



City of Greater Geraldton Submission Mid West Ports – Draft Port Master Plan

INTRODUCTION

The City of Greater Geraldton ('the City') welcomes the release of the draft Port Master Plan (PMP) and takes this opportunity of thanking the Mid West Ports Authority (MWPA) for extending the submission deadline to enable the City to more fully consider the PMP and its implications on the Geraldton community.

This submission reflects the main issues and concerns raised by the City in its capacity to represent the entire local community.

The City recognises the important role of the Port to the economy of the City and the Mid West region which is reflected in many strategic City publications such as the Community Strategic Plan, Local Planning Strategy and Scheme.

Whilst the City is generally supportive of the PMP and its desire to maximise opportunities for the existing Port area it is not supportive of the notion of long term Port expansion and associated corridors thereto, as further detailed below.

COMMENTS

1. Coastal Issues

The PMP advocates a sustainability focus throughout the document including the 'Sustainability Focus' of the Introduction which states that *MWPA recognises the forecasted impacts of climate change and projected sea level rise will require careful management and planning. Ensuring climate change resilience* is also an outcome of the engagement phase as indicated on Figure 7. Whilst the City welcomes this 'sustainability focus' it is disappointed that the PMP has failed to take into account the significant coastal ramifications of the PMP.

State Planning Policy 2.6 – Coastal Planning Policy requires that coastal hazard risk management and adaptation is appropriately planned for by the responsible management authority. The onus is on any proponent to show that development does not pose any likelihood of serious or irreversible harm to the environment.

MWPA were kept informed throughout the City's CHRMAP process, and indicated that they would undertake their own specific CHRMAP process for the Port. There is no evidence of this, and how over the timeframe of the PMP they are going to adapt to the coastal hazards of inundation and erosion.

The (potential) construction of various breakwaters will increase the volume of sand prevented from naturally feeding all of the City's northern beaches and further impact the nearshore wave setup. It is likely that sand that does bypass these breakwaters will be pushed offshore rather than inshore and direct waves to the City's beaches and foreshores. Any construction works will need to demonstrate that there will be no impacts on City's assets (including altered inundation risks to the localities of West End, Beachlands and Geraldton).

2. PMP Vision

The vision purported by the PMP describes what a port **could** look like, not what it **will** look like. This vision appears to be inconsistent with many other statements and directions given throughout the PMP including:

- From the Chair (pg4) – *'The development of the PMP is another important milestone which will provide investment confidence'.*
- Introduction (pg10) – *Inform port users, employees and the broader community how they can expect to see the port develop over the coming years'.*
- PMP Strategy (pg32) – *'The overarching PMP Strategy is intended to provide high-level guidance as to how the port can develop over time.*
- Implementation and Review Process (pg56) – *'... the PMP will be used to inform investment decisions and consideration of proponent proposals.'*

Recommendation:

- i. Alter either the PMP vision or the document so that they are not contradictory.

3. Detailed Technical Reports

The Executive Summary refers to *detailed technical reports* that were undertaken to underpin the PMP. The City is not aware of being provided these reports. It is common practice that any 'background' type information/studies form part of the document (such as part 2 of the City's Local Planning Strategy).

Recommendation:

- ii. Include the detailed technical reports as either a separate part or appendices to the PMP.

4. ONIC

Section 3 (pg14) refers to the ONIC not being committed. It is contested that the ONIC has indeed been committed as is evidenced in numerous spatial land use planning publications including the City's Local Planning Strategy and the WAPC's Greater Geraldton Structure Plan 2011. Detailed alignment studies have also been progressed by the State.

Recommendation:

- iii. Reword the last dot point on pg14 to reflect that the constraint is more that the alignment of the ONIC has not been formally secured or funding committed.



5. Trade Forecast Scenarios

The design scenario used for the PMP is the 'high growth' scenario yet this scenario cannot be accommodated without significant expansion of the port. The PMP seeks to *avoid a situation where economic opportunities are lost due to a lack of foresight* yet this is exactly what will occur for the Oakajee project (i.e. significant expansion of the port will result in opportunities lost for Oakajee).

The existing infrastructure of the port could cater for the majority of the 'moderate' growth scenario, which the City fully supports.

Recommendation:

- iv. That the 'moderate growth' trade forecast scenario be used as the design scenario for the PMP.

6. Infrastructure Needs – Road Infrastructure

The PMP states that capacity modelling indicated that the *average traffic volumes are predicted to increase to 39 vehicles per hour, compared to current average of 8 vehicles per hour*. The predicted traffic increase appears to be limited to port haulage vehicles only.

