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# **Submission**

**to**

## **Clarence Valley Council**

**on**

# **Harwood Marine's proposed Marine Precinct**

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**Scientific Licence No. SL 100126**

**For the Clarence Environment Centre**

**Date: 10<sup>th</sup> January 2014**

# Submission to Clarence Valley Council on the Proposed Harwood Marine Precinct

## Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front in Grafton for over 23 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

In November 2012, Harwood Marine approached Clarence Valley Council with a proposal to establish a marine precinct adjacent to its slipway operation on relatively remote, flood-prone farmland on the lower Clarence River floodplain at Harwood Island, requesting that Council make zoning changes to facilitate the plan.

Council's Environment, Economic and Community Committee considered that application on 11<sup>th</sup> December, 2012. The Council Papers did not display wholehearted support for the proposal reporting that it, “... is ***generally consistent*** with a range of strategic policies aimed at enhancing the area's potential to develop a marine based industry sector”, concluding that, “the site ***seems to be able to meet most planning issues***, and recommended the following actions:

1. *As the relevant planning authority, initiate the Local Environmental Plan “Gateway” process pursuant to Section 55 of the Environmental Planning and Assessment Act 1979 by endorsing the attached Planning Proposal over Lots 1 - 4 DP1155528, un-notified Crown Reserve and adjoining accreted land, to rezone the land to IN4 Working Waterfront and W3 Working Waterways to enable the development of a marine industry precinct adjoining the existing Harwood slipway.*
2. *Forward the Planning Proposal to the Department of Planning and Infrastructure requesting a “Gateway” determination, pursuant to Section 56 (1) of the Environmental Planning and Assessment Act.*
3. *Request a road access strategy to be prepared by the proponent for exhibition with the draft Planning Proposal.*
4. *Undertake community consultation regarding the Planning Proposal, subject to the determination of the Gateway Process.*

On the 21<sup>st</sup> December 2012, Clarence Valley Council wrote to the Planning Department, receiving a response on 27<sup>th</sup> February 2013, advising that “the planning proposal should proceed subject to the conditions in the gateway determination”.

The Planning Minister also picked up on one significant omission within the proposal, adding a requirement to, “assess the type, quality and significance of native vegetation and habitat found on the site. Once this additional work has been undertaken, Council may wish to revisit the proposed zoning of land within Lot 1 DP 1155528 which contains areas of native vegetation.”

The Clarence Environment Centre has examined the proposal, and believe those presenting the document have not been sufficiently transparent with the information they have provided. This appears consistent with the proponent's history (see Appendix A), which is one of continued non-compliance with regulations exacerbated by problems associated with operating on highly flood-prone land. Those problems are generally down-played or misrepresented in the Proposal, therefore we make the following comments for your consideration.

## Summary

The Clarence Environment Centre has assessed the Proposal and makes the follow observations:

- We believe that with sufficient available land already zoned industrial across the LGA, there is no need for a separate industrial complex on the Clarence River bank at Harwood.
- The project site contains some of the best stands of remnant native vegetation left on the island, including threatened species and endangered ecological communities, and these facts have not been identified by the proponent.
- Flooding issues have been massively understated in the Proposal, incorrect projections have been used and, by the consultant's own admission, the impacts of climate change, with associated sea level rise, have been ignored.
- The proponent has failed to properly identify the presence of crown land, which they intend to exploit for river access, or that it is subject to a native title claim.
- Council's revised mapping showing proposed rezoning, also fails to identify the presence of crown land that is subject to a native title claim.
- There are significant doubts about the veracity of Proposal's claims that areas previously mapped as acid sulphate, actually contain “potential” not “actual” acid sulphate soils.
- Given a long history of POEO licence breaches by the proponent (see Appendix A), we believe the proponent is not a fit and proper applicant for such a proposal.
- One problem with operating on a floodplain of a river whose catchment consists of highly erodible soils, is sedimentation. The proponent appears to have deliberately avoided mention of problems with sediment disposal. The proponent's existing operation has more than 7 hectares of sediment ponds; where will the 10 new complexes dispose of their sediment?
- We believe that in a world where starvation and malnutrition is a major problem, turning prime agricultural land into an unneeded industrial complex, is highly immoral.
- Other than identifying the strong competition from the Pacific Highway upgrade and the West Yamba development for the massive amount of fill that will be required, the proponent ignores the cumulative environmental impacts occurring at quarry sites to provide that fill.
- Contrary to repeated claims in the Proposal that the plan is consistent (or more frequently “*justifiably inconsistent*”) with the objectives and actions contained within the Mid North Coast Regional Strategy, we disagree. That strategy does not identify Harwood Island as a potential industrial zone, and focusses very heavily on the potential for tourism development. We believe the last thing tourists would want to see is an industrial complex on the banks of the iconic Clarence River.
- Likewise we disagree with the proponent's claims that the proposal is consistent with the aims of the “Clarence Marine Precinct / Clarence River Way Master plan”. That Plan clearly states: “*The sector’s growth potential is linked to tourism*”, and that, “*this combined with the affordability and capacity of the Clarence, opens doors for fresh thinking around moor, boat and drive **particularly targeted at the south east Queensland recreational market***”.
- No consideration has been given to the issue of soil stability due to the shallow water table in the area. There is evidence of significant river bank erosion and accretion, and anecdotal evidence of rattling windows when heavy vehicles pass, suggestion poor soil stability.
- The Proposal has already caused deep divisions within what was previously a harmonious rural community.

