assessed by whether local residents move from the city (or from the state) and whether they recommend the city as a tourist destination (as well as all the other recognised metrics used to measure community health and well being).

Homogeneity in architecture and blandness in concrete construction arguably fuels mediocrity and conservatism and eclipses individual creativity and so does **not** promote sound mental health. Hobart City Council's 'Vision statement' says "We resist mediocrity and sameness."¹⁶⁹

166 Urban Design Framework page 3.

167 28 per cent of people were born overseas. *City of Hobart Capital City Strategic Plan 2023* p. 4

168 Nicholas Gruen *Independent review of the Macquarie Point stadium* 1 January 2025 p. 51

169 City of Hobart Capital City Strategic Plan 2023 p. 11

The cost of ‘visual disamenity’ may be better estimated as \$10 per day for 50 per cent of the population. Stadia are industrial sites that belong proximate to zones of industry.

While Dr. Gruen applies the idea of ‘visual disamenity’ to 5 per cent of Hobart residents over the age of fifteen, he appears to apply the ‘non use value’ of the stadium to *every* Hobart resident “aged 15 and over”. (p. 112). It is unclear why there is an apparent inconsistency of 95 per cent of Hobart residents in these two estimations.

The ‘non use value,’ which is defined as “the value Hobart residents enjoy as a result of having the stadium available even if they do not use it” is estimated as \$10.85 per Hobart resident, for a total of approximately \$20 million. Apparently, this is a theoretical value although it is not clear how this theory might become ‘black ink’ on a ledger. The ‘red ink’ is the money required to operate the stadium everyday.

In other words, it appears Dr. Gruen and the proponent’s consultants suggest that the ‘non use value’ will be twenty times higher than the ‘visual disamenity’ cost. This would seem to imply that 95 per cent of Hobart residents are expected to have an enthusiasm for stadium activity (or the revenue they *perceive* it to generate) that eclipses any concerns they have about its appearance by a factor of twenty.

This is very unlikely. First, it is unlikely that any Hobart resident will be allowed to use the space freely anytime they feel inspired to kick a football with their children after school (meaning the idea of such a thing cannot exist, inducing melancholy) and second, loyalty for the Devils team will not be undiluted as most Tasmanian families who follow AFL have been following an interstate team for about 100 years.

Anyone who *identifies* as a Collingwood or Hawthorn supporter will be unlikely to place an intrinsic value on a Hobart stadium if the Magpies do not use it (one Brisbane resident is *starting* to think of putting the Lions above the Bombers, after living there for 49 years).

It appears there is a hidden presupposition that a stadium (and everything that might occur in one) is a good thing for every city to have, no matter the human- and physical environmental cost. A stadium does give a city additional options (while arguably removing many others) but these may not always be to the benefit of the populace as stadiums can be quickly converted to detention facilities (for example, Paris, 1941 or New Orleans, 2005, to quietly limit the availability of hurricane victims to speak to the media).

A stadium is a closed and introspective barrier and it is inevitable it will colonise the psyche of the local residents. Melbourne, in particular, has virtually become a one-dimensional town as evidenced by the report that there are no fewer than 17 ‘post mortem’ football television programs broadcast in the days following each round of matches.¹⁷⁰

27. Insufficient Regard

The stadium proposal appears to have been formulated without proper regard for the *Macquarie Point Development Corporation Act 2012*. Specifically, the “principal objectives of the Corporation” Part 2, Division 1, 6

- (b) to plan, facilitate and manage the redevelopment of the site so as to ensure that the site –
 - (i) is redeveloped as a vibrant and active area, with a **mix** of uses, that connects with and

¹⁷⁰ *The Age*, March, 2025.

- complements adjacent areas** within Hobart; and
- (iia) **encourages** pedestrian and **bicycle traffic**; and
- (iic) provides for **public open space**; and
- (iii) is redeveloped so as to deliver **sustainable social and economic benefits** to Hobart; and
- (iv) is redeveloped in accordance with **sound planning, urban design** and environmental principles; and

(c) to the extent practicable, to make a **profit** from carrying out its functions.

