

Attachment 11.1.5

SCHEDULE OF SUBMISSIONS – Lot 1 Jalbarragup Road, Jalbarragup

Proposed Development Application (Camping Ground, Function Room and Ablution facility)

Submission #	Name & Address	Support / Oppose	Submission Comments/Issues	Applicant Response
10	Name & Address provided	Support	<ul style="list-style-type: none"> Supports employment in the Shire Existing accommodation business has no negative impacts on the environment or local community 	<ul style="list-style-type: none"> Noted – Agreed Noted – Agreed
21	Name & Address provided	Support	<ul style="list-style-type: none"> Development would be beneficial to both the Shire & Jalbarragup locality 	<ul style="list-style-type: none"> Noted – Agreed
22	Name & Address provided	Support	<ul style="list-style-type: none"> The few extra vehicles will cause minimal disruptions on Stacey Rd 	<ul style="list-style-type: none"> Noted – agreed. <p>It is considered that the additional number of vehicles accessing/egressing the site will be negligible in context with the proposed camping ground being limited to 25 powered and unpowered sites.</p> <p>Traffic Count information for Jalbarragup Road was received from Council's Technical Services Department. The readings are appended to this Submission Response for Council consideration. The observations made below are made in context with the readings between Friday 19 July 2019 – Tuesday 1 August 2019. The following observations are made –</p> <ul style="list-style-type: none"> Recordings were taken across a standard week and weekend The total number of vehicles driving along Jalbarragup Road on any given day ranged from 9 (lowest) on 23 July to 40 (highest) occurring on Friday 26 July, The highest AM Peak was 7 vehicles travelling at 9am on of Monday 29 July, The highest PM Peak was 6 vehicles travelling at 3pm on

Friday 26th July and at 2pm on Thursday 1 August respectively,

- As agreed by Council Technical Services Officer, these traffic volumes (including peak traffic volumes) are considered to be extremely low,

The following traffic estimates and observations in context with the proposal are provided –

- At full capacity, the highest number of vehicles accessing the camping ground could reasonably equate to 25 noting that, in almost all circumstances one vehicle will likely be utilising one camp site,
- It is reasonable that vehicles accessing the camping ground will make one access and egress/from to the camping ground per day. This equates to an additional 50 vehicle movements during the day – which (if using the times between 7am to 7pm), would equate to an additional 4-5 vehicle movements per hour – if at full capacity.
- The additional vehicle movements would therefore fall well within the existing range of traffic movements already occurring on Jalbarragup Road,
- In addition, the times for camper accommodation vehicles accessing/egressing the camping site from Jalbarragup Road will stagger throughout the day and will have a negligible impact on peak times – which are already considered to be very low.
- At full capacity the Function/Activity Facility/Room is proposed to accommodate 150 people
- In accordance with Schedule 2 of the Council's Scheme, it is reasonable to apply the parking requirement in accordance with the Reception Centre land use of *' 1 bay per 4 seats, or 1 bay for every 4 persons the premises is designed and approved to accommodate, whichever is the greater.*
- This equates to 38 car parking bays being required.
- The updated Site Plan provided with this submission response demonstrates that the land has adequate capacity and access from Jalbarragup Road to accommodate 38

		<ul style="list-style-type: none"> No more noise than current residents whose behaviour echoes along river valley 	<p>vehicles as and when events are held in the Function /Activity Facility/room,</p> <ul style="list-style-type: none"> The 38 vehicles accommodated on site in relation to community based functions also fall within the range of traffic movements on Jalbarragup Road. These functions will not be taking place on a daily basis and will be dependent on demand to use the facility by community groups. Furthermore, it is reasonable to note that the camping facility is unlikely to be occupied to full capacity during certain periods of the year (during winter months for example). The total number of traffic movements are therefore considered to be reasonable and will not cause any traffic concerns on Jalbarragup Road, noting the road has clear capacity to accommodate the vehicle movements that stem from this Development Application. The conversion of the existing shed to a Function /Activity facility will enable the structure to be used by the camping patrons and also provide an opportunity for separate functions able to be undertaken to support community based functions/gatherings etc (celebrations, craft groups, children’s activities (ie dance), music, meetings and social gatherings) <ul style="list-style-type: none"> Noted and Agreed <p>The proposed camping ground would provide no more noise than other human based activities that take place within adjoining ‘Rural’ zoned land or ‘Rural Residential’ zoned land located on the other side of the Blackwood River, with the closest lot being at least 230m away from the proposed camping ground, ablution facility and function/activity centre site.</p> <p>The proponent confirms that noise and guest behaviour will be managed according to guidelines as proposed by Shire policies</p>
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				<p>and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA)</p> <p>The Camping Ground and associated land uses will also be managed in line with a license issued under the Caravan Parks and Camping Ground Act 1995 and associated Caravan Parks and Camping Regulations 1997. A License issued under the Act & Regulations attends to such matters as</p> <ul style="list-style-type: none"> - provision for recreational facilities/areas, - provision of ablution and toilet facilities, - laundry and washing up areas, - lighting and noise, - fire- fighting equipment and provision of water supply - waste management and on-site traffic management (slow speed limits)
25	Name & Address provided	Support	<ul style="list-style-type: none"> • Additional employment opportunities • Additional accommodation during events 	<ul style="list-style-type: none"> • Noted – Agreed • Noted – Agreed
31	Name Provide & Address Not Provided	Support	<ul style="list-style-type: none"> • Additional employment opportunities • Additional holiday accommodation 	<ul style="list-style-type: none"> • Noted – Agreed • Noted – Agreed
37	Name & Address provided	Support	<ul style="list-style-type: none"> • Additional holiday accommodation • Increased general tourism 	<ul style="list-style-type: none"> • Noted – Agreed • Noted – Agreed
44	Name & Address provided	Support	<ul style="list-style-type: none"> • Increased accommodation for tourists • Accommodation for crew & participants of events • Accommodation for short term employees of businesses in need of temporary staff • Less destruction to bushland & environment by having visitors in a designated area 	<ul style="list-style-type: none"> • Noted – Agreed • Noted – Agreed • Noted – Agreed • Noted – Agreed <p>The proposal aims to renovate an existing farm shed so as to maintain its rustic appearance while offering a Function/Activity</p>

				<p>Facility able to be used by visitors. The proposed Function/ Activity Facility and Ablution Block are to be located on cleared land. The Camping Ground is located on land that is predominantly cleared but contains parkland trees (that will be retained to provide shade and amenity for visitors) and areas of bracken. Removal of some bracken and pruning of trees within the camping ground area will be required for the camping area. The proposed land uses will be setback behind the existing ornamental vineyard that buffers it from Jalbarragup Road. Therefore minimal impact on the existing environment will occur in context with this proposal.</p>
52	Name & Address provided	Support	<ul style="list-style-type: none"> • Additional accommodation for tourists & during events • Possibility of community uses of function centre 	<ul style="list-style-type: none"> • Noted – Agreed • Noted – Agreed
59	Name & Address provided	Support	<ul style="list-style-type: none"> • Would reduce informal/illegal camping along the river bank 	<ul style="list-style-type: none"> • Noted – Agreed <p>The proposed camping ground provides an affordable form of accommodation for visitors to camp and explore the region. It also complements the existing chalet/cabin land use/ development offering on the land as well as on nearby properties.</p>
62	Name & Address provided	Support	<ul style="list-style-type: none"> • Additional accommodation options for tourists • Amenity of the area needs to be retained with control of noise, fire & waste management 	<ul style="list-style-type: none"> • Noted – Agreed • Noted – Agreed <p>Refer to comments provided for Submission 22 above. Matter relating to noise, fire and waste management can be addressed through the license issued under the Caravan and Camping Regulations)</p>
1	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Increased noise • Increased rubbish 	<ul style="list-style-type: none"> • Noise generated from the Camping Ground and Function /Activity Facility will be negligible noting the number of camping sites being limited to 25 and any functions will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA) • Noise and waste can also be managed in line with a license issued under the Caravan Parks and Camping Ground Act 1995 and associated Caravan Parks and Camping Regulations 1997.

			<ul style="list-style-type: none"> • Transient people would impact community network • Road safety issues • Environmental impacts 	<ul style="list-style-type: none"> • Noted – subjective comment disagree. The Shire of Nannup Local Planning Strategy outlines, as part of its Community Strategic Plan, the Shire/community working together to attract people to their amazing Shire. Providing a low cost accommodation option to the region would support a variety of people (including families, couples and travellers) to visit and explore the area. <p>Providing a Function/Activity Facility will enable to the upgraded shed to be used by both camp visitors and community groups in the locality.</p> <ul style="list-style-type: none"> • Noted – Disagree. The increase in vehicle movements is considered negligible and well within the capacity of the road function. The proposal will use the same driveway entrance from Jalbarragup Road. No road traffic issues are therefore envisaged. • Noted – Disagree. The camping and ablution facility (and associated effluent disposal system) is to be located on cleared land located greater than 100m from Blackwood River. The existing shed is proposed to be refurbished to be used for a function/activity room
2	Name & Address provided	Oppose	<ul style="list-style-type: none"> • No zoning merit 	<ul style="list-style-type: none"> • Noted – Disagree - The land is zoned 'Rural' in the Shire of Nannup Local Planning Scheme No.4 ('the Scheme'). A proposed Camping Ground is a permissible 'A' Land Use in the 'Rural' zone. Furthermore a Function / Activity Room could reasonably be construed as a Reception Centre – which is also a permissible 'A' Land Use in the 'Rural' zone. This means that the Council can exercise its discretion by granting development approval after advertising in accordance with clause 64 of the Deemed Provisions. The Ablution Block is considered to be incidental to the Camping Ground and Function/Activity Room land uses. For the majority of the time, the Function/Activity room will serve as a building for communal and recreational activities linked with camping ground visitors - hence it would serve to be incidental to the predominant use of Camping Ground.

		<ul style="list-style-type: none"> • Application doesn't address bushfire risks • Application doesn't address access • Application doesn't address potable water supply • Application doesn't address sewerage requirements • Increased noise • Increased crime • Will there be future needs for kiosk, fuel store etc 	<ul style="list-style-type: none"> • Noted - Disagree – Refer to Fire Consultant - Ecosystem Solutions Bushfire Management Plan and their response to the DFES submission clearly demonstrating the BMP has addressed all bushfire risk matters. • Access is clearly shown on the updated Site Plan linking the proposed camping ground and function facility directly on to Jalbarragup Road – which provides two separate exit options running north and south of the land. • Water to the ablution facilities and Function/Activity facility will be provided via water supplied from roof catchment off the existing shed and drawn from two existing bores located on the property. • The ablution facility has been included with the proposal. The proponent has been in discussions with Council’s environmental Health officers and confirms that there is ample area to locate a suitably sized effluent system to accommodate the number of people camping or visiting the property on cleared land and setback greater than 100m from the Blackwood River. • Noted - Refer to response provided at Submission 1 and 22 above. • Noted - Disagree – Subjective comment – falls outside the Town Planning Framework - Crime is not considered a valid planning consideration in context to this proposal as it is highly subjective in referring to the behaviour of people camping or using the Function/Activity Facility. Crime is more so a community matter considered under separate legislation that is not guided by the approval of a Camping Ground and Function/Activity Facility on the property. • Noted - Not relevant – as these incidental land uses do not form part of the application
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			<ul style="list-style-type: none"> • Extra traffic 	<ul style="list-style-type: none"> • Noted – refer to response provided at Submission 22 above
3	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Property is not zoned for a caravan park • Increased rubbish • Increased human waste • Access & egress to the area would be inadequate • Extra traffic would be detrimental to the peace of the area • Security would be put at risk by increased visiting Population • Noise generated would be detrimental to the peace of the area 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 2 above • Noted - Refer to response provided at Submission 1 above • Noted - Refer to response provided at Submission 2 above • Noted – Disagree - The driveway and access crossover can be designed to comply with engineering and Bushfire Management Plan standards to accommodate the traffic demand from the proposal. • Noted – Disagree - Refer to response provided at Submission 1 above. • Noted – Subjective comment – falls outside the Town Planning Framework. Refer to response provided at Submission 2 above. The Camping Ground and Function /Activity Room will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA) • Noted – Disagree - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise.
4	Name & Address provided	Oppose	<ul style="list-style-type: none"> • No waste management collection facilities in the area 	<ul style="list-style-type: none"> • Noted - Waste or rubbish collection can be managed in line with a license issued under the Caravan Parks and Camping Ground Act 1995 and associated Caravan Parks and Camping Regulations 1997. The Council may also seek the preparation and approval of a Waste Management Plan as a condition of Development Approval

			<ul style="list-style-type: none"> • Communications tower would not support visitor numbers • Grid power may be affected • Security of existing residents' properties • Road upgrades may be required due to increased traffic • Secure bushfire exits not available for quick exit • Degradation of peaceful enjoyment of the area 	<ul style="list-style-type: none"> • Noted – Disagree - The proponent confirms that the reception provided at the property has excellent coverage from the mobile phone tower nearby. • Reticulated Power supply is already provided to the property. Any upgrades to the power supply will accord with the minimum standards for the land uses proposed • Noted – Disagree - Subjective comment – falls outside the Town Planning Framework. Refer to response provided at Submission 3 above • Noted – Disagree - Jalbarragup Road fronting the property is constructed to a sealed standard considered adequate to accommodate additional vehicles accessing/egressing the 25 Camping Ground sites and the Function/Activity Room when being used. Council’s technical Services Department confirms the existing road is constructed to a safe standard for the locality. • Noted – disagree - The Bushfire Management Plan outlines that the private driveway provides emergency egress and access for all patrons and staff, in the event of a bushfire. The driveway is approximately 180 m in length and will comply with the technical requirements of the Guidelines. Furthermore, the Bushfire Emergency Evacuation Plan includes requirements to install a map depicting the emergency evacuation routes. • Noted – Disagree - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise
5	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Informed that there would be no further development in Jalbarragup 	<ul style="list-style-type: none"> • Noted – To clarify, the Shire of Nannup Local Planning Strategy states - ‘rural residential’ areas at Jalbarragup and Darradup where no further subdivision will be supported’. This proposal

			<ul style="list-style-type: none"> • Property not zoned for development of function room, large caravan & camping park • Amount of general & human waste could damage the environment • Extra traffic would be an accident waiting to happen • Noise would be detrimental to the area's peace & tranquillity • Safety & security would be put at risk from visitors • Fire safety would become a major risk due to poor fire exits 	<p>is seeking approval for land uses/development for a Camping Ground, Function/Activity Facility/Room and supporting Ablution Block able to be considered within the 'Rural' zone. This proposal does not refer to rural residential subdivision.</p> <ul style="list-style-type: none"> • Noted – disagree - Refer to response provided at Submission 2 above with regard to zoning. 25 camping sites is considered to be a small caravan/camping land use that draws on the parkland cleared attraction of the property to provide a low cost short stay accommodation option within a rural setting. • Noted-disagree - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted – disagree - Subjective comment. This is a subjective comment as vehicle accidents are often guided by the behaviour of drivers, not the proposed land use on the property. • Noted – disagree - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – disagree – subjective comment - falls outside the Town Planning Framework and therefore not relevant - Refer to response provided at Submission 2 above. The Camping Ground and Function /Activity Room will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA) • Noted – disagree - Refer to response provided at Submission 4 above relating to emergency access and egress.
6	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Informed that there would be no further development in Jalbarragup 	<ul style="list-style-type: none"> • Noted – To clarify, the Shire of Nannup Local Planning Strategy states - 'rural residential' areas at Jalbarragup and Darradup where no further subdivision will be supported'. This proposal is seeking approval for land uses/development for a Camping Ground, Function/Activity Facility/Room and a supporting ablution block able to be considered within the 'Rural' zone. This

