



Tasmania

A Submission To

**Resource Planning and Development
Commission Assessment of the Walker
Corporation DIIS for a proposal to destroy the
Ralphs Bay Conservation Area and construct
Tasmania's first canal housing estate**



Ralphs Bay, ©David Jamrozik

Presented By

Cassy O'Connor MP

Tasmanian Greens Environment and Coastal Policy Spokesperson

On

6 April 2009

Contents

Executive Summary	4
Obligations under the Resource Management and Planning System of Tasmania	5
The Precautionary Principle	6
Tasmanian State Coastal Policy	8
Legislative framework	9
DIIS Deficiencies - Overview	10
DIIS – Executive Summary	12
DIIS – 1.7 Public Consultations and Participation	14
DIIS - 4 Description of the Proposal	15
DIIS - 5 Potential Environmental Impacts and Their Management	17
DIIS - 5.6 Traffic	19
DIIS - 5.9 Waste	19
DIIS - 5.10 Terrestrial Ecology	20
DIIS - 5.11 Avian (Wader) Ecology	21
DIIS - 5.12 Aquatic Ecology	23
DIIS - 7 Economic Impacts	25
DIIS - 8 Social and Community Impacts	26
DIIS - 8.4 Health Impact Assessment	28
Conclusion	29
Appendices	32

Executive Summary

As the Tasmanian Greens' Coastal Policy spokesperson, I make this submission to the Commission on behalf of the Tasmanian Greens, to represent the interests of the tidal flat ecology of the Ralphs Bay Conservation Area, coastal values in Tasmania and the community of concerned Tasmanians who are committed to the preservation of both.

I also wish to be called to give evidence at public hearings on the DIIS response, scheduled for June this year.

It has not been feasible in the time available to undertake the most thorough possible examination of the Walker Corporation Draft Integrated Impact Statement (DIIS), including all its appendices, so this submission will focus on glaring deficiencies in the documentation as well as key environmental, social and economic issues associated with this destructive, divisive proposal.

The Tasmanian Greens have engaged the independent expertise of Professor Rodger Tomlinson, Director of the Centre for Coastal Management at Griffith University School of the Environment, Gold Coast Campus. Professor Tomlinson's preliminary comments on Section 5 of the DIIS and associated appendices are attached as Appendix A to this submission. We request that he be called as an expert witness to present during the public hearing period.

The Tasmanian Greens submit that the Walker Corporation proposal fails the triple bottom line, net benefit test; that it is environmentally, socially and economically unjustifiable, and that the Commission must reject it on the basis of the Precautionary Principle, in line with contemporary scientific understanding of coastal processes and the enormous value of the Ralphs Bay estuarine ecosystem to the River Derwent and to Tasmania.

The certain negative, irreversible impact of this development is unacceptable by 21st Century planning and policy standards.

In preparing this representation to the RPDC, the Tasmanian Greens wish to acknowledge the important work of those organisations which have committed scarce time and resources to the preservation of Ralphs Bay, and protection of coastal values in Tasmania.

We place enormous value on the collective contribution of Save Ralphs Bay Inc., Birds Tasmania, the Environmental Defenders' Office, Tasmanian Conservation Trust, Environment Tasmania, The Wilderness Society, the Marine Naturalists' Society, and Coastview Tasmania.

The Tasmanian Greens also thank and pay tribute to all those thinking and concerned Tasmanians who through their words and deeds are supporting the campaign to save Ralphs Bay.

Obligations under the Resource Management and Planning System of Tasmania

The Tasmanian community expects the Commission to meet its obligations under the Resource Management and Planning System (RMPS) of Tasmania, *“to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity.”*¹

The Walker Corporation proposal to drain, excavate, dredge and fill the delicate ecology of the Ralphs Bay tidal flats is unsustainable. This truth is borne out by rational analysis and by the actions of the New South Wales² and Victorian governments³, which have acted to ban canal and marina developments on environmental and economic grounds.

The impact of this project on the ecological processes of Ralphs Bay and the River Derwent would be undeniably devastating, in direct contravention of the RMPS objectives, the core tenets of the *Tasmanian State Coastal Policy 1996*, and a number of other important, relevant legal instruments.

The Commission is also obliged under the RMPS to make its determination based on the need to:

- Sustain the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations
- Safeguard the life-supporting capacity of air, water, soil and ecosystems
- Avoid, remedy or mitigate the effect of any adverse activities on the environment

In assessing the merits or otherwise of the Walker Corporation Project of State Significance (PoSS), the Panel must abide by the RMPS principles⁴ of:

- Inter-generational equity,
- The conservation of biodiversity,
- The Precautionary approach,
- Social equity,
- Efficiency, and
- Community participation.

The Tasmanian Greens submit that the Walker Corporation proposal fails on all counts.

¹ Guide to the Resource Management and Planning System, 3.2 Objectives of the RMPS

² New South Wales State Environmental Planning Policy (SEPP) 50 (1997)

³ Victorian Coastal Strategy 2008, p. 39

⁴ 3.4 Principles involved in applying the RMPS

The Precautionary Principle

It is the unequivocal view of the Tasmanian Greens that the Walker Corporation proposal to destroy the tidal flats of Ralphs Bay at Lauderdale not only poses an unacceptable threat to natural processes and biodiversity, it also has significant potential to compromise the ecological health of the wider Derwent Estuary, in its southern reaches particularly.

While the proponent's DIIS seeks to isolate the proposed construction and development zone from consideration of wider environmental impacts, citing 'negligible' impacts, the Tasmanian Greens point the Commission to the State of the Environment (SoE) Report 2003, the State of the Derwent Report 2004, the Water Quality Improvement Plan for the Derwent Estuary, the ongoing work of the Derwent Estuary Program (DEP) and the RPDC Background Report on the Bruny Bioregion, which reproduces a CSIRO diagram of the general circulation pattern of waters in and around the Derwent Estuary. It demonstrates that water circulates from Ralphs Bay and into Frederick Henry Bay.⁵

The Tasmanian Greens share the widely held concern that contaminated sediment disturbance and sediment plumes from the proposed construction site will affect the ecology and water quality of Ralphs Bay, the River Derwent and Frederick Henry Bay, including Pipeclay Lagoon.

Given the significant public and environmental health issues associated with the excavation, draining, construction and dredging of Ralphs Bay, the Tasmanian Greens call on the RPDC assessment panel to query every assertion in the DIIS of 'negligible' or 'unlikely' impacts.