28. Heritage

The stadium proposal appears to disregard the *Sullivans Cove Planning Scheme, 1997*. This scheme arguably represents the spirit of the *Sullivan's Cove Planning Act 1995*, including at Schedule 2

- (b) to provide protection for and to promote public awareness of Sullivans Cove as a unique example of an Australian historic waterfront
- (c) to ensure that Sullivans Cove continues to be a unique historical site that is predominantly in authentic condition and will be used for commercial, cultural, residential, port and recreational purposes; and
- (d) to ensure that the cultural significance and historical integrity of Sullivans Cove will be preserved; and
- (e) to ensure that any development in Sullivans Cove will be in sympathy with the area's heritage and its continued use by the Tasmanian community.

The *Sullivan's Cove Planning Scheme, 1997* has a clear basis, reflecting *Sullivan's Cove Planning Act 1995, Schedule 3*

1. Basis of the scheme

1.3.1

- (b) Contains buildings, monuments, structures and spaces reflecting the history and development of Tasmania and establishing a unique precinct which must be developed, enhanced or preserved in a manner consistent with its historical character;

3. The Planning Scheme must:

- (b) Have regard to the objectives and principles of:
 - (i) The Sullivans Cove Planning Review 1991, Sullivans Cove Development Authority...
 - (iii) The Sullivans Cove Traffic and Parking Management Strategy 1995

5. The values and strengths of the cove

“Sullivans Cove is recognised as a special place by the people of Tasmania. Set against the dramatic backdrop of Mount Wellington, with Hobart City Centre in the foreground and opening out to the Derwent Estuary, Sullivans Cove is one of the world's *finest city landscape settings*. This unique urban and landscape form is what makes Sullivans Cove so special.

Not only is Sullivans Cove Australia's most *intact historic waterfront* - it also remains a true dynamic and evolving *working port*. The operation of cargo vessels remains a key economic activity of the City, as well as defining the unique character of Sullivans Cove...

The diverse marine activity in the Cove presents an ever-changing environment to residents and visitors alike.

The Cove is a *place for people* - its historic buildings, formal parks, roads and other public spaces have largely retained the pedestrian scale that existed during the early settlement of Hobart.

Sullivans Cove is a *cultural, artistic and festive* focus for the City, and its public spaces are frequently used for market and other public events. Pedestrian access to the water's edge is a unique feature of the Cove.

The Cove also offers a diverse range of activities for residents and tourists alike. A broad range of recreational and social activity options exist - from restaurants and bars to ferries, fishing off the pier and boating with its associated facilities.

The Cove contains a thriving artistic and education base, including the University of Tasmania, CSIRO and a range of artist studios and galleries."

7.3.5 Economic Development Principles

"The future economic development potential of the Cove is recognised as being closely tied to the protection and development of the Cove's unique character- its cultural heritage, pedestrian amenity, community focus, accessibility and aesthetics.

The Cove shall continue as a government, administrative, financial and judicial focus for the State."

7.3.6 People in the Cove

The Cove is to be promoted and developed as an attractive pedestrian environment.

The proposed stadium, as a centrepiece of the precinct development, is akin to a concrete blister.

It would dominate the Hobart landscape, from near and afar, at the expense of every other facet of it. This includes the Hobart cenotaph which will need to and will want to move, if this project proceeds.

29. AFL Probity

The Premier, including with power over himself as a person representing the Crown in Right of Tasmania, has extolled the Australian Football League (AFL) as an important partner to the project.

In fact, the amount of financial subsidies provided to the AFL by the State Government indicate the AFL is more of a beneficiary, than a partner, although it does retain some cultural attraction.

Unfortunately, the standards of governance at the AFL has been gradually declining during the past few decades and it is now arguably mediocre. AFL probity is important as the AFL ultimatum 'No new roofed stadium, no Devils team' is widely known in Tasmania but it is also clear there is no Devils team without the AFL.

