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9th of November 2016

Corangamite Shire Council
Planning Department
Civic Centre
181 Manifold Street
Camperdown
VIC 3260

Dear Sir/Madam,

Planning Permit Application PP2016/126

Proposed Princetown Eco-Tourism Development at 79 Old Coach Road, Princetown

The irony of the aforementioned planning permit application would be amusing if it were not so tragic; a unique, virtually unspoiled wetland wilderness, zoned as rural conservation with both significant environmental and significant landscape overlay, being proposed as a suitable site for intrusive, high volume, high impact, luxury, hotel and cabin accommodation development with an "eco" prefix all in the name of cashing in on a quick buck.

This proposed investment does not have the interest of the community nor the environment as a concern. To believe it does, is myopic and naive. The site has been bought for bottom dollar with the view to maximize return expediently without care of the cost to the environment or advantage to the community.

If the proposal is accepted for construction in this location we lose something that will never be regained. There will always be other opportunity, but there will never be another area as unique as this.

This development would impact me and the environment that I enjoy. This letter, objecting to the current siting and format of the proposal, details some of the impacts and concerns in sections below.

Notwithstanding the below issues, there are a number of issues, errors, critical & un-validated assumptions within the reports, studies and calculations that have been conducted on behalf of Montarosa. Not least, the disclaimer statement on the 3rd page of the Planning Application Report: "GHD expressly disclaims responsibility for any error in, or omission from, this Report arising from or in connection with any of the assumptions being incorrect". This basically absolves the consultant of liability on the majority of the

important components within the report as many key assumptions stem from the proponent or are loose and woolly. There are similar caveats at the start of each section which removes liability from the professional expert consultant and lands it with the non-expert company- Montarosa. Some assumptions and data have not been made available for scrutiny, despite request.

Objection 1: Visual Impacts

1.1 The proposed visitor centre has an excessive height that will be visible from the Princetown Township, river, Great Ocean Walk and numerous other locations detracting from the wilderness appeal and the “last frontier” feel of the township and area.

The height and general size of the structure also do not lend themselves to any form of screening by native plantings and it will be the dominating “feature” of the wetland from any South to East South Easterly facing view from the Township. The building and parking does not blend or appear to attempt to blend with the environment.

1.2 The proposed viewing tower will be visible from all low areas on the lower reaches of the Gellibrand and the estuary polluting the natural skyline for miles around and depriving one’s ability to lose oneself in the natural environment without significant manmade visual impact.

Furthermore, there is already an adequate viewing platform within the township- there is no justification for another one in such close proximity.

1.3 The Lodge/Luxury Hotel complex along with the two story cabins is again of an excessive height as per issues with point 1.1, particularly as it will be on elevated stumps to overcome inappropriateness of the siting issues.

1.4 Grading of the land will destroy the fascinating pulchritude of the undulations of the rippled flood plain resultant from thousands of years of weathering and flooding. The majority of these “spits” will be obliterated and levelled- never to be seen or studied in real life again.

If everything was scaled down to single story, able to be screened from all prominent visual aspects, access track following natural contour surfaces and not on such a gross scale, the impact on visual pollution would be to some extent mitigated and maybe more palatable. There are also plenty of other locations that are not as sensitive to such an obtrusive visual impact and would be more suited to a development of such a size and associated visual impact.

There are a significant number of tourists that are attracted to the area specifically because of its untouched beauty. This development will drive those tourists away.

Leaving this area of the Shipwreck Coast undeveloped would apply balance to the already manmade sightseeing tourist developed areas around the main tourist attractions, thus catering for a variety of tourist tastes.

Objection 2 Traffic and Access

2.1 The figures estimated for vehicles (800VPD) are huge and equate to a car a minute, assuming the majority of traffic will be during 12 hours. The report does not make it clear if this is one way or two way traverses for access along Old Coach Road and the bridge. The figures presented within the submission will effectively ruin the tranquillity of the area with noise and dust.

2.2 The volume of traffic will not be conducive with pedestrians crossing the bridge or accessing the boardwalk or old coach road and brings specific concerns in regard to safety.

2.3 The area around the bridge is used by many for swimming. The proposed level of traffic will present noise, dust and access issues to the area and may drive people to less safe swimming spots.

2.3 Access to the boat ramp will be difficult with the volume of traffic and may be hampered as the road is to be built up.

With the increase in vehicles waiting for passing opportunities on the bridge, congestion will increase and parking for boat trailers will be compromised as it is already limited.

