

10/02/2021

The CEO Nannup Shire

Mr David Taylor

Nannup

Russell Keillor

60 Orchid Place

JALBARRAGUP

RE: Development Application 40 Rivergum Way Darradup

Dear Sir

I wish to convey my objection to the proposal of a private airstrip at 40 Rivergum Way, Darradup.

Firstly, the application process needs to be postponed for two reasons:

1. The very late advertising of the Special Meeting to be held tomorrow 11th. Advertised on 8th. Hardly time for interested parties, ratepayers and others to assess and respond.
2. Until the requested "input relating to impacts on quality of habitat and native fauna in the area" response has been received from DBCA and assessed, as per Agenda.

Notwithstanding the above, I believe the majority of residents at Darradup are against the development and for this reason alone, all elected councillors should reject the application.

The Darradup residents have bought properties there because of the pristine environment. Do councillors who will not be adversely affected by aircraft operations at Darradup need to be imposing this on the Darradup residents?

If a private airstrip was proposed to be built 200 metres from the Nannup townsite, would it be approved? I think not. Indeed, if there was an application for an airstrip adjacent to your own properties, would you vote to approve it?

There is a perfectly good airstrip not far from the property. I have used it. I have never had access issues to it. He can use it. Flying to the Nannup Airstrip from wherever and driving the last 18km is hardly a burden.

This proposal provides no benefit to the people of Darradup, only to the applicant who will not be a full-time resident at the property. The rejection of the application will mean the applicant will have to drive to his holiday home, like every other holiday home owner in the shire who does not wish to avail themselves of the perfectly maintained, safe, conveniently placed, Nannup Airstrip.

This application has and will create further division at Darradup.

This proposal may well create an unwanted precedent within the Shire of Nannup.

As a Commercial Pilot of nearly 30 years and a retired agricultural pilot, I can advise you from an experience point of view that there WILL be impacts on the local wildlife. I have put more than a few

kangaroos (and sheep) through fences that have sustained broken legs or necks. There will be flocks of Cockatoos scared into flight, some of which will take flight from nests. I have seen this on many occasions when taking off. FACT.

Finally, A Beechcraft Baron, as proposed in the application, is not a quiet aircraft. Regardless of the noise data provided by the applicant, which I believe are taken at a distance of 2.5km away, when that aircraft is at full power on take-off, there will be a significant noise impact to surrounding properties. FACT.

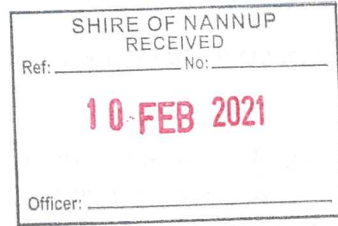
Please listen to the residents/ratepayers of Darradup and reject this application.

Your sincerely

Russell Keillor

JALBARRAGUP

Cc: All Councillors



Martin Pollock
37 Wattle Place
Darradup WA 6275

9 February 2021

CEO
Shire of Nannup
PO Box 11
Nannup WA 6275

Attn : David Taylor - CEO

Dear David,

**RE : Development Application – Lot 2 (40) Rivergum Way, Nannup
Proposed Private Airstrip (your ref : A770)**

Thank you for your letter 27 January 2021 regarding additional information for the above referenced Development Application.

Kim and I still strongly object to the proposal in total.

Due to the scope of the additional information provided, please table the following comments and some expansions on our previous submission.

Frequency of Use

The revised annual total of 120 still equates to more than two flights per week with the potential for more than this on any given day.
Who and how will this be monitored and controlled and what actions would occur if more frequent flights did take place? At present we struggle to get any shire assistance in Darradup with simple maintenance requests.

In your meeting agenda, page 4, Comment: A) Overview, point three, it is written that "It is suggested the private airstrip should not detrimentally detract from the amenity of the local area including..."

The twenty property owners in Darradup area that you sent letters to in the first submission would strongly argue that you are terribly mistaken considering the complete objection to the proposal by those property owners.

If an airstrip was built 200 – 400m from your tranquil idyllic home or that of your council members in the country would you consider this to "not detrimentally detract from the amenity of the local area"?

Why don't you bring your council members to our peaceful home and try to enjoy a quiet morning/afternoon with the wildlife, specifically the Red Tail Black Cockatoo's as they fly across our property and Lot 2 (40) Rivergum Way to and from their nesting/feeding areas every day, whilst a rotary engine aircraft winds up to maximum revs and flies across the path of those birds and into our line of sight, over Jalbarragup and off to the North?

I'm sure it's not going to detract at all from your life or the life of your council members from where they sit!

Also in your agenda, page 6, Monitoring flight numbers, you have stated that "any pilot using the airstrip is required by law to maintain a flight logbook" which is correct and in your RECOMMENDATION page 10, it is stated that "the logbook must be made available to the local government for review" but how will this be conducted, by whom, how often and will it be public knowledge. How will this be enforced if the 120 flights per annum are exceeded and by how many flights above 120 per annum are considered unlawful?

Fire Risk

The Shire has RECOMMENDED "The applicant shall prepare and implement a Bushfire Management Plan to the satisfaction of the local government prior to the use of the airstrip".

You have also stated "The property is located within a bushfire prone area as designated by the Fire and Emergency Services Commissioner".