The AFL arguably has a symbiotic entanglement with the gambling industry (see *Australian Gambling Statistics Report*). It also has a dubious institutional history with the use and normalisation of illegal drugs. Some other institutional issues are addressed by Michael Warner in his book *The Boys' Club* (Hachette, 2021).

Specifically, some of these institutional issues include privilege, sexism, unreliability, accountability, deception, miserly, profligate, elitist, and controlling.

Privilege

Male coaches and male players and signed to multi-million dollar contracts when future performance cannot be guaranteed (for even one month, let alone three years) and even though all AFL players work in a 'closed industry.' There is virtually no other competition for their signatures, either domestic or internationally, at this level of remuneration.

In 2024, there were more than 100 male players receiving remuneration of more than \$700,000 per year and 25 of them earned more than \$1 million per year.¹⁷¹ These 100 players are, on average, being paid about \$1,000 each time they touch the football, a truly remarkable figure in a team sport.

In April, 2025, there was open discussion that a male potential St. Kilda player may be offered a contract with remuneration of \$1.7 million annually, for seven years.¹⁷² That would amount to about \$74,000 per match, or each match remuneration equivalent to the Australian median annual salary.¹⁷³

This is truly remarkable considering this team, St. Kilda, a foundation club no less, has an unparalleled culture of failure for more than 125 years.

This unconscionable distortion in Australian society is due, in part, to the Federal taxpayer subsidising major stadium redevelopments with hundreds of millions of dollars in Melbourne, Geelong, Sydney, Perth and Adelaide.

Additionally, several hundred million dollars was gifted to the AFL during the global pandemic, as if these multi-millionaires had suddenly been made homeless, like the 441 actual homeless people in Hobart.¹⁷⁴

It is also arguably due to the AFL privileging the male players of its premier league, literally at the expense of female players, regional leagues, junior players, indigenous players, school development, Tasmania, and Western suburbs. This may explain why male players and coaches are keen to sign employment contracts of five- or even ten years duration. This grossly unequal dispersal of its annual revenue would surely not be tolerated in most other industries listed on the stock exchange.

Sexist

The AFL refuses to pay its female players on parity with its male players. It appears the AFLW remuneration rates are so embarrassingly unequal they are not even listed in the 2024 annual report. If

¹⁷¹ *AFL annual report 2024* p. 45

¹⁷² 'The Agenda Setters,' Channel 7, April, 2025.

¹⁷³ <abs.gov.au/statistics/labour/earnings-and-working-conditions/employee-earnings/latest-release> cited 23 April 2025

¹⁷⁴ *City of Hobart Capital City Strategic Plan 2023* p. 5

each female player earns, on average in 2025, \$60,000 per season,¹⁷⁵ that would equate to about 1/8 of the minimum male player annual payment.

Many AFL commentators who abhor violence (whether on the field or off) are apparently silent on the issue of remuneration inequality, a root cause of misogyny. To minimise its financial investment, the women's season is about half the length of the men's season. It is also scheduled in less suitable weather with most of the matches scheduled in spring. The team colours and mascots were not original, inspired by or created by local communities, but are simply copies of the men's teams.

It is not known if the Tasmanian contract with the AFL stipulates that all Devil's players, female and male, will be paid equally.

Unreliable

On the point of crowd attendance, it is worth noting that the website <afltables.com/afl/afl_index.html> appears unreliable as crowd attendance data provided for a random sample of about 25 historic matches does not correlate with contemporaneous newspaper match reports (when VFL officials apparently counted every individual who walked through the turnstiles up to 'three-quarter time'). It appears <AFL tables> sometimes ignores mathematical convention and 'rounds up' to the next hundred or next thousand, no matter how low the numeral reported in the contemporaneous news media. This is unprofessional, at best.

Unaccountable

Despite having an ABN number, the remuneration of the Chief Executive Officer (CEO) was not disclosed in the 2024 annual report proper (the notes to the report do not appear to have been published). This is extraordinary. It is thought the CEO's salary is approximately \$12 million per year, based on a superannuation entry in the notes of a previous AFL annual report.

