To whom it may concern,

While we appreciate the opportunity to make a submission, we note that only three weeks were allowed for consultation¹, which does not seem proportional for such a significant infrastructure project, and that **the enabling legislation was introduced to Parliament less than halfway into the stated consultation period**². There is an enormous amount of documentation to wade through to understand what's involved - the timeframe should be extended if anything. The comments in this submission reflect our current understanding of the situation.

We write this submission in good faith that it will be considered at some point in the process.

We disagree with the current proposal for a new stadium at Macquarie Point in principle for a myriad of reasons, outlined below, however have specifically addressed the legislation on page 17.

Stadium not required

Firstly, a new stadium was **not** required for an AFL team, as revealed by former Premier Peter Gutwein on the 7.30 Report in 2022³. This should be given more weight in any future discussion - it is possible to have a Tasmanian team without a new stadium.

Minister for Business, Industry and Resources Eric Abetz, who is responsible for delivering the stadium, has suggested it is possible to go back to the table. "Is there the possibility of renegotiating? Well, you never say never".⁴

Unfair contract

The contract signed in 2023 by Premier Jeremy Rockliff and then-CEO of the AFL Gillon McLachlan (now CEO of major gambling company Tabcorp) is a very poor deal for Tasmania in just about every respect.

This particular section⁵ is one of the most concerning:

19.4 Stadium Specifications

If, on Practical Completion of each of the TA Facility and the Stadium, the independent certifier appointed by the Tasmanian Government does not certify that the TA Facility or Stadium has been built in accordance with the TA Facility Specifications described in Schedule 9 (TA Facility Specifications) or Stadium Specifications described in Schedule 10 (Stadium Specifications) (as applicable), the AFL may terminate either or both of the AFL Licence Agreement or AFLW Licence Agreement by providing written notice to the Club and the Tasmanian Government.

This means the AFL could back out and terminate the licence agreement even after a new stadium is built.

www.tas.gov.au/dpac/macquarie-point-multipurpose-stadium-consultation/online-submission-portal

www.parliament.tas.gov.au/bills/bills2025/macquarie-point-planning-permit-bill-31-of-2025

³ www.youtube.com/watch?v=ONM6bbmwrnA

⁴ www.abc.net.au/news/2025-05-21/hobart-afl-stadium-debate-abetz-macquarie-point/105319258

⁵ www.stategrowth.tas.gov.au/ data/assets/pdf_file/0008/435572/Club_Funding_and_Development_Agreeme_nt_- Signed_3_May_2023.PDF (p.21)

No prior consultation

According to Hansard, "[The Premier] signed us up to a stadium in that location in that design, and every single dollar of cost overruns, without consulting Treasury, without consulting his own Cabinet, and without consulting the Tasmanian people". This seems extremely irresponsible?!!

Unprecedented

No other state has had to fund a new stadium to receive an AFL licence.

It's almost as if the AFL never wanted us to have a team

Tasmania has been overlooked for many years by the AFL.

Despite Tasmania putting forward all of the credentials for a licence, former CEO Andrew Demetriou patted former Premier David Bartlett on the head and said, "You've ticked all the boxes, you're still not getting a team".

There is a chance this could happen again.

It is probable that the unreasonable demands of the AFL such as the stadium were to put us off and make it as difficult and expensive as possible.

The AFL seems to have undue influence over Tasmania - it seems crazy that we let them continually pull the strings and walk all over us.

Existing stadiums host AFL

Tasmania has hosted AFL for many years, with our existing stadiums being good enough for Hawthorn and North Melbourne.

The proposed new stadium will hold 23,000. Both Bellerive Oval⁸ and York Park⁹ have capacity for 19,500 people. For the sake of 3,500 people (assuming a sell-out), is it really worth it?

All this for just seven home games a year in the new stadium 10?

York Park upgrades

York Park is currently being upgraded. The Minister for Sports and Events, Hon Nick Duigan MP, was even spruiking this as recently as 15 April 2025 in a media release, stating, "This revitalisation project will ensure UTAS Stadium will continue to host world-class events, inspiring the next generation of sporting stars and reinforcing Tasmania's status as a

⁶ www.parliament.tas.gov.au/house-of-assembly/chamber-proceedings/proceedings/2025/may/house-of-assembly-7-may (p.45)

www.theage.com.au/sport/afl/rude-afl-supremo-blocked-tassie-bid-20120321-1vkbt.html

⁸ www.afl.com.au/venues/7

⁹ www.afl.com.au/venues/4

¹⁰ www.abc.net.au/news/2024-09-19/tas-macquarie-point-hobart-stadium-afl-sports-matches/104342206

premier destination for major events and sporting excellence"¹¹. The \$130 million upgrades (which is nothing to be scoffed at), of which stage one of two has been completed, have received positive feedback from the Hawthorn Football Club.

York Park is a more central venue, which will make access for northern Tasmanians easier. It is not in a fully built-up area and has room for expansion and extra parking. The Premier also claimed that York Park has "the best playing surface in the country by any measure". Why overlook this option?

New stadium won't be ready for the Devils, even if delivered on time

Assuming the new stadium is completed on time without any hurdles or delays, this will be achieved by the end of 2028 ("The stadium is to be operational by 31 December 2028, but no later than 31 December 2030" 13). The Tasmania Devils are set to enter the league in 2028, meaning they won't be able to play in the new stadium anyway. If it's okay for the team to play elsewhere for the initial year (and potentially longer), surely it must be okay going forward?