We would like to see written approval of the Bushfire Management Plan from the Fire and Emergency Services Commissioner before this proposal passes council not after the airstrip is constructed!

Noise Impacts

As discussed today you believe this has been addressed by "acoustic expert advice" provided to you by the applicant.

This same expert referenced the maximum noise level at take-off would equal that of a ride on mower (approx. 90dB) after clearly stating that the noise levels of the proposed aircraft models were recorded at 300m and 2500m.

Please ask this "expert" to take readings of the ride on mower at 2500m and re-evaluate his comparison and then ask him to relocate our home to 2500m from that maximum dB aircraft take-off point.

Also discussed with you today is the significant health impact of high pitched, high dB noise on Kim who suffers from noise induced tremors and seizures due to the affliction of Multiple Sclerosis.

You asked if the duration of the noise also has the same impact because you believe the duration of the aircraft noise is acceptable ref 120 p/a take-off and landings.

Do you also believe that the aircraft will not taxi along the length of the 900m airstrip, idle during pilot checks and undergo maintenance and testing during it's life at Lot 2 (40) Rivergum Way?

We have been awaiting supporting documentation from MSWA and insist that you postpone this agenda until the council has the opportunity to consider any and all supporting documentation.

This is a response from Mr Ron Brent MS Australia received 9th Feb 2021:

"There are a few important and critical points that should be made to the Council before their meeting on the 11th.

These are:

The noise levels and comparisons provided are deeply flawed. The figures

provided for ride on machinery such as lawnmowers and tractors are for the operator sitting on the machine. The noise levels provided for aircraft are from overflight at a considerable height, beginning at 136m but in some cases significantly more. The issue in this case not the noise for those sitting on the plane and nor is it the noise level from overflight. The noise level of concern is the take off noise as the aircraft proceeds along the runway under full throttle and the noise at lift off. This is the noisiest part of the flight and because the noise is adjacent to properties it is significantly intrusive. Noise standards generally do not assume that there will be houses and private properties immediately abutting the runway at a distance of less than 400 or 200 m (depending on which property is under consideration).

Reference to 120 take-offs and 120 landings (which would be described in aviation terms as 240 movements) is also flawed. These movements will not take place evenly spaced across a year, at less than three per week, as is implied by the numbers. They will take place over a much shorter period when those with Pilots licences are in residence at the property which will not be occupied 365 days a year. Therefore there will be periods with much more intensive movement and other periods with much less traffic. The impingement on surrounding properties will be from the busy times.

The emissions and pollution issue is also misconceived. Pollution levels from aircraft are not unduly high in comparison to similar sized engines in ground based vehicles. Importantly, however, the fact that they are released above the height of roofs means they have significantly greater impact on water collections from those roofs than do emissions from vehicles at ground level.

There is no detail on the approaches to and departures from the runways that will be used by aircraft landing and taking off. Aircraft must land and take off in the direction that goes into the wind when there is even as little as 5 knots of breeze. This will mean that there will be situations when an aircraft arrives from one direction but must Land in the opposite direction. There is no detail as to how aircraft will approach and leave the runway in various wind directions and weather conditions. For an airport detailed plans for approach and departure routes and directions would be considered.

There is no mention of ground running noise. Independently from the takeoff and landing (which, as noted above, are the noisiest parts of the flight) aircraft have various reasons to run engines for periods while on the ground. Much of this is what is known as "engine run-ups" as part of maintenance schedules, and is likely to occur at airports with maintenance facilities. On the other hand there will also be ground running as aircraft are prepared for take off and after they land. This is an additional noise impost for those living directly adjacent to a runway that has not been discussed.

In short I believe that the council will be making a decision based on isolated bits of data provided without appropriate context and using invalid comparisons and assertions. I am basing this assessment on my experience as **Australia's Aircraft Noise Ombudsman over a period of six years**. While I'm not saying this runway is inappropriate, I am saying that there needs to be much more careful consideration and a review by someone who understands how aircraft operate and how aircraft noise and pollution issues impact on surrounding

communities.

I hope this is of some assistance to you, and Council, in ensuring proper consideration of this matter. I am happy to be quoted and/or for you to submit this email. Please note that I have not made any comments relating to your particular sensitivity to noise. This is a difficult issue with arguments on both sides as to whether it should be relevant to the Council. Importantly though, the above issues are based on the impact that the runway will have on any neighbours in the numerous properties that abut the runway and those properties just behind them, such as yours.

I'm not sure that there is much more I can do in the time available, but will give you my phone number in case it is of any value.

Best wishes,

Ron Brent"

Fauna

The local area is a known breeding ground for the endangered Red Tail Black Cockatoo. Apart from the loss of habitat from any land clearing, the noise impact on the nesting sites are going to be significant.

No amount of talk will change our views on this and the local council do not have the authority to make this decision without documented approval from the Department Of Parks And Wildlife.

This is the part where we get the environmental groups and media involved to escalate your "conditional approval of this development application" to the appropriate authorities.

We believe a 12 to 48 month wildlife study should significantly improve your understanding of the gravity of this dire situation for the Red Tail Black Cockatoo.

Summary

We strongly object to the proposal in its entirety.

The risks inherent in the proposal are not acceptable within a Rural Residential area where none of these risks currently exist.

The detriment of amenity and lifestyle for us is not a price worth paying for the benefit of the applicant.

