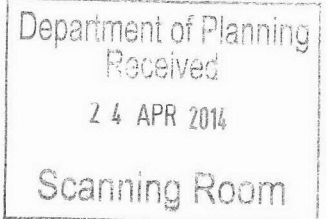


PCU52820



Attention: Director, Industry, Key Sites and Social Projects
Department of Planning & Infrastructure NSW
GPO Box 39, SYDNEY NSW, 2001

c.c. The Honourable Mr. Brad Hazzard Minister Planning & Infrastructure NSW

RE: Application Number MP 10-0006 (Pindimar Abalone Project)

We have not made a reportable political donation in the past two years and we would prefer that our names and contact information be withheld.

Record of Objection:

I strongly object to the proposed development of an Abalone Farm within the Port Stephens estuarine waters.

In terms of the Director General Requirements, subsection General Requirements, paragraph 6, I request the Minister to reject the proposal because of misleading information contained with the Environment Assessment Report [EAR] regarding access and traffic.

I understand that the EAR must not be misleading, inadequately justified or missing important information that may affect the Minister's decision.

Recommendations:

1. I strongly recommend that the minister, or agent(s), visit South Pindimar before any decision is made. Please contact Judith Richardson, Chairperson Pindimar Abalone committee for the Pindimar/Bundabah Community Association, Contact phone 0402655790 or write to 16 Cambage Street, Pindimar NSW, 2324.
2. I recommend that the Minister reject the proposal because of the misleading information provided regarding traffic access and traffic volumes

Matters Arising and Points to Consider:

Please find below reasons for the objection and recommendation to reject the proposal on the grounds of misleading information within the EAR, lack of justification for statements, and for omitting important information from the EAR.

EAR page 37: The Traffic Access Summary is misleading and information is missing emphasis within the EAR.

1. Paragraph 2: Proposed access is loosely described "via existing public road network" being Clarke St-Cabbage St-Como St-Challis Ave.

- a. The term '**existing public road network**' is misleading. *I recommend the minister, and/or his agent(s), visit the South Pindimar village, and the proposed adjacent development site to get a true perspective.*
- b. EAR fails to highlight that the current proposal will mean industrial and transport vehicles will be travelling an extra 2.3 km, through the residential village in lower Clarke and Cabbage St, instead of via the existing site access via 180 Clark Street property.
- c. Use of lower Clarke Street and Cabbage Street will disrupt neighbours, residents and holiday makers.
- d. EAR fails to emphasise that Cabbage Street is no thoroughfare, ending in a cul-de-sac and signed 'No Through Road'. Cabbage Street is 'a residential access' road and with no thoroughfare. It is an established 'no through road' ending in a cul-de-sac. Please be aware that:-
 - i. Cabbage Street has only a bitumen tar skin-seal on the road. All that is required for its use for residential access.
 - ii. The skin seal will crack and pot-hole from the heavy vehicle use required by the proposed development. Especially in wet weather.
 - iii. To make the road stronger and suitable for the proposed heavier traffic, Cabbage Street requires at least 50 mm asphalt overlay. This was discussed with a bitupave worker of 20yrs + knowledge and experience.
- e. Como Street is described as part of the "road network" in the EAR. Como Street is an un-maintained, single lane, loose gravel track with no pavement.

See below the gravel 'potholes' in the photo from the corner of Cabbage St/Como St.



- f. Challis Ave is described as part of the "road network" in the EAR. Challis Avenue is actually an un-maintained, single lane, loosely compacted gravel track with no pavement. It consists of a layer of gravel over an existing sand-trail.

See below the surface is gravel on sand in the photo from the corner of Como St and Challis Ave.