		<ul style="list-style-type: none"> • Amount of general & human waste could damage the environment • Safety & security would be put at risk from visitors • Visitors lighting fires at the river would be a major hazard • Increased use of the river by motorised craft causing extra noise 	<p>proposal does not refer to rural residential subdivision.</p> <ul style="list-style-type: none"> • Noted-Disagree - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater • Noted – disagree - subjective comment - falls outside the Town Planning Framework and therefore not relevant - Refer to response provided at Submission 2 above. The Camping Ground and Function /Activity Room will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA) • Noted – subjective comment - falls outside the Town Planning Framework and therefore not relevant to the proposal. <p>Any intent to light fires within the Blackwood River foreshore reserve should be guided by the relevant authority managing that reserve.</p> <p>The operator /manager will ensure that appropriate arrangements are in place at all times for the Bushfire Management Plan and the Bushfire Emergency Evacuation Plan is complied with on the property. This will include installing the Emergency Evacuation Diagram on the inside face of all external doors, ensuring it is clearly visible to occupants and the manager/operator conducting seasonal and daily preparation for bushfire season to make sure visitors are kept informed and familiar with evacuation requirements. The lighting of fires will also be guided by the Council’s Firebreak and fire ban notices.</p> <ul style="list-style-type: none"> • Noted - subjective comment - falls outside the Town Planning Framework and therefore not relevant to the proposal on the land. <p>It is not clear what the proportion of camping visitors will be visiting the area to use motorised craft. The majority of visitors</p>
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				are likely to be via vehicles with tents or camper trailers to the site. The proportion of visitors likely to bring motorised craft would therefore be negligible.
7	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Not consistent with LPS C74 • Road access may not support timely evacuation • Development of a caravan park could be said to approximate residential infill. • Increased traffic on Stacey Rd may impact road safety 	<ul style="list-style-type: none"> • Noted - Not sure what this comment is referring to as Clause 74 of the Scheme refer to Land Use definitions. The proposed land uses are clearly defined and are able to be considered in the 'Rural' zone. • Noted – disagree - Refer to response provided at Submission 4 above relating to emergency access and egress. • Noted –disagree. This is not a residential infill proposal. It proposes affordable short stay accommodation in the form of camping in a rural setting. 'Residential' type housing is not being proposed. • Noted – Disagree- Refer to response provided at Submission 22 above relating to Stacey Road and the very low traffic use of Jalbarragup Road.
8	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Caravan park & function centre better suited to town • Increased traffic & visitation to the area 	<ul style="list-style-type: none"> • Noted – Disagree - There are many examples where caravan and camping short stay affordable accommodation has been provided on 'Rural' zoned land, National Parks and Class A Reserves. <p>Short stay affordable accommodation as proposed offers a point of difference where visitors want to stay in rural and natural settings and be self-sufficient.</p> <ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 relating to the Shire of Nannup Local Planning Strategy outlines, as part of its Community Strategic Plan, the Shire/community working together to attract people to their amazing Shire. Also refer to response provided at Submission 22 above relating the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal.

			<ul style="list-style-type: none"> • Location is not a playground for the wider population • Potential damage to surrounding native bush & fauna • Objects to implementation of any new infrastructure 	<ul style="list-style-type: none"> • Noted – The application isn’t proposing a playground! It’s proposing affordable short stay accommodation option in the form of Camping and a Function/Activity room able to be used by the wider community as and when required. • Noted – Disagree – subjective comment - This comment is subjective and not relevant to the proposal on the land. The proposal is to be located on cleared land where minor removal of bracken and pruning of trees may be required for the Camping sites. • Noted – Relevant infrastructure to support the proposed camping ground and function centre would not be outside the realms that provided for other short stay land uses in Rural areas. Power is already provided to the property.
9	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Increased traffic creating risk to local traffic & wildlife • Increase volume of people & vehicles using limited escape routes during a fire emergency • Grocery shops or eating venues in the area creating additional trips to & from the area by visitors. • Increase effluent which would leach into the river • Impact of additional visitors on local swimming & socialising spot at Jalbarragup Bridge 	<ul style="list-style-type: none"> • Noted – Disagree - Refer to response provided at Submission 22 above relating the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – disagree - Refer to response provided at Submission 4 above relating to emergency access and egress. <p>Noted – additional trips to shops and eating venues would be negligible by reason that the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation has been provided on “Rural’ land, National Parks and Class A Reserves located away from town sites.</p> <ul style="list-style-type: none"> • Noted – disagree -Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - A subjective comment and not a key planning consideration in context to the merits of this proposal.

			<ul style="list-style-type: none"> Increased noise 	<p>The Blackwood River and its surrounds falls within a public reserve which is available for the public to use/enjoy and can be suitably managed by relevant government agency in terms of recreation function, access and rubbish collection etc.</p> <ul style="list-style-type: none"> Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise
11	Name & Address provided	Oppose	<ul style="list-style-type: none"> Significant impact on wildlife & flora Increased traffic on narrow roads Noise pollution Rubbish left at local swimming holes 	<ul style="list-style-type: none"> Noted – disagree – Refer to response provided at Submission 44 above. Noted - Refer to response provided at Submission 22 above relating the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. <p>While the condition of Jalbarragup Road is already constructed to a suitable standard, Council’s Technical Services officer further confirmed that the portion of Jallbarragup Road fronting the land will see the existing sealed road being upgraded to a 6.2m wide seal – further improving the safety of the road.</p> <ul style="list-style-type: none"> Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. Noted - A subjective comment and not a key town planning consideration in context to the merits of this proposal on private land. Provision of rubbish bins and notification by relevant government agency would assist in minimising rubbish left at the local swimming holes or along the foreshore reserve

12	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Concerned about precedent • Increased noise • Increased traffic • Increased recreational use of the river • Increased pollution of the river • Risk of visitors roaming into private property • Higher fire risk 	<ul style="list-style-type: none"> • Noted – the proposed Camping Ground, Function /Activity Room and Ablution Block should be considered on its own merit in context with its permissibility as set out in Council’s Scheme. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted - Refer to response provided at Submission 22 above relating the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted - A subjective comment and not a key town planning consideration in context to the merits of this proposal on private land. Refer to response provided at Submission 9 above relating to impact from additional visitors on local swimming & socialising spot at Jalbarragup Bridge • Noted – disagree - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted – disagree- A subjective comment and not a key planning consideration in context to the merits of this proposal. • Noted – The operator /manager will ensure that appropriate arrangements are in place at all times for the Bushfire Management Plan and the Bushfire Emergency Evacuation Plan is complied with on the property. This will include installing the Emergency Evacuation Diagram on the inside face of all external doors, ensuring it is clearly visible to occupants and the manager/operator conducting seasonal and daily preparation for bushfire season to make sure visitors are kept informed and familiar with evacuation requirements. The lighting of fires will also be guided by the Council’s Firebreak Notice and fire ban notices where lighting of fires will be guided by. Any intent to light fires within the Blackwood River foreshore reserve should also be guided by the relevant authority managing that reserve.
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			<ul style="list-style-type: none"> • Additional loading on mobile phone tower • Consideration of issues relating to heritage-listed property 	<ul style="list-style-type: none"> • Noted – Disagree - The proponent confirms that the reception provided at the property is clearly adequate in making and receiving calls to the locality, where it has excellent coverage from the mobile phone tower nearby. • Noted – disagree. The proposal will not impact any heritage listed structures located on the property or nearby.
13	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Increased traffic causing dust • Increased rubbish around river • Increased fire risk due to illegal camp fires 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – Refer to response provided at Submission 11 above relating to rubbish left at local swimming holes. • Noted – disagree - A subjective comment and not a key planning consideration in context to the merits of this proposal. Refer to response provided at Submission 12 above relating to higher fire risk.
14	Name provided	Oppose	<ul style="list-style-type: none"> • Camping area is too close to the river • Increased noise pollution • Light pollution at night 	<ul style="list-style-type: none"> • Noted – Disagree - The proposed Camping area aims to utilise existing parkland cleared trees to provide shade and landscape amenity for visitors. Areas of remnant vegetation within the foreshore reserve and the property itself will significantly screen the camping area from the river. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – minimum lighting requirements will be guided by the Caravan and Camping Regulations 1997. This will detail the minimum light requirements surrounding the ablution block to provide visitors to have sufficient visibility to access egress the ablution block or function /activity room at night. <p>The camping area is located in an area where camping lights will be screened by existing vegetation and is substantially setback to</p>

			<ul style="list-style-type: none"> Increased visitors will have detrimental impact on the environment & fauna Incompatibility of blue gum plantation & camping Unsuitable fire evacuation routes Unsuitability of local roads for increased & caravan traffic Potential sale/distribution of liquor Welfare risk to patrons attending function centre at night 	<p>other Rural Residential and Rural zoned landholdings. Hence the the type of lighting required will not impact the amenity of nearby landowners.</p> <ul style="list-style-type: none"> Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. Noted – Disagree - The blue gum plantation is located at least 50m south of the proposed Function /Activity room and Ablution Block and separated by the primary driveway entry that is lined by ornamental trees – which provides an ideal setting for the land uses proposed. Noted – disagree - Refer to response provided at Submission 4 above relating to emergency access and egress. Noted - disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. Noted – A subjective comment and not a key planning consideration in context to the merits of this proposal. Not relevant as it is a speculative comment and does not form part of the proposal being considered. Noted – Not sure what this comment is referring to. However the proponent does not see there to be any welfare risk, but on the contrary provides for positive opportunities for the function/activity room to be used by the community and/or visitors to the area.
16	Name & Address provided	Oppose	<ul style="list-style-type: none"> Possible leaching if waste into river ecosystem & overuse Visual aesthetics 	<ul style="list-style-type: none"> Noted – disagree - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. Noted – The conversion of the existing Shed to a Function / Activity Room will utilise the façade of the existing shed which is considered suitable for the ‘Rural’ zone and will ensure the structure remains in keeping with the rural amenity of the area.

			<ul style="list-style-type: none"> • Increased traffic • Noise pollution • Additional loading on mobile phone tower • Unsuitable fire evacuation routes • No benefit to the community in general 	<p>Furthermore, the proposed Function/Activity Room is setback more than 130m and will screen the ablution block from Jalbarragup Road. The Camping ground will also be suitably screened from Jalbarragup Road by existing parkland trees and the ornamental vineyard.</p> <ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – Disagree - The proponent confirms that the reception provided at the property has excellent coverage from the mobile phone tower nearby • Noted – disagree - Refer to response provided at Submission 4 above relating to emergency access and egress. • Noted – disagree - The Shire of Nannup Local Planning Strategy outlines, as part of its Community Strategic Plan, the Shire/community working together to attract people to their amazing Shire. Providing a low cost accommodation option to the region would support a variety of people (including families, couples and travellers) to visit and explore the area. <p>The Shire Local Planning Strategy also aims to encourage a wide range of tourism and recreational facilities, tourist accommodation and activities for visitors in the rural areas of the Shire.</p> <p>The Council would also support opportunities for proposals that may require employment of local people and also a venue in which to hold functions that would also benefit the community.</p>
17	Name &	Oppose	<ul style="list-style-type: none"> • Increased noise 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 and 22

	Address provided		<ul style="list-style-type: none"> • Reduction in privacy to nearby property owners • Trespass • Potential clearing of native trees & loss of cockatoo habitat • Lack of adequate water supply, possible draw from river • No wastewater management information • Increased risk of fires • Unsuitable fire evacuation routes 	<p>above relating to matters relating to noise.</p> <ul style="list-style-type: none"> • Noted – disagree- Refer to response provided at Submission 2 above. The Camping Ground and Function /Activity Room will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA). The camping ground will also need to be managed in line with a license issued under the caravan Parks and camping Grounds Act 1995 and associated Caravan parks and camping Grounds Regulations 1997. • Noted – A subjective comment and not a key planning consideration in context to the merits of this proposal. Not considered relevant. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Noted - Water to the ablution facilities and Function/Activity facility will be provided via water supplied from roof catchment off existing structure and via 2 existing bores located on the property. Water will not be drawn from the river. • Noted – Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - Refer to Fire Consultant - Ecosystem Solutions Bushfire Management Plan and their response to the DFES submission clearly demonstrating the BMP has addressed all bushfire risk matters. • Noted - Refer to response provided at Submission 4 above relating to emergency access and egress.
18	Name &	Oppose	<ul style="list-style-type: none"> • Jalbarragup Rd is unsuitable as an evacuation route for 	<ul style="list-style-type: none"> • Noted – disagree - The submitted Bushfire Management Plan

	Address provided	<p>caravans & visitors</p> <ul style="list-style-type: none">• Proximity to the river would increase environmental risk• Plan is not consistent with current Jalbarragup Establishment	<p>confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas.</p> <ul style="list-style-type: none">• Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment.• Noted – disagree - Camping short stay affordable accommodation is, along with other forms of short stay accommodation, permissible within the 'Rural' zone. The proposed combination of short stay affordable accommodation and a function/Activity room will offer a point of difference where visitors want to stay in rural and natural setting while allowing for functions that could be used by the visitors or the community.
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19	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Local Planning Strategy states no further development will take place in Jalbarragup • Increase in traffic is an accident waiting to happen • Unsuitable evacuation routes • Stress on the river & Leederville aquifer by septic system leaching & general waste • Excess noise • No clarification as whether sites are long or short stay 	<ul style="list-style-type: none"> • Noted – To clarify, the Shire of Nannup Local Planning Strategy states - <i>'rural residential' areas at Jalbarragup and Darradup where no further subdivision will be supported'</i>. This proposal is seeking approval for land uses/development for a Camping Ground, function/activity room and supporting ablution block able to be considered within the 'Rural' zone. This proposal does not refer to rural residential subdivision. • Noted –disagree - This is subjective comment and not a key planning consideration in context to the merits of this proposal. Not considered relevant. Vehicle accidents are often guided by the behaviour of drivers, not the proposed land use the subject of this application. • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas and provides two separate evacuation directions able to be used in the event of a fire. • Noted – disagree - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - Refer to response provided at Submission 1 and 22 above • The proposed camping ground will be for short stay accommodation purposes.
23	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Will detract from general visual appeal of the area • More campsite may be requested later, approving may set 	<ul style="list-style-type: none"> • Noted – Refer to response provided at Submission 16 above relating to Visual aesthetics • Noted – Considered irrelevant as it is a speculative comment and