We note that there may be some cost involved with playing at alternative venues as listed in the contract, which we assume would be activated in this case (again - seems to be an unfair requirement of the contract¹⁴).

5.9 Stadia compensation

- (a) If Stadiums Tasmania is unable or unwilling to provide the AFL and the Club with Equivalent Stadium Access Terms and despite this the AFL still elects to schedule the relevant match at the Alternative Stadium then the AFL will within 30 days of the relevant match calculate and notify the Tasmanian Government of the:
 - (i) actual revenue generated for the AFL and the Club by playing the match at the Alternative Stadium and by providing, on an open book basis, full details of all costs and expenses incurred and revenue generated by the AFL and the Club on that match day in respect of playing the match at the Alternative Stadium (Actual Match Revenue); and
 - (ii) expected revenue that the AFL and the Club would reasonably have expected to generate for the AFL and the Club by playing the match at the Alternative Stadium on Equivalent Stadium Access Terms (Expected Match Revenue) and by providing a reasonably detailed comparison between the Actual Match Revenue and the Expected Match Revenue,

(Matchday Revenue Shortfall Notice).

- (b) If the Actual Match Revenue is less than the Expected Match Revenue (Matchday Revenue Shortfall) then the Tasmanian Government agrees to pay the AFL an amount equal to the Matchday Revenue Shortfall within 14 days of the provision of a Matchday Revenue Shortfall Notice and the AFL will pass onto the Club that portion of the Matchday Revenue Shortfall that the Club would have been entitled to had the match at the Alternative Stadium been held on Equivalent Stadium Access Terms.
- (c) For the avoidance of doubt, if the Actual Match Revenue is more than the Expected Match Revenue, then neither the AFL nor the Club will have any obligation to pay the Tasmanian Government the difference.

¹¹ www.premier.tas.gov.au/latest-news/2025/april/utas-stadiums-stage-one-upgrades-given-tick-of-approval

¹² www.linkedin.com/posts/jeremy-rockliff_the-best-playing-surface-in-the-country-by-activity-7263300915837771776-CXhJ/

¹³ www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf

¹⁴www.stategrowth.tas.gov.au/ data/assets/pdf_file/0008/435572/Club_Funding_and_Development_Agreeme_nt_- Signed_3_May_2023.PDF (pp.7-8)

Exaggerated Tasmanian team element

Many of the "pro" stadium arguments have been emphasising that Tasmanians will be able to play at home for their own state team. While this is certainly possible and would be great, the AFL draft does not guarantee Tasmanians will play for Tasmania. It is a national draft, with the previous year's ladder determining which teams get to pick players first.

Rejected by independent certifier Nick Gruen and Tasmanian Planning Commission

Given the two major reviewers recognised significant issues, it seems reckless to continue with the stadium as is.

In the words of Dr Gruen: "The central conclusion of this review is that the projected costs associated with the stadium at the Macquarie Point multipurpose precinct have been significantly understated. At the same time, the benefits have been overstated. Accordingly, the projected benefit-cost ratio has been significantly overstated. I find that the costs of the stadium development can reasonably be estimated to exceed \$1 billion, with a benefit-cost ratio of 44 cents in every dollar invested by Tasmania. It also seems likely that the wrong site has been selected"¹⁵.

Comments from the Planning Commission are included throughout this submission.

Bypassing Project of State Significance process

Naturally, the largest infrastructure project should be subject to scrutiny and assessed against the measures deemed to result in the best outcome. The fact this process is being abandoned is extremely disappointing and risky!!

Why even have a Planning Commission or POSS process if they are to be so blatantly disregarded?

Inaccurate Business Case

The Business Case no longer stands up. The fact that cricket was mentioned and is now likely not possible, the inaccurate costings (not to mention the supporting infrastructure being excluded), the inflated benefits - and the list goes on - make the Business Case inaccurate. It should be resubmitted with updated information.

Negative Benefit to Cost Ratio

"The KPMG Cost-Benefit Analysis (CBA) found the stadium would have a negative net benefit and modelled a benefit-cost ratio of 0.69. The supplementary social and cultural analysis describes a range of qualitative benefits that are partially or not quantified in the CBA. Alternative analyses, including a proposal of the Panel, have focussed on this number

¹⁵ https://live-production.wcms.abc-cdn.net.au/fb51a2fbb43c25fd865faf3e275b6882 (p.1)

and proposed lower benefit cost ratios, with the Panel's preferred number being 0.53"16. As stated, independent reviewer Dr Gruen rated it as low as 0.4417.

Maybe 50 cents back for every dollar spent? No thanks!

Perhaps the most startling part of the Draft Integrated Assessment Report is the table of huge discrepancies between the proponent's claims and the calculations from Dr Gruen and the Planning Commission¹⁸. These vastly disparate numbers are not comforting.

