



24 November 2023

Simon Scott
Committee Secretary
Parliamentary Standing Committee of Public Accounts
Parliament House
Hobart TAS 7000

Dear Mr Scott,

Re: Inquiry into Tasmanian Government's process into the proposed Arts, Entertainment and Sports Precinct in Hobart

I am writing to detail the Tasmanian Symphony Orchestra response to the above inquiry. The TSO is an interested and acoustically sensitive receiver of the proposed project, with significant business interests adjoining the Macquarie Point site.

This submission is most relevant to items 2 and 6 of the Inquiry terms of reference:

- *The suitability of Macquarie Point as the site for a proposed Arts, Entertainment and Sports Precinct and*
- *Any other matter incidental thereto.*

The Tasmanian Symphony Orchestra is a Tasmanian icon that has served the Tasmanian community and represented Tasmanian arts and culture nationally and internationally for the last 75 years. The company generates direct revenues of \$3 million, directly employs 218 people and attracts audiences of 31,200 each year.

Today the orchestra occupies premises on the Macquarie, Evans St, Davey Street block. Our leasehold includes the TSO Recording, Film and Rehearsal Studio on Evans St, the Australian Broadcasting Corporation recording studio, and TSO administration offices. We activate these premises 7 days and 6 nights per week. Additionally we utilise Federation Concert Hall on more than 30 concert occasions per year and 60 rehearsal days, and we access the Evans Street loading dock seven days per week.

In the last two years, the Tasmanian Symphony Orchestra has invested \$1.3 million in the acoustic upgrade of Federation Concert Hall and the installation of digital infrastructure in the hall and TSO Studio to create world-class performance, recording, and filming venues for the state of Tasmania.

These premises now promise the highest quality performance, recording and audience experience across all music genres as well as every other purpose the venue supports.

With this infrastructure in place, TSO has amplified its physical presence by livestreaming 16 full orchestra concerts per year, supplementing the digital content we produce weekly in the TSO Studio. All of this has been achievable through careful investment and the management of our environment. The protection of this investment and asset, and the experience of all audiences and artists who use it, is of **utmost importance**. This protection has material economic consequences for the TSO, and its continued creation of economic, social, and cultural value for our island.

Our concerns as to the suitability of Macquarie Point as the proposed site of this development are:

- Acoustic impact on Federation Concert Hall, TSO Recording, Film and Rehearsal Studio and ABC Recording Studio
- Noise during construction and operation
- Loss of amenity during construction and operation
- Degraded customer experience during construction and operation
- General amenity post-construction including visual impact on existing cultural assets and the waterfront's "maritime heritage"
- Traffic flow, parking, and impact of road closures on access to Federation Hall

Following this letter is the detail of our submission which has been completed by TSO's long-standing acoustic consultant, Andrew Nicol, of AEN Advisory.

Thank you for the opportunity to provide a submission to the inquiry. Please don't hesitate to be in touch if I can provide any further context or information for the committee. I can be contacted on [REDACTED] or by email [REDACTED]

Yours sincerely,



Caroline Sharpen
CEO

Proposed Arts, Entertainment and Sports Precinct in Hobart

Representation – Submission to Parliamentary Standing Committee of Public Accounts

1. Introduction

This submission has been prepared by A.E.N. Advisory and Design Services Pty Ltd (AEN Advisory) on behalf of the Tasmanian Symphony Orchestra Pty Ltd (TSO).

AEN Advisory has been engaged by the Tasmanian Symphony Orchestra to act in a technical advisory capacity in making the following representation to the *Parliamentary Standing Committee of Public Accounts*. In making this submission, the TSO has expressed their intent to seek a collaborative outcome which remains supportive of the intent to locate a stadium within the Hobart CBD yet provides the necessary protection of the TSO's existing assets and business interests.

