



Department of  
**Primary Industries and  
Regional Development**

Your reference: A1872  
Our reference: LUP 2230  
Enquiries: Leon van Wyk

Erin Gower  
Development Services Officer  
Shire of Nannup  
PO Box 11  
NANNUP WA 6275  
[nannup@nannup.wa.gov.au](mailto:nannup@nannup.wa.gov.au)

21 August 2025

Dear Erin

**COMMENT: Development Application - Lot 43 East Nannup Road, East Nannup – Proposed Nature Based Park**

Thank you for the opportunity to comment on the proposed Nature Based Park at Lot 43 East Nannup Road, East Nannup.

The Department of Primary Industries and Regional Development (DPIRD) does not object to the proposed Nature Based Park at the abovementioned lot, but would like to provide the following comments:

- A Pet Management Plan is required (if pets are allowed in the park) to ensure that pets are responsibly managed and not allowed to enter the neighbouring property or paddocks where livestock are grazing.
- It is not clear from the application if guests will be allowed to interact with livestock on the property. If that is the case the applicant must have a plan to educate guests about their legal obligations under the ruminant feed ban (feeding prohibited feed sources (e.g. meat) to ruminants (e.g. sheep or cattle) directly or inadvertently).
- DPIRD recommends the development of a Biosecurity Management Plan to address the risks of spreading or introducing new weeds or pathogens. The Biosecurity Management Plan should also include measures to prevent guests from trespassing onto restricted areas and neighbouring properties.

If you have any queries regarding the comments, please contact Leon van Wyk at (08) 9780 6171 or [leon.vanwyk@dpird.wa.gov.au](mailto:leon.vanwyk@dpird.wa.gov.au).

Yours sincerely



Timothy Overheu  
**Interim Director**  
**Agriculture Resource Management and Assessment**  
**Fisheries and Sustainability**

## **Submission regarding Ikigai Farm Nature Camp Proposal - Lot 43 E Nannup Rd**

Attn: Erin Gower  
Development Services Officer  
Shire of Nannup  
Re: Ikigai Farm Nature Camp Proposal - Lot 43 E Nannup Rd

Dear Erin,

I am writing to object to the above proposal. I grew up in Nannup on a directly adjacent farm to the proposed site. Since April of this year I have served as a GP at Nannup Medical Centre and, over the same period, I have been co-managing the farm. My wife and I are planning to build a home there for ourselves and our soon-to-arrive twin daughters. I therefore have a direct and ongoing interest in the outcome of this development application for what the applicant labels a “Nature Based Park.”

The application sets out forty “self-contained” sites with “vintage” caravans in stage one, plus an “event overflow” of undefined capacity. Management is to be off-site. The proposed development site is not bushland but open pasture, nearby landscape includes a pine plantation to the east and a degraded stream to the north. A single marri tree stands over at least two of the proposed caravan sites. There is only a 6m setback from the property boundary, and no clear plan for sullage or grey water disposal and does not address bushfire risk.

It is of substantive note that the nominal applicant is Ms Emmi Lee Taylor, the spouse of Mr David Taylor, CEO of the Shire of Nannup and the property owner. Mr Taylor has both an indirect (as spouse of the business owner) and direct (as landowner) financial interest in this development. I trust Mr Taylor will abstain entirely from involvement in the assessment of this proposal, and that Council will ensure there is no abuse of authority in its consideration.

My objections are as follows:

1. The appropriate legislation requires a Nature Based Park to be predominantly formed by nature and to offer a low-impact experience in a natural setting. The development is proposed in the middle of extensive pasture, the surrounds include a pine plantation to the east and a severely degraded stream to the north, there is a small amount of native vegetation along Nannup Brook on the property which patrons would pass on their way to the campsite but this is distant from the proposed development. I do feel that, per the proposal, environmental impact would be minimal although this is primarily because there is limited environmental value to be protected
  - While I am uncertain if this is in breach of any planning regulation, the sole tree on the site is aged and prone to limb drop. The proposal places campsites beneath its crown, creating a foreseeable and potentially fatal hazard. The most obvious way to manage this risk would be felling the tree, which would eliminate the last scrap of “nature” claimed by the applicant.
2. With forty sites and undefined overflow, traffic volumes could exceed 100 vehicle movements per day. East Nannup Road is narrow, winding, a road train route, and part of the Munda Biddi cycle trail. The proposed entry point lies on a bend and itself poses a risk to large volumes of traffic. East Nannup Rd is arguably not suitable for its current traffic load without this additional burden.
3. A 6m setback fails to buffer noise, dust, or litter, and may restrict safe use of agricultural chemicals on our adjacent farm which contravenes Local Planning Policy 9 on protecting established land use of adjoining properties.
4. The proposed caravan park is located in a designated Bushfire Prone Area. Yet the application includes neither a Bushfire Attack Level (BAL) assessment nor an evacuation plan, despite the need to plan for the

safe evacuation of more than 200 people. The proposed 6 m setback does not provide defensible space in the event of fire. Any escaped campfire would immediately threaten adjoining properties including our own. This risk is compounded by current land management practices as the adjoining paddock is annually cropped for hay and left uncut into the beginning of the bushfire season. The combination of unsupervised campers, inadequate buffers, and poor fire planning poses an unacceptable increase in fire risk. The proposal does not meet the requirements of State Planning Policy 3.7 or the DFES guidelines and again does not respect established land use of the adjoining property.

5. Off-site management raises questions about waste disposal, adherence to fire bans, and policing of visitor behaviour. These concerns are compounded by the conflict of interest identified above, which undermines confidence in enforcement of concerns raised by neighbours once the caravan park is established as such enforcement would fall under the jurisdiction of Mr Taylor. While this conflict should not preclude Ms Taylor from her right to operate a business, Council would need to clarify how this conflict would be managed.
6. The proposal's reference to "vintage caravans" requires clarification. Are these to be carefully maintained vehicles of genuine heritage value, or simply old caravans acquired on the cheap that will become eyesores and degrade the rural character of the area? Without clarification the visual impact of this caravan park on the rural character of the area cannot be ascertained.
7. While the Taylor's may have every intention of developing their site with permaculture and sustainable design as outlined in their proposal this is not the history of the property management to date. Observation from the neighbouring property is that cattle are grazed on the land using set stocking rather than current best practice of rotational/regenerative grazing. On this basis I find it implausible that there is a genuine ideological commitment to regenerative agriculture as suggested in the proposal and therefore doubt that this will be an ongoing commitment if this proposal is approved.

I was shaped by this town and have called Nannup my home throughout my absence and am now settling here for good. I want the town to thrive, and I recognise the need for sustainable tourism and accommodation. These objections are not simple NIMBYism, they are the considered opinions of someone deeply invested in Nannup's future. I do not necessarily oppose the further development of accommodation on East Nannup Rd or even on Lot 43 if planned with thought and consideration but this proposal is slapdash at best.

This proposal is fatally flawed. It does not meet the definition of a Nature Based Park, introduces potentially life-threatening hazards, creates unacceptable traffic risks, provides no adequate buffers, interferes with established land use on an adjoining property, and is compromised by a glaring conflict of interest that raises questions not only about the planning and approval process but also policing of shire regulations going forward.

Council cannot approve this application. The only proper outcome is outright refusal. I await Council's unanimous rejection.