## The Proposal

The Harwood Island floodplain is, and always has been, a rural community, dominated by cane fields and other agricultural pursuits. The Harwood Marine complex was established some 40 years ago and, despite its relative proximity to the Harwood Sugar Mill, is an anomaly, some say an abomination, and out of place with its 'junk-yard' appearance.



**Junk yard appearance of the Harwood Marine works' site, an eye-sore for neighbours, and a constant threat to air and water quality. Harwood Island is no place for an industrial complex.**

### Issues:

- \* **Need for the marine precinct.** The Clarence Environment Centre believes there is no need for a separate industrial complex on Harwood Island.

The Mid North Coast Regional Strategy makes the assertion that *“Marine-related industry presents an important employment opportunity for the Region combining tourism, manufacturing and transport and storage. There is capacity for the supply of marine berths to grow to meet demand North Coast Region. Commercial synergies can be capitalised on between tourism and boating services to provide specialised employment.”*

The proponent has used this statement to justify their marine precinct proposal. However, we believe this proposal cannot be seen as complementing tourism in any way, and that the Strategy's comments referred to marinas and associated small workshop enterprises.

- \* **Native vegetation and threatened flora:** The proposed marine precinct site contains some of the most significant native vegetation remnants on the island, which includes endangered communities and threatened flora.



**There are extensive stands of mangroves along the river.**

The Planning Minister's noting of the fact that the project site contains “*areas of native vegetation*”, and the subsequent remark that “*Council may wish to revisit the proposed zoning of land within Lot 1 DP 1155528 which contains areas of native vegetation*”, has resulted in Council doing just that in a draft amendment, cynically drawing a circle around each remnant and rezoning them E2 – Environmental Conservation.

Presumably Council felt this would do away with any need to, “*assess the type and significance of native vegetation and habitat found on the site*”, as suggested by the Minister, as no comprehensive ecological survey of the site appears to have been done, certainly no such document has been placed on exhibition.

In fact, neither word, flora or fauna, are revealed by a word search of the proposal document, but the consultant does admit that “*Some gallery stands of vegetation will be lost*”, adding, “*however, these are minor areas that are not currently mapped for environment protection*”.

The river bank immediately adjoining the subject land to the north, was previously mapped for environmental protection, and the Clarence Environment Centre wrote to all relevant agencies expressing the view that that protection should have been extended upstream to include the extensive mangrove forest on the crown land section, pointing out that Mangroves are protected under Section 205 of the Fisheries Management Act 1994

**Note: A considerable area of crown land, situated east of Lot 1, had not been identified as such on previous LEP mapping, and the amended “Draft Land Zoning Map” likewise fails to identify that fact, which has now been proposed to be rezoned IN4 – Working Waterfront, even though the area is subject to a native title claim.**



Finally, in relation to flora and fauna, the failure to undertake any ecological surveys of the subject site has resulted in at least one endangered species being overlooked by the proponent. A wetland species, *Maundia triglochoides*, was identified during a Clarence Environment Centre inspection earlier in the year, growing along a creek line in an area that is outside the latest E2 zoning.

