THE MATTER OF THE MACQUARIE POINT MULTIPURPOSE STADIUM INTEGRATED ASSESSMENT UNDER THE *STATE POLICIES AND PROJECTS ACT 1993*

REPRESENTATION 3 ON BEHALF OF PROPONENT

Introduction

1.1 This Representation is made on behalf of the Crown in Right of Tasmania, by Macquarie Point Development Corporation (**Proponent**).

1.2 As outlined in **Representation 1** and **Representation 2, Representation 3** provides the Proponent's response to issues considered and conclusions reached in the Draft Integrated Assessment Report (**IAR**).

Summary of Proponent's position

2.1 The Proponent continues to rely on the range of material submitted to the Commission on 17 September 2024 (**POSS Submission**), and in response to the Commission's Requests for Information thereafter. The Proponent believes this to be a comprehensive submission, appropriate for this stage of the Project. This information, along with the further information that has been provided, totals almost 5,000 pages of specialist reports and advice, and provides detailed information, by relevant experts, covering the issues raised in the Draft IAR and additional considerations. The submissions evidence the work undertaken to date in:

(a) identifying the desirable key characteristics of the Project, reflecting its significant potential as a transformative project for Hobart and Tasmania;

(b) the careful and considered assessment of all environmental, social, community and economic issues of potential relevance to the integrated assessment of the Project under the *State Policies and Projects Act 1999* (Tas) (**SPP Act**); and

(c) the Project can be delivered safely, effectively and as a new landmark development as part of, and adding to, the city, region and state.

2.2 The central themes of the Proponent's case are as follows:[1]

(a) The Commission's task is to advise Government about the Project within the objects of the SPP Act and the Objectives of the Resource Management and Planning System of Tasmania, and having regard to specific objects for the land legislated under the *Macquarie Point Development Corporation Act 2012* (Tas). The declaration of the Project as a Project of State Significance provides an explicit expectation that the assessment is not bound by existing policy or planning scheme control.

(b) The subject land forms part of a strategic precinct with specific development objectives that will necessarily bring about substantial development and character change at a precinct level.

(c) The vision for development of a stadium of high quality and civic pride promotes ongoing public use, visitation, and a sense of public ownership of the site for future generations.

[1] These themes are derived from those set out in Representation 1.

(d) The development and use of the land is responsive to a number of national, State and local policy initiatives variously expressed for the state and local economies including, but not limited to, broader policies relevant to economic development, tourism, health and liveability.

(e) The architectural response is informed by the local character and uses of the site and surrounds, and is appropriate for an outcome that is visionary and bold, yet designed and clad to be informed by the site's history, its surrounds and the Tasmanian brand. As a bold and significant project, it should be assessed accordingly, with the opportunity to be viewed in this context over the longer term.

(f) The function and location of the Project is unsurpassed as a gateway to the city and brings new offerings and capabilities to the city and state, while also providing synergies with the Hobart CBD and surrounding attractions.

(g) The urban and civic design of the precinct and surrounds complements and builds upon principles for the development of the land evolved over time, through the remediation process, and in response to working with the community.

(h) The use of the subject land for the Project will bring with it a wide range of significant direct and indirect social and economic benefits, some of which can be predicted and quantified, and others which can reasonably be predicted on a qualitative or descriptive basis.

(i) The location of the Project is optimal for broader and local transport modes and to take advantage of planned and future infrastructure upgrades over time.

(j) The location of the site is ideal to support and host the use of the Project as planned and managed to support a variety of user groups, including to:

    (i) host AFL and AFLW games at various levels including for Tasmanian AFL and AFLW teams, bringing immediate and predictable attention, occupation and visitation;

    (ii) host a variety of cricket matches;

    (iii) host a variety of other sports uses;

    (iv) support visitation and broadcasting, with benefits for various codes;

    (v) support an extensive range of scheduled business and community events including cultural, musical and corporate events; and

    (vi) support aligned activities, including in health, education and hospitality.

(k) The Project can be planned and managed to:

    (i) avoid unacceptable impacts during construction, including noise, dust and traffic impacts via an appropriate Construction Management Plan;

    (ii) provide for acceptable operating impacts during peak usage via appropriate event management planning, scheduling and integration with relevant agencies; and

    (iii) ensure impacts are appropriately managed through conditions.

2.3 The Project is sufficiently planned and considered to support findings that it is capable of town planning approval, which is intended to support final design, other infrastructure and precinct planning, in accordance with the Objectives of the Resource Management and Planning System of Tasmania and the Mac Point Precinct Plan.

Responses to topics raised in Draft IAR

3.1 This section provides the Proponent's responses in respect of the topics raised in the Draft IAR, in summary terms. **Attachment 1** to this representation tabulates the Proponent's specific responses to matters raised, and also notes matters not addressed, in the Draft IAR.

3.2 This Representation addresses the following key topics, with the Proponent's key position as follows:

(a) Urban form and planning – the Project is a well-conceived response to urban form and planning matters, delivering an iconic building and place of great social and community benefit justifying a change to the existing environment;

(b) Economic effects – the Project will provide economic benefits through construction, and once open for events, attract local and visitor expenditure and investments across the State;

(c) Social and community effects – as a place for community and congregation, the social and community benefits of the Project are substantial. The Project is conceived and designed to become a place of civic pride and cohesion;

(d) Transport and movement – the Project takes advantage of its central location, maximising existing patterns of movement and catalysing investment in future networks and planning;

(e) Historic heritage – the Project has been carefully designed to suit its context near heritage places, and to provide heritage benefits and offsets through enabling new understandings and experiences of those places;

(f) Aboriginal cultural heritage – ongoing consultation will enhance existing commitments made to deliver the Aboriginal Culturally Informed Zone and will continue to inform the Proponent's intention to involve Aboriginal people in the Project;

(g) Noise and vibration – the Project Site sits within the existing city noisescape and construction and operational noise impacts can be managed to ensure any potential impacts are acceptable; and

(h) Lighting – the roofed stadium controls light spill, avoiding any undesirable impacts.

3.3 Other topics are addressed in **Attachment 1**.

<u>Urban form and planning</u>

3.4 The POSS Submission supports a land use and built form on this site that is transformative, iconic and prominent. The Project represents a well-conceived, positive contribution to the future urban form and land use setting of Hobart, in a manner which is appropriate for the site's potential and the purposes of the MPDC Act directing its renewal.

3.5 In respect of the issues which were addressed in the Draft IAR, the following is noted:

(a) The stadium has been designed to be an integrated part of the site. It is not a large stadium in comparative terms, or in terms of wall height or general height. Its design is sculpted such that the roof form is dome-like and its high point is central to the site, away from the street edge. This results in an overall form that minimises height, assisting in establishing a street interface that is comparable to the scale of existing buildings.

(b) Change is not equivalent to unacceptable impact.

(c) The site presents an opportunity for a stadium to be centrally located to a broad catchment, and which can link to and benefit to other businesses and attractions, as well as ongoing and future infrastructure improvements directed at movement in and around the city.

(d) The use of the land for a stadium optimises the preservation of a central public land asset for ongoing public access and enjoyment for generations to come.

(e) Having regard to legislation relevant to the site, the strategic significance of the site, and the declared significance of the Project, the assessment of the Project from a land use and urban form perspective should have regard to, but not be based on, historical planning principles such as those of the *Sullivans Cove Planning Review 1991*.

3.6 Specific work prepared and supporting the POSS Submission, including particularly the Site Development Plan (**SDP**) which provides key principles based on a consideration of all historical planning for the broader area,[2] is not addressed in the Draft IAR.

3.7 As well as the SDP, the POSS Submission included a planning and urban design assessment,[3] an Urban Design Framework[4] and detailed visual impact assessment reports and photomontages.[5] This work demonstrates the consistency of the Project with the most important principles relevant to its urban form and land use planning context.

Use and activity

3.8 The Project represents substantial positive change in land use planning terms: the conversion of an underutilised, brownfield site, to land use focused on social and community outcomes.

3.9 This is an outcome which takes highest advantage of:

(a) the locational characteristics of the Project Site including:

(i) its proximity to the economic activity of the CBD, which enables uplift through event-related spending in the CBD, and maximises the accessibility of the Stadium to members of the local and broader communities;

[2] *Appendix GG – Site Development Plan* (Brian Risby, April 2024).
[3] *Annexure C - Ireneinc Planning and Urban Design Planning Report*, submitted in response to the RFI on 17 February 2025, which superseded versions submitted earlier in the process.
[4] *Appendix I - Urban Design Framework*, updated in *Annexure AA – Urban Design Framework* provided in response to the RFI on 31 January 2025.
[5] *Appendix J - Visual Impact Assessment Report* and *Annexure K - Visualisations* submitted in response to the RFI on 31 January 2025, supplemented by *Annexure L - Clarification regarding visualisations* submitted in response to the RFI on 31 January 2025 and *Annexure D - SLR Viewpoint Locations Information* submitted in response to the RFI on 17 February 2025.

(ii) the connection via the Project Site of the CBD to the green heart of the city on the Queen's Domain, the Hobart Cenotaph and to the intercity cycleway and Tasman Bridge;

(iii) the accessibility it offers to current and future sustainable travel options;

(b) its access to services infrastructure such as sewerage, water and electricity which, in the context of a project of this nature, is significant of itself and will help avoid additional works and associated impacts.

3.10 The Project involves a range of proposed uses in addition to the stadium. Consistent with its multipurpose nature, these are:

(a) Business and Professional Services;

(b) General Retail;

(c) Food Services;

(d) Hotel Industry (bars);

(e) Community Meeting & Entertainment;

(f) Passive Recreation; and

(g) a range of other integrated/subservient activities.

3.11 A Planning Report was provided at Annexure C on 17 February 2025, which provides details on the proposed use and activity.

Economic effects

3.12 The Project involves delivery of social infrastructure, which will add social and cultural value to the lives of the people who utilise it providing access to concerts, festivals, sports games and community events that often would not otherwise have been available in the area.

3.13 When assessing the potential benefits and impacts of any project, it is important to consider the Cost Benefit Analysis (**CBA**) alongside the Social and Cultural Analysis (**SCA**), and Economic Impact Assessment (**EIA**), as this ensures consideration of the costs and benefits that can reasonably be monetized and those that are difficult to quantify, as well as looking the project-specific impacts. The SCA and EIA benefits are not highlighted in the Draft IAR, which has the effect of diminishing the broader social, community and economic impacts.

3.14 The CBA for the stadium indicated that stadia are generally not profitable ventures when considered in isolation. The fact that their primary benefits are social and cultural is why they are frequently built by governments, not private developers. By their nature stadia support a vast number of other businesses and tourism opportunities, as well as social benefits.

3.15 This Project will create financial benefits for Tasmania, including through creation of jobs, generation of economic and tourist activity. It will also give rise to:

(a) substantial benefits associated with a Tasmanian AFL team, in connection with events at the stadium itself, and through the creation of community cohesion, pride, and wellbeing; and

(b) a broad range of social and cultural benefits associated with a new mixed-use venue of this scale,

as addressed in the social and community effects section of this document.

3.16 The fundamental differences between the POSS Submission and the Draft IAR's alternative figures and conclusions drawn from those figures, are primarily attributable to the Panel expanding the scope of the Project to include non-Project items, which means the costs it identifies are larger than the costs of the Project as proposed. This has been exacerbated by not considering the corresponding benefits that would arise from the new items added.

3.17 The assessment of economic effects is properly informed by the material submitted and addressing the Project as proposed, which included a Cost Benefit Analysis,[6] Economic Impact Assessment,[7] and Financial Impact Report,[8] together with supplementary information provided in response to the Commission's RFI.[9]

Social and community effects

3.18 The Project has the potential to deliver significant positive social and community benefits, including as critical infrastructure required for the establishment of Tasmanian AFL and AFLW teams.

3.19 As part of the establishment of the Tasmanian AFL team, the *Club Funding and Development Agreement* sets out the AFL's direct investment in local Tasmanian football programs. This contributes to the Project's direct support for the enormous social and community benefits of the strengthened AFL program around the State including for allied learning and health and the attraction and retention of skills, jobs and increased participation in sports at grass roots and youth levels.

3.20 The full range of social and community impacts identified in the Social and Cultural Analysis[10] submitted with the POSS Submission are either not identified, or not fully considered, in the Draft IAR. This analysis is supported by the material provided in respect of the economic analysis, which also identifies (albeit without giving a dollar figure to) broader benefits including the benefits of a sense of local community, community pride and identity, social cohesion and inclusion.

Transport and movement

3.21 The CBD location of the Project is optimal for broader and local transport modes and to take advantage of planned and future infrastructure upgrades over time. The Project has been carefully designed to make the most of its optimal location, both in terms of its own needs and as part of the city.

3.22 The Draft IAR addresses transport and movement in section 7.0, and includes various related comments in other chapters. By response to the key themes, findings and indicative conclusions of the Draft IAR, it is noted that:

(a) the design and development of the Project is informed by detailed consideration of comparable data from other stadia and reliable projections in respect of traffic in 2030 and how people will travel to and from events. Mode share targets are identified to guide planning and contribute to the role of the Project as a catalyst for improvements to the

[6] Appendix E - *Cost Benefit Analysis.*
[7] Appendix F - *Economic Impact Assessment*.
[8] Appendix G - *Financial Impact Report.*
[9] Annexure H - *Supplementary Report*, provided 31 January 2025.
[10] Appendix H - *Social and Cultural Analysis Report.*

broader transport network and support the development of sustainable event transport plans;

(b) the transport mode share targets outlined in the POSS Summary are informed by consideration of: other new and exemplar stadia in Australia and globally; reference to the local context in Hobart and in Tasmania; existing travel behaviours associated with stadia in Tasmania; audience profile for various events; timing of various events; strategic planning mode share targets for business-as-usual transport planning in Greater Hobart and more broadly in Tasmania; and learned behaviour of regular patrons and staged introduction of new transport services over time. They include day one operational targets and aspirational targets;

(c) transport modelling demonstrates that impacts on traffic can be acceptably managed. For example, modelling shows that when the stadium is sold out for a 24,500 seated capacity event, if most patrons arrive by car (60% compared to the target of 40%), traffic will be no worse than the drive to work or school on a weekday morning. If the mode share targets can be met through the use of event day buses and other transport modes, the journey to and from the stadium will be much faster;

(d) the design of the stadium provides adequate space for pedestrian movement before and after events, and while no event is occurring. Direct and substantial attention is given to planning for emergency scenarios including the extraordinary circumstance of a total evacuation, including through design and modelling demonstrating that there are no 'pinch points' or other restrictions stopping relevant standards being met;

(e) the movement of people during large events would mean increased use of existing and future transport networks and temporary disruptions to 'business as usual' in the immediate vicinity, in the same way that the many events already held in Hobart and along the waterfront do. It is proposed to implement transport management plans and events management plans to ensure proper management;

(f) the Proponent's analysis shows there will be sufficient parking to meet the demand arising from large events. This was supported by the analysis undertaken by Hobart City Council and outlined in its Representation; and

(g) the Project will benefit from future transport planning, public transport and infrastructure investment. It will also serve as a catalyst for such investment, improving access and movement for all people in Hobart.

3.23 These matters were the subject of assessment in a range of material produced and provided to the Commission in support of the Project, including in a Transport Study;[11] additional memorandum provided in response to the Commission's RFI;[12] a traffic engineering report focusing on car parking and access;[13] and an Emergency Management and Incident Response report.[14]

[11] *Appendix N - Transport Study (WSP, August 2024).*
[12] *Annexure P - WSP transport and movement matters,* provided 31 January 2025.
[13] *Appendix EE - Car Parking & Access Review: Traffic Engineering Report (Salt3, September 2024).*
[14] *Appendix CC - Emergency Management and Incident Response report (Intelligent Risks, August 2024),* revised in *Annexure V – Revised EMIR Report,* provided 31 January 2025.

Historic heritage

3.24 The design of the Project has been conceived and refined with continuing attention to the heritage sensitivity of the surrounding area. This has been informed by comprehensive assessments which address all issues raised in the Draft IAR (and others).

3.25 Positive impacts include enhancing the ability of the public to appreciate and enjoy heritage places (particularly the Goods Shed) through adaptive reuse and, in due course, integration into the Mac Point precinct.

3.26 Where the Project would result in unavoidable heritage impacts, these would be mitigated and offset to the extent possible through the design phase, including having regard to general and specific management measures for particular places proposed in the POSS Submission material.

3.27 The site and the Project have been carefully investigated and assessed by heritage professionals, having regard to existing heritage values of the site itself and the places around it.[15]

Aboriginal Cultural Heritage

3.28 Aboriginal cultural heritage can be spoken to by Aboriginal people alone. The Proponent is committed to ongoing consultation with Aboriginal people over the course of the Project, and the development of associated spaces in the Precinct such as the Aboriginal Culturally Informed Zone, in recognition of its importance.

3.29 The material prepared in support of the application includes robust archaeological investigations. On the basis of those investigations there can be confidence that impacts can be managed as proposed in the POSS Submission.

3.30 An assessment of cultural landscape values, co-authored by Aboriginal people, was provided with the POSS Submission,[16] but not reflected in the Draft IAR. It remains in draft, given the importance of ongoing consultation.

3.31 The Project also offers meaningful opportunities to recognise Aboriginal cultural history, which the Urban Design Framework explores in detail and will be informed and guided by consultation with Aboriginal people.

Noise and vibration

3.32 Noise and vibration during construction and operation will contribute to the existing active environment of the waterfront and the Port. The noise generated by the Project, particularly during operation, will not be out of keeping with the surrounding noise-related land use in this context.

[15] *Appendix L - Historic Cultural Heritage Impact Assessment - Purcell and GJM Heritage August 2024,* and *Appendix M – Historical Archaeological Assessment Sensitivity Report and Method Statement - Alan Hay 20 August 2024.*

[16] *Appendix HH - Pre-Stadium Cultural and Landscape Values Assessment - Southern Archaeological.*

3.33 As an important consideration in construction and operation of the Project, noise and its potential impacts were the subject of detailed assessments. This includes a Noise and Vibration Assessment,[17] and a supplementary report.[18] The assessments indicate that:

(a) construction noise and vibration can be appropriately managed through the Construction Environment Management Plan (**CEMP**), and specific Construction Noise and Vibration Management Plan; and

(b) noise from sporting events and general operations of the Stadium are predicted to be *'just noticeable'* or *'unlikely to be noticeable'* relative to existing ambient noise levels at sensitive receptors around the site. Noise from sirens and during concerts will exceed those noise levels, but intermittently and not inconsistently with current experiences during events and otherwise.

3.34 A Site Environmental Management Plan was also provided,[19] which addresses noise and vibration during remediation of contamination at the site.

Lighting

3.35 Light spill from the stadium will be minimal.

3.36 Lighting at and around the stadium is minimised through project design, including particularly the roof and the opportunity it offers to avoid the greater impact of light towers. The assessment of lighting at and around the stadium was carried out in accordance with the relevant Australian Standard, using modelling, conservatively assuming the maximum level of light output, to identify potential interactions with surrounding uses and impacts on the environment.

3.37 Based on the assessment, stadium lighting can be designed and managed to avoid an unacceptable impact on:

(a) animals;

(b) neighbouring land uses, including the Port;

(c) users of surrounding roads; and

(d) nearby areas of significance including the Cenotaph.

3.38 In addition to their management through design, potential impacts would be further reduced in various ways, including operating restrictions and lighting controls. These measures would be addressed through the detailed design process and the Events Management Plan required by the conditions proposed by the Proponent.

3.39 The lighting assessment provided with the POSS Submission[20] was supplemented by information confirming it is detailed, and not 'concept level'.[21]

[17] *Appendix Q - Noise and Vibration Assessment (AECOM).*
[18] *Annexure Q – Noise Assessment supplementary report*, provided in response to the RFI on 31 January 2025.
[19] *Appendix LL – Site Environment Management Plan prepared by AECOM (22 October 2021).*
[20] *Appendix P – Lighting Assessment and Electrical & Hydraulic Infrastructure*.
[21] *Annexure R – Lighting assessment (memorandum)* provided in response to the RFI on 31 January 2025; compare Draft IAR, p 117.

Construction

3.40 Construction of the Project would be managed in accordance with a CEMP, as one piece of the broader environmental management framework, consistent with best practice for major projects.

3.41 The location of the site means construction activities can largely proceed without impacting movement around or enjoyment of Hobart.

3.42 Specific impacts, such as noise during the construction phase, are the subject of specific recommendations in documents provided with the POSS Submission and in response to the Commission's RFI. They would be implemented through the preparation of the CEMP.

3.43 A draft Construction Management Plan was provided with the POSS Submission,[22] demonstrating ways construction is planned to be managed. This was supplemented by specific information in respect of construction of the underground carpark, and timing of the work.[23]

Wind Effects

3.44 The assessments of wind effects within and around the stadium comprised of an analysis of regional wind climate and a wind tunnel study.[24]

3.45 These assessments concluded that in most cases, the proposed buildings within the Project area result in similar or improved pedestrian comfort conditions compared to not having the buildings and wind comfort is expected to be good within the stadium.

3.46 The extensive work undertaken to date will inform the detailed design and construction of the development of the Project and wider precinct. The geotechnical recommendations are in the application material are appropriately achieved through conditions of approval.

Contamination, remediation and groundwater

3.47 While the Project Site is subject to legacy soil and groundwater contamination, extensive work has been undertaken and advice provided by an independent Environmental Auditor to verify the remediation work.[25]

3.48 As recognised in the POSS Submission, contamination must be properly understood and responded to in developing the Project to ensure potential adverse effects on human health and the environment are mitigated. The extensive investigations, and remediation of part of the Project Site, mean that the Project is well prepared for the detailed design phase. The management of contamination would be addressed through conditions requiring a CEMP, including soil, acid sulfate soil and water management plans. This approach is appropriate for the scale and significance of the Project.

3.49 Based on the investigation and remediation undertaken to date and the proposed measures, soil and groundwater contamination, acid sulfate soils and excavated material can be acceptably managed.

[22] *Appendix AA – Construction Management Plan*.
[23] *Annexure B – Zancon Construction Management Plan comments (memorandum),* provided in response to the RFI on 17 February 2025.
[24] *Appendix O – Wind Comfort Assessment*; *Annexure C – AECOM Australia response on Wind*, provided in response to the RFI on 4 March 2025.
[25] *Annexure U – Environmental Auditor Opinion*, provided in response to the RFI on 31 January 2025.

3.50 The POSS Submission covers these areas within the following Solid Waste and Hazardous Material Management, Site Remediation Strategy Update 2024, Conceptual Hydrogeological Model and Numerical Model Memo and Preliminary Results of Acid Sulfate Soil Investigation.[26]

Stormwater

3.51 The POSS Submission explains the detailed stormwater analysis undertaken in respect of the Project and sets out the proposed further design and ongoing stormwater management plan that would occur following approval of the Project.

