

Tasmanian Heritage Council submission - Department of State Growth representation - 10 March 2022

[Relevant extracts from the representation copied below with THC comments in red]

4.8 Flood-prone areas

Proponent Response

		<p>The Panel further notes that impacts of flooding on registered heritage places has not been identified in the MPIS response to Tasmanian Heritage Council requirements, in particular:</p> <ul style="list-style-type: none"> - while not discussed in the flood hazard report, there appears to be an increase in the extent of the H5 flood hazard category on Former Black Snake Inn property. Where the H5 category is identified as unsafe for vehicles and people, all buildings vulnerable to structural damage, some less robust building types vulnerable to failure; - it is unclear if there is an increased risk from flood to any matters of cultural heritage significance for the Former Black Snake Inn; and - there is increase in flood extent over the Watch House (1 Lyell Highway, Granton). 	<p>The Proponent is not aware of what requirement the Panel is referring to regarding not providing a response to the Tasmanian Heritage Council requirements on flooding. In consultation with Heritage Tasmania, they indicated that they made no such request. Further, there is no requirement in the Assessment Criteria to address flooding specifically for registered heritage places.</p> <p>Nonetheless, regarding the risk, responses to each of the identified areas are provided, below.</p> <p><i>while not discussed in the flood hazard report, there appears to be an increase in the extent of the H5 flood hazard category on Former Black Snake Inn property. Where the H5 category is identified as unsafe for vehicles and people, all buildings vulnerable to structural damage, some less robust building types vulnerable to failure</i></p> <ul style="list-style-type: none"> - The Former Black Snake Inn does have the potential to be impacted subject to the final road design levels and the details for the drainage under the roundabout near the Former Inn. The modelling in the Flood Hazard Report shows some areas increasing and some areas reducing in flood risk, and there is
Comment		Proponent Response	
			<p>overall increase in the area of H5 flood hazard area away from buildings.</p> <p><i>it is unclear if there is an increased risk from flood to any matters of cultural heritage significance for the Former Black Snake Inn; and</i></p> <ul style="list-style-type: none"> - In the Flood Hazard Report there is no change in flood hazard classification for the former Inn building, and at the front of the Former Inn there is a small reduction in H6 area. <p><i>there is increase in flood extent over the Watch House (1 Lyell Highway, Granton)</i></p> <ul style="list-style-type: none"> - As the flood risk near this historic building is close to the proposed road works, the final design levels and cross drainage have the potential to impact flood risk for the buildings. The flood modelling undertaken during detailed design should consider the risks to these buildings and any requirements from the Heritage Council for their protection (noting their existing flood risk next to the river).

THC Comment

The THC confirms that the THC to-date has not included any requirements for consideration of flooding on heritage registered places in relation to the New Brigewater Bridge Major Project.

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		Proponent Response	
5.4	Tasmanian Heritage Council requirements	<p>The Panel considers that the MPIS largely addresses the relevant assessment criteria based on the preliminary condition advice, including advice that the amendments to the MPIS address their information requirements, provided by the Tasmanian Heritage Council (THC).</p> <p>The Panel notes:</p> <ul style="list-style-type: none"> - the extent of the listing for Black Snake Inn remains unclear; and 	<p>The Proponent notes that the extent of the listing for the Black Snake Inn is defined by the Central Plan Register.</p> <p>Further, comments made against Clause 4.8 should be noted here with regard to the impact of flooding.</p>
Comment		Proponent Response	
		<ul style="list-style-type: none"> - increased impacts of flood on registered places have not been considered in the heritage impact statement. 	

THC Comment

The THC confirms that the Tasmanian Heritage Register entry for the Black Snake Inn is a whole of title registration [title reference 246061/1] and that the current listing has entries under criteria (d) and (f). To-date, the THC has not included any requirements for consideration of flooding on heritage registered places in relation to the New Bridgewater Bridge Major Project.