		<p>a precedent for more</p> <ul style="list-style-type: none">• Traffic impacts• Increased risk of anti-social behaviour• Development of this type not supported by Local Planning Strategy• Risk of possible erosion of the riverbank & environmental disaster	<p>does not form part of the proposal being considered.</p> <ul style="list-style-type: none">• Noted – Disagree – Refer to response provided at Submission 22 above relating the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. No road traffic issues are therefore envisaged.• Noted – This is a highly subjective comment and not a key planning consideration in context to the merits of this proposal . <p>It is important to note that the Camping Ground and Function /Activity Room will be managed according to guidelines as proposed by Shire Policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA). The camping ground will also need to be managed in line with a license issued under the caravan Parks and camping Grounds Act 1995 and associated Caravan parks and camping Grounds Regulations 1997.</p> <ul style="list-style-type: none">• Noted - disagree – On the contrary, the Local Planning Strategy states that it aims to <i>'encourage the development of a wide range of tourist and recreation facilities, tourist accommodation and activities for visitors in appropriate locations in the rural areas of the Shire that appropriately address bushfire planning, environmental assets, landscape qualities and compatibility with adjoining land uses'</i>. <p>This proposal will provide for low cost short stay accommodation for visitors and offer a Function/Activity Room able to be utilised by the community and/or visitors that ensures the use and development are managed, located, designed and sited in a manner that conserves and enhances environmental assets and landscape qualities.</p> <ul style="list-style-type: none">• Noted – disagree – The siting of the proposed camping ground, Function Centre and Ablution facility is significantly setback from the riverbank and located within privately owned land.
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			<ul style="list-style-type: none"> • Degradation of mobile coverage for local residents • Impact on Nannup Caravan Park • Should be a study to show there is demand for this development 	<ul style="list-style-type: none"> • Noted – disagree - The proponent confirms that the reception provided at the property has excellent coverage from the mobile phone tower nearby • Noted – disagree – On the contrary the proposal provides for a camping ground accommodation offering in Jalbarragup within a rural setting. It therefore offers a point of difference. • Noted – The proposed land uses can be considered within the ‘Rural’ zone in Council’ Scheme and represents a tourist use encouraged in the Shire of Nannup local Planning Strategy. No study is required.
24	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Poor planning merits by way of traffic generation, noise, disturbance and road access 	<ul style="list-style-type: none"> • Noted – Disagree - refer to response to submission 1 and 22 relating to traffic generation and noise as well as response to submission 4 above relating to emergency access and egress.
26	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Jalbarragup has little services to support tourism • There is already a caravan park in Nannup • Unsealed Jalbarragup Rd would pose safety concerns if caravans were to use it regularly • There are other quiet camping site in the Shire • There would be an influx of extra people into a small, quiet 	<ul style="list-style-type: none"> • Noted – Disagree - The proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation has been provided on “Rural’ land, National Parks and Class A Reserves located away from town sites. • Noted - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on “Rural’ land, National Parks and Class A Reserves located away from town sites. • Noted - disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – camping sites in rural areas (as proposed) offer accommodation within a rural setting. • Noted – disagree. The proposed camping ground is limited to 25

			community	sites which is considered a low key tourist accommodation offering which will provide a marginal increase in visitors to the area.
27	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Allowing caravan park will invite unwanted people • Increased noise • Increased rubbish • Possible effect on local watering hole 	<ul style="list-style-type: none"> • Noted – disagree – This is a highly subjective comment and not a key planning consideration in context to the merits of this proposal . Refer to response to Submission 23 above relating anti-social behaviour. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted - Refer to response provided at Submission 1 above relating to rubbish management. • Noted – disagree – Irrelevant noting that the siting of the proposed camping ground, Function Centre and Ablution facility is significantly setback from the riverbank and located within privately owned land.
28	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Development is the wrong fit for the area • Roads & bridge are not wide enough for large vehicles towing caravans • Impact on river & public access points to the riverbank 	<ul style="list-style-type: none"> • Noted – disagree - Refer to response provided at Submission 23 above relating to the proposal reflecting the key aim of the Shire’s Local Planning Strategy to encourage the development of a wide range of tourist and recreation facilities, tourist accommodation and activities for visitors in appropriate locations in the rural areas of the Shire. • Noted - disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. Also refer to response provided at Submission 9 above relating to additional visitors on local swimming & socialising spot at Jalbarragup Bridge.
29	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Development will be an eyesore 	<ul style="list-style-type: none"> • Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics

			<ul style="list-style-type: none"> • Potential decrease in property values • Leaching of waste into Leederville aquifer & river • Increased traffic would be an accident waiting to happen • Possible long term tenants due to rental housing shortage • Local Planning Strategy states there will be no further development in Jalbarragup • Unsuitable evacuation routes 	<ul style="list-style-type: none"> • Noted – Not considered a valid planning argument • Noted – disagree - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted – disagree - This is a subjective comment and not a key planning consideration in context to the merits of this proposal on private land. Vehicle accidents are often guided by the behaviour of drivers, not the land uses proposed under this application. • Noted – disagree – a speculative comment noting that the proposed camping ground will be for short stay accommodation purposes. • Noted – disagree – Please refer to response provided at Submission 19 relating to no further rural residential subdivision not being supported in Jalbarragup. • Noted - disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas.
30	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Impact on peaceful, quiet lifestyle • Impact on visual amenity 	<ul style="list-style-type: none"> • Noted - Disagree - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics.
32	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Negative environmental impact via noise, pollution & increased risk of bushfire • Increased security risks such as trespass & theft 	<ul style="list-style-type: none"> • Noted –Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. Also refer to response provided at Submission 2 above with regard to addressing on-site wastewater and the Bushfire Management Plan (including their response to the DFES submission) clearly demonstrating the BMP has addressed all bushfire risk matters. • Noted – disagree – This is a subjective comment and not a key planning consideration in context to the merits of this proposal on private land. Refer to response provided at Submission 1 relating to crime.

			<ul style="list-style-type: none"> • Increased demand for emergency response • No benefit to the Jalbarragup community 	<ul style="list-style-type: none"> • Noted – disagree – This is a subjective comment and not a key planning consideration in context to the merits of this proposal on private land. Any requirement for emergency services will be dependent on the type of emergency needing to be attended to and may very well <u>not</u> be related to the visitors accessing the land uses proposed. • Noted - disagree – Refer to response provided at Submission 16 relating to benefit to the community in general and the Shire’s Community Strategic Plan for the Shire/community working together to attract people to their amazing Shire.
33	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Proposed development will change the characteristics & appeal of the area • No benefit to the Jalbarragup community 	<ul style="list-style-type: none"> • Noted – disagree - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. Also refer to response provided at Submission 16 relating to visual aesthetics • Noted - disagree – Refer to response provided at Submission 16 relating to benefit to the community in general and the Shire’s Community Strategic Plan for the Shire/community working together to attract people to their amazing Shire.

34	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Proposed development is contrary to the peace & tranquillity of the area. Increased noise • Poses a threat to the lifestyle of residents & ratepayers • Loss of amenity • Increased risk to wildlife & the environment • Increased anti-social behaviour, theft, trespass • Increased rubbish 	<ul style="list-style-type: none"> • Noted – disagree - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – disagree – the proposed land use pose no significant threat to the lifestyle whatsoever. • Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Noted – disagree – Reference to anti-social behaviour is a highly subjective comment and not a relevant planning consideration in context to the merits of this proposal on private land. Refer to response provided at Submission 1 relating to crime. • Noted - Refer to response provided at Submission 1 above
35	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Proposed location does not support a development of this size • Road safety issues on Stacey Rd /Increased traffic • Unsuitable fire evacuation routes 	<ul style="list-style-type: none"> • Noted- disagree – The proposal is limited to 25 camping sites, a Function /Activity room and supporting Ablution Block. The range of tourism land uses is considered a low key type of land use, which will not see any significant change to the rural setting it is located within. • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal that also relates to Stacey Road. • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas.
36	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Proposed development is in a high fire risk area 	<ul style="list-style-type: none"> • Noted - Refer to Fire Consultant - Ecosystem Solutions Bushfire Management Plan and their response to the DFES submission clearly demonstrating the BMP has addressed all bushfire risk matters.

		<ul style="list-style-type: none"> • Unsuitable fire evacuation routes • Road safety risks due to increased traffic/Increased noise & congestion • Will ablution facilities be able to cope with proposed full capacity/ Leaching of wastewater into river • Increased noise • Increased rubbish 	<ul style="list-style-type: none"> • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas. • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. <p>The traffic volumes demonstrate there will not be any traffic congestion along Jalbarragup Road.</p> • Noted –disagree – Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted - Refer to response provided at Submission 1 above relating to management of rubbish from the proposal
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38	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Increased traffic • Increase noise • Increased rubbish & pollution • There are already two caravan parks in Nannup 	<ul style="list-style-type: none"> • Noted – Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted - Refer to response provided at Submission 1 above relating to management of rubbish from the proposal. • Noted - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on “Rural’ land, National Parks and Class A Reserves located away from town sites. It offers a point of difference in providing low cost camping accommodation within a rural setting.
39	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Increased noise pollution • Increased traffic • Lack of water supply • Risk to native endangered wildlife • Pollution due to sewerage, litter & other chemicals • Increased bushfire risk 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted – Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted - Water to the ablution facilities and Function/Activity facility will be provided via water supplied from roof catchment off existing structure and 2 existing bores on the property. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Noted –disagree – Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - Refer to Fire Consultant - Ecosystem Solutions Bushfire Management Plan and their response to the DFES submission clearly demonstrating the BMP has addressed all bushfire risk

			<ul style="list-style-type: none"> • Increase wear & tear on local roads • Impact on peace & quiet due to increased visitor numbers 	<p>matters.</p> <ul style="list-style-type: none"> • Noted - As stated above the traffic use of Jalbarragup Road is very low, with only a negligible increase in traffic movements proposed from this this proposal. Road maintenance by Council would generally remain the same and within their schedule of works. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise.
40	Name provided	Oppose	<ul style="list-style-type: none"> • Will disturb the peace & tranquillity of the area • Limited evacuation routes from the area if there is a fire • Environmental concerns & impact on the river 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas and provides two separate evacuation directions able to be used in the event of a fire. • Noted - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater.
41	Name & Address provided	Oppose	<ul style="list-style-type: none"> • No further development was to occur in the area • Unsuitable fire evacuation routes • Increased traffic & road safety risks • No visitor parking or pedestrian access at Jalbarragup Bridge 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 19 above with regard to no further subdivision will take place in Jalbarragup. • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas and provides two separate evacuation directions able to be used in the event of a fire. • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – not a relevant matter in context with this proposal located on private land to be determined within the Town

			<ul style="list-style-type: none"> • Increased demand on mobile communications • Impact of sewerage disposal on the river • Lack of water supply • Increased noise & anti-social behaviour 	<p>Planning framework.</p> <ul style="list-style-type: none"> • Noted – Disagree - The proponent confirms that the reception provided at the property has excellent coverage from the mobile phone tower nearby. • Noted - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - Water to the ablution facilities and Function/Activity facility will be provided via water supplied from roof catchment off existing structure and 2 existing bores on the property. <p>Water will not be drawn from the river</p> <ul style="list-style-type: none"> • Noted – disagree – reference to anti-social behaviour is a subjective comment and not a key planning consideration in context to the merits of this proposal on private land. Refer and 22 above relating to matters relating to noise.
42	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Not enough car parking provided to transport everyone away in the event of a fire • No information about parking for camping/caravan sites • Unsuitable evacuation routes 	<ul style="list-style-type: none"> • Noted – completely disagree – The proposed Site Plan demonstrates a significant cleared area able to be used for parking, trafficable driveway surfaces + a turning circle for emergency vehicles to access/egress the water tank on site to be used for fire-fighting purposes. • Noted – Parking for each Camping Site is to be consistent with the requirement of the Caravan and Camping Regulations 1997 and Council’s Scheme. Information relating to parking is provide in the response to Submission and 22 above and has been indicatively shown on the Site Plan submitted with this response. • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas and provides two separate evacuation directions able to be used in the event of a fire.

			<ul style="list-style-type: none"> • Jalbarragup Bridge is unsuitable for use by people who do not know the area • No guidelines for management of noise & behaviour • Flood risk • Trespass risk • No water supply or waste disposal information provided 	<ul style="list-style-type: none"> • Noted – Refer to response provided at Submission 22 above relating the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. While the condition of Jalbarragup Road is already constructed to a suitable standard, Council’s Technical Services officer further confirmed that the portion of Jalbarragup Road fronting the land will see the existing sealed road being upgraded to a 6.2m wide seal – further improving the safety of the road. • Noted - Refer to response provided at Submission 1 and 22 above relating to on-site management of visitors. • Noted – Effluent disposal systems and structures are located greater than 100m from Blackwood River. Also refer to response to Submission 20 below in response to advice provided by Department of Water & Environmental Regulation. • Noted –disagree – a subjective comment and not a relevant planning consideration in context to the merits of this proposal on private land. Refer to response provided at Submission 1 relating to crime. • Noted – disagree - Water to the ablution facilities and Function/Activity facility will be provided via water supplied from roof catchment off existing structure and 2 existing bores on the property. Water will not be drawn from the river Noted - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater.
43	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Existing roads are not suitable for use by caravans & increased traffic 	<ul style="list-style-type: none"> • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas and provides two separate evacuation directions able to be used in the event of a fire.

			<ul style="list-style-type: none"> • Street lighting is inadequate • Area has no tourist attractions & does not need to cater for tourists • Negative impact on peace & tranquillity of the area/ Increased noise • Could impact property resale values • Visitors wandering around the neighbour & onto people's properties • Increased pollution • Damage to the environment • Excessive use of off-road vehicles & motorbikes 	<ul style="list-style-type: none"> • Noted – Don't require street lighting for these types of land uses. • Noted - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on "Rural" land, National Parks and Class A Reserves located away from town sites. It offers a point of difference in providing low cost camping accommodation within a rural setting. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted – Not considered a valid planning argument. • Noted –disagree – a subjective comment and not a relevant planning consideration in context to the merits of this proposal on private land. Refer to response provided at Submission 1 relating to crime. • Noted - Refer to response provided at Submission 2 above with regard to addressing on-site wastewater. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Noted - irrelevant to the proposal as it is making assumptions on the activities that camping visitors may undertake.
45	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Does not fit with the established character of the area 	<ul style="list-style-type: none"> • Noted - disagree - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on "Rural" land, National Parks and Class A Reserves located away from town sites. It offers a point of difference in

			<ul style="list-style-type: none"> • Does not sufficiently address waste & effluent management • Does not sufficiently address storm water management • Will increase load on the power grid for the area • Does not include adequate assessment of environmental impacts 	<p>providing low cost camping accommodation within a rural setting.</p> <ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Stormwater management can be addressed at the time of developing the land uses in line with conditional approval issued by the Shire. • Reticulated Power supply is already provided to the property. Any upgrades to the power supply will accord with the minimum standards for the land uses proposed. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment.
46	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Does not fit with the established character of the area • Does not sufficiently address waste & effluent management • Does not sufficiently address storm water management • Will increase load on the power grid for the area • Does not include adequate assessment of environmental impacts 	<ul style="list-style-type: none"> • Noted - disagree - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on “Rural’ land, National Parks and Class A Reserves located away from town sites. It offers a point of difference in providing low cost camping accommodation within a rural setting. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Stormwater management can be addressed at the time of developing the land uses in line with conditional approval issued by the Shire • Reticulated Power supply is already provided to the property. Any upgrades to the power supply will accord with the minimum standards for the land uses proposed • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment.