Sincerely,



Dr JWC Acacia MBBS FRACGP  
134 East Nannup Rd, Nannup  
[josh@acacia.email](mailto:josh@acacia.email)  
0430 934 327

To: Shire of Nannup

From: Department of Water and Environmental Regulation

Att: Erin Gower

Dear Erin,

**A1872, Lot 43 East Nannup Road, East Nannup, Development Application - Proposed Nature Based Accommodation Park (DWER Ref: REQ-0001057) DWER Response**

Please note, the advice below has been drafted for the Shire of Nannup in response to the referral. As such, the advice and commentary provided below are not intended for distribution directly to the proponent unless discussed and agreed upon by the undersigned. This advice is based on a desktop analysis of the information and the documentation provided in the referral. A site visit has not been undertaken.

The Department understands the development application relates to the establishment of a nature-based accommodation park at the subject location. The proposal consists of mixed permanent (serviced) and temporary (non-serviced) accommodation options for short term stays that enables visitors to have a greater appreciation of the environment and enjoy the company of the visitors around them. The subject property is located adjacent the Shire's recently completed mountain bike park and aims to service mountain bike and other nature-based enthusiasts during normal and peak times (events).

It is evident from the information provided in the referral that clearing of native vegetation is not expected or required to support development.

As a composting toilet is proposed for Stage 2 of the development, and therefore discharge / irrigation of wastewater to land or waterway is unlikely, DWER defers sewerage advice to the Shire's Environmental Health Officer (EHO) and/or the Department of Health.

The Department does not object to the proposal, however we have identified it has the potential for impact on environment and/or water resource values and/or management. Key issues and recommendations are provided below, and these matters should be addressed:

1. Issue: Water Supply

Advice: The following condition is recommended to be applied:

The proponent is to quantify their water requirements for all aspects of the proposed accommodation park and provide evidence of a secure water source, to the satisfaction of the Shire.

Advice: The following advice note is recommended to be applied:

The property hosts the Carlotta Brook, a proclaimed Surface Water Resource in the Lower Blackwood Surface Water Surface Water Management Area. Any use (taking or diversion) of surface water in this proclaimed area (whether by direct pumping, construction of a dam, or excavation) may be subject to licensing. Any interference of the watercourse (such as the construction of a dam or crossing, or excavation of the watercourse) may require a *permit to interfere with the bed or banks* from the department. Exemptions from regulation can be sought from the department related to the presence of any springs at the head of a watercourse rising on the property.

More detail pertaining to the above issues and additional advice are provided in the table below.

Item No.	Reviewer comment/advice
1.	<p><b>Issue:</b> Water Supply</p> <p><b>Advice:</b> The following condition is recommended to be applied:</p> <p>The proponent is to quantify their water requirements for all aspects of the proposed accommodation park and provide evidence of a secure water source, to the satisfaction of the Shire.</p>

**Advice:** The following advice note is recommended to be applied:

The property hosts the Carlotta Brook, a proclaimed Surface Water Resource in the Lower Blackwood Surface Water Surface Water Management Area. Any use (taking or diversion) of surface water in this proclaimed area (whether by direct pumping, construction of a dam, or excavation) may be subject to licensing. Any interference of the watercourse (such as the construction of a dam or crossing, or excavation of the watercourse) may require a *permit to interfere with the bed or banks* from the department. Exemptions from regulation can be sought from the department related to the presence of any springs at the head of a watercourse rising on the property.

Please contact the Department's Water Licensing staff in Busselton at [busselton.admin@dwer.wa.gov.au](mailto:busselton.admin@dwer.wa.gov.au) or 9781 0111 to discuss further.

Where the Department has a statutory role, planning applications should be considered and approved, prior to the Department assessing any relevant permits, licenses, and/or approvals.

**Discussion:**

A mains water supply service is not available to the subject Lot.

The Department notes a potential water supply from rainwater, third party supply (carting) and/or 'property dams' to support development of the proposal. An omission of the development application is the existence and location of the 'large on farm dam', which is not identifiable from existing imagery or maps provided, and the anticipated demand volumes required to service accommodation and emergency supply (fire).

In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable assessment.

Should you require any further information or clarity on the comments provided please contact me.

Kind Regards,

**Andrew Cresswell**

Senior Natural Resource Management Officer  
Planning Advice South West Region  
Statewide Delivery - Approvals

**Working 9am to 3pm Monday to Friday.**

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Dr Graham and Mrs Sherril McMahon  
256 East Nannup Road  
East Nannup WA 6275

### **Response to “Development Application – Lot 45 East Nannup Road, East Nannup – Proposed Nature-Based Park”**

The proposed caravan park would provide short-term accommodation for visitors. However, the proposal is vague in several significant areas and is not acceptable.

#### **1 Noise Management**

Loud noise (i.e. after-hours music) is not compatible with the concept of a nature-based park, particularly a park that promotes a reconnection to nature, agriculture, and respect for the environment. The suggested curfew implies that loud noises are expected, which is unacceptable for neighbouring properties. The extension of the curfew for “special event nights” is both vague and unacceptable. How have the proprietors defined a special event night? How many special event nights are proposed throughout the year? The proposal alludes to screening to reduce noise. It should be noted that during the annual Nannup Music Festival, music from the Nannup townsite can be heard in East Nannup. Screening will have negligible effect on shielding neighbours from locally generated “loud noise”. The business proposal states there will be a ban on generators. It should also include a ban on any loud noise after normal working hours.

#### **2 Visual Impact**

The proposal states that there will be caravans on site for accommodation. It states that there will be forty self-contained sites, so there is an assumption of forty caravans. These have been described in the proposal as vintage, which conjures up an image of quaint, picturesque units. However, with regards to wheeled vehicles the MacQuarie Dictionary defines vintage as “built between 1918 and 1930”. I find it highly unlikely that the proprietors would be able to obtain forty such caravans, each capable of accommodating six people, within Western Australia. In my opinion “vintage” has been used to describe a conglomeration of old caravans of mixed, and dubious, appearance. This would tend to resemble a scrapyard on the hill, significantly impacting the scenery and negatively impacting the lifestyle of neighbours, and the natural environment which is supposed to be enhanced.

The proposed “noise reducing” screening is not well described. Would it be constructed with trees and bushes in keeping with enhancing the environment? Would it be an artificial structure similar to that along Perth’s major freeway system? The difference in visual impact between these two is self-evident.

#### **3 Traffic**

Forty sites implies that, when operating at capacity, there will be significantly increased traffic on East Nannup Road. Most family vehicles do not readily seat six people; therefore, many sites will be associated with two vehicles. These would not be stationary; they would be used to visit Nannup and its surrounding attractions, all via East Nannup Road. It should be remembered that East Nannup Road is also part of the Munda Biddi bike trail, the Warren Blackwood Stock Route (bridle trail), and is signposted as a dog-walking route. The proposal describes traffic management on the property but completely ignores the effects of increased

traffic on the road frequented by cyclists, horses, and pedestrians. The effects should be examined and addressed in detail before the proposal could be considered acceptable.

#### **4 Management**

The proposal states that management will be predominantly offsite. This is not acceptable. It is simply not possible for management to control adherence to noise levels and general behaviour unless present. Neither could management respond in a timely manner to any complaints that may arise. Furthermore, should there be a need to evacuate the premises, this could not be achieved through offsite management. Two hundred and forty visitors to the area would require direct, proficient control. The premises should be managed onsite, 24/7, by competent adult supervision.

#### **5 Conflict of Interest**

Local Government Operational Guidelines state "... a 'conflict of interest' can occur when the responsibilities of a council member or employee conflicts with their personal interests" (<https://www.cits.wa.gov.au/department/publications/publication/disclosures-of-interest>). The proposal was submitted by Ms Emmi Taylor. Ms Taylor is the partner of Mr David Taylor, the current Chief Executive Officer of the Nannup Shire Council, and it is this Council that will determine the acceptance or rejection of the proposal. It is clear that a conflict of interest exists, yet this has not been disclosed in the proposal.