Table 1.1.1 Cost-Benefit Outcomes - Central Case

| NET PRESENT VALUE 2024 TO 2058 \$millions | PROPONENT | GRUEN | PANEL |
|--|-----------|--------|--------|
| COSTS | | | |
| Capital costs (core stadium) | 578.9 | 624.7 | 653.4 |
| Capital costs (stadium related) | 0 | 57.6 | 120.6 |
| Capital costs (precinct and preliminary) | 0 | 123.4 | 185.7 |
| Opportunity cost of land | 0 | 155.6 | 32.6 |
| Lifecycle costs | 0 | 73.1 | 73.1 |
| Operating costs | 62.4 | 135.9 | 135.9 |
| Event attraction costs | 14 | 70.8 | 70.8 |
| Government subsidy to Devils AFL/W teams | 98.6 | 91.1 | 98.6 |
| Marginal cost of public funds | 0 | 86.7 | 43.4 |
| Credit rating downgrade | 0 | 0 | 0 |
| Visual disamenity/externality | 0 | 9.1 | 0 |
| TOTAL COSTS | 753.9 | 1428.0 | 1414.1 |
| BENEFITS | | | |
| Increased visitation sports and cultural | 198.3 | 25.2 | 56.3 |
| (less offset loss of Bellerive games) | 0 | -10.5 | -10.5 |
| Increased visitation - business events | 13.2 | 4.4 | 3.7 |
| Increased visitation - operators | 1.4 | 0.7 | 0.4 |
| Increased visitation - cruise ships | 0 | 2.1 | 2.1 |
| Retained visitation | 106.8 | 25.7 | 52.6 |
| (less offset to retained visitation from less travel | 0 | -2.7 | -2.7 |
| TasPorts add. net revenue from cruise ships | 0 | 1.0 | 1.0 |
| Use value | 17.1 | 21.8 | 17.1 |
| AFL industry | 88 | 24.6 | 49.1 |
| Terminal value | 41.9 | 97.1 | 105.3 |
| Land value at end of 2030 | 0 | 41 | 8.6 |
| Non-use value | 20.3 | 19.7 | 20.3 |
| Health and productivity | 29.9 | 16.2 | 29.9 |

¹⁶ www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.47)

¹⁷ https://live-production.wcms.abc-cdn.net.au/fb51a2fbb43c25fd865faf3e275b6882 (p.1)

www.planning.tas.gov.au/__data/assets/pdf_file/0008/803825/Macquarie-Point-Multipurpose-Stadium-Draft-Integrated-Assessment-Report-3 I-March-2025.PDF (pp.19-20)

| NET PRESENT VALUE 2024 TO 2058 \$millions | PROPONENT | GRUEN | PANEL |
|--|-----------|-------|-------|
| TOTAL BENEFITS IN PROPONENT'S REPORT | 516.86 | | |
| Stadium revenue tickets | | 12.5 | 12.5 |
| Stadium revenue venue hire | | 16.3 | 16.3 |
| Stadium revenue food and beverages | | 84.3 | 84.3 |
| Stadium revenue LED Ribbon Board Advertising | | 6.4 | 6.4 |
| Stadium revenue functions | | 5.7 | 5.7 |
| Stadium revenue membership and other | | 46.8 | 46.8 |
| Car Park revenue | | 0 | 30.2 |
| AFL contribution to stadium | | 11.5 | 13.1 |
| Commonwealth contribution to stadium | | 183.6 | 196.5 |
| TOTAL BENEFITS (1) | 516.86 | 633.4 | 744.9 |
| Benefit cost ratio | 0.69 | 0.44 | 0.53 |

Note to table 1.1.1:

Overstated benefits

In the Planning Commission's report, the above Cost-Benefit Outcomes table clearly displays huge disparities between the proponent versus Dr Gruen's and the Panel's calculations, most notably in relation to increased visitation for sports and cultural events.

While we love going to concerts, our general observation is that most major artists only visit Melbourne, Sydney and Brisbane (and sometimes Perth) on their tours - even though other states have stadiums. We think it is unlikely Hobart would be added to the itinerary because of this new stadium.

We also feel that mainlanders would attend the relevant equivalent event in their own state, rather than flying down especially to Hobart.

Research not in favour of stadium economic benefits

Multiple studies have found that stadiums do not have significant impacts on the local economy and tend to redirect activity rather than create it.

"There now exists almost twenty years of research on the economic impact of professional sports franchises and facilities on the local economy. The results in this literature are strikingly consistent. No matter what cities or geographical areas are examined, no matter what estimators are used, no matter what model specifications are used, and no matter what variables are used, articles published in peer reviewed economics journals contain

In its CBA, the Proponent presents operating costs and revenues as a net subsidy whereas they
are explicitly identified in Dr Gruen's Report and by the Panel. Differences in the Net Present
Values (NPV) for Commonwealth and AFL contributions reflect timing differences.

almost no evidence that professional sports franchises and facilities have a measurable economic impact on the economy" ¹⁹.

"Nearly all empirical studies find little to no tangible impacts of sports teams and facilities on local economic activity, and the level of venue subsidies typically provided far exceeds any observed economic benefits"²⁰.

"Research conducted over decades indicates public investments in sports stadiums almost never lead to massive economic gains for host cities"²¹.

