

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

2nd Response to “Development Application – Lot 45 East Nannup Road, East Nannup – Proposed Nature-Based Park”

The revised proposal for the caravan park has addressed some of the issues raised in our first response. However, the proposal is still vague in several significant areas and is not acceptable.

1 Description of Sites

The reduction of 40 “vintage caravans” to 20 fully self-contained sites (plus 10 dome tents) is noted.

2 Waste Management

The proposal states that the proprietors will keep a “close eye on” factors related to waste management. What does this mean? How often will the property be inspected for cleanliness and/or hygiene breaches? How often will the waste containers be emptied? It should be noted that there is no rubbish removal service provided by the Shire of Nannup for East Nannup.

3 Noise Management

The original proposal referred to noise-reduction screening. The current proposal does not. Bearing in mind that my initial response suggested the screening would be of little value, the proprietors may have decided to abandon it. However, if it is still to be constructed, will it be artificial or natural as described in my first response? The 10pm curfew is noted.

4 Remote Management

The Shire of Nannup Local Planning Policy #9 states that, where management is offsite (although onsite is preferred by the Council), a manager or contactable employee must reside within 45 minutes from the application site. While the proposal states that the manager lives within this time bracket, what arrangements will be made should contact be necessary and the manager is absent?

5 Traffic Management

The traffic management concerns raised in my previous response have not been addressed. East Nannup Road is 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.

6 Risk Management

The presence of an onsite camp manager when a Bushfire Advice has been declared is noted. I am not convinced that the proprietors will be able to adequately monitor adherence to noise

and hygiene management via the proposed video camera. The proprietors may also find that the available phone reception is unreliable.

7 Conflict of Interest

The concerns related to conflict of interest have not been addressed. 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/departments/publications/publication/disclosures-of-interest>).

Furthermore, the Shire of Nannup Code of Conduct for Staff Members states that staff members:

Must make a disclosure in writing to the CEO, Manager, selection panel chair or tender evaluation chair as appropriate before dealing with any applications, tenders, permits or licences or performing regulatory or enforcement functions as part of their role which involves relatives, close friends, adversaries or associates.

(https://www.nannup.wa.gov.au/Profiles/nannup/Assets/ClientData/Code_of_Conduct_Saff_2016.pdf, p.6)

The proposal was submitted by Ms Emmi Taylor. Ms Taylor is the partner of Mr David Taylor, the current Chief Executive Officer of the Shire of Nannup, and it is this Council that will determine the acceptance or rejection of the proposal. Furthermore, the CEO will be responsible for adherence of the proprietors to local law, and overseeing any necessary action should adherence be breached. It is clear that a conflict of interest exists, yet this has not been disclosed, and the proposal contains no detail with regards to how any aspect of this conflict would be addressed.

Summary

While we do not object to a nature park in principle, the quality of the business proposal in which the nature park is described is unsatisfactory. The business proposal needs to be detailed and unambiguous, to prevent any future misinterpretation or reinterpretation. 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

Mrs. Suzanne de Beer
Mr. Bradley Marcus
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0410878998
October 29, 2025

Ms. Erin Gower
Development Services Officer
Shire of Nannup
15 Adam Street, P.O. Box 11
Nannup, WA 6275

**Re: Updated Objection to replace the Proposed Development Plan for IKIGAI FARM Nature Camp at Lot 43, East Nannup.
Application Reference Number A1872**

Dear Ms. Gower and the Nannup Shire Council

Sadly, we must once again request that the Nannup Shire Council not approve the latest update to the proposed IKIGAI FARM Nature Camp application, reference number **A1872**. Though we do very much appreciate the new, updated development application as an attempt to make peace with the neighbors, it still leaves several issues unresolved, and we would like to address them here so that Mr. and Mrs. David Taylor can proceed with their nature camp concept. Ms. Gower and the Council for the Shire of Nannup, we believe that full transparency in the language of the proposal is needed in order to come to an agreement with the applicants under the **Nannup Shire policy LPS4**, at least, as we interpret the primary rule, namely:

- The said development should be located to avoid ridgelines, escarpments, and other visually prominent areas to help preserve the natural landscape character and mitigate environmental and visual impact, while prioritizing the protection of natural, visual, and community values.

Based on the new development plan, the **IKIGAI FARM Nature Camp** site is on an exposed hilly ridge, clearly visible from East Nannup Road, with no proposed screening to lessen the development's visual impact.