Regards,

Martin Pollock and Kim Koeman

Jane Buckland

From: Sue Cranstoun
Sent: Wednesday, 10 February 2021 10:26 AM
To: ShireofNannup; David Taylor; Shire President; Deputy President; Cr Cheryle Brown; Cr Chris Buckland; Cr Vince Corlett; Patricia Fraser; Cr Vicki Hansen; Catherine Stevenson
Subject: Development Application for Darradup Airstrip

Sue Cranstoun
108 Helyar Road
PO Box 262
Nannup 6275

CEO and Councilors
Shire of Nannup
PO Box 11
Nannup WA 6275

Dear Mr Taylor et al

Re: Development application - Lot 2 Rivergum Way, Nannup. Proposed Private Airstrip Ref: A770

Thank you Mr Taylor for your letter 27 January 2021 regarding additional information for the above proposed development.

I wish to reiterate my objection to the proposal.

Basically several of the concerns from my previous submission relating to adverse environmental and community impact have not been addressed adequately. The manner in which the Shire has arrived at its position, as stated in the agenda posted on 8th February, is also difficult to understand. How can the Shire and its councilors give fair and just credence to the community's serious concerns that are submitted after 8th February? How too can an objective and informed proposal be constructed by the Shire's representatives without professional assessment?

Despite Mr Ebeling's most recent communication I remain concerned about the vagaries and sometimes deception of the Development.

- The Information provided by the proponent relating to the type of aircraft, noise level and contaminate emissions is difficult to understand. As I understand it, details of noise levels that near neighbours experience have not been addressed. There is also some irrelevant information about noise levels at certain distances, none of which relate to the immediate take off or noise within close proximity to abounding properties. This is deceptive.
- Secondly the establishment of a grassed area alongside the airstrip will not change the fact that the contaminants enter nearby waterways, namely the Blackwood River, an important Aboriginal heritage site. This is deceptive and meant to influence residents' view of the environmental impact.
- The clearing permit referred to has also expired on the 8th February. Another deception.

I still have many other unanswered questions relating to the Shire's position:

In the Shire's planning document, namely the Local Planning Strategy of 2018, as outlined so eloquently by the submission of Glen Davis, it states the Shire is committed to preserving " *the health, safety and general economic and social well-being of the community and amenity of the area* " .

- *How then does the Shire justify approving Mr Ebeling's development without undertaking this commitment diligently and with legitimate assessment by credible authorities?*
- *Why sacrifice the peace and tranquility of so many Darradup residents and the health of this pristine environment for the sake of one, wealthy future resident who perceives he is entitled to such privilege - convenient travel? He has no such right in a democracy!*

- *Why has the Shire sabotaged the Darradup and general community of Nannup's opportunity to respond to such a development by failing to not only advertise the issue extensively but by formulating a proposal before final submissions close thus preventing thorough consideration of all submissions?*
- *Why set such a precedent to allow an airstrip within close proximity to existing residents?*
- *What motivates the Shire to pay such a price and sacrifice its commitment to preserving the unique community and surrounds of Nannup?*

To my mind the Shire's proposed acceptance of the development, as per the agenda on their website, shows a very significant breach of their bylaws and a morally deplorable position that fails to responsibly consider both the well being of environment and its residents in general. There has been insufficient investigation into the possible adverse effects on both the environment and its residents. The traditional owners too have not been consulted regarding the heritage site of the Blackwood River.

In conclusion and simply stated, I believe the Shire is willing to accept the demands of one person who believes he is entitled to have what he wants at great cost to the Darradup community and the biodiversity of our pristine environment. His mere desire to commute quickly takes precedence over any other consideration. To me this is deplorable. The fact that the Shire is willing to accommodate his selfish demands also demonstrates a negligence of their duty to represent the broader community. This is morally unacceptable and possibly illegal.

I maintain my opposition to the proposed development of an airstrip that not only fails to contribute to the well being of the community but is yet to legitimately assess the possible adverse impacts on the environment.

Yours faithfully
Sue Cranstoun

Jane Buckland

From: Rick BRUCE
Sent: Tuesday, 9 February 2021 6:31 PM
To: ShireofNannup
Subject: Development App. - lot 2 Rivergum Way

Attention David Taylor CEO Nannup Shire

Dear David

With the provision of additional information it has not changed my opposition to this development application .
The same situation exists except for an inclination to have less flights per year to approx. 120 and moving the airstrip approx 155m .

Will the number of flights be monitored ?

This development is for the benefit of the applicants only while in the original submissions a majority of these were against the proposal. So why should the amenity of one title have more sway than the rest of us who moved here , some long ago , over the amenity of the majority ?

There is another airstrip near town which could be used.

This development provides no benefit for the local community and in fact has many disadvantages such as noise, habitat disruption , bushfire risk , land clearing and gravel mining .

The Nannup local planning strategy aims to provide sustainability and a minimisation of conflict of land uses which does not seem to be the case here . A quiet lifestyle of 20 to 30 titles will be affected with this because one title has the desire to build this and have an effect way into the future .

The agenda put forward from the office appears to be in favour of the development even when the time for presenting submissions has not finished . This appears presumptive and fly in the face of an honest processing of the submissions ..

The airstrip is proposed while being surrounded by national parks, rivers and a rich flora and fauna .
The birds most numerous in flocks are the white and red black cockatoos and often numbering 30 or sometimes many more , creating an obvious danger to flying aircraft.