3.52 Information was contained within the POSS submission in the Stormwater Management Plan[27] and stormwater management information provided on 31 January 2025.[28]

Flooding and coastal inundation

3.53 A comprehensive analysis of the flooding impacts has been undertaken. The application material demonstrates that there is no flood risk on the Project Site. There is potential for some properties surrounding the Project Site to be affected during a 1% Annual Exceedance Probability (AEP) flood event. These impacts are capable of being managed through the OEMP and the EMP required by the conditions proposed by the Proponent.

3.54 These matters were addressed in the POSS submission in the Overland Flood Assessment and Coastal Inundation Assessment.[29]

Topics not considered in the Draft IAR

Geotechnical

4.1 Geotechnical was not covered within the Draft IAR. A comprehensive geotechnical investigation has been conducted to assess ground conditions at the Project Site, involving analysis of existing subsurface data from over 700 borehole investigations carried out within the last 9 years as well as recent vertical borehole drilling, Cone Penetration Testing and Dilatometer testing and a targeted sampling regime. The data obtained from these investigations has been used to create a 3D model of the geotechnical characteristics of the Project Site. These comprise a mix of fill, estuarine and alluvium soil and dolerite rock. Design recommendations for foundational works are set out in Chapter 10.3.3 of the POSS Submission.

4.2 Geotechnical matters were covered in:

(a) Chapter 10 of the Summary Report;

(b) Attachment II – Geotechnical Factual Report; and

(c) Appendix X – Geotechnical Interpretive Report.

[26] *Appendix T – Solid Waste and Hazardous Material Management*, *Appendix V – Site Remediation Strategy Update 2024*, *Appendix GG – Conceptual Hydrogeological Model and Numerical Model Memo*, *Appendix KK – Preliminary Results of Acid Sulfate Soil Investigation.*
[27] *Appendix S – Stormwater Management Plan.*
[28] *Annexure T – Supplementary information*, provided in response to the RFI on 31 January 2025.
[29] *Appendix W – Overland Flood Assessment, Appendix U – Coastal Inundation Assessment.*

Natural Values and Climate Change

4.3 A comprehensive natural values assessment has been conducted to assess the biodiversity and ecosystems impacts of the Project as well as the Project Site's surrounding hydrology and ecology. There were no signs and/or presence of threatened flora or fauna observed within the project area.

4.4 The assessments were included within the POSS Submission in a Natural Values Assessment and a Heat Risk and Climate Change Assessment.[30]

Conclusion

5.1 **Attachment 1** tabulates the Proponent's responses to the findings, conclusions and issues raised, and identifies key matters not addressed or acknowledged, in the Draft IAR.

5.2 This Representation, responding to the topics both considered and omitted from the Draft IAR, should be read in conjunction with **Representation 1** and **Representation 2**. These outlined concerns with the unreasonable extension of the scope of the Project; the limitation of the Draft IAR to issues only, while making findings prior to representations or considering potential conditions or mitigations; failing to properly assess the Project as intended by the application of s19 of the SPP Act; adoption of untested assumptions from the 'Gruen Report'; and consideration of an exaggerated scope of economic and financial considerations that go beyond the reasonable range of project benefits and impacts that should be assessed for the purposes of an assessment under the SPP Act and the Objectives of the Resource Management and Planning System of Tasmania.

5.3 The Proponent considers the information submitted outlines a comprehensive description of the Project, that it can be delivered safely, effectively and as a new landmark development as part of, and adding to, the city, region and state; and that the Project should be approved on suitable conditions.

[30] *Appendix R – Natural Values Assessment, Appendix Y – Heat Risk and Climate Change Assessment.*

ATTACHMENT 1 TO REPRESENTATION 3

1. This document sets out the Proponent's response to the matters identified and not identified in the Draft IAR by topic.

2. This document is structured as follows:

A. Economic effects

Summary and key facts

3. The Project involves the delivery of social infrastructure, which will add social and cultural value to the lives of the people who utilise it providing access to concerts, festivals, sports games and community events that often would not otherwise have been available in the area.

4. When assessing the potential benefits and impacts of any project, it is important to consider the Cost Benefit Analysis (**CBA**) alongside the Social and Cultural Analysis (**SCA**), and the Economic Impact Assessment (**EIA**), as this ensures consideration of the costs and benefits that can reasonably be monetized and those that are difficult to quantify, as well as looking at the project-specific impacts. The SCA and EIA benefits are not highlighted in the Draft IAR, which has the effect of diminishing the broader social, community and economic impacts.

5. The CBA for the stadium indicated that stadia are generally not profitable ventures when considered in isolation. The fact that their primary benefits are social and cultural is why they are frequently built by governments, not private developers. By their nature stadia support a vast number of other businesses and tourism opportunities, as well as social benefits.

6. This Project will create financial benefits for Tasmania, including through the creation of jobs and the generation of economic and tourist activity. It will also give rise to:

   (a) substantial benefits associated with a Tasmanian AFL and AFLW teams, in connection with events at the stadium itself, and through the creation of community cohesion, pride, and wellbeing; and

   (b) a broad range of social and cultural benefits associated with a new mixed-use venue of this scale,

   as addressed in the social and community effects section of this document.

7. The fundamental differences between the POSS Submission and the Draft IAR's alternative figures and conclusions drawn from those figures, are primarily attributable to the Panel expanding the scope of the Project to include non-Project items, which means the costs it identifies are larger than the costs of the Project as proposed. This has been exacerbated by not considering the corresponding benefits that would arise from the new items added.

8. Because the consideration of economic and social and community effects are related, regard should also be had to the section of this document referring to social and community effects.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p17, [1.0]	Findings regarding approach to and outcome of CBA and economic assessments generally.	The economic analysis provided in the CBA (POSS Submission Appendix E Cost Benefit Analysis), EIA (Appendix F Economic Impact Assessment), Appendix G (Financial Impact Report), and in RFI Annexure H (Supplementary Report) provided 31 January 2025 (together, the **Economic Assessment Material**) are detailed, address matters raised in the Draft IAR, and (to the extent it addresses matters within scope) continues to provide a reliable basis on which the economic effects of the Project can be identified to inform the integrated assessment. The approach of the Draft IAR to the assessment of economic effects involves multiple errors addressed in **Representation 1** and **Representation 2**. This includes an expansion of the scope and considering costs outside of the Project scope, yet not considering the

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			corresponding benefits of the additional items added. These errors mean the figures presented in the Draft IAR as products of the work of Dr Gruen and of the Panel are unreliable. The below responses are provided in this context.
2.	p17, [1.0]	The Proponent's cost-benefit analysis (**CBA**) understates costs because it excludes expenditure in the surrounding precinct which is not part of the Project proposed by the Proponent. At pages 18-38, the Draft IAR includes various statements of calculated costs of non-Project items.	Such costs are not costs of the Project. They relate to the broader activation of the site and surrounding areas, including items that are already planned and in progress. It is proper to not include them in the CBA.
3.	p17, [1.1(a)]	It is appropriate to assess the costs and benefits of the Project together with a Tasmanian-based AFL team.	This is agreed, however, it is noted that this is inconsistently applied throughout the Draft IAR where it is noted as consciously excluded in some areas and acknowledged as intrinsically linked in others. For example, Attachment D of the Draft IAR states the following '*The stadium is required for the team to be established under the agreement with the AFL – that is, the team is dependent on the stadium. Furthermore, the stadium is dependent on the team as there is no case for constructing the stadium unless there is a Tasmanian AFL team. Effectively, the benefits of the team and the stadium are interlinked and cannot be logically or practically separated*.' However, the Draft IAR states the Panel found the Project's positive social and cultural effects rely primarily on the establishment of the Devils teams and their entry into the AFL/AFLW, and associated investments into the sport ecosystem, rather than the physical establishment of a stadium, and considered this not relevant.
4.	p18, [1.1(e)]	The calculated benefit-cost ratio must meet a "required level of one".	No such 'requirement' is found in any relevant guidance, or in any precedent for similar projects, assessments or in objectives stated for the Project. The benefit-cost ratios quoted in the Draft IAR all represent an acceptable basis for an infrastructure project that will deliver substantial social benefits and which the project will sustain for generations. A large component of the benefit of the Project is not quantifiable or not able to be monetised – for example, the social benefits of the Tasmanian AFL team. In contrast, costs are generally easily monetised. This leads to comparative imbalance between the benefit and cost sides of the ratio.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			This is addressed in POSS Submission Appendix E (Cost-Benefit Analysis), at p 2. The product of a CBA cannot be taken in isolation. The conclusions expressed in the POSS Submission as to the positive economic and social effects of the Project are valid in the context of the integrated assessment of the Project, whatever BCR quoted in the Draft IAR is adopted.
5.	p21-32, [1.1(g)-(rr)]	Assumptions are adopted in respect of costs and benefits which differ from those presented in the POSS Submission material. An example is provided below in respect of assumptions made in respect of visitation.	The Economic Assessment Material proceeds on the basis of a quantification of costs and benefits (where capable of quantification) which is informed by direct engagement with relevant stakeholders and the experience of the authors. For example, it is reasonable and consistent with such engagement to proceed on the basis that the cost of fitting out amenities internal to the stadium will be borne by commercial tenants and operators; such costs are assumed to be part of the cost of the stadium for the purposes of the Draft IAR. The potential for reasonable differences in estimates and forward projections is acknowledged. The Proponent observes that the primary differences between the figures presented by the Economic Assessment Material and the other figures presented in the Draft IAR relate to costs, and particularly construction costs, which vary due to the inclusion of matters which do not form part of the Project.
6.	p21, [1.1(g)-(i)]; p 27, [1.1(r)]; pp 28-29, [1.1(u-(x)]	Visitation assumptions differ between the Economic Assessment Material and the Draft IAR (and, in turn, the report referred to in the Draft IAR authored by Dr Gruen). The Draft IAR sets out the primary reasons for these differences at p 27, [1.1(r)].	The assumptions regarding visitation in the Economic Assessment Material are primarily addressed in the POSS Submission CBA. <u>Interstate visitation numbers</u> The CBA determines a 20-25% interstate visitation number is reasonable, depending on the event (excepting community events). Previous analysis by MI Global Partners and PwC for the project also included estimates of 20-25% interstate and international visitation which is significantly above that determined by the Commission and Dr Gruen. All relevant estimates in the CBA are reasoned and benchmarked. The Hawthorn analysis of interstate visitation for AFL events and the involvement of two inter-state teams was considered as well, as: • the previous study was based on interstate teams with a membership level significantly lower than the average of all AFL teams – the stadium is expected to host interstate teams with higher memberships; • the previous study was based on interstate visitation to Launceston – based on the proportionately higher visitation levels for Hobart,

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			accessibility and attractiveness is expected to result in higher visitation; • with a Tasmanian team, there is an expectation of increased visitation arising from expatriate Tasmanians visiting to support the Devils; • the difference in fixtures will result in the stadium having scarcity of opportunity to travel to Tasmania (i.e. a team may only appear in Hobart every 1 or 2 years) increasing the propensity to travel; and • a Tasmanian team may also generate increased branding awareness of Tasmania with a national audience further increasing destination attractiveness and increasing propensity to travel. <u>Non-AFL events</u> In relation to non-AFL events the analysis: • referenced actual visitation for one-off cricket matches from Cricket Australia; • considered major events with large-scale visitation in Tasmania, namely Dark Mofo and Mona Foma, which attract inbound visitation of 36 per cent;[1] however it is acknowledged the limited benchmarks for entertainment events by reducing the benchmark of 36 per cent to 20 per cent to account for this. <u>Length of stay of interstate visitors</u> Regarding length of stay of interstate visitors: • visitors' average length of stay assumed was assumed to be 2.5 days by the Draft IAR, compared to 3.1 days in the CBA analysis. The average length of stay assumption was based on research published by Tourism Research Australia, discounted by 28%; and • the Draft IAR noted that length of stay is different for short- and long-haul travellers. The benchmark underpinning the CBAs assumption of 3.1 days was made up only of interstate travellers, and as such any visitation by long-haul travellers would be an additional benefit to that quantified in the CBA. The Draft IAR has adopted the same average spend per day of $258 as per the CBA.

[1] CBA, p 19.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
7.	p36, [1.2(d)]	The computable general equilibrium modelling reported on in the *Economic Impact Assessment* is sound.	Noted. The relevant benefits identified through this modelling include: • the creation of 1,510-3,229 total FTE jobs over the construction period; • generation of incremental GSP of $250m –$269m during construction; • creation of 203-204 FTE jobs on an ongoing basis as a result of the stadium's operations; and • generation of incremental GSP of $27m – $32m per annum during operation.
8.	p36, [1.2(e)]	The relevant question for the purposes of the economic impact assessment is whether and by how much the investment of funds in the Project would provide economic stimulus over and above an alternative application of these funds.	The assessment of a project should consider its impact and merits. As outlined in **Representation 1** and **2**, matters relating to broader state budget and investment decision making are for influenced by a number of factors. The fact that funds could be invested or used elsewhere may be relevant to a CBA but does not form a proper basis for assessment of financial impact. It is not a relevant matter for determining whether land use and development approval should be granted.
9.	p36, [1.2(d)]	The Project would not generate a net economic benefit for Tasmania compared to an alternative public investment of the same financial magnitude, because: • it can be assumed that expenditure on construction of a stadium would have a similar economic impact to investment in other assets, • during operation, increases in output, employment and income are low for the level of public investment proposed.	Per the response above, this conclusion is premised on a question which is not central to the integrated assessment of the Project. As in the case of other responses, this assumption is also affected by the Commission's extension of the scope of the Project to include non-Project items.
10.	p37 et seq, [1.3]	Matters relevant to State finances.	As identified in **Representation 2** these matters are not within scope of the integrated assessment.

Other matters not considered in Draft IAR

9. In its consideration of economic effects, the Draft IAR does not acknowledge the relevance of unquantifiable social benefit to consideration of metrics such as the benefit-cost ratio.

B. Social and community effects

Summary and key facts

10. The Project has the potential to deliver significant positive social and community benefits, including as critical infrastructure required for the establishment of Tasmanian AFL and AFLW teams.

11. As part of the establishment of the Tasmanian AFL and AFLW teams, the *Club Funding and Development Agreement* sets out the AFL's direct investment in local Tasmanian football programs. This contributes to the Project's direct support for the enormous social and community benefits of the strengthened AFL program around the State including for allied learning and health and the attraction and retention of skills, jobs and increased participation in sports at grass roots and youth levels.

12. The full range of social and community impacts associated with the Project are addressed in the POSS Submission, and are summarised in the Summary Report at pp 130-131. They include a range of benefits either not identified or not fully considered in the Draft IAR. It is important to note that the impact of the Project should not consider the CBA in isolation and should also consider the SCA,[2] and EIA.

13. Broader benefits typically not able to be monetised in a CBA were considered in the SCA, including the benefits of a sense of local community, community pride and identity, social cohesion and inclusion.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p39, [2.1(a)]	The Proponent's reports and assessment within the CBA and the SCA of positive outcomes and impacts for the community rely predominantly on the establishment of the Devils teams and the entry of these teams into the AFL/W rather than the physical infrastructure of the stadium itself.	This is a primary source of social, community, and economic benefit. The Draft IAR inconsistently treats these as separate. In Appendix D of the draft report, it explicitly states and acknowledges that the establishment of the Tasmanian AFL and AFLW teams and the stadium are linked. However, the social and community benefit analysis does not consider this, despite this critical link. It is important to note that the assessment of impacts of the Project should not consider the CBA in isolation and should also consider the SCA, and EIA.
2.	p40, [2.1(f)]	There is potential for positive impact on the sense of community due to the establishment of Tasmanian AFL	The Proponent agrees that this benefit is likely.

[2] POSS Submission Appendix H, *Social and Cultural Analysis Report* (**Social and Cultural Analysis**).

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		teams. This would result regardless of the home stadium of these teams.	The delivery of a stadium at Macquarie Point is a requirement for the Tasmania Devils to receive a licence to participate in the AFL. It cannot be assumed that this benefit could be achieved through the delivery of, or residence of the teams at, any other stadium. This finding also ignores the motive for locating the stadium near Hobart's other attractions to maximise its appeal and the appeal of the AFL and AFLW teams.
3.	p39, [2.1(b)]	There would be substantially less positive community impact if the stadium were to be built without the Tasmanian AFL teams.	The Tasmanian AFL and AFLW teams can be assumed to be established if the Project is delivered, pursuant to the *Club Funding and Development Agreement* made by the State and the AFL on 3 May 2023. Accordingly, it can be assumed that these benefits will be achieved.
4.	p41, [2.2(a)]	The Proponent's reports and assessment within the CBA and the SCA of positive outcomes and impacts rely predominantly on the establishment of the Devils teams and the entry of these teams into the AFL/W, and associated investment into the sport ecosystem for AFL participation, rather than the physical infrastructure of the stadium itself.	The comment at item 1 above is repeated. As the POSS Submission Summary Report identifies, the State-AFL agreement commits the AFL to investing $360 million in local grass roots and community football in Tasmania. This investment would occur as a consequence of the delivery of the Project and is reasonably taken into account in considering the benefits of the Project. It would be artificial to confine the scope of consideration of social and community impacts to effects of the building itself. In this case it is not correct to separate the infrastructure from a known anchor tenant.
5.	p41, [2.2(c)]	Investments by the AFL into the Tasmanian sport ecosystem have some limited potential to enhance the physical and mental health of the Tasmanian community, but these benefits cannot be attributed directly to the stadium itself.	This investment would occur as a consequence of the delivery of the Project and is reasonably taken into account in considering the benefits of the Project. It is not clear why the Draft IAR describes this potential as limited.
6.	p42, [2.2 (Context)]	There is some evidence that attending events in stadiums contributes to subjective well-being for sport fans, but this is largely connected to club membership and team fandom, rather than attributable to a stadium per se. The same impacts are just as likely to occur in other settings (e.g. watching a game at the pub with friends) and via online fan communities, as they are in the stadium itself.	Consistent with comments above, the Project is required in order for Tasmanian AFL and AFLW teams to be established. Without it, there would be no potential for positive effects to arise from club membership or team fandom – or attendance at events. It is not agreed that the benefits of pub or online viewing are the same or have the same role in supporting social cohesion.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
7.	p40, [2.1(c)]	There is some limited potential for the stadium itself to enhance a sense of community as a result of local and Tasmanian residents' attendance at sports and cultural events.	The Proponent agrees that this benefit is likely, but has greater than limited potential. As the SCA explains attendance at events has the potential for benefits beyond enhancement of a sense of community: see particularly "Positive Impact 5: Increased civic pride and community cohesion" (p 17 et seq) and "Positive Impact 7: Improved subjective wellbeing" (p 22 et seq).
8.	p40, [2.1(d)]	The quality and shared use of open spaces have the potential to engender a sense of community and improve community wellbeing, but this is limited by the size and scale of the stadium.	The design of these spaces is an important consideration, including having regard to the potential to achieve this benefit. This will be realised through further design including particularly the preparation of the Urban Design and Landscape Plans (**UDLPs**) required by conditions.
9.	p40, [2.1(d)]	An opportunity exists for Aboriginal communities to express their values and culture throughout all of the public space available.	Agreed. Continuing consultation with Aboriginal communities is expected to inform design including through the preparation of UDLPs as required by the proposed conditions. This topic is addressed in **section E** below.
10.	p40, [2.1(e)]	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 Hobart more broadly due to significant visual change in the landscape.	The Project has been designed and developed to deliver these changes in a way which creates a new, positive relationship between the community and its environment. This potential negative impact is to be balanced against the positive effects of such changes as part of the establishment of Tasmanian AFL and AFLW teams and a stadium to be proud of (see SCA, 'Positive impact 5: Increased civic pride and community cohesion', p 17 et seq). This finding does not align with experiences elsewhere where residential locations near stadiums are encouraged and valued.
11.	p42, [2.2(g)]	There is little to no empirical evidence that a stadium and the events it hosts lead to increases in sport participation or associated physical and mental health benefits.	Consistent with the responses at item 2 above, it is appropriate to have regard not just to the built form and use of the stadium, but to the establishment of Tasmanian AFL and AFLW teams. As the AFL Licence Taskforce recognised, the introduction of Tasmania's first VFL team was associated with a large spike in participation (POSS Submission Appendix MM, AFL Licence Taskforce Business Plan 2019, p 32). On this basis it is reasonable to expect improved participation rates with the foundation of Tasmanian AFL and AFLW teams. The research identified in the 'context' at pp 42-43 of the Draft IAR largely focuses on effects of elite sporting events such as Olympic Games on public participation rates in relevant sports. It is not directly relevant to the

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			Project or the effects of establishment of the Tasmanian AFL and AFLW teams. Anecdotal and lived experience in Australian cities would suggest otherwise.
12.	p42, [2.2]	Due to the capacity limitations of any stadium, the community-level benefit of fan/team engagement is a substantially greater number of Devils fans more broadly watching and engaging in non-stadium settings, than those attending in person at a game in the stadium.	This recognises the potential for benefits of the Project to extend beyond the maximum capacity of the stadium, or to those attending any particular event. As noted in the SCA, this reflects the civic pride in the new Tasmanian AFL and AFLW teams, and associated games, demonstrated through the significant uptake of club memberships since the launch of the Tasmania Devils (p 19).
13.	p43, [2.3(b)]	It is reasonable to expect that there may be some limited or localised sense of pride around having a stadium that could host events that would not necessarily come to Hobart or Tasmania otherwise.	This positive impact is identified and assessed in the SCA (p 17 et seq).
14.	p44, [2.3(d)]	There is some potential to realise positive impacts of sport diplomacy outcomes – such as state/city branding and reputation, tourism and trade – from the hosting of more and higher quality events in Hobart and Tasmania. However: • the Proponent's reports recognise that additional and ongoing Tasmanian Government funding for event attraction would be required to win event bids and to support related trade and business activities; and • these benefits cannot be solely attributed directly to the proposed stadium, as some are or could be realised via existing infrastructure.	The Economic Assessment Material, and the economic effects section of the Draft IAR, acknowledge and have regard to event attraction costs. An objective of the Project is to "*add to the existing venues available for cultural, business, community and non-sporting events available, and attract visitors and new events to the state*".[3] Section 1.1 of the Summary Report describes a range of events that could be hosted at the stadium, but not in other existing venues, together with some events which could otherwise be hosted elsewhere.
15.	p44, [2.3 (Context)]	For tourism and trade benefits from hosting sporting and cultural events and using events hosted at stadiums to showcase the host city and state, any sport infrastructure development needs to ensure that the surrounding public	The Project's relationship with surrounding land uses and infrastructure is addressed in **sections F** and **G** below. In addition to the careful consideration given to ensuring the Project maximises the opportunities of its location to take advantage of existing infrastructure and access, it is expected to serve as a catalyst for investment in infrastructure over time.