Organisations and individuals with more expertise in sediment composition, transport and marine hydrodynamics than the Tasmanian Greens, and with more independent rigour than the proponent, will test the DIIS' assertions of engineering solutions and unlikely, or negligible impacts. We argue that the risk is to high.

The Tasmanian Greens believe the RPDC is empowered to reject the Walker Corporation proposal on the basis of the Precautionary Principle.

The Precautionary Principle is a moral and political principle which states that if an action or policy might cause severe or irreversible harm to the environment and therefore to human wellbeing, in the absence of a scientific consensus that harm would not ensue, the burden of proof falls on those who would advocate taking the action.

The most widely used description of the Precautionary Principle is found in Principle 15 of the Rio Declaration of Environment and Development of 1992:

"In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation."

The *State Coastal Policy 1996* cites the Rio definition, stating:

⁵ Background Report on the Establishment of Marine Protected Areas in the Bruny Bioregion, RPDC 2007, Figure 6 General circulation pattern for coastal waters in southeast Tasmania p.24

“precautionary principle” means where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

In the application of the precautionary principle, public and private decisions should be guided by:

- 1. careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment; and*
- 2. an assessment of the risk-weighted consequences of various options.*

In assessing the DIIS and the merits of the Lauderdale Quay proposal, the RPDC must acknowledge the threat of serious or irreversible environmental damage to a critical part of the Derwent Estuary.

There is a demonstrable lack of full scientific certainty in the DIIS construction engineering and proposed environmental mitigation measures, but considerable scientific certainty in coastal management circles, and governments interstate, about the irreversible damage caused to coastal environments by canal and marina developments.⁶

The DIIS also applies outdated science on projected sea level rise over the next century. Its reliance on the IPCC AR4 (2007)⁷ to set a ‘mid-range’ projection of 0.5 M to plan for islands built to 2.5M above HWM, ignores current scientific understanding as well as potential for accelerated rising caused by dynamic ice losses.

Climate change researchers from more than 70 nations recently met at the University of Copenhagen for the International Scientific Congress on Climate Change, “Climate Change: Global Risks, Challenges and Decisions.” The Congress was presented with evidence that sea level rise is accelerating, and that the Greenland and Antarctic icesheets are melting at an accelerating pace.

The concluding statement of the Congress finds that, *“Research presented today at the International Scientific Congress on Climate Change in Copenhagen shows that the upper range of sea level rise by 2100 could be in the range of about one metre, or possibly more. In the lower end of the spectrum it looks increasingly unlikely that sea level rise will be much less than 50 cm by 2100.”*⁸

The Precautionary Principle must also be applied on the basis that the proposed development does not adequately account for sea level rise risk, and consequently would also pose an unacceptable social and economic risk in the future.

A comprehensive weighting of risk associated with this proposal will determine the risk to biodiversity, estuarine ecosystem services, water quality and public health and wellbeing, is unacceptably high.

⁶ Appleyard, Dr. S., *‘Biogeochemical changes and potential environmental effects resulting from the construction of canal estates and marinas in coastal areas’*. Submission to the RPDC, March 2009

⁷ IPCC, *Climate Change 2007: The Physical Science Basis, Fourth Assessment Report, 2007*

⁸ *Rising sea levels set to have major impacts around the world*, Media Release, Climate Change: Global Risks, Challenges and Decisions, International Science Congress, Copenhagen, 10-12 March 2009

Tasmanian State Coastal Policy 1996

The *Tasmanian State Coastal Policy 1996* states:

(1.1.2) The coastal zone will be managed to protect ecological, geomorphologic and geological coastal features and aquatic environments of conservation value.

(1.1.3) Conservation and protection of migratory species and rare, vulnerable and endangered species.

(1.1.9) Important coastal wetlands will be identified, protected, repaired and managed.

(2.1.1) It is acknowledged that there are conservation reserves and other areas in the coastal zone which will not be available for development.

(2.1.5) Application of the Precautionary Principle to development that may pose serious or irreversible risk.

(2.7.1) All future use and development of public land in the coastal zone will be consistent with this policy.

The Tasmanian Greens submit that the Walker Corporation Project of State Significance contravenes each of these provisions of the *State Coastal Policy 1996*.



©David Jamrozik

Legislative Framework

The Tasmanian Greens submit that the Walker Corporation Project of State Significance is contrary to the provisions and/or objectives of:

- *The Tasmanian Resource Management and Planning System*
- *The Tasmanian State Coastal Policy 1996*
- *The Threatened Species Protection Act 1995*
- *The Environment Protection and Biodiversity Conservation Act 1999*
- *The Register of the National Estate*
- *The Regional Forest Agreement 1997*
- *The State of the Environment Report 2003*
- *The State of the Derwent Report 2004*
- *The State and Commonwealth Water Quality Improvement Plan for the Derwent Estuary*
- *International Migratory Bird Agreements with Japan, China and the Republic of South Korea*

In its DIIS and associated appendices, the proponent has not demonstrated adequately compliance with any of the above legal instruments.

While this proposal is being assessed as a Project of State Significance and therefore in a unique, exclusive legal category, it cannot be examined in isolation of the legislative framework, and any approval that contravened State and/or Commonwealth obligations would be open to judicial appeal.

DIIS Deficiencies - Overview

1. It is clear from rational examination of the DIIS - even within the limited time available - as well as a number of representations already made to the RPDC and publicly available, that the proponent has presented deficient information concerning potential environmental, social and economic impacts.
2. The deficiencies in the information presented in the DIIS and Appendices are compounded by the fact that a number of studies are still currently being undertaken by the proponent, which has resulted in submissions being exhaustively prepared in too little available time, on incomplete information.
3. Negative environmental impacts associated with the destruction of a sandflat ecosystem and internationally significant shorebird and marine habitat, as well as the potential release of contaminated sediments into the River Derwent, are dismissed by the proponent in the Executive Summary as "*no significant adverse impacts*"⁹, or able to be mitigated or offset through mechanisms which are clearly inadequate replacement for what would be lost.
4. The status, extent¹⁰ and ecological values of the Ralphs Bay Conservation Area are consistently misrepresented in the DIIS.¹¹
5. The proponent also fails to acknowledge that Ralphs Bay is a critical part of the wider Derwent Estuary, as detailed in the State of the Derwent Report 2004, the State of the Environment Report 2003, the Water Quality Improvement Plan for the Derwent Estuary and the ongoing work of the Derwent Estuary Program.
6. The intense level of community angst about the Walker Corporation proposal, manifested in community surveys, media commentary and well attended public meetings over the past five years, is glossed over by the proponent which makes no acknowledgment of the community's strong, existing sense of place or the distress caused by its persistence with this aggressive, unsustainable development proposal.
7. Nowhere in the DIIS is the proponent honest about the depth and breadth of objection to the proposed destruction of the Ralphs Bay Conservation Area and loss of a critical habitat; the privatisation of Crown Land publicly owned coastline; the negative health and wellbeing impact of a prolonged construction period on residents and on the children attending Lauderdale Primary School; the loss of a treasured view of Mount Wellington; the loss of a peaceful, coastal lifestyle; loss of a highly valued recreational wind surfing area; and the precedent that approval and construction of this canal housing estate would set for other coastal areas in Tasmania.
8. While the negative environmental and social impacts are downplayed in the DIIS, the alleged economic benefits of the proposal are, in the opinion of the Tasmanian Greens, significantly overstated, while at the same time, ignoring contemporary economic understanding of the definable dollar value of the ecosystem services provided by estuarine environments such as that at Ralphs Bay.^{12 13}

