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(Extension of Harwood Slipway's junk yard)

Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front in Grafton for over 30 years, and has a proud history of environmental advocacy. The conservation of the Australia's natural environment, both terrestrial and and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance.

Background

It is now almost 7 years since Harwood Slipways presented Clarence Valley Council with their plans for an industrial precinct on highly unstable, flood-prone land on the banks of the Clarence River at Harwood.

Since that time there have been numerous reincarnations of that original plan, until rezoning of some of the land was finalised, opening the way for Harwood Marine's project to proceed.

Current proposal

The current proposal is to construct a very large compound, half the size of a football field, in which to house "boats and equipment", which appears to be an expansion of the junk yard currently contained within the original 7ha slipway compound, and is now presumably overflowing.



Within the slipway's 7ha complex in 2012, the scene neighbours have had to put up with.

We have re-read the original concept plan, on which Clarence Valley Council based its decision to rezone the land, and we are told of plans to construct raised pads on which factory sheds would be built. There is mention of storing new, recently completed boats, awaiting despatch. However, nowhere do we see areas set aside for proposed storage compounds, through which flood-waters would flow, washing oil and other pollutants off the stored equipment out into the river and ocean.

According to that concept plan, the proposal was to attract, *“boat builders and repairers as well as electricians, electronics experts, hydraulic, diesel, timber and metal trades as well as engineers and other marine industry experts.”*

It is envisioned a marine precinct would grow over many years with additional industries and site users setting up as the momentum of the precinct increased. In its ultimate stage it may have multiple boat builders with multiple slipway facilities as well as wharves and moorings with the potential for freight and materials storage. Both large and small boats manufactured on the site would be either sailed off to their destination, or if smaller, then freighted by road or rail.”

Concerns about the assessment of environmental impacts

The response to Council's query *“Will the development adversely affect the natural environment, including any impact on flora, fauna, fish or their habitat”*, we are given the ridiculous assurance, presumably without any expert advice, that there is *“no native flora”* on the site. It goes on to explain that following the clearing of the land, only grassland remains, clearly under the impression that grasses, and herbs that go to make up *“grassland”* are not flora.

As it happens, low-lying swampy country such as that at the proposed site, is rich in native flora with a number of threatened species known to occur locally in that type of habitat. These include, *Arthraxon hispidus*, *Lindernia alsinoides*, *Rotala tripartita*, and even *Maundia triglochoides*, a species I personally identified, and photographed, some years ago on the adjacent crown land.

Council never required any flora or fauna assessment prior to the rezoning, claiming that those surveys would occur when individual plots were ultimately developed. This is the second DA that has been lodged since that time and, as expected, Council has not required any such assessment. Frankly we believe this is totally unacceptable, and that Council deliberately misled the community in regard to what level of flora and fauna assessment would ever be required.

The fact that it is low-lying land, partially due to the earlier construction of the adjacent toxic waste ponds which saw soil excavated for the containment walls, is of even greater concern. The resultant channel runs directly into the E2 zoned wetland area which, as the ground plan clearly shows, is just 20m away. Therefore, with every shower of rain, the wide array of pollutants that unused machinery will always deposit, when left lying around on the ground, will be washed directly into the E2 zone.

The original concept plan made much of the high standard of storm water management that would be provided, unlike this proposal, with its high potential for creating pollution, which has no such plan.

Therefore we believe that, rather than allow the owner to continue developing the site, one small DA after another with no real environmental impact assessment, the proponent should be required to undertake a full assessment of the ultimate impacts of developing the site as per the original concept. As an integral part of such an assessment, storm-water run-off, and the potential for industrial waste pollution, has to be a priority consideration.

In conclusion.

We can see no reason why this proposal should be approved, and suggest the proponent be required to find flood-free land where their unwanted machinery can be safely stored.

We appreciate the opportunity to comment.

Yours sincerely
John Edwards (Honorary Secretary)