



Resource Planning and Development Commission  
GPO Box 1691  
Hobart TAS 7001

3<sup>rd</sup> floor, 144-148 Macquarie Street  
Hobart TAS 7000

[enquiry.rpdc@justice.tas.gov.au](mailto:enquiry.rpdc@justice.tas.gov.au)

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**Submission from Save Ralphs Bay Inc to the RPDC on the Draft Scope Guidelines for the Integrated Impact Statement (IIS) for the proposed Lauderdale Quay development**

Dear members of the Panel,

Save Ralphs Bay Inc. expresses its appreciation for this opportunity to comment on the Draft Scope Guidelines for the IIS for the proposed Lauderdale Quay development.

We would like to stress at the outset that we are impressed by the comprehensive nature of the draft guidelines, and by the fact that most of the issues that have so concerned Tasmanians in relation to this proposed development have been included.

We congratulate the RPDC on the clarity of the draft guidelines and the overall structure of the document.

We are strongly of the opinion that **all** issues raised in the guidelines are of great importance to the community and to the maintenance of natural and cultural heritage values in Ralphs Bay and connected areas. **Therefore, it is of the utmost importance that the Draft Scope Guidelines are not “watered down” in any way, but remain a rigorous test of the proposed development and the assumptions underlying the proposal.**

Specific comments on sections of the guidelines follow, including our recommendations for additions or amendments to them.

Re. *Foreword*, p.31

We welcome the statement that new information which comes to light during the assessment, particularly in relation to environmental, social, economic and community issues relevant to the project, must be addressed in the IIS.

We also welcome the requirement of the *State Policies and Projects Act 1993* (Tas) that **a truly integrated assessment of all relevant issues is conducted.**

Re. **Frontispiece and Executive Summary**, p.35

We welcome the suggestion that the Frontispiece and Executive summary “should be designed to be easily read...”. However, we request the substitution of “**must**” or “**is to**” for “should” in each of these sections, as it need not be onerous for the proponent to produce comprehensible documents, and it is important that public participation by way of submissions is not obstructed by documents lacking in clarity.

We welcome the statement, “Where practicable, the draft IIS should contain headings that correspond to the main chapter headings and subheadings of (the final) guidelines.”

Such a layout would aid readers and, again, should not be onerous for the proponent. We request the substitution of “**must**” or “**is to**” for “should”, as the statement is already qualified by, “Where practicable”.

## **1.1 The Proposal**

Re. 1.1.2 Objectives of the proposal, p.36

a) We welcome the inclusion in 1.1.2 as well as in Section 2, of a statement from the proponent regarding the “need for the proposal”. Again, we request the substitution of “**must**” or “**is to**” for “should” in relation to this instruction.

b) We request the following changes to the wording of 1.1.2:

“... including a summation of the rationale, **perceived** need for the proposal and justification for disturbing a functioning estuarine ecosystem recognised and protected under State and Commonwealth statutes.”

Re. 1.1.3 Scope of the proposal, p.36

After the third dot point (“likely markets”), a dot point should be inserted as follows:

- likely capacity for properties in the development to sell and resell over time.

We ask for this to be included, as anecdotal evidence suggests properties in Gold Coast canal style developments resell rapidly, often within a year of first purchase because the reality of the poor “liveability” of the property does not match the “blue water vision” typically sold off a plan, and marketed to the “swimming pool mentality”. Since Tasmania does not have the level of constant population influx of Queensland, and since the Tasmanian community is well connected and networked, it may be that continuing sales of property in the closest canal estate to the Antarctic would not be an easy matter after the first disillusioned residents attempted to sell and move out.

Again, we welcome the Commission’s insistence that any relevant new information coming to light during the preparation of the IIS must be assessed in the IIS.

## **1.2 The Assessment Process, page 37 and**

## **1.3 Statutory and Non-Statutory Framework, page 38 - 40**

We welcome the comprehensive listing of legislation and policies to be addressed by the proponent in the IIS.

### 1.2.1 Description of the assessment, page 37

a) In relation to the fourth dot point, we request the addition of

*... the Tasmanian Regional Forest Agreement (RFA) 1997, as well as any implications for the Comprehensive Adequate Reserve System (CARS) in Tasmania caused by the loss of the current Ralphs Bay Conservation Area, which is listed under the RFA.*

### 1.3.1 Statutory instruments, page 38

We request the addition of, “in detail” to the fourth line, making this:

*“In particular, the proponent must comment **in detail** on the following in relation to the project.”*

In relation to 1.3.2 Government agreements, policies and strategies, page 38 – 39,

### **National, page 38**

We request the addition of

*“• The National Cooperative Approach to Integrated Coastal Zone Management”*

<http://www.deh.gov.au/coasts/iczm/index.html>

This is Australia's national coastal policy, and has coastal acid sulphate soils (CASS) as one of the key national issues for action, and;

“• The National Strategy for the Management of CASS”

This has references to canal estates, including their likelihood to disturb CASS, and the remediation costs in Queensland.