Table 3 - Suggested amendments to the 'conditions and restrictions' – general

Tasmanian Heritage Council	61	<p>Prior to the commencement of construction, provide documentation demonstrating how the following commitments and additional matters are to be implemented, to the satisfaction of the Director, Heritage Tasmania:</p>	<p>As with other comments, the same amendment to reflect 'relevant' construction is suggested.</p> <p>This avoids the requirement to provide all detail up front before any construction commences, even if construction that impact heritage aspects are to occur much later.</p>	<p>Amend part of condition 61 as follows:</p> <p><i>"Prior to the commencement of relevant construction, provide documentation demonstrating how the following commitments and additional matters are to be implemented, to the satisfaction of the Director, Heritage Tasmania."</i></p>
		<p>(a) In relation to the Bridgewater Bridge heritage place:</p> <p>(i) Commitment 47 – The existing causeway and the 1874 and 1893 bridge abutments is to be retained;</p> <p>(ii) Commitment 48 – All excavation and disturbance within</p>	<p>No comment</p>	<p>Nil</p>

THC Comment

The THC acknowledges the complex timeframes for the project and the resultant difficulty for the proponent to meet the strict 'prior to commencement of construction' requirements. The THC suggests that an alternative to this could be for the proponent to establish fixed stages of construction, which are readily definable and clearly understood between parties. These stages could be then described in the conditions as 'prior to the commencement of the

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relevant construction in Stage xx'. The difficulty in tying a condition of approval to 'the commencement of relevant construction' is the inability for all parties to clearly understand what 'relevant' means, as it is a term that is open to interpretation.

Condition		Proponent Comment	Proposed Amendment
	<p>the causeway and Black Snake Inn sites will be monitored by a historical archaeologist in accordance with the Bridgewater Bridge Replacement Archaeological Method Statement prepared by Praxis, November 2021;</p> <p>(iii) Commitment 49 – Protection zones for buildings or structures of heritage significance – The CEMP will include protection zones and vibration management around buildings or structures of heritage significance (for example, the former Black Snake Inn at 650 Main Road, the Watch House at 1 Lyell Highway and historic bridge abutments) to avoid damage to these items during construction;</p> <p>(iv) Commitment 50 – Interpretation for the Bridgewater Bridge crossing will be prepared and located in a publicly accessible location/s in consultation with the Regulator and the three affected councils. The interpretation will include information about the history of the River Derwent crossing, the existing Bridgewater Bridge and the heritage values of the site as illustrated and reflected in Appendix L. All interpretation will be completed and installed within 12 months of the demolition of the existing bridge or as otherwise agreed with the Regulator.</p>		

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Condition		Proponent Comment	Proposed Amendment
	<p>(v) Commitment 51 – Representative samples of the bridge structure will be retained for appropriate re-use and/or interpretation in an appropriate publicly accessible place in the vicinity of the Project Land to the satisfaction of the Regulator.</p>		
	<p>(b) In relation to the former Black Snake Inn and other places on the Tasmanian Heritage Register:</p> <p>(i) Commitment 15 – The former Black Snake Inn building and historic timber outbuilding at 650 Main Road, Granton will be retained;</p> <p>(ii) Commitment 18 – Surface treatments for footpaths and shared paths adjacent to the Watch House and the Black Snake Inn will be specified in consideration of the historic landscape setting of these places;</p> <p>(iii) Commitment 19 If the existing hedge plantings along the Main Road frontage of the Black Snake Inn are removed replacement hedge planting will be included in the landscaping plan;</p> <p>(iv) Commitment 20 – Landscape plantings adjacent to the Black Snake Inn will be selected to be complementary to the historic cultural heritage setting of that place;</p> <p>(v) Commitment 21 – The construction noise and vibration management plan (CNVMP)</p>	<p>Commitment 15 - it is suggested that a change to this wording be made, per the amendment proposed.</p> <p><u>Reason:</u> The condition of this timber outbuilding is poor and it may not be salvageable.</p> <p>Commitment 21 - it is suggested that 37 Black Snake Road be removed from this requirement as it is proposed to be demolished as part of the project. Refer to other comments to support this.</p>	<p>Amend part of Condition 61 as follows:</p> <p><i>"Commitment 15 – The former Black Snake Inn building at 650 Main Road, Granton will be retained as will the historic timber outbuilding (subject to condition);"</i></p> <p>Delete 'and 37 Black Snake Road' from Condition 61 (b) (v) (i).</p>

THC Comment

The THC acknowledges that the timber outbuilding, which is part of the Black Snake Inn property, is in poor condition and the THC recognises that further detailed investigation will be needed to establish if it feasible to retain and conserve this structure.