#### **Summary**

In its present form the proposal is unacceptable. Any new proposal should include a:

1. statement that no loud noise will be permitted after normal working hours.
2. better description of the onsite accommodation, and its position with respect to the neighbouring vista.
3. detailed analysis of the increased traffic movement on East Nannup Road.
4. statement that the property will be managed onsite, 24/7.
5. full disclosure of all matters relating to the conflict of interest.

6.

Any new proposal will need to be recirculated in its entirety for further input.



Dr Graham McMahon BSc(Biol), GradDipEd(ScEd, CompEd), MEd(ScEd), GradCertEd(TESOL), GradCertSecEd(Maths), PhD(CompEd)

Ph 0421 423 006



Mrs Sherril McMahon RN, CertIVTAE, DipTeach, GradCertEmNurse

To: The Shire of Nannup  
Planning Department & Councillors

Greg Crothers  
134 East Nannup Rd  
1 September 2025

**Re: Development Application**

**Ref A1872**

**– Ikigai Farm “Nature-Based Park”, Lot 43 East Nannup Road –**

I am a neighbouring landholder to Lot 43 and wish to formally object to **Stage 1 and 2** of the above proposal on the following grounds:

## 1. Stage 1 Misclassification

Stage 1 proposes **40 self-contained sites** in cleared paddocks. The property (Lot 43) is **predominantly improved pasture**, with only minor natural vegetation along Nannup Brook and scattered trees.

Under the **Caravan Parks and Camping Grounds Regulations 1997**, a *nature-based park* is intended to be:

- located in a **natural setting**,
- with sites positioned to **avoid environmental and visual impacts**, and
- With a **low level infrastructure and site density**

Under the Nannup Shire policy **LPS4** rural tourism developments should

- **Not detract from rural character**
- **Avoid ridge lines and visually exposed sites**
- Be of a **scale and nature to be self sustaining**
- Have **minimal impact** on site and surroundings

The Stage 1 proposal does not meet this intent:

- **Setting** – camping areas are located in cleared farmland, not within intact natural bushland.
- **Site-** camping area is on a ridge clearly visible from the East Nannup Road and surrounding properties. No **visual amenity assessment** is provided
- **Site density** – 40 clustered sites ( $\approx 240$  guests) on about 1 ha resembles a caravan park / camping ground rather than a dispersed, low-key nature camp.
- **Infrastructure** – even in Stage 1, vintage caravans, communal areas and firepits demonstrate a managed campground, not a low-impact nature retreat.

In practice, Stage 1 is **functionally a caravan/camping ground in farmland**, but labelled as a “nature-based park” to lower the level of regulatory scrutiny.

## 2. Boundary Setback – Only 6 Metres

The proposed **6 m setback** from property boundaries is inadequate.

- **Farming conflict** – I actively crop the adjoining land for hay, using fertilisers, herbicides and pesticides. Tourists only 6 m away are directly exposed to spray drift, dust, and noise from machinery. This creates a **reverse sensitivity problem** where my lawful farming risks being constrained by tourist complaints.
- **Amenity loss** – noise, lighting, dust and campfire smoke will spill directly onto neighbouring land.
- **Bushfire risk** – 6 m setbacks fall well short of the standard setback for this type of development and does not provide defendable space in a declared bushfire-prone landscape.

LPP-9 requires Council to consider **existing land uses of adjoining properties** and the **proximity to sources of nuisance**. A 6 m setback fails that test.

### 3. Bushfire & Evacuation Risks

Lot 43 in East Nannup Rd is a declared **bushfire-prone area**. State Planning Policy 3.7 requires a **Bushfire Management Plan** for any tourism development.

The proposal states that all sites are “outside bushfire-prone buffer zones” but provides **no certified Bushfire Attack Level (BAL) assessment** or evacuation plan.

Key risks:

- **Patron numbers** – Stage 1 could host up to **240 people**.
- **Limited evacuation** – access relies on one gravel driveway. Alternative “exits” mentioned in the plan include Lindsay Road into mature pine plantation. It should be noted that Lindsay road is closed on the northern (town) end. Guests exiting via this road risk turning towards locked gates or a more hazardous situation on unfamiliar gravel tracks.
- Using a neighbour’s property *if permission is granted* — this is speculative and unreliable.
- **On-site protection** – Bushfire risk management plan is not provided.
- **Remote management** – with no onsite caretaker this proposal relies on guests and neighbours to report and provide initial response to incidents. Experience from other campgrounds show campers are generally reluctant to report breaches of camp rules.

This fails statutory minimum requirements of SPP 3.7 or DFES guidelines, exposing guests and neighbours to unacceptable risk.

### 4. Sanitation & Wastewater Risks (Stage 1)

Stage 1 assumes all patrons will be **fully self-contained** and will remove wastewater and effluent from the property.

This is not credible for 40 sites over extended stays:

- **Enforcement is impossible** – the manager is based 4 km away and cannot practically verify that every guest removes waste. CCTV is only effective in daylight hours and continuous monitoring is unlikely.

- **Greywater leakage** – experience from other campgrounds shows that some campers discharge waste on-site. This risks contamination of soil, watercourses, and neighbouring land.
- **Public health non-compliance** – WA Department of Health guidelines require effluent management systems proportionate to patron numbers. For 240 people, proper facilities are mandatory, not optional.

Stage 1 therefore presents a **serious sanitation and environmental risk**.

## 5. Inconsistency with LPP-9 Objectives

LPP-9's purpose is to encourage tourism while **protecting rural character and primary production**.

This application does the opposite:

- Introduces a dense campground into a farming precinct.
- Misuses the “nature-based park” label to avoid caravan park standards.
- Provides servicing and management arrangements far below the level required for the proposed intensity.

## 6. Road Pressures and Safety Risks

The entrance/exit to Lot 43 is at the bottom of a **steep hill with a sharp bend and limited visibility**. The combination of a 110 km/h default speed limit, road train use, and increased tourist traffic presents a documented safety hazard and fails to meet basic traffic engineering safety standards for tourist access.

**LLP9** section 5 does not support short term accommodation where there is a **potential for traffic generation to cause undesirable nuisance or safety issues**.

Adding 80–100 vehicle movements a day (including caravans and trailers) is a significant increase in present traffic volume for East Nannup Rd and creates a high likelihood of conflict and accidents.

## 7. Governance, Conflict of Interest & Enforcement Risks

The applicant is the **spouse of the Shire CEO**. Under the **Local Government Act 1995**, this creates a **direct financial interest** for the CEO.

Public confidence in local government depends not just on following the rules but also on **avoiding the appearance of favouritism or misuse of position**.

Implications:

- The CEO must **not participate** in assessment, reporting or decision-making.
- If approved, the CEO cannot be involved in **enforcement** of licence conditions (noise, waste, bushfire compliance).

Without clear independent enforcement arrangements, the community cannot have confidence that licence conditions will be monitored or applied impartially.

## 8. Stage 2 as an Aggravating Factor

While this objection is directed at **Stage 1**, references to **Stage 2** only make concerns worse.

Adding ablutions, serviced sites, laundry and kitchen facilities will:

- intensify patron numbers and activity,
- increase wastewater generation and treatment risks,
- further increase noise and traffic

Rather than mitigating Stage 1 flaws, Stage 2 **aggravates them**.