<http://www.mincos.gov.au/pdf/natass.pdf> “

**Tasmanian**, page 39

We request the addition of the

“• Water Quality Improvement Plan for Derwent Heavy Metals”

which has been quietly released in recent days. Its recommendations are of great significance in relation to this proposal, particularly the recommendation not to disturb Derwent sediments, and the need for Derwent specific dredging guidelines to deal with the environmental implications of re-suspending, moving or removing the metal-laden sediments.

The Tasmanian Government’s Climate Change Strategy may also be released during the period of the assessment and would certainly be relevant to it.

**1.4 Public Consultation and Participation, p.40**

- a) The proponent needs to create genuine opportunities for a wide cross-section of the general public to be consulted about the proposed development, in a convenient manner.
- b) Telephone polling by an independent, highly reputable company might be suggested or required here.
- c) During the Walker Corporation’s “Community Consultation” in 2004, there was concern relating to the limited opening hours of the company office/showroom in Lauderdale, limited ways to express an opinion, and community distrust of the level of support claimed by the company, without evidence to support its claims.

The proponent should be required to review the extent to which it reported on the 2004 consultation and whether any such reporting was available to the public.

- d) We request that the Guidelines be strengthened to include the need for the proponent to provide evidence of the methods used, reliability and accuracy of the claimed results of any consultation carried out, and for such consultation to provide ample opportunity for members of the community to express a view.

Transparency around the consultation process is essential.

e) We welcome the suggested “ongoing community participation / liaison programs” but suggest these should be managed by an independent mediator / facilitator, rather than by the proponent.

## **2. Need for the Project, p.41**

This section is of the utmost importance, and must not be weakened in any way.

We especially applaud the requirement that, “In particular, the proponent must address the need for the reclamation of land as opposed to the use of existing urban density residential land.”

We strongly support the emphasis on sound strategic planning.

We request the inclusion of the following additional point:

“The proponent should address the opportunity cost of resources, human and material, that would need to go into the project compared with normal, and affordable residential development in serviced and more accessible locations.”

## **Precautionary Principle**

a) We request that the **Precautionary Principle**, which appears as section 9.3 on page 76, be placed much further forward in the Draft Scope Guidelines. One possible place for the Precautionary Principle would be after **2. Need for the Project**, and before the current section 3.

## **3. The Site and Alternative designs Considered, p.42**

We applaud the requirement for the proponent to address all the listed Site Choice and Site Suitability issues in the draft guidelines.

### **3.1 Site Choice, page 42**

In the third line, the description of the site should be amended to read, “Ralphs Bay, including the Ralphs Bay Conservation Area,” as the whole of Ralphs Bay is much more extensive, and the proposed development site occupies the footprint of the Ralphs Bay Conservation Area.

### **3.2 Site Suitability, page 42**

a) In relation to Site Suitability, we strongly request the inclusion of **the prevailing weather at this site**. The first issue raised by local residents of the area in

conversations about the proposed development is usually the extreme windiness and wind chill of this part of Lauderdale, and the corresponding unpleasantness of the site as a place to live.

Severe corrosion of metal fittings on houses and vehicles out in the bay as a result of salt spray also seems likely, and the proponent should address the implications for longevity of exterior finishes and fittings and the cost of maintenance of such fittings and finishes.

b) The issue of the prevailing weather is fundamental to whether or not properties constructed in the bay would sell, or would ever resell if owners desperate to escape put them on the market. This is a serious matter, going to the heart of the economic assumptions behind the proposal.

An assessment of wind speeds, number of windy days, daily temperatures and wind chill is essential in order to evaluate the likelihood that any sane person would wish to live on an island in Ralphs Bay.

c) The potential for property damage resulting from increased storm activity and storm surges in the future should be addressed by the proponent, along with an assessment of the likelihood (or otherwise) that property owners will be able to insure against such damage.

d) In relation to 3.2.1 (2), we have some concern regarding the definition of “proximity”. In particular, we are concerned that the existing successful aquaculture operations in Pipeclay Lagoon, which are critically dependent on excellent water quality, may not be regarded as having close “proximity” to the development, and yet may be affected by resuspended heavy metals and other environmental pollutants resulting from the development. (For current flows around the South Arm Peninsula, see Figure 6 on p. 24 of the Bruny Bioregion Background Report, RPDC June 2006).

