



## Gladstone Conservation Council Inc.

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8 October 2017

RE: DRAFT MASTER PLAN and PRELIMINARY DRAFT PORT OVERLAY for the Priority Port of Gladstone

Dear Sir/Madam,

The below is a submission within the public commentary period for the above draft documents.

### The 3 scenarios

The Draft Master Plan for the Priority Port of Gladstone considers 3 different economic scenarios – static growth, mid range growth and high growth. There is an implicit assumption that each of these is as desirable as the others, and that we simply need to accommodate any increase in major industry in the region, whatever the environmental consequences. There is no consideration of providing limits to growth in order to prevent further environmental degradation.

Given that there is currently a rapid transition to renewable energy, and that this rapid transition is happening worldwide and gathering pace, it is vitally important that there is a consideration of a negative growth scenario for Gladstone Port, and an assessment of potential stranded assets. There needs to be a transition plan for these assets to a post fossil fuel economy.

It is not at all clear to us from reading the plan as to what the triggers for each of the 3 scenarios and associated capital works would be. The only obvious evidence based trigger is the “maximum port throughput” figures on page 15 of 151mtpa, 230mtpa and 294mtpa respectively.

We’d also like more clarity about what exactly constitutes “limited duplication of the port’s shipping channel” in Scenario 2 on p15 of the draft Plan.

Another issue which needs to be mentioned is that there is apparent conflict between these 3 items in Scenario 2:

1. *“There is a global shift away from the use of coal, and toward lower carbon intensive and renewable sources of energy to achieve improved emissions”*

This item is repeated in all 3 scenarios and appears to be treated as a given within the plan.

2. *“Potential for technological change to enable ongoing thermal coal due to lower emissions”*

With the current solar projects coming in during competitive tenders at a far lower price than ‘clean coal technology’, we feel this is a bit of a stretch.

3. *“Strong price growth for relevant commodities”*



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Given the port's bulk commodity at present is mostly coal, we can't see how this squares with the worldwide continuous price falls in the renewable sector. Point number 1 – which suggests a worldwide shift away from the use of thermal coal – would suggest that the thermal coal price will remain low for the foreseeable future.

Similarly, we can't see how in Scenario 3, an admitted global shift away from coal, (keeping the price low) squares with the Surat Basin being developed. The assumption that gas prices will increase as well doesn't match with our understanding of how cheap renewable energy is impacting on the world energy market. In addition, a domestic gas reservation law would impact heavily on future exports.

In summary, we do not believe that Scenario 3 is at all likely, and we feel that consideration of a contraction in Port activity needs to be envisaged and planned for, since this is at least as likely as Scenario 3 (high growth).

### The Interface Precinct

We have some serious social justice concerns regarding the interference with landholders' rights in the two interface precincts. We understand that targeted consultation and communication with residents in these areas has not occurred. This is a disgrace.

The older homes in these areas were built long before Gladstone was an industrial port, and to restrict home owners' quiet use and enjoyment and legitimate further development of these properties is very inequitable.

*“Development within this precinct must not hinder the growth or development of port, industrial or supply chain activities”*

This statement is phrased in a way which is entirely backwards, usually heavy industry would be under an obligation not to impact on residential areas, and rightly so.

While minimising noise, light and visual impact is an appropriate obligation to impose on industry with regard to residents, we fail to see how the reciprocal obligation could be enforced or reasonable. What air quality impact on port operations could a residential development have? The concept is absurd and amounts to a removal of landholders rights, possibly to the extent of requiring compensation for the loss.

To mention just a couple of examples:

p24 of the Port Overlay: s4.4.3

PO14 – restrictions on living areas, bedrooms and balconies are unnecessarily restrictive



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PO16 – demanding air conditioning instead of better air quality outcomes from the port is appalling.

The interface precinct concept is fundamentally flawed and the local government planning schemes are more than adequate to address development in these areas without adding an extra layer of complexity and difficulty. Accordingly we recommend that the interface precinct be removed from the maps and the concept scrapped altogether.

### The Bridge

We cannot understand why yet again this concept is on the agenda, albeit only for Scenario 3. We well remember the process when the gas plants were placed on Curtis Island over the objections of the community, and the bridge was a large issue at the time.

One of the problems is that it will interfere with the water movement up the Narrows, and another objection at the time was to do with movement of small shipping. Gladstone Conservation Council's primary objection is to do with biodiversity conservation and weed and feral animal control. It isn't hard to envision the impact that unrestricted human access would have on delicate coastal ecosystems and the National Park and State Forest – more fires, more litter, more 4WD damage, more weeds, more pests. We appreciate that residents would probably like some road access, but the World Heritage nature of the Island means that we need to think globally on this issue and take into account more than convenience.

### Environmental Management Precinct

The continued use and extension of the Environmental Management Precinct concept is concerning to us. We acknowledge that the intent of delineating such areas is to provide some measure of protection. We also acknowledge the moving of a large parcel of EMP land on Curtis Island into the National Park system.

The problem remains that an EMP provides no formal legislative protection on the level of a State Forest or National Park. It is unclear what resources, for example, will be implemented to protect the Aldoga Reserve Parcel from fire, human impact, or weeds management (PMM8, p21 Port Overlay, Lot 87 SP144431)

A Land Use Plan by 2020 will be of no use whatsoever if the vegetation is removed by wildfire. Satellite data shows evidence of fires in the immediate vicinity in recent weeks, and if the area is properly managed, it will need at the very least some fuel reduction management strategies.



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### Conclusions

We appreciate that the Master Planning Process has come out of the Reef 2050 Plan, but we fail to see how the current draft reflects anything except justification for a business as usual scenario for Gladstone Port.

It doesn't suggest any significant changes which would protect the Reef in any significant way, and it suggests capital works (Bridge, Channel Duplication) which would have serious negative impacts on the Reef ecosystem and island ecology.

It doesn't deal with a very real possibility that fossil fuels will enter an economic 'death spiral' with flow on effects to the Port.

It creates a serious social justice issue for selected residents.

It provides no clear direction on the resources which will be employed to protect areas which are designated as EMP.

We hope that the submissions from the local community as well as our own will be taken into account and the plan altered significantly so that it acts in a way which will protect the Reef into the future.

Yours Sincerely,

Anna Hitchcock

On behalf of

Gladstone Conservation Council