Not suitable for cricket

In a joint submission prepared by Cricket Australia and Cricket Tasmania, it is noted that "the fixed roof design that has been presented by the MPDC presents significant challenges for our sport. The proposed roof structure casts a grid-like pattern of shadows that moves across the field of play, particularly on the cricket pitch block, throughout the day, presenting an unacceptable playing, operational and broadcast environment for all forms of cricket, including Test Matches, One Day International (50 over) and T20 fixtures that commence in daylight hours (which is all matches during December and January, particularly twilight matches with an afternoon start time, noting daylight savings adjusted time). While MPDC and its team have explored mitigation options for the shadows, we are of the view that they are either unworkable, in that they do not eliminate the shadows, or they are temporary in nature introducing other significant potential problems relating to playing conditions, venue operations and broadcast quality. The extent to which cricket can be played in the stadium and how many matches may be played each year forms part of the Cost-Benefit Analysis considered in the Draft Report. Until such time as stadium design discussions progress to a point where our current concerns can be overcome, Cricket Australia and Cricket Tasmania are unable to confirm that the content assumptions contemplated by that analysis are reliable nor that they can be achieved"22.

Given the new stadium was touted as a site for cricket, surely it should not proceed in its current format?

Funding model

While the original funding model was not ideal, the abandonment of private funding means that Tasmania will pay ... and pay and pay.

The alleged Tasmanian Government cap of \$375 million and "not a red cent more" has been blown apart, noting only \$85 million in borrowings was stated in the Business Case²⁴.

¹⁹www.academia.edu/7854794/Do_econonomists_reach_a_conclusion_on_subsides_for_sports_franchises_st_adiums_and_mega_events_coates_and_humpheys#loswp-work-container (p.9)

https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4022547

²¹ www.themandarin.com.au/243929-public-funding-for-sports-stadiums-research-roundup/

www.planning.tas.gov.au/__data/assets/pdf_file/0009/808587/328-Alison-Turner-Cricket-Australia-and-Cricket-Tasmania-doc-I-Submitted-08-May-2025.pdf (pp. I-2)

²³ www.abc.net.au/news/2025-05-08/rockliff-red-cent-macquarie-point-stadium-funding-explainer/105267870

²⁴ https://live-production.wcms.abc-cdn.net.au/738382a7ae9cad78ec1b754b027d9e87 (p.65)

It seems that the Federal Government will pay \$240 million and the AFL is chipping in a measly \$15 million. Everything else falls on the Tasmanian Government.

Latest cost estimates for the stadium are at \$945 million but it is not hard to see that that this project will end up costing more than this. "As with any large infrastructure project the Macquarie Point Multipurpose Stadium and the wider Macquarie Point Urban Renewal Project are subject to the same ongoing procurement, supply and cost risks that other major projects have experienced, and therefore need to be carefully managed" The Macquarie Point Multipurpose Stadium Enabling Legislation Draft Report also acknowledges that "construction costs will also increase with the further passage of time" should the project be delayed.

Supporting infrastructure not included

"Infrastructure such as the Northern Access Road and event bus plaza will require a separate permit to be issued at a later date" This feels like putting the cart before the horse. These also require additional separate funding (and probably a lot of it).

This is not forgetting the cost of relocating the Macquarie Point Wastewater Treatment Plant, understood to be \$314 million (of which the Tasmanian Government contributed \$224 million)²⁸.

Cost of compensating previous developers

According to Hansard, the Tasmanian Government had to compensate "\$1.25 million to Milieu developers" and there may be further compensation for other previously existing contracts for Macquarie Point.

Cost overrun for Kingston high performance centre

Given Rosny was deemed unsuitable for the high performance centre due to "geotechnical investigations reveal[ing] extensive works would need to be completed to allow the construction of the facility" (it seems that little due diligence was conducted in advance at that site too), the centre was moved to Kingston.

The Kingston high performance centre, which was thought to be less of a cost risk than Rosny despite "hundreds of thousands of dollars' worth of [Clarence City Council] money and resources to help the Government facilitate this process", has already experienced a large cost blowout. What was originally meant to cost \$70 million (\$60 million from the Tasmanian Government with the AFL chipping in the rest) is now expected to cost

²⁵ www.treasury.tas.gov.au/Documents/2025-26%20The%20Budget%20-%20Budget%20Paper%20No.1.PDF (p.83)

www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.15)

www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.20)

https://utilitymagazine.com.au/taswater-preps-for-314m-selfs-point-upgrade/

²⁹ www.parliament.tas.gov.au/house-of-assembly/chamber-proceedings/proceedings/2025/may/house-of-assembly-7-may (p.22)

³⁰ www.abc.net.au/news/2024-11-19/high-performance-centre-tas-afl-kingston-/104613234

\$115 million (\$105 million from the Tasmanian Government with the AFL contributing its original \$10 million)³¹. Who knows how much it'll cost the state by the end of the process?

It should only make anyone wonder what the final cost of the actual stadium will be.

Budget issues

The Tasmanian Government is experiencing record net debt, which is only set to grow.

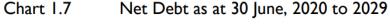
Net Debt

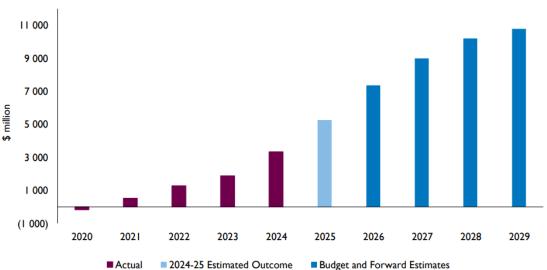
Net Debt represents Borrowings plus Lease liabilities and Service concession liabilities less the sum of Cash and deposits and Investments. A reference to 'negative' Net Debt means that Cash and deposits and Investments exceed the combined value of Borrowings, Lease liabilities and Service concession liabilities.