We suggest rephrasing 3.2.1 (2) as follows:

“capacity for the project and its associated infrastructure to have adverse impacts on existing land, water and marine uses”

e) In relation to 3.2.1 (7), we request that the Pied Oystercatcher be specifically mentioned as an additional species likely to be severely impacted by the proposed development, as follows:

“Any listed species... considered. **The Pied Oystercatcher must be considered in this section.**”

f) In relation to 3.2.1 (9), we are concerned that the phrase, “transport and access requirements” may be taken as relating only or mainly to the proponent’s transport and access requirements.

However, in relation to selection of the Ralphs Bay site, disruption of daily commuter transport for local residents is a very significant issue. The proposed development site is at a fairly narrow “neck” on the coastline, with limited capacity for rerouting traffic without causing considerable delays and inconvenience. This must be addressed by the proponent, particularly as the proposed period of construction is 7-10 years.

g) Also in relation to 3.2.1 (9), “transport and access requirements” may need to be rephrased to include the need for footbridges across the South Arm Highway, linking the proposed new development with the existing township of Lauderdale. This is relevant to the question of site suitability, as the proposed new development would be in danger of being “marooned” across the busy South Arm Highway, which is unsafe to cross at some times of the day.

f) Finally, we request the addition of the following numbered points under 3.2.1:

“visual impact on existing residents and other users of the area”.

“proximity to the Lauderdale Primary School and corresponding health risks to large numbers of children, especially during the construction phase.”

### **3.3 General Description of Development Area, and 3.4 Strategic Planning Details,** page 43 - 44

The issues raised in these sections are all valid and important for the assessment of the proposal.

### **3.5 Sustainable Outcomes, p. 44 – 45**

a) We request the following additions to 3.5 (1) on page 44:

“living and recreational environment, with special reference to protection from wind, salt spray and sustainability of the man made beaches.”

b) In relation to, “water sensitive urban design” in 3.5 (2), the proponent should give specific details relating to the provision of rainwater tanks and other water-conservation measures.

c) We request the addition of further numbered points in this section as follows:

“measures to minimize waste during construction including on-site and external recycling.”

“selection of materials for use in building and construction that have the lowest possible toxicity and lowest possible embodied energy. Extensive use of natural,

recyclable/reusable building materials. Timber not to be sourced from old-growth forests.”

“energy conservation and energy efficiency measures, including solar water heating, on-site renewable energy infrastructure and provision for energy generated in the development to be exported to the grid.”

### 3.6 Design Scope, page 45

All points in this section are valid and significant.

## 4. Description of Proposal

### 4.1 Project Development, p.46

a) In relation to the first set of dot points near the top of page 46, we request the addition, after the first point (“its key objectives”) of,

“• underlying economic assumptions of the project in the short, medium and long term”.

These do not appear to have been addressed elsewhere in the draft guidelines, but an examination of the proponent’s underlying economic assumptions may be fundamental to evaluating the likely success (or otherwise) of the proposed development in the short, medium and long term. Examination of the proponent’s economic assumptions may facilitate a realistic evaluation of the likelihood that future residents of the development and wider South Arm Peninsula, ratepayers in the municipality of Clarence, Clarence City Council and higher levels of government may be left to deal with major adverse impacts in the future. This is of great significance because the consequences of failures in the proposed development may be expensive &/or impossible to remediate.

b) We request the addition of “post-construction” into the last dot point in the first set near the top of p-age 46, so that it reads,

“proposed **post-construction** maintenance and monitoring practices and techniques”

c) In relation to the second set of dot points further down page 46, we request the addition of a second and third dot point (after “the reclamation...”) as follows:

“• on- and/or off-site treatment of excavated material from the site”

“• compaction of islands”

and, after, “the development of berthing facilities...” we request the insertion of a further dot point:

“• maintenance of waterways and water quality, including dredging facilities and their operation in the short, medium and long term”

#### 4.1.1 Development control requirements, p.46 – 47

All valid and important requirements

#### 4.1.2 Technical aspects, p. 47 – 49

All points listed are clear, valid and important.

a) In relation to the first set of dot points towards the top of page 48, under section 4.1.2 (2) (a), we request the addition of a plan showing,

“• artificial wetlands or other significant infrastructure to deal with runoff from the proposed development into the surrounding water” (cross-reference to page 44, section 3.5 (2), “how the project has addressed ..... water sensitive urban design..”)

b) In relation to the dot points towards the bottom of page 48, under section 4.1.2 (2) (b), we request the addition of

“fences, screens, barriers (including estimation of the time for which all temporary infrastructure would remain in place)”

to the third dot point (“any necessary temporary infrastructure...”). We request this because local residents who have visited Queensland canal estate development construction sites have reported being adversely affected by the visual impact of high metal barriers/screens blocking all views and any sense of space (let alone sense of place), when passing on the adjacent road. The community is entitled to know in advance about such impacts, including their likely duration, especially as the proposed construction period of is so protracted.

c) In relation to 4.1.2 (2) (g) on page 49, insert “each stage”, so that the section reads,

“photo montages of **each stage** of the proposed development....”

d) Also in relation to 3.1.2 (2) (g) on page 49, it is important that the viewing positions explicitly include views from the existing Lauderdale township and the South Arm Highway as a traveller passes through in either direction, and from Doran’s Road.

e) We request the addition of a further point, 4.1.2 (9), as follows:

“(9) Major sources of air and ground vibration must be identified, and the magnitude and areas likely to be affected quantified”.

