

Anna Bay Resort Objection

In my opinion the EIS significantly fails to adequately describe and assess many critical environmental impacts of the proposal both from construction and operation of the facility. Additionally, the proposal is defined as 'eco tourism' and I suggest that the proposal is not of a type of development that is permissible under the site zoning.

As a member of the Blanch family, I have ties to the proposed development site, dating back seven generations to the 1870's. The rural atmosphere and unique nature of the land has always been central to the way the Blanch families have lived, worked and played.

There are currently four generations of the Blanch family enjoying the idyllic country lifestyle that this land provides, as it also did for the previous generations.

The proposed resort will destroy the ambient amenity that we enjoy.

A summary of my concerns are listed below:

Acid sulphate soils (ASS)

There is no ASS impact assessment provided in the EIS, simply a reference to a sampling programme that clarifies that Potential ASS and Actual ASS are present over most of the site. Given the sensitivity of the local environment, this lack of impact assessment is unacceptable.

Groundwater

The EIS as result does not provide an impact assessment of the project on neighbouring groundwater users. Similarly, while the EIS notes the existence of groundwater dependent residences and ecosystems, the failure to numerically assess groundwater drawdown, means that the EIS's assertion that no detrimental impacts are anticipated (page 12 of appendix 11) cannot be substantiated.

Traffic

The Traffic report (Appendix 15 of the EIS) notes that *"90,000m³ of fill will be required for the site which will be delivered using truck and dog combination that have a capacity to carry 30 tonnes (16.5m³) per load and as such will generate approximately 5,500 loads or 11,000 truck movements during the site preparation period"* and that this operation would continue for 4 months five and a half days per week.

I am concerned at the safety aspect of so much traffic entering and leaving the site and joining Nelson Bay Road.

Where is the land fill being sourced?

What damage is being done to the site where so much soil is being removed?

What traffic issues will it cause at the removal site?

The EIS notes that access to and from the hotel will peak on Fridays and weekends, It is not clear from the EIS if the 1095 movements are averaged or if they account for this peak. If the peak has not been considered, the daily movements will be significantly higher, further increasing the impacts on local residents and the safety of the travelling public on Nelson Bay Road.

Noise

While the EIS is oddly silent on the date of background noise monitoring, the Vipac report (Appendix 13.1) shows that monitoring was undertaken during major roadworks being undertaken on Nelson Bay Road in May 2014. We assume therefore that the calculated rating background levels, the resulting project specific noise levels and the predicted impacts are all incorrect. Interestingly the EIS predicts a drop in noise levels, even though the traffic flows are predicted to increase by 7% due to the hotel. The reason given is the lateral movement of Nelson Bay Road by a few metres due to recent widening. More likely though the predicted reduction is due to the incorrect and higher rating background level that was calculated from background monitoring undertaken during roadworks. How will both construction noise and operational noise affect the surrounding neighbours? Should not all the neighbours residences have been sampled?

ESD

One of the key determinates on eco-tourist credentials as clarified by Clause 5.13 of the Port Stephens LEP is that power and water sources should be renewable and efficient. A preliminary ESD assessment is provided. However I note the following serious gaps in ESD in the EIS in this regard:

- there is no detailed energy assessment
- there is no guarantee of renewable energy usage – it is intended to explore the potential for solar panels (pg 5 preliminary energy assessment)
- there is a recommendation to use a Green star tool as a design guide but assessment is provided
- no consideration of Green Star ratings
- there is no energy modelling
- the bulk and scale of the hotel means that on-site water supplies cannot be sufficient
- the provision of 588 carparks alludes to the fact that individual private car transport will be used for access.

As stated in the preliminary energy assessment, to ensure an ecological sustainable outcome a high Green Star rating is required. Due to the requirements of the Green Star rating to avoid areas of ecological significance such as EEC area, the proposal would have great difficulty in achieving a high Green Star rating, hence the assessment suggests to avoid this and use it as a tool only. If the proposal is required to fit the definition of an international 'eco tourism' resort, then surely international standards to define such a claim should be justified by a high Green Star rating. Failure to achieve this undermines the 'eco' aspect of the proposal and hence the definition of the proposal as 'eco tourism'.

Community engagement

The EIS is silent on community engagement notwithstanding the clear requirement in the DGRs (page 6) to consult with affected community and landholders. Certainly neither the proponent nor the EIS consultant has engaged with adjacent landholders. No attempt to engage or understand the landowners connection with the land or history has been part of the EIS process.

Community engagement has not occurred and there has been no emphasis on anticipated social impacts. The failure of the EIS consultant or the proponent to engage with the local community is clearly an adequacy issue and the statement in the EIS that the consultant engaged with community groups is misleading at best.

I consider that the proposed development at Anna Bay is unacceptable and therefore should be refused.