It is estimated that General Government Net Debt will be \$7 361.2 million as at 30 June 2026, increasing to \$10 783.1 million as at 30 June 2029.

Chart I.7 provides the change in Net Debt since 30 June 2020 and the current projections for the 2025-26 Budget and Forward Estimates.

Further information on Net Debt can be found in chapter 8 of this Budget Paper.





Net debt is forecast to increase to almost \$11 billion by 2029³². Independent economist Saul Eslake suggests the position could be even worse and that Tasmania is in the worst position of the states and territories^{33,34}. He has also recommended that the state needs to reduce infrastructure spending³⁵.

³¹ www.abc.net.au/news/2025-05-19/tasmania-devils-afl-high-performance-centre-delays-cost-blowout/105306576

 $[\]frac{32}{\text{www.treasury.tas.gov.au/Documents/2025-26\%20The\%20Budget\%20-\%20Budget\%20Paper\%20No.1.PDF} \\ \text{(p.19)}$

³³ www.abc.net.au/listen/programs/hobart-mornings/saul-eslake/105357084

³⁴ www.abc.net.au/listen/programs/hobart-drive/saul-eslake-on-the-economics/105382760

³⁵ www.abc.net.au/listen/programs/hobart-mornings/saul-eslakes-recovery-plan/105399212

While we acknowledge the stadium is not the only contributor to the debt position, the Macquarie Point Urban Renewal Project was listed as a **specific expenditure risk** in the 2025-26 Budget Papers³⁶, noting that the Budget did not pass due to Parliament being dissolved.

Treasurer Guy Barnett stated in his Budget Speech, "We are ensuring we spend every single dollar of taxpayers' money wisely" Is that really the case?

Like most Tasmanians, we do not think a new stadium is wise or the right priority - surely this money would be better used for healthcare, education, housing or other public services, or to pay down existing debt.

Risk of credit rating downgrade

Tasmania is at risk of being downgraded by the credit rating agencies. The stadium "may trigger a credit downgrade, thereby affecting the cost of all other state debt" ...

Macquarie Point has other uses

Macquarie Point has been designated for other things at various points. One previous Macquarie Point Masterplan included 1,000 new homes³⁹.

The Federal Government committed \$240 million under an Infrastructure Federal Funding Agreement in 2024, which stipulated that Tasmania would "ensure the delivery of housing at Macquarie Point, including a portion set aside as affordable, essential worker or social housing"⁴⁰. The Macquarie Point Urban Development was to include "a focus on transport connections, while prioritising Hobart port upgrades and housing for Tasmanians"⁴¹.

There does not seem to be enough room for the "urban renewal" previously planned. Surely the tiny pink zone⁴² will struggle to fit any affordable, essential worker or social housing and is an odd position for it? This appears to be on reclaimed land also.

 $[\]frac{36}{\text{www.treasury.} tas.gov.au/Documents/2025-26\%20 The\%20 Budget\%20-\%20 Budget\%20 Paper\%20 No.1.PDF}{\text{(p.82)}}$

www.treasury.tas.gov.au/Documents/2025-26%20Budget%20Speech.PDF (p.15)

 $^{^{38}}$ www.abc.net.au/news/2025-04-01/macquarie-point-stadium-scrutinised-tasmania-planning-commission/105119430

³⁹ https://bencemulcahy.com.au/macquarie-point-masterplan/

⁴⁰ https://federalfinancialrelations.gov.au/sites/federalfinancialrelations.gov.au/files/2024-

^{05/}Macquarie%20Point%20Urban%20Redevelopment.pdf (pp.2-3)

⁴¹ www.pm.gov.au/media/macquarie-point-be-revitalised-government-co-investments

⁴² www.tas.gov.au/dpac/macquarie-point-multipurpose-stadium-consultation/documents/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.9)



Figure 1: The Mac Point Precinct Plan (Source: MPDC)

The Federal Funding Agreement required Tasmania to "engage with the community and all affected stakeholders, including but not limited to Tasmanian Aboriginal groups, veteran groups and Hobart City Council, to understand the breadth of strategic opportunities of the precinct and consider the findings to inform the precinct plan". It seems these groups are very disappointed with the proposal, as described separately below.

Macquarie Point is also the site of many Dark Mofo events, which is a major Hobart attraction.

Hobart City Council concerns

In a submission, the Council said:

"We are deeply disappointed and concerned that the Government has indicated that it intends to stop the PoSS process before it completes its work.

At its 28 April 2025 meeting, Council concluded that it does not support this project being built at this location, as the negative impacts outweigh the positive benefits.

In summary, Council has consistently maintained that the stadium will result in:

- significant damage to places of heritage significance (including the Hunter Street precinct and Cenotaph) and Hobart's heritage tourism brand;
- the lost opportunity, of what will be an inactive precinct for most of the year, in a prime and strategic location for the City;
- significant environmental concerns, as raised by the EPA in their submission to the TPC;
- the impact of the northern road in cutting off community access to the river;

- the very poor process that led to this point including the AFL overriding the approved plan for Macquarie Point and the abandonment of the POSS process; and
- the lack of critical transport infrastructure to support a functional stadium"⁴³.