[3] Summary Report, p 12 [O.2.3], objective 7.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		infrastructure supports these aims, and its use is supported by active programming.	It is reasonable to assume active programming during the operation of the stadium.

Other matters not considered in Draft IAR

14. The Draft IAR does not address the full range of potential benefits identified in the SCA, which include:

(a) employment and increased human capital;[4]

(b) increased investment and exports;[5]

(c) economic uplift for Tasmania, in the short-[6] and long-term;[7]

(d) increased civic pride and community cohesion;[8]

(e) improved physical and mental health;[9]

(f) improved subjective wellbeing;[10]

(g) improved athlete experience;[11]

(h) improved amenity for Stadium visitors;[12] and

(i) improved liveability.[13]

[4] Social and Cultural Analysis, p 11 et seq.
[5] Social and Cultural Analysis, p 13 et seq.
[6] Social and Cultural Analysis, p 14 et seq.
[7] Social and Cultural Analysis, p 16 et seq.
[8] Social and Cultural Analysis, p 17 et seq.
[9] Social and Cultural Analysis, p 20 et seq.
[10] Social and Cultural Analysis, p 22 et seq.
[11] Social and Cultural Analysis, p 24 et seq.
[12] Social and Cultural Analysis, p 26 et seq.
[13] Social and Cultural Analysis, p 28 et seq.

15. Nor does it address the range of potential negative impacts, which include disruption to local businesses and residents, short-term housing supply impacts, environmental impacts and visual impacts, each of which has proposed mitigations identified in the SCA to ensure appropriate management and minimisation.

16. On balance, the positive social and community benefits of the stadium significantly outweigh any negative impact, to an extent which makes positive social and community effects of central importance to, and in support of, a positive integrated assessment. As noted above, this contribution is important to consider as part of the broader contribution of the project alongside the CBA and EIA, in order to consider the total potential benefits and impact.

C. Urban form and planning

Summary and key facts

17. The application material supports a land use and built form on this site that is transformative, iconic and prominent. This is appropriate for the site's potential and the purposes of the MPDC Act directing its renewal.

18. The scale and design of the stadium is designed for its location. It is not a large stadium in comparative terms, either in terms of wall height or general height. Its design is sculpted such that the roof is dome-like and its high point is central to the site. This results in an overall form that minimises height where it is not required, assisting in establishing a height at street interface that is comparable to the scale of existing buildings. Its form is an object that is intended for this prominent site and to provide identity to the site and the city.

19. The Project site presents an opportunity for a stadium central to a broad catchment, and which can relate to other businesses and attractions, as well as ongoing and future infrastructure improvements directed at movement in and around the city.

20. Potential impacts associated with events at the stadium, including from noise, lighting, and having regard to the movement of people, can be appropriately managed .

21. The use of the land for a stadium optimises the preservation of a public land asset for public access and enjoyment for generations to come.

22. Many of the Proponent's comments in response to the Draft IAR relate to a difference in approach. The POSS Submission material addresses contemporary planning including the 2024 *Mac Point Precinct Plan* and the principles produced through the site-specific 'reset' the Site Development Plan submitted in the POSS Submission at Appendix GG (Site Development Plan – Brian Risby, April 2024) (**SDP**). Whereas the Panel's assessment relies on largely on, or expects compliance with, the *Sullivans Cove Planning Review 1991* (**1991 Review**), which is largely silent on how the Macquarie Point site should be developed. It should be noted as outlined in Representation 1 and 2 that the SPP Act 'turns off' the planning provisions that would usually apply to use or development.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
Urban form of Sullivans Cove and Hobart city			
1.	p45, [3.1(a)]	The proposed stadium form contradicts several key strategic planning principles and strategies for Sullivans Cove and central Hobart.	The Project Site represents a strategic opportunity, where change is appropriate and to be expected. The proposed use for a stadium presents a fundamental shift from prior planning for the Project Site. It brings with it public visitation and public

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			ownership and a sense of place that is wholly different from that which would be expected from other land uses, with the precinct acting as a destination, rather than its historical role as a support or service area. A landmark, or highly visible built form is a reasonable consequence given the strategic potential of the Project Site. Historical planning for Sullivans Cove and central Hobart does not accommodate these potential outcomes. Commencing the assessment of the built form of the stadium by reference to principles that focus on other precincts of Hobart establishes a premise inconsistent with the legislative recognition of the Project Site as a strategic opportunity, and with the project of State significance process. The SDP sets out the planning context for the purposes of the development of the Mac Point Precinct, by building on the character of the Project Site, and considering principles more consistent with its strategic opportunity and specific potential role. The architectural response exhibits a high level of consideration for these principles and its physical context, introducing a stadium that is a sculpted form, visually interesting, informed by the place and worthy of its prominence in broader views to the city.
2.	p45, [3.1(b)]	The 1991 Review is a key strategy that establishes the foundational development principles for the area, derived from the landscape character and history of the area.	Development principles for the Project Site are developed in the SDP and the Mac Point Precinct Plan (2024) (POSS Submission Appendix JJ). In each case, development principles are derived from the landscape, character and history of the area. These principles are adopted in the design of the stadium and the Project more broadly, including as explained in RFI Annexure C (Planning and Urban Design Planning Report) submitted 17 February 2025. The 1991 Review is not an appropriate starting point for a design assessment for this Project, particularly in the context of a project that has been identified as a project of State significance and does not provide an appropriate benchmark or source of metrics or principles to be given significant weight in the integrated assessment of the Project. In particular: • the task for the 1991 Review was to take a broad view of built form strategies for areas then under different planning schemes and multiple decision makers. It did not seek to form planning controls or

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment

			requirements. It also noted flexibility was required as needs were expected to change over time;
			• the 1991 Review was primarily focused on areas with established built environment and character and how new development might knit in with height, scale and street wall relationships. None of which applied then or today at the subject site;
			• the 1991 Review was prepared 20 years prior to the introduction of the MPDC Act, which, supported by a federal funding program, envisages transformative change for the Project Site and wider precinct. This legislated impetus was not, and could not have been, appreciated in the 1991 Review. The legislation sets a reasonable expectation for land use and built form transformation and character change in this precinct.
			• it is evident from the 1991 Review that the Project Site was peripheral, if not exempt from most, if not all, of the "specific" guidance provided. On a complete reading of the 1991 Review, it can be seen that:
			  ○ the Project Site was identified as not forming part of the original Macquarie Plan area;
			  ○ it was not included as within the Main or Secondary areas of Sullivans Cove;
			  ○ identified as 'other area', it was also not subject to built form considerations applying to established areas including siting, design, wall or quarry principles. It is also not identified as a step area for the connection through buildings rising through the CBD;
			  ○ the Project Site is identified in the Review as 'LOST SPACE', and as having a civic supporting function (presumably car parking);
			  ○ the aspirations for the Project Site in 1991 were essentially for car parking and transport, perhaps realistic in the 1991 economy but falling well short of the aspirations later legislated under the MPDC Act;

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			○ the Project Site was not the subject of specific consideration for built form outcomes, other than a blanket 15m height measured to the eave and linked to its transport function, and ○ there is no basis to conclude the Project Site fell within the description of 'sensitive area' where used throughout the document.
3.	p46, [3.1(c)-(f)]	By reference to the 1991 Review, a primary principle for development in the area is to respect and reflect the natural 'amphitheatre', meaning the natural layered form of the landscape from the mountain and its foothills to the flat water and wharf areas of Sullivans Cove. The stadium would not respect the natural layered form of Hobart and its form would not emphasise or expose 'the fall' between the city and the Cove, as it obscures the intended form of the natural headland of the Cenotaph.	The stadium's visibility in views taking in the natural 'amphitheatre' does not result in any significant change to the character of the natural form, or the ability of a viewer to perceive it. Change, or novelty, cannot be equated to unacceptable impact. These issues are addressed in the Urban Design Framework[14] (**UDF**) and Visual Impact Assessment Report[15] (**VIAR**) submitted to the Commission, as supported by further material submitted in response to the Commission's RFI.[16] Relevant planning principles are identified and assessed in the Ireneinc Planning and Urban Design Planning Report (RFI Annexure C submitted 17 February 2025). Compatibility with the 1991 Review is not an appropriate test to be applied in the context of the integrated assessment. It should be noted that the SDP observes that the Project Site is appropriate for higher development than that allowed on the cove floor based on historic industrial land use and detailed urban design analysis.
4.	p46, [3.1(g)]	Recent planning (namely the Central Hobart Plan) reinforces the amphitheatre principles of the 1991 Review.	The Central Hobart Plan does not apply to the Macquarie Point precinct. It recognises Macquarie Point as a key development site, which is subject to its own, distinct planning process (p 6). However, the stadium is consistent with the topographical setting of the city, and the concept of Hobart as a 'small city in a large landscape', as identified in the Central Hobart Plan (p 36).

[14] RFI Annexure AA submitted 31 January 2025, being an update of POSS Submission Appendix I.

[15] POSS Submission Appendix J.

[16] Namely RFI Annexure K - Visualisations submitted 31 January 2025; Annexure L - Clarification regarding visualisations submitted 31 January 2025; and Annexure D - SLR Viewpoint Locations Information 17 February 2025.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
5.	p46-47, [3.1(h)-(l)]	The prominence, bulk and height of the stadium mean it is incompatible with principles of the 1991 Review seeking to control bulk to avoid dominant buildings and discouraging land uses which require very large, undifferentiated floor areas and dictate high and bulky buildings. There is inadequate space on the Project site to accommodate design treatments that could achieve any meaningful buffer, transitioning or softening of its form.	The stadium would not materially change the perception of layering of built form rising from the docks through the heritage scale 'wall' and through the CBD. These values will remain in the aspects analysed in the 1991 Review. Compatibility with the 1991 Review is not an appropriate test to be applied in the context of the integrated assessment.
6.	p47, [3.1(m)-(p)]	The alignment of the stadium is inconsistent with principles of the 1991 Review relevant to the design of buildings, including their encouragement of buildings built to the street line and with active frontages.	At the time the 1991 Review was produced, the Project Site was a rail yard. Consistent with above responses, the 1991 Review does not address the Project Site as a site for potential development, such that its reference to buildings on Evans Street is properly read to relate to buildings on its western side. A building of the type proposed is appropriate, in terms of the response to Evans Street, given the nature and context of the Project Site. The stadium's design and orientation provides an appropriate response to Evans Street. Compatibility with the 1991 Review is not an appropriate test to be applied in the context of the integrated assessment.
7.	p47-48, [3.1(r)-(t)]	The 1991 Review considers heritage to be a guiding design principle for Sullivans Cove. The materials and finishes of the stadium building would not authentically reflect the surrounding built context. The form of the stadium would not correspond with the surrounding urban forms and elements. A new building typology in this area might warrant variation from prevailing forms and materials of surrounding urban fabric. However, the scale of the stadium building is disproportionate, which would exacerbate the discrepancies, and proposed details would not mitigate them.	As the author of the 1991 Review has noted: • "People think of the Cove as a heritage place but it has also been a place of continuous change"; and[17] • "it is this change, together with heritage, layers of experience, innovation, addition and succession, which gives the Cove its richness". The form of the proposed stadium is not intended to correspond with surrounding built form and elements, which represent different aspects of the city's character and history. Consistent with the Draft IAR, recognition that a new typology might warrant variation from prevailing forms and

[17] See SDP, p 52.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			materials, the stadium is designed to differ in its form from, but through its design to be respectful and interpret aspects of, character and history. How this is achieved is explained in the Design Summary and the UDF. Compatibility with the 1991 Review is not an appropriate test to be applied in the context of the integrated assessment.
8.	p48, [3.1(u)]	Indicative landscape treatments shown in the POSS Submission and RFI material are diagrammatic and do not communicate a design solution that could create an authentic connection to the place. The proposed landscape is indicative only and does not appear to respond to the place, history of use or surrounding elements, nor to the nature of its future use, other than for thoroughfare.	The UDF explains the principles informing landscape design, including ensuring that the design demonstrates connection to the place in physical terms and by reference to its Aboriginal and historical heritage. Neither the UDF nor its content in this regard is discussed in the Draft IAR, on which basis the Proponent understands it is not considered by the Commission to present any significant issue.[18] The detailed design of landscaping, and how it ultimately communicates authentic connection, is appropriately a matter for conditions on an approval. Landscaping is described at an appropriate level of detail for the current assessment stage.
Landscape and visual effects			
9.	p49, [3.2(a)]	The size of the stadium would be disproportionate in the context of the small scale of Hobart. The location of the stadium is isolated from the majority of the city's taller buildings, which is at odds with the natural topography and established built-form pattern, and would exacerbate the perceived scale and visual impact of the stadium's scale in the landscape.	The size and scale of the stadium is addressed in items 1, 3, and 5 above. The scale of the stadium is a reason for the project of State significance assessment process, and not a conclusion for the assessment. The scale and form are designed for Hobart and the site.
10.	p49, [3.2(b)]	The built form of the stadium would present an overbearing appearance in the context of the existing built form of the area, which will negatively impact people's spatial experience when moving through the surrounding area and to static views from public spaces and residential areas around the city.	The built form of the stadium is addressed in items 1, 3, 5, 6 and 7 above. The stadium would change the visual environment. This does not make it overbearing. It would appear as a destination in views where it is visible. Impacts to spatial experience are subjective and depend, amongst other things, on a person's perception of the social and cultural value of the

[18] Per the discussion at p 5 of the Draft IAR of what is, and is not, addressed.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			relevant built form. In this case, while the Commission expresses one view, others will consider their spatial experience to be improved.
11.	p49, [3.2(c)-(d)]	The stadium would be highly visible in the areas of primary pedestrian activity in the city, which would have a significant impact on local people and tourists' visual amenity and experience of the place. The proposed roof would increase the height and bulk of the stadium structure significantly, and would increase its visibility above and in contrast to other buildings and landscape features. The main illuminated naming signage attached to the stadium would have a significant visual impact on the surrounding landscape, and would exacerbate the dominating visual presence of the stadium.	Visibility is not inherently negative. The stadium has been designed to respond to its local and broader setting, to maximise positive impacts on visual amenity and experience of the place.
12.	p50, [3.2(f)]	Design details cannot satisfactorily ameliorate the effects of the stadium's built form on the landscape and visual amenity.	Consistent with above responses, visibility does not itself require amelioration.
13.	p50, [3.2(g)]	The form, design, materiality and appearance of the stadium do not warrant it being considered an iconic building as suggested by the Proponent.	The stadium will be uniquely Tasmanian and the 190-metre clear-span structure is understood to be the largest fixed roof over a natural grass oval stadium in the world. This would establish the stadium building as iconic.
14.	p50, [3.2(h)]	The bulk of the stadium immediately adjacent to the headland occupied by the Cenotaph would distort the landscape morphology between the Domain Headlands (Cenotaph) and Battery Point Headland, which should remain visually connected to each other.	The stadium would result in changes to relevant views. The landscape morphology between the Domain headlands and Battery Point will remain visually connected notwithstanding the presence of the stadium.
15.	p50, [3.2(i)]	A Collins Street pedestrian bridge would affect the urban environment.	This is not part of the Project.
Project design			
16.	p51, [3.3(a)]	The size and scale of the stadium would have a significant impact on the visual experience and spatial identity of Sullivans Cove.	The size and scale of the stadium is addressed in items 1, 3, and 5 above.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
17.	p51, [3.3(b)]	Proposed interfaces with the Port area, Timtumili Minanya/Derwent River and the Queens Domain are characterised by a lack of integration or connection.	Integration and connection with surrounding areas are addressed in the UDF. These matters will be subject to further design detail through the production of UDLPs in accordance with proposed conditions.
18.	p51, [3.3(c)]	The height, coarse grain and size of the stadium roof intrude on the identity of the place and the city.	The built form of the stadium is addressed in items 1, 3, 5, 6 and 7 above
19.	p51, [3.3(c)]	The final extent of the roof is unknown, because of uncertainty about structural engineering and design outcomes.	RFI Annexure X submitted 31 January 2025 provides confirmation from consulting structural engineers, on the basis of the detailed structural design, that the roof represents a "well-balanced structural system". RFI Annexures C, D and E submitted 31 January 2025 explains the involvement of other appropriate professionals in the course of design development to ensure what is proposed is feasible. The basis for the Commission's doubt is not explained. In any case, the relevant impacts of a roof in the nature proposed can be assessed on the basis of the material presently available.
20.	p51-52, [3.3(d)-(e)]	The stadium's built form footprint in the context of the size of the site means that the majority of the site's available space is occupied by stadium structure and associated elements. The limited space around the stadium would contribute to movement issues; would make it difficult to create an activated, mixed-use precinct; and would minimise the potential to achieve a public realm area for enjoyment out of event mode. It also means there is very little scope to establish soft landscaping to support amenity and biodiversity.	The physical area compares generously against stadiums around the nation that routinely accommodate crowds much larger than the 25,000-35,000 people that may be expected for events at the stadium. Modelling of pedestrian movement establishes that ample space is available for movement. The UDF demonstrates the potential to achieve a public realm area for enjoyment out of event mode. While the Draft IAR conclusion that the potential for these matters to be achieved is not explained, the Proponent notes the Draft IAR does not refer to the content of the UDF in this respect.
21.	p52, [3.3(f)]	The majority of open areas around the stadium would be overshadowed for much of the time, which would further limit their attractiveness.	The plans include analysis of shadowing on the summer solstice, autumn equinox and winter solstice.[19] They demonstrate that open areas around the stadium will receive sunlight for the majority of the time, because of the orientation and design of the stadium including the roof form.

[19] POSS Submission Appendix A, drawing R-01-A80-0000.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			As explained in the response to RFI item 30 and RFI Annexure C (Sun and Shadowing Fact Sheet) submitted 18 December 2024: • the north-eastern plaza experiences minimal shadowing from the stadium year-round; • the north-western plaza is subject to little shadowing from the stadium or the relocated Goods Shed; • the south-western plaza and Aboriginal Culturally Informed Zone experience no shadowing from midday through the afternoon year-round; • Evans Street experiences some shadowing after midday on the equinox, and throughout the day on the winter solstice (when shadows are at their longest); and • the south-eastern plaza experiences minor shadowing in the morning for most of the year, with shadowing in winter during early morning and late afternoon but good sunlight at midday.
22.	p52, [3.3(f)]	Wind analysis is of a high level and not tested. Wind impacts would be critical to understand for all public spaces.	Assessment against standard wind criteria is described in POSS Submission Appendix O (Wind Comfort Assessment for Visitors and the Precinct Area), with wind tunnel testing reported in RFI Annexure C submitted 4 March 2025. The level of wind analysis is appropriate for the current stage of the assessment process. While wind impacts are critical considerations in the case of all major developments, analysis to date establishes that in most cases, the proposed buildings within the project area result in similar or improved pedestrian comfort conditions compared to not having the buildings. Wind comfort within the stadium is expected to be good.
23.	p52, [3.3(g)]	The proposal for the Goods Shed to be accessible only during events or for dedicated functions is problematic in terms of the surrounding open space, having regard to the design outcome of relocation away from the activity of the Cove and the City, and having regard to movement, visual accessibility, sightlines and Crime	Access to the Goods Shed will be improved as compared with existing circumstances. The Goods Shed will serve as a breakout space during primary events, but may also be used as a bar, open to the public outside primary events. This is outlined in Annexure C of 17 February 2025 which sets out proposed land uses and operating hours.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		Prevention Through Environmental Design (**CPTED**) outcomes.	As explained in section D below, the ability to appreciate and interpret the Goods Shed will also be enhanced. Matters such as CPTED are important considerations. They have informed design to date and are proposed to be addressed through conditions.
24.	p52, [3.3(h)]	The cricket wickets create a major barrier to pedestrian circulation and visibility. The lack of design detail in the plans does not provide an understanding of the edge treatment and presentation of the cricket wicket area and its impact on public space quality.	The integration of the cricket wickets with the public spaces is addressed in the UDF. Design detail, including through the preparation of UDLPs are proposed to be included in conditions of approval which will ensure specific matters such as edge treatments are appropriately addressed.
25.	p52, [3.3(i)]	A stadium would be a new, 'alien' form to some extent in any city context, and this has the potential to add new character and new layers of history and meaning to a city's life and identity. In this case, there is inadequate space at or around the site to mitigate the city-scale negative effects of visual bulk and homogeneity, and the limited public space is inadequate to allow for new, positive contributions to history and meaning to evolve through use and enjoyment.	Responses above regarding the size and scale of the stadium, and regarding change and the difference between change and negative impact, are repeated. The proposition of a "city-scale negative effect of… homogeneity" is not explained in the Draft IAR.
26.	p53, [3.3(j)]	The architecture and urban landscape offer opportunities to mitigate the perceived size of the stadium to a limited extent. These mitigations would not change the dominance of the stadium nor spatial impacts due to dominance on a constrained site.	Responses above regarding the design of the stadium, and regarding change, and the difference between change and negative impact, are repeated.
27.	p53, [3.3(k)]	Detailed drawings are not available for aspects such as landscape plans. This makes it difficult to assess presentation of large, unmitigated paved areas.	Detailed drawings would be required by conditions on an approval. The present stage of assessment is informed by appropriate levels of detail to understand that those detailed drawings are capable of demonstrating an integrated, effective open space outcome consistent with the UDF.
28.	p53, [3.3(l)]	While proposed external architectural façade treatments offer a degree of variation and articulation, this is inadequate to mitigate the negative urban design impacts posed by the size and bulk of the stadium in the context of the site size and constraints. More detailed landscape proposals might demonstrate improvements	The acknowledgment of variation and articulation through façade treatments is noted. These are accompanied, in design terms, by measures including low wall heights and roof strike point, which will be more relevant to perception of scale.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		to localised public realm outcomes in areas around the structure, but these could not mitigate larger spatial impacts that flow from the stadium's size.	The acknowledgement of the ability of detailed landscape proposals to demonstrate improvements to localised public realm outcomes is acknowledged. Landscape plans are not proposed to mitigate the stadium's appearance in longer views.
Signage			
29.	p54, [3.4(a)]	Details of signage are limited, and signage is not presented as part of an integrated landscape solution.	Details of signage are appropriately dealt with by condition. For the purposes of the present assessment stage, the material presented including particularly the VIAR and POSS Submission Appendix Z (Signs) is appropriate for the present assessment stage. As Appendix Z explains, signage is kept to a minimum, and is proposed to be integrated with the stadium and the landscaping (see generally section 9.1.2).
30.	p54, [3.4(b)]	The corner location near Davey Street, Macquarie Street, Brooker Avenue and Tasman Highway has very high visual exposure, and details of the main naming signage in this location should be considered carefully.	Noted.
31.	p54, [3.4(c)]	The main stadium signage would be prominent in the surrounding landscape, due to its scale, location and illumination. The presence of large naming signage would exacerbate the visual impact of the stadium building.	Appendix Z explains the design and approach to naming signage, including its integration with the stadium façade, use of lowest-illumination options, and exploration of potential for LED screens to enable a 'clean stadium' mode if switched off.
32.	p54, [3.4(d)]	Viewing distance for the main naming signs would. Be significantly greater than the 50m indicated at p 195 of RFI Annexure C provided on 17 February 2025.	Agreed. The reference to 50m in Annexure C is the minimum required viewing distance, consistent with Appendix Z, p 13.
33.	p54, [3.4(e)]	The large naming signs do not accord with the scale and details of adjacent and nearby heritage buildings. This adds to the effect of the stadium building dwarfing surrounding heritage buildings, including the Royal Engineers Building.	As the signs are properly integrated with the stadium façade, there is no need for them to be separately designed to accord with the scale and details of nearby buildings, or to be considered in isolation to the appearance of the stadium as a whole. Heritage impacts are addressed in section D below.
34.	p54, [3.4(e)]	The 20m length of the proposed main sign is similar to or significantly greater than the height of adjacent buildings,	Comparing the length of sign display areas to height of buildings is not an appropriate basis to inform conclusions regarding size of signage. The

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		and does not reflect the prevailing urban form, grain and scale.	visual impact of signage is a relevant consideration, and relevantly addressed through design considerations; considering how signage reflects urban form and grain is less helpful. Visual impact of signage must be considered having regard to the signs' relationships with the host building, which is a significant factor in their prominence and appearance in the urban form.
35.	p54, [3.4(f)]	Given the scale, height and visibility of the stadium building itself, the naming signage would have little or no value for users of the stadium from a way/place finding or activity/building identification perspective. From this perspective, the main naming signage is not a functionally necessary part of the Project.	The signage forms part of the Project and is proposed consistent with requirements for stadium operations. While the role of the stadium itself as a 'sign' is acknowledged (see Appendix Z, p 4) this does not diminish the role of naming signage from an identification perspective, or to assist in near-scale wayfinding.
36.	p54-55, [3.4(f)]	Naming signage would essentially represent third-party advertising (advertising a product or brand that is not associated with the function of the building, such as a 'billboard'). This type of signage has traditionally been tightly controlled in Hobart. A naming sign with a direct connection to the place could result in a more meaningful outcome.	Noted.
37.	p55, [3.4(h)]	The gate signs would not have a significant impact on the surrounding buildings or landscape, but their detail should be resolved and integrated with a landscape proposal.	Noted, and could be appropriately dealt with by conditions.
38.	p55, [3.4(i)]	The sign design should be integrated into the design of the stadium, the surrounding landscape and the sense of place. The signs should be responsive to the context of the surrounding area, rather than the building they are attached to.	The proposed signs are intended to respond to both the context of the surrounding area, and – as the first sentence of this paragraph of the Draft IAR suggests– the host building (stadium).
39.	p55, [3.4(i)]	The preferred option should present LED signs for the main sign and the totem signs that can be turned off when the stadium is not in use.	This is consistent with the information provided in Appendix Z, including in respect of the potential for LED screens to be used for main signs to allow a 'clean stadium' mode when signs are switched off (p 13).