This development sets a precedent in that any one with a desire to have an airstrip and has a 100 acres or so will be able to do so . Would the Nannup town like one on the edge of town ?

This is a rural residential area and I think should remain so The Shire council has a responsibility to follow the spirit of the planning strategy and be democratic

Yours faithfully
Rick Bruce

SHIRE OF NANNUP RECEIVED	
Ref: _____	No: _____
10 FEB 2021	
Officer: _____	

ATTENTION:

Nannup Shire CEO and Councillors

I write with regards to the ***Development Application to construct a bitumen driveway/private airstrip at Lot 2 Rivergum Way, Darradup.***

In as much as finding the basic concept of an airstrip objectionable, in light of recent clarification of some issues by the Proponent; I would like to make several observations and comments:

1. In the event of Shire approval of the Development Application (with that Development Application having met appropriate criteria); the ***“Option 2”*** location for construction would demonstrate the neighbourly consideration often stated by the Proponent and demonstrate the Shire Council’s support for a considered ***‘buffer’*** for neighbouring properties.
2. It is prudent to ***attach, by legal instrument***, any ***conditions*** agreed to (principally ***the prohibition of any night time aircraft operation***) to the ***property Title*** so as to ensure any future owner conforms.
3. With regard to the sealed road connecting to Helyar Road; I suggest that existing stormwater drainage on Helyar Road be evaluated and upgraded. This is in pertaining to the periodic, significant run-off from the new and extensive area of sealed surface; thus, circumventing possible hazardous traffic situations that may likely result.
4. It should also be noted that if this Development Proposal is approved by the Shire, ***water used in construction*** ought to be sourced from a supply clearly authorised by relevant regulatory agencies.

Regards,

Peter Schmidt (Ratepayer)
35 Wattle Place
Darradup, WA 6275

Tuesday, 9 February 2021



Dear David,

RE: DEVELOPMENT APPLICATION – Lot 2 (40) Rivergum Way, Nannup. Proposed Private Airstrip

Thank you for your correspondence on the 27th of January regarding the additional information for the above Development Application.

I wish to still register my **strong objection** to the proposal in total.

I would like to respond to the additional information that has been provided and restate my comments from my previous submission with some additional concerns.

Our Property

Lot 14, 21 Rosella Close, Darradup shares a boundary fence with Lot 2. This development application directly affects our property and lifestyle. As previously stated, we moved out here for the peace and quiet, natural environment and privacy. We are deeply concerned that approving this airstrip will deeply affect or personal lives in a negative way. This is our sanctuary and a place that has a positive effect on our mental health. We value the rural residential lifestyle which attracted us to this very property in the first place. We research many Shires and decidedly choose Nannup as it defined in its Local Planning Strategy (2018) many values that we were looking for such as one that would “protect the health, safety and general economic and social well-being of the community, and the amenity of the area”, “Minimise the future land use impact and subsequent conflicts”, “Provide for a high level of residential amenity which reflects a non-metropolitan lifestyle and rural character”. This proposal does not support these values in any way.

Bush Fire Risk

My worry for bushfire risk remains a serious concern. There has been no evidence of a bush fire plan or emergency evacuation plan stated in the applicant’s submission, which is highly concerning. This absence of planning is in direct disagreement of the Shire’s Local Planning Policy LPP21 – Bush Fire Management which states *“The Council will adopt a precautionary approach to fire risk. To achieve this the Council will require proponents seeking planning development of subdivision, scheme amendment, structure plan, building permit approval and other works to take account of fire risk with their proposal.*

Lot 2 and the surrounding area is located in and declared “bush fire prone area” by the Fire and Emergency Services Commissioner. Which is further outlined in the document prepared by the Shire as the Bush Fire Hazard Strategy (2012). This strategy, with assessed maps has deemed this area to have moderate to extreme bush fire hazard levels.

I do not find this development application to meet the basic requirement of bush fire precautionary approach nor does it suggest how it may respond in an emergency. In fact, I believe that approving a private airstrip with aircraft that use this, as well as housing combustible materials on the property poses severe risk to residences, lives and native animals and habitats. The submission states “the owners will not be at the property at all times and is a holiday home”. Which concerns us greatly that mitigating a fire will not be possible and will further increase the risk of bushfire management.

This would affect our immediate rural residential property, Darradup community and have the potential to impact residences in Jalbarragup and even Nannup. After the recent fires in the area, which was started by lightning, our whole community was placed by DFES as a code red and in an emergency warning. We evacuated our home and went to the evacuation

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centre in Nannup for two nights until the fire was downgraded to a code yellow watch and act. I feel that having this development approved would unfairly increase our risk of fire which is not acceptable.

Regularity of flights

The revised total indicates an annual total of 120 takes offs and landings. The submission application states *"Multiple movements won't occur on a day, a few at best occasionally, and then within the 120 take offs and landings per year."* Which would suggest that multiple plane movements could occur on any given day and probably will.