⁹ DIIS, Executive Summary, p. XVIII

¹⁰ DIIS, p.214

¹¹ DIIS. p.34

¹² Costanza et al, The Value of the World's Ecosystem Services and Natural Capital, 1997

9. In addition, the Walker Corporation DIIS fails to argue convincingly the 'need'¹⁴ for its proposed canal housing estate and marina inside the Ralphs Bay Conservation Area, as it is required to do under the RPDC Final Scope Guidelines.
10. In an age of climate change and certain sea level rise, it cannot be argued that there is a 'need' to locate more people along the coastline and that this should be achieved through profound and irreversible damage to coastal environments. Indeed, the reverse is the case, with governments interstate moving to establish policy frameworks that specifically aim to prevent further development along the vulnerable coastal strip.
11. In planning terms, there is certainly a need for more affordable (and sustainable) housing in Tasmania, but there is no provision for this in the DIIS or project outline. Instead, the proponent states that, "*Lauderdale Quay is expected to appeal to the medium/top end of the market sector ..*"¹⁵ It is a fact that this end of the market is extremely limited in Tasmania, and currently shrinking the world over due to the global recession.
12. There is, quite simply, no 'need' for a critical estuarine ecosystem to be destroyed and replaced with a 150 hectare, 477 lot canal housing estate and marina inside the Ralphs Bay Conservation Area, just as there is no 'need' for canal estates in Tasmania, and no allowance for their approval or construction in New South Wales and Victoria - where they are now banned.

¹³ Blackwell, Boyd Dirk, *The Economic Value of Australia's Natural Coastal Assets*, 2005

¹⁴ DIIS Executive Summary, pVI

DIIS, p. 72 - 78

¹⁵ Ibid

DIIS - Executive Summary

Throughout the DIIS Executive Summary and the DIIS itself, the proponent erroneously implies it has engaged fully in a public consultation process and that this process has been integral to its project response.

Walker Corporation states, *"Over the past five years, Walker Corp has undertaken extensive and thorough public consultation and stakeholder engagement. The evolution of the master plan at the locality has reduced the site extent and holdings to the northern intertidal and subtidal proportion of Ralphs Bay ..."*¹⁶ (That section is the Ralphs Bay Conservation Area, and the actual footprint of the proposed development - at +/- 150 hectares - is not substantially different from the proposals put forward in 2004 and 2006).

The Tasmanian Greens submit that the proponent has in fact largely ignored the feedback it has received, paying only lip service to the overwhelming rejection by the South Arm peninsula community of the Lauderdale Quay concept, and all it potentially entails.

The community group, Save Ralphs Bay (SRB) Inc., has been at the community interface for the past five years - undertaking genuine and extensive engagement with local residents, as well as the wider community. In the process, SRB has come into contact with thousands of people who have expressed a strong, consistent view that the Walker Corporation proposal is not worth the risk to Ralphs Bay, the River Derwent, Tasmania's coastline and the communities it sustains.

It is a widely held view that the plan to construct a Gold Coast-style canal housing estate and marina inside the Ralphs Bay Conservation Area is 'un-Tasmanian.'

If Walker Corporation was genuinely listening to community concern, it would not have submitted its proposal for assessment as a Project of State Significance and its legal team would not have approached the Tasmanian Labor Government querying the boundary and status of the Ralphs Bay Conservation Area in 2005.

Under 'The Objectives'¹⁷, the proponent states that the aim is to, *"provide new and improved residential and lifestyle, commercial and recreational opportunities in Lauderdale .."* as if the currently much-treasured coastal township lifestyle - with ease of access to Hobart city - needs improving. It also cannot be sanely argued that a staged development projected to span out to 2028 will improve residential amenity for South Arm peninsula residents.

The objective of creating *"... a new community with distinct identity and character ..."* is uninvited by the existing South Arm peninsula community which already has its own, valued and distinct identity and character. The strong, abiding sense of place felt by so many peninsula residents has been wholly ignored in the DIIS proposal objectives and in the proponent's assessment of potential social impacts.

The objective of expanding *"... upon the existing public open space ..."* conveniently ignores the reality of a proposal to shrink the public open space of Ralphs Bay at Lauderdale and privatise an existing area of Crown Land, owned by the people of Tasmania, to which they already have right of access for recreational purposes.

¹⁶ Ibid, p. II

¹⁷ DIIS Executive Summary, p. II

Walker Corporation proposes to “... *deliver a sustainable, safe and pleasant working, living and recreational environment ...*” It can easily be argued that this already exists at Lauderdale. It is also clear the proponent does not understand the meaning of the term ‘sustainable’. Interstate experience demonstrates that canal housing estates in the coastal zone are not sustainable, nor are they safe from storm surge inundation and sea level rise. The healthy sandflat ecosystem of Ralphs Bay at Lauderdale is already functioning sustainably to support a rich diversity of fauna and flora.

Perhaps the most insulting of the stated objectives is “... *to establish a community that acknowledges a sense of ownership and responsibility to the urban, social and natural environment ...*” This is precisely the reason that Save Ralphs Bay Inc. was formed! It is the reason that hundreds of local residents attend SRB public meetings and rallies. The proposal to privatise and destroy the Ralphs Bay tidal flats at Lauderdale deeply offends this sense of community ownership and responsibility. The suggestion that this currently does not exist, is plainly wrong.