**4.2 Use and Development of Infrastructure and Off-Site Ancillary Facilities,**  
p. 49 – 50

All points in this section are valid and significant.

In relation to section 4.2.1 (1, 4 and 11) on page 50, we welcome the requirement for the proponent to address the issues of traffic impacts in general, as there is considerable community concern regarding potential significant impacts on traffic flow, increased journey times and increased risk of road traffic accidents for South Arm peninsula residents and visitors during and after the construction period.

We request that the guidelines be amended specifically to include (in addition to the existing points):

a) Short, medium and long term traffic impacts on the Lauderdale Primary School community, including impacts on safety for school children and their family members travelling to school by any means such as walking, cycling or by car; and direct noise, air pollution and dust impacts on the school community as a result of construction vehicle activity.

And b) Short, medium and long term impacts on the capacity of the Tasman Bridge to carry traffic from the eastern shore to the western shore without excessive delays, especially at peak times.

**4.3 Construction, p. 50 - 52**

All points in this section are valid and significant.

a) Regarding 4.3.1 (1) on page 50, “The site preparation works involved”, please add, “including any sealing off of the construction site from surrounding waters and pumping to dry the construction area.”

b) Regarding 4.3.1 (4) on page 51, include “treatment” as follows:

“Estimates of quantities and quality of excavated material (landside and in Ralphs Bay) to be disposed of, and methods of extraction, **treatment**, disposal and disposal sites...”

c) Also regarding 4.3.1 (4) on page 51, add “and sediment turbidity plumes in general” and include waters surrounding the South Arm peninsula, especially Pipeclay Lagoon, as follows:

“... and the impact of any heavy metal contamination **and sediment turbidity plumes in general** on the health of the River Derwent, Ralphs Bay, the Lauderdale Canal **and waters around the South Arm Peninsula, especially areas of Spotted Handfish**”

**critical habitat between Opossum Bay and South Arm, and Pipeclay Lagoon, including potential impacts on aquaculture operations in Pipeclay Lagoon.”**

(For current flows around the South Arm Peninsula, see Figure 6 on p. 24 of the Bruny Bioregion Background Report, RPDC June 2006).

d) Regarding 4.3.1 (5) on page 51, especially the fourth dot point, add “and likely movement path of a resulting sediment plume”, as follows:

“• the extent and effects of excavation and dredging requirements, especially sedimentation (including resuspension **and the likely movement path of a resulting sediment plume**)

**4.4 Operation and Maintenance, page 52**

We request additional numbered points under section 4.4.1, dealing with:

a) “A description of the immediate and future emergency, disaster or evacuation plans, including assessment of the need for lifeboats, in relation to potential storm surge or other extreme weather event.”

(There have been press reports of the requirement for the provision of lifeboats in Gold Coast developments).

b) “A description of how the proponent plans to maintain the artificial beaches in the proposed development, over the long term.”

**5. Potential Environmental Impacts and their Management, page 53 - 65**

**5.1 General Information, page 53 - 55**

5.1.1 We request that the proponent be asked to provide a review of the reasons for the ban on canal estate developments in the state of New South Wales.

5.1.2 Potential for climate change impacts should also be explicitly mentioned here, in the context of limitations of the extent to which future variability is likely to be represented by the baseline data.

No changes suggested for 5.1.3; 5.1.4; 5.1.5; 5.1.6; 5.1.7; 5.1.8.

**5.2 Environmental Issues, p. 55 - 62**

5.2.1 Biodiversity issues, page 55 - 57

All matters raised in the draft guidelines on pages 55 – 57 are of genuine concern and significance, and we submit that these sections (along with the rest of the draft guidelines) **must not be “watered down” in any way, and the proponent’s IIS must respond meaningfully to each and every section.**

a) We request the insertion of “and vibration” into the last sentence of the second paragraph, so that it reads,

“Potential environmental effects associated with .....excavation and dredging (5.2.9) **and vibration (5.2.13)...**”

b) We request the addition to 5.2.1 (1) of an evaluation of likely native animal roadkill impacts of the proposed development.

c) Sea eagles have been observed fishing in Ralphs Bay, and should be considered for listing in section 5.2.1 (2) (b).

d) We request the addition of two new clauses (15) and (16) at the end of section 5.2.1, on page 57, as follows:

“(15) Describe measures that would be employed during and after construction to prevent litter and pollutants such as fuels, oils, sewage, fertilisers, pesticides and sediment entering the marine environment”

“(16) Detail impacts on the Ralphs Bay ecosystem structure and dynamics, with particular attention to trophic pathways (food webs), particularly the contribution of primary production provided by surface sediment microalgae on the tidal flats to sediment fauna and the rest of the food chain (including shorebirds), as well as the Ralphs Bay marine system.”