I have read in the special meeting agenda minutes that the Shire would require a 'flight logbook'. Will this be the main record keeping mechanism? I understand that it is the law to keep accurate and up to date records of all flights under the aviation act, and such book should be provided and made available for review as requested by the local government. I would like to know if this will be an annual/bi-annual or any time period scheduled review? Who exactly will be requesting and reviewing these logbooks? Will the flight information be made available to the public? How does one request this and what evidence is needed to support the entries in the logbook? My concern is that 'it's our word against theirs'. Even governed by law, human error in recording flight information is a reality and what can be done if the numbers don't equate?

Noise

The applicant has provided much information on the impact of noise. I do not understand much of this data or measurements. Do you? What I do know is the sound of a light aircraft flying overhead. In the recent fires our skies were a buzz with a raft of fixed wing bombers and choppers, all doing a tremendous job at fighting the fires on our doorstep. I could hear them loud and clear. There were many aircraft in the sky, but there was never any more than one at a time and it was deafening. It even shook our house when they passed straight overhead. These planes were lightweight, fixed winged aircraft – similar to the applicant's many aircraft he identifies in his response to the Shire of Nannup and VERY NOISY! To the point we left the property to get away from the noise. The aircraft that we fly are Beechcraft 58, Evektor Harmony Light Sport Aircraft, Extra NG and perhaps another Light Sport Aircraft, occasionally a Cessna or similar". These are all Maximum Take Off Weight (MTOW) of 5,700kg none of which indicate the horsepower or capacity of the engine which would tell me more about actual noise levels.

The sound data depicts two test methods, as pointed out by my neighbour. One measure at an overfly height of 300m, and the other at a maximum power take off of measured at 2.5km. Our residence (Lot 14) is only approximately 200m from the updated current airstrip alignment, so I ask what would be the real noise we would be exposed to? As there is no data provided from actual take-off and landing site (which we would be experiencing), how can noise not be considered as an actual encumbrance on our daily lives? As there is no data of noise closer than 2.5km of residential buildings, is it then inferred that airstrips should not be constructed within that area due to obtrusive noise? I am not convinced that the noise level of these aircraft will not be a total annoyance on our lives and believe more true and accurate data is required.

Environmental Impact

This area is home to many threatened and endangered species proudly only found in the South-West of Western Australia. Animals previously identified as the Red-tailed Black Cockatoo, Carnaby and Baudins black cockatoos and the phascogale to name a few. Further land clearing and impact from construction and aircraft activity will have significant impact on the habitat and lives of these precious animals. I am aware that the current owners have an existing Clearing Permit 8205/1-File Number DWERVT1491 authorising the clearing of 60 Eucalyptus Marginata trees (commonly known as Jarrah) of which apparently

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only "12 out of the 60 have been cleared thus far". The native vegetation that would need to be cleared in order to have the original plans 6.1.2 or the updated plans 6.1.5 constructed would need to clear more than just the jarrah trees. There is a number of established Jarrah, Marri, Sheoak, Snotty gobble, Banksias and more that create a biodiversity hotspot for all fauna and flora in this area. I thank the applicant for the offer to register a 2ha Conservation Covenant in order to mitigate any land clearing but it's just not going to cut it. It would not be possible to clear any of the bushland on the property without clearing more than just the Jarrah trees. The aerial maps indicate the biodiverse areas and on inspection it is plainly obvious. Clearing more land will directly impact the lives and survival of known roosting spots in these trees. Just because you own a permit to clear irreplaceable trees, doesn't mean you should.

In Summary,

I Amy Mason and Manu Mason are strongly objecting to the proposal of an airstrip at Lot 2, Rivergum way in total

This proposal is in direct conflict with the Shire of Nannup Local Planning Strategy (2018). '2.1.f Our Sanctuary, 2.1.g Our location, 2.1.h Our sustainable future'.

The impact to our lives and properties will have a negative and detrimental effect on all aspects.

The local flora and fauna should be conserved and protected for our futures.

Bush fire risk has not been considered and the inherent risks to properties and lives is too great.

Please help protect and support our beautiful place we call home, Darradup.

Thankyou,

Amy Mason and Manu Mason



Glen Davis
RMB 746 Helyar Rd
Nannup WA 6275

7 February 2021

CEO
Shire of Nannup
PO Box 11
Nannup WA 6275

Attn : David Taylor - CEO

Dear David,

**RE : Development Application – Lot 2 (40) Rivergum Way, Nannup
Proposed Private Airstrip (your ref : A770)**

Thank you for your letter 27 January 2021 regarding additional information for the above referenced Development Application.

I still wish to register my objection to the proposal in total.

Due to the scope of the additional information provided, I forward the following comments and some expansions on my previous submission.

Perceived Need

The proponent has stated “... *the private airstrip is a necessity for our required use of the property.*” There is still no justification as to the “necessity” of the proposal other than the proponents own convenience.

The proponent has also stated “...*private airstrip is an “ancillary use” for the purposes of accessing the farm from Perth and for local flying.*”

As the intended use for the airstrip is only to provide personal access to the property this is neither incidental to, nor generally associated with, rural residential use. It cannot be deemed an ancillary use.

The Australian Courts have considered these issues and have stated “*that there is a world of difference between using motor vehicles for personal transport to and from home and using helicopters or other aircraft.....that as a matter of common knowledge, helicopter or aircraft use in association with residential premises is very rare and different in character and impact from ordinary residential uses.*”

Land Usage

The Shire of Nannup Local Planning Scheme No 3 (2007) shows the subject land zoned as Agricultural.

