

29 January 2019

**Attention:** Richard Hook – Works Approval  
Environment Protection Authority Victoria  
works.approvals@epa.vic.gov.au

**RE:** Yumbah Aquaculture  
Application number (1003316)

[REDACTED]

Please find my objection to Yumbah's Response to Stakeholder Submissions on EPA and Environmental matters.

This has been a huge matter to deal with over the past 2 years since rumours began about this proposal. Large amounts of information to deal with and consuming our lives but I believe that I must try to save what is ours and our neighbours in this beautiful part of Bolwarra in the Glenelg Shire.

I put the trust in the EPA to determine the accuracy of their assessments and can only hope that you will prevent this Abalone Farm setting up and ruining this tranquil area and fertile land from being destroyed and not disrupt the lives of so many landholders that this is the place we call home.

**Managing Amenity within the Rural Living Zone**

Amenity expectations from residents are high and it is reasonable are made by proponents to respond to reasonable concerns of amenity as they relate to potential offsite amenity impacts (for example noise, odour, traffic, visual etc)

**What GHD have failed to mention is that "The RLZ zoning provides for agricultural activities however emphasis is given to the protection of residential amenity" Residents have of Dutton Way have purchased their homes believing that they had protection from any inappropriate development in close vicinity of their homes. This one fact should be enough to stop this proposed site being approved.**

**Air Quality – Dust**

Yumbah state "there is no tis of Impact to the air quality with dust during operation.

**Could you ask them how they plan to achieve a dust free zone outside of the construction zone?**

**Prior to approval can you advise, how CEMP without any detail how can they assure this is even possible?**

**How can this be approved without the knowledge and understanding of problems and solution before this is to be approved?**

**We believe all residents should considered as stake holders also. It is our lives and lifestyles that are the ones being most affected and impacted. As stakeholders we deserve this information prior to approval.**

**It is even stated they "they will put up wind fences" how is this going to help...wind blow in every direction a fence will not make much of a difference!**

Yumbah's Risk assessment states that to control the dust they will:-

**RESTRICT VEHICLE MOVEMENT TO DEFINED ROADS...WHICH ONE THERE ISN'T ANY OTHER!  
It will be mammoth earthworks, equipment, scrapers and huge amounts of earth being removed and a scared area.**

**How can this mega construction of size emit a low level of dust?**

**How will it be monitored as this a site like this hasn't been done before.**

**IT'S OUR HEALTH THAT WILL BE AFFECTED. THE SITE WOULD NEED TO BE IN A BUBBLE so how is this going to not affect the RESIDENTS??**

**WHS regs, 50 state air monitoring by an occupational hygienist must take place during these operation.....will this be happening??**

### Traffic

Truck access will be restricted to Dutton Way and on average, the development would generate approximately two truck movements per day. It is anticipated that trucks will travel to and from the site from the east (Geelong/Melbourne) via Princes Highway. Keilors Beach Road and Dutton Way.

**What about the cement deliveries. How many cement truck deliveries will be required to lay 50 odd acres of ponds?**

### Visual Impact / Size

Visual impact can also be influenced by whether the viewer is stationary (i.e. as in a dwelling) or moving (i.e. in a motor vehicle). In this regard, from the Princes Highway are confined to small sections when travelling west towards Portland and not visible when travelling east towards Warrnambool. Along Dutton Way the development will be viewed when heading west with oblique views through existing vegetation and where vegetation is required to be removed to allow access for pipe easements. However, it is considered that simply because a development can be seen does not necessarily equate to a negative visual impact.

