

[REDACTED]  
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[REDACTED]  
12 January 2019

Re- EPA application 1003316

Yumbah Nyamat aquaculture.

To whom it may concern,

After reading Yumbahs response, we wish to again object to the Abalone "farm" proposed to be built [REDACTED]  
[REDACTED]

After reading through Yumbahs responses to the initial objections, they have not addressed all our concerns, in fact they have exasperated them with some of their arrogant responses.

Regarding the infield road proposed to be constructed from Frank Lodge public scenic lookout to their car park, we questioned the necessity to build it at all, when their factory could be easily accessed from the existing Dutton Way entrance most of which would be on the old Princes Hwy section that passed through this property and could support the anticipated light vehicle movements and alleviating much disruption and potential danger around Frank Lodge public lookout.

Yumbah have not even acknowledged let alone addressed our concerns of having 200 plus light vehicle movements daily passing [REDACTED] - (GHD response. Traffic 4;iii ). They say they are to use the existing farmers track. There is no existing farmers track between Frank lodge lookout and the top of the ridge [REDACTED] [REDACTED] and certainly not any form of track, path or stock run alongside [REDACTED] [REDACTED] as proposed to develop. Below the fenced ridgeline, including a gate, a basic track is present, starting off [REDACTED] heading East along and down the ridge. This track already shows signs of erosion as no effort to control water run off has ever been effected. Nowhere in Yumbahs initial or updated proposal do they acknowledge or indicate they would include a buffer zone or set back to suppress any noise, dust, or light pollution [REDACTED] [REDACTED] from the 200 odd vehicle movements .

Regarding road construction down and along the ridge, we were advised by the soil tester (30+ year local experience) to not build or excavate the ridge line or below due to the amount of red clay, and the potential for land slippage when we built our house [REDACTED] Yumbah acknowledge the water run off from the ridge area in their recent hydrology report but do not mention how they will deal with it in respect to the proposed road. Whether the road will be of a sealed type with curbs and channels or a dusty dirt track hasn't been explained as yet.

Since the public meeting at 19 December, Yumbah admitted that some offensive odour "may occur from domestic waste and sediment removal from channels and lagoons". (January response 3-12) We have been advised that the sediment is extremely foul smelling and Yumbahs intentions to deal with offensive waste and sediment is to collect then spread on top of ground surface to dry out and bury on site, Is this still permissible?, as their only free surface to spread/dry and excavate would be on top of the ridge closer to Frank Lodge lookout and "nearby receptors" or into the ridge itself!.

We are also concerned of the 11 metre height of 4 feed silos causing them to be directly [REDACTED] [REDACTED] topping off the unsightliness of acres of shade-cloth covered buildings and solar array.

Yumah advise their 2 Hectare solar [REDACTED] cause us glare. If it should, what would we be able have done about it once it is erected?

Yumbah's response made mention of their intended border fence material but no mention of height or if topped with an electrified wire as Narrawongs high perimeter fence appears to have.

Regarding tourism , Yumbah via GHD states Dutton Way is not regarded as a destination by the Glenelg shire planning dept, despite having a higher short term rental property density than Cape Bridgewater. [REDACTED]

[REDACTED] have shown guests ( including several return guests) the proposal and 100% have stated they would seek accommodation elsewhere if this [REDACTED] proposal were to be approved. This will certainly cause us economic hardship and probably similar to the many other holiday rentals including the TWO caravan / cabin parks within a 500 metre radius of proposal, many of which employ cleaners/ caretakers and booking agents etc. Yumbah appears to be arrogantly dismissive of the existing tourism and recreation benefits of Dutton Way or the North shore of Portland Bay which include sailing, fishing and watching whales or just walking along our re-forming beaches, all of which would be diminished if the proposal were approved.

Glenelg shire council have stated in a March 2018 draft that they wish to “back zone “areas of Dutton Way that are presently zoned rural residential, due to small lots not “utilizing our lots fully” [REDACTED]

[REDACTED] hearing cows mooing, birds singing, waves crashing, and children playing whilst taking in all the pleasant views across rural and marine vistas, including whales (and now their calves) during their seasonal visits. but certainly not suffering a 24 hour a day industrial operations noise’s of pumps , generators , sirens/alarms , vehicles and reversing beepers etc, or the visual presence of industry ,including night lighting. Surely Glenelg Shire cannot now renege on residents that purchased smaller lots ,(that previous councillors approved)and that wish to enjoy a rural residential lifestyle as advertised ,and Glenelg shire council now go on to approve an industrial type development for a “new player” that’s bought a traditional farm and presumes a right to build the biggest land based abalone facility ever , drastically altering land presently used to fatten cows and rear calves at a rate that we could easily define as highly productive and locally considered great summer country and would be lost forever if stripped of topsoil and turned to concrete, shade cloth and seawater. Please consider that no historically typical agricultural farm or feed lot or house lot, would be allowed to enclose by roofed area the same vast area as proposed by Yumbah , their aggregate land area in total should be disregarded in this respect due mostly to impracticality of construction upon ridges etc.