If Walker Corporation can “... *create a self-managing environment that minimises ongoing costs, demands upon infrastructure and maintenance ...*” it will be a first for canal housing and marina construction in Australia. The governments of New South Wales and Victoria have banned canal estates, and Queensland has severely restricted them, in part because these developments are anything but ‘self-managing’ and low maintenance.

DIIS - 1.7 Public Consultation and Participation

As previously stated, the Tasmanian Greens are certain that Walker Corporation has engaged in a disingenuous, evasive public consultation process.

The absence of community response data is noted, as is the lack of any acknowledgment of the strong feelings expressed by a broad range of community members to the proponent, in written and verbal form, during its public information events.

While the proponent repeatedly implies opposition to the project stems from a vocal minority, it fails to produce any evidence to suggest the Lauderdale Quay development has either significant local support, or that of the wider Tasmanian community.

In contrast, community surveys undertaken by State and Federal MPs, Will Hodgman, Harry Quick and Paul Calvert, between 2004 - 06 found, on average, 70% opposition to the proposal.

Cumulatively over five years, thousands of Tasmanians and concerned individuals from interstate and overseas, have expressed their opposition to this proposal through correspondence with government (i.e. +/- 2400 letters to then Environment Minister, Judy Jackson in August 2005); previous submissions to the RPDC PoSS assessment and Marine Protected Areas Inquiry; signing up to www.saveralphsbay.org and/or submitting feedback through the website; calls to ABC Local Radio talkback and strongly worded letters to the *Mercury* newspaper; at often packed, always well attended, SRB public meetings and rallies on both sides of the River Derwent.

The evidence of an overwhelming mood of opposition to the Walker Corporation proposal is irrefutable. The developer has no 'social license' for its canal housing estate and marina proposal for Ralphs Bay.

The Commission is encouraged to request the proponent provide the original community feedback documentation from its public events in order to establish a more accurate measure of the level of public support for the Lauderdale Quay proposal.

DIIS - 4 Description of the Proposal

This section of the DIIS makes it clear that Walker Corporation proposes a massive engineering and construction program on a scale unprecedented for Tasmania's coastline. It also fails to reassure the reader that major adverse impacts will not result if this development were to proceed.

The project description fails to describe the Ralphs Bay Conservation Area as the project area.¹⁸

The numbers involved are alarming - they include, the extraction of 2,000,000 cubic metres of material across a total development footprint of 146.5 hectares, to construct seven artificial islands and a 1.3 km long, 250 metre wide navigation channel, servicing 477 residential allotments and 3 commercial areas.¹⁹

A more honest description of the proposal might begin something like, "*Walker Corporation proposes to buy the Ralphs Bay Conservation Area (the status of which our lawyers sought to muddy the waters over, and which we to this day do not appropriately acknowledge)*"²⁰ from the Tasmanian Government against the will of a significant, if not majority, percentage of the local community and the rightful owners of the Crown Land in question, the Tasmanian people.

If it obtains planning approval for its proposed 480 lot canal housing estate and marina like the ones you see at Surfers Paradise in Queensland, Yunderup in W.A. and the failed developments that led to canal estate bans in NSW and Victoria, Walker Corporation engineering and construction teams, largely from interstate, will attempt to seal off, drain, excavate, dredge and in-fill the Ralphs Bay tidal flats over a +/- 18 year staged construction and development, meeting the demands of a market that Walker Corporation is prepared to speculate will be there in the future, despite the limited market locally for high-end properties and the global recession.

This process, which the proponent believes is almost as vital to the future economic prosperity of Tasmania as it is to Walker Corporation's bottom line, will inevitably lead to higher stress levels among local residents. Commuters, particularly, will experience significant delays due to the scale of construction in the former Conservation Area adjacent to South Arm Road, while post-construction impacts of increased residential traffic volume may require the construction of new lanes on the Tasman Bridge.

Children attending Lauderdale Primary School will certainly be aware of the construction zone just over South Arm Road, but Walker Corporation wishes to reassure parents that it has the engineering solutions to minimise the negative impacts on young children of a prolonged period of excavation, noise, vibration, dust and heavy vehicle traffic.

Resident and migratory shorebirds will be displaced from their natural feeding and roosting grounds on the Ralphs Bay tidal flats, and a percentage will die²¹, in numbers the DIIS cannot project, but they were in trouble due to future sea level rise anyway.²² Walker Corporation also believes this is an acceptable tradeoff for the projected economic benefits (see above), but it is prepared to spend a small amount of

¹⁸ Hansard, Parliament of Tasmania, *Ralphs Bay Conservation Area (Clarification) Bill 2006*, Second Reading, 31 August 2006

¹⁹ DIIS 4.3 Construction (Civil Works) p.91

²⁰ Appendix II, Legal Opinion on the Status of the Ralphs Bay Conservation Area, Duncan Kerr SC MP

²¹ DIIS 5.11.3 Potential Impacts, p. 261

²² 5.11.2 Climate Change Implications, p. 253

money, relative to the cost scale of the project, to undertake - untested to local conditions - mitigation and offset measures in an area of Ralphs Bay that is not currently considered suitable for development.

The critically endangered Spotted Handfish is a matter of national environmental concern, and disturbance of sediments and prevalence of the Northern Pacific Seastars around built marine structures are considered key threats to its survival in the Derwent Estuary and associated waters.²³ Walker Corporation acknowledges that sediments may be disturbed during stages of the development's construction and that there is a risk to the nearby population of this threatened species, but it is only a 'moderate' one.²⁴

Given the restrictions placed on canal estate and marina developments interstate, Walker Corporation sees its Lauderdale Quay development as just the beginning of plans it has for Tasmania's unspoiled, publicly-owned coastline²⁵



© Thomas Moore

²³ State and Commonwealth Draft Spotted Handfish Recovery Plan, p.25

²⁴ DIIS, Appendix T2, Table 6.2, Marine and Estuarine Ecosystems and Species Impact Mitigation Measures for the Lauderdale Quay Development

²⁵ Tasmanian Parliamentary Library, Media Monitoring Transcript, ABC Tas Mornings interview with Kevin Hunt and Lia Morris, 7 July 2006

DIIS - 5 Potential Environmental Impacts and Their Management

* See Appendix I. Professor Rodger Tomlinson, Submission on behalf of the Tasmanian Greens to the Resource Planning and Development Commission in regard to the Lauderdale Quay development in Ralph's Bay, Tasmania.

