

Department of State Growth

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Ms Anne Cunningham
Chair, Development Assessment Panel
New Bridgewater Bridge Major Project
Tasmanian Planning Commission
Level 3, 144 Macquarie Street
Hobart TAS 7001

By email: tpc@planning.tas.gov.au

New Bridgewater Bridge Major Project – Further information to the Proponents representation on the Initial Assessment Report

Dear Ms Cunningham,

Thank you for the Development Assessment Panel's invitation to make written submissions in relation to the representations received during the exhibition period.

The Proponent intends to provide a written submission in relation to the representations made by other parties by close of business Thursday 10 March 2022.

However, the Proponent would also like to take this opportunity to make a written submission in relation to its representation, to provide additional information recently obtained in relation to the timing and cost of the air quality monitoring proposed to be required in the draft Permit conditions.

It is noted that the Proponent has previously and continues to query the reasoning for the monitoring of vehicle emissions for a replacement project for an existing infrastructure asset. The Project will not increase traffic demand. The Proponent maintains the view that such conditions are onerous, especially in light of air emission modelling demonstrating that the existing vehicle emissions will reduce over time.

The civil/road works at either end of the bridge are of a scale similar to highway projects routinely undertaken throughout Tasmania, without the requirement for vehicle emission air quality monitoring. The pile installation and bridge assembly will generate emissions similar to building projects routinely undertaken throughout Tasmania, without the requirement for vehicle emission air quality monitoring. The Proponent does not contend the requirement for dust monitoring and management during construction, acknowledging that civil works of this scale are likely to generate dust that will require management throughout the construction phase. Furthermore, the Proponent does not contend the requirement for a monitoring program for water quality in the River Derwent because of the proposed works and the potential impact on water quality, something expected for a large project with a lot of works in an aquatic environment. It is the value of an extensive monitoring program for vehicle emission air quality for an existing road that the Proponent questions.

As advised in the Proponent's representation, the program of monitoring required by the draft conditions will result in the expensive production of information that has no relevance to the project being assessed and may result in delays of up to 12 months. In terms of cost, the program of monitoring required by the draft conditions has been priced to cost between \$850 000.00 and \$1 000 000.00 (excluding GST).

Despite the Proponent continuing to contest the requirement for the monitoring, to minimise the risk of delays to the assessment process delaying the Project, the Proponent made the commitment within its Major Project Impact Statement as follows.

Commitment 32	An air quality monitoring program to measure oxides of nitrogen and particulates (PM ₁₀ and PM _{2.5}) in accordance with relevant Australian standards will be established prior to construction and operate for three months pre-construction, six months during construction and six months post construction. The monitoring program will involve one referenced air quality monitoring station to be installed within the Project Land.
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Although this commitment requires significant expenditure of public money for questionable value, the three months pre-construction monitoring would be able to be delivered without significant delays to the Project, noting that significant delays to the Project will result in far greater costs. However, the draft Permit conditions require 12 months of monitoring (with a minimum of six months) prior to construction phase commencement, and this will result in a substantial delay to the project (three to nine months).

As soon as practicable after the appointment of the successful design and construction tenderer, the Project commenced the procurement of the design and construction of the air monitoring system, including but not limited to:

- 1x Australian Standards Compliant NOX, Meteorological, PM₁₀ & PM_{2.5} Air Quality Monitoring Station
- Installation and commissioning on site in Tasmania
- Operations and maintenance for four years
- Consumables for four years
- NATA accredited data validation and reporting services for 4 years
- Real-time access to the air monitoring and meteorological measurement data collected at the monitoring station
- Decommissioning of the station

Attachment A contains a photograph of a similar system installed interstate for illustrative purposes.

Until the Panel's initial assessment report was released on 19 January 2022, the Proponent was not aware of the potential requirement for 12 months of monitoring (with a minimum of 6 months) prior to construction phase commencement.

Due to the lead time for the manufacture of the specialist equipment, and subject to the construction of the required monitoring system compound (i.e. concrete slab, fence, building etc.) being interpreted as being exempt from requiring a Permit or is approved by the Panel to be undertaken in advance of the Panel's determination of the Permit, then the earliest possible commencement of monitoring would be the end of May 2022. This leaves only three months before 'construction phase commencement' is scheduled at the end of August 2022.

If the Panel's determination of the Permit is required before commencement of construction of the required monitoring system compound, and subject to there being no further associated approvals being required, then mid to late July would be the earliest possible commencement of monitoring. In this case, the term 'construction phase commencement' would need to be replaced with 'significant emitting activities' as proposed in the Proponent's representation, if three months of monitoring is to be completed before 'significant emitting activities' commence in November 2022.

The project welcomes any queries from the Commission or the Panel in order to clarify the above matters and would be glad to meet and discuss further. If you wish to discuss our response, please contact Mia Potter, Manager Approvals, New Bridgewater Bridge Project at Mia.Potter@stategrowth.tas.gov.au or on 03 6166 4860.

Yours Sincerely,



Ben Moloney
Project Director, New Bridgewater Bridge Project, Department of State Growth

04 March 2022

Attachment A - Photograph of a similar system installed interstate for illustrative purposes