47	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Not consistent with the Local Planning Strategy /Will degrade the community values of Jalbarragup • Noise impacts on amenity • Traffic impacts & safety of road users • Detrimental impact on property values • Bushfire & environmental risks associated with development in an FZ rated bushfire zone 	<ul style="list-style-type: none"> • Noted – Disagree - The Shire of Nannup Local Planning Strategy outlines, as part of its Community Strategic Plan, the Shire/community working together to attract people to their amazing Shire. Providing a low cost accommodation option to the region would support a variety of people (including families, couples and travellers) to visit and explore the area. The Shire Local Planning Strategy also aims to encourage a wide range of tourism and recreational facilities, tourist accommodation and activities for visitors in the rural areas of the Shire. The Council would also support opportunities for proposals that may require employment of local people and also a venue in which to hold functions that would also benefit the community. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – Not considered a valid planning argument • Noted – The operator /manager will ensure that appropriate arrangements are in place at all times for the Bushfire Management Plan and the Bushfire Emergency Evacuation Plan is complied with on the property.
48	Name	Oppose	<ul style="list-style-type: none"> • Will disturb the peace & serenity of residents 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 and 22

	provided			above relating to matters relating to noise
49	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Would attract an array of people wanting to explore the area impacting the tranquillity • Impact on local sharing initiatives • Increased possibility of marron poaching & stealing firewood • Unsuitable fire evacuation routes • Increased risk of bushfire 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted – disagree – would not impact local sharing initiatives. • Noted – Irrelevant to considering the proposal in context with the Town Planning Framework – Separate laws control licensing for catching Marron • Noted – disagree - The submitted Bushfire Management Plan confirms Jalbarragup Road complies with the technical requirements in State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas and provides two separate evacuation directions able to be used in the event of a fire. • Noted – Refer to response provided at Submission 6 regarding the operator /manager ensuring that appropriate arrangements are in place at all times for the Bushfire Management Plan and the Bushfire Emergency Evacuation Plan is complied with on the property
50	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Increased traffic • Increased numbers of visitors • Impacts on bushland & wildlife 	<ul style="list-style-type: none"> • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – considered negligible in context with the number of camping sites being restricted to 25. Refer to Submission 22 • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment.
51	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Noise pollution • Increased risk for trespassing 	<ul style="list-style-type: none"> • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted –disagree – a subjective comment and not a relevant planning consideration in context to the merits of this proposal on private land. Refer to response provided at Submission 1 relating to crime.

- Invasion of privacy and Increased security risk
- Environmental implications
- Increased vehicular & foot traffic
- Use of fire breaks as vehicle routes
- Increased use of the river
- No police attendance
- Potential for increased feral pest activity
- Not consistent with Local Planning Strategy

- Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics.
- Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment.
- Noted – considered negligible in context with the number of camping sites being restricted to 25.
- Noted – access and parking can be controlled/managed on site
- Noted – irrelevant to the proposal as it is making assumptions on the activities that camping visitors may undertake.
- Noted – a subjective comment and not a relevant planning consideration in context to the Town Planning merits of this proposal on private land
- Noted – pest management can be undertaken as part of the management of the Camping Site and Function/Activity Room.
- Noted – disagree - The Shire of Nannup Local Planning Strategy outlines, as part of its Community Strategic Plan, the Shire/community working together to attract people to their amazing Shire. Providing a low cost accommodation option to the region would support a variety of people (including families, couples and travellers) to visit and explore the area.

The Shire Local Planning Strategy also aims to encourage a wide range of tourism and recreational facilities, tourist accommodation and activities for visitors in the rural areas of the Shire.

The Council would also support opportunities for proposals that may require employment of local people and also a venue in which to hold functions that would also benefit the community.

54	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Not in keeping with the Nannup vision of sustainability and historic nature • Potential for significant environmental damage • Does not fit with the established character of the area • Substantial impact on the privacy & peaceful lifestyle conducive to the residential area • Concerns with regards to crowd control, noise levels, drunk & tired drivers, disorderly conduct • Visual impact /Will make area considerably less pleasant • Traffic impacts & road safety concerns /Unsuitable traffic route along Jalbarragup Rd • Would require a convenience store and/or petrol station • Distance to medical attention or police 	<ul style="list-style-type: none"> • Noted –disagree – The proposed land uses are consistent with the aims of the Council’s Local Planning Strategy as set out in the response above. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Noted - disagree - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on “Rural’ land, National Parks and Class A Reserves located away from town sites. It offers a point of difference in providing low cost camping accommodation within a rural setting. • Noted – refer to response immediately above. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise • Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. • Noted – a subjective comment and not a relevant planning consideration in context to the Town Planning merits of this proposal - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient. • Noted – a subjective comment and not a relevant planning consideration in context to the Town Planning merits of this proposal on private land.
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			<ul style="list-style-type: none"> Limited internet & mobile communications 	<ul style="list-style-type: none"> Noted – disagree - The proponent confirms that the reception provided at the property has excellent coverage from the mobile phone tower nearby.
55	Name & Address provided	Oppose	<ul style="list-style-type: none"> Not in keeping with the Nannup vision of sustainability and historic nature Potential for significant environmental damage Does not fit with the established character of the area Substantial impact on the privacy & peaceful lifestyle conducive to the residential area Concerns with regards to crowd control, noise levels, drunk & tired drivers, disorderly conduct Visual impact/Will make area considerably less pleasant Traffic impacts & road safety concerns/Unsuitable traffic route along Jalbarragup Rd Would require a convenience store and/or petrol station 	<ul style="list-style-type: none"> Noted –disagree – The proposed land uses are consistent with the aims of the Council’s Local Planning Strategy as set out in the response to Submission 51 above. Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. Noted - disagree - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-sufficient – not dissimilar to many examples where caravan and camping short stay affordable accommodation approved and provided on “Rural’ land, National Parks and Class A Reserves located away from town sites. It offers a point of difference in providing low cost camping accommodation within a rural setting. Noted – refer to response immediately above. Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. Noted – a subjective comment and not a relevant planning consideration in context to the Town Planning merits of this proposal - the proposed form of short stay affordable accommodation (Camping) will likely see visitors being self-

			<ul style="list-style-type: none"> Distance to medical attention or police Limited internet & mobile communications 	<p>sufficient.</p> <ul style="list-style-type: none"> Noted – a subjective comment and not a relevant planning consideration in context to the Town Planning merits of this proposal on private land. Noted – disagree - The proponent confirms that the reception provided at the property has excellent coverage from the mobile phone tower nearby.
56	Name & Address provided	Oppose	<ul style="list-style-type: none"> Not consistent with development strategy for Jalbarragup Noise issues Pollution from waste & rubbish Security issues at private properties Use of firebreaks as access tracks 	<ul style="list-style-type: none"> Noted – Disagree - The Shire of Nannup Local Planning Strategy outlines, as part of its Community Strategic Plan, the Shire/community working together to attract people to their amazing Shire. Providing a low cost accommodation option to the region would support a variety of people (including families, couples and travellers) to visit and explore the area. <p>The Shire Local Planning Strategy also aims to encourage a wide range of tourism and recreational facilities, tourist accommodation and activities for visitors in the rural areas of the Shire.</p> <p>The Council would also support opportunities for proposals that may require employment of local people and also a venue in which to hold functions that would also benefit the community.</p> <ul style="list-style-type: none"> Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. Also refer to response provided at Submission 1 above relating to management of rubbish from the proposal Noted – completely disagree – refer to response provided at Submission 1 relating to crime. Noted – access and parking can be controlled/managed on site

			<ul style="list-style-type: none"> Limited internet availability Increased fire risk Increased traffic & reduced road conditions Increased police & emergency services requirements 	<ul style="list-style-type: none"> Noted – disagree - The proponent confirms that the reception provided at the property is clearly adequate in providing internet access from the property. Noted – Refer to response provided at Submission 6 regarding the operator /manager ensuring that appropriate arrangements are in place at all times for the Bushfire Management Plan and the Bushfire Emergency Evacuation Plan is complied with on the property Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. Noted –These are as needs services that should not be considered a significant planning consideration in context with the proposal.
57	Name & Address provided	Oppose	<ul style="list-style-type: none"> Not consistent with Local Planning Strategy or Local Planning Scheme No.3 Additional load on mobile communications & internet would impact residents Increased traffic & road safety issues 	<ul style="list-style-type: none"> Noted –disagree - Refer to response provided at Submission 56 above relating to the proposal being consistent with key aims and strategies on the Shire of Nannup Local Planning Strategy. Also refer to response provided at Submission 2 relating to the permissibility of the Camping Ground and Function/Activity Room being permissible land uses in the ‘Rural’ zone. <p>We note that the proposal will be considered under the recently gazetted Local planning Scheme No. 4 which has scope for proposed Camping Ground and Function Room to be approved within the ‘Rural’ zone.</p> <ul style="list-style-type: none"> Noted - The proponent confirms that the reception provided at the property is clearly adequate in making and receiving calls to and from the property. They also have good intent reception from the property. Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal.

			<ul style="list-style-type: none"> • Proposal would almost double Jalbarragup population when at capacity • Possible increased illegal camping in nearby bushland • Impacts on marron population & other environmental impacts • Local waterhole at Jalbarragup Bridge is likely to become a pseudo-extension to the proposed accommodation site • Increased littering • Visual impact • No reference made to flood risk and environmental impact that could be caused by development in the flood plain • No management plan for control of nuisances associated with the property 	<ul style="list-style-type: none"> • Noted – disagree – There are approximately 126 “Rural Residential” zoned lots + 30 ‘Rural’ zoned lots in the Jalbaraggup locality. The additional camping ground to accommodate 25 (even if we assumed 4 people per site at maximum capacity = 100) sites is significantly less than doubling the population of Jalbarragup. • Noted – a subjective comment and not considered a reasonable planning argument when this proposal is aiming to accommodate low cost camping accommodation on private ‘Rural’ zoned land. • Noted - Refer to response provided at Submission 44 above relating to matters relating to bushland and environment. • Noted – Not considered a relevant planning argument as it does not form part of this application on private land. • refer to response provided at Submission 1 above relating to management of rubbish from the proposal. • Noted – disagree – Refer to response provided at Submission 16 relating to visual aesthetics. • Development falls outside the flood plain area. I will need to check the DWER submission and discuss with them. • Noted - Refer to response provided at Submission 1 and 22 above relating to matters relating to noise
58	Name & Address provided	Oppose	<ul style="list-style-type: none"> • Impacts on peacefulness of the area • Local roads not suitable for increased traffic 	<ul style="list-style-type: none"> • Noted – Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. • Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal.
60	Name &	Oppose	<ul style="list-style-type: none"> • Increased traffic 	<ul style="list-style-type: none"> • Noted – disagree - Refer to response provided at Submission 22

	Address provided		<ul style="list-style-type: none"> Increased noise/Would impact the tranquillity of the area 	<p>above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal.</p> <ul style="list-style-type: none"> Noted – Refer to response provided at Submission 1 and 22 above relating to matters relating to noise.
61	Name & Address provided	Oppose	<ul style="list-style-type: none"> Inconsistent with surrounding land uses Local roads present safety issues/Increase traffic Increased noise Has no community benefit & will negatively impact volunteer community groups 	<ul style="list-style-type: none"> Noted – disagree - Refer to response provided at Submission 56 above relating to the proposal being consistent with key aims and strategies on the Shire of Nannup Local Planning Strategy. Also refer to response provided at Submission 2 relating to the permissibility of the Camping Ground and Function/Activity Room being permissible land uses in the ‘Rural’ zone. Noted – disagree - Refer to response provided at Submission 22 above relating to the very low traffic use of Jalbarragup Road and negligible increase in traffic movements from the proposal. Noted – Refer to response provided at Submission 1 and 22 above relating to matters relating to noise. <p>Noted - disagree – Refer to response provided at Submission 16 relating to benefit to the community in general and the Shire’s Community Strategic Plan for the Shire/community working together to attract people to their amazing Shire.</p>
15	John Patman Darradup VBFB	Advice	<p>Submission provided in full</p> <ul style="list-style-type: none"> To note that the Darradup Volunteer Bushfire Brigade (VBFB) is not equipped or trained to respond to commercial or tourism premises, or structural building fires. It is recommended that the Volunteer Fire & Rescue Service (VFRS) be consulted on responding to fire emergencies at the premise 	<ul style="list-style-type: none"> Noted – The Bushfire Management Plan (BMP) makes reference, as a Shire of Nannup Responsibility, for the Shire to develop and maintain district bushfire fighting services and facilities. Noted – This recommendation more so relates to training and equipment tasks that should be further considered within the Shire of Nannup from an overall fire response perspective. It is provided as advice and not considered to be an objection to the proposal.

- Jalbarragup Road (North of the development proposal to Mowen Road) is mostly gravel, and not considered by Fire Control Officer (FCO) to be 'wide, well- constructed public roads with 6m trafficable surface ' for evacuation route purposes.
- Darradup VBFB is not qualified to assess compliance of public roads referenced in the Bushfire Management Plan and Emergency Evacuation Plan to *The Guidelines for Planning in Bushfire Prone Areas* (WAPC, v1.4 December 2021) ('the Guidelines')
- As per the limitations statement '*Unless otherwise stated in the report, Ecosystem Solutions Pty Ltd has not independently verified such information and cannot guarantee its accuracy or completeness*'. No statement of independent verification of road standards for evacuation routes could be found in the provided documentation.
- It is recommended that the shire of Nannup Roads and Depot Services be consulted regarding this requirement.
- To note inconsistency between Bushfire management Plan

- Noted – disagree – It is agreed that road standards should be considered by the Shire of Nannup in in context with the statement made in the BMP that 'Jalbarragup Road is a public through road which provides access to two different directions to two different destinations.' Moreover, the BMP confirms that Jalbarragup Road complies with technical requirements described in Appendix C of the report.

We therefore consider the BMP clearly demonstrates that Jalbarragup Road complies with the acceptable solutions relating to public road access and the technical requirements set out under The Guidelines for Planning in Bushfire Prone Areas.

- Noted – We agree that Darradup VBFB is not qualified to assess compliance of public roads referenced in the Bushfire Management Plan and Emergency Evacuation Plan.
- Noted – Disagree – refer to response above.
- Noted – Agreed – The proposal should be assessed internally by Council's Technical Service Section in context with the submitted BMP which confirms 'compliance with the acceptable solution has been met' as per the Guidelines.

It should also be noted that the BMP includes, as a Shire of Nannup responsibility, that it maintain public roads in proximity to the Site according to the Guidelines. This is provided under Section 5 of the BMP.

- Noted - The proposed number of camping sites (powered and

and the development proposal scope, which references approximately 25 caravan sites (powered and unpowered) and a function room (150 – person capacity)

- The proposal is to establish nature-based campgrounds and a function room where an existing shed is located

To note inconsistency between Bushfire management Plan and the development proposal scope, which references approximately 25 caravan sites (powered and unpowered) and a function room (150 – person capacity)

- The following assumptions have been made:
 - The Site will be hosted.
 - Guests can see and smell smoke/fire and can read English language.
 - A vehicle/s with capacity for all occupants and licenced driver will be available at all times in case evacuation is required.

To note that ongoing compliance to these assumptions is unlikely in practice. For example, the proposed car park is estimated to provide 20 car park bays

- Recommend addition of the requirement for the landowner/occupier to promote education and awareness of bushfire prevention and preparation measures to guests.
The Guidelines for Planning in Bushfire Prone Areas (WAPC, v1.4 December 2021) outline that camping grounds are a ‘vulnerable land use’. This includes uses such as short stay accommodation or visitation uses, that involve people who unaware of their surroundings , who may require assistance or direction in the event of a

unpowered is approximately 25. The BMP can be adjusted to reflect this figure.

- Noted – To provide clarity, an updated Site Plan has been prepared to scale and submitted in response to the submissions to clearly show the position of the camping area, the ablution block and conversion of the existing shed to a function/activity room.