The Shire of Nannup Local Planning Strategy (2018) maps indicate the subject land as Rural Residential. The Local Planning Strategy (2018) will provide strategic direction for the next Local Planning Scheme No 4. As such it would seem that the Shire of Nannup’s

intention is that the subject land is for Rural Residential use and will not be subject to further subdivision.

The proponent states *"The owners will not be at the property at all times as it is a holiday home."* Hence the subject land will be used for Rural Residential purposes which is in keeping with the Local Planning Strategy (2018). Therefore the Development Application should be considered on the basis of the property being used for Rural Residential purposes and all the aims, strategies and actions of the Local Planning Strategy (2018) should apply.

Frequency of Use

Thank you for the clarification on flight movements to a revised annual total of 120. What mechanisms does the Shire propose to monitor the number of flights and what actions would occur in a breach.

The proponent states *"Multiple movements won't occur on a day, a few at best occasionally, and then within the bounds of the 120 take-offs and landings per year."* So it would appear that multiple plane movements may well occur on any given day.

What is not clear however is if there will be multiple aircraft on site at any one time. Council records show that in a previous Development Application that the following advice from the Shire's Planning Consultant was provided to Council:- *The Shire of Nannup Local Planning Scheme No. 3 (LPS3) does not permit the parking of two or more trucks and the operating a transport business (transport depot) on land within the Special Rural Zone. LPS3 defines a "transport depot" as follows: "means premises used for the garaging of motor vehicles used or intended to be used for carrying goods or persons, or for the transfer of goods and persons from one motor vehicle to another of such motor vehicle and includes maintenance, management and repair of the vehicles used, but not of other vehicles, and may include overnight accommodation on-site for the transport workers."*

The same logic should apply to the keeping of 2 or more aircraft on the property at any one time.

Bush Fire Risk

The Shire has prepared a Bush Fire Hazard Strategy (2012). The Bush Fire Hazard Assessment Maps associated with this Strategy show the subject land to have a moderate to extreme bush fire hazard level.

The Shire's Local Planning Policy LPP21 – Bush Fire Management states:- *"The Council will adopt a precautionary approach to fire risk. To achieve this, the Council will require proponents seeking planning (development), subdivision, scheme amendment, structure plan, and building permit approval and other works to take account of fire risk with their proposals."*

I can find nothing in the submission relating to bush fire risk and I believe this should be investigated further in line with Council's precautionary approach in LPP21. I believe that any increase in bush fire risk is not a fair burden to be placed on the local residents in a rural residential area, especially for a proposal that is not "necessary". Any increased risk would not only affect the residents of Darradup but Jalbarragup and potentially Nannup as well. The recent Darradup and Perth fires would highlight that any increased risk is not acceptable.

Noise Impacts

The proponent has provided much data on noise levels far beyond the average lay person to interpret. I trust the Shire will adequately review this data and seek professional advice if required to fully understand the impacts.

One thing I would note from the sound data is that there appears to be two test methods, one measured at an overfly height of 300m, the other at a maximum power take off but measured at a distance of 2.5km. As some residences are less than 200m from the proposed airstrip, I would ask what is the real noise level at these residences and not 2.5km away?

There would appear to be no noise data on noise levels actually generated at the airstrip itself during take-off which is the real noise that the residents will be subjected to.

The Proponents Aviation Consultant does state that for the actual take-off sequence *“the noise levels might be described as notable.”* To me, “notable” implies noise levels well in excess of those provided.

Could it then be inferred that an airstrip should not be constructed within 2.5km of a residential building because of the noise impacts within that area?

I believe the true nature of the noise impacts need to be better understood.

Land Clearing

It is evident that land clearing will be required for either airstrip option proposed. Remnant vegetation on the subject land would be significantly affected by this proposal. I note that the Local Planning Strategy (2018) section 4.5 Native Vegetation, Conservation & Environmental Corridors sets out Council’s aims in this regard. In particular:- 4.5.A17) *minimise clearing of native vegetation and promote biodiversity.* I trust Council’s stated strategies 4.5, S23, S24, S28, S29 and S30 would apply.

It is also noted in the additional material provided by the Proponent that construction material is to be excavated on site. The extent of any excavations for any raw materials has not been indicated. Will this operation require additional approvals?

The proponent has advised that a Department of Water and Environmental Regulation Clearing Permit 8205/1 exists for the property. DWER records show that the permit is for clearing for grazing and pasture purposes and expires on 8/2/21. It would appear that new authority to clear will be required for this proposal.

Will the Shire be referring this proposal to the EPA for consideration?

Flora and Fauna

The local area is a known breeding ground for the endangered Red Tail Black Cockatoo. Apart from the loss of habitat from any land clearing, the noise impact on the nesting sites could be significant.

The proponent has offered to register a 2ha Conservation Covenant in order to mitigate any land clearing. Whilst this offer is applauded, it in no way mitigates any land clearing. Habitat loss is still habitat loss.