Some additional points that need to be tackled before moving this project forward:

1. Is this, in fact, a small-scale nature camp – 20 self-contained sites accommodating up to 120 guests and 10 glamping-style tents accommodating up to 44 guests? Given the number of guests it might attract — north of 150 — this comes across more like a caravan park and “tent city” than a low-key, small-scale nature camp situated on predominantly improved farmland.
2. Given the number of potential guests, it is not unreasonable to anticipate a higher-than-normal volume of caravan, car, and ute traffic along the road of the ridgeline, generating a fair amount of engine noise and stirring up airborne gravel, dust, and dirt, whereas the applicant says that there will only be a “small” increase in traffic.
3. Concerning late-night gatherings around a proposed fire pit, the development’s curfew of 10:00 pm appears to lack details on limitations due to special events and on-site enforcement guarantees, particularly given the potential for 150-plus nature camp enthusiasts congregating on a ridgeline so close to our already quiet and established Nannup Tiger Guest Cottages hospitality business.
4. While fire risk is always a possibility, should we assume that all nature camp guests will automatically do the right thing, or should we assume that signage to urge caution is “good enough”? Nonetheless, we will leave fire risk management to the local fire brigade, as they have the expertise to determine what can and cannot be done for firefighting and to ensure everyone's safety.
5. As previously stated, the applicant’s updated proposal lacks an on-site manager to enforce nature camp rules, even though we have been assured that the site will be supervised 24/7 via remote cameras. Our question is this: Is it reasonable to think that Mr. and Mrs. David Taylor (or perhaps someone else appointed to the charge of supervision) will be monitoring the site day and night – 24/7? And then, if there are offenders against camp rules, should we be asked to do enforcement for the applicant and with each offense, to call in a complaint at some odd hour of the late evening or night, and, like clockwork, expect a compliance/enforcement representative to be immediately summoned and on hand within 45 minutes of the call, as the development applicant assures us? True, the applicant says he is only 5 minutes away from the site. However, a 5-minute theory and a 5-minute reality are naturally two different things.
6. Finally—and importantly—the applicant for the updated “nature camp” has provided no written details or guarantees that guests will not overstay their short-term visit.

In conclusion, the proposed development of the IKIGAI FARM Nature Camp, reference Number A1872, ultimately introduces:

- A farmland campground on a highly visible ridgeline, which should not be considered “small scale” given the anticipated number of potential guests, north of 150
- Inadequate property line setbacks
- A negative impact on the rural landscape
- Increased road traffic and noise levels, which do not align with the **Nature-Based Parks Licensing Guidelines, the Caravan and Camping Grounds Act 1997, LPP-9, and LPS-4**

We urge the council to be prudent in its deliberations and to avoid setting a precedent by approving this proposal in its current form. Please inform the applicants that we desire to be neighbourly and that we also request details, meaning we cannot be relaxed with a lot of vague development language.

Yours sincerely,

Mrs. Suzanne de Beer



Mr. Bradley Marcus

Bradley Marcus

Nannup Tiger Cottages

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To: The Shire of Nannup
Planning Department & Councillors

Greg Crothers
134 East Nannup Rd
25th October 2025

Re: Development Application

Ref A1872

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

This submission replaces my submission to the original proposal.

It is pleasing that the developer has listened to some of the community's concerns, although many remain to be addressed. It is still vague, light on detail and ambiguous. For example what is the maximum number of guests, does event camping mean extra guests and what is the proposed length of stay.

I am a neighbouring landholder to Lot 43 and wish to formally object to the above proposal on the following grounds.

1. Misclassification

This application proposes **20 self-contained sites (up to 120 guests)** and **10 glamping style tents (up to 44 guests)**. Potentially **164 guests** (guest numbers are ambiguous). The property (Lot 43) is **predominantly improved pasture**, with only minor natural vegetation along Nannup Brook and limited scattered trees.

Under the **Nature Based Parks: Licencing guidelines for developers and local government**, a *nature-based park* is:

- “Meant to be **small scale**
- With sites positioned to **avoid environmental and visual impacts**, and
- With a **low level infrastructure and site density**
- Not in close proximity to ... structures used for business ..

The guidelines also state “the prime consideration is whether it is a primarily **undisturbed natural setting** and of a scale that is environmentally sustainable. Before granting a nature based camp licence, the local government needs to consider, if there is a more appropriate licence, e.g. caravan park, camping ground. A nature based camp licence should not be used as an opportunity to reduce facilities where a more appropriate licence category could apply.”