## Request

On the basis of the above, I respectfully request that Council:

1. **Reject Stage 1 and 2 of the proposal** on the grounds of misclassification, inadequate setbacks, farming conflicts, bushfire risk, sanitation risks, road safety and governance concerns.
2. Recognise that **Stage 2 aggravates** these issues rather than resolving them.
3. Ensure the application is assessed with **independent planning advice** and that **conflict-of-interest protocols** are transparently applied.

## Closing Statement

I support sustainable and well-planned tourism for Nannup. However, Stage 1 of this proposal introduces a high-density campground on farmland with inadequate setbacks, poor access and emergency exits, unenforceable waste management, and compromised governance. It does not align with Nature Based Parks Licensing Guidelines, Caravan and Camping Grounds Act 1997, LPP-9, LPS-4, State Planning Policy 3.7, or the community's expectations of fair process.

I therefore urge Council to reject Stage 1 and 2 of the Ikigai Farm proposal.

Yours sincerely,

Greg Crothers.

134 East Nannup Rd  
Neighbouring Landholder to Lot 43

Erin Gower

Development Services Officer

Nannup Shire Council

PO Box 11

Nannup WA 6275

Cc:

Shire President Cr Tony Dean CEO,

Cr Cheryle Brown      Cr Patricia Fraser

Cr Ian Gibb

Cr Timothy Sly      Cr Lynette Curtis

Cr Vicki Hansen

## **DEVELOPMENT APPLICATION – Lot 43 EAST NANNUP ROAD, NANNUP**

### **PROPOSED NATURE BASED PARK**

I support sustainable and well planned developments for the Nannup area but I disagree when the development proposal impacts in a negative way to lifestyle and assets. I am a resident and landholder on East Nannup Road and wish to object to Stage 1 and 2 of the abovementioned proposal on the following grounds;

- a) The entrance to Lot 43 East Nannup Road is at the bottom of a steep hill with a sharp bend and limited visibility. The combination of a 110km/h default speed limit, road train use, bicycle traffic and increased tourist traffic, of which the majority could be towing, presents a high safety hazard for all concerned. Adding increased vehicle movement's a day creates a high likelihood of conflict and accidents. This road is not designed for tourist traffic volumes. This identifies as a safety risk for all concerned, both tourists and the residents of East Nannup Road.
- b) Any increase in vehicle movement on East Nannup Road will directly impact my quality of life and more than likely the valuation of our property. We chose to live here for the tranquil lifestyle. Increase in traffic volumes and noise does nothing to assist my choice of lifestyle. East Nannup Road has a high frequency of walkers, bike riders, dog walkers, wildlife and joggers. Any increase in traffic volume along this particular road is a high safety risk for all users. Anyone that travels this road are aware of the dangers involved on this road mid to late afternoon when you are blinded by the sun which obviously creates an immediate safety hazard for all users.
- c) Nannup Brook runs though our property. I am very concerned of the risk involved with spillage and contamination of this waterway. There is nothing in place in this development proposal to stop any camper discharging waste direct onto the ground. A detailed waste management plan should be detailed in both Stages 1 and 2 of this proposal. Again, no on site management, how is this going to be controlled if there are no direct checks in place.
- d) There is no detailed fire safety plan. It does detail that there will be a firefighting unit on site for rapid response BUT the site does not have on site management. The question remains how rapid would this response be if there is no on site management to operate a fire fighting unit. Campers and tourist alike would not be aware of the Shire fire regs and we are all well aware that the majority by far of campers, have outside kitchens which generates energy of some sort.

- e) Any noise management plan cannot be implemented if the park does not have on site management. While accepting (and appreciating) no motor generators and the like, a curfew of 10pm and possibly midnight is not acceptable. While not wanting to sound like a 'karen', East Nannup Road is located in a 'gully' and noise travels further and is louder within this sort of environment. Ultimately there will be no one on the site of the development to ensure (or enforce) the noise management statement as detailed within the proposal. Screen management as detailed within proposal should have further detail and be included within Stage One development. Screening must assist with both visual and audible pollution while not increasing the fire hazard risk.
- f) The developer should be contributing towards the additional upkeep/maintenance of Lindsay Road to ensure it is actually usable for vehicles and whatever they are towing, as it has been named as an evacuation route. The ratepayers of the Nannup Shire Council should not have to bare this cost.

Regards

*Jenny Styles*

43 East Nannup Road

Nannup WA 6275

Mob. 0429 661328

Email: [jstyleszy@gmail.com](mailto:jstyleszy@gmail.com)

To Shire of Nannup Planning Department,

RE: Development Application for Ikigai Farm Nature Camp

Lot 43 East Nannup Road.

Like my neighbours I wish to object to stage 1 and 2 of your proposal.

I understand there is a need to accommodate visitors but not to the detriment of locals.

The entrance is at the bottom of a hill on a sharp bend and impacts tiger Cottages driveway and turning point.

Traffic

Bikes, cars, caravans, trucks, children and dog walkers trying to get to town without a path over the bridge.

Fire Hazard

Greg Crothers has been a full-time fire fighter most of his life and knows the hazards and has already explained the hazards better than I can.

Noise & light

I don't believe for a moment the noise can be controlled. We live in a valley that acts as an amphitheatre. Noise carries and lights and generators up on a hill impacts locals and animals wind and domestic.

Brook

Are you going to be responsible for all the grey water being removed from the site, kitchens, laundries, showers and toilets? Who will monitor the removal and where will you take it?

Nature Camp

What does that mean – no license for a camping area? Any camping area in Nannup could be considered a nature camp.

Regenerative land use, native vegetation and soil health improvements all run by a camera from your home that sees in the dark and can have sound so you don't need a site manager – REALLY!

Yours sincerely

Kerri Firth

27 East Nannup Road

Dr Margarita Betancor  
134 East Nannup Rd

**To:** The Shire of Nannup's Planning Unit – Erin Gower, Development Services Officer  
**Ref:** A 1872  
**Re:** **Objection Development Application to proposed “Nature-Based Park”, Lot 43 East Nannup Road, East Nannup (Ikigai Farm)**

## Executive Summary- Key concerns

I am a neighbour to Lot 43 and wish to **strongly object** to the above proposal. My concerns fall into eight critical areas that, individually and collectively, make the application unsuitable for approval:

1. **Conflict of Interest** – The landowner is the Nannup Shire CEO and the applicant is his spouse. This raises serious perception issues, as Council approval could appear biased and compromise public confidence. An independent external assessment and enforcement are recommended to safeguard public trust, ensure transparency, and protect the Shire from reputational or governance risk.
2. **Misclassification** – The proposal is effectively a caravan park on farmland, not a low-density nature-based park as defined in legislation.
3. **Unclear Capacity** – Site numbers are vague, allowing expansion up to 600 guests without proper assessment.
4. **Impact on Mobile Networks** – High guest numbers risk congesting the local tower, jeopardising residents' ability to make emergency calls. Without a detailed technical plan and enforceable conditions, the proposal risks seriously degrading local mobile coverage and undermining public safety.
5. **Bushfire & Evacuation** – No certified Bushfire Management Plan is provided; evacuation is unsafe for potentially 240–600 people.
6. **Sanitation & Wastewater** – Reliance on “self-contained” visitors is unenforceable and contrary to Department of Health requirements. Approving without enforceable sanitation systems creates a foreseeable public health problem.
7. **Absence of On-Site Management** – No on-site manager is proposed, making safety, compliance, and emergency response impossible. The Caravan Parks and Camping Grounds Regulations 1997 require physical day-to-day presence for a facility of this scale.
8. **Stage 2 Escalation** – Proposed kitchen, events, and expanded facilities would significantly worsen all identified risks.