In 2009, WALGA and DEC released a report entitled “South West Regional Ecological Linkages” (SWREL). The Blackwood River was identified as one of these ecological links. Council has previously received advice from DEC on proposals along the Blackwood River as follows:- *“Remnant vegetation is important as a wildlife refuge and provides a corridor with nearby areas of remnant vegetation. The remnant vegetation on the property is identified in Molloy et al, 2009, as being part of and contributing to a core regional ecological linkage i.e. the vegetation is part of a linkage axis line and has a 1a proximity value. Any development within a 1a category should aim to minimise impacts and fragmentation of the vegetation within the property and to adjoining vegetated areas.*

DEC datasets indicate that is likely to contain remnant vegetation which is potential habitat for the Black Cockatoo. Black Cockatoos are listed as threatened species under the Commonwealth of Australia's Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and Western Australia's Wildlife Conservation Act 1950. Major threats to Black Cockatoos include habitat loss and fragmentation.

Will Council have regard for the SWREL Report and refer the proposal to DBCA in accordance with Local Planning Strategy (2018) section 4.5. S28

The proponent has provided commentary on the risk of bird strikes as follows:- *"the primary risk areas around aerodromes occurs when large numbers of birds are attracted in the close vicinity of the take-off and landing approach paths due to the presence of food sources or specific nesting habitat within the immediate areas surrounding runway ends."*

As I see it this is exactly the situation in this proposal. We have known habitat nesting sites, we have water and a potential additional food source in the form of the 20m wide grassed areas adjacent to the bitumen airstrip. I would think all the factors relating to bird strike exist in this proposal.

Airstrip Design

The Civil Aviation Authority provides Guidelines for Aeroplane Landing Areas.

The Guidelines state *"a runway length equal to or greater than that specified in the aeroplane's flight manual or approved performance charts or certificate of airworthiness, for the prevailing conditions is required (increasing the length by an additional 15% is recommended when unfactored data is used).* No data has been provided to determine the adequacy of the runway length proposed.

The Guidelines also refers to the longitudinal slope of the runway as follows:- *The longitudinal slope between the runway ends should not exceed 2%"*

A 2% slope equates to a 2m fall for every 100m length of runway. Over a 900m long runway this would give a total fall of 18m. However, from the information provided by the Proponents Surveyor, the ground level at the top of the runway is at 75m AHD and the ground level at the 900m mark is 40m AHD. Giving an existing fall in ground levels of 35m well in excess of the 18m fall required. The last 100m from the 800m mark to the 900m mark fall from 55m AHD to 40m AHD, some 15m drop in only 100m. It may therefore be only feasible to construct a runway 800m long in the existing terrain.

The Guidelines also require an approach and take-off area extending 900m from the ends of the runway. This is outside the property boundary subject to this proposal. This approach and take-off area is to be clear of objects (including trees) above a line extending at 5% from the end runway level. It would appear that to achieve this requirement clearing of State Forest at the end of the runway would be required. Has DPAW, as adjacent land managers, been consulted regarding this proposal.

I believe a more detailed runway design is required to fully assess the impact on the subject land and beyond that into the State Forest.

The proposal also incorporates a 20m wide grassed strip on either side of the runway. This raises two concerns.

Firstly, is the grassed area to be reticulated with a water supply to provide grass cover all year round. If so, then it will provide a new food source for flora and fauna alike. This would add to the risk of bird strike and encourage other grazing fauna such as kangaroos

to the runway area also increasing the risk of collision during landing. In addition, should we be using a valuable water resource for the purposes of watering a grass verge.

Secondly, if the grassed area is not reticulated, then what prevents dust pollution created during landing and take-off from being an issue for adjacent residents. I do believe clarification on this issue is required to properly assess the implications.

Stormwater Drainage

The site is immediately adjacent to the Blackwood River and any runoff flows towards the river. Water quality and quantity entering the Blackwood River should be a consideration.

The bitumen area alone measures 20m x 1,000m and covers 2ha of land. The same size as my entire property. Stormwater runoff from a sealed pavement of this magnitude is going to be significantly more than that from the existing pasture and will need to be effectively managed.

Amenity and Lifestyle

All the surrounding properties and residents enjoy a Rural Residential lifestyle. Many have enjoyed the natural environment and the tranquillity for over 50 years. The proposal will impact a significant number of people with no benefit to the local area or natural environment.

Some of the aims of the Local Planning Strategy (2018) are to:-

- *“protect the health, safety, and general economic and social well-being of the community, and the amenity of the area.”*
- *“minimise the future land use impact and subsequent conflicts.”*
- *“provide for a high level of residential amenity which reflects a non-metropolitan lifestyle and rural character.”*

This proposal is not in keeping with these aims in any way at all.

Existing Nannup Airstrip

The use of the existing airstrip is still seen as a viable, realistic and balanced alternative to the current proposal. This airstrip is already used by a number of existing residents. DPAW seems to have no problem providing free and unfettered access to the airstrip.

As a precedent has been established in the use of the existing Nannup Airstrip, it would seem sensible to continue with the current arrangement.

From a Planning perspective, it prevents ad hoc determinations whenever a new Development Application of this nature is received. From an environmental perspective, all the infrastructure exists at the Nannup Airstrip. No further raw materials are used along with the associated carbon footprint. From a safety and bushfire risk perspective, all the risks are contained within the existing facility. No additional risks are imposed on the subject land and the adjacent land owners and residents.

Summary

I reiterate my objection to the proposal in total.

The proposal is not in keeping within a Rural Residential area.

The risks inherent in the proposal are not acceptable within a Rural Residential area where none of these risks currently exist.

The proposal is not necessary for the stated use of the subject land. The “necessity” of the proposal has not been shown. There is no benefit to the local area nor the Shire as a whole. The proposal is one of personal convenience.