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

Under **LPP-9**

- larger scale developments should not be on rural land.
- should be sympathetic with the landscape and minimise visual impacts

This proposal does not meet this intent:

- **Site** – is in close proximity to cattle yard and farm shed and is on an **exposed ridge clearly visible** from the East Nannup Road and surrounding properties. No screening is proposed by the developer to mitigate the visual impact. No visual amenity assessment is provided.
- **Scale** – in the context of rural tourism in Nannup this number of guests could not be considered small scale and resembles a caravan park / camping ground rather than a dispersed, low-key, small scale nature camp.

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

I would suggest that the council require the proponent meet the **small scale intent** of the guidelines and the **low visual impacts** required by local policies.

2. Boundary Setback – Only 6 Metres

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

Under LPP-9

- Developments should be sited to **avoid potential conflicts** with normal farming operations on adjoining properties
- Provide appropriate **setbacks/buffers** to adjoining uses to be a “good neighbour”

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. A sign will not pacify guests when I am spraying.

The proposal states “ **The land on the other side of the boundary fence is cleared land allowing unlimited space for fire fighting**”. It indicates a recognition by the proponent that **a 6 m setback is insufficient** to contain a fire on their land.

Bushfire risk – 6 m setbacks fall well short of a safe setback for this scale of development on rural land and does not provide defensible space in a bushfire-prone landscape.

LPP-9 requires Council to consider **existing land uses of adjoining** properties.

In the interest of avoiding future complaints and conflict I would urge the council to require a setback of at least **50m** and the planting of **advanced trees and shrubs** to screen the development from neighbours and the East Nannup Road.

3. Bushfire & Evacuation Risks

Key risks:

- **Patron numbers** – Campground could host up to **164 people**.
- The plan to “let it burn” neighbours land to contain a fire is an **unacceptable fire fighting strategy** and is a shirking of the landholders responsibility (apparently endorsed by Shire of Nannup Development staff). Planning to fight fires on neighbours property should be a fall back strategy, **not the first strategy**. This does not meet the “good neighbour” intent of LPP-9.

- **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 and closed completely during logging operations. Guests exiting via this road risk turning towards locked gates or a more hazardous situation on an unfamiliar maze of gravel tracks.
- Using a neighbour’s property for evacuation “*if permission is granted*” — this is speculative and unreliable. Neighbours have not been consulted.
- **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. **LPP-9** states, the shire prefers onsite management.

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

I urge the council to require that the applicant develop a fire mitigation strategy that **does not rely on burning neighbours land** and revisit the evacuation plan.

4. Sanitation & Wastewater Risks

This application assumes some patrons will be **fully self-contained** and will remove wastewater and effluent from the property while the glamping tents will have access to 2 toilets.

This is not credible:

- Experience from other campgrounds shows that even the self-contained guests will use the 2 toilets. Given the opportunity people will use these toilets in preference to their caravan ones, 2 toilets is not enough for this number of guests.
- **Greywater leakage** – experience from other campgrounds shows that some campers discharge waste on-site. This risks contamination of soil, watercourses, and neighbouring land.
- **Enforcement is impossible** – the manager is based 4 km away and cannot practically verify that every guest removes waste or does not use the glamping toilets. CCTV is only effective in daylight hours and continuous monitoring is unlikely.
- **Length of stay** is not mentioned and is required for a management plan. This is an important consideration in regards to waste water risks.
- Some of the self-contained sites appear to be close to a swampy waterway (the setback is unclear in the plan provided), another potential waste water risk.
- **Public health non-compliance** – WA Department of Health guidelines require effluent management systems proportionate to patron numbers. For 164 plus people, proper facilities are mandatory, not optional.

Nature Based Park Guidelines state “ **every developer ... must undertake an environmental health risk assessment** “.

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 caravan park /campground onto an **exposed ridge** in a farming precinct.
- Introduces potential conflict with existing primary production.
- Misuses the “nature-based park” label to avoid caravan park standards.
- Provides servicing and management arrangements far below the level required for the proposed scale.

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 entrance/exit is also at an **acute angle** to East Nannup Road further **restricting visibility when exiting**. The combination of a 110 km/h default speed limit, road train use, and increased tourist traffic presents a real safety hazard and fails to meet basic traffic engineering safety standards for tourist access.

LPP-9 section 5 does not support short term accommodation where there is a **potential for traffic generation to cause undesirable nuisance or safety issues**.