#### 5.2.2 Geomorphology and coastal processes, page 57 – 58

a) We have estimated that there will be over 1 million cubic meters of material disturbed by the Ralphs Bay proposal. This means that the proposal is comparable with a significant mining development. Unlike a mine, however, the disturbed earth will be surrounded by water. This means that the water pollution that results from the disturbed ground will flow directly to the environment. **It is therefore critical that the proponent is required to calculate the pollutant burden that will result, prior to construction.**

In order to do this, material needs to be obtained and tested. Given the water depth for the development is over 2 meters, this will require samples to be taken to a depth of over 3 meters from the upper beach and over 2 meters from the lower beach. **Enough samples should be taken to ensure that a representative dataset is obtained.**

**The samples would then require geochemical testing and column leach testing.**

Column leach tests will be required under aerobic conditions over a time period that will give meaningful results. Column leach tests will be required with both fresh and saline water. This section should therefore be strengthened so the likely long term pollutant loads can be estimated. Other forms of pollution production as well as acid sulphate soils need to be measured.

The sample collection may require heavy machinery and the impacts of this machinery on the beach, flora and fauna, must be minimised. Samples collected for the above could also be used for geotechnical testing. This may allow a more accurate estimate of costs for the developer.

b) We request the insertion of an additional point between 5.2.2 (4) and (5) as follows:

**“Impacts of introducing sand from other locations to construct artificial beaches, including impacts on ecosystems.”**

No changes suggested for 5.2.3; 5.2.4. All matters raised in the draft guidelines on pages 57 – 59 are of genuine concern and significance, and we submit that these sections (along with the rest of the draft guidelines) **must not be “watered down” in any way, and the proponent’s IIS must respond meaningfully to each and every section.**

5.2.2 (5) Impacts of acid sulphate soils should include loss of amenity, as residents of interstate canal estates have complained of staining on yacht hulls as well as offensive smells resulting from the presence of these soils.

5.2.5 Water quality, page 59

a) In relation to 5.2.5 (1), we query the meaning of the word, “suitable” in the phrase, “suitable water quality in Ralphs Bay”. We suggest “existing or improved” as an alternative (ie existing water quality must not be degraded). The phrase then reads:

**“Outline measures to protect and maintain existing or improved water quality in Ralphs Bay”**

b) Water quality data from canal developments should be available from interstate. The proponent should provide a comparison of the water quality from these developments with the extensive dataset of water quality collected by the state government in the Derwent Estuary. SRB Inc has reports of secchi disc measurements of less than 15cm in canal developments. In contrast, the Derwent often has secchi disc measurements of over 10 meters, and water clarity in Ralphs Bay would not differ greatly.

c) We would like the scope of point 5.2.5 (1) increased, so that it reads:

“(1) Outline measures to protect and maintain **existing or improved** water quality in Ralphs Bay, **the River Derwent and waters around the South Arm peninsula at least as far as Pipeclay Lagoon**, as a result of excavation and dredging”

We strongly support all points currently in 5.2.5 of the draft guidelines.

No changes suggested for 5.2.6

5.2.7 Dust, page 59

We request the insertion of, “adverse” and “in particular on the nearby Lauderdale Primary School” into the section, so that it reads,

“Evaluate the potential for dust to cause nuisance and **adverse** health effects during the construction phase of the project, **in particular on the nearby Lauderdale Primary School**, and outline...”

5.2.8 Noise, page 60

In relation to 5.2.8 (1), we request the insertion of, “pumping, excavation, sediment treatment”, and “including ongoing dredging and pumping”, as follows:

“(1) Provide information on the expected levels of noise associated with **pumping, excavation, sediment treatment**, construction and operation of the development **including ongoing dredging and pumping**, identifying all potential noise sources...”