## Request

Based on these concerns I respectfully request that Council reject the “Nature-Based Park”, Lot 43 East Nannup Rd (Ikigai Farm) proposal (both Stage 1 and Stage 2) in its entirety.

Sincerely,

1.September 2025

Dr. Margarita Betancor DAppSc(Phys)  
134 East Nannup Rd  
Neighbouring Landholder to Lot 43

## Detailed Objection

### 1. Conflict of Interest and Public Trust

**Lot 43 is owned by the Nannup Shire CEO**, David Dean Geoffrey Taylor, and the **applicant is his wife**, Emmi Lee Taylor.

While the application is made by a private individual, the fact that the landowner is the Shire CEO creates a situation where Council's impartiality could reasonably be questioned. Even if no legal conflict exists, approving a development directly benefiting the CEO's family may erode public confidence in the planning process.

Unlike elected councilors, who are accountable to the community via the ballot box, the CEO is a permanent employee with contractual obligations to Council. This means Council could be placed in a difficult position if it must:

- Assess and approve a development **benefiting its own CEO**;
- Enforce conditions or compliance **measures against the CEO** in the event of breaches;
- Respond to complaints or appeals where its **independence could be questioned**.

Independent external assessment and enforcement are recommended to safeguard public trust, ensure transparency, and protect the Shire from reputational or governance risk.

### 2. Misclassification of Land Use – Not a Nature-Based Park

The application describes the development as a “nature-based park.” This is incorrect. A nature-based park, under the *Caravan Parks and Camping Grounds Act 1995* and Regulations, is intended for low-impact camping in a natural setting where the dominant attraction is natural features.

**Lot 43 is not a natural reserve or bushland area but predominantly cleared farmland with scattered trees.** The proposed development — campsites, events, ablutions, car parking — is effectively a **caravan park/camping ground in farmland**.

In addition, a “low-density” nature-based park might host only 10–30 campsites across 10–20 hectares of bushland, whereas a typical caravan park might densely arrange 50–100 sites into the same space. The applicant is suggesting to include 40 sites across less than 2 hectares. This is closer to a caravan park, than a nature-based park.

By misclassifying the development, the applicant has avoided the stricter requirements for caravan parks/camping grounds, including minimum ablutions, potable water supply, waste systems, and management standards. This **misclassification** alone is sufficient grounds for refusal.

### 3. Temporary Campsites and Unclear Maximum Capacity

The proposal refers to **reducing campsite size from 100 m<sup>2</sup> to 60 m<sup>2</sup>** under the “temporary campsite” provision. This would allow the operator to significantly increase the number of sites, and therefore the total guest numbers.

- At 150 m<sup>2</sup>, 40 sites could hold ~240 guests.
- At 60 m<sup>2</sup>, the same area could fit 100 sites, potentially hosting **600 or more guests**.

The application does not state a clear maximum number of sites or guests.

"Temporary site" provisions in the Regulations are intended for **short-term event-based approvals**, not to expand permanent campsite numbers.

This **vagueness** makes proper assessment against bushfire evacuation, sanitation, noise, and traffic standards impossible. Council cannot approve a plan that leaves **total occupancy undefined**.

## 4. Potential Impact on Mobile Communications

I am concerned about the impact on mobile phone coverage and service quality in the surrounding area from an additional 240–600 visitors. The critical issue is not simply degraded internet speed, but the risk that **residents and visitors may be unable to make or receive emergency calls** if the local mobile tower is congested.

### Quantified Mobile Usage

- Assuming 50% of campers online simultaneously, ~120-300 users could be drawing on mobile data at peak times.
- Average usage for browsing, messaging, and video/VoIP is ~2 Mbps per user, equating to a demand of 240-600 Mbps on local mobile towers.
- Given the rural location, the nearest tower is highly unlikely to sustain this load without service degradation.

### Risks

- Neighbours and road users may experience dropped calls or failed connections, including during emergencies such as bushfires, medical incidents, or traffic accidents.
- Campers themselves may also be unable to reach emergency services when needed.
- These risks are magnified at night or in high-occupancy periods when quick communication can be life-saving.

### Requirements to Mitigate Mobile Network Impact

To safeguard community safety and ensure reliable service for both residents and visitors, the campsite should be required to:

- **Provide evidence from the carrier** (Telstra/Optus) that the nearest **mobile tower can support the additional call and data demand** from 240-600 extra users without degrading emergency call reliability for the wider community.
- **Develop an emergency communications plan**, including contingencies, if mobile service fails (e.g. satellite phones on-site, UHF radios, or other redundant systems). Mobile service failure has already occurred during the Nannup Music Festival.
- Offload general internet demand by providing a dedicated high-capacity service (e.g. Starlink Business or equivalent) with site-wide Wi-Fi, so guests' entertainment/data usage does not congest the mobile network.

Without an on-site manager, measures such as "educating guests to use Wi-Fi calling" cannot be implemented or enforced, making it unrealistic to rely on this as a safeguard.

Without a **detailed technical plan and enforceable conditions**, the proposal risks seriously degrading local mobile coverage and undermining public safety.

## 5. Bushfire & Evacuation Risks

The proposal seeks **approval** for up to 40+ campsites and future Stage 2 expansion in a **declared bushfire-prone area**. The document mentions a firefighting unit on site available without giving any details about the scale and size.

**No certified Bushfire Management Plan (BMP) or Bushfire Emergency Plan (BEP)** has been provided, contrary to the requirements of *State Planning Policy 3.7 – Planning in Bushfire-Prone Areas*.

**Evacuation is unsafe:**

- The primary access is via the end of a **steep road with a sharp corner and low visibility**, already used daily by a milk tanker.
- The proposed “**back gate**” directs evacuees into a **timber plantation**, itself a major fire risk and not a safe or reliable route to Nannup.
- With potentially well over **240 people onsite** (see Section 3 above), **evacuation** arrangements are **insufficient**.

Council cannot lawfully approve tourist accommodation of this scale in a bushfire-prone area without a certified BMP and BEP demonstrating safe evacuation and compliance with SPP 3.7.

## 6. Sanitation & Wastewater Risks

The proposal assumes Stage 1 campers will be “fully self-contained” and remove their own wastewater. This is unenforceable: visitors may discharge greywater or effluent onsite, creating **health and environmental risks**. No infrastructure is proposed to manage this.

The Department of Health and the *Caravan Parks and Camping Grounds Regulations 1997* require:

- Ablution facilities (toilets, showers, hand basins) for every 10 sites, connected to sewerage or an approved system with hot/cold water.
- Safe potable water for all guests, with treatment/testing if sourced from rainwater.
- Licensed systems for greywater and blackwater disposal - not reliance on visitors.
- Adequate rubbish collection and management oversight to ensure hygiene.

“Self-contained only” is not an acceptable standard for a permanent facility of this scale. Approving without **enforceable sanitation systems** creates a foreseeable public health problem.

## 7. Absence of On-Site Management

The proposal provides for hundreds of people at full capacity but proposes no on-site manager, relying instead on remote CCTV from a house 3 km away.

This is inadequate:

- The *Caravan Parks and Camping Grounds Regulations 1997* require a manager responsible for day-to-day operations. For a facility of this scale, that requires a physical presence.
- Without an on-site manager, rules on **noise, fire use, and waste** cannot be enforced.
- In an emergency — particularly bushfire, medical incidents, or late-night disturbances — there would be no trained person to coordinate evacuation, assist guests, or liaise with emergency services. Remote CCTV monitoring, especially at night, cannot provide an effective or immediate response.