The applicant states that there will only be a “small” increase in traffic. No evidence is provided. An extra 100 plus car movements per day is a significant increase to present traffic, not a small increase.

I urge the council to require a traffic impact assessment be provided and to assess the entry/exit to Lot 43.

7. Event Accommodation as an Aggravating Factor

(It is unclear from the proposal if event accommodation means extra guests).

While this objection is directed at 30 sites mentioned, event accommodation only makes concerns worse.

Adding an **undefined number** of extra guests

- Intensify patron numbers and activity
- Increase wastewater generation and treatment risks
- Puts extra pressure on 2 toilets
- Further increase noise and traffic
- Further increases risk of fires
- Further increases visual impacts

Request

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

1. **Reject the proposal** on the grounds of misclassification, high visual impact, inadequate setbacks, farming conflicts, bushfire risk, sanitation risks and road safety.
2. Look at the approach of other local governments that have already developed policies with regard to nature-based parks. For example the City of Albany LPP3.1 (50m min. setback and max. 10 sites)

3. Ensure the application is assessed with **independent planning advice** and that **conflict-of-interest protocols** are transparently applied.
4. I would like to **invite councilors** onto my land to view the proposed development site.

Closing Statement

I support sustainable and well-planned tourism for Nannup. However, this proposal introduces **a large-scale, highly visible** campground on farmland with inadequate setbacks, potential conflict with existing farming properties, poor emergency exits, unenforceable waste management and with a negative impact on the rural landscape. 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.

I would urge the council to be prudent in their deliberations and not to set a precedent by approving this proposal in its current form.

Yours sincerely,

Greg Crothers.

134 East Nannup Rd

Neighbouring Landholder to Lot 43

Submission Regarding Ikigai Farm Nature Camp Proposal – Lot 43 E Nannup Rd

Attn: Erin Gower
Development Services Officer
Shire of Nannup

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 at Nannup Hospital. Over the same period, I have been co-managing the farm with intent to allow my father's retirement. 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."

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.

Reasons for Objection

1. The proposal does not satisfy the definition of a "Nature-Based Park"

The Shire's *Nature-Based Parks Licensing Guidelines* require a development to be **small-scale, low-impact, and limited to a modest number of visitors**.

- **Visitor capacity:** The application proposes a peak capacity of **more than 160 persons**, which exceeds the informal small scale benchmark applied to comparable Shire projects.
- **Site visibility:** The site sits on a prominent ridgeline that is clearly visible from residences and from East Nannup Rd, contrary to the guideline's expectation that parks be sited to minimise visual impact.
- **Density of built-up:** A 160-person facility on less than 5 acres cannot be described as "low-density" under the guidelines.

Given these discrepancies, the development should be classified as a **caravan-park-type use** and assessed as such. Doing so would mean that the proposed development would come under the appropriate regulatory and planning framework.

2. Non-compliance with Local Planning Policy 9 (LPP 9) – Tourism Land Uses & Short-Term Accommodation

LPP 9 sets out requirements for short-term accommodation, including adequate on-site buffers for fire safety, noise, dust, waste and chemical drift.

- **Fire-break buffer:** The proposal provides only a **6 m setback** from the property boundary. The applicant notes that "The land on the other side of the boundary fence is cleared land allowing unlimited space for fire fighting" referring to the land co-managed by myself and my father. This is a tacit admission by the applicant that any fire **would indeed immediately threaten the adjoining property** and that there is insufficient space for fire control within the applicants property. The applicant may believe that observing the responsible fire control measures of their neighbours negates their own responsibility to contain a fire within their own property, an opinion which I believe

does not stand up to even casual scrutiny and certainly **undermines the “good neighbour” intent of the policy.**

- **Noise, dust, litter and chemical drift:** LPP 9 requires “adequate on-site buffers to protect adjoining land uses.” A 6m setback fails to buffer noise, dust, or litter, and may restrict safe use of agricultural chemicals on our adjacent farm which contravenes LPP9 on protecting established land use of adjoining properties.
- **Evacuation plan:** A prior version of this application that was made open to public comment had an evacuation plan that consisted of exit through the rear of the property or through the adjoining property. With regards to evacuating through the rear of the property, I am not certain I could reliably navigate through those pines under stress, even as I grew up trail riding through them. As for evacuation through the neighbouring property, this was suggested with no consultation or consent, would require taking down fences and distracting us from protecting our own property, of course in an emergency permission would be granted but it is clearly not an acceptable first line plan. Of course I acknowledge that I am referring to a now superseded application but the purpose of raising it here is that the current application only states “a Bushfire Evacuation Plan will be provided”, one can infer that **the applicant has no adequate answer to criticisms of the proposed evacuation plan in the prior proposal** and therefore has deferred answering them.