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Condition		Proponent Comment	Proposed Amendment
	<p>prepared by a suitably qualified person must be provided, prior to the commencement of construction, and is to include a vibration risk assessment for the following built heritage places within or adjacent to the Project Land:</p> <ul style="list-style-type: none"> a. the Black Snake Inn complex at 650 Main Road, Granton; b. the Granton Watch House, 1 Lyell Highway; c. the Granton Memorial Hall, Forest Road, Granton; d. the Commandant's Cottage, 4 Forest Road; e. 6 Forest Road, Granton; f. 19 Tarrant's Road, Granton; g. St Mary's Anglican Church and Cemetery, 20 Old Main Road, Bridgewater; h. Coronation Hall, 25 Old Main Road, Granton; i. Bridgewater railway station's concrete platform, and 37 Black Snake Road, <p>and apply appropriate criteria to protect structural integrity of places for the approval of the Regulator;</p> <p>(vi) Commitment 26 – Landscaping measures to avoid unreasonable overlooking to 6 Nielsen Esplanade, 8 and 13 Gunn Street, and 4, 6 and 8 Waters Loop on the northern shore at Bridgewater, the Black Snake Inn at 650 Main Road and other properties adjoining the southern interchange at Granton will be</p>		

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Condition		Proponent Comment	Proposed Amendment
	integrated into the final landscaping design in consultation with those property owners to avoid unreasonable overlooking impacts to those properties;		
	<p>(c) Additional matters:</p> <p>(i) Other than where needing to be removed to provide a clear navigation channel, the caissons of the existing Bridgewater Bridge be retained for interpretive purposes;</p> <p>(ii) The lift span of the existing Bridgewater Bridge or other representative section of the bridge be retained and displayed in a public reserve for interpretive purposes;</p> <p>(iii) Information be produced in a range of formats and provided in a public area near the northern abutment of the old Bridgewater Bridge, to assist the public in understanding the history and significance of the place including in particular the welded steel lift-span bridge removed as part of the New Bridgewater Bridge Major Project;</p> <p>(iv) Information be produced in a range of formats and provided in a public area near the southern abutment of the new Bridgewater Bridge, to assist the public in understanding the history and significance of the Black Snake Inn and the causeway as well as nearby heritage places associated with the Bridgewater Bridge (i.e. the watch house, convict quarry</p>	<p>In regard to condition 61 (c) (i) - the Proponent notes the requirement to keep the existing bridge caissons in place except where to provide a clear navigation channel. For the sake of clarity, we wish to confirm the parts of the structure that are considered caissons are reflected in figure 4-1 of The Retention Options Analysis that was Appendix T to the Major Project Impact Statement. There are 4 caisson structures associated with the existing bridge, being the two tower caissons and the southern and northern caissons. All other in-water structures are considered piles (or abutments).</p> <p>In regard to condition 61 (c) (ii) - the Proponent notes that the wording suggested retention of the existing lift span for interpretive purposes. It is suggested that retention of the whole lift span for this purpose is excessive, and it would be better to have a representative section only. Suggested amendment made.</p> <p>In regard to condition 61 (c) (iii) and (iv) - It is suggested that the wording is to prescriptive and that the location and information to be presented for interpretation would be best determined through design and planning to ensure an integrated outcome is achieved. Suggested amendment to wording made.</p> <p>In regard to condition 61 (c) (v) - the Proponent notes the requirement to develop a construction management plan. Noting this is a separate activity to the remaining construction activity, in this case the Proponent suggests that this would be a separate and standalone plan to be prepared.</p>	<p>Amend part of Condition 61 as follows</p> <p><i>"...(ii) A representative section of the existing bridge be retained and displayed in a publicly accessible location for interpretive purposes;"</i></p> <p><i>"...(iii) An Interpretation Plan and Strategy is to be developed and implemented to assist the public in understanding the history and significance of the place including in particular the welded steel lift-span bridge removed as part of the New Bridgewater Bridge Major Project;"</i></p> <p>Delete item (iv).</p>

THC Comment

The THC acknowledges the comments with regards to the existing bridge caissons and clarifies that it is the 4 main caisson structures that are recommended to be retained for interpretative purposes.

Condition 61(c)(ii) – the THC considers that the current wording allows sufficient latitude as it stands, as it includes ‘or other representative section’.