Cenotaph being disrespected

RSL Tasmania has said it has been "disrespected and misled at every turn" over the stadium's size and impact on sight lines from the Hobart cenotaph has historic, cultural and spiritual significance to the Tasmanian community, especially to returned and current service personnel and their families and is considered a sacred place.

The proposed Macquarie Point stadium is simply very disrespectful to veterans.

Aboriginal significance

Macquarie Point is a notable site for Aboriginal people. Part of the site had initially been slated to become a Truth and Reconciliation Park with a cultural centre, as Tasmania is the only state or territory that doesn't have an Aboriginal cultural centre or physical recognition of its violent past of dispossession⁴⁵. This is another example of an unrealised commitment made to Aboriginal people. Even if an "Aboriginal Culturally Informed Zone"⁴⁶ is added, which is now much smaller than previously indicated, surely a big stadium dominating most of the site is disrespectful? Our First Nations people have suffered enough.

A search of the Aboriginal Heritage Register indicated that there may be a risk of impacting Aboriginal relics⁴⁷.



Your search of MACQUARIE POINT 10 EVANS ST HOBART TAS 7000 (PID 9126826) at 4:48 PM on 9 June 2025 indicated that there may be a risk of impacting registered Aboriginal relics.

Roof unnecessary

There is only one stadium in Australia with a roof: Marvel Stadium in Docklands, Victoria. This stadium has a retractable roof which makes it suitable for all sorts of events (ie cricket, where it is not affected by shading issues). It is twice as big as the one planned for Tasmania,

⁴³ www.hobartcity.com.au/files/assets/public/v/2/projects/city-shaping-projects/macquarie-point-stadium-draft-integrated-assessment-report-submission/macquarie-point-stadium-draft-integrated-assessment-report-submission-7-may-2025.pdf (p.1)

⁴⁴ www.abc.net.au/news/2024-07-20/tas-rsl-slams-stadium-plan-over-impact-on-cenotaph-sightlines/104117632

⁴⁵ www.abc.net.au/news/2024-10-02/tas-macquarie-point-hobart-stadium-aboriginal-park-reduction/104407184

⁴⁶ www.tas.gov.au/ data/assets/pdf_file/0033/439539/Mac-Point-Precinct-Plan.pdf (pp. 19-20)

⁴⁷ www.aboriginalheritage.tas.gov.au/propertysearch/

accommodating up to over 54,000 people for football and up to over 77,000 people for a concert⁴⁸. Marvel Stadium is also owned by the AFL⁴⁹.

All other well-functioning Australian stadiums do not have rooves, including the MCG, arguably Australia's premier football ground.

It should also be mentioned that Hobart is the second driest capital city in Australia after Adelaide⁵⁰, making anyone question why a roof would be required.

Only half designed

The CEO of Macquarie Point Development Corporation has said, "We're at **50** per cent detailed design" How can an accurate business case, project plan, timeline and cost be established with so many variables?

The Premier stated, "This will be a well thought through stadia infrastructure" on 3 April 2025⁵². We imagine much more work is required (a complete redesign and new site) for this to be the case.

Does not fit on site

Recognised architect Mat Hinds has spoken about the ideal layout for a stadium⁵³ and noted the need for an "apron", meaning a large open site, which should preferably be next to enormous existing roadways and infrastructure to facilitate movement. Mat said, "What we have at Macquarie Point is a hemmed-in site on every side that is far too small to support the apron that's required for a building of that size". He also mentioned that the current drawings do not show all the energy of that building and its serving requirements to make it work properly. From an architect's perspective, there is a chance the project can't actually be realised as it simply does not fit. "Why choose a site with so many latent risks?"

Visual impact

The proposed stadium is 10 metres higher than the apex of the Tasman bridge⁵⁴ - gigantic!

It is no secret that the new stadium will have a big impact on iconic Tasmanian views, especially behind heritage buildings.

⁴⁸ www.marvelstadium.com.au/history/

⁴⁹ www.austadiums.com/news/813/management-of-marvel-stadium-integrated-into-afl-as-part-of-restructure

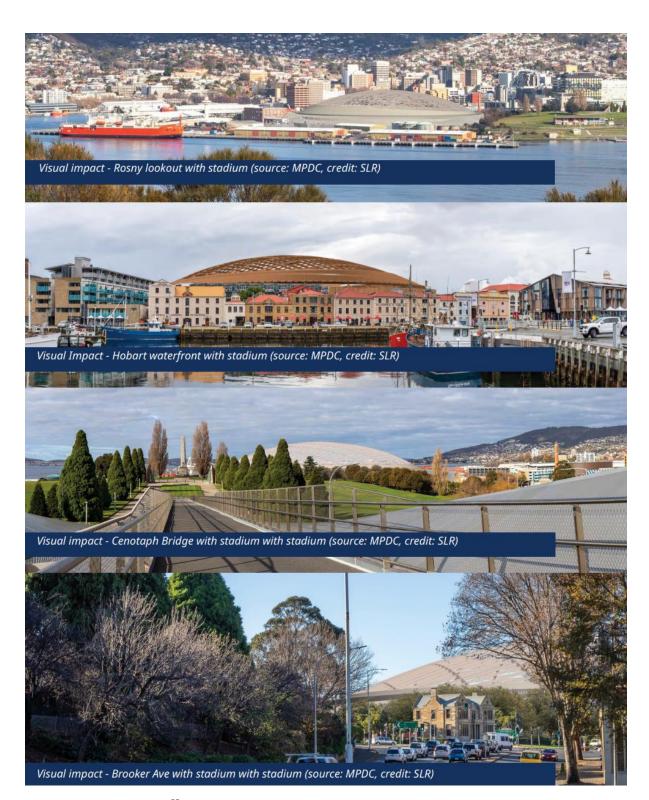
⁵⁰ https://hobartandbeyond.com.au/visitor-information/weather-in-tasmania/