Other matters not considered in Draft IAR

23. The Draft IAR does not address the Mac Point Precinct Plan or the SDP for the Project Site.

24. The Draft IAR does not recognise any benefit associated with the development of the Mac Point Precinct including the delivery of open space and the relocated Goods Shed as part of the Project. This is a substantial benefit of the Project, by reference to the existing condition of the Project Site and its exclusion to the public.

25. The Draft IAR does not address the size and form of the stadium as a function of its role in providing social and community space, events and benefit. This must be taken into account in the consideration of acceptability of visual impacts.

26. The Draft IAR does not address benefits arising from particular design choices and approaches for the stadium, including:

    (a) the design of the stadium walls and roof to minimise scale at the building's edges to a scale consonant with the height of adjacent heritage fabric;

    (b) the associated reduction of potential for visual impacts;

    (c) the roof structure providing for internally held lights, rather than light towers which would result in greater visual impact and light spill;

    (d) the form of the roof reducing shadowing impacts; and

    (e) the presence of the roof as a positive measure reducing noise and lighting.

27. While the Draft IAR acknowledges that the proposed stadium "has the potential to add new character and new layers of history and meaning to a city's life and identity",[20] it does not identify positive issues arising from this potential, or consider how the Project is successful in achieving associated benefits, in land use planning or urban form terms.

28. In particular, the Draft IAR does not address positive aspects of the Urban Design Framework, including:

    (a) its strategies relevant to revealing the pre-settlement shoreline and the original flow of the Rivulet;

    (b) the integration and acknowledgment of Aboriginal cultural history and values through design and opportunities for Aboriginal contributions to the design and use of public open space.[21]

[20] Draft IAR, p 52.
[21] UDF, p 7.

29. The Draft IAR does not consider urban renewal and city shaping benefits associated with the Project, or its impact as a catalyst in respect of transport corridors and housing and development opportunities, notwithstanding the identification of these and other benefits in the submission of the Department of State Growth (**DSG**) under section 21 of the SPP Act dated 24 October 2024.

D. Historic cultural heritage

Summary and key facts

30. The design of the Project has been conceived and refined with continuing attention to the heritage sensitivity of the surrounding area. This has been informed by comprehensive assessments which address all issues raised in the Draft IAR (and others).

31. Positive impacts include enhancing the ability of the public to appreciate and enjoy heritage places (particularly the Goods Shed) through adaptive reuse and, in due course, integration into the Mac Point precinct.

32. Where the Project would result in unavoidable heritage impacts, these would be mitigated and offset to the extent possible through the design phase, including having regard to general and specific management measures for particular places proposed in the POSS Submission material.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p56, [4.1]	The built form and the use of the stadium would have a significant detrimental effect on the visual amenity and historical cultural heritage and community values of the Cenotaph, by reference to the "dominating physical presence of the proposed [stadium], along with associated elements of its use such as noise, lighting and patron activity", and on views from and towards the Cenotaph.	The stadium will obstruct parts of views of the Cenotaph's open setting, framed by the vegetated escarpment, from some vantage points. However, the effects of change are mitigated by the solid built edges of the stadium being at a similar scale to other buildings nearby, and the transparent dome-like form of the roof structure. This could be further mitigated through landscape planting on the escarpment edge, reducing the overall impact on the views. The Project will create new views from the public domain to the Cenotaph which presently do not exist, specifically from Evans Street through the stadium structure from the south-east plaza (as down in Summary Report at figure 2-24 p 55), within the Project Site (which is not currently public accessible) and from within locations within the stadium and Goods Shed.[22] This impact is identified and addressed in POSS Submission Appendix L – Historic Cultural Heritage Impact Assessment (**HIA**).[23]

[22] See discussion in Summary Report section 2.7, p 52.

[23] The HIA was supplemented by RFI Annexure E provided on 17 February 2025, which provided reorganised information in support of the original assessments of the HIA, and confirmed that further information in respect of visual impacts does not affect those assessments.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			While the impact cannot be wholly avoided, specific and general heritage management measures are proposed for the Cenotaph, together with measures to offset the impact.[24] Responses to general measures are provided in the Summary Report, at p 142. A full study of visual impact associated with the Cenotaph is provided in POSS Submission Appendix J (Visual Impact Assessment Report), as supplemented by RFI Annexures K and L provided 31 January 2025. Visual impact is discussed in section C above, and in the Summary Report, at p 54. It is noted that the suggestion that lighting, noise and patron activity associated with events held at a stadium are inconsistent with the Cenotaph, does not reflect the current use of other areas in closer proximity to the Cenotaph, including the Regatta Grounds. These areas are currently used for a range of events including agricultural shows, circuses, regattas, car parking and music events.
2.	p59, [4.2]	The visual impact of the stadium would have a significant effect on the sense of openness of the southern Domain area and views to the surrounding landscape.	As noted above, the transparent dome-like form of the stadium roof structure and maintaining the built edges of the stadium being at a similar scale to other buildings nearby, minimise this impact. While the impact cannot be wholly avoided, the HIA provided as part of the POSS Submission outlines mitigation measures as relevant to the southern Domain area, together with measures to offset the impact.[25] Visual impact is addressed in **section C** above.
3.	p60-61, [4.3.1(a)]	The built form of the stadium would have significant negative impacts on the setting of the heritage-listed Henry Jones & Co. IXL jam factory buildings.	As noted above, the transparent dome-like form of the stadium roof structure and maintaining the built edges of the stadium being at a similar scale to other buildings nearby, minimise this impact. This impact is identified and addressed in the HIA. While the impact cannot be wholly avoided, the HIA provided as part of the POSS Submission outlines specific and general mitigation measures are proposed around cladding, together with measures to offset the impact.[26]

[24] HIA, p 77.
[25] HIA, p 176.
[26] HIA, pp 97-98.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
4.	p61, [4.3.1(b)]	The built form of the stadium would have significant negative impacts on the setting and appreciation of the Royal Engineers Building.	As noted above, the transparent dome-like form of the stadium roof structure and maintaining the built edges of the stadium being at a similar scale to other buildings nearby, minimise this impact. This impact is identified and addressed in the HIA. While the impact cannot be wholly avoided, the HIA provided as part of the POSS Submission outlines specific and general mitigation measures are proposed for the Royal Engineers Building, together with measures to offset the impact.[27] It is noted that the Royal Engineers Building is surrounded by a protected yard space and the Proponent has invested in the recent external restoration to stonework to continue protect the heritage values of the building.
5.	p61-62, [4.3.1(c)]	The built form of the stadium would have a moderate effect on the historical cultural heritage significance of Victoria and Constitution Docks.	As noted above, the transparent dome-like form of the stadium roof structure and maintaining the built edges of the stadium being at a similar scale to other buildings nearby, minimise this impact. While the impact cannot be wholly avoided, the HIA provided as part of the POSS Submission outlines specific and general management measures are proposed for the Victoria Dock and Constitution Dock, together with measures to offset the impact.[28]
6.	p57, [4.1(e)]; p 62, [4.3.1(d)-(e)]	The impacts referred to above cannot be resolved, mitigated or managed through design of the stadium.	In addition to the mitigation measures noted for each item above, the HIA also outlines offset mitigation measures, including through its recommendations for: • a program of interpretation of heritage places (and indigenous values) within the boundary and immediate surroundings of the Project; • a drawn and photographic recording of impacted heritage places prior to construction preparation commencing. This is to extend to the Hydro Electric Commission building fronting Evans Street; • construction management plans that protect heritage places during construction;

[27] HIA, pp 123-124.
[28] HIA, pp 154-155.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			• vibration monitoring on nearby unreinforced masonry heritage buildings or features (such as the Hobart Rivulet diversion tunnel); • locating building services, plant and equipment to limit visual impact; and • adaptive re-use/refit guidelines for the Goods Shed and Red Shed. [29] These recommendations are proposed to be implemented in accordance with appropriate conditions.
7.	p57, [4.1(e)]	The impacts referred to above in respect of the Cenotaph cannot be resolved by scheduling of stadium events to avoid specific ceremonial activities at the Cenotaph.	Scheduling of events would be dealt with through the Events Management Plan required by proposed conditions. As proposed, the Events Management Plan would be required to include a communications protocol for key stakeholders. Concurrent scheduling of major events at the Cenotaph and the stadium would be unlikely. There is no realistic possibility of conflict during primary occasions such as ANZAC Day. In addition to scheduling, the above sections respond to the individual concerns raised. It is also noted above that scheduled and planned large-scale event-based activity is consistent the existing use of areas surrounding the Cenotaph.
8.	p62, [4.3.2(a)]	The dismantling and removal of the Red Shed from the Project Site would not unreasonably affect the cultural heritage significance of the building or of the site.	This is agreed. However, notwithstanding this conclusion, specific and general management measures are proposed for the Red Shed, including in respect of its dismantling and relocation or storage.[30]
9.	p63, [4.3.2(b)]	If the Red Shed: • is re-erected, an appropriate location for on-going use and activation should be considered; or • is stored, its storage should be in accordance with recommendations of Heritage Tasmania, and opportunities should be explored for integration of	These are consistent with specific management measures recommended by the HIA.[31]

[29] HIA, pp 154-155.
[30] HIA, pp 159-160.
[31] HIA, pp 159-160.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		interpretative material in the urban realm and landscape design.	
10.	p63, [4.3.2(c)-(d), (h)]	The proposed relocation of and alterations to the Goods Shed would have negative effects on the values and experience of that building. However, having regard to its cultural heritage significance, this is not an issue of critical significance for the Project.	This impact is identified and addressed in the HIA. Specific and general management measures are proposed for the Goods Shed, together with measures to offset the impact.[32] As noted in the HIA and supported by reported comments of staff of Heritage Tasmania,[33] the retention, relocation and activation of the Goods Shed as part of the Project provides an opportunity to enhance public use and a greater awareness of the place.[34] The nature of the Goods Shed means it is capable of withstanding impacts associated with the visual impact of the stadium.[35]
11.	p63, [4.3.2(h)]	The relocated Goods Shed should be integrated with the design proposal for the broader Mac Point site to maximise the opportunity for its value to be understood and enjoyed through use and access.	The HIA recommends the preparation of adaptive re-use/refit guidelines for the Goods Shed.[36] Consistent with the Mac Point Precinct Plan, it would be integrated with, and support land use consistent with, the broader Mac Point Precinct.
12.	p65, [4.3.3(a)-(d)]	The Project site has been subject to a considerable number of historical archaeological assessments, and has no or low historical archaeological sensitivity.	This is consistent with the POSS Submission and RFI Material.
13.	p65, [4.3.3(d)]	It is appropriate that a "watching brief" for historic archaeological elements is kept during construction within a specific area of the Project Site that may include remnant elements of mid-nineteenth century maritime infrastructure.	This is consistent with the unanticipated discovery plan recommended by POSS Submission Appendix M (Historical Archaeological Assessment Sensitivity Report and Method Statement) (**HAA**) for implementation during excavations. The unanticipated discovery plan would be required as part of the Construction Environmental Management Plan (**CEMP**) required by proposed conditions.

[32] HIA, p 111.
[33] Draft IAR, p 64.
[34] HIA, p 110.
[35] Draft IAR, p 64.
[36] HIA, p 111.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
14.	p65-66, [4.3.3(e)-(k)]	There is potential for impacts to historic archaeological values in areas which have not yet been subject to historical archaeological assessments for the purposes of the Project.	Any potential impacts would be addressed through new archaeological assessments. However, point 12 above is noted. It would be appropriate for the unanticipated discovery plan required as part of the CEMP to include any extent of excavation/disturbance associated with the Project in any area which has not been the subject of specific historical archaeological assessment to date (i.e., any excavation/disturbance associated with the cricket wickets and areas of landscaping referred to in Draft IAR paragraph 4.3.3(f)).

Other matters not considered in Draft IAR

33. The Draft IAR does not address the full range of potential impacts assessed in the HIA and HAA, or their assessment and conclusions as to their acceptability.

34. As noted in the responses above, specific mitigation and management recommendations are set out in the HIA. This are not referenced or considered in the Draft IAR, either in respect of the places specifically identified above, or in respect of:

    (a) 41 Hunter Street (UTAS Centre for the Arts, formerly part of H. Jones & Co.);[37]

    (b) Anzac Parade, and Queen's Battery;[38] and

    (c) Regatta Point Activity Area.[39]

35. The Draft IAR does not identify the aspects of Project design with positive consequences in heritage terms, including the design features identified at item 1 of the table above, and the avoidance of any overshadowing on the Cenotaph at any time which ensures uninterrupted sunrises and sunsets during commemorative events.

36. It does not engage with benefits such as the opportunity for the design of the urban realm to reflect the history of the site and its surrounds (as described in the UDF), or the enhancement of public use and interpretation of the Goods Shed and its values, notwithstanding the advice from Heritage Tasmania referred to in item 10 of the table above in this respect.

[37] HIA, p 69.
[38] HIA, p 77.
[39] HIA, p 195.

E. Aboriginal cultural heritage

Summary and key facts

37. Aboriginal cultural heritage can be spoken to by Aboriginal people alone. The Proponent is committed to ongoing consultation with Aboriginal people over the course of the Project, and the development of associated spaces in the Precinct such as the Aboriginal Culturally Informed Zone, in recognition of its importance.

38. The material prepared in support of the application includes robust archaeological investigations. On the basis of those investigations there can be confidence that impacts can be managed as proposed in the POSS Submission.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p67, [5.0 (Summary)]	Only Aboriginal people can truly speak to and understand the Aboriginal cultural and landscape values of the place.	Agreed.
2.	p67, [5.1(a)]	There have been a considerable number of Aboriginal Heritage assessments undertaken within the main body of the Macquarie Point site and the surrounding area, albeit piecemeal and project specific in nature.	Noted. Aboriginal cultural heritage investigations undertaken within the Project Site and in its vicinity are reported in the following reports which have been supplied. • Draft Macquarie Point Multipurpose Stadium Project of State Significance – Pre-Stadium Cultural and Landscape Values Assessment (AHA690) prepared by Southern Archaeology, Colin Hughes, Caleb Pedder and Sarah Wilcox (dated: 28 August 2024) (**Draft CLVA**); • Draft Proposed Multi-Use Stadium at Macquarie Point, lutruwita (Tasmania) Aboriginal Heritage Assessment Report (AHAR) (30 January 2025) and prepared by Southern Archaeology, Colin Hughes and Caleb Pedder; and • Appendix M Macquarie Point Stadium Historical Archaeological Sensitivity Report and Archaeological Method Statement. In addition to consulting with the Aboriginal community regarding individual permit applications or unanticipated discoveries, the Proponent has also undertaken consultation with community on the development of the Project and the Aboriginal Culturally Informed Zone. A copy of the letter and report

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			outlining the engagement, which was provided on 31 January 2025, within the timeframe outlined for requested further information to be considered in the assessment.
3.	p67, [5.1(c)]	The predictive model, mapping and classification of Potential Areas of Sensitivity for Aboriginal heritage material presented in the AHAR are based on a combination of evidence and sound professional judgment.	Noted. This means there is a reliable basis for potential impacts to be identified.
4.	p68, [5.2(d)-(e)]	A 'highly sensitive' potential area of sensitivity is located outside the proposed Project site, but within an area considered by the Commission to be within the scope of the project.	This area does not include any works or land use within the scope of the Project.
5.	p69, [5.2(d)]	An assessment of the landscape character and values and the effect the project may have on these values was not provided. Consequently, until feedback is provided through engagement and assessment by the Aboriginal community, the Commission is unable to make findings on these issues at this stage.	A draft cultural landscape assessment was provided on 17 September 2024 (Appendix HH - Pre-Stadium Cultural and Landscape Values Assessment - Southern Archaeological) (**Draft CLVA**). Refer to sections 15 and 16 of the Draft CLVA which provides an assessment, consideration and recommendations. Aboriginal community feedback has been sought on the draft report. The Proponent will continue to engage with community.
6.	p69, [5.2(c)]	In order to understand the effect the Project may have on cultural landscape values, information is needed in relation to the characteristic attributes of the place. This encompasses peoples experience of association with and perceptions of the place.	Agreed. This is reflected in the Draft CLVA.
7.	p70, [5.2(f)]	Many of the observations and suggestions made in the *Appendix HH - Pre-Stadium Cultural and Landscape Values Assessment - Southern Archaeological* on how to approach and undertake a landscape values assessment appear to be sound and applicable to the Project.	Noted.
8.	p70, [5.2(g)]	The assessment of landscape character and values and the effects that the Project may have on those values	Agreed. The comments above regarding consultation are repeated.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		must be based on and informed by the Aboriginal community.	

Other matters not considered in Draft IAR

39. The consultation report and letter outlining engagement with the community provided 31 January 2025 as further information, requested by the Panel and provided in the timeframe required, does not appear to have been considered. Neither does the Pre-Stadium Cultural and Landscape Values Assessment - Southern Archaeological provided which was co-authored by Aboriginal people.

40. The Draft IAR does not address measures to be implemented through construction of the Project in respect of impacts and their mitigation and management, as would be required by conditions and including as recommended in the POSS Submission Appendix M (Macquarie Point Stadium Historical Archaeological Sensitivity Report and Archaeological Method Statement and the Draft CLVA.

F. Use and activity

Summary and key facts

41. The Project represents substantial positive change in land use planning terms: the conversion of an underutilised, brownfield site, to land use focused on social and community outcomes.