It is not possible to accurately assess the potential environmental impacts of the proposal to remove the Ralphs Bay tidal flats and undertake a +/-18 year staged construction without first gaining a comprehensive understanding of the area's true ecological significance. Whether deliberately or otherwise and although it describes key ecological features, the DIIS fails to establish this foundation.

The RPDC Interim Report on the Bruny Bioregion identified seven marine sites of ecological importance around the South Arm Peninsula, including the tidal flats of the Ralphs Bay Conservation Area.

Its values are also recognised in the State of the Derwent and State of the Environment Reports, forty years of data sets undertaken by Birds Tasmania, the Register of the National Estate, National Heritage Database, the *Environment Protection and Biodiversity Conservation Act 1999*, the Draft Spotted Handfish Recovery Plan, and international agreements, including the Japan Australia Migratory Bird Agreement (JAMBA), China Australia Migratory Bird Agreement (CAMBA) and the Republic of Korea Australia Migratory Bird Agreement (ROKAMBA).

The State of the Environment (SoE) Report 2003 also recognises the critical importance of estuarine ecosystems such as that at Ralphs Bay, stating, *"Tasmania's estuaries and marine ecosystems are some of the most diverse on earth ... we benefit through fishing resources, aquaculture, recreation, transport and tourism ... Costanza and Folke (1997) estimated the economic value of 17 ecosystem services for 16 biomes or habitat. The values indicate that natural coastal environments, particularly those in estuaries, are easily among the most valuable on earth.*

The SoE Report goes on to warn, *"However, the significant lack of knowledge in Tasmania about coastal, estuarine and marine ecology, and the condition of that ecology, creates uncertainty about how to manage human impacts."*²⁶

This recognition of the importance and vulnerability of Ralphs Bay in the Tasmanian Government's own reports adds further weight to the argument for employing the Precautionary Principle in rejecting this proposed development.

Interstate experience with similar developments in coastal areas led to two key policy changes, banning canal estates. First, in New South Wales with State Environmental Planning Policy (SEPP) 50 in 1997:

"Regulation 5 Canal estate development prohibited

A person must not carry out canal estate development."

And, late last year the Victorian Government released its new Coastal Strategy. It specifically bans canal and marina developments. It states:

"In particular, it is policy in this strategy to identify and avoid development in areas susceptible to flooding, landslip, erosion bush-fire or geotechnical risk and avoid disturbing coastal acid sulfate

²⁶ State of the Environment Report (Tasmania) 2003, Summary Report and Recommendations, p. 7.5

soils (CASS). It is also policy to prohibit the development of new residential canal estates to ensure the protection of coastal and estuarine environments. Canal estates can have major adverse impacts on the host estuary, causing loss of habitat, polluting estuarine waters by urban runoff and boating activities and disturbing coastal acid sulfate soils."²⁷

Developers are banned from constructing canal housing estates in Victoria and NSW because these developments cause water quality problems from both dredging and household runoff pollution, damage to fisheries, the enduring economic and environmental damage caused by coastal acid sulphate soils, wetland habitat destruction, loss of rare flora and fauna, erosion of adjacent coastline, loss of public access, long-term financial and management headaches for local and state governments²⁸.

In his personal submission to the RPDC, Dr Steve Appleyard, Principal Hydrogeologist with the W.A. Department of Environment and Conservation and Adjunct Associate Professor with the School of Earth and Geographical Sciences at the University of Western Australia, details a number of the serious and enduring environmental problems, and consequent economic costs, associated with canal housing estate construction and operation in Western Australia.²⁹

Dr Appleyard states, *"The construction and ongoing management of canals and marinas frequently leads to long-term water quality problems which can be reduced through appropriate engineering measures, but often not entirely eliminated. Experience in Western Australia has indicated that this typically leads to ongoing environmental impacts and management costs that were not considered in the original development proposal. It is important that this is recognised by regulatory agencies when balancing the environmental, social and economic consequences of developments of this type."*

The potential for the release of sediments, and sediment plumes, into Ralphs Bay and the River Derwent, extending around to Frederick Henry Bay remains a primary concern of the Tasmanian Greens. While we do not have the scientific expertise to undertake our own expert critique of Walker Corporation's assurance of negligible or minimal risk, or impacts, we believe the risk remains high and refer the Commission to the extensive work already undertaken by the Derwent Estuary Program.

The Tasmanian Greens submit that, on the basis of available science and policy, as well as a comprehensive understanding of the ecological significance of the Ralphs Bay tidal flats, under the RMPS objectives the Commission is obliged to reject the Walker Corporation PoSS.

²⁷ Victorian Coastal Strategy 2008, p. 39

²⁸ Ramsar Topics no. 1: Report on Canal Estates, July 1998 http://www.ramsar.org/wurc/wurc_topic_1_report.htm

²⁹ Appleyard, Dr. S, 'Biogeochemical changes and potential environmental effects resulting from the construction of canal estates and marinas in coastal areas', RPDC Submission, April 2009

DIIS - 5.6 Traffic

The Tasmanian Greens share the community's concern that the proposed development would lead to major disruptions to the flow of traffic from South Arm through to the city of Hobart, with potential implications for road safety.

The excavation and construction period in particular would inevitably result in significant numbers of heavy vehicle movements along the narrow South Arm Road at Lauderdale, and to connected road networks, depending on where waste and construction materials are being transported from and to. This prolonged, intensive engineering and construction activity directly adjacent to Lauderdale Primary School.

In the unlikely event that there proved to be a market for blocks on the nearest canal estate to Antarctica, and hundreds of buyers moved onto islands built on the grave of the Ralphs Bay Conservation Area, extra car trips along an already stretched road system would climb into the thousands. The Tasman Bridge and its eastern approaches are already at capacity.

The Tasmanian Greens suggest that the Commission seeks comprehensive briefs from the Department of Infrastructure, Energy and Resources (DIER), as well as Road Safety Tasmania and the Royal Automobile Club of Tasmania (RACT) on current road capacity and road safety concerns in the vicinity of the proposed development, extending to the Tasman Bridge and CBD.

DIIS - 5.9 Waste

The proponent's inability to acknowledge the ecosystem values of the Ralphs Bay tidal flats and the waste management failures blighting such developments interstate, are further revealed in this section of the document.