The loss of amenity and lifestyle for the more than 30 existing land owners and residents is not a price worth paying for the benefit of the proponent alone having regard for the aims, strategies and actions of the Local Planning Strategy (2018).

An alternative exists in the form of the Nannup Airstrip.

Finally, I would add that, the Shire of Nannup Local Planning Strategy (2018) has a vision. Part of that vision states:-

- 2.1.f) Our Sanctuary – we will protect our amazing nature, magnificent forests, managed bush land, rivers, waterways and wetlands, agriculture and our pristine coastline.*
- 2.1.g) Our Location – keep our beautiful combination of natural landscapes and built environments to retain our community and amenity.*
- 2.1.h) Our Sustainable Future – to achieve a green clean future.*

So I would ask, protect Our Sanctuary, Our Location and Our Future.

Yours Faithfully,

Glen Davis

Jane Buckland

From: Librarian
Sent: Monday, 8 February 2021 8:08 AM
To: David Taylor; Jane Buckland
Subject: FW: Development Application-Lot 2{40} Rivergum Way, Darradup

-----Original Message-----

From: Dave Bennetts
Sent: Monday, 8 February 2021 8:00 AM
To: ShireofNannup <nannup@nannup.wa.gov.au>
Subject: Development Application-Lot 2{40} Rivergum Way, Darradup

Good morning David

Thank you for the feedback on the above development proposal.

The concerns that Anne and I had have been addressed by the applicant.

Our position remains the same as before, that we welcome the proposed development application-
Lot 2{40} Rivergum Way, Darradup- Bitumen Driveway/Private Airstrip.

Yours sincerely

Anne and David Bennetts

22 Rosella Close, Darradup.

Jane Buckland

From: David Taylor
Sent: Monday, 1 February 2021 9:39 AM
To: Librarian
Subject: FW: submission to Darradup airstrip D.A.

ECM please

Kind Regards,

David Taylor
Chief Executive Officer



Adam Street . PO Box 11 Nannup WA 6275
P: 9756 1018 . F: 9756 1275.
www.nannup.wa.gov.au

From: blackwooddrivercanoeing
Sent: Sunday, 31 January 2021 3:39 PM
To: David Taylor <david@nannup.wa.gov.au>
Subject: submission to Darradup airstrip D.A.

Hi David

Thank you for the additional information, however I am still unsure on a few points.

Regarding noise levels - the volume and technical nature of Annexure A leaves me still none the wiser on how loud any aircraft able to land on the proposed strip may be. Is there to be an actual decibel limit that must not be exceeded? Neighbors are not too concerned about the noise of a plane cruising at 300m or take off noise measured from 2.5km away. What is meaningful is how much noise is there at the boundary fence during warm up, taxiing, take off and landing.

While it is reassuring that the aircraft CURRENTLY most likely to be used may not be too offensive the issue remains that in the future it is possible for other possibly more objectionable aircraft to be used. I will take the applicant's reassurances at face value but there would need to be protections from a future owner with different intentions

The applicant has stated that the bitumen airstrip/driveway is a necessity for the use of cars he may bring down and the application refers to sealing from the entrance gate to the airstrip. Will the access to the property from Helyar Rd (Rivergum Way or other easement) be sealed?

If the application is to be approved I would welcome consultations with the council over what operating conditions would be implemented.

Neville Hamilton
Loc. 11864

David Taylor

From:
Sent: Tuesday, 19 January 2021 1:15 PM
To: David Taylor
Cc:
Subject: Airstrip Proposal at Poteroo Farm (Ian and Davina Gibb)
Attachments: Letter to the Darradup Residents 120122.pdf
Importance: High

Hi David ,

My name is Stephen Goatcher and along with my partner Susan K Roche I reside at Lot 15/23 Rosella Close Darradup WA , Poteroo Farm(40 Rivergum Way) is on our Western Adjoining Boundary .

We first heard of the proposal from direct contact with Ian Gibb who explained the Proposed Buyers Intended plans for an airstrip installation on the property . Initially we had

apprehensions about the proposal but after considering all communications we have received along with the latest letter from Dieter regarding his intentions regarding the airstrip and

love for nice cars we support the proposal and have no issues as a land owner on an adjoining property .

I don't believe the aircraft landing and taking off will be any louder than Ian/Davina running up and down the current dirt road on their tractor or Quad motorbike.

Regards

Stephen Goatcher

Jane Buckland

From: Lindesay Blackburne-Kane
Sent: Monday, 18 January 2021 8:03 AM
To: Jane Buckland
Cc: David Taylor
Subject: Driveway & Airstrip Proposal 40 Rivergum Way

To: Jane Buckland, CC David Taylor

Further to our previous email regarding the proposed Bitumen driveway and Private airstrip at Potoroo Farm, 40 Rivergum Way, we have now sourced the information we required to clarify type of Aircraft and the likely frequency that the Airstrip would be used and are now completely satisfied that this usage will not have any adverse impact, so accordingly we now revert to our original position and fully support the proposed development.

Should you wish to clarify this position in any way, please do not hesitate to contact us.

Best regards

Lindesay & Anne Blackburne-Kane

Lindesay Blackburne-Kane
LBK Consulting

PO BOX 314
Nannup WA 6275