3. Traffic, Safety and Visual Impact

LPP 9 requires the council to “have regard for potential impacts on the amenity of the surrounding area and will consider matters including: – anticipated traffic generation” I would note that East Nannup Rd is arguably not adequate for its current use.

- **Road characteristics:** East Nannup Rd is a narrow, winding two-lane rural road used by heavy vehicles and forms part of the Munda Bididi Cycle Trail.
- **Entry location:** The proposed vehicle **entry is situated on a sweeping bend with limited visibility**, creating a heightened collision risk for both motorists and cyclists, especially considering large vehicles and caravans will be routinely using this entrance.
- **Traffic volume:** With a capacity of 160 persons plus undefined overflow, daily traffic volumes would increase substantially on a road already a road-train route. The existing infrastructure is unlikely to accommodate this additional load without upgrades, which in turn would erode the rural character of the corridor.

4. Off-site management is inappropriate for a development of this nature

While the applicant correctly notes that LPP-9 requires offsite management to be a maximum of 45minutes of the property this obfuscates that the same document states that the shire **“prefers onsite management”** as would be appropriate for a development containing a majority of “self contained” sites.

Self contained sites, by their nature, raise concerns about waste disposal, and adherence to fire bans and appropriate cooking practices.

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.

5. Inadequate provision of ablutions

Proposed ablutions are two toilets and two showers. The applicant is at pains to suggest point out that ablutions are not required for “self contained” sites, this is entirely theoretical and it is wildly implausible that

ablution blocks will not be used by the majority of guests. This raises flow on concerns(pun not intended) regarding waste-water management.

6. Questionable commitment to regenerative practices

Observations of current farm management indicate reliance on set-stocking, which is not aligned with the regenerative-agriculture narrative presented in the proposal. Without demonstrable change in practice I find it implausible that there is a genuine ideological commitment to regenerative agriculture as suggested in the proposal and therefore there is substantial doubt that this will be an ongoing commitment if this proposal is approved. Such commitments cannot be taken seriously and therefore cannot be considered a point in favour of this proposal.

Conclusion

For the reasons outlined above—failure to meet the statutory definition of a Nature-Based Park, it is high capacity and dense which is not in compliance with LPP 9, significant fire-safety and traffic risks, inadequate buffers for adjoining land use, and a clear conflict of interest—the proposal is fundamentally flawed. Further, Council ought to be wary of the precedent set by approving high capacity, high density developments in primarily agricultural lan. The only appropriate outcome is an outright refusal of the development application until such a time as the applicant provides a proposal more in keeping with Shire policy and the rural character(and zoning) of the area.

I appreciate your careful consideration of these concerns and look forward to the Council's unanimous rejection of this application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JWC Acacia'.

Dr JWC Acacia, MBBS FRACGP
134 East Nannup Rd, Nannup
josh@acacia.email
0430 934 327

JT Kilcoyne-Betts and HK Uppal

Seraphim Retreat
253 East Nannup Road
East Nannup

28 October 2025

Dear Erin

Thank you for sending through the revised business plan for Ikagai Farm. We note the short period for response and apologise for the quick nature of this email as we are currently travelling in India and have very limited IT facilities.

We refer to the revised business plan (RBP), our initial response (IR) and also our neighbour Dr Graham McMahon's response, which he has kindly shared with us. Our objections in the IR stand on the same terms, subject to the points below.

1. Quality of Business Plan

We note and acknowledge the concessions in the RBP. It is more limited in scope and several areas of concern are mitigated. However, we concur with Dr McMahon in his objection that the RBP is wholly insufficient in detail and quality. We would need sight of the proposed conditions in the DA and subsequent planning permission to understand how detailed and clear cut they will be, and how the Shire would be able to enforce them on the current and any subsequent owners or operators. Vague reassurances that a "close eye" will be kept on matters of great importance to us is of no substantive comfort.

2. Conflict of Interest

We did not raise this matter in our first response but take this opportunity to reiterate the points that Dr McMahon makes in his letter.

3. Management and monitoring

We still believe that onsite management is needed for a development of this size. The nature and quality of guests is outside the control of the owners, and we note with amusement the naivety of the aspiration that the business will be more than "a bed for the night". All of us in the industry would say this; it is entirely unpersuasive. We therefore refer you to our points on fire safety, numbers, noise and traffic in our IR. CCTV is no substitute for onsite management to ensure guests behave, adhere to rules (particularly the 1 car rule) and act safely. The deterrent effect and early response is key.

