

## **Objection to EPA works approval Application**

### **Who is making the objection**

**Name:** [REDACTED]

**Address:** [REDACTED]

**phone no:** [REDACTED]      **Email:** [REDACTED]

### **Which application do you object to:**

**Application No** 1002429

**What is purposed:**The proposal is for the construction and operation of a wastewater treatment plant at the proposed Eco-tourism Facility.

**Address:** 79 Old Coach Road Princetown. Victoria 3269

**Applicant for the permit:** Montarosa Pty Ltd

### **What are your reasons for objecting:**

1.The wastewater treatment plant (WWTP) is going to be placed at 2.02M AHD. During a storm event May5-14<sup>th</sup> May 1915 the storm surge from this weather system resulted in the estuary water level rising to 2.01M AHD. With global warming predicting to rise the sea level and increase storm events. A breach of a WWTP at 2.02M ADH would release contaminated waters into the estuary wetlands of National importance and into Marine National Park.

2.It is not stated how big the swimming pool and therefore how much water it would hold. Also the swimming pool spillage (2.6.1) will not be directed to the WWTP. The placement of the swimming pool would be above 1.8M ADH but it site height has not been identified. It may be also be identified as been in danger of been flooded with a large flood event, releasing a plug of chlorinated water into the wetlands.

3.80% of the water used on site is will be obtained from ground water. Comments in Appendix A “..there is some inconsistency in the mapped groundwater salinity in the water table aquifer at the site, and further work would be required to confirm the groundwater salinity and the protect beneficial use segment”. Therefore Montossa Pty Ltd have not confirmed the water use on the site is portable. To subside the water shortage they are going to be trucking water in, but the bridge on Old Coach Road over the Gellibrand River has a 15 tonne limit.

4. Montarossa Pty Ltd have not explained how they are going to reduce the risk of irrigation water (Appendix E P30) run off entering drainage lines and waterways.

### **5.Removal of Biosolids**

The Bridge over the Gellibrand River has a limitation of 15 tonnes. Every 18 months it is predicted that 90m<sup>3</sup> of biosolids will have to be removed from the WWTP. This report does not say how they are going to be removed with what tonnage of truck.

## **Objection to planning permit application**

### **Who is making the objection**

**Name:** [REDACTED]

**Address:** [REDACTED]  
[REDACTED] [REDACTED]

### **Which application do you object to:**

**Application No** PP2016/125

**What is purposed:** The use and development of an integrated Eco-tourism Facility,. Being a residential hotel , group accommodation, restaurant and pleasure boat facility, removal of native vegetation and alterations of access to road zone category 1 and application for a liquor licence.

**Address:** 79 Old Coach Road Princetown. Victoria 3269

**Applicant for the permit:** Montarosa Pty Ltd

### **Reasons for objection**

#### **1. Transport, traffic and access.**

100% of the traffic will be entering off the Great Ocean Road (GOR) onto Old Coach Rd (OCR). “Estimated traffic generated by the proposal would require alterations to the intersection of the GOR and OCR to avoid impacting the operation of the intersection”.

On Page 43 schematic diagrams are showing short channelised right turn (CHR(S)) treatments expressed on a straight stretch of road. This intersection is a sweeping bend which has no road side buffer as it borders the Latrobe River wetlands. To increase the width of the road there would have to be major fill into the Latrobe wetlands. There is no comment in this application to the environment and hydrology effects that this would cause.

This application has stated that between 2009 and 2013 that there had been no major accidents on the Old Coach Rd. The Old Coast Rd is a single gravel road leading onto a 4 wheel drive track where traffic speed is limited due to the conditions. These are very selective years. As stated before all the traffic will come from the GOR. In 2014 a bus ran off the road, 1 dead, 4 injured, in 2005 a single bus crash injuring 28 , serious injuring 2 people and in 2006 there was a car accident with 1 person dead, all accidents happening in the sweeping bends of the GOR not far from the GOR and OCR intersection. The GOR road had not had a major upgrade since these accidents. Majority of the injured are international tourist, who do not know the road and road rules (personal experience of cars been driven on the wrong side of the road toward you on the GOR). Due to the many corners in the road prior to the GOR and OCR intersection and large numbers of cars that are predicted to go to the proposed resort this would make this corner a very dangerous intersection for all travellers.

[REDACTED]

## **2. Emergency Response**

Bush fire in this document is listed as a 'rare occurrence' but with increased visitor numbers the probability of fire starting is also increased. The position of the development is beside the Cape Otway National Park and in the Princetown wetland. To accommodate the Cape Otway fire plan the some of the proposed accommodation has been placed below the 1.8m ADH line into the Princetown wetland. Grass/scrub as little as 10cm high can carry a fire in the right conditions.

The bridge over the Gellibrand River has a 15 tonne limit which would mean that the local CFA trucks weight is at the very upper limits to go over the bridge if there is a fire emergency at the proposed Eco Resort.

There is only one entry in and out of this proposed Eco Resort which would make it a not ideal for bush fire emergencies.

## **3. Construction access to the Eco Resort**

As the Bridge over the Gellibrand River is single lane and has a 15 tonne limit it is commented that larger trucks could off load onto smaller trucks to go over the bridge or they could go to the small bridge at Rivernook (tonnage limitation yet to be determined it) 5 kms away on the Old Ocean Rd. This crossing accesses private property and there is no road on the other side. Therefore a road to the proposed resort would have to be constructed. There is no comment in this report on environmental effects of having another road breaching the wetlands.

## **4. Panoramic lookout structure**

This single stands out structure at a height of 15m, towers over the restaurant development on site and would be very visible from a long distance.

## **5. Appendix M Preliminary Hydraulic Report.**

The build up of the Old Coach Road, in some parts 500mm, so that there is access to the Eco Resort during wet months is explained will cause minimal disturbance of the flow of the river. Any physical structure that causes a slow down of the river flow will cause a back-flow and slower discharge of the water upstream therefore causing greater flooding upstream.

Statements such as this on Page 3

“..large number of assumptions which may or may not be correct and will have an effect on the modelling output”

Do not give the reader any confidence that the the hydraulic report is correct.

Flooding of the Gellibrand River wetland is caused (most of the time) by the closing of the Gellibrand River by a sand bar at the mouth during the beginning of winter. This is a natural occurrence. Over the years this bar has been artificially breached under strict guidelines by CCMA and Parks Victoria. When the all the trigger points



have been reached. The height of the river at the Gellibrand River bridge is only one of the trigger points. There are occurrences where the river height is high but the river can not be opened due to the other conditions not been reached. Therefore it is not as simple as the River is high and will flood the Eco Resort let open the river. The flooding of the Princetown wetlands in 2010 is a point in case where the high river levels were added to by a storm surge putting the river level at 2.01m ADH. This level is above the line of 1.8m ADH that the proposed Eco Lodge development is going to built.