There are any number of threatened species known to occur in floodplain wetlands, that could well occur on the site.

\* **Flooding:** All of the proposed precinct site is flood-prone, much of it inundated to a depth of 1.5 metres (see image below), a fact acknowledged in the proposal document, and clearly mapped as such in the LEP.

Three major record breaking floods have struck the Clarence Valley in as many years, the last in early 2013. This is a problem that is certain to worsen over time, as sea levels rise (estimated 1m within 90 years), and more intense weather events occur as a result of climate change. Despite this, the consultant makes the extraordinary admission (page 2) that “*future climate impacts have not been simulated to date*”.

This proposed development has a 'use-by date", yet when asked if the proposal is *consistent with applicable state environmental planning policies?*", the consultant answers in the affirmative.

Not only does the consultant assert that it is justifiable to disregard the Section 117 Directions in regard to development on flood-prone land, they also disregard the impacts of climate change. This is simply irresponsible and unacceptable.



**Flooding is a problem at Harwood Island, and it will worsen with climate change. This image is from the relatively small 2009 flood showing Palmers Island in the foreground with the Harwood Marine site in the centre, beyond the three sediment ponds on the far side of the river. The heavily vegetated, heavily flooded land on the right is the protected mangroves and other remnant native vegetation on the proposed development site.**

- \* **Native Title and Cultural Heritage:** The proposal outlines the history of two Native Title claims on the site, but deliberately blurs the extent of those claims as follows.

Beginning with a description of the claim on "*the bed of the river and its banks*", from the sea to the Harwood bridge, the proposal document describes the second claim as, "*an area of land and water covering the coast from the Wooli River to Yamba and includes the ocean and 1400 square km of land*". Harwood Island happens to be north of the described Wooli River to Yamba area, and at no stage did the proponent mention that the title claim covered the 10ha of accreted Crown land located immediately east of Lot 1 which, according to the proponent, is critical to the effective future operation of the precinct to allow access by the potential businesses to the river.

Given the claim that the crown land is "critically needed by future businesses to gain access to the river", how does the proposed E2 zoning of the vegetated areas of the crown land leave the proposal?

- \* **Acid Sulphate Soils.** The Proposal document informs us (page 10) that Clarence Valley Council mapped the subject land "*as being class 2 and 3 acid sulphate soils (Australian Soil and Concrete Testing (ASCT, 2008).*



**Aerial view of the 7.5 hectares of sediment holding ponds already constructed to 1.5m deep, on the subject lands.**

We are also told that ASCT, *"assessed the soils in the centre of Lots 3 and 4 in 2008, and while these tests confirmed that, "soils below 1m were generally strongly acidic", ASCT had apparently changed their minds and concluded that, "the soils below 1m were very likely to be **potential** acid sulphate soils, but not **actual** acid sulphate soils."*

We believe this explanation to be highly unsatisfactory.

The change of the composition of the soils from Acid Sulphate to "potential but not actual" acid sulphate soils, has allowed the proponent to justify proposing further excavation and filling to occur across the entire marine precinct proposal. However, we believe an independent soil analysis should have been undertaken to determine the true status of the soils across the entire site, to determine its suitability for development as an industrial site, prior to Council's launching its Gateway application to rezone the land.

We are not given details of the subsequent soil testing that determined the soils on the subject site are not "actual acid sulfate"; the number of samples tested, across what area, etc, so are concerned at Council's apparent acceptance of the proponent's claims that it will be safe to construct pads, roads and, presumably, more toxic sediment ponds on the site similar to the ones that the EPA has required Harwood Slipways to construct.

To understand our concerns it is important to understand the risks attached to establishing an industrial complex on acid sulfate soil.

In an undisturbed state below the water table, acid sulfate soils are benign. However if the soils are drained, excavated or exposed to air by a lowering of the water table, the sulfides react with oxygen to form sulfuric acid. Release of this acid from the soil can in turn release iron, aluminium, and other heavy metals (particularly arsenic) within the soil. Once mobilised in this way, the acid and metals can create a variety of adverse impacts: killing vegetation, seeping into and acidifying groundwater and water bodies, killing fish and other aquatic organisms, and degrading concrete and steel structures to the point of failure.