4. Noise

The RBP no longer refers to screening, or any measures to mitigate the impact on the amenity of neighbouring homes and businesses of noise and cars. With a potential occupancy of 150 guests, this needs serious attention. We note with concern the proposal

for a generator back up on site. The noise from this would carry across the valley, and we object strongly to it.

5. Traffic

As Dr McMahon says in his letter, the RBP entirely fails to address concerns about the effect of local traffic on walkers, cyclists, horseriders and the local amenity generally. We note the reduced number of cars compared to our estimates but the proposed development still represents a fundamental change to the traffic flows on East Nannup Road, which in turn impact the use of this road to attract guests to the area and to our business in particular. The RBP is also unclear whether the one car per site rule will apply to the dome tents too, and we are concerned this will not be enforced or that families will park a second car on the road, if it is. Our business cater to up to 6 guests (ie the impact of a single camp site at Ikigai) and we almost never had a group with only one car! In short, we anticipate the real impact of peak occupancy to be substantial. Thirty sites will probably generate at least 40 cars, with multiple journeys a day, increasing traffic by a factor of at least 3, and likely higher. We agree that the road is sufficient to bear this but the impacts described in our first letter have not been addressed.

6. Over Supply

The RBP makes a bare statement of business need without any evidence. We reiterate our points on oversupply, which are based on direct knowledge of the state of the industry.

7. Fire

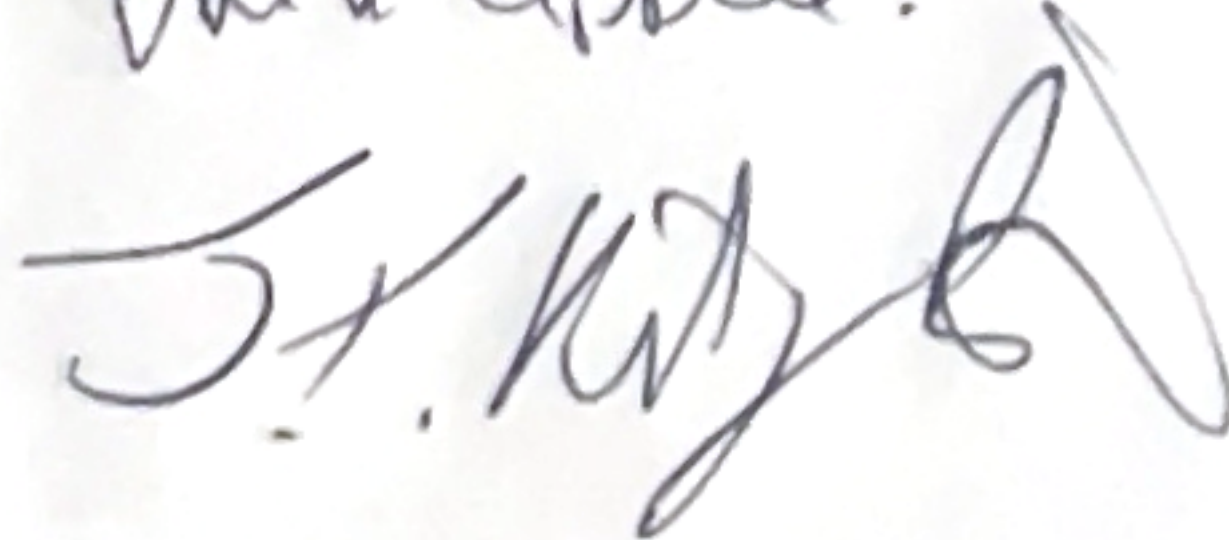
What will be the trigger for a manager to drive to the site? Is it not possible that roads will be closed, making this impossible. Again, we would like to see a manager on-site. While the track may be 2-lane, we understand the bridge is 1-lane, so we reiterate our concerns on fire in full.

Kind regards

Jacob Kilcoyne-Betts

Dr Harleen K Uppal

Dr H. Uppal.