Consideration must also be given to increased population, increased tourism and associated increase in the general public use of the road network including pedestrians and cyclists. The PMP also suggests that intersection modelling has been carried out indicating that the *existing road network have sufficient capacity to accommodate these increases and maintain an acceptable Level of Service*. This may be so but the scope of the intersection modelling is unclear in regards to the appropriate inclusion of projected general public traffic use. Consequently, the respective intersection modelling may produce a different Level of Service (LOS) to what has been suggested. It must also be noted that intersection modelling does not (generally) take into account other road users such as pedestrians and cyclists.

A Safety in Design (SiD) and Road Safety Audit (RSA) exercise would be required to identify the risks associated with the increased mix use of the road network by heavy vehicles and the general public. The suggested alternate heavy haulage route could offer improved road use safety.

There is little information in the PMP in regards to the road pavement structural capacity. Investigations should be carried out to determine the impact the added load will have on the structural integrity of the road pavement and associated road pavement asset life.

7. PMP Strategy – Protection and Growth of Transport Infrastructure Corridors

The terminology of 'Southern Transport Corridor' is now somewhat outdated. The STC alignment has been identified in the City's Local Planning Strategy as an 'Infrastructure Corridor' and been reserved in the Scheme as a 'Special Purpose – Infrastructure Corridor'.

Recommendation:

- v. That the 'Southern Transport Corridor' reference be removed from the document and replaced with the Geraldton-Narngulu Infrastructure Corridor.



8. PMP Strategy – Creation of an Intermodal Inland Port at Narngulu

Whilst the City generally supports the notion of utilising the Narngulu Industrial Area (NIA) for port related uses it is concerned with referring to an 'Inland Port'. This terminology infers that 'port' related uses will become the focus for the NIA, which is not the case. In preparing the City's new Scheme it was recognised that the Webberton industrial area will transition into more light and service industrial uses whilst the larger more general type industries will be encouraged to the NIA.

The City is concerned that any significant acquisition of land in the NIA simply for potential future use could sterilise land holdings for many years and simply be a 'land banking' exercise. The City has found that this is the current situation with DevelopmentWA (formerly Landcorp) who seem to discourage development on their landholdings.

It should also be noted that the City actively discourages open storage/stockpiling in the NIA (especially of iron ore) and will continue this stance. An 'Inland Port' seems to infer that these types of uses would be appropriate.

Recommendation:

- vi. That the term 'Inland Port' be deleted throughout the document.

9. Port Maximisation Projects 0-5 Years – Item 2 (Protect and where relevant expand the Southern Transport Corridor)

The alignment of the Geraldton Narngulu Infrastructure Corridor as shown on Figure 12 appears to be to the south of the actual current alignment.

There appears to be very limited opportunities to expand the infrastructure corridor without land acquisitions. If additional land is required the MWPA should have in place suitable mechanisms to enable early land acquisition. The City will not stop orderly and proper planning adjacent to the corridor on the idea that MWPA 'might' need some additional land sometime into the future.

Recommendation:

- vii. The alignment of the GNIC be correctly depicted in the PMP.
- viii. That should land be identified for the corridor expansion then it be acquired immediately and amendments made to the Local Planning Scheme accordingly.

10. Port Maximisation Projects 0-5 Years – Item 3 (Develop common user access and materials handling corridor)

Whilst the notion of the corridor is supported the PMP is noticeable in the lack of detail on this matter. Specifically, Figure 12 indicates some form of unloading area (shown as a white rectangle) at the southern extent of the material handling (red line) and also a conveyor trestle structure across Marine Terrace is a design option.

Given the proximity of the proposed rail unloader to both Point Moore and the adjacent coastal areas, the City has concerns regarding dust and noise emissions during unloading operations (especially as dust residue is clearly seen in the vicinity of the existing unloaders and approach areas which are covered in a black substance). Additionally there would

undoubtedly be structures including unloading buildings/conveyors etc. and the City has concerns at the possible visual impacts of this infrastructure.

As this is identified as a 0-5 year project it is assumed some further detailed analysis has been undertaken by MWPA.

Recommendation:

- ix. That further details be included in the PMP on the common user access and materials handling corridor (including any impacts on the Marine Terrace level crossing with trains unloading) and that further clarification be provided on access (both road and rail) as the road realignment is not shown until the 5-10 year timeframe.
- x. Given the rail unloader is in the 0-5 year timeframe, that the MWPA provide further details to the City on the rail unloading facility and associated structures with specific reference to visual impacts, noise and dust emissions in the proposed location and approaches thereto.

11. Port Maximisation Projects 0-5 Years – Item 23 (Develop Marine Terrace traffic controls)

Any potential projects that have an effect on Marine Terrace could potentially introduce traffic safety risks to the general public. A Safety in Design (SiD) and Road Safety (RSA) would be critical to identify and mitigate potential risks. The City would need to be involved in the development of the SiD and RSA. Consultation with Main Roads would also be required.