Deceptive

The 2024 AFL annual report lists 'viewership' as 140.18 trillion although it is unclear if this refers to people or minutes and whether or not it includes the AFLW statistics.

The use of a number that could be (mis)interpreted with a comma or a period is too-clever-by-half and reveals a corporate mindset that has a sophisticated understanding of deception. It invites a closer examination of the language, statistics and graphics on every other page of the annual report.

It is unclear how 'viewership' differs from 'ratings' (television and online) but it is likely the number in plain English was 140.18 million or about 50 minutes per Australian per year.



175 <afl.com.au/news/1036866/big-pay-rises-40m-boost-for-past-players-in-historic-afl-and-aflw-joint-collective-bargaining-agreement>

Miserly

The AFL allocated about \$1.3 million to ‘Corporate Social Responsibility’ programs¹⁷⁶ or about 0.1 per cent of 2024 AFL Group revenue¹⁷⁷. It appears some and possibly all of this total was in value, rather than money, as it included ‘ticketing’ for fans to ‘connect’ with the game (who otherwise could not) as well as ‘merchandise’.¹⁷⁸ This would equate to providing about 2,000 free Docklands or MCG stadium tickets each week during the regular season.

It appears the AFL understands its moral obligations as a ‘corporate citizen’ as providing tickets at cost (that would otherwise not be sold) to people in a lower socio-economic demographic to encourage them to remain ‘connected’ so that they don’t develop a genuine interest in another sport, such as Rugby League.

Profligate

There was arguably no greater example of the unaccountable profligacy of the AFL than when it scheduled matches to be played internationally, in China and New Zealand.

If these matches were an attempt to ‘win hearts and minds’ of the locals and ‘open up new markets’, they were very predictable debacles, a diplomatic embarrassment, and a remarkably poor return on investment of \$6.7 million.¹⁷⁹

It is not known if ‘International metrics’ were included in the ‘performance criteria’ of remuneration contracts of any senior AFL executives.

Despite spending hundreds of millions of dollars on four clubs in the foreign territories of New South Wales and Queensland for up to 40 years, AFL matches likely attract more ‘expatriate’ southerners than ‘native’ residents.

The poor return on the exorbitant price of acculturation, subsidised by Federal and State governments at the expense of Health, Education and Housing for decades, is perhaps revealingly summarised by Melbourne AFL media who consistently *still* refer to clubs outside Victoria as ‘interstate teams’.

Elitist

Despite the loyalty and sustained financial commitment of club supporters, the AFL locks up about 60 per cent of all tickets to the Grand Final, about 60,000 seats, for patronage.

Sponsors are allocated Grand Final tickets at the start of the season, possibly numbering in the hundreds each, that then become an informal currency. At least one Victorian ‘tradie’ company uses a handful of them as workplace incentives throughout the year.

This shameful contempt for community values has been tolerated by the Victorian State Government for decades. It appears it has been tolerated by every club as it is understood that free Grand Final tickets are included in the employment contracts of *all* players, regardless of whether their team plays in the finals, let alone the Grand Final.

¹⁷⁶ AFL 2024 annual report p. 31

¹⁷⁷ AFL 2024 annual report p. 156

¹⁷⁸ AFL 2024 annual report p. 121

¹⁷⁹ AFL 2024 annual report p. 156

Alienated plebeian supporters of one of the two competing teams who do not win a club ticket lottery for one of 20,000 seats may buy a ticket 'package' for about \$2,500.

The predictable result is that the atmosphere at the Grand Final is always genuinely muted as 60 per cent of the crowd really do not care who wins and who loses. They are arguably there to be seen and to bolster their social cache. The AFL attempts to hide this embarrassment by allocating the 40,000 club seats behind the goals (and so in view of television cameras during every score).

Grand Final ticket revenue and sponsor dollars help to 'offset' the exorbitant AFL salaries. It is surely the only Australian company that pays its top 800 employees, all executives and male players, a minimum of \$493,000 per year.