5.2.9 Excavation and Dredging, page 60

a) In relation to 5.2.9 (7), we request the addition of “and around the South Arm peninsula, especially in relation to critical habitat for the Spotted Handfish and aquaculture operations in Pipeclay Lagoon”, as follows:

“(7) Evaluate the potential for sediment disturbance, sediment plumes..... in Ralphs Bay, the River Derwent **and around the South Arm peninsula, especially in relation to critical habitat for the Spotted Handfish and aquaculture operations in Pipeclay Lagoon** arising as a consequence of excavation and dredging”.

b) We very strongly recommend the addition of the following additional point before point 5.2.9 (8) on page 60:

“Disturbance of Coastal Acid Sulphate Soils, by means of excavation or changed water movement, and the potential for chemical changes resulting in the release of acid or unbound heavy metals from the sediments”.

c) The proponent should specifically address the issue of **formation** of acid sulphate soils as a result of dredging, in addition to the presence of acid sulphate soils as a pre-existing condition. Unfortunately, even if acid sulphate soils are not already present they may form in sediments as a result of the canal development. Given the world record for zinc levels from an oyster comes from Ralphs Bay it is reasonable that the sediments may be high in metals. These metals may be suddenly released when re-exposed to oxygen during a dredging operation. Dredging operations may have to deal with this scenario. This would add significant costs to any dredging operation.

#### 5.2.10 Disposal of excavated fill, page 60 – 61

In relation to the heading of this section, we request the addition of, “including dewatering”, so that the heading reads,

#### 5.2.10 Disposal of excavated fill **including dewatering**

In relation to 5.2.10 (3), we request the addition of, “from a range of depths”, so that the point reads,

“Identify the anticipated extent of contamination of excavated material **from a range of depths, and means of treatment**”

#### 5.2.11 Climate change, page 61

We welcome the inclusion of this section, but have some concern regarding the extent of the “surrounding area” to be considered.

a) We request the addition of the following:

“The proponent is to evaluate the potential for increased tidal and related erosion impacts of sea level rise, following the South Arm Highway realignment, on the strip of land between Ralphs Bay and Bayview Road south of the tip, and to assess the risk of erosion of the south eastern end of Bayview Road and the beaches of Frederick Henry Bay as a result of being caught in a “pincer” of sea level rise and wetland erosion.”

b) Storm surge modeling needs to specifically consider predicted changes in event frequency.

c) As well as considering the potential impacts of climate change on the proposed development, this section needs to address the impacts of the proposed development on climate change, as follows:

“(2) Outline the greenhouse impacts of the proposed development, including impacts of fuel combustion in all transport and machinery operation associated with all phases of the development, greenhouse impacts of gases released from rotting dead organisms in all excavated sediments and additional energy use during the excavation and construction phases, ie embodied energy of the development.

(3) Outline the greenhouse impacts the proposed Lauderdale Quay community would have, as it accessed employment, shopping centres and community services. Estimate the greenhouse impacts of air travel to and from the proposed development, by interstate, part-time residents of the development.”

No changes are suggested to 5.2.12

An additional section 5.2.13 is requested, to cover the impacts of vibration from compactors, blasting etc. as follows:

#### “5.2.13 Vibration

Identify and quantify any sources of vibration during the construction phase, and evaluate its effect on nearby structures, residents and wildlife (terrestrial and aquatic). Detail the measures that would be employed to mitigate the impacts of vibration, and any pre-dilapidation surveys that would be carried out.”

### **5.3 Visual and Urban Design assessment, page 62**

No comments on this section.

### **5.4 Construction and Operational Issues, page 63**

#### 5.4.1 General, page 63

We strongly support all points in 5.4.1 of the draft guidelines.

No changes suggested to 5.4.1

#### 5.4.2 Traffic and transport issues, page 63 - 64

Please cross-reference to our suggestions a) and b) in relation to section 4.2.1 (1, 4 and 11) on page 50, regarding impacts on the Lauderdale Primary School community and capacity of the Tasman Bridge.

With regard to the current point 5.4.2 (3) on page 64, the “impacts reviewed” should include recession of the Ralphs Bay shoreline as a result of removal of a section of the existing South Arm Highway during the proposed realignment, especially at those sections of the road where seawater current reaches the road at high tides, and the possibility that such shoreline recession would proceed rapidly across some of the flattest, lowest areas inland of the current South Arm Highway.

We request the insertion of a new point 5.4.2 (4) on page 64 as follows (with corresponding renumbering of the remaining points):

“(4) The proponent is to specifically address the issue of current journey times for residents of Opossum Bay, South Arm, Clifton, Cremorne and Sandford to the city of Hobart, and the magnitude of predicted increases in the journey time at each stage of the development. The impact of significantly increased journey times over extended periods during the 10-year development on property values throughout the peninsula should also be evaluated.”

#### 5.4.3 Dangerous substances, page 64

No comments on this section.

#### 5.4.3 Occupational health and safety, page 64

Exposure of workers involved with excavation and processing excavated sediments to heavy metal pollution could be added here.

#### 5.4.4 Public health and safety, page 64

No comments.