12. Port Maximisation Projects 0-5 Years – Item 30 (Consideration of sea lion habitat)

The Australian sea lion is listed as ‘vulnerable’ under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 and also listed as a threatened species in Western Australia. To simply state that ‘consideration’ be given to the sea lion population and also to presume that the colony’s habitat can simply be ‘re-established at a nearby location’ does not indicate any true value has been placed on the significance of the population.

Given the vulnerable and threatened status of the sea lion, and the fact that it has been identified as a 0-5 year project, once again surely some further detailed analysis has been undertaken by MWPA.

Recommendation:

- xi. That item 30 be reworded accordingly to reflect the vulnerable and threatened status of the sea lion. That further details be included in the PMP on the sea lion habitat (especially the feasibility of ‘relocation’).

13. Port Maximisation Projects 5-10 Years – Item 10 (Reclaim land for FBH development and coastal protection)

The PMP is proposing to reclaim the section of beach that is used to provide sand for the northern beaches stabilisation program and there is no mention made of how this will affect the program nor how MWPA is going to sustain the program.

Recommendation:

- xii. That the PMP reflect that any reclaiming of land be contingent on finding a suitable replacement sand source for the northern beaches stabilisation program.



14. Port Maximisation Projects 5-10 Years – Item 11 (Closure of Marine Terrace (Point Moore) level crossing) and Item 12 (Coastal road link – Separation Point Close to Marine Terrace)

Point Moore and the surrounding area currently offers exciting opportunities for recreational and tourism development. Any projects that may create a barrier that isolates these areas, reduce accessibility or makes it difficult and unappealing to access and visit is not supported by the City. A new coastal road would further reduce the City's foreshore reserve(s). Given that the road would be constructed within the coastal hazard area identified in the City's CHRMAP process the road asset would need coastal protection immediately.

It is not clearly identified who would be responsible for the ongoing maintenance of the coastal protection structure. There would be a major loss of beach and recreational opportunities which would significantly impact on the tourism viability of the caravan park.

The City also has a legal agreement with Mount Gibson Pipelines (via Asia Iron) for a slurry pipeline through this area.

The coastal path through this area is also an important recreational asset that is a key link in the City's pathway network and this needs to be recognised.

Whilst supporting the proposed additional connectivity, the City is concerned with the environmental impact, possible loss of coastal amenity and potential impact/loss of a site important to the Aboriginal community.

Recommendation:

- xiii. That the PMP indicate how it will offset any loss to recreational/tourism amenity and identify ongoing maintenance responsibilities for any protection works.
- xiv. That MWPA provide further details to the City on how the issues of environmental impact, coastal amenity and the Aboriginal site will be addressed.

15. Port Maximisation Projects 10-15 Years – Item 3 (Development of Fitzgerald Street flyover)

The flyover proposal will have significant impacts on the Beachlands/Mahomets Flats localities. It is likely to disconnect the general public from Point Moore and the recreational/tourism potential of the area. Furthermore, traffic through Beachlands is likely to increase significantly and potentially alter driver behaviour to other further afield destinations such as TAFE, the hospital, education establishments and the Geraldton CBD itself.

Recommendation:

- xv. The flyover should be deleted from the PMP until such time as full impact analysis has been undertaken.

16. Port Maximisation Projects 10-15 Years – Item 4 (Investigate options for coastal protection and preservation of recreation areas)

As previously stated (see comment 1.) the MWPA has not undertaken any detailed CHRMAP for the PMP. Until such time as the full ramifications of any proposed projects that affect the

coastal zone are known the City cannot support any aspect of the PMP that implies future coastal protection works.

Recommendation:

xvi. Item 4 be removed until such time as a detailed CHRMAP has been undertaken.

17. Section 8 Long Term Port Expansion

From the outset the City does not support Option 1 – expanding the existing Port but rather is fully supportive of Option 2 – develop a new port at Oakajee.

Whilst the PMP states that it does not recommend a preferred location it is considered that the PMP has been written in a manner that favours Option 1. This is evidenced by the fact that in the ‘Introduction’ the PMP states that *a subsequent Port Development Strategy is in progress which will further examine the relationship between Geraldton and Oakajee*. It would be prudent to allow this Strategy to be completed prior to finalising the PMP.

Additionally the PMP in the ‘Timing’ section *states the transition from a maximised Port to an expanded Port requires a considerable planning and consultative process. It follows that initial planning for the selected expansion option would need to commence within the next five years, in order to meet expansion requirements by the end of the 15 year horizon.*

It is highly unlikely that a decision on Oakajee will be made in the next 5 years given the history of the site, and therefore the PMP has resigned itself to only pursuing the option of initial planning for the expansion of the existing Port.

Recommendation:

xvii. That Section 8 be deleted from the PMP until such time as the Port Development Strategy is complete.