2.2 Construction Access; Appendix C Traffic Impact Assessment Section 5.3 – construction strategy for bridge crossing- Options 4 and 5 have no real feasibility:

- Option 3-This is a very expensive option and should be detailed and developed further within the submission for it to carry any credibility.
- Option 4-The cost and practicality to establish a crane pad on the marsh land and double handling the load- alongside the disruption this would present to normal access and the environment renders this option as far from best practice and not even remotely logical.
- The building of a construction road through the national park would be detrimental to the beauty and environment of the park. The road would increase vehicle activity and no longer limit the access to walkers and the odd four wheel drive. It would also remove the FWD track- another attraction for some in the area.

In conclusion the only option is really a bridge upgrade or rebuild (based on the limit being 15 tonnes). This should be included within this planning permit submission and the planning permit is in essence incomplete without this inclusion.

2.3 Parking

The traffic report conclusion states: “Based on the site trip generation, approximately 253 car parking spaces will be required on-site, however the size of the property means that there should be ample room to accommodate these vehicles. Additional area will be provided for overflow parking when required.”

Table 5 of the Planning Application Report states 283 parking spaces with 5 bus spaces.

Buses are unable to cross the bridge due to weight limits- why are they catered for?

The overflow parking area (marked as area 39 on the master plan) sits below the designated AHD for carparks.

The parking facilities do not detail how storm water is treated - there is significant chance of oily waste and hydrocarbons entering the wetlands unless some form of interceptor separation system is included.

Traffic Impact Assessment Section 5.4.6- staff parking assumes that staff work in evenly in 3 shifts of 26 a shift- this unrealistic as day shifts will be higher than any night shift requirement and should be accounted for correctly in the parking requirements.

2.4 Emergency access

The Princetown Recreation Reserve is an emergency rendezvous point for the air ambulance. Has the impact of access to the helicopter been considered?

Objection 3 Environment Impact

3.1 Wastewater

Any issue with the wastewater and sewerage treatment has the potential for catastrophic impacts that would be irreversible on the aquatic wildlife and river system. The river system is already under high environmental stress due to the amount of water that is harvested from the system for Warnambool. To be certain of a successful environmental solution for the sewerage system, the detailed design should significantly developed prior to granting of the planning permit and made available for scrutiny and peer review.

There are currently a number of issues and inconsistencies with the waste water proposal in its current form discussed below.

3.1.1 Waste water volume

The figures quoted in the Planning Permit Submission, Appendix J (Land Capability Assessment), Document 603853 Rev 3, LCA's Appendix B, Rainfall Scenario Model / Calculations for wastewater input "E" appear to be very low for this type establishment.

The figure given for annual wastewater input is 17,269 kL. This is based on the occupancy figures that have not been made available for challenge despite request (see attachment 1 for reference).

Typical water usage for a hotel facility is 227 kL/bed to 435 kL/bed per annum (reference: City West Benchmarking Study, SA Water). For this facility this equates to (66 guestrooms and 10 staff rooms=76: $76 \times 227 = 17,252\text{kL}$ (best practice, low): $76 \times 435 = 33,060\text{kL}$ poor practice, high).

The figures used in the calculations are best practice which is not a likely scenario. FURTHERMORE, these figures do not appear to account accurately for the 300 person capacity restaurant, the visitors to the day centre and other staff. People attending the day centre will have been on the road for a while and looking to relieve themselves- a higher wastewater output than a normal visitor centre- just look at the issues present at the Twelve Apostles visitors' centre.

The Proponent has indicated that there will be kayaking and SUP rental to day visitors. There will therefore require to be change rooms and showering facilities resultant in further wastewater production. These are not detailed in the submission.

Considering the activities available (water sports, swimming, walking, beach.... etc.) and the clientele catered for (not familiar with water restrictions, used to luxurious long showers/spa baths... etc.), the two swimming pools and luxury day spa facilities, the waste water figures, from brief study, are unrealistic at best.

If we look at a more likely scenario of water usage the whole effluent dispersal and evaporation requirements become unsustainable for the capability of the available land.

Potential Solutions:

- Make treatment output Class A
- Recycle Class A water through WCs and swimming pools

3.1.2 The Brian Consulting Report is stated as preliminary and is the basis of information for the soil type and capability in terms of percolation, permeability, etc. for the dispersal of effluent via irrigation. This report has not been made available for review in the submitted LCA assessment. The fact that this report was undertaken prior to the final layout or the requirements placed on the development in regard to flood levels and effluent field positions may result in the test soil sample bores and soil studies within this report as utterly irrelevant for this application. Further details are required in the proposal to confirm the suitability of the test sample bores and their position.