42. This is an outcome which takes the highest advantage of:

    (a) the locational characteristics of the Project Site including:

        (i) its proximity to the economic activity of the CBD, which enables uplift through event-related spending in the CBD, and maximises the accessibility of the stadium to members of the local and broader communities;

        (ii) the connection via the Project Site of the CBD to the green heart of the city on the Queen's Domain, the Hobart Cenotaph and to the intercity cycleway and Tasman Bridge;

        (iii) the accessibility it offers to current and future sustainable travel options;

    (b) its access to services infrastructure such as sewerage, water and electricity which, in the context of a project of this nature, is significant of itself and will help avoid additional works and associated impacts.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p71, [6.0]	Overall, the Panel finds that the limited space around the stadium is a major constraint in developing a genuinely active mixed-use precinct. The spaces around the stadium are constrained, visually disconnected, not easily accessible, overshadowed, and potentially subject to uncomfortable wind conditions. During operation, most space around the stadium would be required for access and egress, with limited or no scope for successful activation through other uses.	The Project to be considered is a multipurpose stadium as contained in the Ministerial Order dated 16 October 2023. It is not to consider another form of use, including a use which could be described as a 'genuinely active mixed-use precinct.' This, however, is being delivered as part of the broader precinct which is noted below. The Ministerial Direction does direct the Commission to consider the extent to which the Project is consistent with and supports the urban renewal of the Macquarie point site, as provided for in the Mac Point Precinct Plan. The Mac Point Precinct Plan guides future development of the Precinct in a manner that is consistent with, and complementary to, the use of the land for the purposes of a stadium. The Precinct Plan was developed prior to the stadium design and has been led by the site and surrounding

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			environment. This work found that there was capacity and space to support the stadium development, alongside the other priorities for the site. This includes the stadium being part of an activated, mixed-use precinct. Given the lack of prior development, the Macquarie Point precinct is a highly strategic public land resource which has been earmarked for land use and development transformation under specific legislation (MPDC Act). A worthy outcome for this precinct would see it developed and enjoyed so far as possible as a public asset and as a destination to be widely experienced for generations to come. Matters such as accessibility, overshadowing and wind have been carefully considered, are part of the Precinct design, support the achievement of a mixed user broader precinct, and are dealt with in other parts of this **Representation 3**.
2.	p71, [6.0]	The Panel considers that, during construction and during stadium events, the Project has the potential for adverse effects on the operation of the Port of Hobart, Federation Concert Hall, the Queens Domain and surrounding uses, such as hotels and educational facilities, established events, and hospitals, due primarily to increased traffic and parking demand and noise. Pedestrian movement and circulation around the area would also be compromised.	It is acknowledged that the Project has the potential to have effects (both positive and negative) on the operation of the Port of Hobart, Federation Concert Hall, the Queens Domain and surrounding uses, such as hotels and educational facilities, established events, and hospitals. However, this impacts can be largely managed, mitigated and offset as set out in the POSS Submission. The matters raised, including traffic, parking and noise, are addressed in other parts of this **Representation 3**.
3.	p71, [6.1(b)]	The evolution of the activities across the precinct has been consistent with the principles for land and maritime activities and expressed in the Sullivans Cove Planning Review 1991. Many of these principles have merit and provide a sound basis for considering how the Project relates to the site, the precinct, and the city.	The 1991 Review, and its relevance to the integrated assessment of the Project, is addressed in **section C** above. It is noted that these comment relate to areas outside of the Project Scope.
4.	p17 & 73 [6.1(g)]	The Panel considers that while the stadium would generate periods of very intensive energy and activity, the built and public spaces the Project provides are likely to be largely dormant outside of event mode. Based on an estimate of 35 to 40 events per year, for most of a year, 73 the use of the site would be for purposes	This does not reflect the latest information provided to the Commission on land uses and operative hours, provided in Annexure F - Planning Report 31 January 2025. This proposes the following uses: • Business and Professional Services; • General Retail;

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		associated with hosting private functions such as conferences or exhibitions. A relatively small area of the stadium complex and site is used for these purposes. The level of activity related to this type of land use would also be determined by commercial factors.	• Food Services; • Hotel Industry (bars); • Community Meeting & Entertainment; • Passive Recreation; and • A range of other integrated/subservient activities.
5.	p73, [6.1(h)]	The functional and spatial requirements of the stadium result in the majority of the Macquarie Point site being occupied by the stadium building. This would significantly affect areas within the site that were identified in the 2019-2030 Reset Plan as being suitable for mixed use purposes (commercial/residential/visitor accommodation).	The 2019-2030 Reset Plan has no continuing purpose or relevance to the Project Site. It has been superseded by later events and planning, including the 2024 Precinct Plan and the SDP.
6.	p73, [6.1(hi)]	The Panel considers the residual areas of the Macquarie Point site, outside of the land required for the stadium and adjoining structures: • are insufficient in area to enable an effective amount and range of other urban/mixed land use activities; • have the potential to generate land use conflict with current and future port and shipping operations where future activities expect a high level of amenity; and • include land that is dislocated from urban services and neighbourhoods.	The Proponent does not agree with these assertions and considers that they are not supported by the facts and evidence that are available. Please note the comment under item 1 and refer to the 2024 Precinct Plan, and information provided in the Transport section.
7.	p73, [6.1(m)]	The Panel considers the northern area of the site, including the area containing the relocated Goods Shed, is physically isolated, visually disconnected and not related to a use to the north that would attract or generate pedestrian activity outside of event mode. Consequently, passive surveillance of this area is likely to be poor and people may not feel safe. In addition, the space is narrow and constrained.	These assertions are not reflective of the Proponent's views or the design intent for the Project. There is no, or very little, objective evidence that has been provided to support these assertions.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
8.	p74, [6.1(o), (p)]	The Panel considers the overshadowing effects of the Stadium building, and particularly wind effects, are important factors in considering how the western space could be designed to be an attractive space for people to sit, dwell and occupy. The wind analysis provided by the Proponent (Annexure C, provided as further information on 4 March 2025) categorises five classes of wind quality for pedestrian comfort. The wind comfort classes assess quality 1 wind as being good for sitting, quality 2 wind as being moderate for sitting and qualities 3-5 being poor for sitting. The area around the south of the western space near Gate 2 is quality 3 wind, which is assessed as being good for traversing and poor for sitting. While the Panel does not have access to the information associated with wind comfort across the site of the Project, it appears that the western area may not be a suitable or ideal area for people to sit or dwell and this may diminish the capacity of this area to be designed to reflect Aboriginal community cultural values.	These matters are addressed in **section C** above. Comments related to wind effects are addressed in **section H6** below. The capacity of the Project area to be designed to be attractive for public access, and to reflect Aboriginal community cultural values, is addressed including in the UDF. The site currently has no such capacity.
9.	p75, [6.2.1(a)-(d)]	The Port of Hobart's key functions at Macquarie Wharf are focused on accommodating cruise ships, providing for general freight such as bulk log exports, and shipping activities associated with Antarctica and the Southern Ocean. The current traffic and parking arrangements for coaches and other vehicles to pick up and drop off cruise ship passengers adjacent to or near by the cruise terminal is likely to be either limited or not practicable during peak pedestrian movement periods associated with events at the stadium.	The POSS Summary Report explains at page 181 that whilst there may be overlap between the departure of cruise ships and some events at the statement, the potential movement related conflicts can be managed through a tailored traffic management plan. TasPorts accepts this approach based on the position set out in its letter to the Commission dated 23 October 2024. The Proponent will work with TasPorts and cruise ship operators in the development of the management plan.
10.	p75, [6.2.1(e)]	There is no basis for the Panel to assess whether suitable access can be provided, based on the information provided.	The provision of suitable access is a matter that can be appropriately managed through an events management plan, and in consultation with relevant stakeholders (i.e., in this context, TasPorts). TasPorts accepts this approach, as set out in its letter to the Commission dated 23 October 2024.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
11.	p77-78, [6.2.2]	The operation of the stadium would result in sound, including sound with special characteristics, that may affect the Federation Concert Hall and specifically the operation of the Tasmania Symphony Orchestra that uses these facilities. There is no evidence that the Federation Concert Hall has sound-proofing in place.	As set out in the Noise and Vibration Assessment prepared by AECOM (21 August 2024) (Appendix Q to the PoSS submission) and the Noise Assessment Supplementary Report prepared by AECOM (Annexure Q to the RFI response submitted on 31 January 2025), the construction and operational noise impact associated with the Project are capable of being acceptably managed, including in relation to the Federation Hall. Refer to response in row 1 of the issues identified in the Draft IAR relating to noise in **section H4**.
12.	p79-81, [6.2.3]	The Draft IAR considers that the Queens Domain is likely to be a popular location for parking on event days and that this may affect parking availability for other formal activities within the area, including the Doone Kennedy Aquatic Centre, the tennis and athletics centre and the Royal Botanic Gardens.	Section 5.2 of the Transport Study recognises that there may be some overlap in demand for car spaces within Queens Domain for existing activities within the area and events at the stadium. However, Queens Domain is not identified to support stadium parking. Management measures can be used to ensure parking restrictions are satisfied.
13.	p81, [6.2.4]	Existing uses in Evans Street and Hunter Street are likely to be particularly affected by both the construction and operation of the stadium, due to their physical proximity and access requirements.	Refer to response to transport related issues in section 6 below.
14.	p82, [6.2.4]	There are noise sensitive receptors close to the stadium, including University of Tasmania facilities, hotels and apartments.	Refer to response to noise and vibration related issued raised in the Draft IAR. The University of Tasmania in its letter dated 8 November 2024 anticipates that the construction and operational impact require close management. The Proponent agrees. These are matters that are appropriately dealt with through the CEMP and OEMP, as required by the Proponent's draft conditions.

<u>Other matters not considered in Draft IAR</u>

43. The Draft IAR focuses on potential improvements to conceptual information provided in the POSS Submission and in response to RFI items. It does not address the land use benefits associated with a stadium in this location, being so proximate to activity and services, and highly accessible, or to the benefits associated with other land uses including commercial and public spaces. As the POSS Submission notes:

(a) the site connects the CBD to the green heart of the city on the Queen's Domain, the Hobart Cenotaph and to the intercity cycleway and Tasman Bridge;

(b) the CBD location significantly contributes to what can be a sustainable event travel plan. The location is uniquely beneficial by virtue of its proximity to existing public transport services and car parking, as well as bars, cafes and restaurants that will assist by flattening the spectator egress profile;

(c) this proximity also contributes to the economic uplift modelled due to event-related spending in the CBD; and

(d) the strategic placement in the Hobart CBD enables the stadium to catalyse transport investment in the State, a fundamental aspect of liveability.

44. The Draft IAR does not engage with benefits of locating the stadium at the Project Site in transport and servicing terms (noting existing access to sewerage, water and electricity), which include but are not limited to avoiding the need for more substantial works. These benefits are addressed in the POSS Summary Report (primarily pp 13, 105, 130-131, 203-207), and in Appendices N (*Transport Study*) and BB (*Services Report – Infrastructure Strategy*).

45. The Draft IAR does not appear to have regard to information provided in response to the Commission's RFI on 31 January 2025 in respect of the use of proposed spaces and their potential uses.

46. In addition to the matters outlined above, the Draft IAR does not:

(a) consider the benefits resulting from the Project, including increased patronage at businesses surrounding the Project Site once the stadium is operational; and

(b) acknowledge that there are benefits to siting the stadium on the Project Site in terms of access to existing infrastructure.

G. Transport and movement

Summary and key facts

47. As demonstrated by the POSS Submission and RFI Material, the Project has been designed to:

    (a) accommodate people arriving by active and public transport;

    (b) accommodate people arriving by private vehicles;

    (c) allow for service vehicle access needs to public and operational areas including, the full circumference around the exterior of the stadium and underneath the stadium to operational and secure areas;

    (d) planning for movement in emergencies; and

    (e) consider and address potential impacts on the broader transport network.

48. The design of the stadium provides adequate space and well resolved environments for pedestrian movement before and after events, and while no event is occurring. Direct and substantial attention is given to planning for emergency scenarios including the extraordinary circumstance of a total evacuation, including through design and modelling demonstrating that there are no 'pinch points' or other restrictions stopping relevant standards being met.

49. For a project of State significance, it is appropriate for mode-share target to be based on travel behaviour at other events and seek to encourage behaviour change, while planning for a range of choices through a sustainable transport plan. As demonstrated in the application material, the targets are realistic, based on travel behaviour and effective models implemented for other events and stadia and present an acceptable movement outcome will result, with tolerances even if the targets are not met.

50. As is usual with new major projects, the detailed design process will determine the final physical movement elements of development as well as how people will move to and from the space within the established transport network. It is appropriate that traffic management measures for construction and operation are secured through conditions as proposed in Appendix 2.0 of the POSS Summary Report.

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p85-86 [7.1.1(a), (c)-(f)]	The Draft IAR raises concerns regarding pedestrian movement for patrons and the community, particularly post-event pedestrian movement relating to the safety	The basis for the design of Project and its integration with the transport network for and beyond the Precinct is explained in submission material including Appendix N - Transport Study August 2024) (**Transport Study**)

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		capacity and convenience of pedestrian movement options. The Draft IAR expresses concern that the that management actions would not provide a feasible alternative to suitable permanent pedestrian infrastructure.	and Annexure P - WSP transport and movement matters (31 January 2025). As the latter document explains, design and planning has been carried out to a level of resolution appropriate for the present assessment. It does not attempt to represent event transport plans that will be developed working with the operator and provide more specific details about operations. It is expected that this will be delivered as a condition of approval and will be developed in consultation with DSG, emergency services and Hobart City Council. The current design and modelling have enabled testing of various scenarios, which demonstrate that transport operations as proposed can be implemented from the commencement of operation. It is appropriate for management of potential interactions between pedestrian and vehicle movements to be addressed in the preparation of the Operational Environment Management Plan (**OEMP**) and its sub-plans, as is proposed in the Appendix CC - Emergency Management and Incident Response report (August 2024) (**EMIR Report**) and would be required by conditions. This will also consider the various scale of events, noting a number of smaller events and activities at the stadium are likely to require little to no specific transport management or planning.
2.	p85 [7.1.1(b), (i), (j)-(l)]	The Project should include *'all necessary pedestrian infrastructure and management arrangements that would enable pedestrians to move to and from the stadium in a safe and convenient manner, including beyond the 86 immediate area of the stadium'*	As explained in **Representation 2**, some pedestrian infrastructure and management arrangements, like the Collins Street bridge, extend beyond the scope of the Project. These elements are subject to separate processes for assessment, approval and delivery.
3.	p87, [7.1.1 (g)-(h)]	The operation of the stadium should not require full or partial closure of the road network.	As explained in the Transport Study, it is common for stadia around Australia to implement short term event management measures in the local network surrounding a stadium. It is not unreasonable to expect some traffic management measures to allow for the safe and efficient operation of events at a stadium, which of significance to the state. Such measures are temporary in nature and would be implemented only where necessary. Furthermore, the Transport Study provides that common event times do not generally coincide with peak traffic volumes. It is noted that some disruption to traffic to support

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			events is consistent with the existing arrangements in the city, with traffic management used to support events throughout the city. It should also be noted that large events with over 20,000 attendees are expected to occur approximately 8 times a year. It is acknowledged that any road closures that are ultimately part of the operational traffic management would require the approval of the relevant road authority, as is the case for other events that occur in the city and other places.
4.	p90-93, [7.1.2]	The Draft IAR states that it has not been demonstrated how sufficient space for pedestrian evacuation pathways and emergency vehicle routes would be provided.	Emergency evacuation is proposed to be provided for in accordance with international standards for safety at sport venues, as outlined in the *Guide to Safety at Sports Grounds – Sixth Edition*.[40] The EMIR Report identifies how this can be achieved on the basis of the proposed design. A draft Emergency Management Plan (**EMP**) has been prepared but as explained in the EMIR Report it has not been publicly released as it has regard to sensitive security matters. Emergency measures are appropriately finalised and implemented through an emergency management plan, which is a requirement of the draft condition in Appendix 2.0 of the POSS Summary Report. Modelling that has already been completed shows that there is sufficient egress in the event of an emergency. This includes noting the location of the gates, which are based in the north-east, south-east, south-west and north-west corners and close to entry and exit points for the site, and the movement within the stadium. The Emergency Management and Incident Response Plan provided at Appendix CC, shows the percentage of anticipated egress through each of the gates and pathways. The Guide to Safety at Sports Ground, Sixth Edition, commonly referred to as the 'Green Guide', published by the Sports Ground Safety Authority has been used to inform the emergency modelling and egress standards within the stadium. Emergency planning has been undertaking in consultation with emergency services, and continues. Further to the Emergency Management and Incident Response Plan already provided, site plans are attached (Attachment 2 to Representation

[40] A document published by the UK Sports Grounds Safety Authority.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			3) which show the egress areas required and space available, confirming there is sufficient space for safe movement, including in the event of an emergency. It is noted that more detailed emergency planning has been undertaken and developed in consultation with emergency services, which hasn't been provided publicly for security and safety reasons.
5.	p93 [7.2]	The Draft IAR is critical of the mode share targets adopted and contends that the transport plan is '*vision led and unrealistic*' and people will tend to use their private vehicles to access major events.	As explained in Annexure P - WSP transport and movement matters 31 January 2025, at page 2, the mode share target have been identified. The targets include day one operational mode splits and aspirational targets to encourage users to increase the efficiency of the transport movements for the short period of delay. The mode share targets are based on consideration of: • reference to other new and exemplar stadia in Australia and globally; • reference to the local context in Hobart and in Tasmania; • existing travel behaviours associated with stadia in Tasmania; • audience profile for various events; • timing of various events; • strategic planning mode share targets for business-as-usual transport planning in Greater Hobart and more broadly in Tasmania; and • learned behaviour of regular patrons and staged introduction of new transport services over time. As the Transport Study notes, a specified volume of mass and public transport services is necessary to achieve what is identified as the '*optimum*' future mode-share, and access, arrangement. Having regard to scenario testing (and the conservative assumptions therein), it is apparent that this '*optimum*' arrangement is not necessary in order for access to be *acceptably* managed. Modelling supporting the submitted transport impact assessments demonstrates that it is not necessary that the mode share targets are met. When the stadium is sold out for a 24,500 seated capacity event, if most patrons arrive by car (60% compared to the target of 40%), traffic will be no worse than the drive to work or school on a weekday morning. If the mode share targets can be met through the use of event day buses and

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			other transport modes, the journey to and from the stadium will be much faster.
6.	p93, [7.2]	The event bus concept proposed is not capable of achieving the aspirational mode share target, nor could it operate as intended.	The provision of a dedicated event bus service is one element of the movement proposal for the Project, which will contribute to the mode share target. The Transport Study addresses the event bus concept, and explains the basis on which it can operate to contribute to achievement of a mode share figure consistent with the aspiration of a 60 per cent non-car mode share. As explained in the Transport Study, the ultimate scale of the event bus operation will be dependent on investment in other bus services, which may be incrementally delivered over time.[41] It is not proposed to provide 'event only' facilities beyond the stadium boundary, including to ensure that the Project does not detract from achievement of legacy benefits to Hobart and to Tasmania such as investment in public transport networks. Rather, it is proposed to use existing or planned assets where possible, including through management of any time conflicts, to maximise other infrastructure investment.[42] As recognised in the Transport Study, the ultimate design of the event bus plaza will be finalised as part of the Northern Access Road and in parallel to the Project to ensure efficient operation of the event bus service as addressed above. As Annexure P notes, the design process, including of the number of event bus stops, is a separate process. Current concept designs enable scenario testing and other considerations, and lead to the conclusion that planned infrastructure can operate acceptably in tested scenarios. The conditions in Appendix 2.0 of the POSS Summary Report require the preparation and implementation of an Events Management Plan in which the ultimate event bus offer would be secured.
7.	p94 [7.2(g), (h)]	Design of bus stops to comply with disability standards.	There is a dedicated accessible bus stand within the Bus Hub to address the concerns of the curved nature of the bus hub.

[41] RFI Annexure P, p 4.

[42] RFI Annexure P, p 4.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			Universal access is an important consideration in all relevant respects. The Transport Study explains, at page 59, that the curved curbs shown in the concept plan will be straightened as the design for the bus plaza advances.
8.	p95 [7.2(j)]	To achieve a pedestrian environment where people's circulation and movement is somewhat restricted due to difficulty on passing others (Fruin Level of Service C), it is likely that an additional area of approx. 1200sqm would be required. Given the constraints in the area it is not clear how this type of area could be achieved.	At events, people are accustomed to higher crowd densities. Comparable event bus hub designs have operated successfully across five states of Australia and several major events.
9.	p96 [7.2(q)]	The Draft IAR notes that with a lower than proposed public transport mode share would rely on patrons being dropped off/picked up in the local network.	As explained in the application material, this scenario was tested and established to result in acceptable impacts to the transport network. Furthermore, existing and future developments and uses including bars, cafes and restaurants would assist in flattening the spectator egress profile, a benefit of the CBD location. The accepted levels of conflict are capable of being addressed through EMP and otherwise.
10.	p96 [7.2(n)]	Ferry services would only be suitable for a very small number of patrons.	The Transport Study notes ferries as a possible future option. The Transport Study does not rely on ferry as a mode of transport.
11.	p96 [7.2(o)]	The Draft IAR states that the 'optimum' level of transport solutions rely heavily on external, unfunded and uncommitted infrastructure, including the Northern Access Road.	As explained in **Representation 2**, the Northern Access Road does not form part of the Project. It is subject to separate processes of assessment, approval and delivery. However, given the commitment to the delivery of the Northern Access Road through those other processes, it is appropriate for the assessment of the Project to proceed on the basis that it will form part of the transport network. It should also be noted that it is not necessary to establish that the "optimum" scenario can be achieved in order for the Project and its impacts to be acceptable.
12.	p96, [7.2(r)]	The public transport services that are provided for the stadium should be linked to opportunities that improve accessibility, travel choice, and sustainable transport outcomes for the city.	Whilst the Proponent agrees with this aspiration, there are limitations on its ability to control or achieve broader transport planning aspirations including improving access for people and communities with existing transport disadvantage.
13.	p97, [7.3(a)-(c)]	The mode-share targets (of 60% (base) and 70% (stretch) for non-car journeys) are unachievable with the	The considerations that informed the mode share targets are noted at item 5 and include existing behaviours.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		existing journey behaviours, traffic network and public transport service provisions and does not consider public behaviour change expectations to be realistic.	It is not necessary that the 60% non-car access mode share target be achieved in order for the Project, or its traffic and transport related effects, to be considered acceptable. Scenario testing included in the POSS Submission addresses the highly conservative scenario of a 40,000 person attendance, and a 46 per cent non-car mode share (well lower than the "Base Target" of 60 per cent or the "Stretch Target" of 70 per cent), and concludes that the transport network would operate acceptably in such circumstances.
14.	p98, [7.3, (d)-(f)]	The impact of construction traffic on the surrounding transport network has not been assessed in the submission material. The Draft IAR considers there is likely to be various points of localised congestion.	For a Project of this nature, there will be impacts to the transport network during construction. As with most major projects, it is accepted that these impacts are appropriately managed through a CEMP acknowledging the impacts are temporary. The Proponent's proposed condition 2 at Appendix 2.0 of the POSS Summary Report requires the preparation of a CEMP which will ensure construction traffic is managed to limit its impact on the surrounding transport network.
15.	p98, [7.3]	The Draft IAR queries how the Project will integrate with the existing transport and traffic systems surrounding the Project Site once the Stadium is operational.	Introducing a new stadium into any environment will result in impacts on traffic and transport networks. By its nature, traffic[43] associated with any large events will give rise to temporary issues of congestion and potential conflict. This much is demonstrated by events in any chosen city, including in Hobart during events such as festivals, fun runs, marches and parades, such as Sydney to Hobart Yacht Race, Wooden Boat Festival, Taste of Tasmania, Christmas Pageant, to name a few. Notwithstanding their disruptions to ordinary traffic movements, temporary traffic controls are accepted at a community scale in the context of such events, and in the vicinity of stadia, across Australia. In the case of the Project, modelling which assumes a major event, on a Friday night, with a higher proportion of people using private cars than reasonably expected, indicates that delays will be no worse than those experienced by people travelling to work or school on a Monday to Friday. In the context of a project of State significance, this level of impact is acceptable.

[43] Of all modes.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
16.	p101, [7.4]	The Draft IAR suggest that there will likely be 'a very large supply of free and low-cost on-street and off-street parking within convenient walking distance of the stadium' as the timing of many events would be outside core business hours.	Appendix J Parking memo provides: • there are around 6,000 parking bays in the existing publicly accessible parking supply (including on-street, off-street and informal bays); and • current occupancy rates for the critical periods are in the order of 10%, suggesting that sufficient parking supply is available to accommodate the stadium's needs, providing private vehicle modes can be restrained and suitable alternative transport provided. The Appendix J Parking memo also describes areas where car parking is not recommended or will be unavailable for events, along with the strategy to restrict parking in these areas. This will be progressed through the EMP (see Transport Study Appendix J Figure 2.1 for map). The Access Study also considered the demand and capacity of carparks to inform mode share considerations. Recent City of Hobart parking occupancy data from the 2024 Christmas Pageant event in the CBD with an estimated attendance of 35,000 showed that the city's three multi-storey car parks were collectively only 24.58% full during the event.