***People spending less than 30 seconds driving along the Princes Highway will not be subjected to the sight of 50 plus acres of black shade cloth covered structures BUT it is tragic and beyond belief is that Yumbah appear to imply that their development will not be a negative visual impact to those living on Dutton Way.***

**The current site can be seen from Bay of Whales in Narrawong?????**

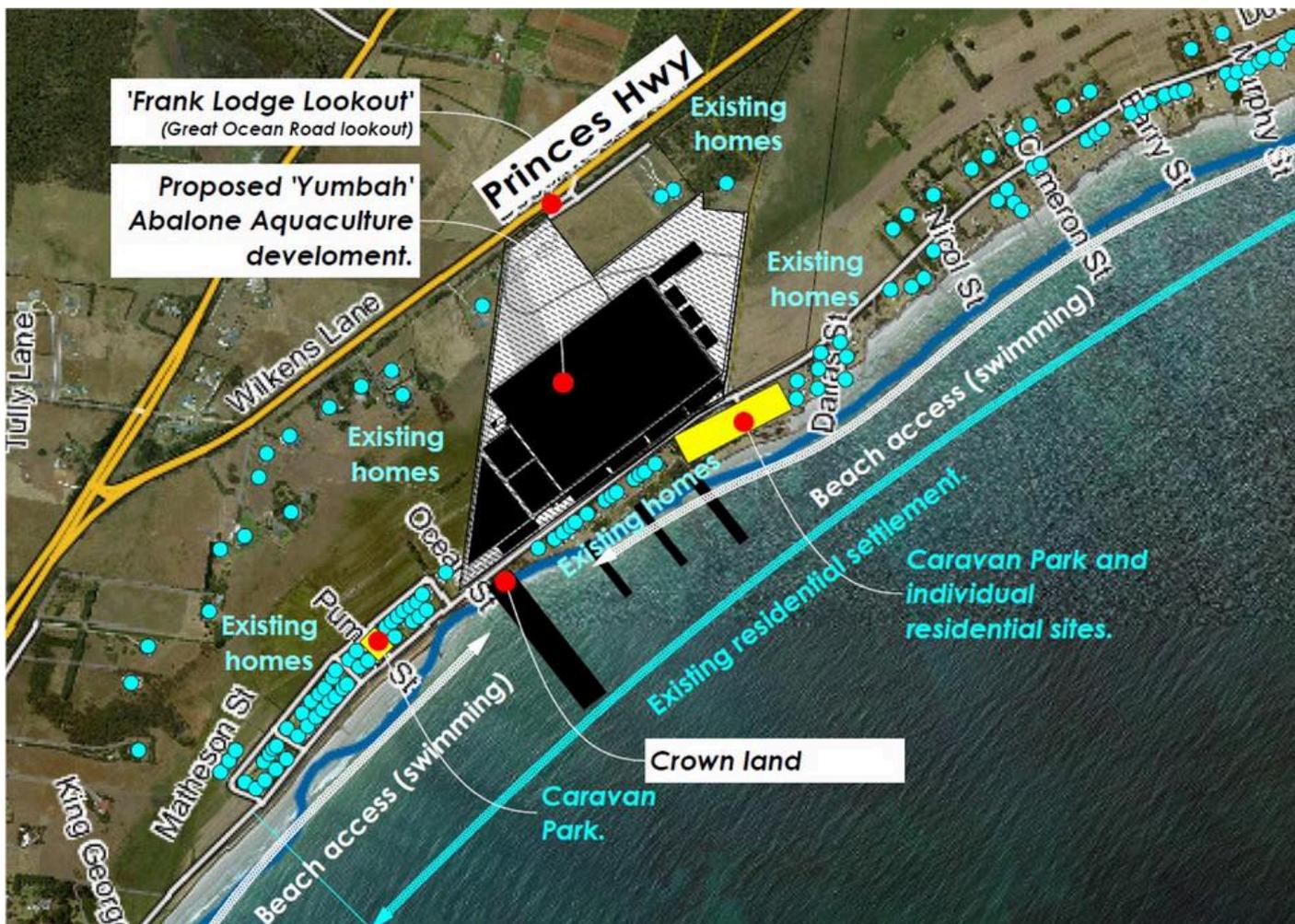
### Matters not Addressed by GDH

No planting of vegetation is going to hide the ugly structures that Yumbah propose to erect. Yumbah's current site in Narrawong is an eyesore and blight on the landscape as stated in my last submission (I also have images). I have no belief that Yumbah could or would maintain their site in a manner that they explain as they have not even made an effort to present the site in Narrawong to a pleasing presentable manner even when under scrutiny while this planning application is processed. (They feed of our information and went into a frenzy trying to clean up their act)

