

Attn: Tim Faragher

EPA

Re: Yumbah Aquaculture planning permit application P18147

EPA reference # 1003316

The response from Yumbah regarding Stakeholder Submissions on EPA and environmental matters, as well as town planning matters, is far from acceptable. Yumbah has provided some very general and inaccurate statements (“will be negligible”, “no risk”, “highly unlikely”, “not a relevant matter”). They have avoided responding to issues through the strict interpretation of definitions and provided no facts and figures from a comparable abalone farm of the size of their proposal.

I would like to address these points below as examples.

Air quality and Dust - it is simple for Yumbah to make a statement like “The site works will be managed to eliminate any potential off-site dust that may result from construction. The risks to rainwater tanks and associated drinking water supply as a consequence of dust generated during construction works will be negligible.” However, it is ridiculous to claim that there will be negligible dust impact during construction of such a massive facility – resident’s amenity will be directly affected.

- How can Yumbah claim there will be negligible impact of dust on resident’s water tanks and drinking supplies?
- What experience has Yumbah got in building such as massive farm in such close proximity to so many homes?

Air Quality and Odour - the consultant company has said there will be no odour – that is the statement Yumbah are presenting. My counter statement is that I have frequented the current abalone location for 15 years and can confirm periods of intense odour. I can also confirm conversation with landowners next to the existing abalone farm who have verified the regular odours from the farm but have been reluctant to comment publicly. My proof is my own firsthand experience over many years not the word of a paid consultancy company briefly visiting a site.

Coastal Sea Wall - Yumbah keeps talking about the existing sea wall as if it is about to collapse – needing maintenance and repair. Repairs have been done periodically over the years by the council, as are many things in the shire managed by them.

- If Yumbah feels the sea wall is so at risk then why are they proposing only to build sections of the wall (for their pipes) that will be able to withstand the potential sea rises and swells of the future? Surely they understand that any sea inundation will find the weakest point of the wall, flow through and come from behind them. The fact that their proposed new wall will not need repair and be able to with stand bigger seas will make no difference if the sea does come in.
- It is obvious that Yumbah is only wanting to build at Dutton Way because of the existing sea wall to reduce their own costs. If they truly felt that the sea wall was a risk they would be planning to replace the whole wall that spans their proposed facility not just where their pipes are planned

Noise and Vibration - Yumbah makes many claims that it will keep noise and vibration to a minimum and within acceptable standards. Note to Yumbah, Dutton Way residents experience no noise and vibration from any agricultural practices at Dutton Way right now – any increase in noise and vibrations will not be acceptable. We did not buy homes here so that we could listen to the sounds of pumps and generators.

Groundwater – The fact that Yumbah will be extracting groundwater – dewatering activities – is a concern to all residents who rely on groundwater for their homes. It is interesting that Yumbah makes lots of general statements about groundwater and the survey says there will be no impact.

- How can Yumbah be certain about this and assure residents of no impact?
- What proof do they have?

Burrowing Crayfish

And what of the vulnerable burrowing crayfish? Yumbah focuses on the marine aspects of the development and conveniently omits any mention of this species (and other land based animals mentioned in resident's submissions), which populates the area of the proposed development and is extremely susceptible to changes in its habitat. This crayfish habitat and the creatures themselves will be destroyed by the proposed massive development. Previous studies of the area have verified the crayfish's existence and vulnerability to any constructions works.

- Why has Yumbah not acknowledged and addressed this important issue?

Power Requirements – One aspect of the proposed farm that has not been mentioned yet is power requirements for the proposed development.

- What power requirements will the facility need?
- Will there be a need for power lines to be added?
- Where are they planned to be located?

Maintaining Amenity within the Rural Living Zone

It is vital to note that Yumbah's website states "Yumbah has carefully sited its farms in isolated area where the vast and ancient continent meets the Great Southern Ocean". Dutton Way is far from isolated. This proposal is for a development in an existing residential area, regardless of what the zoning might be. This development will have a direct negative impact on our amenity, despite Yumbah's claims. On top of dust, noise, vibration and odour (Yumbah has presented nothing that guarantees these won't be factor) there will be huge pipes and new rock walls on our beaches, altering the currents flows of water and sand movements – how is that not affecting our amenity? These beaches are used by Dutton Way and Portland residents, visitors and tourists all the time!

The development would be suited in a better location

To say that this is not relevant to this proposal is beyond belief. Pointing out that there are alternative locations should have direct bearing on the decision made on this proposal. There is adequate unpopulated coastline which can be used by Yumbah. Surely Yumbah have the financial backing to overcome any obstacles that might be in their way in more remote locations – they just need to pursue these locations with the same fervour they are using at Dutton Way.

The use is industrial

A large scale operation using huge pumping stations and operating 24/7 sounds very industrial to me. Please don't hide behind definitions and avoid the obvious. There are many definitions of industry and industrial that can easily be sourced and referenced. You cannot compare this proposal to a herd of grazing cattle, or a farm growing plants or vegetables. Residents are not impacted negatively in any way by the use of the land for the current agricultural purposes. Yumbah's proposal is a totally different type of use, despite how aquaculture might be classified. There is no doubt residents will be negatively affected by this proposed development.

Adverse impact on tourism

Sorry for my ignorance but I was unaware that an area had to be classified as a tourist destination before it can be popular with tourists. Somebody needs to explain that to all the people who holiday at Dutton Way and make use of its beaches, accommodation and caravan parks, that they should not be coming here because Merino, Condah and Tyrendarra have much better accommodation and facilities to provide them a fantastic beachside family holiday. "Dutton Way is not recognised through

the Planning Scheme as a tourist destination” - What a weak argument! Based on this definition, perhaps Yumbah can situate a farm at the Narrawong Caravan Park site as it is obviously not a tourist destination. I am sure the residents of Narrawong would be extremely enthusiastic about this possibility.

Effect on Property values/rates & financial guarantee

Not relevant? Perhaps to those who don't live here, but it is extremely relevant to those who do. We chose this location to buy and build our homes, to build our lives and invest our money, time and efforts into making this a beautiful community to live in. It is extremely disturbing that real and genuine residents' concerns are so blatantly brushed aside in this manner without any attempt at addressing our questions.

In closing I would like to state that Yumbah has shown little respect for the residents of Dutton Way both in the written and verbal communications. They have come across as smug and dismissive of anything we say. They blatantly ignore the fact that residents have invested their time and money to make this place their home and Yumbah displays an entitled attitude that they can just come in and do what they want under the guise of job creation. Yumbah refers to our homes as beach shacks, which is far from the truth. They also focus their public arguments around water quality and avoid mention of immediate and future effects of their proposed development on existing land, homes and animals. Their public approach is extremely misleading – it's not all about water quality and pollution. From the many documents now available it is clear that Yumbah had been working on this proposal for a long time now – residents were never made aware of the plans, involved or consulted during that period. **Why the secrecy?**

This development proposal is part of a greater scourge in Australia where big business is running roughshod over communities and sensitive environmental areas, purely for profit. It is an indictment on the operators, shareholders and investors of Yumbah that they too have joined this blatant disregard for people and places in the pursuit of the dollar. It will also be an indictment on the Glenelg Shire and the EPA should this proposal be given approval – profit only serves the few. We are ratepayers in the shire! Our money goes into the local community not to a small group of already wealthy people.

As we have publically stated, residents are not against the abalone industry or job creation in the shire. We are against the choice of location for this proposed farm – we are fighting for the sanctity of our homes!

A simple solution for Yumbah would be to adhere to its “Our Places” motto and relocate the proposed farm to a truly isolated area.

