

Department of Premier and Cabinet GPO Box 123 Hobart TAS 7001

16 June 2025

Response to Enabling Legislation for the Macquarie Point Multipurpose Stadium

Thank you for the opportunity to comment on the draft Macquarie Point Planning Bill 2025 which we believe is a good opportunity to critically assess the stadiums construction and its potential impacts on the Derwent Estuary.

Derwent Estuary Program (DEP) interest in the Enabling Legislation for the Macquarie Point Stadium

Stormwater quality and its management has emerged as a topic of interest for both the DEP and our partner councils as it affects community and environmental health. The DEP recently completed a comprehensive monitoring program to assess stormwater quality throughout the greater Hobart region. Results of the monitoring highlighted that stormwater is a major source of contamination that flows untreated to the Derwent Estuary.

Water Quality - targets

The State Stormwater Strategy 2010 in addition to the DEP's Tasmanian Stormwater Policy Guidance Document outline treatment targets for stormwater including nutrients, sediment and gross pollutants. As discussed in the current draft enabling legislation report for the stadium, we note that meeting water quality objectives are currently not feasible which is disappointing. The DEP would like to see a project of this magnitude take a leadership role in prioritising meeting water quality and quantity treatment targets and we urge the proponents to review the stormwater management plan, so these shortcomings are addressed.

We note reference to an estuarine water quality monitoring plan in the draft project permit. Is there an opportunity for the DEP to be involved in this in some capacity? The DEP has over 20 years of estuarine water quality data (valued at over \$2 million), including at sites near to the proposed stadium which is available free of charge to inform estuarine management.

Erosion and sediment control

Sediment from development and construction sites in Hobart, particularly during the bulk earthworks phase is a significant pollutant in stormwater that reaches the estuary. Excess sediment in waterways is visually displeasing, smothers habitats

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restricting fish species recruitment including popular Tasmanian recreational species and compromises infrastructure by exacerbating flooding.

To support best practice erosion and sediment control, the DEP has invested in the upskilling of regulators and contractors with targeted training and through the creation of resources such as our erosion and sediment control manual (Best practice erosion and sediment control booklet 2022). We encourage the use of these resources in delivering the Construction Environmental Management Plan.

We see the stadium project as an opportunity to demonstrate best practice erosion and sediment control in Tasmania (as was done during the construction of the Bridgewater Bridge), to encourage implementation of sediment and erosion control by developers at local scales and smaller projects to ultimately reduce sediment pollution.

Stormwater a resource

Stormwater could be captured to reduce the reliance of this development on the potable water supply and instead be used to water turf and/or gardens or used to flush toilets. Will plans consider this opportunity? There is also an excellent opportunity to make use of wastewater as reuse instead of potable water, given the proximity of TasWater infrastructure at Selfs Point. Can this also be investigated?

Summary of DEP comments for the Macquarie Point Multipurpose Stadium Legislation

- 1. The DEP highlights the critical need for a standalone Erosion and Sediment Control Plan and regulation during construction as seen during the construction of the new Bridgewater Bridge. This could be captured as part of the planning permit and the Construction Environmental Management Plan.
- 2. Stormwater quality targets outlined in the State Stormwater Strategy 2010 should be outlined in a detailed stormwater management plan for the site, noting the current draft reports suggest these targets cannot be met. For a project of this scale these targets should be assessed as a minimum threshold. If they are not to be met, what criteria will be used instead to measure water quality?
- 3. We recommend assessing the feasibility of using stormwater and/or reuse to reduce the need for potable water for things like watering turf and gardens and flushing toilets.
- 4. The DEP will continue to share information, water quality data, tools and work with projects proponents as required to help facilitate best practice

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water quality and sediment management. Please contact us about this as required.

Thank you again for the opportunity to comment on the Macquarie Point Planning Permit Bill 2025. Our submission emphasizes the importance of addressing water quality impacts associated with any proposed development at the site. We encourage proponents to use this opportunity to demonstrate best practice stormwater management and water use, showcasing to the Tasmanian community how sustainable development can be achieved.

Please contact me if you have any questions about the DEP submission.

Yours sincerely,

Ursula Taylor

Derwent Estuary Program, CEO

About the Derwent Estuary Program

The Derwent Estuary Program (DEP) is a science-based not-for-profit that coordinates monitoring and reporting of the environmental condition of the Derwent estuary from New Norfolk to the Iron Pot light, as well as the River Derwent catchment upstream of New Norfolk. There are several challenges to the estuary's health including historical heavy metal contamination, increased nutrients particularly in the upper estuary and pollution from a variety of point sources such as wastewater treatment plants and industry and diffuse sources that arise from urban and agricultural catchments. Stormwater is a significant source of pollution to the estuary including gross pollutants, sediment, pathogens and nutrients which can degrade water quality and aquatic habitats.

Our major sponsors include Brighton, Clarence, Derwent Valley, Glenorchy, Hobart and Kingborough councils, the Tasmanian Government, Nyrstar Hobart, Boyer Paper Mill, TasWater, TasPorts, Hydro Tasmania, EPA Tasmania, NRM South and IMAS. Since March 2017, the DEP has been operating as a registered not-for-profit company, with an independent board.

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