As a keen boat fisherman, I feel a great loss that I and others would be restricted to access the North Shore fishing grounds and species that are presently, and have been publicly available historically, due to Yumbahs offshore pipe networks ,including the pipes that may discharge 400+ tonnes annually of untreated abalone faeces into the immediate ocean., the effects of this volume locally are presently unknown but Tasmanias salmon fisheries plights may already give us some insight. Yumbah attempt to compare nitrogen nutrients from abalone and cattle faeces is flawed as it is very unlikely any cattle feedlot could gain license to dispose their daily untreated cattle manure deposits into a water/sea way at a rate of over 1 tonne per day and many dairy farms recycling through on-site irrigation to paddocks.

My wife and I, and neighbours take great umbrage to Yumbah and their consultants, where they falsly describe the area almost void of residents (receptors!), to support their application when the [REDACTED] clearly shows otherwise. GHD also describe the land area as marginal yet we witness daily 4-5 cows per acre, many with calves at foot, grazing un-supplemented, (total herd est 160+) and the harvesting of silage and hay from the proposals existing area!.

Appreciating EPA is considering the application as it stands, and land values are not to be usually considered, it is widely known locally that foreign (Chinese as a matter of fact) land owners immediately east are keen followers of the progress of this application so they may too apply to develop their farm land similar if Yumbah were to gain approval. If the lands under the shadow of potential future aquaculture proposals here were to be approved, the character of Dutton Way would be changed to that of a bizarre aquaculture ghetto and existing residents and traditional agricultural farming owners would be punished with artificially deflated property values, ours included, leaving the only likely purchasers aquaculture developers as no one else would wish to live in such a degraded area. The Rural Residential Living zone plan should certainly continue to allow rural activities but it also is there to give residents protection from industrial sized high production proposals, agricultural or aquacultural, that would negatively impact the amenity of those residents. Yumbahs proposal would do that to our amenity.

Regarding shore crossings, Yumbah or their engineering consultants have not quoted any quality assurance /control standards, systems of test, Australian or otherwise, how their HDPE pipe systems will be tested at construction or monitored regarding mitigation of seawater loss of containment across crown or private lands etc to and from their proposal.

Regarding whales and their calves, I and my wife know nothing more about them than we feel extremely lucky to be able to watch these fantastic creatures cavort in the Portland Bay/North Shore from our home. We surely are the envy of basically the globe to be able to view such creatures with so little effort as to look out our windows! That is just one amenity we would lose as Yumbahs proposal seeks to place pipe work exactly where whales are mostly seen in this area.

Yumbah Nyamat claim their proposals Dutton Way siting is perfect, but it was also already perfect for the folks that have purchased approved small lots, and most having lived in or gone onto establish our homes with the now naïve belief that residential amenity was to be upheld within rural residential zoning by Glenelg Shire council as per Victorian planning procedures. Surely the fact over 2/3rds of submissions opposed Yumbah's proposal and most included site location, and that Yumbahs proposal is considered far from perfect by any means in so many aspects for Dutton Way. Perfect for Yumbah would perhaps seem to be where they spend as little as possible to establish their factories with minimum regard to saving and respecting existing amenities or the implications of detriment for Dutton Way once their proposals should be approved, as demonstrated by them quoting they don't need to consider set backs and buffer zoning and we have seen via social media posts from nearby residents of Yumbahs existing Australia wide factories demonstrating lack of adherence to specified buffer zones/ vegetation planting, controls of artificial light pollution, odours noise and traffic management. We also saw for ourselves, a quite untidy site at Yumba Narrawong prior to a recent major clean up,

At this point of time its not too late for Yumbahs bold proposal to be sited at a location that wouldn't disturb nature or differently affect people as their present selection will. Surely there is a suitable site between Portland and Port Fairy that supports Yumbahs tenet of placing their factories in only pristine and isolated environments, neither of which describes Dutton Way.

We applaud Yumbahs initiative to design and build such a plant but who-ever guided them to select Dutton Way as a suitable site either has little regard for others in general, no knowledge of the general area or maybe both and has made a poor choice as the many objection submissions demonstrate.

[REDACTED]

[REDACTED]