3.1.3 The wastewater treatment plant appears to sit around 2.1 AHD or higher. The guest areas habitable floor is at 3.5 metres- this does not provide enough fall for the transport of raw effluent.

Potential solutions would require the system to have lift pots or some form storage containing raw sewerage below 2m AHD or, usually noisy, pump and macerator systems at the points of raw effluent production to transport the effluent from the guest and visitors' areas to the WWTP. If it is the latter and there is a power outage WC's showers etc. will not be able to be used. If it is the former there will be raw sewerage stored below the recommended flood levels. This is not covered in the LCA risk assessment nor detailed in any manner in the design.

There would also be trenching required for sewerage pipework through the site below the agreed flood plain- this will also be under pressure as opposed to gravity delivered presenting leakage problems in the event of line failure.

There is no mitigation discussed for power failure impact on the WWTP or the effluent transport system.

3.1.4 Considering the risk that raw sewerage presents to the wetlands bunding should be considered around untreated wastewater storage and treatment facilities to capture accidental leakage or containment failure.

3.1.5 The lagoon may present breeding grounds for flies and mosquitoes and bacteria or other pathogens that could spread by these insects or fauna.

3.1.6 Power failures are common in this area of the state. No discussion in the submission of how the wastewater system mitigates this issue.

3.2 Fauna impact

Report fails to assess what the increased human population, activity, vehicles, noise and light will have on the bat population present in the area. It only talks of specific habitat not being interfered with- not an overall environmental impact of the noise, litter, light, odour, high level structure and people that the proposal will bring.

There is high potential for impact to critically endangered bat species (Southern Bent wing) and other bats and birds that can be observed fishing and hunting over the water at dusk and late evening when fishing.

Platypus have been reported in the river- I have not seen one. I believe that the development and increased activity will deprive me from the opportunity of seeing one in the lower reaches of the Gellibrand.

3.3 Litter.

No litter strategy or control has been mentioned in the submittal. Cultural attitudes are different to littering across the world. No impact study has been conducted for the increase in litter that will occur.

Objection 4 Water

The proposed use of bore water is concerning. Use of this resource without full knowledge of its ability to replenish itself should be heavily scrutinised with every alternative reviewed.

The use may impact on the bore water quality in the township that many rely on. What will be done if the water supply is compromised?

If the WWTP should produce Class A water this should be utilised within the facility as WC flush water, wash down water for equipment and other uses.

The roof area assumptions in the WA Application table B3 are erroneous for eco cabin roof areas.

Objection 5 Power

An upgrade of power lines will be required. These currently pass over my property.

I do not want more obtrusive and higher voltage lines with associated higher electro magnetic fields passing over my property.

Power should be re-routed- ideally underground.

Power supply in the area is temperamental- there is no discussion on emergency supplies within the submission nor the consequences to guest safety in the event of a power cut.

Use of renewable power is not discussed. Why has solar not been considered particularly with the "eco" prefix being touted in the application?

Objection 6 Flooding and Hydrology

The hydrology study is key to the siting of buildings, effluent treatment facility, effluent field, effluent lagoon and access ways. It's accuracy impacts critically on the feasibility of the entire proposal.

The data used in the report is limited to less than 8 years which is not sufficient for a true representation of flood data.

Other gauging station data upstream has little relevance due to the tidal nature of the reaches of this section of river.

The gauging instrumentation is designed to read accurately within a set range. When that range is exceeded the data is often erroneous. There is no discussion of this issue in the submission and accuracy is assumed.

The modelling is static and boundary limited. It will not take into account the dynamics of tidal events and other climatic phenomenon like high onshore winds. The modelling needs to be peer reviewed by independent experts and dynamic modelling should be undertaken to fully understand the impacts- providing suitable data can be obtained to enter into the model.

The modelling does not assess impacts further upstream outside of the modelling boundary. There will be impacts resultant from the build up of the road (which will act as some form of levy despite culverts) and the other areas of additional fill that will be brought into the site.

Objection 7 Zoning and Titles

The titles show that part of the river is covered under the title. This was not the intent of the original title and is resultant from erosion. Should the riparian section of Crown Land be reinstated?

The land has been zoned and overlaid in a manner that does not permit buildings. I also understand that the Shire have previously not granted permits for habitable buildings in this area thereby creating a precedent.

There are far more suitable locations with the lesser environmental sensitivities and planning issues that would be available for such a development.

Yours faithfully,