**Without on-site management**, none of the proposal’s claimed safeguards are credible.

## 8. Stage 2 Aggravates All Risks

The applicant seeks approval not only for Stage 1 but also for **Stage 2**, which includes:

- communal ablution blocks,
- kitchen and food service,
- special event nights with noise extensions, and

- increased patron numbers.

Stage 2 would:

- greatly increase **water demand** and **wastewater generation**,
- intensify **noise and amenity impacts** on neighbours,
- introduce new **fire risks** from kitchens and larger gatherings, and
- make evacuation of even greater numbers impossible via the unsafe access points.

Stage 2 is not a minor extension — it is a substantial escalation in scale and impact. Approving both stages together would compound all the problems identified above and lock Council into an unmanageable situation.

## Request

On the basis of these eight **critical issues** — **governance conflict, bushfire risk, sanitation risk, absence of on-site management, misclassification of land use, potential mobile calls issues, unclear capacity, and Stage 2 escalation** — I respectfully request that Council carefully consider **rejecting the “Nature-Based Park”, Lot43 (Ikigai Farm) proposal in its entirety (Stage 1 and Stage 2)**.

Approving tourist accommodation on the CEO’s own land, without a Bushfire Management Plan, enforceable waste management, on-site management, or independent oversight, would expose the Shire to significant reputational and legal risk.

I wish to emphasise that my objection is **not against tourism or small businesses in Nannup**. I spend half of the year in Nannup supporting a farm pro bono since 2016 and fully support local enterprises that operate responsibly, sustainably, and in compliance with regulations. My concern is specifically with this proposal’s scale, management, and potential risks, which could adversely affect neighbours, the community, and essential infrastructure. I remain committed to supporting tourism initiatives that are safe, well-managed, and aligned with the Shire’s planning and environmental standards.

Yours sincerely,

1.September 2025

Dr. Margarita Betancor DAppSc(Phys)  
134 East Nannup Rd  
Neighbouring Landholder to Lot 43

**Response to “Development Application – Lot 45 East Nannup Road, East Nannup – Proposed Nature Based Park”**

SHIRE OF NANNUP RECEIVED Ref: A372	01 SEP 2025
Officer: ERIN	

**Attention: Erin Gower – Development Services Officer Shire of Nannup**

This letter formally raises concerns about the application above, noting that the current proposal is too vague and therefore unacceptable.

**1. Legislative Requirements**

The proposed nature park will need to address several legislative requirements, namely,

- Caravan Parks and Camping Ground act 1995
- Caravan Park and Camping Ground Regulations 1995
- Land Administration Act 1997
- Planning and Development act 2005
- Health Act 1911
- Building Act 2011 and Code
- Relevant local laws

It is not clear within the business management plan whether these have been specifically addressed and or fully complied with.

**2. Nature Park or Caravan Park**

The proposed park encompasses approximately 40 designated sites, each configured to accommodate up to six individuals using caravans or self-contained lodging options. There is no detail how the proposed park will manage and operate animal production, specifically how many and what type, and more importantly it will need to be managed full time. It would appear this is more about a commercial income generator providing accommodation for events rather than being a true nature-based park.

**3. Visual Impact**

The installation of some forty (40) “vintage” style caravans is questionable as such models from a vintage era would not be able to accommodate six (6) people. It is more likely that vintage is a mixed bag of old caravans of diverse types and shapes which would resemble an old caravan scrap yard at its best. This would not be acceptable and would have a significant impact visually for neighbours and would have a negative overall impact and in no way enhance the natural environment. Similar during major events with some 240 people and their vehicles parked on the hill this is not aesthetically acceptable to existing neighbours who respect and enjoy the vista they

have. The advertisement for the facility, specifically signage externally will also have a negative visual effect on the current environment. No doubt it will attract an increase in the number of traffic signs along East Nannup Road, including pedestrians' signs, cyclists and traffic signs, revised speed limits etc. which is visual pollution and not in keeping with the current aesthetics of the environment.

#### **4. Noise Management**

Noise pollution from people, vehicles, and after-hours music is not compatible with a nature-based park. Many neighbours value and want to preserve the area's tranquillity. The management and control of the above is vague at best and more importantly the screening off to control noise (and visual impact for that matter) will have limited effect for neighbours. Extending curfew for unique/special events is unacceptable to nearby residents. If the park was to run at full capacity with an excess of 40 vehicles entering and leaving the property this would create a noise issue for residents along the road.

#### **5. Traffic Safety and Control**

Currently East Nannup Road experiences a noticeably quiet footprint in terms of the amount of vehicular, cyclist and pedestrian traffic and associated noise. To propose 240 people would also suggest a minimum of 40 plus vehicles. This would necessitate a review of the current road conditions, speed limits, traffic control and general pedestrian and cyclist safety. This would not be acceptable as many residents enjoy walking along our road, riding their horses and cycling without having to concern ourselves with vehicular risks. To have these sorts of proposed numbers of vehicles, a probable increase in bikes and associated back-up service vehicles using the road is not acceptable. And would essentially be on long weekends and holidays, a quiet time for our residents along the road. At night, the movement of vehicles in and out will produce excessive light pollution for many residents along and opposite the road and is not enhancing the environment. It would be reasonable to expect an increase in the number of road kills along the East Nannup Road with the sort of numbers of vehicles. This is not in line with the environmental objectives.

#### **6. Management of the Facility**

The proposal that there will be no management on site with the responsibility of the proposed numbers of people and vehicles is not acceptable and irresponsible at best. Including the fact that should there be noise issues, altercations and general problems associated with managing such a facility, general complaints, etc. Remote management of such a proposed park is unacceptable. The management of animals would also require some professional conduct and require someone on site.

Similarly what responsibility is taken in the event of an emergency requiring evacuation of the facility and the safety of the people. Residents are unlikely to take their rubbish

home. We will have rubbish strewn along East Nannup Road and as such who will clean this up.

## **7. Fire Management**

Crowded areas, outdoor fires, barbecues, heaters, and car park fires pose significant risks to both the environment and nearby residents. As such there would need to be a risk assessment undertaken and accepted by the local laws as well as the WA Fire services.

## **8. Conclusion**

The current proposal for the nature-based park is unacceptable and does not take into consideration the fact that long term residents enjoy a quiet livelihood along our road and do not see the need for a commercial venture of this sort in an environment deemed rural.

A handwritten signature in black ink, appearing to read "Neil J Wilson".

**Nannup Resident**

**PH: 0437654662**

**Seraphim Retreat**

253 East Nannup Road, East Nannup, WA

*e-mail to: seraphimretreat@gmail.com*

Erin Gower

Development Services Officer

Shire of Nannup

By e-mail to: [nannup@nannup.wa.gov.au](mailto:nannup@nannup.wa.gov.au)

10 August 2025

Dear Erin

Thank you for your letter attaching the DA for proposed Ikagai Farm Nature Camp.

Based on the information contained in the application, we are not in favour of the application in its current form, and have concerns about it in principle.

We operate a short stay business from our house. We plan to retire to it within a few years. We therefore have a significant stake in this matter both commercially and personally.