It is very unfortunate that GDH on behalf of Yumbah did not acknowledge the visual impact to the Dutton way Beach. I do not believe that Yumbah will be able to successfully bury the pipes as the sand levels along the beach are constantly changing due to tidal and weather conditions. We had a storm come through a couple of weeks ago and we lost 30cm's of sand overnight. The laying of the pipes at Dutton Way Beach will have an obvious negative visual impact on Dutton Way Beach. (Also shown if previous submission)

Also another topic not addressed by GHD and Yumbah, despite the heading of the topic, is the actual size of the proposed site. According to the Warrnambool Standard the proposed farm would produce 1,000 tonnes of abalone in a year, five times the size of the Narrawong operation. The proposed operation would include 20 pipes carrying about 6,000 litres of seawater per second to the land-based farm, before discharging **treated**??? water into the bay. There would be 5,800 solar panels covering an area of two hectares of land, capable of generating 2 megawatts of electricity. A project this size does not belong in the middle of a residential area and as GHD and Yumbah have not addressed the size of the proposed site it can only be presumed that they can find no argument to support the proposed placement of this enormous facility in a long established residential area.

**A reminder of the actual size in comparison to the homes that are surrounding  
The Proposed Site**



## **Impact on Tourism**

**Dutton Way is not recognised through the Planning Scheme as a tourist destination?**

**As stated in my previous submission.....we have a huge number of tourism in this area but all involved seem to dismiss this BUT we have Whales, Tourist who stay in Accommodation Properties/Caravan Parks and private homes all year round and every summer heaps of patrons swimming, riding, walking, running & some just reflect sitting on the rocks at The Dutton Way...so you all should come and take the time to visit this area you all would see how this is just the GEM of PORTLAND! It's not all about Portland, Cape Bridgewater as we have a peaceful, tranquil beach on Dutton Way that all can enjoy! Give us a chance and open your eyes to the GATEWAY TO PORTLAND!**

### **Dutton Way has tourism activities happening all year round including:**

The Henty Bay Caravan Park had over 7000 stays last year and the proposed facility is 8 metres away from where their guests pitch their tents.

In fact there are two of Portland's Caravans Parks are on Dutton Way.

Local families and visitors alike use the beach as a local swimming location as the beach is easily accessible and has a reputation as a safe option for swimming

There are numerous holiday home owners along Dutton Way

Fisherman stay in the holiday houses and airBnB's year round and are big spenders in Portland on food, beverage, entertainment and fishing supplies

Hundreds of people who flock to Dutton Way every time there is a call out on Whale Mail

**To sum up, how can the GHD report writer who is not based in the Glenelg Shire tell the Residents of Dutton Way and surrounds, who witness the influx of tourists all year round, that there is no tourism is beyond comprehension.**

### **Glare from Solar Panels**

It is considered the panels will not generate an unacceptable level of glare and glint on neighbouring vantage point.

**What is an acceptable level of glare? For someone living in the line of sight of these solar panels it is zero. For the report writer sitting in their office in Melbourne there probably is a higher tolerance.**

**What is this vantage point that GHD/Yumbah talk about? Is it a moving vantage point or a stationery one as all of examples they have given us such as the Tullamarine-Calder interchange, Brisbane Airport and a number of freeways. (As an aside Europe does not have freeways as this implies they are free to travel on. You will find that most countries have Motor Ways (i.e. Italy Auto Strade and Germany Auto Bahn and most western European countries are all local language variations on the term Motor Way) and they are tolled roads.)**

These images of the Tullamarine Calder Interchange have been copied website:

<https://www.goingsolar.com.au/case-studies/solar-noise-barrier-tullamarine-calder-interchange>.

The first image clearly shows the panel acting as a mirror which would create a glare factor and the second image shows a single row of panels that are alongside, not facing, the traffic and they are well above what is the eyesight of the drivers so the glare factor of this example is not comparable to 5800 solar panels located in such close proximity to residential homes.