For an expert view on the waste management risks and proposed mitigation strategies proposed, the Tasmanian Greens refer the Commission to the work of Dr Steve Appleyard in his personal submission on the Walker Corporation PoSS assessment, and to the representation made to the RPDC by Dr Robert Howarth and Dr Roxanne Merino³⁰

³⁰ Howarth, E, Merino, R. *"Submission on the Draft Integrated Impact Statement for the Proposed Lauderdale Quay Development at Ralphs Bay"*, RPDC Submission No 124, 30 March 2009

DIIS - 5.10 Terrestrial Ecology

The saltmarsh, sedgeland, rushlands and coastal woodlands around Ralphs Bay represent key habitat for endemic plant, animal, aquatic and insect species, a number of which are protected either under the Tasmanian *Threatened Species Protection Act 1995*, the *Nature Conservation Act 2002* and the *Environment Protection and Biodiversity Conservation Act 1999*.

The significance to the wider Derwent Estuary of the tidal flat and vegetation communities of Ralphs Bay is also detailed in the State of the Derwent Report 2004.

The DIIS makes it clear these vegetation communities will be severely affected in parts, and therefore the whole will be compromised, as a result of the proposed construction and operation of Lauderdale Quay. This would inevitably have a negative impact on the terrestrial ecology and biodiversity of Ralphs Bay.

DIIS - 5.11 Avian (Wader) Ecology

As previously stated, the Tasmanian Greens believe the Walker Corporation proposal poses a certain, unacceptable risk to resident and migratory shorebirds reliant on the tidal flats of Ralphs Bay.

We refer the Commission to the four decades of data sets undertaken by Birds Tasmania on Ralphs Bay, and to Birds Tasmania's submission to the DIIS assessment process which reveals serious flaws in the proponent's avian ecology work and the denied certainty of profound negative impacts on resident and migratory species, a number of them also listed as 'threatened'.

Further into the DIIS, the proponent again expects the reader to suspend disbelief, stating, *"Technical examination and documentation identify little risk of significant fauna disturbance."*³¹

In the Birds Tasmania submission, Chair, Dr Eric Woehler finds significant flaws in the information presented by the proponent in the DIIS:

"The Commission must adhere to the core Precautionary Principle of the State Coastal Policy and reject the Walker Corporation proposal outright, and establish the Ralphs Bay Conservation Area to include the entire inter-tidal area used by hundreds of resident species and thousands of migratory species as feeding, nesting and roosting habitat.

4. Disparity in numbers of shorebirds, survey issues

- 4.1 *Surveys for the proponent reported approximately half of the Pied Oystercatchers reported by Birds Tasmania. This disparity in numbers is due to the survey method used by Walker's consultants – they were unable to visit all sites in southeast Tasmania simultaneously (as is done for Birds Tasmania surveys), and hence they were unable to obtain an accurate estimate of the total numbers of birds using the various sites surveyed, and substantially under-estimated the significance of Ralphs Bay to the tune of 50% for the Pied Oystercatcher, a resident species.*
- 4.2 *We believe that all of the shorebird surveys conducted for the proponent are hopelessly inadequate, and do not provide the data required to address the impacts of the proposed development. No birds were marked or tagged in any way, thus there are no data to assess site utilisation.*
- 4.3 *Most critically, there are no data on shorebird flux among sites – the poor survey design and lack of simultaneous surveys meant that the flux of shorebirds among sites could not be assessed. Thus the number and species diversity of shorebirds using each site are under-estimated and the consequent impacts under-estimated. These are fatal flaws to the analyses of shorebird numbers and impacts in the DIIS.*

It is reasonable for the Commission and its expert advisers to form the view that there will be other deficiencies in the data presented in the DIIS and its appendices, on the potential environmental impact analysis, and more broadly.

In relation to proposed mitigation and offset measures that will not have taken effect before the harm has already been caused to resident and migratory shorebird populations, the Tasmanian Greens do not believe the Commission will find any long data-set evidence of successful measures undertaken in similar environmental and climatic conditions, that anywhere near adequately

³¹ DIIS, 8.2.14 Fauna Disturbance, p. 357

compensate for the lost habitat and species decline resultant from similar high impact coastal developments.

In summary, the Tasmanian Greens do not believe that any amount of attempted mitigation or ill-conceived offset proposals will compensate for the irreparable damage, to the Ralphs Bay tidal zone (and fauna it sustains) and the Derwent Estuary, that would be caused by this development.



©David Jamrozik

DIIS - 5.12 Aquatic Ecology

While the proponent has persistently described Ralphs Bay at Lauderdale as a 'degraded' environment over the past five years, this section of the DIIS does acknowledge that, *"The high diversity of species and lack of dominance of individual species at Lauderdale is an indicator of good environmental health."*³²

The Ralphs Bay Conservation Area supports a rich diversity of endemic flora and fauna, as well as a highly productive and diverse microalgal ecosystem as described in Cook et al (1998)³³ that would be sharply and irreversibly impacted by the construction and operation of the Walker Corporation proposal.

What the proponent describes as '*putrescible waste*'³⁴ is in fact key to the aquatic ecology of Ralphs Bay. The tidal flats at Lauderdale contain an extraordinarily rich diversity of life such as crabs, worms, sea snails, clams and other bivalve molluscs, protozoa, the phytoplankton which form the basis of the entire food web and bacteria that play an essential role in nutrient cycling and estuarine health.

It is this complex web of life that sustains the migratory shorebirds who annually track the East Asian-Australasian Flyway from Siberia and Alaska to Australia, as far as SE Tasmania, and the resident shorebirds including the iconic Pied Oystercatcher, for whom the Ralphs Bay area is the second most significant habitat nation-wide.³⁵

In determining to excavate and permanently alter the aquatic ecology of Ralphs Bay, Walker Corporation wants the Commission and the Tasmanian people to believe it can effectively mitigate or offset the negative impacts of such profound ecosystem damage. The available science (Birds Tasmania, Cook et al (2008), Appleyard (2009), Howarth and Marino (2009)) and impartial, rational analysis indicate that this is a fallacious argument, which has been perpetuated throughout the DIIS.

The significant risk to a the critically endangered Spotted Handfish is acknowledged in the DIIS, but again, the proponent downplays the risk, expecting readers of the DIIS to believe no disturbed sediments will reach Handfish habitat inside Ralphs Bay although the proponent admits the bunding would not prevent the release of all sediments³⁶, and that there will be no adverse impacts on the species as a result of living adjacent to a 146.5 hectare canal estate and marina, with all its associated runoff pollution, dredging and boat traffic.³⁷

It simply defies belief.