**1. Oversupply**

We are of course in favour of the development of tourism in Nannup as an ancillary source of growth to its historic core industries. However, as successful operators of three short stay businesses in three separate locations, we can, by comparing them, attest to the current oversupply of tourist accommodation in Nannup. The site borders two modest accommodation businesses with modest income and significant vacancies. Many in our industry have found business has declined in Nannup in the past 5 years (albeit overall activity is up, it is not diluted by multiple options). We are concerned that the expansion of facilities to “cash in” on the forthcoming gravel race will be the small-town equivalent of the oversupply which cities feel after the Olympics. The addition of a further 240 beds without any new attractions to draw more guests in could be devastating. We do not consider the development in itself an attraction; on the contrary, we consider the traffic impact of the development to involve the degradation of existing tourist attractions in the form of cycle and other trail routes.

**2. Traffic – amenity, business and broader commercial impact**

The site will accommodate 240 guests with more for special events, but we would anticipate this will be exceeded. Based on an estimate of two vehicles per site, and three trips out per day in addition to arrivals and departures, we are confident a traffic study would forecast a minimum of 3 trips x 2 arrivals and departures x two cars x 40

sites= 480 additional journeys in peak season. This section of road currently sees fewer than 50 vehicles a day (figure derived from camera activations on our driveway).

This has several implications:

- Material and substantive change in character and amenity.
- Significant impact on existing smaller accommodation businesses nearby which are marketed as tranquil or rely on cyclists (see below).
- A complete change in the character of the road, which is on the Munda Biddi, Gold Gully Loop and Warren-Blackwood Stock Routes. We see as many bikes as cars at the moment and half our guests are cyclists who tell us how wonderfully quiet the road is. This major increase in traffic destroys that amenity. We understand that proposed increases in housing density closer to town may in future have this effect, but this is a different location altogether.
- The traffic generated by an evacuation in the event of fire would be a real hazard for those of us further up the road (see 3 below).

### **3. Fire safety**

As a volunteer firefighter myself I would not want to defend this development. Adjoining pastures are grazed and therefore have unslashed grasses well into fire season. The development itself brings with it a large increase in ignition risk, notwithstanding standard mitigation measures, which in turn increases fire risk to neighbours.

The development appears to have evacuation plans via a single road over a new bridge on the Brook. We do not agree that the Lindsay Road exit is a safe and reliable alternative, both by its nature and quality and the fact it effectively leads back to E Nannup Road. I would not want to be in a heavy fire appliance coming up the track while 80 cars come the other way. Realistically, we feel they would all use the main track. We also refer to our comments on evacuation traffic. The bottleneck of cars turning right, or even left, out of here in an evacuation is really concerning.

### **4. Location**

The development is proposed close to neighbours, presumably because this is the cheapest location. It appears concentrated. This has consequences for amenity and our business. There is plenty more land on the 150 acres to locate it more sensitively, albeit at greater cost.

### **5. Management**

We strongly object to the lack of permanent on-site management. We would like this to be a condition of the DA for the developer and all successors. The detail in the proposal assumes this will always be owned and operated by one family. On-site professional management is needed to monitor noise, compliance with max guest numbers, fire safe behaviour and respond immediately. It should not be our job to call the manager and await response. From our own experience, we know that business plans envisaging attracting a particular demographic are no indication of who will ultimately book.

### **6. Interim plan**

We assume the Stage 1 application is designed to coincide with the gravel race. While stage two might be acceptable with modifications, we object to Stage 1 in its entirety.

- Vintage caravans is a synonym for old caravans.

- We have no confidence in the quality or management of this interim plan without further details.

## 7. Curfew/Noise

We would prefer, given the numbers of guests, that no music was ever played. We trust dogs will not be permitted to abate barking given the number of sites. In any event, a curfew of 10pm, given the numbers, if too late from the point of view of us and our guests and we strongly object to a later time for events. We feel these times are only suitable for accommodation for a couple of families. We also refer to the Management concerns on enforcement. I own a house in the Perth Hills which is often disturbed by music from rural properties on a hillside 2 km away. The way that noise travels in the valley is unpredictable and often surprising, and we do not have confidence in screening as a solution. Once we know how the noise impacts us, it will be too late.

We would like to reiterate our support for the planned sensitive development of tourism in the Shire, and our general support for small business and rural diversification. We are happy to consider the applicant's responses to the above points and mean no offence. We would gladly discuss our concerns with them. It could be we have misunderstood their proposals. We know that they have spoken to our neighbours, and may not have our contact details and are happy for you to share them.

Kind regards

*Jake & Leena*

Jacob Kilcoyne-Betts MA (Oxon), Solicitor (E&W, Retd), PgDL, DipEd, CTEFLA

Dr Harleen Uppal MD, MRCGP, FRACGP, DCH, CSCM

Mrs. Suzanne de Beer

P.O. Box 97, East Nannup, WA 6275

[suzannedebeer@bigpond.com](mailto:suzannedebeer@bigpond.com)

041 087 8998

September 11, 2025

Erin Gower

Development Services Officer

Shire of Nannup

15 Adam Street, P.O. Box 11

Nannup, WA 6275

Re: Objection to the Proposed Development of IKIGAI FARM Nature Camp at Lot 43, East Nannup.  
Application Reference Number A1872

Dear Ms. Gower and the Nannup Shire Council

I am writing as a shire resident and owner of Nannup Tiger Cottages, a cherished local business that has contributed to the economic and cultural fabric of our rural valley in Western Australia for over 30 years. It is with deep concern and a profound sense of responsibility to our community that I formally object to the proposed development, IKIGAI FARM “Nature Camp,” reference Number A1872, in its current form. This project, if approved, would irreparably harm the unique rural character of our valley, compromise public safety, and undermine the livelihoods of established local guest services, such as ours. I urge the Shire Council to reject this application in its current form, prioritizing the long-term well-being of residents, visitors, and our environment over short-sighted commercial interests. I also request to be part of a consultation process in order to find a way forward towards the benefit of our small farm stay business, our East Nannup road residents, the proposed developers as well as the greater Nannup Community. In this regard I commend the applicants of the proposed development for having discussed this with us personally prior to lodging their application. We shared that we would not oppose the development once our concerns were resolved. In its current form however, the proposal has changed from what was originally shared with us, so our concerns remain and in fact have grown, as noted below.

- A. Our valley has long been defined by its serene, rural character—a peaceful haven of rolling farmlands, native bushland, and quiet country roads that attract visitors seeking respite from urban chaos. This development threatens to erode this essence by introducing an incompatible influx of transient

activity, transforming our idyllic landscape into a commercialized camping and recreational zone. The preservation of this rural identity is not merely nostalgic; it is the foundation of our valley's appeal and economic sustainability. Allowing such a project would set a dangerous precedent, paving the way for further commercial developments that could forever alter the valley's charm and deter the eco-tourists and families who sustain farm stays like ours. A smaller number of sites more in line with what we were originally approached with, would allow the development to still offer sufficient sites to accommodate Nannup's growing tourism requirements without negatively impacting existing small business. We understand that there is a scramble towards accommodating large numbers of people for the 2026 UCI Gravel series but after that finishes, the impact of approving this size development will only erode away business from existing small business owners. Considering other caravan site approvals in the recent past, we believe approving this size development would undermine the sustainability of the current Nannup hospitality industry.