The site plan can be provided to the fire consultant for reference purposes. The updated Site Plan will maintain the BMP’s conclusion that the proposal is able to comply with all acceptable solutions of the Guidelines.

- Noted – disagree - The proposal will be guided by requirements of the BMP and Bushfire Emergency Evacuation Plan. All these assumptions are considered reasonable, particularly given that the proponent and or their employee/s will be on site, that a very high portion of visitors camping can read the English language and will likely access the site via their own vehicles.

It would be expected that Council approval will be conditioned to ensure all requirements set out in the BMP and BEEP will be implemented.

- Noted – Action Note 4 – 6 under Table 6 of the BMP clearly outlines the commitment for the landowner/occupier to be familiar with the BMP and BEEP requirements, to undertake and update the BEEP on an annual basis and install the Emergency Evacuation diagram on the inside face of internal doors, ensuring it is clearly visible to occupants. These Actions have been duly considered by a suitably qualified fire practitioner (in preparing the BMP and BEEP) to provide suitable protection measures that respond the short-term camping ground accommodation land uses.

bushfire, and people who may be less able to respond in a bushfire emergency.

There are significant risks to visitors and guests staying at the property who may be unfamiliar with the area and unaware that bushfire poses a significant risk to people and property in the area

- Maintain public roads in proximity to the Site according to the Guidelines.

It is not the understanding of the Darradup VBFB that the Shire has responsibility of the maintenance of Jalbarragup Road between Johnston Road and Mowen Road.

- Darradup VBFB is not qualified to assess compliance of public roads referenced in the Bushfire Management Plan and Emergency Evacuation Plan to *The Guidelines for Planning in Bushfire Prone Areas* (WAPC, v1.4 December 2021) ('the Guidelines')
- As per the limitations statement '*Unless otherwise stated in the report, Ecosystem Solutions Pty Ltd has not independently verified such information and cannot guarantee its accuracy or completeness*'. No statement of independent verification of road standards for evacuation routes could be found in the provided documentation.
- It is recommended that the shire of Nannup Roads and Depot Services be consulted regarding this requirement.

These actions are consistent with similar tourist proposals approved in rural areas that accommodate tents or caravans and the requirements set out in the Guidelines. As a result, no additional Action note is required under Table 6 of the BMP.

- Noted - It is agreed that road standards should be considered by the Shire of Nannup with other relevant authorities that may also manage Jalbarragup Road. However, it is the proponents position that Jalbarragup Road will likely remain as an accessible road between Johnston Road and Mowen Road as it provides alternative access to natural assets and other sensitive land uses (including permanent residences and short stay chalet accommodation) on 'Rural' and 'Rural Residential' zoned land in the locality.
- Noted – We agree that Darradup VBFB is not qualified to assess compliance of public roads referenced in the Bushfire Management Plan and Emergency Evacuation Plan.
- Noted – Disagree – refer to response provided earlier in this submission response on the same matter.
- Noted – Agreed – The proposal should be assessed internally by Council's Technical Service Section in context with the submitted BMP which confirms 'compliance with the acceptable solution has been met' as per the Guidelines.

It should also be noted that the BMP includes, as a Shire of Nannup responsibility, that it maintain public roads in proximity to the Site according to the Guidelines. This is provided under Section 5 of the BMP.

		<ul style="list-style-type: none"> • Occupants: 150 people plus 30 campsites in Bushfire Emergency Evacuation Plan (BEEP) To note inconsistency between Bushfire management Plan and the development proposal scope, which references approximately 25 caravan sites (powered and unpowered) and a function room (150 – person capacity) • To note that New Fire Danger Ratings launching on September 1 2022, and should be incorporated in to updated versions of this plan (DFES Media release, 12 July 2022 – New Fire Danger Ratings launching 1 September 2022 DFES • It is recommended that the primary and secondary evacuation locations be swapped. <p>In most cases (dependent upon the location of the bushfire), direction from authorities will be to evacuate to Nannup townsite, and this will be the preferred evacuation route of local residents.</p> <p>The currently proposed primary evacuation location is against this likely flow of local traffic, requiring passing of traffic at a one-lane bridge.</p> <p>The current primary evacuation route utilises gravel roads, which are maintained to a lower standard than those of the secondary evacuation route (via bitumen)</p>	<ul style="list-style-type: none"> • Noted - The proposed number of camping sites (powered and unpowered) is approximately 25. The BEEP can be adjusted to reflect this figure. • Noted – can be updated in the BEEP • Noted – Fire Consultant (Ecosystem Solutions) confirms that the primary and secondary evacuation routes can be swapped as requested by the Darradup Volunteer Bushfire Brigade. The BEEP (and associated Evacuation diagram can be updated in the BMP.
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Daniel Wong
Department of Water and Environmental Regulation

Advice

Submission provided in full

Issue 1: Flood advice

Advice 1: The Shire is advised:

- a) DWER does not have any formal floodplain mapping for this area
- b) historic peak flood levels for major events at the Jalbarragup Road Crossing, about 50 meters upstream from this lot has a peak level of 46.98m AHD (~1 in 100 AEP or 1% AEP)
- c) a minimum habitable floor level of 47.5 m AHD is recommended to ensure adequate flood protection
- d) If the proponent provides additional detailed survey of the land, DWER can provide additional advice on the suitability of the proposal

Discussion 1: The Department of Water and Environmental Regulation provides advice and recommends guidelines for development on floodplains with the object of minimising flood risk and damage.

We do not have any formal floodplain mapping for the Jalbarragup area, but we have the following information on historic peak flood levels for major events at the Jalbarragup Road Crossing, located approximately 50 meters upstream from the Lot:

<u>Event level</u>	<u>Peak</u>
3 August 1964 (~ 1 in 50 or 2% AEP) m AHD	46.035
22 January 1982 (~1 in 100 AEP or 1% AEP)	46.98

• Noted

• Noted

- The abluion block is located on the same contour level as the existing shed which on or close to 47.5m AHD
- Finished Floor Levels for the abluion Block will be provided with the building license. The proposed function/activity room proposes to convert an existing structure (shed) whereby levels have already been established.

Landgate Contours have been included on to the updated Site Plan showing the location of the camping area, abluion block (which responds to BMP setback requirements and is setback) and existing shed the subject of a change of use to a function/activity room)

m AHD

Based on this information, the estimated 1 in100 AEP flood level at Lot 1 #345 Jalbarragup Road is estimated to be ~ 47.0 m AHD.

The available survey information shows the proposed development on the Lot may be subject to flooding during a 1 in 100 AEP flood event. Our floodplain management strategy for the area states:

- Proposed development (ie, filling, building, etc) that is located outside of the floodplain is considered acceptable with respect to major flooding. However, a minimum habitable floor level of 47.5 m AHD is recommended to ensure adequate flood protection.
- When development is proposed within the floodplain our department assesses each proposal based on its merits and the factors examined include depth of flooding, velocity of flow, its obstructive effects on flow, possible structural and potential flood damage, difficulty in evacuation during major floods and its regional benefit.

With regard to this proposal the following additional comments are provided:

- Noted

- Noted – refer to response above

- Noted – refer to comments above

- The locations of the proposed function room and ablutions block is approximately 100 m from the Blackwood River. The available contour shows the general natural surface of the land at the location of these developments is between 45.0 m AHD and 50.0 m AHD. We recommend the ablution block and function centre are located above the 47.0 m AHD contour and have minimum habitable floor levels of 47.5 m AHD. The available contour information is insufficient to comment on the suitability of the proposed location and as no information has been provided on the proposed floor levels, we are also unable to comment on this aspect of the proposal.
- The proposed camping and caravan site for 25 spots is located on land below 45.0 m AHD, which suggests they will be flooded in 1 in 10 AEP events and larger. Flood depths in the 1 in 100 AEP event will exceed 2.0 metres deep which is hazardous to people, vehicles and buildings are vulnerable to failure (refer to attached flood damage curves). This area is only suitable to tent and/or visiting caravans. We would not support anything permanent/semi-permanent (eg, chalets, transportables, on-site caravans, etc) at this location

If the proponent provides additional detailed survey of the land, we can provide additional advice on the suitability of the proposal.

Please note that a failure to adhere to these recommendations will result in a greater exposure to risks of flood damage.

Issue 2: Sewage disposal

- Noted – the camping ground is to be used for tent, camper trailer and/or caravan accommodation only.

- Noted

Advice 2: To protect the water quality of the Blackwood River, the proposed sewage disposal should be consistent with the principles of the Government Sewerage Policy (Sept 2019), in particular:

- a) The sewage disposal point be located 100 metres away from the Blackwood River and onsite waterbody.
- b) The separation distance between the waterway and sewage disposal point should be measured outwards from the outer edge of riparian or wetland vegetation
- c) Ensuring a vertical separation distance (0.6-1.5 m depending on soil type and the type of treatment system used) between the sewage disposal are to the highest groundwater
- d) The Shire to consult with its Environmental Health Officer as required

Discussion 2: No sewage disposal details have been provided in this proposal – importantly the sewage disposal area in relation to the waterway and type of treatment system required.

Clause 5.2.2 'Separation from water resources' of the *Government Sewerage Policy* (September 2019) (to be referred to as the GSP 2019) states that an on-site sewerage system is not to be located within 100 metres of a waterway, or in any area subject to inundation and/or flooding in a 10 per cent Annual Exceedance Probability (AEP) rainfall event.

Although the GSP 2019 does not directly apply to this development on the basis the land is zoned 'General Agriculture' (defined as a rural use in the GSP 2019) and size of

- Noted – the ablution block is located 110m from the Blackwood River waterbody, with the wastewater system also being setback greater than 100m
- Noted - achieved

- Noted – The landowner has discussed the location of the effluent disposal system with Council's environmental health officers, who confirm the site is suitable to support an appropriate wastewater system.
- Noted – refer to comment above.

the block exceeding 4ha, the intent of this policy is to protect the receiving environment (Blackwood River) and public health.

Nutrients and pathogens from the sewage disposal area can be mobilised into this waterway, particularly during large storm events via sheet flow, or via hydraulic transmission through the soil profile.

To protect the water quality of the Blackwood River, the proposed sewage disposal should be consistent with the principles of the GSP 2019, in particular:

- a) The sewage disposal point be located 100 metres away from the Blackwood River and onsite waterbody.
- b) The separation distance between the waterway and sewage disposal point should be measured from the outwards from the outer edge of the riparian or wetland vegetation
- c) Ensuring a vertical separation distance (0.6-1.5 m depending on soil type and the type of treatment system used) between the sewage disposal are to the highest groundwater
- d) The Shire to consult with its Environmental Health Officer as required

The department advises that the highest groundwater occurs between August to early October (late winter to early spring) depending upon rainfall.

Issue 3: Clearing of native vegetation may be subject to the *Environmental Protection Act 1986* (EP Act)

Advice 3: The Shire is advised in the event clearing of native vegetation is proposed:

- a) for the function room and other structures, the proponent is to obtain development approval prior to clearing to ensure the clearing is exempt under the EP Act, and clearing to be in accordance with the Shire's Firebreak and Fuel Hazard Reduction notice
- b) for the camping and caravan sites where structures are not proposed, a clearing permit may be required, and the proponent is to refer to the following link for assistance:
- <https://www.wa.gov.au/government/publications/guideline-native-vegetation-clearing-referrals>
- c) if further assistance is required, DWER's Native Vegetation Regulation section can be contacted by email (admin.nvp@dwer.wa.gov.au) or by telephone (6364 7098)

Discussion 3: Under section 51C of the *Environmental Protection Act 1986* (EP Act), clearing of native vegetation is an offence unless:

- it is undertaken under the authority of a clearing permit
- it is done after the person has received notice under Section 51DA(5) that a clearing permit is not required
- the clearing is subject to an exemption

Exemptions for clearing that are a requirement of written law, or authorised under certain statutory processes, are contained in Schedule 6 of the EP Act. Exemptions for low impact routine land management practices outside of environmentally sensitive areas (ESAs) are contained in the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (the Clearing Regulations).

In the event the clearing of native vegetation is proposed, the

- Noted – All proposed structures are to located on cleared pasture land, so no clearing permit is required
- Noted – the camping and caravan sites are located on parkland cleared land. The proponent will consider this advice in context with the proposal.
- Noted.

following is advised:

Function room and other structures

- Based on the information provided, should development approval be issued, the proposal is likely to be exempt from the requirement for a clearing permit under Regulation 5, Item 1 of the Clearing Regulations.

• Noted

Note that this exemption does not apply prior to development approval being issued.

- If the proposed clearing for the BPZ/APZ is considered by the Shire to be appropriate, and clearing of native vegetation for this purpose is specified within the Development Approval, it is likely to be exempt under Regulation 5, Item 1.
- If the proposed clearing for the BPZ/APZ is in accordance with the Shire's Firebreak and Fuel Hazard Reduction Notice, it is likely to be exempt under Schedule 6, Clause 10 (clearing in accordance with section 33 of the Bush Fires Act 1954 (BF Act), after the building/structure has been erected.

• Noted

• Noted

Please note that the guide to exemptions does not reflect the correct schedule location for the above BF Act exemption, given the change was made recently as part of the EP Act amendments. Please refer to Schedule 6, Clause 10 of the EP Act for the details relating to this exemption.

Camping and Caravan sites

- In the event clearing of native vegetation is proposed in areas where no structures are proposed, the following is advised:

• Noted - The Camping Ground is located on land that is predominantly cleared but contains parkland trees (that will be retained to provide shade and amenity for visitors) and areas of

Based on the information provided, it is not clear whether the proposal requires the clearing of native vegetation. If any clearing is proposed, a clearing permit is required, noting that exemptions do not apply.

Please note that a new referral system under the *Environmental Protection Amendment Act 2020* commenced on 22 October 2021.

Under the referral system, the Department will determine whether very minor clearing proposals require a clearing permit.

The decision on whether a clearing permit is required will be made against criteria specified in the EP Act and the *Guideline: Native vegetation referrals* available here:

<https://www.wa.gov.au/government/publications/guideline-native-vegetation-clearing-referrals>

It appears that the referrals process may be applicable to the clearing proposed.

Applicants are encouraged to review the guideline to determine whether the proposed clearing satisfies all of the criteria specified under section 51DA of the EP Act.

If the clearing does not satisfy all of the criteria under section 51DA of the EP Act, a clearing permit is required.

The Department has not received a clearing permit application for this proposal. Application forms are available from <https://www.wa.gov.au/service/environment/environment->

bracken. Removal of some bracken and pruning of trees within the camping ground area will be required for the camping area.

The proponent will consider this advice in context with the proposal.