## 5.5 Environmental management, page 65

a) We request the addition of the following points 1 and 2 in bold type to the second paragraph, first sentence after (such as ISO 14001):

“The EMS should be modelled on .....(such as ISO 14001) including:

1. **the implementation of a continual improvement (adaptive management) cycle and**
2. **detailed trigger points for performance measures and the management actions that will be triggered.**

It must provide .....

b) We request the insertion of “independent” into the 11<sup>th</sup> dot point on page 65, so it now reads:

“• a program for regular **independent** environmental auditing”

c) We request the addition of two additional dot points to 5.5, as follows:

“• procedures for monitoring the potential environmental impacts outlined in section 5.2, recording the information, and responding to detected exceedances of set limits, and other pollution incidents;

• a complaint handling procedure.”

## 6. Economic Impacts, page 66

The “user pays” principle should apply to residents of the proposed canal estate and users of the marina and associated facilities. The proponent should therefore report on body corporate rates to the householders. The report should include how the body corporate rates will cover future dredging and zinc loaded dredge spoil disposal over the long term.

### 6.1 General, page 66

a) We request that the potential negative impacts on existing, sustainable local economic activity (such as aquaculture, especially at Pipeclay Lagoon) is given more weight in the analysis than any claimed future economic benefits of the proposed development, especially given that failed developments of this type elsewhere in Australia have proved immensely costly to local government.

b) Cost/benefit analysis of the proposed development could be considered as a means of assessing of its economic impact.

## **6.2 Existing Economic Profile, page 66**

a) We request that two independent reviews are provided here, as the report of only one auditor/surveyor can lead to agency issues and the report may not be objective or in the public interest.

b) The existing economic profile is to include the aquaculture industry, especially at Pipeclay Lagoon.

c) We request that the proponent be required to,

“report on the current value of **ecosystem services** including, but not limited to,

- biogeochemical processes in the sandflats important in the maintenance of water quality in the River Derwent and Ralphs Bay;
- fish nurseries;
- storm surge protection;
- habitat for flora and fauna, especially listed species;
- ecotourism, especially birdwatching;
- recreational activities including windsurfing;
- the portfolio effect;

and to conduct an ecosystem cost benefit analysis for the River Derwent, Ralphs Bay and the waters surrounding the South Arm peninsula.”

## **6.3 Broad Economic Impacts, page 66**

a) We request that the guidelines require transparency on the model of impact assessment used by the proponent, as this will allow independent groups to assess the strengths and weaknesses of the model.

b) Dot points should include any potential adverse impacts on employment, especially in relation to the local aquaculture sector. Adverse impacts on this sector as a result of poor water quality would be most likely at Pipeclay Lagoon, but potential impacts in Pittwater and the d’Entrecasteaux Channel should also be evaluated. Water flow in the Channel is generally northwards from the Huon estuary, but in the event of uneven heavy rainfall around the state resulting in heavy water flows in the Derwent catchment at the same time as reduced flows in the Huon estuary, polluted Derwent water could be driven into the Channel.

## **6.4 Impacts on public revenue and expenditure, page 66**

This section is of great importance to the community, as failed canal estates elsewhere in Australia have resulted in onerous costs to local government and hence to ratepayers.

- a) Given the potential for environmental impacts of considerable magnitude which would be essentially irreversible in any meaningful timeframe, this section should consider the possible costs associated with attempts at remediation of major adverse outcomes.
- b) The proponent should be asked to compile a report on failed canal estate developments in other parts of Australia, and the costs incurred by local and other levels of government as a result.
- c) The proponent should complete a review of likelihood or otherwise that canal estate property owners would be able to purchase insurance against the risks of weather or storm surge damage, subsidence, cracking and the like.

#### 6.4.1 Existing capacity and suitability of existing infrastructure and provision, page 67

We request the provision of two assessments of these aspects, for a fair and objective analysis.

#### 6.4.2 Requirements for additional Government expenditure or enhanced community services and facilities and any impacts on current levels of Government health, education and housing expenditure, page 67

The guidelines should also recommend a justification of any claims for public subsidy. Complete transparency in regard to provision of public funds is essential. The mixture of some private funding contribution to these items could be seen as a gesture of goodwill and could be requested in the guidelines.

#### 6.4.3 Payments to Governments, including... page 67

These payments should be standard unless there are any deals taking place that somehow lower the duty imposed on the developer, in which case full transparency is essential and details should be disclosed.

No comments on 6.44 or 6.4.5

### **6.5 Employment Impacts, page 68**

- a) In relation to 6.5.1 on page 68, the number of full-time jobs must be specified for the construction phase. The use of FTE (full-time equivalent) should be avoided as it is not an accurate measure due to overtime and temporary workers which are likely to dominate the construction phase.