Other matters not considered in the Draft IAR

51. The Draft IAR makes no reference to the proposal for transport and movement to be managed in accordance with detailed plans prepared prior to commencement of use of the Project, including the requirements of proposed draft conditions for the OEMP sub-plans and the EMP, or that these plans are prepared in consultation with relevant stakeholders and approved by the Minister, consistent with best practice for major projects.

52. As referred to in the table above, the Draft IAR does not consider:

    (a) behaviours in how people access events, locally or nationally, now;

    (b) the transport plans, policies and strategies that the Hobart City Council and DSG have in place;

    (c) the success of event buses for major events at other venues; or

    (d) that a project of this nature can be a catalyst for change in the movement network and behaviours.

53. These are key factors which will contribute to the successful integration of the Project within the movement network.

54. The Draft IAR does not recognise the the transport related benefits that are achieved by the location of the Project. The Project Site connects the CBD to the Queen’s Domain, the Hobart Cenotaph and to the intercity cycleway and Tasman Bridge. Furthermore, sustainable event travel will be more readily achieved due to the Project Site's location close to existing public transport services and car parking, as well as bars, cafes and restaurants. These proximities will assist by flattening the spectator egress profile and allowing for multi-purpose trips.

H. Environmental effects

H1. Contamination, remediation and ground water

55. While the Project Site is subject to legacy soil and groundwater contamination, extensive work has been undertaken and advice provided by an independent Environmental Auditor to verify the remediation work that has been provided.

56. As recognised in the POSS Submission, contamination must be properly understood and responded to in developing the Project to ensure potential adverse effects on human health and the environment are mitigated. The extensive investigations and remediation of part of the Project Site mean that the Project is well prepared for the detailed design phase. The management of contamination would be addressed through conditions which requires a CEMP, including soil, acid sulfate soil and water management plans. This approach is appropriate for the scale and significance of the Project.

57. Based on the investigation and remediation undertaken to date and the proposed measures, soil and groundwater contamination, acid sulfate soils and excavated material can be acceptably managed.

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p103 [8.1(a)-(c)]	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, albeit patchy in extent. Site contamination is present in both shallow fill material and within the underlying groundwater, especially where contamination is mobile and can migrate vertically to groundwater and then as a plume horizontally. Contaminant characteristics include asbestos, petroleum hydrocarbons and metals, sometimes overlapping in distribution. The Panel notes that for any development on this site, a thorough understanding of residual site contamination is required to inform whether it represents an unacceptable	This is consistent with the POSS Submission and RFI Material. A Site Environmental Management Plan (**SEMP**) has been provided which guides and informs the management of remediation on site. The Macquarie Point site has the only statutory remediation audit system in Tasmania and includes the use of an Environmental Auditor from the EPA Tasmania Register of Interstate Contaminated Land Auditors. Advice from the Environmental Auditor outlines the remediation work that has already been completed and the audit work completed (RFI 31 January Annexure U). Ongoing careful management of any excavations involves the identification and remediation of contamination in keeping with the established processes as well as a mandatory assessment by the Environmental Auditor. This would be necessary before any sensitive redevelopment of the Project Site. This includes, but is not limited to, the Project.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		risk to human health or the environment, in the context of both construction activities and end use phases. Ultimately, the assessment of contamination must determine the suitability of the site for its intended use and whether there are requirements for management and/or remediation of contamination to achieve suitability.	
2.	p103-104 [8.1(d)]	The Panel notes contamination characteristics of excavated material to be removed from site during bulk earth work (site preparation) are also key to 104 determining disposal costs. The level of contamination classification dictates disposal options, with increasing costs as contamination levels increase. This is addressed further in section 8.4 Excavated material management of this draft IAR, as this aspect could represent a material cost to the program.	This is addressed below in respect of excavated material management.
3.	p104 [8.1(e)]	Existing contamination investigation programs have identified a number of 'areas of notable impact' (see Appendix LL, 22 October 2021, page 13, and Appendix V, 17 June 2024, page 22). These include more than three separate plumes of floating fuel and a tar plume, all located beneath the stadium building footprint. The Panel considers each of these areas has potential to represent varying risks to both construction workers and future users of the stadium, such as increased risk of vapour exposure (including vapour intrusion into overlying occupied structures, as relevant) and/or direct contact with contamination.	This is addressed below in respect of groundwater.
4.	p104 [8.1(f)-(h)]	While the Panel acknowledges selective remediation works have been completed across the site, the remediation objectives are aligned with the previous development for the former Macquarie Point Reset	Extensive contamination investigations have been undertaken as part of the Macquarie Point masterplan process and the Project. These investigations have informed extensive remediation, which has already been carried out (but which is not referred to in the Draft IAR). Presently:

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		Masterplan 2017-2030, and not the Project (which requires bulk excavation and subsurface development). Therefore, the Panel notes that gaps remain in understanding the contamination characteristics, extent and residual risks of excavation into contaminated areas. These gaps, and the works required to address them, have been identified by the Proponent but this additional data is not currently available (see, Appendix V, 17 June 2024, section 7). The Panel notes that the Proponent considers there are no known residual contamination issues that are considered to represent a potentially unacceptable risk to the use of the site, but it is uncertain as to whether additional remediation is required, due to the knowledge gaps (see Annexure S, provided as further information on 31 January 2025, pages 2-4). (h) However, the Panel considers that without this additional contamination data, there remains uncertainty as to whether there is any site contamination that cannot be effectively managed, and whether additional remediation is required and how this would affect any site suitability assessment.	• physical site remediation is substantially complete, with the site investigations presented in the POSS Submission and RFI Material having been undertaken to support future design and development on site; • work has been phased and spread across seven distinct areas of the Project Site, allowing for progressive sign-off as remediation occurs and to provide an approval that the land is ready for future development to occur and be safely utilised by occupants. Four of these areas are now signed off, with Audit Areas 3 (part), 5 (part) and 6 remediated and waiting for sign off from the Environmental Auditor, which is expected to happen within 2025; • the only remaining remediation required in addition to these sign offs is the removal of a historic diesel pipeline at a small section of land (Audit Area 4 East), which will be phased in to works as appropriate and a known extent of buried stockpile of asbestos that is also located within Audit Area 4; and • the Environmental Auditor has provided a statement in the information already provided to the Panel (Further information provided 31 January 2025, Annexure U), which notes: 'At this time, there is no obvious impediment to the Site being able to be remediated, and residual contamination managed, in a way that allows the proposed development to occur' and that 'The overall approach and process to remediation and management is reasonable'. The works carried out to date comprise: • excavation of 85,000 tonnes of contaminated soil; • removal or beneficial reuse of 72,000 tonnes of soil; • removal of 2.3 million litres of contaminated groundwater; • carrying out of early 2,000 soil samples and 175 groundwater wells; • removal of 1,400 spoil samples to confirm soil decontamination; and • removal of nearly one kilometre of ageing oil and diesel pipelines, previously used by industry and the navy. The Proponent has not faced any remarkable or unexpected issue in remediation activities or disposal of excavated material.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			In respect of what contaminated material now remains, treatment and management of contaminated material presents a risk to human health and the environment without appropriate disposal.
5.	p104, [8.1(i)]	The Panel notes that the construction of the basement car park below standing water levels represents a large impermeable barrier that has the potential to impact contaminant flow directions and velocities, and therefore risks to receptors (construction workers, future site users and down-gradient ecological receptors). The Panel considers that this is particularly relevant as residual groundwater contamination has been identified adjacent to the proposed basement car park. The Panel notes the existing hydrogeological model (Appendix FF, 17 July 2024) does not include an assessment of likely changes during construction and after development, and therefore the associated risks are difficult to assess at this stage.	This is addressed below in respect of groundwater.
6.	p105, [8.1(j)]	The acid sulfate soil testing was not designed around the stadium construction requirements and this may have implications on the treatment and management of dewatering during the construction process.	Appendix KK - Preliminary Results of Acid Sulfate Soil Investigation prepared by AECOM (2 August 2024) identified no actual acid sulfate soil and some potential acid sulfate soil in the fill and natural estuarine material within the central and eastern parts of the Project Site. The results also indicate that the fill material above the water table is likely to have sufficient natural Acid Neutralising Capacity (**ANC**) to prevent acidification during and after construction. The deeper estuarine soil may require additional management procedures to prevent acidification. Appendix KK provides that mitigation measures for potential acid sulfate soil identified include:[44] *'Assessing if the underground car park or pile installation will expose PASS to oxygen (above the water table) and excavation of any potentially exposed PASS if so. Excavated PASS may require ex situ treatment such as liming or other measures to prevent potential acidification when exposed to air.'* *'Consideration of protective measures for materials which will be in contact with PASS, noting that the saline conditions of*

[44] Appendix KK of the POSS Submission - Preliminary Results of Acid Sulfate Soil Investigation prepared by AECOM (2 August 2024), p 3.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			groundwater at the Site are likely to require similar protective measures in any event.' It would be appropriate for the management of potential acid sulfate soil through an acid sulfate soil management plan to be a condition of approval for the Project. This will form part of the CEMP.
7.	p106, [8.2]	The management of groundwater contamination during the construction process is uncertain, particularly during dewatering required for the basement carpark.	Groundwater investigations have identified areas of contaminated groundwater, including Light Non-Aqueous Phase Liquid (**LNAPL**) and Dense Non-Aqueous Phase Liquid (**DNAPL**) plumes below the stadium building footprint. The LNAPL is from historical fuel storage on the Project Site and the DNAPL is from historic gasworks activities. The SEMP explains that AECOM carried out a detailed assessment of LNAPL as part of the masterplan process in *Assessment of LNAPL Remediation End-Points 2020*. This assessment concluded that the LNAPL plumes are sufficiently stable and that future recovery of LNAPL is impracticable. It is noted that the development plan for the Project Site at that time did not include the same depth of subsurface constructions as is now proposed. Given the groundwater depth ranges from 1 to 6 metres below ground level across the Project Site, there is potential for the subsurface construction to encounter groundwater. The proposed three levels of basement carpark are below groundwater and within 1m of a known contamination plume. Potential risks to human health and the environment from interaction with or migration of the contaminated groundwater will be appropriately managed, as may be expected in accordance with the requirements of proposed conditions and its requirements for the CEMP. Consistent with the recommendations in the SEMP and standard practice for major projects, a detailed assessment of groundwater contamination would be required as part of the detailed design process to inform the final design of the stadium and constructional and operational requirements. This detailed assessment would specify any further remediation if required. In respect of the suggestion in the Draft IAR that safety and construction issues may arise from groundwater management issues (particularly in respect of the development of the underground car park), it is noted that these matters are properly accounted for in the material and consistent with the construction of a pumpstation immediately adjacent to the site and four metres lower than the lowest point of the car park design.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
8.	p110, [8.4(b)-(c)]	The total amount of materials that require excavation may be underestimated as the POSS Submission refers to different total volumes of excavated material and no information on how the volumes have been calculated.	The Appendix AA Construction Management Plan (August 2024) (**CMP**) estimates that 180,000 tonnes of material would be removed from the Project Site to allow for the construction of the stadium itself, while Annexure B of the material submitted on 14 February 2025 provides an additional estimate of 115,000 tonnes for the underground car park (for a total estimate for of 295,000 tonnes of excavated materials). The total volume of excavated material will depend on the final design of the Project. A precise figure cannot be stated at this point in the assessment and approvals process. As is the usual approach for major infrastructure projects, an estimate of the total volume of excavated material is provided, along with principles for how the material is to be dealt with at the assessment stage. Actual volumes of material excavated would depend on the final design. The CEMP and the SEMP required by conditions would address the storage, testing, re-use and disposal of the material.
9.	p110-111, [8.4(h)]	The construction timelines within different application material documents are inconsistent.	The CMP indicates 8-10 months for site remediation and bulk excavation, Annexure B to the RFI submitted on 14 February 2025 – Construction management plan comments – carpark construction and site dewatering management (14 February 2025) indicates 7.5 months for the bulk excavation for the underground car park and the Noise Supplementary Report indicates 0-3 months for bulk excavation. It may be noted that: • timelines identified in documents are not in fact inconsistent, but instead are either broad and indicative, or refer to the type of activities which are the direct subject of relevant documents; and • it is reasonable for timeframes to be indicative until the final CEMP provides an updated estimate based on the final design and acknowledge contingencies in development timelines for a major project.
10.	p110-111, [8.4(d)-(g), (i)]	The lack of detail regarding the categorising, treatment, reuse and treatment of excavated material is not addressed in detail. For material being disposed of, constraints on landfill capacity may lead to longer excavation timelines and greater costs.	The CMP and Annexure B – Zancon Construction Management Plan Comments (dated 14 February 2025) set out the proposed management program for excavated material. These documents explain that excavated material will be stockpiled on-site and tested before being categorised for reuse or disposal. Contaminated material would be disposed of at licensed facilities. Material from piling operations will be evaluated for reuse or disposal.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			Work has been undertaken to provide alternatives to this including undertaking testing in situ to reduce the amount of stock-piling required. If the excavated material cannot be stored and tested on-site, the final CEMP and SEMP will provide a tailored solution for the storage and disposal of the material. It is a matter for the Proponent to dispose of excavated materials in accordance with the EPA's standards. It is for this reason that the capacity of landfill facilities is not critical to the assessment of the Project. The Proponent's remediation consultant has engaged with local recipient sources of the various levels of contaminated material and confirmed in principle capacity. Options to reuse some fill will also be explored.

Other matters not considered in the Draft IAR

58. In discussing soil and groundwater contamination and remediation, the Draft IAR did not:

(a) address the benefits of the further remediation that would occur through the re-development of the Project Site; or

(b) consider the draft conditions proposed by the Proponent included in Appendix 2.0 to the Summary Report to respond to these matters. The conditions require:

(i) the CEMP to include management plans in respect of, amongst other things, soil management, water quality and management and acid sulphate soils;[45] and

(ii) the OEMP to include a water quality and water management plan.[46]

59. For a Project of this scope, it is appropriate that further testing and management occur post approval

[45] Draft conditions 4.3.6, 4.3.7 and 4.3.10 (Summary Report p 253).

[46] Draft condition 5.3.1.10 (Summary Report p 254).

H2. Stormwater

Summary and key facts

60. The application material explains the detailed stormwater analysis undertaken in respect of the Project and sets out the proposed further design and ongoing stormwater management plan that would occur following approval of the Project. The level of analysis and design undertaken to date is appropriate for a project of this nature. Ensuring the final detailed design acceptably manages stormwater flows and quality is appropriately dealt with via conditions as proposed by the Proponent in Appendix 2.0 to the POSS Summary Report.

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p108 [8.3(a)]	Developments inherently change the stormwater flows for the footprint they cover, especially where the existing environment predominantly consists of unsealed surfaces, rather than impermeable surfaces.	This is consistent with the POSS Submission and RFI Material.
2.	p108, [8.3(b)]	The extent of stormwater capture associated with the stadium building and large impermeable paved areas would represent a significant change to the flows across and leaving the Macquarie Point site.	The development of the Project Site would result in a change to stormwater flows and capture. This would be the case with most re-development of the Project Site. As set out below and in the POSS Submission and RFI Material, the stormwater can be appropriately managed through a management plan secured via a condition of approval.
3.	p108, [8.3(c)]	The current site drainage at Macquarie Point consists of several catchments serviced by stormwater systems discharging to Hobart Rivulet to the north, Victoria Dock to the south-west and through TasPorts land to the east.	This is consistent with the POSS Submission and RFI Material.
4.	p108, [8.3(d)]	The Panel notes that the Proponent's services report shows there is generally sufficient capacity to dispose of stormwater using the existing stormwater systems (Appendix BB, August 2024, page 19-21). However, the Panel notes that the capacity of some stormwater pipes has not been validated and is an assumed capacity.	The validation of capacity of existing stormwater infrastructure occurs as part of the detailed design stage and planning to respond will be included in the CEMP. If capacity is insufficient, the final stormwater management plan would require upgrades to be implemented.
5.	p108-109 [8.3(e)-(f)]	The Panel notes that during flood events (1% Annual Exceedance Probability) the runoff from the stadium roof would exceed the available capacity of stormwater	This is addressed below in respect of flooding.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		systems that are proposed to be connected to the stadium roof (Appendix BB, August 2024, page 21). The Proponent intends to rely on designing overland flow paths to cater for excess water during flood events (Appendix BB, August 2024, page 21). The Panel considers there is likelihood that the reliance on overland flow paths to manage stormwater during flood events may intensify flooding in the nearby area, particularly in the vicinity of the intersections of Davey Street with Hunter and Campbell Streets. The Panel notes that the Proponent's flood modelling (Appendix W, 23 August 2024) does not consider the potential for the Project to cause or contribute to flooding on adjacent land.	
6.	p109 [8.3(g)]	The State Policy on Water Quality Management 1997, and its framework for achieving water quality objectives, sets stormwater-management discharge-targets within the State Stormwater Strategy, December 2010. These discharge targets are set as a percentage reduction in total suspended solids, total phosphorus, and total nitrogen, when compared to the site with no stormwater quality management.	This is consistent with the POSS Submission and RFI Material.
7.	p109, [8.3(h) and (i)]	The Panel notes the Proponent's proposed management of stormwater via bio-retention systems connecting to the stormwater system would not achieve the discharge targets when the stormwater from the stadium roof is included (Appendix S, 26 August 2024, page 30). The Proponents' stormwater report acknowledges there are limited options to reduce contaminant loads off large roof areas, with the exception of capture and re-use, but that space constraints appear to limit treatment options (Appendix S, 26 August 2024, page 31).	Clause 31.3 of the *State Policy on Water Quality Management* (1997) allows the Board of the Tasmanian Environment Protection Authority (**EPA**) to develop best practice guidelines for stormwater management. These guidelines are contained in the *State Stormwater Strategy 2010*, which sets the following stormwater management discharge objectives: *'80% reduction in average annual load of Total Suspended Solids* *45% reduction in average annual load of Total Phosphorus* *45% reduction in average annual load of Total Nitrogen* *90% reduction in average annual load of litter/gross pollutants (non-statutory)'*

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			The *State Stormwater Strategy 2010* recognises that there may be alternative objectives that meet the Water Quality Objectives set out in the *State Policy on Water Quality Management 1997*. The stormwater quality modelling using a Model for Urban Stormwater Improvement Conceptualisation (**MUSIC**) shows that stormwater management controls proposed in the POSS Submission meet the objectives for total phosphorus and total gross pollutants but not the other objectives. Section 5.4 of Appendix S Macquarie Point Stormwater Management Plan (26 August 2024) (**SWMP**) and Annexure T Stormwater management comments (**Stormwater RFI**) acknowledge that for all discharge objectives to be met, some or all of the stadium roof runoff would require treatment. The Stormwater RFI explains that there are different means of achieving the objectives through design and operational measures. For example, stormwater could be temporarily stored and passed through additional bio-retention systems prior to discharge or roof runoff could be collected in larger storage tanks (larger than currently assumed in the SWMP) and reused internally. However, the cost of these measures must be weighed against the benefit achieved in circumstances where the discharge objectives are partially met. It is noted that the recommendations set out in the Stormwater RFI are embedded in the landscaping design. The SWMP provides that the collection and reuse of runoff from the Stadium roof will assist in meeting the Stormwater Management Objectives but explains that the final design cannot be determined at this stage. At section 5.4.2, the SWMP states: *'The ability to effectively integrate rainwater collection and reuse systems (for Site buildings and potentially the stadium roof) cannot be determined at this early design phase of the Site. It is a recommendation of this assessment that so far as practicable rainwater collection and reuse does occur to assist in meeting Discharge Objectives for water quality, as well as offsetting potable water demands from regional supplies. Achievement of these criteria should further the Green Star credentials of the proposed development.'*

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			'This has been excluded from assessment at this time, however, it is noted that collection and reuse of rainwater from stadium roofs is relatively common practice, and several stadiums across Australia, e.g. Bankwest Stadium, Marvel Stadium, Stadium Australia, People First Stadium (also known as Carrara Stadium) utilise rainwater collection and reuse systems. These stadiums appear to have generally larger collection tanks ranging from several hundred thousand litres to a couple of megalitres. Reuse types include toilet flushing, and or field irrigation for example.' For a project of this nature, it is appropriate that further stormwater modelling would occur throughout the design process to ensure that the final design meets the stormwater management targets where possible. This is achieved through conditions of approval.
8.	p109, [8.3(k) and (l)]	The Panel notes the stadium building design does not include any capture and reuse of stormwater from the stadium roof. The Panel considers the capture and reuse of stormwater from the stadium roof would likely be costly and challenging to implement within the current stadium design, but would likely be necessary to meet stormwater discharge targets	The SWMP recommends collection and reuse of runoff from the stadium roof, noting that this would assist in satisfying the Stormwater Management Objectives. However, the SWMP explains that the collection and reuse is achievable under this design, however the final design cannot be determined at this stage of the design process. At section 5.4.2, the SWMP states: *'The ability to effectively integrate rainwater collection and reuse systems (for Site buildings and potentially the stadium roof) cannot be determined at this early design phase of the Site. It is a recommendation of this assessment that so far as practicable rainwater collection and reuse does occur to assist in meeting Discharge Objectives for water quality, as well as offsetting potable water demands from regional supplies. Achievement of these criteria should further the Green Star credentials of the proposed development.'* *'This has been excluded from assessment at this time, however, it is noted that collection and reuse of rainwater from stadium roofs is relatively common practice, and several stadiums across Australia, e.g. Bankwest Stadium, Marvel Stadium, Stadium Australia, People First Stadium (also known as Carrara Stadium)*

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			utilise rainwater collection and reuse systems. These stadiums appear to have generally larger collection tanks ranging from several hundred thousand litres to a couple of megalitres. Reuse types include toilet flushing, and or field irrigation for example.' As set out above, it is appropriate that the final stormwater management plan be resolved through the detailed design process, which is required as a condition of approval.
9.	p109, [8.3(j)]	The Panel notes that details of proposed bio-retention swales, litter traps and the like, including their on-ground locations, has not been provided. Consequently, the Panel considers there is no evidence there is sufficient space within the site to accommodate the amount of area that would be required for the bio-retention system (see Appendix S, 26 August 2024, page 26).	Section 6.2 of the SWMP recommends that elements of the proposed stormwater system be embedded into the design requirements for surfaces (e.g. concourse areas, roads and accessways, pedestrian and open space area, etc) outside of the stadium building. The SWMP explains that bio-retention systems may be configured in a manner of different shapes and sizes, including being integrated into landscaping. It is appropriate the design of these systems occur as part of the detailed design process and be required through a condition of approval.
10.	p109, [8.3(m)]	The Panel further considers that if the stormwater discharge targets are not likely to be met, there may be an increased risk to impacts on the marine ecology of Timtumili Minanya/River Derwent.	This is addressed below in respect of biodiversity impacts.
11.	p109, [8.3(n)]	The Panel notes construction stage stormwater controls are proposed to include sediment ponds adjacent to excavations for treatment prior to approved disposal (Annexure B, provided as further information on 14 February 2025). These ponds are also proposed to be used to manage groundwater dewatering activities. Given the apparent gaps in understanding groundwater dewatering demands (see section 8.2 Groundwater of this report), the Panel considers there are associated gaps in understanding whether the ponds have sufficient capacity and treatment capability to meet these combined demands.	It is proposed to use sediment ponds for the collection and treatment of stormwater during the construction process. These ponds are also proposed for storage of groundwater dewatering. The capacity of the stormwater treatment ponds for construction is a matter that will be appropriately addressed through the final CEMP. It is noted that these well utilised management measures and are universally accepted practice and guidelines on the development and maintenance of these are clearly illustrated in stormwater management guidelines and manuals.