		<p>information-services/clearing-permit-forms</p> <p>Information regarding clearing permit fees can be found here: Clearing fees – frequently asked questions Western Australian Government (www.wa.gov.au)</p> <p>If further clarification is required, please contact DWER’s Native Vegetation Regulation section by email (admin.nvp@dwer.wa.gov.au) or by telephone (6364 7098).</p>	
53	Harley Dykstra Planning & Survey Solutions	<p>Oppose</p> <ul style="list-style-type: none"> Reference to petition provided at Appendix A of the Harley Dykstra Planning & Survey Solutions (‘the planning consultants submission’) <p>The specific objectives of the Agricultural zone in the scheme are as follows:</p> <ul style="list-style-type: none"> <i>(a) To preserve the rural character and setting of the zone, particularly along transport corridors;</i> <i>(b) To promote a range of rural pursuits which are compatible with the capability of the land to sustain those pursuits;</i> <i>(c) To conserve the productive potential of agricultural land and support the continued development of extensive farming; and</i> <i>(d) To encourage environmental sustainable development that takes into account the land’s natural attributes, including topography, geomorphology, remnant</i> 	<ul style="list-style-type: none"> Noted - The petition of objection (prepared by others) to the proposal provided at Appendix A of the Harley Dykstra Planning & Survey Solutions (‘the planning consultants submission’) does not provide any reasons justifying its position. It therefore contains no significant merit in context with the proposal. Noted – The objectives listed in the planning consultant’s submission do not reflect the actual zone objectives set out in the Shire of Nannup Local Planning Scheme No.4 – gazetted on 24 November 2022. Notwithstanding this inconsistency, a response has been prepared in context with each submission comment made, noting the application was submitted prior to Scheme No. 4 being gazetted, but also noting the proposal will be determined in accordance with the new Scheme. It is worth noting that Scheme No.4 would have been considered a seriously entertained planning document at the time of this proposal being lodged and advertised by Council.

vegetation, watercourses and groundwater.

The proposed development of the site does not satisfy the objectives of the Agriculture zone for the following reasons:

- The proposed Function Centre is a 'Use Not Listed' in the Agriculture zone;

- The rural character of the locality will be compromised by the proposed land uses. A caravan park, camping ground and function centre are not an agricultural use and are not compatible with surrounding land uses;

- Noted –disagree - The land is zoned 'Rural' in the Shire of Nannup Local Planning Scheme No.4 ('the Scheme'). A proposed Camping Ground is a permissible 'A' Land Use in the 'Rural' zone. Furthermore a Function / Activity Room could reasonably be construed as a Reception Centre as defined in Council's Scheme. A Reception Centre is a permissible 'A' Land Use in the 'Rural' zone. It is also reasonable that the Function/Activity Room could also be considered as an incidental land use linked with the camping ground, whereby visitors staying will have access to use the facilities for cooking and other community based activities.

If Council is of the opinion that the Function/Activity Room is a Use Not Listed, then it is also able to consider the proposed use in line with Clause 18 (4) of its Scheme. It is obvious that the Council has resolved to advertise the proposal. Hence it is reasonable to conclude that it has determined the land use in line with Clause 18 (4) (b) whereby it has determined that *'the use may be consistent with the objectives of a particular zone and advertise under clause 64 of the Deemed Provisions before considering an application for development approval for the use of the land'*.

This reason is therefore considered not relevant as a Use Not Listed can reasonably be considered within the 'Rural' zone in Council's Scheme No.4.

- Noted – disagree – The majority of the land contains blue gum plantations (rural land use), along with an ornamental vineyard and areas of cleared land with parkland trees and an existing shed (where the proposal aims to retain the outside character of the building while refurbishing the internal part of the structure to support Function/ Activity room uses. The proposed ablution Block will be located west of the existing shed and is

substantially setback from boundaries meaning there will be negligible visual impact to the existing rural character of the land in its location.

It should also be noted that the recently gazetted Scheme No.4 includes a specific objective that reads -

- *'To provide for a range of non-rural land uses where they have demonstrated benefit and are compatible with surrounding rural uses.'*

The proposed camping ground will utilise an area where parkland trees are located. While these land uses are non-rural based, they represent permissible land uses within Council's Scheme that provide a low key, affordable short stay accommodation option that complement the rural setting in which it is located. The proposed land use is therefore considered suitable in context with the property continuing to use the balance portion for the land for rural based and other low key accommodation purposes, which have also been approved and are operating on the property, and on other short stay land uses within the locality.

The proposed camping area is suitably located on land that provides parkland trees and north facing aspect adjacent to the Blackwood River foreshore reserve. It represents a low key affordable tourist accommodation option located in an attractive setting, while having no impact on the environment.

The proposal is therefore consistent with the aims to provide tourism facilities in the rural areas of the Shire (as set out in its Local Planning Strategy), noting it appropriately addresses bushfire planning, environmental assets, landscape qualities and compatibility with the adjoining land use – being the foreshore reserve to the Blackwood River – which is a public asset able to all who reside and visit the area.

The proposed conversion of the existing shed to a Function

- The proposal does not satisfy Clause 67(2)(n) and (t) of the of the Planning and Development (Local Planning Schemes) Regulations 2015, as the proposal will increase the existing level of noise and traffic activity in the locality, and result in a loss of amenity to adjoining residences. The traffic generated from the proposed facilities, and in particular if events are held regularly at the Function Centre, is a significantly higher level of traffic generated in comparison to a typical Agriculture land use; and

/Activity Facility/Room will enable the structure to be used by the camping patrons (for cooking and community activity purposes) and also provides an opportunity for separate functions able to be undertaken to support community based functions/gatherings etc (celebrations, craft groups, children's activities (ie dance), music, meetings and social gatherings). This represents an opportunity to provide a facility that is both robust and sustainable use of an existing building that will provide a demonstrated benefit to visitors and the community.

- Noted – Disagree – Clause 67(2)(n) and (t) of the of the Planning and Development (Local Planning Schemes) Regulations 2015 refer to 'Schedule 2 - Deemed provisions for local planning schemes'.

Clause (n) states –

(n) the amenity of the locality including the following –

- *Environmental impacts of the development,*
- *The character of the locality;*
- *Social impacts of the development,*

With regard to environmental impacts of the development, the Camping Ground is located on land that is predominantly cleared but contains parkland trees (that will be retained to provide shade and amenity for visitors) and areas of bracken. Removal of some bracken and pruning of trees within the camping ground area will be required for the camping area.

With regard to noise generated from the camping facility, it needs to be made clear that the proposal aims to accommodate visitors (a sensitive land use) within an area that is substantially setback from other Rural and Rural Residential landholdings in the locality. Furthermore , the proponent confirms that noise and guest behaviour will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an

		<ul style="list-style-type: none"> • The productive agricultural use of the land will be compromised by the additional tourist development. 	<p>approved Manager licence AHA).</p> <p>The Camping Ground and associated land uses will also be managed in line with a license issued under the Caravan Parks and Camping Ground Act 1995 and associated Caravan Parks and Camping Regulations 1997. A License issued under the Act & Regulations attends to such matters as -</p> <ul style="list-style-type: none"> ○ provision for recreational facilities/areas, ○ provision of ablution and toilet facilities, ○ laundry and washing up areas, ○ lighting and noise, ○ fire- fighting equipment and provision of water supply ○ waste management and on-site traffic management (slow speed limits) <p>Clause (t) states –</p> <p><i>(t) The amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety.</i></p> <ul style="list-style-type: none"> • Please refer to the observations made at Submission 22 of this Response to Submissions which considers traffic counts along Jalbarragup Road during July and August 2019. These observations clearly demonstrate the current very low traffic volumes using Jalbarragup Road. It also demonstrates that Jalbarragup Road has clear capacity to accommodate the increased traffic flows generated from this proposal, and that the traffic increase can be readily accommodated and will not have any adverse effect on the traffic flow and safety of the road. • Noted – disagree - The majority of the land contains blue gum plantations (rural land use), a cluster of dwellings (2) and existing short stay cabins, a dam area central to the property, an ornamental vineyard, areas of cleared land with parkland trees and an existing shed.
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- Building setbacks specified in LPS 3 is 20 metres from the lot boundary. The area designated on the plans provided with the application for 25 sites for camping and caravans is immediately adjacent to the northern lot boundary

It is therefore clearly evident that the majority of the land is being used for plantation purposes, and the area of land the subject of this proposal represents a small proportion of the overall landholding.

The proposal aims to utilise an existing structure on the property to be able to be used for Functions/Activities that will provide a community benefit and also an activity facility able to be used by campers.

The proposal therefore does not compromise the agricultural land uses already being undertaken. Furthermore, the tourist and community land uses proposed provides an opportunity to value add to the rural production activities already in place – which is being encouraged via the Local Planning Strategy in Rural for Rural areas.

- Noted – The proposed camping ground is proposed to be setback approximately 12m from its northern boundary where it abuts Reserve 43555.

We are seeking Council discretion to support the siting of the camping ground by reason that:

- the proponent aims to utilise the existing parkland trees to provide shade and added amenity to camping sites within the rural setting,
- The camping area will accommodate camping equipment and vehicles only and will not contain any fixed building structures,
- That the Function/Activity Facility/Room is proposed to utilise an existing shed that is setback 50m from the northern side boundary, with the proposed Ablution Block proposed to be setback 58m from the northern property boundary. These structures are/will be screened from the northern Reserve by the existing parkland cleared trees,
- Access to/from the camping ground can be clearly sign

		<p>Local Planning Policy 012, specifies guidelines for the assessment of tourist accommodation in rural zones. Site dependant, key matters to be addressed within an Development Application include:</p> <ul style="list-style-type: none"> • traffic safety and impact; • access from a suitably dedicated and constructed public road; • servicing; 	<p>posted to make sure visitors use established access area to/from the property.</p> <ul style="list-style-type: none"> • Noted – Response provided to each listed item below – • Please refer to the observations made at Submission 22 of this Response to Submissions which considers traffic counts along Jalbarragup Road during July and August 2019. These observations clearly demonstrate the current very low traffic volumes using Jalbarragup Road. It also demonstrates that Jalbarragup Road has clear capacity to accommodate the increased traffic flows generated from this proposal, and that the traffic increase can be readily accommodated and will not have any adverse effect on the traffic flow and safety of the road. • Feedback from council technical services Department and in the Bushfire management Plan confirm that Jalbarragup Road is dedicated and constructed to a suitable standard providing satisfactory access to the property • Water to the ablution facilities and Function/Activity facility will be provided via water supplied from roof catchment off the existing shed and drawn from two existing bores located on the property. • The ablution facility has been included with the proposal. The proponent has been in discussions with Council’s environmental Health officers and confirms that there is ample area to locate a suitably sized effluent system to accommodate the number of people camping or visiting the property on cleared land and setback greater than 100m from the Blackwood River • Reticulated Power supply is already provided to the property.
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		<ul style="list-style-type: none"> • environmental impacts; • fire management and impacts; • visual impacts; • appropriate setbacks and buffers to other uses; 	<p>Any upgrades to the power supply will accord with the minimum standards for the land uses proposed</p> <ul style="list-style-type: none"> • The proposal aims to renovate an existing farm shed so as to maintain its rustic appearance while offering a Function/Activity Facility able to be used by visitors. The proposed Function/ Activity Facility and Ablution Block are to be located on cleared land. The Camping Ground is located on land that is predominantly cleared but contains parkland trees (that will be retained to provide shade and amenity for visitors) and areas of bracken. Removal of some bracken and pruning of trees within the camping ground area will be required for the camping area. • The submitted Bushfire Management Plan (BMP), associated Bushfire Emergency Evacuation Plan. The response from the fire consultant (Ecosystem Solutions) response to the DFES submission has also be provided confirming the BMP complies with State Planning Policy (SPP) 3.7 and Guidelines for Planning in Bushfire Prone Areas ('Guidelines', WAPC, V1.4 December 2021) • Visual impacts from Jalbarragup Road will be minimised by the proposed camping area being substantially setback from the road and nestled within existing parkland trees. The proposed conversion of the existing shed to a Function/Activity Facility/Room will ensure the outside façade of the building will remain, thereby reflecting the rural built form character. The ablution Block is located west (behind) the shed, which will screen it from Jalbarragup Road. These structures are also setback greater than 50m from the properties northern boundary – which complies with the minimum setbacks to an adjoining reserve. <p>The rural visual amenity of the area will therefore be retained</p> <ul style="list-style-type: none"> • Refer to comments above relating to setbacks. The proposed
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		<ul style="list-style-type: none"> • capability of the land for agriculture and rural pursuits; • capability of the land to accept the use, by reason of soil type and stability; and • density and scale of the proposed development. • Although, a Bushfire Management Plan was submitted with the application, other matters listed above have not been investigated. It is considered necessary for the application to address these matters particularly as the environmental, traffic and others matters are of significant consequence. 	<p>land uses are also suitably setback from the blue gum plantations located to the south of the driveway.</p> <ul style="list-style-type: none"> • The proposed camping ground, Ablution Block/ Function/ Activity Facility/Room and associated car parking be located within approximately 6,500m² of land on a 39.77ha lot. This equates to 1.63% of the overall landholding, where the majority of the property contains blue gum plantations. <p>While Land capability information for the property could not be sourced by publication, it is clear that the proposal will have a minimal impact on the overall land holding to continue to be used for rural based agricultural pursuits.</p> <ul style="list-style-type: none"> • The landowner has discussed the location of the effluent disposal system with Council’s environmental health officers, who confirm the site is suitable to support an appropriate wastewater system. • The proposed 25 camping sites will provide short stay affordable accommodation that will offer a point of difference where visitors want to stay in rural and natural settings. This, coupled with the fact that the proposal aims to utilise an existing shed for a Function/Activity Facility that is able to be used by visitors camping, provides a logical, robust and sustainable use of an existing structure. Hence the density and scale of the proposal is not considered significant. Furthermore the proposed camping sites are not considered a major tourism proposal, as set out in the Shire’s Local Planning Strategy. • Noted – all matters listed above have been addressed in this submission response accordingly.
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- The key objective of the Local Planning Policy 021 is to minimise the risk from bushfire to life, property and community assets for new proposals. Although a Bushfire Management Plan (BMP) has been prepared and submitted as part of the application, the wider locality should be given due consideration. As stated previously the surrounding land consists of heavily vegetated State Forest and Conservation Reserves. These areas have an extreme fire risk and with access roads of limited construction standard, pose a severe risk to visitors to the area especially those unfamiliar with the region. Figure 2 below is an aerial photograph of the locality showing the subject site outlined in red. This demonstrates the dense vegetation in the area.

The BMP identifies most of the site as BAL- Flame Zone, with a small portion of the property, where the Function Centre is to be located rated as BAL – 29. The BAL – 29 rating requires establishment and maintenance of an asset protection zone. It should be noted the access driveway is also within the flame zone rating.

The BMP states: *'The proposed camping sites are situated in areas of BAL-FZ and BAL-40. A tent or caravan does not provide any protection from a bushfire and placing a tent or caravan in BAL-29 offers no protection for the occupants. Therefore, the tents and caravans are considered a tolerable loss in the event of a bushfire.'*

Considering the typical users of camping grounds are young families, the risk associated with evacuation in the event of a fire should be considered unacceptable.

Jalbarragup Road fronts the property on the eastern boundary. Just north of the site the Blackwood River is crossed by Jalbarragup Bridge, which is a single-lane construction which does not allow traffic to pass, limiting

- Noted - this matter was also raised in the DFES submission. The response from the fire consultant (Ecosystem Solutions) to the DFES submission confirms that Bushfire Management Plan Bushfire Emergency Evacuation Plan complies with the acceptable solution for Element 1, which is considered by the Guidelines for Planning in Bushfire Prone Areas, and therefore State Planning Policy 3.7, as meeting the intent of Element 1.

- Noted – The BMP and the response from the fire consultant (Ecosystem Solutions) to the DFES submission confirms the bridge to the north of the Site is considered a pinch point, which is 4 m trafficable surface for a very short distance in

emergency evacuation routes.

