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The Coordinator-General
c/- EIS Project manager – Great Keppel Island Resort Project
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Re: The environmental impact statement (EIS)—Great Keppel Island Resort Project

On behalf of North Queensland Conservation Council (NQCC), I write to oppose the Great Keppel Island Resort Project (GKIRP) proposed by Tower Holdings (Tower).

I comment first on the claims made by Tower on their website (<http://www.gkiresort.com.au/home.html>) and reiterated in their EIS in the light of very similar claims made for a very similar development at Nelly Bay on Magnetic Island (also in the Great Barrier Reef World Heritage Area).

Claim 1: Unrivalled community lifestyle benefits

On Magnetic Island, the 'flow-through' of benefits from the vast development at Nelly Bay amounts to one restaurant open to the public, one massage 'spa', another coffee shop and another supermarket (mooted to be closing). In exchange, the community has lost its iconic 'unspoiled' reputation. The Nelly Bay development remains unfinished, with the gateway to the island (previously a much-photographed heritage wooden jetty, with no visible buildings) now consisting of unappealing high rise concrete and glass units, a steel and concrete ramp for travellers, a large, unshaded carpark, a large rusty-reo and stagnant water filled hole in the ground (the result of unfinished tavern and shops development), a large area surrounded by advertising hoarding hiding three other large holes in the ground – the result of the developer's economic decision not to complete the construction of units.

A further direct loss to the community has been the loss of much of Nelly Bay beach. This is a proven direct result of the impact of the marina and harbour breakwater. Despite claims by the developer that there would be no need for maintenance dredging, sand removal and transfer (in trucks) to Nelly Bay beach is a twice-yearly inconvenience and expense borne by tax-payers and/or ratepayers.

Further more, and as is the proposal for GKIRP, the Nelly Bay development involved modification to an important creek. This has resulted in the need for continual dredging of the creek and the modification and loss of riparian vegetation.

Similar outcomes and problems could be expected with the GKIRP.

Interestingly, few if any of the original supporters of the development at Nelly Bay remain supporters. See:

Harbour supporters hate the result

<http://www.magnetictimes.com.au/index.php?p=1&ID=2152>

In response to: Harbour supporters hate the result
<http://www.magnetictimes.com.au/index.php?p=6&ID=2153>

Claim 2: Improves access to the island

In addition to the unappealing appearance of the access point, the Nelly Bay terminal is now at a greater distance from the mainland, leading to longer and more expensive journeys. The access closes more frequently in inclement weather than did the previous jetty and safety (the original 'reason' for the development) has not improved.

The GKIRP claims for improved access need to be fully justified; a new access is not necessarily better, and access that damages the environment is not an improvement.

Claim 3. Economic diversity for the region

The development has been an economic disaster. One of the major constructions (units) was recently placed in administration; the other – resort units run by Peppers – is in receivership, with a fire sale of never-sold strata-titled units currently occurring. Visitorship to the island has fallen, as the traditional market (families) is put off by the development.

The economic information provided in the EIS needs to be thoroughly assessed by experts. It is easy to make claims based on simplistic input-output tables and spurious 'multipliers'. (Input-output simply shows that what you put in you get out; multipliers exist for all economic activity, so are irrelevant for any one sector.) The economic reality of developments can often be very different – with devastating impacts on the community.

Claim 4: Creation of 1,400 new jobs

At no stage was the number of new construction jobs claimed for Nelly Bay reached and very few jobs went to locals. With the failure of the development to attract buyers and/or tourists, subsequent jobs have failed to materialise. Employment claims made by Tower need to be checked.

Claim 5: Increased tourism visitation and spend

With the development detracting from the attractiveness of the island for its traditional market, jobs across the island have fallen, with businesses (including the butcher, the baker, the fish-and-chip shop, the op-shop) all closing, and accommodation houses being severely affected.

The increased cost of transport to the island has further discouraged local visitation.

Similar problems could well be the future for GKIRP.

Claim 6: Will be a leader in environmental sustainable tourism

Claims made for Nelly Bay also suggested that it would be a leader in 'environmental sustainable tourism'. This is an easy claim to make – indeed, is one made by seemingly all developers as a matter of course – but the reality is massive use of concrete and air-conditioning, siting of buildings focused on views rather than climate realities, negative impacts on seagrass, coral and water quality, excessive water use for inappropriate landscaping (or golf courses) and interference with natural local ecosystems. There is no reason why such would not also be the case with GKIRP.

In addition, the EIS prepared on behalf of Tower is deemed inadequate in that it:

Relies overly heavily on desk-top studies;

Deals inadequately with the issue of sedimentation, of erosion caused by changed coastal dimensions, and of water quality.

Deals inadequately with the impacts of the proposed development on MNES (notably the Outstanding Universal Values of the GBRWHA, and listed species, including the Olive Head snake).

The proposal for a major coastal development within the GBRWHA is in contravention of the views and decisions of the World Heritage Committee as expressed at its June meeting in St Petersburg.

Approval for such inappropriate and damaging development within the GBRWHA runs the risk of UNESCO declaring the GBRWHA (a major drawcard for Tower) 'in danger'.

Lessons need to be learned from other such development within the GBRWHA, such as Nelly Bay.

I urge you not to approve this development proposal but to seek a greatly scaled-down tourism attraction in keeping with the location and with the World Heritage values of the region.

A handwritten signature in grey ink, appearing to read 'Wendy Tubman', written in a cursive style.

Wendy Tubman
Coordinator

5 September 2012