Other matters not considered in the Draft IAR

61. The Draft IAR fails to acknowledge the detailed design of stormwater system and the stormwater management proposed through conditions. The draft conditions included in Appendix 2.0 to the POSS Summary Report require that prior to the commencement of the development for the Project the following must be approved by the Minister:

    (a) UDLPs that implement, amongst other things a Stormwater Management Plan;[47]

    (b) a CEMP that includes a water quality and water management plan to prevent and manage on-site and surrounding hydrology, water quality and stormwater drainage impacts.[48]

62. The draft conditions also require stormwater connections from the Project Site to be provided or upgraded as necessary to the satisfaction of the Minister before the use of the stadium use commences.[49]

[47] Draft Condition 3.1.4 (Summary Report p 252).
[48] Draft Condition 4.3.7 (Summary Report p 253).
[49] Draft Condition 7.3.5 (Summary Report p 256).

H3. Flooding and costal inundation

Summary and key facts

63. A comprehensive analysis of the flooding impacts has been undertaken. The application material demonstrates that there is no flood risk on the Project Site. There is potential for some properties surrounding the Project Site to be affected during a 1% Annual Exceedance Probability (**AEP**) flood event. These impacts are capable of being managed through the OEMP and the EMP required by the conditions proposed by the Proponent.

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p108-109 [8.3(e)-(f)]	The Panel notes that during flood events (1% Annual Exceedance Probability) the runoff from the stadium roof would exceed the available capacity of stormwater systems that are proposed to be connected to the stadium roof (Appendix BB, August 2024, page 21). The Proponent intends to rely on designing overland flow paths to cater for excess water during flood events (Appendix BB, August 2024, page 21). The Panel considers there is likelihood that the reliance on overland flow paths to manage stormwater during flood events may intensify flooding in the nearby area, particularly in the vicinity of the intersections of Davey Street with Hunter and Campbell Streets. The Panel notes that the Proponent's flood modelling (Appendix W, 23 August 2024) does not 109 consider the potential for the Project to cause or contribute to flooding on adjacent land.	The SWMP proposes to design overland flow paths to capture excess water during 1% AEP flood events. The Draft IAR raises concern that this design solution will intensify flooding in vicinity of the Project Site, including at the intersection of Davey Street with Hunter and Campbell Streets. The Overland Flood Assessment demonstrates that the Project Site is free from costal and riverine inundation during 1% and 5% AEP flood events with and without climate change projections. The modelling also indicates that: • during 1% and 5% AEP flood events with climate change projections, Davey and Hunter Streets are inundated to modelled depths of less than 0.24m; • during a 1% AEP flood event, the corner of Davey and Campbell Streets is subject to moderate peak flood depth and peak velocities exceeding 5 m/s before the flow enters the marina; SWMP modelling of the development shows a net decrease of overland flow from 0.32m3/s (pre-development) to a reduced 0.1m3/s (post development) to this intersection. • inundation of Davey Street results from flow originating from the constructed underground channel of Hobart Rivulet surcharging at Collins Street, at the Royal Hobart Hospital, along with upstream flow surcharging at Liverpool and Barrack Street. • SWMP modelling notes a slight increase to the intersection of Evans Street and Hunter Street of 0.27m3/s pre development to 0.98m3/s post development. Modelling suggests the increased overland flow

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			can be accommodated in a combination of increased pipe capacity and onsite storage resulting in a net zero change from pre to post development. The Overland Flood Assessment states that there are potential evacuation routes from the Project Site that avoid the flood affected areas and as the site is unaffected by inundation patrons may shelter in place. Since the POSS Submission and RFI material, further modelling has been undertaken which shows areas immediately surrounding the stadium are safe for emergency egress, if required. The Hobart Rivulet has a very short surcharge event <40min and therefore sheltering in place is acceptable in Tasmania as an emergency solution. Emergency response measures are appropriately dealt with in the EMP required by the conditions proposed by the Proponent.

Other matters not considered in the Draft IAR

64. The Draft IAR did not consider how potential flooding of adjacent properties could be addressed through design modifications and management of operations. These conditions are addressed above in relation to stormwater.

H4. Noise and vibration

Summary and key facts

65. Noise and vibration during construction and operation will contribute to the existing active environment of the waterfront and the Port. The stadium would not be an exceptionally noisy land use in this context.

66. Construction noise and vibration will need to be managed. It can be managed through the CEMP and the Construction Noise and Vibration Management Plan (**CNVMP**).

67. Noise from sporting events and general operations of the stadium are predicted to be *'just noticeable'* or *'unlikely to be noticeable'* relative to existing ambient noise levels at sensitive receptors around the site. Noise from sirens and during concerts will exceed those noise levels, but intermittently and not inconsistently with current experiences during events and otherwise.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p103, [8.0]	Construction noise, particularly during excavation, is likely to adversely affect the amenity of adjacent land users.	The Noise and Vibration Assessment prepared by AECOM (21 August 2024) (Appendix Q to the POSS submission) (**NVA**) and the Noise Assessment Supplementary Report prepared by AECOM (Annexure Q to the RFI response submitted on 31 January 2025) (**Noise Supplementary Report**) in summary indicate that: • bulk excavation and piling would result in the highest noise levels at sensitive receptors with two residential receptors expected to be *'Highly noise affected'* (>75dB); • three residential receptors are likely to be affected by *'moderately intrusive noise'* (more than 20dB above the noise management level[50]) during the substructure and stand construction; • one residential receptor is likely to be affected by *'moderately intrusive noise*' during the stand, roof and façade construction. Whilst construction noise will impact sensitive receptors to varying degrees at different stages of the construction process, these impacts are

[50] Based on the *NSW Department of Environment and Climate Change Interim Construction Noise Guideline 2009*.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			temporary in nature and would be acceptably managed through a combination of mitigation measures, including: • scheduling of works; • selection of quieter construction methods and equipment; • noise barriers and other physical works; • ongoing monitoring; and • ongoing community notification and engagement.[51] The final combination of mitigation measures would be resolved through the detailed design process and specified in the CNVMP and the CEMP.
2.	p103, [8.0], [8.5(j)]	Operational noise and lighting would be most impactful on adjacent residential amenity, particularly during night time events.	The main operational noise emissions will be generated during sporting events and concerts. The NVA and the Noise Supplementary Report in summary identified that:[52] • predicted noise levels from concerts will be audible relative to the existing ambient noise levels. A rock concert would be the *'worst case scenario'* with other concerts (pop or RnB) being less noticeable; • noise from the PA system and game sirens are likely to be audible over existing ambient noise levels; • noise associated with patrons entering and leaving the Project Site is unlikely to be noticeable for receptors except those the apartments on Evans Street directly opposite the Project Site; • noise associated with patrons at the food and beverage premises is unlikely to be noticeable at the majority of receptors; and • noise associated with the bus plaza, building services, temporary generators and loading dock and waste collections are unlikely to be noticeable over existing ambient noise levels. In respect of concert noise, the impact must be understood in the context that it is proposed to hold one concert per year. The duration of concert related noise impacts is insignificant. Whilst the Draft IAR is concerned

[51] Noise Supplementary Report, section 4.5.

[52] NVA, pp 15 and 16.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			that concert noise has the potential to cause sleep disturbance during the night, the Draft IAR fails to acknowledge that only one concert is proposed per year and does not address how restrictions on operating hours could limit the impact of nighttime concert noise to the few sensitive receptors affected. It is also does not acknowledge that events, including music events are already help in nearby locations in the city. Noise from sirens during games should be considered as a discrete maximum noise emission rather than an averaged maximum over a 15 minute period. The area surrounding the stadium would currently, and in the future, experience other similar maximum noise levels from time to time (for example, emergency vehicle sirens and helicopters servicing the hospital). At paragraph 8.5(j), the Draft IAR comments that '*predicted noise levels in the vicinity of the Stadium during sporting events and concerts would exceed the existing ambient noise levels at nearby sensitive receptors.*' However, this is incorrect. Noise from sporting events and general operations of the stadium are predicted to be *'just noticeable'* or *'unlikely to be noticeable'* relative to the existing ambient noise level.
3.	p112, [8.5(g)]	The reports provided by the Proponent do not address the principle of retaining a reserve capacity in the acoustic environment as outlined by the EPP. The Panel considers that retaining a reserve capacity in this locality is important to provide for future growth and unrestricted operation of both the Port of Hobart and the strategic road network and the Royal Hobart Hospital.	The *Environment Protection Policy (Noise) 2009* (**Noise EPP**) is a State Policy which aims to protect specified environmental values. The environmental values that are protected are: *'the qualities of an acoustic environment that are conducive to –* *(a) the wellbeing of the community or a part of the community, including its social and economic amenity; or* *(b) the wellbeing of an individual, including the individual's –* *(i) health; and* *(ii) opportunity to work and study and to have sleep, relaxation and conversation without unreasonable interference from noise.'* The Noise EPP goes on to provide that that the values in (b) above are deemed to be protected for the majority of the population:

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			'where the acoustic environment indicator levels are not exceeded, and there are no individual sources of noise with dominant or intrusive characteristics'.[53] The Noise EPP provides that commercial activities should seek to retain 'reserve capacity' in the acoustic environment to allow for other reasonable noise emissions.[54] However, the Noise EPP also acknowledges that: • retention of *'reserve capacity'* may not be required when there is unlikely to be additional noise sources or the proposal is clearly of public interest;[55] and • even where best practice environmental management is implemented, noise emissions may prejudice the protection of the relevant environmental values or provide insufficient reserve capacity. In these cases, the EPP provides that the EPA as the relevant regulatory authority should ensure that reviews of the noise activity take place to assess whether emissions can be further reduced. The Draft IAR raises concerns that the Noise Assessment and the Noise Assessment Supplementary Report have not considered reserve capacity. The Noise EPP is not prescriptive. It is a guide for assessing noise impacts. The provision of reserve capacity is one factor to be considered in assessing whether noise impacts are acceptable. The provision of reserve capacity is unnecessary when the Port and hospital operations already exceed the indicative levels in the Noise EPP and whilst traffic noise is assessed separately, the stadium use would not regularly correlate with peak traffic times.
4.	p111, [8.5(s)]	The Draft IAR suggests that the acoustic mitigation measures are uncertain.	The Draft IAR suggests that the acoustic mitigation measures are uncertain. The Noise Assessment and the Noise Assessment Supplementary Report outline a range of mitigation measures that could be used to minimise construction and operational noise impacts. At this point in the design and assessment process, it is appropriate for mitigation measures be resolved and implemented through conditions of approval,

[53] Noise EPP, cl 7(3).
[54] Noise EPP, cl 12(4).
[55] Noise EPP, cl 12(5).

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			including via an updated noise and vibration assessment based on the final detailed design of the stadium. The Proponent's draft conditions require the CEMP and OEMP to address noise and vibration impacts.
5.	p78, [6.2.2(k)]	While the weighted and/or time averaged decibel level of construction related noise may be acceptable or able to be managed, the construction of the stadium would also generate sound with tonal and other characteristics that are likely to be incompatible with the activities occurring at the Federation Concert Hall. The Proponent's summary report outlines approaches that may be taken to managing construction site noise effects (see page 17 Annexure Q, provided as additional information on 31 January 2025), including the reference to good practice techniques documented in guides from NSW and Victoria. However, these may not be sufficient to mitigate the effect construction stage noise has on the current operations at the Concert Hall.	The Panel has not explained the basis for, or justified, this comment. The Proponent considers that the effect construction stage noise has on the current operations at the Concert Hall can be appropriately managed. This includes through mitigation measures as part of the CEMP and if useful, there may also be opportunities to improve the noise protections in the Federation Concert Hall that protect it from noise and vibration in the area generally, such as those generated from emergency helicopter movements, other emergency vehicles on the adjacent major roads and concerns around occasional instances where there could be overlap in noise-sensitive activities and activities that could generate noise at higher levels.
6.	p82, [6.2.4(h)]	Section 8.5 Noise of this draft IAR considers noise issues in detail. The Panel notes that noise and vibration may affect the experience of users of surrounding buildings and spaces, even if minimum noise standards are met. While construction noise is not permanent, the construction period would be extensive, and the bulk excavation and piling stage is expected to have a particularly high level of noise impact. The Proponent's Construction Management Plan (Appendix AA) does not provide a significant amount of detail on how construction issues would be managed, although the Proponent's reports generally suggest construction activities are likely to start at 7am on weekdays and 8am on Saturdays. The Panel considers this is likely to be significantly disruptive to accommodation uses closest to the site. The Panel notes early morning noise would likely affect sleep, including for those on holiday and people working shift work. The Panel considers it is likely that occupancy rates for the hotels and apartments closest to the site would be significantly impacted by the	As stated in **Representation 1** and the body of **Representation 2**, the Panel has not explained the basis for, or justified, this comment. The Proponent also refers to its response provided in item 1 of this section.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		construction stage, and this would have a material detrimental effect on those businesses.	
7.	p82, [6.2.4(i)]	The Panel notes that if pedestrian infrastructure linking the stadium to the northern end of Collins Street were to be constructed, this would exacerbate construction noise in close proximity to residential uses around Wapping. However, the Panel notes the duration of construction for this infrastructure would not be as lengthy as for the stadium building. During operation, patrons leaving events via a Collins Street pedestrian bridge would likely cause an increase in noise to residential uses around Wapping from patrons leaving events, at times late at night.	As stated in **Representation 1** and the body of **Representation 2**, this assessment assumes an expansion of the Project scope beyond the Project as described.

Other matters not considered in Draft IAR

68. Other than as outlined above, the Proponent does not consider that there are any other matters relevant to noise and vibration which are not addressed in the Draft IAR.

H5. Lighting effects

Summary and key facts

69. The lighting design considered the extent of light spill, which is calculated to be minimal. The assessment of lighting at and around the stadium was carried out in accordance with Australian Standard AS4282 Control of obtrusive effects of outdoor lighting (**AS4282**). It uses modelling, conservatively assuming the maximum level of light output, to identify potential interactions with surrounding uses and impacts on the environment.

70. Based on the assessment, stadium lighting can be designed and managed to have no unacceptable impact on:

    (a) animals;

    (b) neighbouring land uses, including the Port;

    (c) users of surrounding roads; and

    (d) nearby areas of significance including the Cenotaph.

71. In addition to their management through design, potential impacts would be further reduced in various ways, including operating restrictions and lighting controls. These measures will be further developed through the detailed design process and will be deleted in the Events Management Plan proposed for as a condition for approval.

Issues identified in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p114, [8.6(a), (b)]	Lighting has the potential to be a hazard to transport through glare impairing visibility of objects or through visual clutter.	It is acknowledged that in certain circumstances lighting glare may affect road safety. However, the impact of lighting from the stadium can be managed such that road safety is unlikely to be adversely affected. The report titled Introba Lighting Assessment (31 January 2025) (Annexure R to the RFI response submitted on 31 January 2025) (**Lighting Assessment Report 2024**) concludes that such impacts as a result of the Project are acceptable. Drivers are unlikely to be negatively affected by any direct lighting or glare as traffic is outside the focal point of the sports lighting and the roof and façade will provide shielding. As outlined in reporting, lights will be directional and external lighting will point down. There will be no lighting

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			that appears to cause a material risk to traffic than would otherwise occur for basing a landmark with lighting for safety in the surrounding areas. The vertical light emissions would be less than or comparable to street lighting (that is, <25 lux). A condition of approval is agreed to include ensuring that the final lighting scheme does not reasonably impact drivers and traffic safety.
2.	p114, [8.6(a), (b), (d)]	Lighting has the potential to reduce the amenity of nearby residences, where it spills into a habitable room, which may cause annoyance, distraction, or discomfort or impact on sleep patterns. The greatest potential for impacts from lighting, additional to the existing bright environments of Davey and Evans Streets, are likely to be caused by light spill from bright sports or event lighting, visual clutter or other lighting that is poorly positioned and shielded.	The lighting design has considered the extent of the light spill, which is calculated to be minimal. The Lighting Assessment Report 2024 has assessed the lighting scheme proposed for the stadium. The assessment has been undertaken in accordance with AS4282. The assessment carried out is conservative. The full lighting output has been assessed against environmental zone A4 in AS4282 rather than the applicable TV zone which is the standard applied for major sport and event stadiums during TV broadcasts. Furthermore, the assessment has been based on AS4282-2019, which is more onerous that the current AS4282-2023, which does not set any limits for broadcast level lighting. As recognised by the Lighting Assessment Report 2024, potential impacts would be further reduced in various ways, including operating restrictions and lighting controls. These measures will be outlined in the Events Management Plan required by the conditions proposed by the Proponent.
3.	p115, [8.6(f)]	The lighting assessment is based on a concept level design of the stadium building façade, and does not consider the effects of façade lighting, illuminated signs, or lighting of entrances, plazas, practice wickets or the relocated goods shed.	The detailed design of the stadium façade and decorative lighting scheme is being progressed through the detailed design process, and will meet requirements set out in the Event Management Plan. The final scheme will comply with AS4282 to ensure amenity impacts are reasonable. The Proponent's submission outlined conditions address the detailed lighting design, including the façade design. A condition of approval requiring compliance with AS4282 would be supported. The recommendations in the Lighting Assessment Report 2024 are being incorporated into the detailed scheme, including dimmable, programable lighting with a central control panel, shielding mechanisms where necessary and restrictions on lighting operating times.
4.	p115, [8.6(g)]	The Panel notes that revised plans provided by the Proponent show glazing and solid structural elements	The Lighting Assessment Report 2024 is an assessment on a 'concept' lighting scheme as the project. As explained in Lighting Assessment

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
		removed from the underside of the roof (see Annexure B consolidated plans 3, provided as further information on 17 February 2025 page 3). The Panel considers that this alteration to the stadium building design would likely change the light spill from sports lighting that is modelled in the Proponent's reports (Appendix P, 4 September 2024).	Response 2025, the assessment involved lux modelling of the proposed sports lighting layout using AGI32 software and is therefore not an 'assumption'. As with all major infrastructure projects, it is appropriate that that the detailed lighting scheme be prepared as part of the detailed design process. The scheme will comply with AS4282.
5.	p115, [8.6(i)]	The Panel considers that the revised stadium design has the potential to negatively impact the Cenotaph's decorative lighting is perceived.	Section 2.5.2.5 of the Lighting Assessment Report 2024 recognises that the effectiveness of the Hobart Cenotaph's decorative lighting is contingent upon the nearby area being dimly lit. Based on the horizontal and vertical lux value calculations of broadcast lighting at the stadium, the overall light emitted is low. The Hobart Cenotaph is located to the north of the Project Site. The light spill to the immediate north of the Stadium is very low (<1lux) and will reduce with distance. On this basis, the Lighting Assessment Report 2024 concludes that the Hobart Cenotaph's decorative lighting will not be negatively impacted.
6.	p115, [8.6(i)]	The Panel further considers that the revised stadium design has the potential to negatively impact port functions.	The Lighting Assessment Report 2024 demonstrates that the light spill on the Port area is minimal, namely <1 horizontal lux and between 0 and 10 vertical lux at the water edge. This is significantly below the levels referenced in AS4282, noting that the vertical lux standard of 25lux is not mandatory. From a navigational perspective, the lighting would be perceptible but the measurable light contribution to the urban coast would be negligible.
7.	p115, [8.6(h)]	The *Australian Standard 4282:2019 Control of the obtrusive effects of outdoor lighting*. includes curfew hours that restrict the amount of light that can fall on the window of a habitable room (typically between 11pm and 6am). The Panel notes the Proponent is seeking to have no limitations on operating hours of any uses or activities at the site; however the Proponent's reports indicate façade and sports lighting would typically be turned off at 11pm (unless otherwise approved) (see Appendix P, 4 September 2024, pages 8 and 9).	AS4282 includes curfew and non-curfew times for lighting. Non-curfew is typically up to 11pm. The Lighting Assessment Report 2024 provides that sports lighting would operate at full output during a broadcasted sporting event at night/dusk for the duration of the event and for some time before and after. Lighting at full output may be required during a daytime event (for example, when cloudy). For most concerts and other non-broadcasted events, lighting would not be at full output (approximately 10-20% of full output). For maintenance and setup/pack-up, lighting would operate at a dimmed level (10-20% of full output).

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			Façade lighting would operate prior to, during and following events. As part of the detailed design process, and in conjunction with relevant agencies, restrictions can be set. This can be appropriately mandated through a condition of approval.

H6. Wind effects

Summary and key facts

72. The assessments of wind effects within and around the stadium comprised:

    (a) an analysis of regional wind climate;[56] and

    (a) a wind tunnel study, which involved assessing wind velocity changes as a result of the stadium and the influence of the surrounding buildings. The wind tunnel study took measurements at 41 measuring points around and within the stadium and calculated the specific probability of exceedance of wind speeds at these locations. The measure points comprise 13 outside locations, two locations on the playing field, 8 locations on the lower tier, 9 locations on the Level 1 concourse and 9 locations on the upper tier.

73. These assessments concluded that in most cases, the proposed buildings within the Project area result in similar or improved pedestrian comfort conditions compared to not having the buildings and wind comfort is expected to be good within the stadium. The Project is able to satisfy accepted wind safety and comfort criteria provided a condition of any approval requires the final design to be subject to a wind assessment. Such a condition is usual for major project approvals which involve acceptance testing of the final detailed design.

74. Further, wind comfort levels surrounding the stadium would be further improved through incorporating shelter elements (for example, shade structure and suitable planting) at appropriate locations. These measures would be addressed through the detailed design process required by the conditions proposed by the Proponent.