B. Compounding this threat is the inevitable noise pollution from excess vehicles, caravans, and campers. The development's design anticipates a higher-than-normal volume of traffic and incoming groups of campers, generating endless disturbances through engine noise, amplified music, and late-night gatherings. In a valley where silence is a prized commodity, this would disrupt the tranquility that defines our area, affecting not only the residents' quality of life but also the livelihood of current small businesses like ours, who's guests come for a quiet farm stay experience. When guests choose to book a farm stay with us, they expect to hear the babble of the Nannup brook, the lowing of cattle and the twitter of our diverse local bird life. What they do not expect to hear is the inevitable partying, engine noise, people chatter and loud music that follows large crowds. The proposal's curfew of 10:00 pm (extended to midnight for planned events) is woefully insufficient to mitigate these issues, particularly with large numbers of people congregating in such close proximity to our property, beginning with a setback of a mere 6 meters from our northwestern property line. From experience with the cattle currently kept in the area of the proposed development, I can verify that the sound travels extremely well. Some nights we get woken up by bellowing cows. This is a cost our guests expect to pay when they book a farm stay. Having city type ruckus follow them here is however a different matter and one to which a solution has to be found. We appreciate the proposed screening in order to mitigate noise levels, but request detail of what this proposed screening would be. Only a solid screen or densely planted mature trees would be a possible solution.

C. In addition to the noise pollution, we are extremely concerned with the loss of privacy that would be the inevitable consequence of a row of campers sitting on the hill behind us, overlooking those who come here for a private farm stay getaway. Having a small "tent city" a mere 6 metres from our boundary line is a disturbing thought. We appreciate that since our initial meeting, the Taylors accommodated our request to move the proposed caravan sites further back in order to preserve the privacy of ourselves and our guests. Unless the tent area is also moved back out of sight, our privacy concerns remain. We strongly oppose the tents as per the current layout. We also strongly oppose the fact that there is no stated limit to the amount of allowed tent sites. This needs to be addressed.

D. The increased traffic associated with this proposal would also directly impact our business - Nannup Tiger Cottages, which relies on providing an authentic, peaceful getaway experience. Our guests choose us for our character—an immersive rural immersion with minimal disturbances. The anticipated surge in vehicles and people would congest our local entry road, create safety hazards, and detract from the serene atmosphere we meticulously try to maintain. The increase in daily vehicle movements would overwhelm our infrastructure and erode the very qualities that make our business viable. Furthermore, the surge in traffic on our shared dirt and gravel entrance, will accelerate erosion beyond the already burdensome maintenance levels, causing more than usual erosion and subsequent maintenance. At a minimum, we suggest a bitumen surface be added to the shared entrance road as well as a request for Main Roads WA to assess the impact of the increased traffic to East Nannup Rd. Taking into account the amount of vehicles associated with the proposed 40 caravan sites and unspecified number of additional tents, as well as a likelihood of 2-3 trips per vehicle per day (as we have noticed our guests typically make), this will lead to a significant increase in traffic, noise and road erosion impacting not only the users of East Nannup road but also the shire itself.

E. Of even greater concern is the extreme fire risk posed by the development's proximity to dense pine forests, with no appropriate evacuation routes in place. Our valley is already classified as a high bushfire-prone area under Western Australia's Bush Fires Act 1954, and introducing a high-occupancy site amid flammable pine trees is a recipe for disaster. In the event of a fire originating in or spreading to the surrounding pine forests (a scenario made more likely by climate change and dry conditions), the only viable evacuation route is the single access road leading into the proposed development. This road would be needed simultaneously for fleeing campers and incoming firefighting equipment and personnel, creating a bottleneck that could result in loss of life. Our private track, or "road," if you want to call it that, which serves our property, is neither designed nor equipped to handle the exodus of panicked campers and additional traffic; it is a narrow, eroded dirt track with limited capacity, and forcing its use in an emergency would exacerbate chaos and endanger everyone involved. The need for a comprehensive fire management plan in the proposal is of great safety importance. The shire should not ignore lessons from tragedies like the 2021 Wooroloo bushfire in Western Australia, where inadequate evacuation infrastructure led to widespread destruction and loss. The viability of the proposed evacuation through Lindsay road is also highly doubtful to be sufficient for the size and nature of an expected exodus of panicked campers in case of a fire.

F. Furthermore, the proposal's lack of an on-site manager is profoundly irresponsible. Management is slated to rely solely on remote cameras, with no human presence to monitor activities, especially at night when risks such as unauthorized fires, perhaps even during WA fire bans, unruly behavior, or medical emergencies are heightened. Remote surveillance cannot provide true 24/7 oversight, leaving gaps that would inevitably shift the burden of monitoring and intervention onto neighboring residents like ourselves. As a guest services business owner, I cannot be expected to act as a security force nor be expected to accept the implications of camp rules likely being ignored. I have spoken to caravan site owners and have been assured that even with the presence of on-site management, people regularly ignore camp rules and curfews. This arrangement of using remote camera management not only invites negligence but also heightens the Council's legal liability in the event of incidents. The proposed idea of on-site management for events only, is not sufficient. The act of starting a devastating fire doesn't take a full campsite of people, it only takes 1 camper to create a huge devastating fire.

G. Exacerbating these oversight failures is the applicant's inadequate plan for greywater and waste disposal, which yet again irresponsibly places the onus on individual campers to manage their own waste and rubbish. This "honesty and trust" system assumes that every person or group will responsibly handle and dispose of greywater and human waste without supervision—a naive expectation in a transient, unregulated setting. Inevitably, this could lead to improper waste and rubbish removal, potentially affecting even our local brook and becoming an unwitting repository for contaminants, which pose severe risks to water, ecosystems, and public health. Feral animals such as rabbits, pigs, rodents, and foxes are already a significant problem in the area, with data from the Western Australian Department of Primary Industries and Regional Development (DPIRD) indicating that invasive species cause over \$100 million in annual agricultural area losses statewide; the unmanaged introduction of human waste and rubbish would only attract and proliferate these pests, potentially exacerbating infestations and creating long-term ecological issues. Environmental regulations, including the Environmental Protection Act 1986 (WA) and the Contaminated Sites Act 2003 (WA), require robust waste management for developments of this proposed scale. Approving such a lax approach would not only violate these standards but also expose the Council to legal and reputational risks.

H. Finally, I would like to highlight the potential conflicts of interest and perceived nepotism in the handling of this development application. The applicant, Emmi Taylor, is the wife of the Shire's CEO, David Taylor, creating a direct familial connection that raises serious questions about impartiality and transparency in the Shire's decision-making process. This relationship could compromise the fair adjudication of resident concerns, potentially leading to biased assessments or expedited approvals that favor personal interests over community welfare. Past instances in Western Australian local governments have shown that such perceived conflicts can erode public trust. To mitigate these risks and uphold principles of good governance under the Local Government Act 1995 (WA), it suggest that the Taylor application be referred for independent review by an external body, such as the WA Department of Local Government, Sport and Cultural Industries. Failing to address the possible perception of advancing an influential shire employee's commercial interests above that of a shire resident, could undermine community confidence in the Council's integrity and invite further scrutiny.

In conclusion, we believe that the IKIGAI FARM "Nature Camp" application, in its current form, gives rise for concern to our environment, economy, and local way of life without offering any commensurate benefits to anyone other than the applicants and their business interests. We implore the Shire Council to reject the IKIGAI FARM "Nature Camp" application in its current form in order to protect our business security, property privacy, and the overall future of our local valley along the East Nannup Road. We in no way wish to sever the neighbourly relationship we have thus far maintained with the Taylor family and trust that our concerns and requests will be received and considered in good faith, working together towards a solution that would be mutually acceptable to all parties involved.

Thank you for your attention to this critical issue.

Yours sincerely,

Mrs. Suzanne de Beer

Owner, Nannup Tiger Cottages

Mobile: 0410 878998

Email: [suzannedebeer@bigpond.com](mailto:suzannedebeer@bigpond.com)

Sent from SDB iPhone