- The Government Sewerage Policy applies to planning proposals throughout Western Australia including development applications other than for a rural use or development of a single house on a single lot. As the Development Application proposes other uses and on-site effluent disposal, the policy will apply to this application. On-site sewage disposal may be considered where the responsible authority is satisfied that development is capable of accommodating on-site sewage disposal without endangering public health or the environment. As the subject site's northern and western boundaries neighbours the Blackwood River and riparian vegetation associated with the river extends into the boundary of the lot, effluent disposal would be required to be setback 100m setback from this vegetation as per the policy. A technical investigation in the form of a Site and Soil Evaluation should be included with the Development Application to address such matters as:
 - Site and soil conditions;
 - Separation to groundwater;
 - Location of effluent disposal system;
 - Slope and instability; and
 - Proposed Effluent disposal system
- A site adjacent to the north west corner of the site is identified as 'Habitats of threatened and priority ecological communities and specially protected water-dependant fauna point'. The mapping of this site is shown in Figure 3.

relation to the remainder of the access way to the north of the Site. The bridge has good visibility and if required in an emergency situation, it is likely that the route will be used for all vehicles heading in the same direction, ie north away from the source of fire, well before the bushfire and therefore well before fire trucks are required to enter the Site. The evacuation route that is required to be installed is provided in Appendix F, as stated in the BMP

- Noted – Aligned with the submission comments (*'On-site sewage disposal may be considered where the responsible authority is satisfied that development is capable of accommodating on-site sewage disposal without endangering public health or the environment'*), the proponent has been in discussions with Council's environmental Health officers and confirms that there is ample area to locate a suitably sized effluent system to accommodate the number of people camping or visiting the property on cleared land and setback greater than 100m from the Blackwood River.

No additional assessment is therefore required.

- Noted – not relevant - This is because the 'Habitats of threatened and priority ecological communities and specially protected water-dependent fauna point' are not located on the property

- The Blackwood River and associated vegetation has been identified as Carnabys Cockatoo Areas requiring investigation as feeding habitat in the Jarrah Forest IBRA Region (DBCA-056). The vegetation is part of the Southern Jarrah Forest sub-region. Figure 4 shows the area in green that has been identified as requiring investigation. This area includes the portion of the site proposed for the caravan and camping areas and assessment of this portion of the site should be undertaken as part of the Development Application.

- It is difficult to determine from the submitted plans if clearing of vegetation is proposed as part of the application. It does however appear that some clearing may be required in the area proposed for camping and caravans. Considering the environmental values, especially in terms of threatened fauna species in the locality, clearing of native vegetation should be avoided.

- The Department of Planning, Lands and Heritage (DPLH) register of heritage sites shows the portion of the Blackwood River and adjacent vegetation as Registered Aboriginal Site 20434. The site is identified as a 'Mythological' site and relates to most of the Blackwood River, associated banks and vegetation.

Further investigation should be undertaken in regard to the proposed works on the site. A portion of the property is also identified as having a 'Historic Heritage Place'. Prior to development further investigation of the heritage value of any buildings identified would need to be investigated.

- Details of other services and infrastructure not included in the Development Application are:

- Potable water treatment;

- Noted - The Camping Ground is located on land that is predominantly cleared but contains parkland trees (that will be retained to provide shade and amenity for visitors) and areas of bracken. Removal of some bracken and pruning of trees within the camping ground area will be required for the camping area.

In noting that all trees that may fall in the Carnaby Cockatoo Investigation area will be retained (with some minor pruning to occur) as part of the proposal, further assessment is not considered necessary.

- Noted – please refer to the response provided above. The intent of the proposal is to nestle the camping ground within parkland cleared trees that are to be retained. Hence minimal clearing will be required.

- Noted – The proposed development application is located outside aboriginal Site 20434 and the Historic Heritage Place (which falls over the existing houses on the property). Hence no further assessment is required as it will not impact on either registered heritage site.

- Noted – please refer to response below –

- Please refer to response relating to servicing,

		<ul style="list-style-type: none"> • Vehicle movements; • Access onto Jalbarragup Road; • Car parking; and • Stormwater management. • Details of the operation and management of the facility are not included in the Development Application. Information in relation the following matters needs to be addressed to properly assess the proposed development as well as inform other neighbouring residents of factors that may affect the enjoyment of their rural lifestyle: <ul style="list-style-type: none"> • Noise Management – Live music, PA system, monitoring of noise emissions, notification of neighbours prior to an event, complaints register; 	<ul style="list-style-type: none"> • Please refer to the observations made at Submission 22 of this Response to Submissions which considers traffic counts along Jalbarragup Road during July and August 2019. These observations clearly demonstrate the current very low traffic volumes using Jalbarragup Road. • Access on to Jalbarragup Road is clearly shown on the updated Site Plan submitted with the this response to submissions • Please refer to the observations made at Submission 22 of this Response to Submissions which considers car parking in context with the proposed Function Centre. Car parking has also been indicatively identified on the updated Site Plan submitted with the this response to submissions to demonstrate it can be accommodated on cleared land close to the Function/Activity Facility/Room • Noted – matters relating to stormwater management can be addressed at the building stage in relation to the proposed Ablution Block and refurbished shed proposed to be used for a Function/Activity Facility/Room. • Noted – refer to response below for each listed matter • Noise generated from the Camping Ground and Function /Activity Facility will be negligible noting the number of camping sites being limited to 25 and any functions will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA)
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- Details of the management and operation of the Function Centre – Number of functions permitted, guest limits, serving of alcohol and liquor licencing, operating times, lighting, rubbish disposal, security, staffing, catering and deliveries; and

- Carparking – number of carparking bays proposed does not appear to be adequate for the venue size.

- Of particular concern to neighbours is the noise generated from events held at the function centre. Due to the remoteness of the site, if attendance of the Shire's Ranger or Police services should be required, these are some distance from the location and difficult to access after business hours. It should be noted that no acoustic assessment, recommended maximum noise levels or times limit for events have been included in the application

- The Development Application advertised by the Shire of Nannup has been thoroughly reviewed as part of the preparation of this submission. It must be acknowledged that the application does not include the details required

- The camping ground will also need to be managed in line with a license issued under the caravan Parks and camping Grounds Act 1995 and associated Caravan parks and camping Grounds Regulations 1997. A License issued under the Act & Regulations attends to such matters as

- provision for recreational facilities/areas,
- provision of ablution and toilet facilities,
- laundry and washing up areas,
- lighting and noise,
- fire- fighting equipment and provision of water supply
- waste management and on-site traffic management (slow speed limits)

- Please refer to the observations made at Submission 22 of this Response to Submissions which considers car parking in context with the proposed Function Centre. Car parking has also been indicatively identified on the updated Site Plan submitted with the this response to submissions to demonstrate it can be accommodated on cleared land close to the Function/Activity Facility/Room

- The proposed camping ground would provide no more noise than other human based activities that take place within adjoining 'Rural' zoned land or 'Rural Residential' zoned land located on the other side of the Blackwood River, with the closest lot being at least 230m away from the proposed camping ground, ablution facility and function/activity centre site. As outlined above any functions will be managed according to guidelines as proposed by Shire policies and managed by staff who will have training in this area and the operator/landowner (who has an approved Manager licence AHA)

- Noted – The response to submissions, coupled with the compliant BMP and BEEP and the updated Site Plan clearly address the matters raised in submissions. It also demonstrates that the proposed land uses are permissible

of a Development Application for facilities of this nature. The objection and concerns of many of the neighbours in terms of the proposed land use not being appropriate in the Agricultural zone is warranted.

- Harley Dykstra has prepared this submission on behalf of Waratah Gallotti, as a representative of concerned neighbours. We respectfully request the refusal of the application and that this submission is appropriately considered by Council

within the 'Rural' zone and represents a low key affordable short stay accommodation option to be nestled within a rural setting. This proposal is consistent with, and reflects the Strategy directions for complementary tourism land uses to be located within the 'Rural' zone.

- AholaPlanning has prepared this response to address the matters outlined in all submissions received. It is considered (and requested) that the Council duly consider the response to submissions and issue a Development Approval subject to fair and reasonable conditions associated with the proposal.

MetroCount Traffic Executive Weekly Vehicle Counts

WeeklyVehicle-12 -- English (ENA)

Datasets:

Site: [Jalbarragup Road] Jalbarragup Road SLK7.3
Attribute: Jalbarragup Road
Direction: 8 - East bound A>B, West bound B>A. **Lane:** 0
Survey Duration: 7:42 Tuesday, 16 July 2019 => 7:48 Friday, 9 August 2019,
Zone:
File: Jalbarragup Road 0 2021-12-16 0829.EC0 (Regular)
Identifier: M021FVV5 MC56-6 [MC55] (c)Microcom 02/03/01
Algorithm: Factory default axle (v5.02)
Data type: Axle sensors - Paired (Class/Speed/Count)

Profile:

Filter time: 7:43 Tuesday, 16 July 2019 => 7:48 Friday, 9 August 2019 (24.0035)
Included classes: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12
Speed range: 10 - 160 km/h.
Direction: North, East, South, West (bound), P = East, Lane = 0-16
Separation: Headway > 0 sec, Span 0 - 100 metre
Name: Default Profile
Scheme: Vehicle classification (AustRoads94)
Units: Metric (metre, kilometre, m/s, km/h, kg, tonne)
In profile: Vehicles = 360 / 360 (100.00%)

Weekly Vehicle Counts

WeeklyVehicle-12

Site: Jalbarragup Road.0.1EW
Description: Jalbarragup Road SLK7.3
Filter time: 7:43 Tuesday, 16 July 2019 => 7:48 Friday, 9 August 2019
Scheme: Vehicle classification (AustRoads94)
Filter: Cls(1-12) Dir(NESW) Sp(10,160) Headway(>0) Span(0 - 100) Lane(0-16)

	Mon 15 Jul	Tue 16 Jul	Wed 17 Jul	Thu 18 Jul	Fri 19 Jul	Sat 20 Jul	Sun 21 Jul	Averages 1 - 5	1 -
7									
Hour									
0000-0100	*	*	0	0	0	1	0	0.0	
0.2									
0100-0200	*	*	0	0	0	0	0	0.0	
0.0									
0200-0300	*	*	0	0	0	1	0	0.0	
0.2									
0300-0400	*	*	0	0	0	0	0	0.0	
0.0									
0400-0500	*	*	0	0	0	0	1	0.0	
0.2									
0500-0600	*	*	0	0	0	0	0	0.0	
0.0									
0600-0700	*	*	0	0	0	0	1	0.0	
0.2									
0700-0800	*	0	0	0	0	6	0	0.0	
1.0									
0800-0900	*	0	0	0	0	2	0	0.0	
0.3									
0900-1000	*	0	0	0	1	2	1	0.3	
0.7									
1000-1100	*	0	0	0	1	2	4	0.3	
1.2									
1100-1200	*	0	0	0	3	2	0	0.8	
0.8									
1200-1300	*	0	0	0	1	4	1	0.3	
1.0									
1300-1400	*	0	0	0	2	5	2	0.5	
1.5									
1400-1500	*	0	0	0	1	3	2	0.3	
1.0									
1500-1600	*	0	0	0	1	0	1	0.3	
0.3									
1600-1700	*	0	0	0	5	4	4	1.3	
2.2									
1700-1800	*	0	0	0	4	0	0	1.0	
0.7									
1800-1900	*	0	0	0	4	0	1	1.0	
0.8									
1900-2000	*	0	0	0	4	0	2	1.0	
1.0									
2000-2100	*	0	0	0	0	0	0	0.0	
0.0									
2100-2200	*	0	0	0	0	2	0	0.0	
0.3									
2200-2300	*	0	0	0	3	0	1	0.8	
0.7									
2300-2400	*	0	0	0	3	0	0	0.8	

0.5

Totals

0700-1900	*	0	0	0	23	30	16		5.8
11.5									
0600-2200	*	*	0	0	27	32	19		6.8
13.0									
0600-0000	*	*	0	0	33	32	20		8.3
14.2									
0000-0000	*	*	0	0	33	34	21		8.3
14.8									
AM Peak	*	*	1100	1100	1100	0700	1000		
	*	*	0	0	3	6	4		
PM Peak	*	2300	2300	2300	1600	1300	1600		
	*	0	0	0	5	5	4		

* - No data.

0.0

Totals

0700-1900	23	6	14	22	37	27	17		20.4
20.9									
0600-2200	26	8	15	24	39	29	17		22.4
22.6									
0600-0000	26	9	15	24	40	30	17		22.8
23.0									
0000-0000	28	9	16	24	40	30	19		23.4
23.7									
AM Peak	1000	0600	1100	0700	0800	1100	1000		
	4	2	2	3	6	5	2		
PM Peak	1400	1600	1600	1400	1500	1300	1300		
	3	2	3	5	6	5	4		

* - No data.

Weekly Vehicle Counts

WeeklyVehicle-12

Site: Jalbarragup Road.0.1EW
Description: Jalbarragup Road SLK7.3
Filter time: 7:43 Tuesday, 16 July 2019 => 7:48 Friday, 9 August 2019
Scheme: Vehicle classification (AustRoads94)
Filter: Cls(1-12) Dir(NESW) Sp(10,160) Headway(>0) Span(0 - 100) Lane(0-16)

	Mon 29 Jul	Tue 30 Jul	Wed 31 Jul	Thu 01 Aug	Fri 02 Aug	Sat 03 Aug	Sun 04 Aug	Averages 1 - 5	1 -
7									
Hour									
0000-0100	0	1	0	0	0	0	0	0.2	
0.1									
0100-0200	0	0	0	0	0	0	0	0.0	
0.0									
0200-0300	0	0	0	0	0	0	0	0.0	
0.0									
0300-0400	0	0	0	0	0	0	0	0.0	
0.0									
0400-0500	2	0	0	0	0	0	0	0.4	
0.3									
0500-0600	0	0	0	0	0	0	0	0.0	
0.0									
0600-0700	0	1	0	1	1	0	0	0.6	
0.4									
0700-0800	1	0	4	1	0	0	0	1.2	
0.9									
0800-0900	0	2	4	2	1	0	0	1.8	
1.3									
0900-1000	7	3	2	1	3	0	0	3.2	
2.3									
1000-1100	3	2	0	3	2	0	0	2.0	
1.4									
1100-1200	0	1	1	2	0	0	0	0.8	
0.6									
1200-1300	3	1	4	2	0	0	0	2.0	
1.4									
1300-1400	3	1	1	3	0	0	0	1.6	
1.1									
1400-1500	1	4	3	6	0	0	0	2.8	
2.0									
1500-1600	2	2	4	1	0	0	0	1.8	
1.3									
1600-1700	1	1	1	2	0	0	0	1.0	
0.7									
1700-1800	1	0	1	1	0	0	0	0.6	
0.4									
1800-1900	3	0	1	1	0	0	0	1.0	
0.7									
1900-2000	0	0	0	0	0	0	0	0.0	
0.0									
2000-2100	0	0	0	1	0	0	0	0.2	
0.1									
2100-2200	0	0	0	0	0	0	0	0.0	
0.0									
2200-2300	0	0	0	0	0	0	0	0.0	
0.0									
2300-2400	0	0	0	0	0	0	0	0.0	

0.0

Totals

0700-1900	25	17	26	25	6	0	0	19.8
14.1								
0600-2200	25	18	26	27	7	0	0	20.6
14.7								
0600-0000	25	18	26	27	7	0	0	20.6
14.7								
0000-0000	27	19	26	27	7	0	0	21.2
15.1								
AM Peak	0900	0900	0800	1000	0900	1100	1100	
	7	3	4	3	3	0	0	
PM Peak	1800	1400	1500	1400	2300	2300	2300	
	3	4	4	6	0	0	0	

* - No data.