⁵¹ www.abc.net.au/news/2025-05-28/hobart-macquarie-point-stadium-legislation-explained/105343576

⁵² www.parliament.tas.gov.au/house-of-assembly/chamber-proceedings/proceedings/2025/april/house-of-assembly-3-april (p.7)

⁵³ www.abc.net.au/listen/programs/hobart-drive/change-my-mind-stadium-debate/105320464

⁵⁴ www.abc.net.au/listen/programs/hobart-drive/change-my-mind-stadium-debate/105320464



Some mock-up images⁵⁵ show the substantial impact. The stadium dwarfs many Hobart landmarks that are part of our brand, including the Hobart docks and Fine Arts school and the cenotaph. Imagine getting a postcard from Tassie with that on it?!

⁵⁵ www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.71) The Planning Commission considers that the stadium "does not respect the natural layered landform of Hobart", including how it sits in relation to Kunanyi/Mt Wellington and the River Derwent. It is considered contrary to Hobart's visual values and natural topography⁵⁶.

"The Draft Integrated Assessment Report suggested there is significant potential for negative impact on the existing sense of community for residents in the surrounding area, due to changes to the area and increased foot and vehicle traffic, and due to the significant visual change in the landscape" ⁵⁷.

Site issues and contamination

The Macquarie Point Wastewater Treatment Plant "regularly breached environmental standards for discharging chemicals into the River Derwent, creating a high risk of toxicity" ⁵⁸.

Additionally, the Planning Commission noted that "Legacy contamination is a feature of the broader Macquarie Point development site due to a sustained history of industrial use including rail, gasworks and bulk fuel storage and handling, as well as the reclamation of large areas from the estuary using uncontrolled fill. Consequently, areas of contamination are a feature of the development site" 59.

It is recognised that the site contamination "could take years upon years to ameliorate" 60.

Safety issues

It seems that people may not be able to leave the stadium safely or easily and certainly not quickly. The Planning Commission has said that the area has limited existing options for the efficient dispersal of pedestrian traffic and that various pinch points will develop. "This could create safety issues if an emergency evacuation is required" [1].

 $[\]frac{56}{www.abc.net.au/news/2025-04-01/macquarie-point-stadium-scrutinised-tasmania-planning-commission/105119430}$

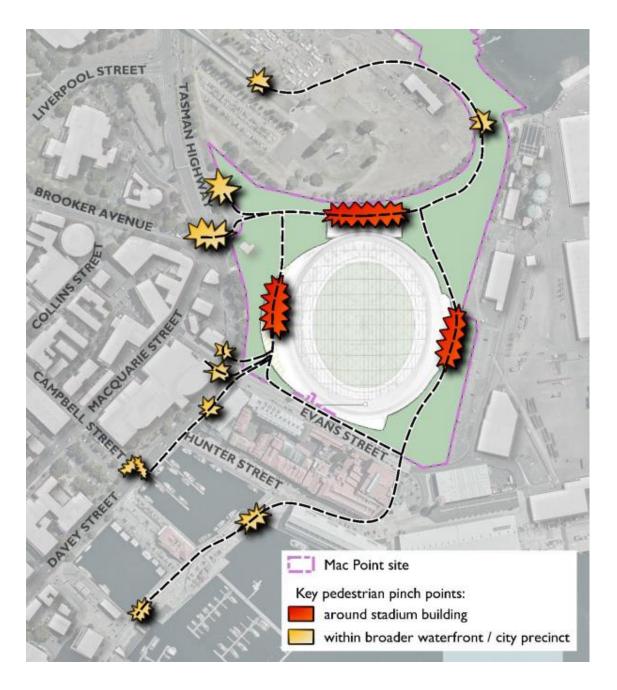
⁵⁷ www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.57)

⁵⁸ www.abc.net.au/news/2023-01-18/tas-macquarie-point-sewerage-toxic-discharge-move-costs/101857696

⁵⁹ https://www.planning.tas.gov.au/__data/assets/pdf_file/0008/803825/Macquarie-Point-Multipurpose-Stadium-Draft-Integrated-Assessment-Report-31-March-2025.PDF (p.103)

⁶⁰ www.abc.net.au/listen/programs/hobart-drive/change-my-mind-stadium-debate/105320464

 $[\]frac{61}{www.abc.net.au/news/2025-04-01/macquarie-point-stadium-scrutinised-tasmania-planning-commission/105119430}{commission/105119430}$



Ineffective public transport options

Hobart residents struggle to get to work on time in the city due to congestion issues - imagine if the stated 23,000 people are trying to get the football and miss the first quarter due to the traffic!

The Government has a target of 24.5 per cent of people using buses to reach the stadium, but the Planning Commission has said that there are not enough bus stops to handle it. "Those catching the buses could expect to wait more than an hour after the match. There would need to be 80 more buses in the fleet as well, along with substantial additional

funding and long-term operating contracts - for a service that has recently been significantly cut back due to problems with recruiting enough drivers" 62.