[56] Ellerslie Road (EMO 949700) in Annexure C: AECOM Australia response on Wind (4 March 2025) and Ellerslie Road (EMO 949700) and Hobart Airport (WMO 949750), located 1.3km southwest and 15km northwest of the stadium respectively in Appendix O: Wind Comfort Assessment for Visitors and the Precinct Area prepared by Wackner Ingenieure (21 August 2024).

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p 116, [8.7]	The wind comfort levels for sitting at the 'Aboriginal Culturally Informed Zone', southern plaza, and bus plaza are expected to be poor. This will impact the overall use and enjoyment of these spaces.	Annexure C: AECOM Australia response on Wind (4 March 2025) assesses the wind safety and comfort levels within and around the stadium. The wind comfort and safety criteria are used to assess how wind affects people in outdoor spaces. The comfort criteria are based on a five point scale which measures comfort level based on wind speed having regard to the different uses (ie traversing, strolling and sitting). Quality class 1 represents the highest level of comfort and quality class 5 represents the lowest level of comfort. Safety criteria address stronger winds that can cause instability or hazards, such as gusts above 60–70 km/h, which may pose risks to pedestrians. Annexure C: AECOM Australia response on Wind (4 March 2025) demonstrates that: • inside the stadium, the highest wind comfort class is achieved at all measuring points within the lower and upper tiers; • the northeastern edge of the Level 1 concourse may occasionally be subject to a wind comfort class 2, which is suitable for waiting areas and parks; • outside the stadium, the wind comfort criteria class ranges between 2 to 4 in summer and winter. According to the Wind Comfort Criteria Matrix, wind comfort class 3 is suitable for shopping and entrance areas and wind comfort class 4 for is suitable for use for sidewalks; and • the comfort level of the areas outside the stadium can be improved through appropriate landscaping and shelter elements. Importantly, the model does not indicate any wind safety concern. The level of wind comfort is good within the stadium and, outside the stadium, the wind comfort level is improved or no worse than the level currently experienced at the Project Site.
2.	p116, [8.7]	It is unlikely that shelter elements could improve wind conditions.	Refer to comment above.
3.	p116, [8.7]	The Draft IAR raises concern with the 'generalised' information provided in the POSS Submission.	The POSS Submission and RFI Material comprise Chapter 7.1 of the POSS Summary Report, Appendix O of the POSS Submission - Wind Comfort Assessment for Visitors and the Precinct Area dated 21 August

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			2024 prepared by Wackner Ingenieure and Annexure C to the RFI response submitted on 4 March 2025 – AECOM Australia response on Wind (4 March 2025). Appendix O and Annexure C are based on the design of the Project at proposal stage. This is reasonable in the context of a major project which is of significance to the State. Through conditions, the findings in these reports will be tested and any necessary design changes can be made to improve comfort levels. This approach is achieved through the condition in Appendix 2.0 of the POSS Summary Report.

Other matters not considered in the Draft IAR

75. In considering wind effects, the Draft IAR did not acknowledge that:

(a) there are no wind safety concerns in relation to the Project;

(b) the comfort level within the stadium is good; and

(c) as well as wind conditions and the intended activity, other factors outside the scope of a wind assessment affect comfort levels including temperature, humidity, solar radiation and clothing.

76. The Draft IAR makes no reference to the draft conditions which propose to require development plans incorporating the recommendations of a wind assessment undertaken during the detailed design phase to be approved by the relevant Minister prior the commencement of development.[57]

[57] Draft condition 2.2.6 (Summary Report p 251-252).

H7. Geotechnical matters

Summary and key facts

77. A comprehensive geotechnical investigation has been conducted to assess ground conditions at the Project Site, involving analysis of existing subsurface data from over 700 borehole investigations carried out within the last 9 years as well as recent vertical borehole drilling, Cone Penetration Testing and Dilatometer testing and a targeted sampling regime. The data obtained from these investigations has been used to create a 3D model of the geotechnical characteristics of the Project Site. These comprise a mix of fill, estuarine and alluvium soil and dolerite rock. Design recommendations for foundational works are set out in Chapter 10.3.3 of the POSS Submission.

78. Geotechnical matters are covered in:

    (a) Chapter 10 of the Summary Report;

    (b) Attachment II – Geotechnical Factual Report; and

    (c) Appendix X – Geotechnical Interpretive Report.

79. The extensive work undertaken to date will inform the detailed design and construction of the development of the Project and wider precinct. The geotechnical recommendations are in the application material are appropriately achieved through conditions of approval.

Issues considered in Draft IAR

80. The Draft IAR raised no concerns with the geotechnical assessment of the Project.

Other matters not considered in Draft IAR

81. As stated above, the Draft IAR did not express any concerns with the geotechnical assessment of the Project. The work undertaken to date demonstrates that the geotechnical conditions of the Project Site are suitable for construction with implementation of the recommendations via conditions of approval.

I. Natural Values & Climate Change

Summary and key facts

82. A comprehensive natural values assessment has been conducted to assess the biodiversity and ecosystems impacts of the Project as well as the Project Site's surrounding hydrology and ecology.

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p109, [8.3(m)]	The Panel further considers that if the stormwater discharge targets are not likely to be met, there may be an increased risk to impacts on the marine ecology of Timtumili Minanya/River Derwent.	An assessment of marine natural values was undertaken by Marine Solutions Tasmania Pty Ltd on behalf of North Barker Ecosystem Services and included in Appendix R – Natural Values Assessment at Attachment A (page 64). This assessment included an *Environment Protection and Biodiversity Conservation Act 1999* Protected Matters Search Tool, and a Natural Values Atlas Assessment through the *Threatened Species Protection Act 1995*. The Natural Values Atlas and EPBC Protected Matters Search Tool identified one threatened marine ecological community and 21 threatened marine species as possibly occurring in the area or known to occur in the area. The results of this assessment indicated that the Project poses minimal risk to threatened and vulnerable marine mammals, turtles, fish and elasmobranchs and/or marine communities. The assessment recommended that where water construction is to occur, or if runoff is contaminated or likely to contaminate the marine environment, further surveys (e.g. sediment sampling, handfish surveys) will be required. In addition, it recommended that environmental management of water works should be aimed at contaminated stormwater runoff control, sediment sampling of areas in proximity to construction and a targeted search for threatened species within the subtidal area and noise pollution control. A stormwater management plan is proposed as a condition. No water construction is proposed. Otherwise, these are matters which can be managed via conditions, as has been proposed by the Proponent.

83. The Draft IAR raised no concerns related to climate change.

Other matters not considered in Draft IAR

84. In discussing natural values matters, the Draft IAR did not acknowledge that Appendix R - Natural Values Assessment had:

(a) found the Project Area to be heavily disturbed and covered completely by the modified land community extra-urban miscellaneous;

(b) there are no signs and / or presence of threatened flora or fauna within the Project area;

(c) the Project will not conflict with the objectives of the *Nature Conservation Act 2002* (Tas);

(d) the collision risk for birds is to be considered relatively low given that the proposed design will contain high volumes of visual obstruction;

(e) impacts to marine values are not anticipated, provided recommended further surveys are undertaken if water works are required for any aspect of the proposal;

(f) no action is required under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) as to impacts to matters of national environmental significance, nor is action required under the *Threatened Species Protection Act 1995* (Tas) or the *Nature Conservation Act 2002* (Tas); and

(g) the Project can meet the requirements of the relevant code overlays under the Hobart Draft Local Provisions Schedule of the Tasmanian Planning Scheme, noting that compliance with these requirements is not a strict requirement as a result of section 19 of the *State Policies and Projects Act 1993* (Tas).

85. In discussing climate change matters, the Draft IAR did not:

(a) address the desktop assessment undertaken to develop a better understanding of the current temperature profile of the Site and of the projected future impacts to the Site from changes to the climate; and

(b) consider the strategies incorporated into the Project to address the impacts of climate change, including:

(i) the implementation of measures to reduce the urban heat island effect and improve energy efficiency; and

(ii) design features to enhance resilience to future climate change impacts such as increased rainfall and sea level rise.

J. Construction program and sequencing

Summary and key facts

86. It is proposed that construction of the Project be managed in accordance with a CEMP, as an important part of the broader environmental management framework established by the conditions of approval as proposed in the Summary Submission, consistent with best practice for major projects.

87. Specific impacts, such as noise during the construction phase, are the subject of specific recommendations in documents provided with the POSS Submission and in response to the Commission's RFIs. They are reflected in, and can be expected to be implemented through, the preparation of the CEMP.

88. The Project Site has been subject to extensive investigations and remediation, addressing the historical legacy of contamination. This is considered and addressed in the section addressing contamination.

Issues considered in Draft IAR

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
1.	p117, [9.0(a), (b)]	The Panel does not have access to information on the construction program or time periods associated with the Project, or even the more restricted scope of the Proponent's proposed stadium project.	It is anticipated that construction would occur over up to 42 months. Activities during that indicative period, and indicative schedules for them, are provided in POSS Submission including the CEMP. All timeframes presented in application material are indicative, as they must be at the present stage of Project development and design where approval and procurement has not yet been completed. It would be unusual, for a project's construction program to be fixed prior to the grant of necessary approvals, or for a project to be assessed on the basis of a certain, fixed construction program. The construction methodology that will be utilised to construct the Project (including the timeline for construction) will be determined in consultation with the contractor who is appointed to construct the Project. It cannot be specified at this point as that will reduce the value-for-money outcomes that can be obtained through a competitive bidding process. The Proponent has provided sufficient information through the POSS Submission, the RFI Responses and the Proponent's Representations to support a project assessment for the project to proceed to procurement and further refine construction planning and arrangements.

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment
			In addition, the Proponent notes that proposed draft condition 4 included in Appendix 2.0 to the POSS Summary Report requires the preparation and implementation of a CEMP, which must address a range of specific matters and contain sub-plans relevant to noise and vibration, air quality, soil management, water quality and water management, pedestrian and traffic management, acid sulphate soil management, historical heritage and Aboriginal cultural heritage.[58] The requirement to complete a CEMP as a condition of approval when a construction contractor is appointed and can provide an appropriate level of detail is an appropriate approach to planning and approval at this stage of the Project.
2.	p117-118, [9.0(c), [9.0(i)]]	There is a range of related stadium sub-projects and other construction projects in the area that may affect the timing and sequence of construction activities and the potential for cumulative effects arising from the project.	It is not clear what the sub-projects are that are being referred to. To the extent they are part of the Project, they would not be cumulative. Rather, in contrast to potential development scenarios which might involve any number of discrete, smaller-scale projects or sub-projects, the singular nature of the Project and the process of its integrated assessment mean there is an opportunity to ensure construction related effects are managed in an integrated fashion. It is proposed that construction of the Project be managed in accordance with a CEMP, as one piece of the broader environmental management framework, consistent with best practice for major projects. To the extent they are separate to the Project, it is appropriate that regard is had to other planned and existing construction activity in the vicinity of the Project at the time the CEMP is prepared, in the interests of both managing cumulative or interrelated effects and (as relevant to the delivery of the Project, rather than issues within scope of the integrated assessment per se) to achieve efficiencies in Project construction management.
3.	p118, [9.0(j)]	The Panel notes that the uncertainty of the construction program and staging poses significant time and cost risks to the delivery of the Project.	These risks exist in the context of any major project. As with all such projects, the Project will need a construction program, and appropriate contractual management. This is developed to an appropriate extent for this stage of the Project. The risks to be managed through those processes are not relevant to issues within the scope of the integrated assessment under the SPP Act.

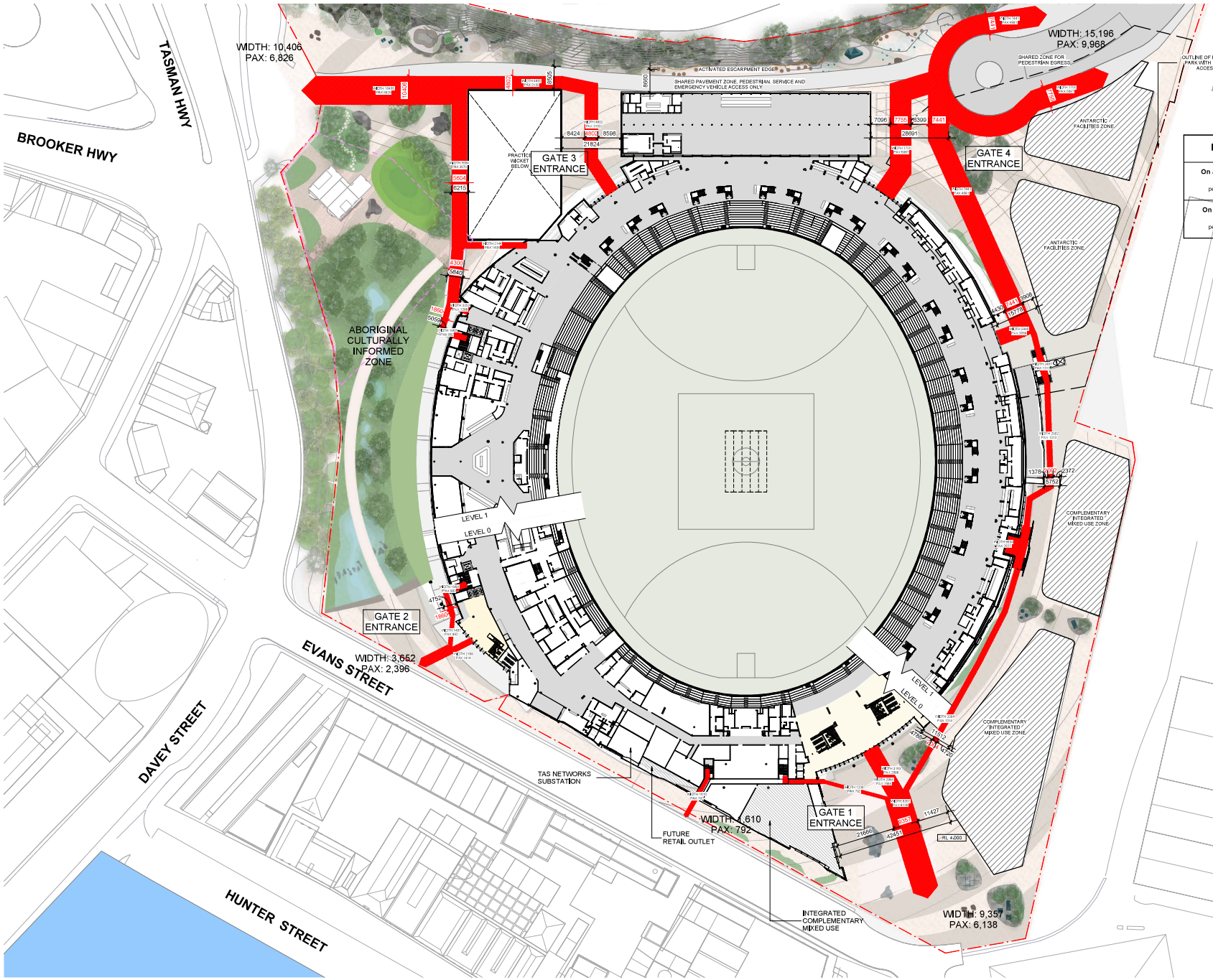
[58] Draft condition 4 (Summary Report pp 253-254).

No.	Draft IAR Reference	Draft IAR issue/finding	Proponent's comment

Other matters not considered in Draft IAR

89. Although the Draft IAR addresses the draft construction management plan provided at Appendix AA of the POSS Submission, it does not address the how these matters could be dealt with through conditions, or offer any comment on the proposed conditions that were attached to the POSS Submission to appropriately regulate these issues.

ATTACHMENT 2 TO REPRESENTATION 3



AFL MODE

TOTAL EGRESS COUNT:
23,000 SEATS
+ 1,500 STANDING
+ 120 AFL MEDIA
+ 1,500 STAFF

INSIDE BUILDING ENVELOPE
STEPPED WIDTH = CAPACITY/66/6min
ONE LEVEL EXIT WIDTH = CAPACITY/82/6min

OUTSIDE BUILDING ENVELOPE
STEPPED WIDTH = CAPACITY/66/8min
ONE LEVEL EXIT WIDTH = CAPACITY/82/8min

FLOW RATE	TRAVEL TIME
On a stepped surface 66 persons per metre per minute	**Low fire risk** 8 minutes
On one level surface 82 persons per metre per minute	**Medium fire risk** 6 minutes

Rev	Description	By	Date
P1	PRELIMINARY INFORMATION		10.05.2024

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Zone

Client
Macquarie Point Development Corporation

Project No.
322070.00

Project
MACQUARIE POINT MULTIPURPOSE STADIUM
41 Evans St, Hobart TAS 7000

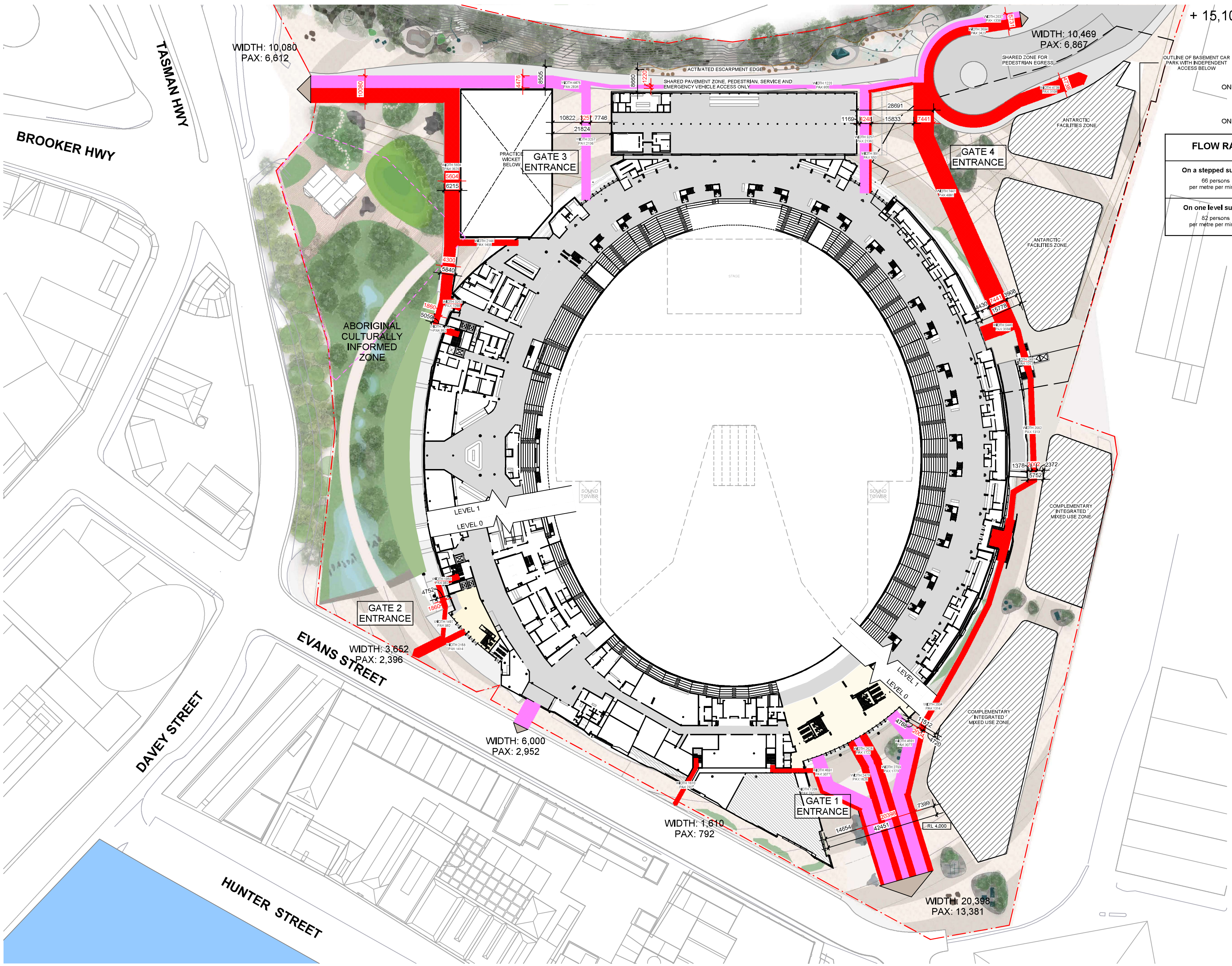
Acknowledgement
The Stadium Team acknowledge the traditional owners of this land, the Muwinina people, and pay respect to those that have passed before us. We acknowledge today's Tasmanian Aboriginal community, their Elders, and their enduring custodianship of Lutruwita/Tasmania.

Drawing Title
GROUND PLANE - EXTERNAL CONCOURSE PLAN MODAL SPLIT AFL

Document Control Status:
Emergency egress AFL mode

Co-ordinated: SJ
Drawn: AC
Project Designer: AR/SH
Scale: 1 : 500 @ A0
Project Director: AR/SH
Revision Date: 02.05.2025
Drawing Number: MPMS-CXC-DR-01-A18-0000
Revision: L1

CONCERT MODE
TOTAL EGRESS COUNT:
16,400 BOWL PAX
+ 15,100 PITCH STANDING
+ 1,500 STAFF



INSIDE BUILDING ENVELOPE
STEPPED WIDTH = CAPACITY/66/6min
ONE LEVEL EXIT WIDTH = CAPACITY/82/6min

OUTSIDE BUILDING ENVELOPE
STEPPED WIDTH = CAPACITY/66/8min
ONE LEVEL EXIT WIDTH = CAPACITY/82/8min

FLOW RATE	TRAVEL TIME
On a stepped surface 66 persons per metre per minute	**Low fire risk** 8 minutes
On one level surface 82 persons per metre per minute	**Medium fire risk** 6 minutes

Scale 1:500
0 5m 10m 25m 50m

Rev	Description	By	Date
P1	ISSUED FOR INFORMATION		02.05.2025

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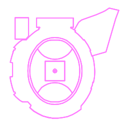
Scale

Zone



Client: Macquarie Point Development Corporation

Project No.: 322070.00

Project: MACQUARIE POINT MULTIPURPOSE STADIUM
41 Evans St, Hobart TAS 7000

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Drawing Title: GROUND PLANE - EXTERNAL CONCOURSE PLAN MODAL SPLIT CONCERT

Document Control Status: Emergency egress concert mode

Co-ordinated: MM	Drawn: AC
Project Designer: AR/SH	Scale: 1 : 500 @ A0
Project Director: AR/SH	Revision Date: 02.05.2025
Drawing Number: MPMS-CXC-DR-01-A18-0001	Revision: L1

PLOT STAMP DATE: 8/05/2025 4:25:53 PM