It is acknowledged that the project has recently been referred as a *Project of State Significance* by the Upper House and as such, it will proceed to the Planning Commission for assessment. It is understood that the Terms of Reference for the Planning Commission have not yet been finalised and as such, this submission is unable to refer to it. This submission does refer to the amended *Parliamentary Standing Committee of Public Accounts* Terms of Reference as detailed in Section 2 below.

2. Invitation for Submission Reference

Following on from the Parliamentary Standing Committee of Public Accounts (Committee) December 2022 resolution to inquire into and report upon the Tasmanian Government's process into the feasibility planning for a new sporting and event stadium in Hobart, the Committee amended its terms of reference on Friday 20th October 2022 and invited written submissions from interested organisations in relation to the Terms of Reference stated in the release.

This submission (by the TSO) responds to items 2 and 6 of the Terms of Reference which are:

2. the suitability of Macquarie Point as the site for a proposed the Arts, Entertainment and Sports Precinct; and
6. any other matter incidental thereto.

The TSO reserves the right to re-consider their submission should the Terms of Reference be further updated.

3. Project of State Significance

It is noted that the project has now been referred as a *Project of State Significance* by the Upper House and will proceed to the Planning Commission for assessment. It is also understood that the Terms of Reference for the Planning Commission (which is understood will set the scope of the inquiry and guide how the process will be conducted) are yet to be finalised.

The TSO supports this direction on the understanding that the matters raised in this submission are addressed in a substantial, suitable and technically meaningful manner, in line with the significance of the concerns raised by this submission.

4. About the Tasmanian Symphony Orchestra and Federation Concert Hall

The Tasmanian Symphony Orchestra (TSO) has been Tasmania's orchestra for over 75 years and TSO is recognised across the island and throughout the world for their artistry and high quality brand and reputation. The TSO is indispensable to the community they serve. Their home and place of work is Federation Concert Hall, located at 1 Davey Street in Hobart's CBD.

The TSO rehearse, perform, record, live stream and sell video on demand services at Federation Concert Hall, a hall that was purpose designed and built for the orchestra (opening in 2000) and subsequently enhanced (acoustically and from a professional recording and live streaming perspective) over the last few years. Their world-class concerts are live broadcast via the Australian Broadcast Corporation (ABC), streamed via an international distribution partnership to screens around the world as well enjoyed by locals and visitors attending their concerts in person.

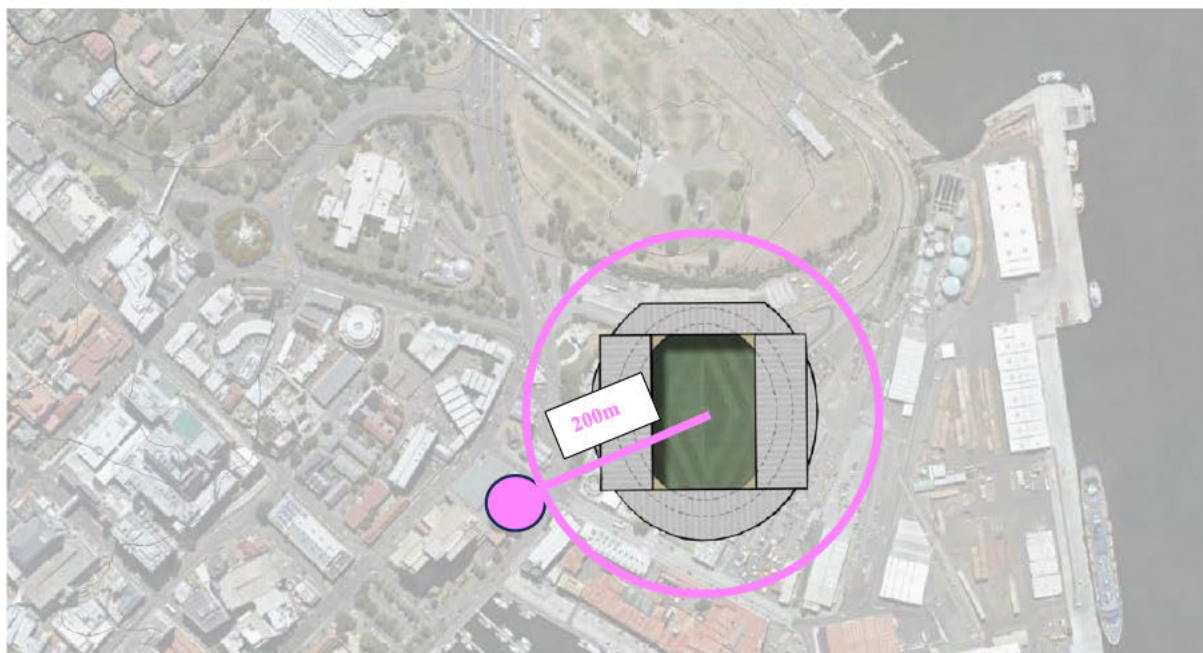
In addition to Federation Concert Hall, the TSO has their Film, Recording and Rehearsal Studio (located on the Evans Street façade) which is used for noise critical activities and similar uses to those described above. Also, the ABC Recording Booth (which is also part of TSO's Leasehold) is located within the building and is used for highly critical recording and live stream events, broadcast nationally and internationally.