Spotted Handfish in general and juvenile Handfish in particular, are acutely threatened by any degradation of benthic habitats, specifically:

³² DIIS, .5.12.1 Existing Conditions, Table 60 Key Marine and Estuarine Ecology Characteristics, p.277

³³ Cook et al, *"Impact of canal development on intertidal microalgal productivity: Comparative Assessment of Patterson Lakes and Ralphs Bay, South East Tasmania"*, Journal of Coastal Conservation, 4 September 2008

³⁴ DIIS Executive Summary, p. XV

³⁵ Birds Tasmania, *'Bird Issues: Walker Corp. marina/canal proposal for Lauderdale*, March 2008

³⁶ DIIS,

³⁷ DIIS, Table 61, 'Potential Impacts of the Lauderdale Quay Development on Wader Species on Marine and Estuarine Ecology in the Absence of Mitigation Measure', p. 283

- Siltation;
- Resuspension of sediments;
- Heavy metal pollution;
- Other forms of pollution including urban runoff;
- Increased populations of the Northern Pacific seastar, *Asterias amurensis*, which predate on stalked ascidians, thus destroying critical breeding habitat, and may predate directly upon the handfish;
- Physical disturbance of benthic habitats by high-level boating activity or dredging.

The Tasmanian Greens submit that the DIIS inspires no confidence that the proposed excavation, construction and planned development inside the Ralphs Bay tidal flats, presents an acceptable risk mitigation strategy to protect the critically endangered Spotted Handfish, or any other threatened species or vegetation community, from the threats associated with this proposal.

The Precautionary Principle must apply.



DIIS - 7 Economic Impacts

The DIIS evaluation of projected economic impacts of the proposed development is deficient in that it fails to adequately value the ecosystem services provided by the Ralphs Bay tidal zone or its contribution to the health of the Derwent Estuary and its associated waters.

While the UN commission paper by Costanza *et al* (1997) placed an acknowledged conservative dollar value on estuarine ecosystem services of \$US 34,000 per hectare per annum, the science and methodology of coastal ecosystem service valuation has since progressed.

In 2005, Blackwell and the Australian Coastal Co-operative Research Centre (CRC) placed a derived dollar value on functioning estuarine environments of \$AUS 4 million per square km per annum³⁸. Applying this contemporary environmental accounting standard to the Walker Corporation proposal produces a significant economic loss generated by the excavation, construction and ongoing operation of the 146.5 hectare project.

The implications of the loss of these ecosystem services at Ralphs Bay for the principle of Intergenerational Equity are profound and enduring.

The evaluation of ecosystem services (or eco-services) crunches the triple bottom line in recognition of the fact that " ... *the economy is a wholly owned subsidiary of the environment.*"³⁹

Daily *et al* provided the first well-known definition of ecosystem goods and services:

*"Ecosystem services are the conditions and processes which natural ecosystems, and the species that make them up, sustain and fulfill human life. They maintain the biodiversity and the production of ecosystem goods, such as seafood, forage, timber, biomass fuels, natural fibre, and many pharmaceuticals, industrial products, and their precursors. The harvest and trade of these goods represent an important and familiar part of the human economy. In addition to the production of goods, ecosystem services are the actual life-support functions, such as cleansing, recycling, and renewal, and they confer many intangible aesthetic and cultural benefits as well."*⁴⁰

For Ralphs Bay, these ecosystem services play a complex and vital role in moderating water quality, through the nitrogen cycle and nutrient cycling which in turn protects human health and the viability of nearby fisheries and aquaculture industries; its intricate food chain and protected habitats enhance biodiversity; its sandflats and saltmarsh vegetation provide protection for Lauderdale from storm surges; the bay stores decades of heavy metal pollution from upriver safely in its sediments; and its resident and migratory shorebirds, lovely vistas and changing moods instill a sense of wellbeing (good for our health) in residents and visitors alike.

Nowhere in the DIIS or its appendices is the complexity and irreplaceable value of the Ralphs Bay tidal flat ecosystem adequately acknowledged. This fundamental deficiency exposes the weakness in the proponent's argument of net economic and social benefit.

³⁸ Blackwell, Boyd Dirk, *The Economic Value of Australia's Natural Coastal Assets: Some Preliminary Findings*, Table 35, p. 146

³⁹ Nelson, Gaylord, 2002, *Beyond Earth Day: Fulfilling the Promise*, Madison, WI: University of Wisconsin Press

⁴⁰ Daily, Gretchen. 1997. *Nature's Services: Societal Dependence on Natural Ecosystems*. Washington, DC: Island Press.

<http://www.ecology.org/biod/value/EcosystemServices.html>

<http://www.ecologyandsociety.org/vol3/iss2/art14/#TheEcosystemServicesFramework>

DIIS - 8 Social and Community Impacts

Dr. Pete Hay

"Ladies and Gentlemen, I wonder how many of you have looked at the Lauderdale Quay project's Socio-Economic Impact Assessment? You should. It is a positive blitzkrieg of words, a wall of data and factual statistics right down to the last word in Appendix C.

It is designed to convey the impression that the rights and wrongs of the proposal are to be found in some convoluted calculus of the positives and negatives that lodge within its avalanche of facts and figures and projections. Now, I do not believe that to be where the rights and wrongs of this matter are actually to be found. There are, rather, two overriding principles that establish why this project should not proceed. One of these consists of the absolute need to hold the line, now, on the privatisation of public space, particularly on the coast...

opinion:

...and the other has to do with the assault that this proposal constitutes on the home range attachments to the place and community of Lauderdale. I'm going to deal with each of these in turn.

Residents of the South Arm peninsula community share a strong and abiding sense of place which the proponent portrays as an emotional response not relevant to the assessment of the development's net social benefit.

Hundreds of Tasmanians, from across the social spectrum attended the most recent Save Ralphs Bay Rally at the City Hall on 17 March this year, five years to the day after local residents and members of the wider community, first packed into the public meeting at Lauderdale Hall, which led to the establishment of SRB Inc. At the 2009 event, eminent author and academic, Dr Pete Hay, told the audience⁴¹

The people of Lauderdale have a just cause because when you fight in defence of the integrity of your place your home you are fighting in defence of your very selves. A place is not some mere abstract backdrop within which random lives are lived. When you are truly at home when an affectionate bond ties you to a home range the very fabric of the place enters you. And you enter and inform the place. It becomes a very real and tangible extension of yourself. It is the first and prime component of your very identity. And just as

2

⁴¹ Full transcript available at www.saveralphsbay.org

you have not only a right but a responsibility to defend your corporeal body, so do you have not only a right but a responsibility to defend the extended self that is your home.