Despite these known impacts on both the environment and built components of the proposal, Council ignored its own soil mapping, and proceeded with its Gateway application regardless

It should also be noted that in the event of flooding, the subject site is inundated first, and as the water level rises, flood waters flow inland, passing across neighbouring sugar cane fields, carrying any toxic residues from the proposed industrial area with it, including any sulphuric acid that may have been mobilised.

On land that is regularly inundated by flood waters (3 times in the last 3 years, this is no environment where an industry that involves sand-blasting of paintwork, often lead-based; the removal of asbestos; the use of toxic paint strippers, thinners, solvents and paints, can operate in safety, so simply should not be allowed to operate there.

- \* **Sediment disposal.** One of the problems with operation on a floodplain of a river whose catchment consists of highly erodible soils, is sediment deposits. We are told in the Proposal that huge amounts of sediment has to be disposed of following each flood event, and that sediment ponds have been required to be constructed to store the sludge from the Harwood Slipway site.

However, significant doubts have been raised regarding the legality of the 3 large ponds excavated on Lots 3 and 4, which are clearly shown in the two aerial photographs on the above page. The first photograph is known to have been taken in 2009, yet records show that the EPA has only chosen to regularise the use of one sediment pond, on Lot 3 (DP115528). This was added to Harwood Slipway's licence by Notice dated 25 September 2013, specifically to allow the Slipway to dispose of the products of dredging from Clarence River as required under an earlier 2007 order.

It is our understanding that the construction of the ponds took place in 2008, possibly in response to the EPA's order (then the Department of Environment and Conservation). However, it would appear that their construction was not allowable under the Local Environment Plan that was in place at the time (Maclean Shire Council LEP), suggesting the ponds may have been constructed illegally.

Either way, it is **a major concern to us that these ponds, two of which are still not licenced, have seemingly been operating illegally for 5 years. Also, despite the fact that there does not appear to have been any specific existing controls in place, with respect to how the ponds are managed, the 2013 licence for the one pond on Lot 3 fails to add any conditions to ensure an appropriate design for the sediment pond, or how it is to be managed into the future.**

It is also our understanding the both Clarence Valley Council and the EPA have been aware of these problems for some time, along with numerous allegations of ongoing licence breaches, and illegal clearing of river bank vegetation, and have not adequately dealt with what can only be described as repeat offences.

The proposal shows ten raised pads across the site, presumably to house up to ten marine related businesses. Therefore, one question that needs to be asked is, **if the approximately 7ha Harwood Marine site requires an equal area of land (7.5ha) for ponds to store flood sediment, how much land will be required for similar disposal of mud by the other ten; where will those ponds be constructed, and can they be managed safely given the flood prone nature of the site?**

What all of this shows is that operating an industrial complex on a floodplain is fraught with potential for major pollution of the lower river to occur. If one industrial site causes so many problems, what would be the impact of another 10 such complexes? And how much worse will the problem be with the onset of climate change increasing the severity of flooding events through sea level rise, storm surge and more severe weather events, impacts the the project's consultant admits have not been considered.

- \* **Agricultural Land:** The rezoning of mapped prime agricultural land to allow the construction of an industrial estate, is again described as “justifiably inconsistent” with applicable state environmental planning policies. With hundreds of millions of people around the world suffering from malnutrition and starvation, to claim justification for concreting food producing land is immoral.

The fact is the Strategy maps the area as 'significant agricultural land', and identifies the need (page 8) to, “*recognise the value of existing primary industries and ensure land use planning decisions **do not hinder the growth and diversification of primary production***”.

Clearly, the proposal to rezone the subject land for a marine precinct is not consistent with the Mid North Coast Strategy, and again, the Clarence Environment Centre sees no justification for changing the zoning of this mapped prime agricultural land to allow the construction of an unneeded industrial complex.

- \* **Fill:** Like so many floodplain development proposals that require massive amounts of fill, this proposal fails to consider the environmental impacts at the quarry sites. The Consultant rightly identifies that, with the 150km long upgrade of the Pacific Highway from Woolgoolga to Ballina, and a planned eleven hundred home urban development on floodplain at West Yamba, competition for fill over the next few years will be intense.

Many of the quarries in the Clarence Valley are situated on Kangaroo Creek sandstone, most of which are mapped as centres of endemism, with recommendations for 'priority protection' (refer Northern Rivers Biodiversity Management Strategy).