Condition 61(c)(iii) and (iv) – the THC acknowledges the proponent’s comments and would be agreeable to revising these conditions, to ensure that the

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requirements for site interpretation are well-resolved and integrated with the new development. A suggested revised condition could be as follows: 'An interpretation strategy must be prepared for the project land by suitably qualified heritage consultants. The interpretation strategy must include the history and cultural heritage significance of the site and must include interpretation of the existing welded steel lift-span Bridgewater Bridge. The interpretation strategy must be submitted to Heritage Tasmania and must be to the satisfaction of the Works Manager. The endorsed interpretation strategy must be fully implemented within 12 months of the opening of the new bridge.'

Condition		Proponent Comment	Proposed Amendment
	<p>and convict depot); (v) A construction management plan be developed for the Black Snake Inn that ensures the security of the property and protection of its heritage fabric (including archaeology) from unauthorised removal or damage of materials and from incidental damage if the site is used as a laydown area; (vi) The Project Specifications include notification protocols whereby archaeological advice is sought if historical archaeological features or deposits are uncovered during excavation or where doubt exists concerning the historic cultural heritage significance of any materials uncovered during excavations; that provision be made for controlled archaeological excavation to be undertaken when and to a standard consistent with the archaeological advice received; and, that in relation to the Black Snake Inn the Statement of Archaeological Potential (SoAP) and Archaeological Method Statement (AMS) prepared by Praxis Environment be implemented for any works involving impacts to areas identified as having archaeological sensitivity.</p>		

Tasmanian Heritage Council submission - relevant representations - 10 March 2022

The following submission makes comment in response to the following representations:

1. Alan Seath.
2. David Kernke.
3. Garth Marsden.
4. Geoff Lucas.
5. Glenorchy City Council.

Please note that a separate submission has been prepared in relation to the Department of State Growth representation.

1. Representation by Alan Seath.

THC Comment: This representation is focused on traffic movement and access to the new bridge. Of the issues raised, the matter considered to be relevant to the THC is the increased traffic that will be directed along the section of Main Road fronting the Black Snake Inn and along Black Snake Road. Potential roadworks may impact on the setting and frontage of the Black Snake Inn; however, the inn is reasonably set back from the existing road (approximately 9 metres set back from the Main Road front boundary) so there is an existing buffer zone.

2. Representation by David Kernke.

THC Comment: The Black Snake Inn is a place that is listed on the Tasmanian Heritage Register. The THC is working to ensure that the heritage values of the site are appropriately protected and conserved. The proponent has engaged a suitably qualified heritage consultant to provide advice in relation to the heritage listed places that may be impacted by the project, including the Black Snake Inn.

The causeway is a highly significant historic structure that will be conserved as part of the project. It is beyond the remit of the THC to address the described issues with river flow. As for any work that is proposed to a heritage listed place, if a future project was initiated to increase water flow through the causeway then this proposal would be assessed on its merits and with regards to potential heritage impacts.

3. Representation by Garth Marsden

THC Comment: This representation raises various issues, including an issue that is relevant to the THC – the demolition of the existing Bridgewater Bridge. The THC has considered a wide number of options to allow for the retention or part retention of the heritage listed bridge. After carefully weighing up the advice and information that is currently available in the project documentation, the THC recommends that some elements of the bridge must be retained in situ (namely the 4 caissons) and that the ‘lift span of the existing Bridgewater Bridge or other representative section of the bridge be retained and displayed in a public reserve for interpretive purposes’. The THC also recommends that interpretation is included as part of the project, which will explain the history and significance of the existing bridge.

4. Representation by Geoff Lucas

THC Comment: This representation gives some interesting background on the representor’s long-term community involvement with the Bridgewater Bridge replacement and is focused on traffic movement around the bridge and access to the new bridge itself. Among the various issues raised, the matter considered to be relevant to the THC is the increased traffic that will be directed along the section of Main Road fronting the Black Snake Inn and along Black Snake Road (referred to in the representation as Blacksnake Lane). Potential roadworks may impact on the setting and frontage of the Black Snake Inn; however, the inn is reasonably set back from the existing road so there is some existing buffer zone.

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5. Representation by Glenorchy City Council

This detailed representation covers various issues, including heritage matters. The representation provides support to various conditions and restrictions in the *Initial Assessment Report*, but also requests two modifications to the report. The first relates solely to local historic heritage places, so this is not relevant to the THC. The second requests landscaping, noise, and vibration plans ('along the lines of those prescribed by the Tasmanian Heritage Council') be prepared to mitigate adverse impacts to local historic heritage places either in or adjacent to the project land. The THC considers this to be a prudent and reasonable request.