What the people of Lauderdale are engaged in, then, is not just a fight for something they merely happen to like. What they are engaged in is an act of self defence: self defence against a violence that would be visited upon them by a disembodied abstraction called capital, and by capital that is not even Tasmanian, but that comes from afar and has no concept of the depth of the ties to place that prevail here.

I want to take this just a little further. If to set in defense of your affectionately-regarded home range is an act of self defence, it follows that an attachment to place – to come from somewhere – is a first-order human need, without which your very humanity is diminished. "A deep relationship to place", a wise man once wrote, "is as necessary as close relationships with people. Without such relationships human existence is bereft of much of its significance".

This is why the citizens of Lauderdale have mobilised to defend their place against an externally-imposed "making over" in the name of development. "Home" place is not to be trifled with – it supplies the very messages and symbols that construct personal and communal identity.

The Tasmanian Greens expect the Commission to place more appropriate weight than does the proponent on the local community's sense of place, and the wider community's sense of ownership and responsibility towards Tasmania's coastal assets.

The Commission's social impact assessment of this proposal must also pay due consideration to the projected loss of visual amenity caused by the theft of a treasured view across Ralphs Bay and Droughty Point to the mountain.

This terrible, irrevocable loss, would definitely not be ameliorated by " ... provision of the public foreshore and associated landscaping ... provisions for additional visual animation of the waterway that runs alongside South Arm Road, to replace the lost view of Mt Wellington, retaining view to the summit of Mt Wellington and retaining the escarpment at the northern side of the development as landscape features."⁴²

The DIIS Social Impacts section makes no mention of the potential wellbeing impact on residents, or children attending Lauderdale Primary School directly adjacent to the proposed construction zone.

The Commission must place an emphasis on these key considerations in undertaking its assessment of the social implications of this development proceeding.

⁴² DIIS, 8.2.13 Visual Amenity, p. 358 - 9

DIIS - 8.4 Health Impact Assessment

As the Tasmanian Greens' Health and Youth Spokesperson, I am particularly alarmed by the potential public health risks associated with this massive project, alongside a populated suburb and large primary school.⁴³

In this section, and elsewhere in the DIIS, the proponent fails to specifically account for the full extent of the potential, significant negative health and wellbeing impact on Lauderdale school children of being educated in their formative years alongside a hazardous, noisy, dusty and ugly construction site that, before their young eyes, results in the deaths of native species.

The Tasmanian Greens believe the likely harmful physical and psychological effects of the Walker Corporation proposal on young Tasmanians, now and into the future, must be a primary concern of the Commission in undertaking its social impact assessment of this proposal.

The DIIS identifies a range of human health hazards associated with the development that carry high levels of risk, including air emissions, soil contamination, boating collision or tragedy, pedestrian/vehicle collision and stormwater contamination.⁴⁴

Health hazards of a risk level deemed in the DIIS as 'medium' include: sleep disturbance, spill of waste materials, uncontrolled release of sewerage into Ralphs Bay, storm surge and climate change impacts on residents and users of the proposed development, mosquito and biting midge related diseases.⁴⁵ Pesticide use is proposed as one possible control measure for mosquitos during construction.

The Tasmanian Greens do not believe the collective or cumulative potential human health impacts can be effectively mitigated, despite the proponent's assurances. We believe the human health risk potential is too high.

⁴³ Shearman, D., 'Childrens' Health and Environmental Indicators', Doctors for the Environment Australia, Feb 2006, <http://www.dea.org.au/node/122>

⁴⁴ DIIS, Table 92, Hazard Identification and Risk Management During Construction, p.372-3

⁴⁵ Ibid, and Table 93, Hazard Identification and Risk Management During Operation, p. 373-4

Conclusion

A Manifest Triple Bottom Line Failure

The Tasmanian Greens submit that the Walker Corporation Draft Integrated Impact Statement fails the critical triple bottom line test. It seeks to divorce economic benefit from social and environmental cost, presenting a dubious argument of net benefit.⁴⁶

If the tidal flat environment at Ralphs Bay is damaged to the extent the Walker Corporation proposes, the economic and social costs would be significantly higher than set out in the DIIS. This is the experience of Local and State governments and planning bodies interstate. The Statement of Commitments from the Walker Corporation must be viewed in that context.⁴⁷

There are numerous failings, flawed assumptions, fallacious arguments, omissions and a callous disregard for the conservation values of Ralphs Bay contained in the DIIS.

The DIIS exposes the proponent's:

- Failure to sufficiently detail the environmental values of the Ralphs Bay tidal zone or its rightful status as a Conservation Area;
- Flawed assumption that it can succeed in preventing the severe environmental degradation and high economic costs that led to the ban on construction of canal housing estates in NSW and Victoria;
- Flawed assumption that the Precautionary Principle, biodiversity conservation, habitat protection, and estuarine ecosystem services should not be the key considerations in this assessment;
- Flawed assumption that a mid-range sea level rise projection of 0.5M by 2100 is an appropriate response to future climate change risk to coastal communities;
- Fallacious argument that proposed mitigation and offset measures are adequate to compensate for the devastating impact on resident and migratory shorebirds⁴⁸; and callous disregard for their sustained wellbeing, as well as for the ecological significance of Ralphs Bay at Lauderdale;
- Omission of factual evidence relating to real costs across the triple bottom line, to support claims of Net Benefit, despite the heavy environmental costs which are insufficiently weighted in comparison to projected economic and social benefits.⁴⁹

The Tasmanian Greens call on the Resource Planning and Development Commission to reject the Walker Corporation proposal on environmental, social and economic grounds as the proponent has manifestly failed to present a moral argument for destroying a critical estuarine ecosystem or to demonstrate the need for its development.

⁴⁶ DIIS, 10 Net Benefit and Impact of Project not Proceeding, p. 398 - 401

⁴⁷ Ibid, 11 Statement of Commitments, p. 403

⁴⁸ Woehler, Dr E., Submission to the RPDC, Birds Tasmania, 6 April 2009, p.3

⁴⁹ DIIS, ES3, *Qualitative Assessment Summary and Net Position Across Economic, Social and Environmental Benefit and Cost Aspects*, p. XXIV

The Walker Corporation has failed to establish a contemporary economic basis for determining the true environmental costs and benefits associated with its proposal, and it has failed to give adequate weight or meaning to the South Arm peninsula community's existing strength and values, including its passionate sense of place.

Cassy O'Connor MP

Member for Denison

Spokesperson on Environment and Coastal Policy

Ralphs Bay, Tasmania.