Hobart's public transport is not effective at the best of times and given there is no rail or other bus alternative, it seems this is not practical.

According to the ABC, "No agreement has been entered into yet with the Department of State Growth on how event traffic will be managed". The Planning Commission has flagged that even with significant traffic management - including police, Tasman Bridge alterations and traffic light signal changes - **congestion** "could not be managed".

Very unpopular

Perhaps most notably, the stadium is not popular among Tasmanians.

The Macquarie Point Multipurpose Stadium Enabling Legislation Draft Report notes that "Most submissions [on the Draft Integrated Assessment Report] were made by individual Tasmanians, with *a substantial majority expressing opposition*"⁶⁴.

EMRS polling conducted in February 2025 revealed that 59% of Tasmanians did not support the proposed new stadium at Macquarie Point, with a breakdown of 67% disapproval in the North, 65% in the North West and 52% in the South⁶⁵.

More recent EMRS polling from June 2025 showed that **the stadium legislation is universally unpopular**. "Across the state, percentage support levels for the Stadium enabling legislation were Bass 29-58, Braddon 31-57, Lyons 24-62, Franklin 38-48, and Clark 28-61"66.

Why proceed with a project that the majority of Tasmanians don't want?

Draft Bill open to risk

To specifically address the Macquarie Point Planning Permit Bill 2025, we make the following comments, noting the bill was tabled in Parliament by Minister Eric Abetz on 3 June 2025⁶⁷. We question why it even sits under that portfolio - surely Infrastructure, Planning or Sports and Events would be more logical?

It is concerning to see that the Minister has seemingly unfettered power to instruct the Planning Commission to change a planning scheme.

 $[\]frac{62}{www.abc.net.au/news/2025-04-01/macquarie-point-stadium-scrutinised-tasmania-planning-commission/105119430}{commission/105119430}$

 $^{^{63}}$ www.abc.net.au/news/2025-04-01/macquarie-point-stadium-scrutinised-tasmania-planning-commission/105119430

⁶⁴ www.tas.gov.au/__data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.37)

⁶⁵ www.emrs.com.au/sites/default/files/documents/EMRS%20-

^{%20}Stadium%20and%20Third%20Party%20Appeals%20Report%20-%20February%202025.pdf (p.6)

⁶⁶www.emrs.com.au/sites/default/files/documents/2025%20EMRS%20Budget%20Survey%205%20June%202025.p.df

⁶⁷ www.parliament.tas.gov.au/bills/bills2025/macquarie-point-planning-permit-bill-31-of-2025

"The Bill provides the Minister with the power to direct the Commission to amend any relevant planning scheme or order required to remove any inconsistency with the permit (or subsequent permits)" 68.

It also worrying that **all rights of appeal are extinguished** relating to land ownership⁶⁹ and that no order or review may be made under the *Judicial Review Act* 2000⁷⁰. This seems to be going too far!!

It is disheartening to see the POSS Order being formally repealed⁷¹.

We hope the Bill is reconsidered.

Alternative options

Even the biggest AFL fan could surely not agree that the current contract is a good or fair one.

If the Tasmanian Government decides to proceed with the team, it would be wise to renegotiate the deal.

We would be open to a new greenfield site to generate development if a new stadium truly is required, however every effort should be made to utilise existing resources first.

As stated by Dr Gruen, "Tasmanians, and all who wish to see a Tasmanian AFL team succeed, need to take the time to get the stadium right".

Conclusion

This whole process is riddled with issues and concerns, including but not limited to cost overruns, design issues, site inadequacies, overstated benefits and little consideration of consultation.

It would be prudent (and respectful to the Tasmanian community) to come back with an updated Business Case, complete the POSS process and undertake further due diligence as needed before rushing a bill through Parliament. We see this situation as bowing to the AFL's unreasonable demands without fully recognising the impacts.

We are extremely disappointed to see the two major parties (especially Labor, which previously opposed the new stadium) unequivocally supporting a new stadium at Macquarie Point and hope that the aforementioned reasons and the views of most Tasmanians will be taken in account.

Tasmania should have an AFL team just like the other states but **not** under these conditions. There are far more issues in Tasmania than just football.

⁶⁸ www.tas.gov.au/ __data/assets/pdf_file/0020/440057/Macquarie-Point-Multipurpose-Stadium-Enabling-Legislation-Draft-Report.pdf (p.21)

⁶⁹ www.parliament.tas.gov.au/ data/assets/pdf_file/0019/94015/31-of-2025.pdf (p.35)

⁷⁰ www.parliament.tas.gov.au/ data/assets/pdf_file/0019/94015/31-of-2025.pdf (p.54)

⁷¹ www.parliament.tas.gov.au/ data/assets/pdf_file/0019/94015/31-of-2025.pdf (p.98)

⁷² https://live-production.wcms.abc-cdn.net.au/fb51a2fbb43c25fd865faf3e275b6882 (p.4)

| Thank you for considering this submission. |
|--|
| Sincerely, |
| Aaron and Steph |
| Kingston |
| |
| PS: Season I Episode 6 of political satire series Utopia explored the new stadium concept in 2014^{73} - this alone should make anyone wonder how we got to this point!! |
| |
| |
| |

73 www.youtube.com/watch?v=3XUn-EsThcE&t=5s