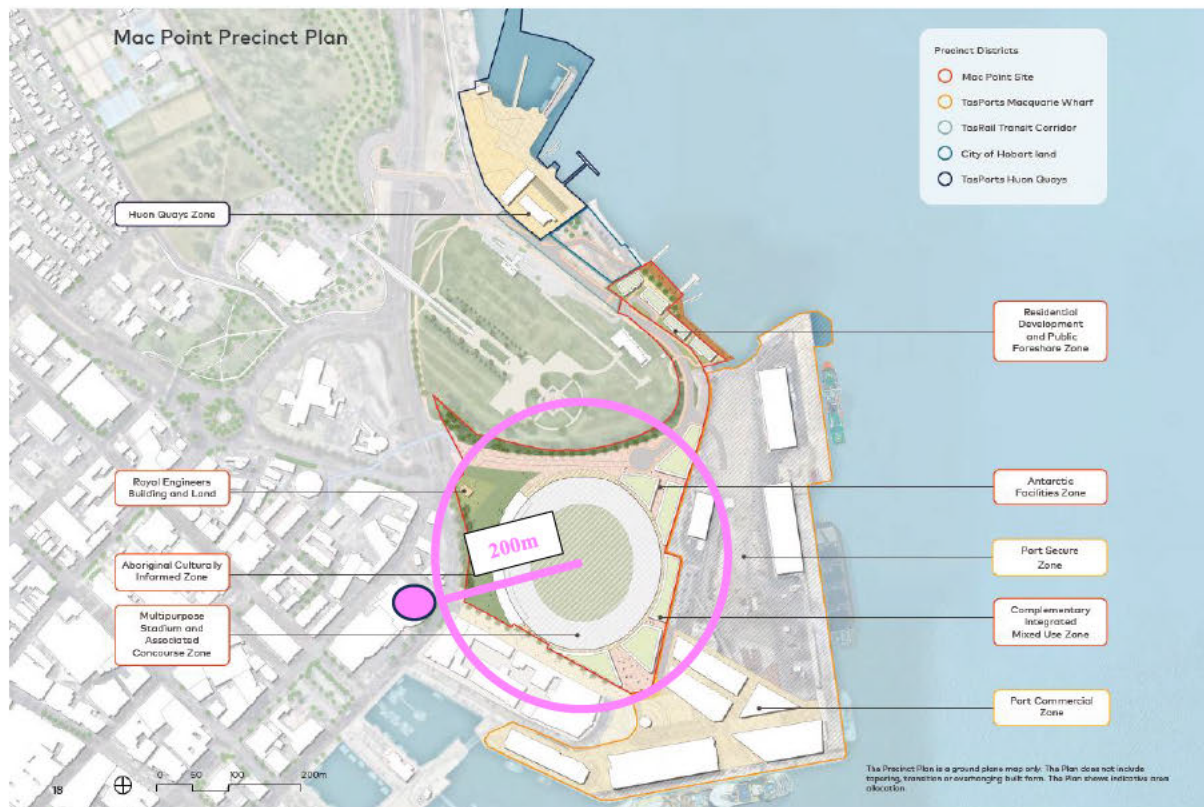
5. Context and Relative Location

Two publicly available documents that have been used to inform this submission are:

1. Hobart Stadium – Site Selection Process, prepared by MCS Management Consultants with PhilipLighton Architects, dated 25th February 2022; and
2. Mac Point Draft Precinct Plan, prepared by the Macquarie Point Development Corporation, working with Cox Architecture, dated October 2023.

The plans below, extracted from the above reports show the currently proposed location for the stadium and the close proximity to TSO's Federation Concert Hall, the TSO Studio and the ABC Recording Booth (solid pink circle).





Both reports illustrate how close the stadium is likely to be to Federation Concert Hall and other potential noise sensitive receivers in the area.

6. Preliminary Noise Impact Assessment

The proposed stadium (part of the arts, entertainment and sports precinct) is assumed to be used for a range of sporting events, live concerts and other entertainment events, in line with the preliminary business case submitted to the Government (also publicly available). The nature of these events are that they are “noise events” that have the potential to generate very high levels of environmental noise in the vicinity. The reports and preliminary information released to the public, does not provide any technical detail around this, however, based on projects with similar uses and similar proximity (of the stadium to the nearby noise sensitive receivers, such as the TSO) environmental noise (and limitation of it) should be one of the key considerations by the development.

Federation Concert Hall is approximately 200m from the centre of the stadium (which will have a noise radiating surface (either a roof or the open area of the oval) of approximately 100 to 150m (diameter). This means that the attenuation (due to distance and other technical considerations) from stadium to noise sensitive receivers (such as Federation Concert Hall) will be minimal and therefore surrounding buildings’ facades (envelopes) are likely be exposed to similar noise levels to those radiating from the exterior of the stadium. Unless significantly controlled (especially at low frequency) the noise radiating from the stadium roof (or opening) is likely to be much higher than the levels that the envelope of Federation Concert Hall was designed to withstand. Consequently, noise would break-in to the concert hall and disrupt its uses, assuming they occur concurrently, which is to be expected based on TSO programming and the anticipated uses of the stadium.

The TSO acknowledges that it is potentially too soon to be definitive about what the actual impacts would be on them (in terms of noise) but would argue that it is one of the key considerations (under item 2 of the Terms of Reference) that should be considered prior to formally proceeding with the project in this location.

In the timeframe available, the TSO has not been able to engage the necessary team of experts to provide evidence to substantiate these noise concerns (which are expanded on in Section 7) but there are broader concerns about the development location (in addition to the environmental noise) which are of significance to the TSO that require significant technical consideration prior to proceeding with this location, again under item 2 of the Terms of Reference.

7. Summary of the TSO's Concerns

The TSO has expressed concerns about the development and the proposed location. While it is acknowledged that some of these issues will be addressed via the planning considerations process, the TSO has expressed their desire for them to be noted within this submission so that they can be addressed and not overlooked. The other technical concerns are raised under item 2 of the Terms of Reference.

Items under item 2 of the Terms of Reference

Noise from the stadium (concert events, entertainment events, sirens, and sports activity noise). The TSO (and their different facilities described in Section 4) will be impacted to a greater or lesser degree (depending on the proximity to the stadium and the surrounding areas of the stadium as well as the acoustic design of the facility itself). With limited information submitted at this stage, a full technical evaluation has not been completed on this issue but precedent evidence and the experience of the author both suggest that this is a matter for detailed consideration and review and is of real concern to the TSO. *The impact of unwanted noise (from the development) intruding into the TSO's existing buildings and disrupting their ability to use them is a real concern.*