Controlling

ANZAC Day has been appropriated so that it is now ANZAC long weekend and, depending on the calendar, spans four consecutive days, Thursday through Sunday. The effect is to dilute April 25 in the popular imagination.

The fact that other clubs want to commemorate the ANZACs on other days suggests it is a marketing activity designed to promote the AFL and the clubs, not ANZAC day as such.

The AFL could schedule more than two matches on ANZAC day but chooses not to in order to maximise ticket revenue and television ratings. It appears the AFL tried to exploit ANZAC Day as a vehicle into the New Zealand 'market'.

30. Conclusion

It appears the proponent of this proposal, which can only be properly referred to as an exorbitant and intrusive eyesore, has been unduly influenced by ethnocentric Melburnians who mistakenly think that specific features of their smoggy, congested, introspective concrete jungle should be and can be imposed on Hobart.

A concrete blister in the centre of Hobart will permanently alter the city's character, for the worse.

While some of these Melburnians may be looking for the next business opportunity to sell hamburgers at 'half time', it is probable that most of them are motivated with an altruistic ideal but, at the same time, are ignorant of Hobart's people, lifestyle, geography and history.

It appears others care not for proper town planning and the principles of human- and physical geography and only want a long sausage of tradie work, regardless of the human- and financial cost to a city, the environment and future state budgets.

An ignorance of Tasmania is arguably common in Victoria. Some Victorians have been heard to say 'You can drive around Tassie in a weekend,' apparently ignorant of the fact that the most direct route from Smithton to Southport is 500km.

In a similar vein, Channel 7, the ‘home of AFL,’ frequently ignores Tasmania when it makes special announcements about variations to its broadcasts.¹⁸⁰ Meanwhile, Tasmanian school students ask, in all innocence, ‘Why do Victorians say we’ve got two heads?’

In 2023, the Hawthorn captain, presumably a frequent visitor to Launceston, at least, and refreshingly candid, reportedly thought that few players would want to move to Tasmania because for [young guys], “there’s not much happening down there...”.¹⁸¹

These words were arguably representative of a broader Victorian community that believes:

- 1) that Tasmania does not have a sufficient number of talented players to field its own team despite sending some 300 players to the AFL over about 100 years¹⁸²
- 2) that the world ends at Port Phillip Heads and that 300km of northern Tasmania coastline is not just over the horizon but way *down* near Antarctica
- 3) that “happening” means a ‘nightclub,’ and not climbing across Federation Peak.

The fact that every Tasmanian airport is an hour from Melbourne is arguably easily overlooked when there is a pejorative mindset. That is the mindset apparently common in AFL headquarters.

The AFL has virtually ignored Tasmania for more than 100 years because it (incorrectly) assumed it was not in its economic interests to make any commitment to this state. It has very rarely (and possibly never) even scheduled one AFL official match in Tasmania (for four points), before it was induced to do so with considerable state government financial subsidies.

This mega-project proposal has serious deficiencies -

1. Costs have been substantially miscalculated and misrepresented
2. Benefits have been substantially overstated
3. Damage to the environment, including noise and size, has not been properly considered
4. Visual artistic representations are very misleading
5. The AFL is rapidly becoming a stale, expensive product in Tasmania
6. AFL ultimatums dilute the club reputation. It can thrive at York Park. Tasmania can thrive without it.
7. The majority of club members live outside Tasmania

For these reasons and more, above, these proposal should be immediately rejected.

I consent to this submission being made public. I reserve the right to remain anonymous as it is understood that this submission will be published on the internet, which is to say now, copied and digested by foreign Artificial Intelligence (AI) scanners. I hope you consider this reasonable.

Yours faithfully,

180 Channel 9 is the same when it broadcasts the tennis.

181 <abc.net.au/news/2023-04-27/afl-stadium-hobart-james-sicily-new-team-needs-to-grow-in-tas/102271578> Accessed 28 April 2025

182 *AFL Licence Taskforce Business Plan* 2019 p. 20