The environmental impacts at those quarry sites as a result of that amount of extraction will be significant. However, those cumulative impacts are never considered when granting development approvals.

- \* **Soils stability:** Even though “Unstable Land” receives a mention in the list of S.117 directions (page 9 of Council's Gateway application), at no stage does Council address that issue in relation to the subject site.

There is evidence of major changes to the river bank alignment over the past 150 years, both through erosion and accretion, on the section of river bank under consideration for rezoning. As much as 100m of accreted land has been deposited in some areas, while some 30m in width has been lost in others.

There is evidence of river bank erosion already impacting the current road, and anecdotal reports that passing heavy vehicles cause windows to rattle and walls crack in nearby homes, reportedly because the water table is so close to the surface across the Island, which means that parts of the island are virtually floating and extremely unstable.

This should have been fully considered by Council prior to making its Gateway application, and is yet another reason why Harwood Island is unsuitable for industrial development.

- \* **Consistency with the Mid North Coast Regional Strategy:** There are repeated claims throughout the marine precinct Proposal that the plan is consistent with the objectives and actions contained within the Mid North Coast Regional Strategy, though more often the claim is that the marine precinct plan is “*justifiably inconsistent*” with the Strategy.

The Strategy identifies (page 3) that: “*increasing numbers of visitors and new residents have been attracted to the **Region’s pristine ocean beaches and its natural and rural hinterland**”, emphasising the need to build on that attraction. River front industrial zones such as that proposed for the marine precinct, are not compatible with those values, or the aims of the Strategy.*”

The Strategy also identifies (page 4) that: “*Outside of reserved and protected areas extensive amounts of high value vegetation provide habitat for a wide range of species including threatened flora and fauna. It is these values, in particular the significance of the coastal environment, that make the Mid North Coast a **special place to be protected**”.* We believe the remnant native vegetation on the subject lands is one such vitally important example.

The Regional Strategy clearly spells out (page 5) the need to avoid development in areas that “*are subject to natural hazards such as **acid sulphate soils, flooding, and coastal inundation and recession ... , associated with climate change***”. Despite clear threats from all of these, the consultants, by their own admission, fail to even consider climate change impacts.

The Strategy identifies the need for industrial development to occur “***at or near the higher order centres***”. The proposed Harwood Marine Precinct is close to 60km from the nearest rail head, and the regional centre of Grafton, while road access to the Pacific Highway is regularly cut by flood-waters.

Clearly, despite claims to the contrary, the marine precinct proposal is not consistent with the Regional Strategy, and does not come close to meeting its objectives.

- \* **Consistency with Council's Clarence Marine Precinct, Clarence River Way Master plan:** The proposal makes the judgement that: “*This planning proposal should be regarded as a logical outcome of the Clarence Marine Precinct, and therefore consistent with it*”.

A study of Council's Clarence Marine Precinct document clearly indicates Council's well considered intent to 'cash in' on tourism, with statements such as: *“The sector's growth potential is linked to tourism”*, and that, *“this combined with the affordability and capacity of the Clarence, opens doors for fresh thinking around moor, boat and drive **particularly targeted at the south east Queensland recreational market.**”*

As well Council identifies (page 7) what it refers to as *“The next big thing”*, *“The shortage of mooring and storage facilities for recreational craft; an established and growing tourism sector, with the prestigious Australian Traveller Magazine awarding Yamba “Best Town in Australia” status. Tourism on the Clarence River includes recreational fishing, water based state and national competitions, community events, adventure sports, eco-tours, sailing, kayaking, canoeing, wakeboarding, river-side markets, house boating and regional food including the famous Yamba Prawns and Woolli Oysters”*.

Council also makes the point that: *“The Clarence Marine Precinct is clearly differentiated from other marine industry precincts”*, citing the quality of the precinct's natural resources, *“with the Clarence being one of the nation's last big, wild and working river systems”*.