The moving vantage point referred to is of course important BUT it is NOT where my concerns lay. What I am objecting and referring to is a stationary point, being a home, overlooking or in close proximity to the proposed 5800 solar panels. The fact that GHD and Yumbah have given no such examples of 5800 solar panels in a residential area, that not only has homes abutting the site but also has homes overlooking the panels, to me infers that Yumbah cannot find a comparable site that has successfully installed 5800 solar panels facing directly into residential properties .

The following images show examples of glare from an existing site and the unattractive; some including me say ugly, large installation of solar panel that GHD and Yumbah are suggesting will not affect the amenity of the residents of Dutton Way and surrounds.

When the Wexford solar farm refused planning permission one of the reason given *was that the planning authority was “not satisfied” that the proposed development would not seriously injure the amenities of the area or the property in the vicinity.*



What is the standoff distance of a Solar Panel Farm of 5,800 panels adjoining a Residential Property?

### **Effect on Property Values / Rates & Financial Guarantee**

Our Property Values will be effected in time BUT the saleability of our Properties HAVE & WILL continue to be affected and could be on the market for years, we will have to sell our properties at a loss because no one will want to purchase them with a HUGE ABALONE PLANT near them.....so WHO is going to compensate us for this loss....THE SHIRE/YUMBAH/STATE GOVERNMENT???? OR WILL THEY JUST TAKE OVER ALL OF DUTTON WAY & RUIN IT FOR THE FUTURE.....THIS IS NOT AN APPROPRIATE SITE FOR A PLANT OF THIS SIZE!

We need more HOUSING\RETIREMENT VILLAGES in Portland and this would be a perfect lifestyle for many families. A subdivision of this area would create many jobs for locals to. It also would blend better in this beautiful part of PORTLAND!

### **Noise**

Noise is a significant concern for residents that are closest to the facility. Noise criteria is not designed to achieve inaudibility. The aim is to ensure any noise, if audible, does not create nuisance within dwellings.

***Noise is a major factor for all residents of Dutton Way. We are in a valley and any sound is amplified to the nth degree. Dutton Way residents are entitled to full amenity of life including outdoor activities on their own properties without the introduction of non-natural and persistent noise.?***

***As we are an adjoining property holders and the closets residents to the pump stations we are 100% IMPACTED “Noise travels in the dead of night/wind we hear fishermen talking, walkers & cars So how is the constant and persistent droning of the pumps going to be stopped as a plant this size has not been constructed before in an area comparable to this?***

## MEDIA RELEASE - Council welcomes coastal erosion expert for cross-border forum

6 November 2017



World renowned oceanographer Dr Kerry Black has warned we must act to protect our coastline from the growing threat of climate change.

Glenelg Shire Council played host to the coastal erosion expert today as part of a forum to discuss coastal management trends and issues with representatives from across south west Victoria and south east South Australia.

The one hour session focused on global strategies to protect beaches from erosion including a detailed focus on regenerating Dutton Way and the Port of Portland.

Dr Black identified specific measures to help ensure the region's famous coastlines continued to remain world class attractions.

"At Portland, it will be necessary in the longer term to re-align the beach orientations, particularly at Dutton Way" he said.

"This can be achieved with groynes (a barrier built out at sea) or offshore reefs. The existing seawalls are not helping to realign the beach orientation and are not preventing erosion; they are just protecting the land.

"The best form of coastal protection is the beach itself and we need to ensure that a collaborative approach is taken, taking into consideration our counterparts in South Australia and coastlines past Warrnambool."

Dr Black also touched on longer term issues such as climate change and how rising sea temperatures are affecting our local shorelines.

He stressed the need for urgent and lasting change to not only protect our coastlines from devastation, but to also ensure our local economies can continue to grow and thrive, looking particularly to the long term impact on the Port of Portland's operations.

*The report written by Sustainable states that*

“The construction of the entire site will take 3-4 years to complete.

Yumbah has designed the project to be staged over four phases which will each be completed as milestones.

**I object to this statement as the project, no matter how you word it.**

*IT will still be a 4-year Construction Zone*

*in a Residential Rural area which is an unacceptable time frame for residents.*

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