2. **Paragraph 2:** also states "The creation of new roads" (within the property is)"undesirable" (because it requires) "additional vegetation clearing."
- a. I noticed that the Site Access Plan [page 37] does not show the already existing access from upper Clarke St and the existing track which leads to the proposed development site.
 - b. The EAR does not adequately identify that this track within the property is currently accessible by the owner through the gate at the upper 180 Clarke St entrance. *I noticed that the owner has padlocked this gate to stop unauthorised access.*
 - c. The EAR fails to adequately assess why the proponent is not developing and using existing property access from Clarke Street :-
 - i. An access gate and track exist on the owners property
 - ii. Trees have already been felled to form the existing track that can be used to provide access to the development site.
 - iii. Distance to 180 Clarke Street is shorter by 2.3 km to the site boundary access proposed in the EAR.
 - iv. If the Owner provides use of his own property access, this will minimize the impact upon existing, long-standing residents in the Pindimar village.

- d. The proponents' reason for not using existing track on the property was provided in paragraph 2 as "The creation of new roads was considered undesirable due to impacts associated with additional vegetation clearing."
- e. The EAR fails to disclose the other reasons why the proponent is not developing and using existing property access from Clarke Street are:
 - i. It is cheaper for the proponents not to develop the internal property road at their own expense, and
 - ii. The owner discourages internal use of the property because this will disrupt the property owner's future development and market value of '180 Clarke St property subdivision. The landowner has already made application to Great Lakes Council for Subdivision of the property at 180 Clarke Street into 10Ha lots. I presume the owner does not want industrial traffic running past lots he wishes to sell.

3. **Paragraph 1: assumes "existing traffic volumes" are low.**

- a. The EAR fails to investigate, assess, record and report to the Minister a valid base level assessment of how low current traffic volumes are in the South Pindimar village.
- b. We actually did a count and there are 24 full time residents in Cambage St. The other residences are holiday homes.
- c. The 24 full time residents' average only 1 or 2 return trips per week.
- d. Estimated average daily usage is 7 trips per day:-
 - i. $(24 \text{ residents} \times 2 \text{ trips}) / 7 \text{ days} = 48 / 7 = 6.85 \text{ trips per day.}$
 - ii. Garbage collection once per week = 0.28 trips per day.
- e. The EAR fails to use current traffic numbers as a base for measuring the proposed change in volume of traffic.
- f. The EAR fails to stress that the proposed increase in daily traffic volumes will more than double, if not triple, for the residents furthest from the development, at the eastern end of Cambage St;
- g. Daily traffic volumes will be even higher for those closer to the development.
- h. The EAR fails to include and account for "heavy" vehicles during construction period that will deliver and remove materials and heavy load trucks bearing excavators, site huts, front end loaders and equipment.

4. **Paragraph 3: states "This traffic generation is considered to be low...."**

- a. Based on the proponents figures, the closest resident to the development who averages 1 return movement every second day will incur an increase of up to 3900% during construction and 2300% during operation. The residents at the eastern end of Cambage St will have to tolerate a minimum increase in traffic movements of 100%. This is not Low!
- b. However, the proponents' daily traffic movements appear to be understated.
- c. The EAR does not highlight that there is currently no regular, rural commercial or industrial vehicular traffic rattling down Cambage Street because it is a 'no through road'.
- d. During construction, the EAR's reported 'Estimated daily movements' omits
 - i. all of the 35 workers' vehicles. [Refer EAR page 23]
 - ii. all of the heavy load trucks delivering and removing site materials, fill and waste, site sheds, tanks, concrete, pumps, machinery, excavator(s), crane(s) and front end loader(s). [Refer EAR page 23]
 - iii. all additional service vehicles for sewage and garbage collection.
- e. During operational period, the EAR's reported 'Estimated daily movements' $[12 \times 2 = 24 \text{ movements}]$ omits:-
 - i. all of the 15 workers' vehicles. [Refer EAR page 23]
 - ii. the proposed research and education personnel vehicles [Refer EAR page 23]
 - iii. all additional regular service vehicles for sewage, biomass and garbage collection.
- f. The EAR failed to investigate and report that there are only 24 full time residents in Cambage St.

- g. The EAR fails to accurately estimate the proposed increase in daily traffic vehicle numbers and so is incorrect and definitely misleading.
- h. The EAR fails to note that 'actual' traffic movements resulting from the proposed development will be high impact upon village residents and holiday makers of Cambage Street.

