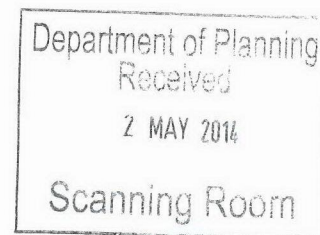


PCU52982

Graham Winn
49 Cambage Street
PINDIMAR NSW 2324

10 April 2014

Attention: Director, Industry, Key Sites and Social Projects
Development Assessment Systems & Approvals
Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001



Dear Mr Hazzard

Application Name: Proposed Pindimar Abalone Farm

Application #: MP 10_0006

I strongly object to the proposed Pindimar Abalone Farm.

Declaration re: political donations: I declare that I have not made any political donations in the previous two years.

Reasons why I object to the proposal:

I strongly object to this proposed Abalone Farm.

My reason for making this submission is that I have a personal interest, as I was born and raised in the area. My great grandfather, Jessie Motum, was the first white person to settle in Tea Gardens. I was brought up to respect the sensitive environment.

I have many concerns regarding the above development proposal, but I will concentrate on just three major issues:

- 1 Environmental concerns, including pollution of the Bay of Port Stephens
- 2 Noise Impact
- 3 Traffic Problems

1 Environmental Concerns and Pollution

- a) According to City Plan Services, reporting for the above project, a *"full production of up to 50 megalitres of marine water will pass through the farm system daily"*. This water will then be returned to the Port as effluent.

"Research by Mudrak, 1981 found that a properly designed sedimentation system for aquaculture farms should be able to remove from 85% to 89% of solid waste", later amended to 80% as a more conservative estimate.

The proponent admits that “*some waste*” will go into Port Stephens. But 20% of unfiltered waste is a considerable amount! “Experts” can’t really predict whether the marine life will be adversely affected. No one can.

- b) From City Plan Services, again, “*there are considered to be two potential groundwater impacts associated with the farm comprising seepage of marine water from the farm facilities into the groundwater system, and contamination of the ground water via chemical usage or spillage*”. Nineteen chemicals are listed for ongoing use, and as accidents happen, how can the proponent be absolutely certain that no detrimental effects will result? Even the best intentional precautions are not infallible.
- c) The proponent said that there will be “*scientific, environmental, social and commercial benefits*”. No precedent exists for this type of industry in an estuary such as this – being the confluence of two rivers. This is not a coastal site.

As far as environmental benefits are concerned? I can’t see any benefit when a beautiful Osprey Eagle will lose it’s home of many years when it’s tree on the proposed site is removed, when sensitive weeds and other marine life are threatened, when tiny turtles, sea horses, and fish spawn (all known to exist in Port Stephens) may never reach maturity either through being sucked into the pipes – despite the filters – or being killed by the toxic 1000kg of nitrogen (as well as ammonia) being deposited in the Port. The neighbouring SEPP 14 Wetlands will also be threatened by polluted run-off from the site. Two wetlands are affected.

Information is still inconclusive as to whether or not there is a core koala habitat on the site. According to City Plan Services, there will be “*clearing of approximately 65 trees....this includes the clearing of around 13 habitat trees*”, one being the aforementioned Osprey Eagle’s home.

Also: “*disturbance of about 0.2 ha of understorey vegetation from pipeline construction, including 0.14 ha of EES (swamp mahogany, paperbark forest; and the disturbance to small areas of saltmarsh vegetation (an EEC) and mangroves associated with the construction of an emergency egress boardwalk*”.

“*Intertidal mangrove habitat pipes proposed to be buried through this area, requiring the trimming of two mangroves, potentially resulting in the death of one tree. Disturbance to a number of seedlings and mangrove pneumatophores (including lateral and aerial roots) is also likely. Transplantation of disturbed seedlings is proposed.*”

Has successful transplantation of mangroves been achieved in the past, and who is going to count the number of trees at risk to hold the proponents accountable?

2 Noise Impact

The proponents have stated “allowable noise levels” as follows:

Urban residential areas: up to 65 decibels

Urban industrial areas: up to 75 decibels

However, they have given no estimates of the expected noise levels resulting from their generators, air conditioners, refrigeration units, and pumps – even if situated below ground. Plus “about” an additional 24 vehicle trips per day from service trucks once the factory is operating. This is totally unacceptable!

It would appear that a rather obscure noise impact assessment was carried out in Cunningham Street in March 2011 (Appendix 21), citing noise from barking dogs, bird chatter, bats and even traffic noise from the highway. How ridiculous! The figures don't make sense, and what does it have to do with noise resulting from a factory operating 24 hours a day, 7 days a week in a residential area (across the street)?

4 Traffic Problems

The proponents give their address as 180 Clarke Street with a viable access to their proposed industrial site, yet they expect access via Cambage Street, the second longest and busiest in the village.

The reason they give is that they would have to remove too many trees. They are only too willing to sacrifice 65 trees, including the habitat of the Osprey and 12 other wildlife habitats.

I contend that it is much more likely that they are trying to avoid the extra cost of constructing a road directly to the site.

Why should the problem become that of the residents of Cambage Street, who are likely to be lumbered with another increase in their rates to compensate for the additional maintenance required on our roads?

Should the project be granted approval, then ultimately fail, as has happened in other states (where conditions are more favourable than at Pindimar) who will be responsible for the irreparable damage to our local environment?

Once again, I **strongly** object to Application # MP 10_006.

Yours sincerely



Graham Winn