To: The Shire of Nannup's Planning Unit – Erin Gower, Development Services Officer
Ref: A 1872
Re: **Objection to proposed Development Application**
"Updated Ikigai Farm Nature Camp", Lot 43 East Nannup Road, East Nannup

I am a direct neighbour to Lot 43 and submitted a response to the first development plan on 1. September 2025. The updated plan does not specify what changes were made or how Mrs Taylor has addressed her neighbours' concerns on East Nannup Road. According to LPP-9, matters related to being a 'good neighbour' are also part of the management plan, which is missing. This submission replaces my earlier response.

I wish to formally object to the above proposal on the following grounds:

Misclassification

Although the individual site sizes and temporary glamping domes meet minimum requirements, the overall scale, infrastructure, and density—up to 164 guests on 1.5 ha—contradict the guideline's intent for small, low-density nature-based parks. Shared ablutions, a camp kitchen, and structured glamping resemble a caravan park rather than a nature-based campsite. Additionally, existing stockyards next to the shed, visible from East Nannup Road, conflict with Ms Taylor's definition of a nature-based park

Recommendation:

- Reassess the licence category: the proposal resembles a **hybrid caravan/camping ground**, not a dispersed, low-key nature-based park. Council should consider whether a camping ground licence is more appropriate.
- Reduce guest numbers: to meet the **"small scale" intent**, the proponent should lower capacity and increase site dispersion.
- Clarify infrastructure: detail how ablutions, water, and waste will be managed without exceeding the **"low infrastructure" threshold**.
- Place the stock yard outside of the campground, at least in 100m distance or move the campground to another area of the farm.

Visual impact on surroundings

Under Nannup Shire LPP9, rural tourism developments should minimise visual impacts, especially when viewed from State and regional roads and key tourist routes. The combined presence of tents, vehicles, and ablution blocks visible from East Nannup Road may conflict with this requirement.

Recommendation:

- Provide a visual impact assessment: especially given the **ridge-top location and visibility** from East Nannup Road.
- Support the **planting of vegetation** to protect the sight of the campground from neighbouring properties and from East Nannup Road.

Environmental Impact and Sustainability

Rewilding, preservation, and soil health measures are **vague**, and **no ongoing environmental monitoring** is proposed, risking long-term degradation and potential harm to Nannup's tourism reputation.

Recommendation:

- Include **adaptive management strategies**.

- Provide a **vegetation management plan** outlining:
 - Specific rewilding actions (e.g., species selection, planting schedule)
 - Weed control measures
 - Monitoring and maintenance protocols
- Include a schedule for inspections, reporting to council.

Missing Bushfire Risk Assessment and Mitigation Plan

The plan assumes the site is not 'Bushfire Prone' and omits a site-specific bushfire risk assessment, despite being adjacent to plantation. The **evacuation route via Lindsay Road is unreliable**, as it leads into a mature pine plantation and is closed while logging takes place, posing safety risks. Relying on neighbouring land instead of implementing proper fire mitigation is unacceptable. A proactive fire prevention plan, independent of neighbouring properties, is missing.

Recommendation:

- Conduct a **site-specific bushfire risk assessment and fire mitigation strategy**.
- Include vegetation management, **firebreaks**
- Include seasonal closure policies and coordination with DFES.

No Details about a Firefighting Equipment and Emergency Services

A firefighting unit is mentioned, but no details on type, capacity, or training to ensure equipment remains effective and safe.

Recommendation:

- **Specify equipment type**, maintenance schedule, and who is trained to use it.
- Establish liaison protocols with local emergency services.

Waste Management Ambiguity

To require campers to take their waste with them **is not enforceable or reliable**. "Waste collection serviced/emptied on a regular basis" is very vague (daily, weekly, monthly?). "To keep a close eye on cleanliness and preservation" is also vague and not realistic, if the owners rely on CCTV footage.

Recommendation:

- Deliver a **robust waste management plan** with clear accountability.

Potable Water Safety

Rainwater and carted water are mentioned, but **no treatment or testing protocols**. There is a potential risk of illness from untreated or contaminated water.

Recommendation: Include

- water quality testing schedule,
- treatment methods,
- contingency plans during drought or supply failure.

Sewage and Greywater Management

Ablution block plans are vague; **no mention of greywater systems or treatment**.

Recommendation: Detail

- the type of toilet systems (e.g., composting, septic),
- greywater disposal methods,
- Department of Health approvals.

Management Plan – Missing Requirements

There is **no specified length of stay of occupiers**, which is a mandatory requirement within the management plan.

Conflict of Interest and Public Trust

Lot 43 is owned by the Shire CEO, David Dean Geoffrey Taylor, and the applicant is his wife, Emmi Lee Taylor. Unlike elected councilors, the CEO is a permanent employee, which could **place Council in a difficult position** when assessing or approving a development that benefits its CEO, enforcing compliance, or responding to complaints. The Council's independence could be questioned.