- b) In relation to 6.5.2 on page 68, we request two assessments of this aspect, for a fair and objective analysis.
- c) In relation to 6.5.3 on page 68, we request two assessments of this aspect, for a fair and objective analysis. The aquaculture sector is to be included.
- d) In relation to 6.5.4 on page 68, we request two assessments of this aspect, for a fair and objective analysis. This is a key factor: to have the greatest benefit for Tasmania, the jobs need to come from within the state (especially in construction).
- e) We request the proponent be required to indicate any strategies proposed to make the jobs sustainable, for instance in regard to transferable skills and retraining.

## **6.6 Impacts on Business Activities, page 68**

- a) With regard to the opening paragraph, we request two assessments of each aspect, for a fair and objective analysis.
- b) We request that impacts on the aquaculture sector be specifically evaluated in the analysis.

## **7. Social and Community Impacts, page 70**

In relation to 7.1.1 on page 70, we request the following change to the wording:

“... the vicinity of the Lauderdale Quay site, including the entire South Arm Peninsula south of Lauderdale and other locations within at least a 10km radius of the development site.”

In relation to 7.1.2 on page 70, all residents of the South Arm peninsula will have to travel through the proposed construction zone and past the proposed development, on every journey beyond Lauderdale, and this will have an enormous effect on the residents’ and visitors’ sense of place and enjoyment of life in the (currently relatively unspoiled) South Arm peninsula.

The entire South Arm peninsula south of Lauderdale should therefore be specifically included in all definitions of “the vicinity”, regardless of distance, as should other nearby locations.

## **7.2 Social and Community Effects to be Addressed, page 70**

No comments on 7.2.1

a) In relation to 7.2.2 on page 70, we request the addition of:

“The proponent is to provide independently researched evidence of reasons why residents choose to live in the South Arm peninsula region and what aspects of their current lifestyle they currently identify as providing enjoyment and amenity.”

b) Enjoyment of Ralphs Bay is to specifically include the special values of the area of the bay extending from the Dorans Road jetty and currently enjoyed by the windsurfing community, and the enjoyment of birdwatching by local residents and Tasmanian, interstate and overseas visitors at various locations around the bay. Aesthetic appreciation of the uninterrupted vistas across the bay towards the mountain must be considered as integral to residents’ sense of place, along with views of the skies reflected in undisturbed wet sand and shallow water, and the pleasure experienced by members of the general community on seeing the shorebirds feeding on the sandflats, and the tide rising and falling in relation to the saltmarsh vegetation.

c) 7.2.3 on page 70 should include consideration of security at the school in the event of unoccupied houses in the proposed canal estate becoming a magnet for criminal activity in the area.

d) The “ongoing consultation” discussed in 7.2.4 and 7.2.5 should be carried out by an independent body rather than the proponent. This section should describe what recourse is available to the community in the event of the proponent not complying with arrangements agreed during the consultation.

### **7.3 Health Impact Assessment, page 71**

a) We request the following addition to the opening paragraph of 7.3.1 on page 71:

“... impact of **heavy metal contamination and mosquitoes and mosquito-borne diseases, especially, but not restricted to, Ross River Fever. Predicted increases in the incidence of such diseases resulting from global warming are to be included in the review.**”

b) In relation to 7.3.1 (1), mental as well as physical health should be included.

No comments on 7.3.2

### **7.4 Cultural Heritage, page 72**

a) 7.4. (2) and (3) should include oral history, including the significance of the area as a swan egg gathering site and provider of other seasonal foods and its cultural significance as a whale birthing area.

## **7.6 Consistency with Government Policies, page 73**

The proponent should be required to demonstrate that the proposal *is* consistent with Government policies.

## **7.6 Impact of Project Not Proceeding, page 73**

Partial completion of the proposed development is a matter of considerable concern, given the magnitude of its destructive impacts and the probability that these impacts could not be reversed or remediated in any reasonable timeframe or at any reasonable cost.

## **8 Monitoring, page 74**

a) In relation to 8.1, 8.2 and 8.4, the consequences of non-compliance with performance standards need to be specified if there is to be any public confidence in the monitoring programs.

b) We request the insertion of “independent” into section 8.4 as follows:

“• The IIS should outline an appropriate procedure for the periodic **independent** audit and review of the environmental management of the project and the outputs from the monitoring program.”

c) In relation to 8.6, if the proponent does not have plans to achieve ISO 14000, it should provide an explanation of reasons why not.

## **9. Commitments, page 75**

No comments.

## **9.2 Contingency Plans, page 75**

See previous comments on 7.6.

## **9.3 Precautionary Principle, page 76**

As previously stated, we would like to see this at the front of the guidelines rather than at the back.

**10. Performance Bonds, page 77**

If the proponent hopes to have any credibility with the Tasmanian community, such bonds would have to be very considerable, especially in the light of the highly disruptive and destructive nature of the proposed development and the magnitude of its likely impacts.

- 11. Conclusion, page 78 )**
- 12. References, page 79 ) No comments**
- 13. Appendices, page 80 )**