Council's Marine Precinct document identifies that: *“The Clarence Valley has seven industrial estates open for business”*. Harwood is not mentioned, nor is there any suggestion that more are needed. However, when making its 'Gateway' application to change the RU1 (rural) zoning of the proposed site to IN4 (working waterways), Council claims that the Harwood marine precinct proposal is consistent with the Clarence River Way Masterplan. That 2008 Masterplan clearly aims to: *“Promote Yamba as the gateway port to the Clarence”*, also making the point that Council intended to: *“Capitalise upon **existing tourism potential, infrastructure and market awareness**”*. The Masterplan identifies strategies to:

- \* *“Promote and develop the port facilities as part of a regional harbour network. Maintain the port as a deepwater anchorage and working port.*
- \* *Provide opportunities for the mini cruise market and develop the port to facilitate regional and international boats with immigration /customs facilities.*
- \* *Expand regional shipbuilding and repair facilities at Yamba by facilitating investment, and promoting the development of a marine industry based cluster”, establishing a, “ new Marina and portside precinct, **between Whiting Beach and Yamba marina”**. Clearly it was not intended to establish the “cluster” on a seriously flood prone part of Harwood Island, on the other side of the river some 17km away by road.*

The Masterplan outlines a clear vision aimed directly at the tourist trade, identifying the following features for its marine industry based cluster:

- *“Mixed use commercial – restaurants/bars/cafes/retail.*
- *Accommodation.*
- *Marina, boating and passive water sports infrastructure;*
- *Public open space, wet and dry play and family areas.*
- *Cycle/walkways/boardwalks – linked where possible Yamba Port to Angourie Beach.*
- *Examine the feasibility of permanent outdoor and river based events infrastructure within Ford Park.*
- *Install public art and interpretation to tell stories of the river and links to the coast”.*

Also, we believe the proposed rezoning of part of the Clarence River off Harwood Island from W2, Recreational Waterways, to W3, Working Waterways, is hardly *“capitalising upon existing tourism potential”*, as envisaged by the Masterplan.

In conclusion therefore, we believe an industrial estate on Harwood Island would, in all respects, be counter to Council's aim to promote the Clarence River as a tourist destination.

Council's previous planning documents, are clearly focused on accommodating the marine precinct to cater for tourism, and to support existing marine industry businesses, not to develop additional industrial complexes. It specifically spells out that: *“The ‘traditional’ view of marine industry precincts is one based on a fixed location. The Clarence Marine Precinct is not limited to a single location, but rather has development possibilities located between the river mouth at Yamba and the City of Grafton. This spread of geography ensures that development will not be limited by artificial boundaries”*.

\* **Council's assessment of consistency with Strategic Planning Framework**

On page 6 of the Gateway Application, Council identifies the criteria which exclude marine based industry development – *“land containing habitats of threatened species, populations, or ecological communities; seagrass, saltmarsh and mangrove areas”*, then states that, *“the subject land appears to satisfy these criteria”*. Given that no flora or fauna survey was undertaken or even required, and that we have identified threatened species, and endangered communities on the subject land, we believe this assessment to be outrageous.

In referring to the mangroves adjacent to Lot 1 of the proposal, Council suggests (page 7) that rezoning to E2 could occur: *“Especially since the proposal suggests it will not be directly developed for marine industries”*. Exactly what industry is being proposed? The marine precinct proposal claims that the river front rezoning is crucial to allow access to the river by the proposed businesses. All this appears somewhat contradictory.

Another of the S.117 restrictions identified by Council is subsection 4.3, **flood-prone land**, but claim that the construction of raised building pads and roads will overcome this problem, despite being told that sea-level rises have not been factored in, and knowing that no modelling has been undertaken to determine what effects, if any, the construction of 2m high pads and roadways will have on flood movement across neighbouring properties (current flood levels reach 1.5m across the subject site).

**Conclusion:**

The Clarence Environment Centre can only conclude that from an environmental view-point, the proposed marine precinct at Harwood Island would have unacceptable impacts, and should not be allowed to proceed.

We also strongly believe that the proposal is neither ecologically sustainable, economically viable in that location, or socially acceptable, with the likelihood of major impacts on the environment, and lives and livelihoods of neighbours which have already suffered deep divisions within their community as a result of the proposal.

Therefore we urge Council to closely scrutinise the Harwood marine precinct proposal, to ensure these negative social and environmental impacts are averted. The Harwood Island river front is no place for an industrial complex, and there simply is no need for it.

Yours sincerely

John Edwards  
Honorary Secretary  
Clarence Environment Centre