Recommendation:

Develop **an independent external assessment and enforcement** to safeguard public trust, ensure transparency, and protect the Shire from reputational or governance risk.

Request

While the development plan shows intent toward sustainability and low-impact design, I respectfully request the Council **reject the Nature-Based Park proposal** for Lot 43 (Ikigai Farm).

The plan does not meet the classification of a low-impact, minimally serviced campsite: its scale, infrastructure, and environmental footprint are inconsistent with a nature-based park, and it lacks a thorough Environmental Health Risk Assessment, clear mitigation strategies, and defined visitor stay limits.

My objection is not against tourism or local business—having supported a farm in Nannup since 2016, I fully support responsible, compliant enterprises. My concern is the scale, management, and potential risks of this proposal, 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 Shire planning and environmental standards.

Yours sincerely,

25. October 2025

Dr. Margarita Betancor DAppSc (Phys)
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 Nancy Tang

Cr Timothy Sly

Cr Lynette Curtis

Cr Vicki Hansen

DEVELOPMENT APPLICATION – AMENDED 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 unsure of whether the original development application is still in play along with this amendment so I will address both applications. There has been nothing to identify one is replacing the other. The correspondence from the Shire detailed updated business plan and amendments to the original, so the points raised in the original application are they still in play? The second submission is quite different to the first but it is still unclear whether it's in addition to the first or in place of. AND it is this reason why I had requested an extension to the submission period. If it's in addition to the first application the number of guests/campers allowed significantly increases. Both the initial Shire correspondence and follow up response is ambiguous and I am still unclear on whether the proposal is 1 or both. I am a resident and landholder on East Nannup Road and wish to object to Stage 1 and 2 (if there are still stages?) 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 through 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. A sign advising campers not to dump/leave waste does not control or manage the associated risk nor should signage be an accepted management tool. It's too late once the waterway has been contaminated. I would encourage councillors, as our community representatives to ensure zero risk.

- 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 amended application mentions they are within the allowed reaction/travel time associated with off-site management. The question remains how rapid would this response be if there is no on-site management to operate a firefighting 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. The developers are putting our valley, and residents, at a high fire risk. Once a grass fire takes hold the likely outcome would not be good for any of us. If we are to consider both applications received then this significantly increases the number of guests/campers within this area AND the developer is still stating there will be no on-site management. Too higher risk for any responsible council to consider in my opinion.
- 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. 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 development makes mention, in the amendment application, that there will be 3meters between each self-contained site to ensure everyone enjoys their stay with sufficient space. I'm not sure if the developer's tape measure is different to mine BUT 3 metres is not a large space whether it is above what is allowable or not. The application makes no mention of parking areas. Are there parking areas in front or beside the self-contained sites? Any vehicular movement over grassed areas during our high-risk fire season would increase the associated risk for property fire. AND if there is guest parking next to each self-serviced site then the 3meters mentioned is well less. This should be clarified. There is nothing nature based about 20 self-contained sites including parking all pushed together in a corner of the property. Assuming the indicative plan is accurate.
- g) 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 fund the associated cost.

Regards

Jenny Styles

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Response to the Revised Business Plan “Development Application – Lot 45 East Nannup Road, East Nannup – Proposed Nature Based Park”

Attention: Erin Gower – Development Services Officer Shire of Nannup

Be advised that my original response remains as provided and this letter formally raises additional concerns regarding both the original and revised business plans. I am not sure if the farm is a nature camp or a nature-based park, however it does not address many of the concerns raised. The revised business plan, specifically the attachments are ambiguous and do not make sense (colour coding)

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. For example there appears to be 2 bathrooms with one toilet – is this enough for the full amount of people that may be in attendance?

2. Nature based park or nature Camp

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. This area if it is a commercial animal production area how is it formed by nature? 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

Whether glamping-based tents and or self-contained sites this would not be acceptable and would have a significant impact visually for neighbours and would not enhance the natural environment. Similar during major events with some 200 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

There is a statement stating that it has next to zero artificial light and noise intrusion. 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. Secondary back up power in the form of a generator in a shed will still cause a noise problem at night.

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 200 plus 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 and noise issues for neighbouring 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. you cannot rely on public to take control of an emergency. A full time person needs to be on site at peak periods.

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.

Neil J Wilson

Nannup Resident

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