Weekly Vehicle Counts

WeeklyVehicle-12

Site: Jalbarragup Road.0.1EW
Description: Jalbarragup Road SLK7.3
Filter time: 7:43 Tuesday, 16 July 2019 => 7:48 Friday, 9 August 2019
Scheme: Vehicle classification (AustRoads94)
Filter: Cls(1-12) Dir(NESW) Sp(10,160) Headway(>0) Span(0 - 100) Lane(0-16)

	Mon 05 Aug	Tue 06 Aug	Wed 07 Aug	Thu 08 Aug	Fri 09 Aug	Sat 10 Aug	Sun 11 Aug	Averages 1 - 5	1 -
7									
Hour									
0000-0100	0	0	0	0	0	*	*	0.0	
0.0									
0100-0200	0	0	0	0	0	*	*	0.0	
0.0									
0200-0300	0	0	0	0	0	*	*	0.0	
0.0									
0300-0400	0	0	0	0	0	*	*	0.0	
0.0									
0400-0500	0	0	0	0	0	*	*	0.0	
0.0									
0500-0600	0	0	0	0	0	*	*	0.0	
0.0									
0600-0700	0	0	0	0	0	*	*	0.0	
0.0									
0700-0800	0	0	0	0	0	*	*	0.0	
0.0									
0800-0900	0	0	0	0	*	*	*	0.0	
0.0									
0900-1000	0	0	0	0	*	*	*	0.0	
0.0									
1000-1100	0	0	0	0	*	*	*	0.0	
0.0									
1100-1200	0	0	0	0	*	*	*	0.0	
0.0									
1200-1300	0	0	0	0	*	*	*	0.0	
0.0									
1300-1400	0	0	0	0	*	*	*	0.0	
0.0									
1400-1500	0	0	0	0	*	*	*	0.0	
0.0									
1500-1600	0	0	0	0	*	*	*	0.0	
0.0									
1600-1700	0	0	0	0	*	*	*	0.0	
0.0									
1700-1800	0	0	0	0	*	*	*	0.0	
0.0									
1800-1900	0	0	0	0	*	*	*	0.0	
0.0									
1900-2000	0	0	0	0	*	*	*	0.0	
0.0									
2000-2100	0	0	0	0	*	*	*	0.0	
0.0									
2100-2200	0	0	0	0	*	*	*	0.0	
0.0									
2200-2300	0	0	0	0	*	*	*	0.0	
0.0									
2300-2400	0	0	0	0	*	*	*	0.0	

0.0

Totals

0700-1900	0	0	0	0	*	*	*	0.0
0.0								
0600-2200	0	0	0	0	*	*	*	0.0
0.0								
0600-0000	0	0	0	0	*	*	*	0.0
0.0								
0000-0000	0	0	0	0	*	*	*	0.0
0.0								
AM Peak	1100	1100	1100	1100	*	*	*	
	0	0	0	0	*	*	*	
PM Peak	2300	2300	2300	2300	*	*	*	
	0	0	0	0	*	*	*	

* - No data.

VULNERABLE LAND USE - LOT 1 (345) JALBARRAGUP ROAD, JALBARRAGUP - PROPOSED CAMPING GROUND, CARAVAN PARK, ABLUTIONS BLOCK & FUNCTION ROOM

Table 1 DFES comments and Ecosystem Solutions response regarding 345 Jalbarragup Road, Jalbarragup BMP BEEP

Issue	Assessment	Action
<p>Vegetation classification</p>	<p>Evidence to support the exclusion of Plot 6, in its entirety, as managed to low threat in accordance with AS3959 is required. In particular, areas of vegetation along the driveway and outside the site appear to contain vegetation but no evidence has been provided to support their exclusion.</p> <p>An enforceable mechanism is required to provide certainty that the proposed management measures can be achieved in perpetuity and that they are enforceable.</p> <p>If unsubstantiated, the vegetation classification should be revised to consider the vegetation at maturity as per AS3959, or the resultant BAL ratings may be inaccurate.</p>	<p>There has been no change to the BMP BEEP.</p> <p>The areas of the Site excluded from classification includes:</p> <ul style="list-style-type: none"> • A vineyard, shown in photo 13 of the BMP. • A single line of trees on either side of a driveway shown in photos 14 and 15 of the BMP. <p>These areas are excluded under clause 2.2.3.2 (f) being vegetation regarded as low threat with insufficient fuel available to significantly increase the severity of a bushfire attack.</p> <p>This is supported by the fact the row of trees along the driveway are sufficiently spaced and are considered a nature strip, or windbreak, used to screen or reduce the effect of wind on the leeward side of the trees.</p> <p>The driveway shall be maintained with suitable access for a fire truck, required by the Shire of Nannup Fuel Hazard Reduction and Firebreak Notice (Notice) and the BMP BEEP which requires a 4 m wide trafficable surface, 6 m wide horizontal clearance and 4.5 m high vertical clearance. This ensures the trees located along the driveway are managed and under pruned to a height of 4.5 m and therefore retained in a low fuel state as per Asset Protection Zone requirements. The Firebreak Notice and BMP BEEP are legally enforceable mechanisms under S. 33 of the <i>Bush Fires Act 1954</i>.</p>

Issue	Assessment	Action
Vegetation classification	<p>Commentary relating to Plot 3 indicates “minimal impacts to native species will be required”. While this may reference the area of Plot 3 outside the APZ identified, it is noted that to achieve APZ standards in a large portion of Plot 3, significant modification to vegetation will be required.</p> <p>BMP should be updated to provide accuracy and clarity.</p>	<p>There has been no change to the BMP BEEP.</p> <p>As stated in the BMP BEEP, and shown by photos 5 to 8, the area of vegetation in Plot 3 includes areas of trees over bracken. To comply with the Asset Protection Zone requirements, the understorey will need to be maintained under 10 cm, which will occur to establish camp grounds. The trees have mostly separated canopy, as required by Asset Protection Zone requirements. There may be some thinning of trees to establish separation in a patch of the APZ, however the trees will be beneficial for shade and protects the area from wind, providing a benefit in a bushfire event. Clumps of trees can be considered as one tree and therefore separation of canopy can be measured from the clump to another clump of trees.</p> <p>Assessment of vegetation via aerial imagery is not accurate as it can not be determined what is understorey verse overstorey. It is also not known what time of day the aerial imagery is taken with shadow from trees creating a darker image and therefore appearing mores densely vegetated.</p> <p>Minimal modification to native vegetation is required as most trees can be retained and the understorey can be retained but kept under 10cm.</p>
Landscape Management Plan	<p>The BMP has identified that a significant amount of Class A Forest within Plot 3 will need to be modified to achieve an APZ compliant with Schedule 1: Standards for Asset Protection Zones contained in the Guidelines.</p> <p>A Landscape Management Plan should be prepared to remove ambiguity for the landowner and to provide a compliance mechanism for the Shire.</p>	<p>There has been no change to the BMP BEEP.</p> <p>As stated above, there is minimal removal of native vegetation required.</p> <p>There is no legally enforceable mechanism to require a Landscape Management Plan by the landowner to achieve Asset Protection Zone requirements.</p>

Issue	Assessment	Action
Construction to AS3959 Building Standards	<p>DFES acknowledges that <i>AS3959 does not apply retrospectively to existing buildings</i>, if the use does not change.</p> <p>However, given the shed will be converted to a function room the decision maker should consider upgrading the building to utilise all of the elements of AS3959 that apply to the appropriate Bushfire Attack Level (BAL). This is consistent with Clause 78E(i) Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 that requires the local government to have regard to the bushfire resistant construction requirements of the Building Code of Australia.</p> <p>This advice is further supported by Clause 5.8.3 of the Guidelines which reads as follows:</p> <p><i>The bushfire construction provisions of the Building Code of Australia do not apply to Class 4 to Class 9 buildings. In these instances, the applicant has the discretion to utilise any or all of the elements of AS3959 in the construction of the building that they deem appropriate.</i></p> <p>Although BAL construction standards do not guarantee the survival of the occupants or building, DFES supports the improved bushfire resilience provided by AS 3959-2018 construction standards.</p>	<p>There has been no change to the BMP BEEP.</p> <p>It is the decision of the Shire of Nannup to enforce the landowner to construct the Function Room to AS3959-2018 BAL-29 standards.</p>

Issue	Assessment	Action
<p>Location</p>	<p>Intent - non-compliant</p> <p>The BMP should not ignore the site context and the serious threat of bushfire to people, property and infrastructure at this location. The likelihood of a bushfire, its severity and intensity, and the potential impact on life and property posed by the bushfire hazard at this location represents an extreme bushfire risk that cannot be adequately reduced.</p> <p>The DFES advice considers the intent of the element, which is to ensure the proposal is “located in areas with the least possible risk of bushfire to facilitate the protection of people, property and infrastructure.” Further, the performance principle states it needs to be demonstrated that “the risk can be managed.”</p> <p>This location does not provide for appropriate bushfire protection to manage the bushfire risk based on a range of factors including, but not limited to:</p> <ul style="list-style-type: none"> - There are vast tracts of bushfire prone vegetation within 150 metres of the site boundary which represents an extreme bushfire risk. - Due to the extreme bushfire prone vegetation on multiple aspects, catastrophic bushfire behaviour is likely, and a bushfire could develop rapidly and grow to a significant size, resulting in the loss of life, property and infrastructure. In the event of a major event in this location, response capability may be detrimentally impacted due to limitations with access, which passes through vegetation classified as extreme hazard. <p>The topography, type and extent of bushfire prone vegetation may result in landscape-scale destruction as it interacts with the bushfire hazard on and close to the site.</p>	<p>There has been no change to the BMP BEEP.</p> <p>The BMP BEEP complies with the acceptable solution for Element 1, which is considered by the Guidelines for Planning in Bushfire Prone Areas, and therefore State Planning Policy 3.7, as meeting the intent of Element 1.</p>

Issue	Assessment	Action
Siting and design	<p data-bbox="412 220 696 252">Intent - non-compliant</p> <p data-bbox="412 260 1227 416">The bushfire hazard remaining within the site should not be considered in isolation of the bushfire hazard adjoining the site and the access to the site. Further, BAL construction standards focus on asset protection, and this should not be incorrectly equated with a lower risk to people and the subject site.</p> <p data-bbox="412 424 1189 639">Ultimately, there is inadequate physical separation from the extreme bushfire prone vegetation within 150 metres of the site boundary. Studies of past bushfire events demonstrate 85% of fatalities occur within 100 metres of extreme bushfire level vegetation, source: Blanche, Raphaelle, et al. "Environmental circumstances surrounding bushfire fatalities in Australia 1901-2011." <i>Environmental Science & Policy</i> 37 (2014): 192-203.</p> <p data-bbox="412 647 1227 863">The proposed development does not demonstrate appropriate design that would ensure bushfire protection measures can be achieved and that minimises the level of bushfire impact to people who are considered vulnerable. The likelihood of a bushfire, its severity and intensity, and the potential impact on life and property posed by the bushfire hazard at this location represents an extreme bushfire risk.</p> <p data-bbox="412 871 1218 1153">Some of the camp sites are located within BAL40/FZ. While it is acknowledged that A5.10 makes provision for a BMP to define camping sites as a tolerable loss in the event of a bushfire, DFES maintains the view that sufficient hazard separation should be provided to achieve BAL-29 or lower, particularly for vulnerable land uses, to preserve life and reduce the impact of bushfire on property and infrastructure. Furthermore, visitors may not view their assets as expendable and may endeavour to save them during evacuation.</p>	<p data-bbox="1263 220 1809 252">There has been no change to the BMP BEEP.</p> <p data-bbox="1263 260 2074 663">The BMP BEEP complies with the acceptable solution for Element 2, which is considered by the Guidelines for Planning in Bushfire Prone Areas, and therefore State Planning Policy 3.7, as meeting the intent of Element 2, where every habitable building has an APZ that achieves BAL-29. Tents and caravans are temporary buildings and are not bound by Element 2. Furthermore, a tent in BAL-29 will provide no further protection to the tents and caravans than if it was located in BAL-40/FZ as a tent and caravan will not withstand the radiant heat of 29 kW/m². Even if further vegetation clearing occurred to locate the tents in BAL-29, this will provide no additional protection and will potentially allow a false sense of security. All occupants of the camp ground will be required to evacuate early in the event of a bushfire.</p>

Issue	Assessment	Action
Vehicular Access	<p>A5.8.1 - not demonstrated</p> <p>While the road network provides access in two different directions to two different destinations, the BMP states that Jalbarragup Road complies with technical requirements. Evidence has not been provided to demonstrate that the bridge to the north of the site meets the requirements.</p> <p>It is noted that the public road system traverses areas of extreme bushfire risk and it is therefore imperative that appropriate access/egress is available.</p> <p>The BMP indicates that a map will be installed showing emergency evacuation routes. Details should be included to meet requirements of A5.8.1c.</p>	<p>There has been no change to the BMP BEEP.</p> <p>The bridge to the north of the Site is considered a pinch point, which is 4 m trafficable surface for a very short distance in relation to the remainder of the access way to the north of the Site. The bridge has good visibility and if required in an emergency situation, it is likely that the route will be used for all vehicles heading in the same direction, ie north away from the source of fire, well before the bushfire and therefore well before fire trucks are required to enter the Site.</p> <p>The evacuation route that is required to be installed is provided in Appendix F, as stated in the BMP.</p>
Extreme bushfire hazard applies	<p>Subdivision and development applications for vulnerable or high-risk land uses in areas of BAL-40/BAL-FZ will not be supported unless they comply with policy measure Clause 6.7.2 of SPP 3.7</p>	<p>There has been no change to the BMP BEEP.</p> <p>The development application complies with the requirements of the Guidelines for Planning in Bushfire Prone Areas. The State Planning Policy 3.7 is to be read in conjunction with the Guidelines, as per Section 4 of State Planning Policy 3.7, therefore allowance of the temporary buildings (tents and caravans) in areas of BAL-40/BAL-FZ should be considered a tolerable loss as it complies with the acceptable solution of A5.7b of the Guidelines.</p>
Bushfire Emergency Evacuation Plan (BEEP)	<p>The referral has included a 'Bushfire Emergency Evacuation Plan' for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.4 'Developing a Bushfire Emergency Evacuation Plan'. This contains detail regarding what should be included in a BEEP and will ensure the appropriate content is detailed when finalising the BEEP to the satisfaction of the Shire.</p>	<p>There has been no change to the BMP BEEP.</p> <p>The BEEP complies with the requirements of Guidelines Section 5.5.4 'Developing a Bushfire Emergency Evacuation Plan'.</p>

Issue	Assessment	Action
Refuge Building	<p>If the intent is to use any buildings on site as a bushfire shelter building, they should be designed to withstand bushfire attack in the form of wind, smoke, embers, radiant heat and flame contact. A refuge building needs to have a sufficient separation distance from the predominant bushfire prone vegetation to avoid exposure to a radiant heat flux exceeding 10kW/m².</p> <p>A building designated as a bushfire shelter must comply with ABCB Design and Construction of Community Bushfire Refuges (2014).</p> <p>Sheltering in a compliant refuge must be accepted as being a last resort option when it is no longer safe to evacuate to an area not prone to bushfire risk. It should be emphasised that a refuge is not a standalone solution to mitigating risk to life safety.</p>	<p>There has been no change to the BMP BEEP.</p> <p>There is no Refuge Building proposed as early evacuation in the event of a bushfire is required.</p>