Impact on car-parking (for their customers). Anecdotal evidence (by the TSO) notes that there are already stresses on the availability of car-parking servicing their facilities with the current activities in and around the area. The consequence of additional activity in the close vicinity due to the proposed development is likely to put further pressure on the carparking capacity and the TSO's concerns are that their patrons will miss out on parking and not be able to get to their events. *The consequential loss of revenue and patronage is a concern to the TSO.*

Planning Considerations

Construction noise. Similar to the above item on noise, the potential noise (and vibration) from construction activities disrupting the TSO's existing facilities and operations is a genuine concern. ***Planning approvals will require the development to put in place (and manage) a stringent noise and vibration construction management plan to prevent unwanted disruption to the TSO's facilities. This will need to demonstrate that there is no loss of current use capability to the TSO.***

Impact on access to their facilities due to road closures (especially Evans Street). Similar to the above item on car-parking, the TSO relies on access to their facilities to load and unload as well as for their patrons to attend the facilities. ***Planning approvals will require the development to put in place (and manage) a stringent traffic management plan that allows the current facilities to operate without loss of access (and amenity) to prevent unwanted disruption to the TSO's facilities.***

8. Environmental Noise Policy

The current (existing) environmental noise policies (noise pollution control regulations) in Tasmania are not robust enough to address the noise control requirements for such a development built within the surroundings of a number of noise sensitive businesses (and local residents). This is not uncommon and there are precedents within the region where noise policy has been amended or even introduced to address the shortfalls of existing policy (for example Docklands in Melbourne), Sydney (Football Arenas) and Eden Park in Auckland.

The State Government of Victoria introduced noise policy that imposed requirements on new developments in the area around the Docklands Stadium to control noise into the new premises as well as controlling (and limiting) environmental noise from the stadium activity (noise level and frequency of events). In this context, where new development is built around an existing stadium, this approach can be adopted but reliance is needed on protecting existing businesses (in and around a site for such a stadium development).

It is the TSO's view that the State Government should be lobbied and encouraged to introduce suitable environmental noise policy/policies to protect the existing businesses in and around the vicinity of the development (specifically their business) in order to protect them from future development and use. This must be developed and put in place prior to any planning approval process is progressed.

The TSO recommend that a detailed (independent) technical environmental noise impact assessment of the development should be undertaken at this stage to assess the feasibility of the development, given the nature of the TSO's existing facilities and their sensitivity to noise (as outlined above). The TSO wish to be consulted in this process and will also engage their own independent assessment.

It is the TSO's view that the State Government should be lobbied and encourage the restriction of frequency of event use, noise level and other noise emissions from the development (prior to the planning application process) in order to ensure that the existing facilities interests are protected but also to ensure that the intended uses of the development are not overly restricted to make the facility a financial risk to the State Government due to any restrictions that may need to be imposed (that have already been assumed in the business case).

9. Recommendations

The TSO's concerns are such that further, more detailed, technical submissions are needed to protect the interests of the TSO. The TSO's recommendation is that (through this Commission) there should be a request to implement suitable environmental noise policies and use (type and frequency of) restrictions, to protect the interests of the TSO (and others who may join at a point in the future) and that a thorough technical assessment is made, prior to any planning process commencing, to inform decisions around item 2 of the Terms of Reference.

The project funds independent expert reports on environmental noise, traffic and urban design to inform the decisions of the Commission and prior to the Planning Commission assessment of the site (and the Terms of Reference for the Commission).

The project provides a technical acoustic report that informs the Commission on the anticipated noise egress from the stadium (level, duration, frequency etc) that allows an independent assessment of the impact on Federation Concert Hall (and other sensitive receivers). This assessment should be undertaken prior to any decisions being made as to the suitability of the site (under item 2 of the Terms of Reference).

Date of Document

23rd November 2023

Contact Details

Andrew Nicol
Founding Director
A.E.N. Advisory and Design Services Pty Ltd

PO Box 41, Glen Iris, VIC 3146, Australia
E | andrew@aenadvisory.com
M | +61 407 880 646

ABN 19 615 104 865