Our ref: 012223

Council ref: MCU24/0113

2 August 2024

Development Services

Sunshine Coast Council

Locked Bag 72 QLD 4560

**Attn: Marc Cornell, Development Services**

Via email: mail@sunshinecoast.qld.gov.au, marc.cornell@sunshinecoast.qld.gov.au

**RE: Public Submissions made to Development Application for a Development Permit - Material Change of Use of Premises to Establish Outdoor Sport and Recreation (Aeromodelling Club) - 801-845 Yandina Coolum Road, Valdora**

Dear Marc,

On behalf of the applicant, Suncoast Model Flyers Incorporated, and to assist Council with the Assessment Process, the following is a summary and clarification to matters raised during the Public Notification Part of the abovementioned development application.

**Submissions review**

The following is a broad summary of submissions received for the proposal. Around 240 submissions were received, with around 140 submissions against the proposal and 100 in support.

The applicant has reviewed all submissions and seeks to provide clarification in relation to the matters raised to assist Council with an informed decision and address concerns. The applicant provides a summary of the submissions and a response below:

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| **Matters raised**  | **Applicant response** |
| **Operational concerns raised:*** The application has not provided details of the number of aircraft or number of members of the club, and what hours it has proposed it will be operational.
* The club plans to grow and encourage larger numbers and various size aircraft
* CASA approval is required to operate or build a CASA approved runway on the subject site as 50% of the site falls within the Sunshine Coast Airport Aerodrome (no fly space).
* A model plane taking off from a CASA approved runway does not have to stay within the property’s borders and they legally can fly over neighbouring properties.
* Dwellings will be under their flight path.
* There are no approvals for infrastructure on the site.
* The model planes are able to fly 7 days a week during daylight hours, and no logs are kept.
* A local resident regularly flys via helicopter through the selected envelope as he has lost the use of his legs. This is legitimate use of airspace. Is he to be denied this right?
* Aeromodelling planes and drones will fly over private property taking visuals of yards and houses.
 | The application material includes all details of the proposal and estimated daily activities, outlining that a maximum of 5 aircraft are permitted to be airborne at any one time. The Club has membership of approximately 100 persons ranging in ages. Because the sport is heavily reliant on good weather conditions, and also that some members do not drive individually but rather carpool (e.g. young adults, friends or family members etc), the estimated number of attendees fluctuates daily and at different times around work/school etc. The membership also includes retirees who will travel at times that avoid peak traffic times (e.g. mid morning). Therefore, some flexibility is appropriate in terms of hours of operation being 7 days per week (as not every day of the week is suitable for aeromodelling activities). The proposed use is highly regulated, and for that reason the majority of the matters raised (i.e. flying over houses, livestock or 24/7) are not possible to occur. The club comes under Federal Legislation governed by the Commonwealths Civil Aviation Safety Authority (CASA). The Model Aircraft Association of Australia (MAAA) has the overarching-responsibility for the maintaining of the operational rules & regulations of this recreational sport. The Club has fully qualified Flying Instructors, Model Aircraft Inspectors and Flight Examiners - as well as Safety Officers with certifications. All roles are continually monitored by the MAAA which also provides on-going training to those roles in all clubs across Australia. For all operational club members, there are three (3) levels of qualification required, they are Bronze, Silver & Gold Wings - and are awarded accordingly.The flight paths of model aircraft will be wholly within the site (i.e. the nominated fly areas), in accordance with CASA regulations and will not traverse into the Sunshine Coast Airport flight paths, over resident’s dwellings, across the Yandina Coolum Road or over adjoining premises/rural activities. In addition, for clarification the Club has confirmed that operations will not require a specialised permit from CASA (where a model craft operator deviates from the CASA standard code). The Club has confirmed this with CASA for the site subject to this development application. The flight path does not traverse into private property and will be wholly within the nominated areas which can be conditioned. Drones therefore would not be flying over private open space nor are they permitted to take photography or videos of other properties without consent. Council is able to impose conditions in regards to operations (e.g. limitation of 5 flying at any one time). |
| **Noise impact:*** Noise generated reverberates/travels due to topography and will create nuisance to residents as proven by the use of mowers, chain saws and motor bikes.
* The existing operations of the Club in Coolum Industrial Estate has caused nuisance to residents in past.
* Noise impacts from model aircraft will be in addition to aircraft noise from Sunshine Coast Airport operations and further disrupt the local amenity
* Significant noise created by model planes would be prolonged and cause distress to a substantial population of residents, farm and rural property animals and abundant native fauna in the area
* Noise generated will not comply with the relevant codes and policies.
* Neurodiverse people are more affected by noise and need to be considered.
* The Davison shooting range is used every Sunday and weekdays and is audible in the locality.
* Noise will impact Airbnbs in the area (Short term accommodation)
 | The application is accompanied by a noise impact assessment, undertaken by a qualified professional at the clubs own cost. The noise report confirms that the operations will result in negligible impact factoring in the site’s location, surrounds and sensitive receptors.The proposal is not for aircraft such as those travelling to/from the Sunshine Coast Airport and therefore should not be compared to the flight path noise impacts. As above, it is unlikely the proposal will operate 7 days a week and cannot practically operate during all day light hours.Logs of aeromodelling activities can be maintained should Council see it appropriate for the operation of the use however it is not clear how flight logs would result in lesser or greater noise. Council can condition the proposal accordingly and to regulate/minimise noise impacts.The club has a good neighbour policy and many operational requirements, and it is understood that the club had no issues with neighbours at the previous location. An existing outdoor sporting use is operating in the locality, the applicant seeks to be supported in the same capacity as the existing equestrian school, shooting range, short term accommodation providers etc whom in some cases have a greater impact and benefit from the large land parcels and accessibility. |
| **Access and vehicle impacts:*** Where will the entre/exit points be, off Yandina-Coolum or Dyne Roads?
* The proposal will attract additional vehicles on roads.
* Yandina Coolum Rd has become one of the busiest rural roads in the past few years and has a high volume of traffic.
* Aircraft are a safety issue or potential crash risk for motorists
* Traffic will increasingly deteriorate the unsealed road & exasperate the current dust issue for homes along the road i.e. tank water that will be contaminated as a result.
 | The proposal will gain access from Dynes Road. In terms of vehicle generation, the use is comparative to a staffed farm/rural activity or other community use that would generate vehicle traffic on a daily basis and the surrounding road network has capacity to accommodate the Club’s operations. Vehicles will not be coming and going constantly given the number of aircraft in flight is capped and flight times are not ‘short’.  |
| **Risk of fire:*** The area is surrounded by cane fields and known to be very flammable which is significant fire risk by model craft crash landing.
* The proposal will heighten the risk of a bush fire as it is heavily vegetated and the homes are up hill
* There is no water source at the subject property and no mains water point located conveniently.
* The site is not ‘flat open land’, so a fire break could not be achieved without impacting the farmers crops.
* Members of our rural fire brigade have indicated there would be difficulty getting trucks into the often soggy ground there, which would make fighting a fire at this location incredibly challenging.
* A fire started by a model plane club in a rural zoned area near Ipswich burnt down a neighbouring farm killing all of its livestock with it.
* Surrounding farms such as cane would be at increased risk of fire, which would impact their viability to farm. It has been indicated that crop insurances would potentially rise.
 | The proposal is not located in a bushfire hazard area. Sugarcane can be burnt in a controlled manner for processing which has been done for many years on this site, and the design of the site and adjacent paddocks is therefore already designed to mitigate the spread of fire. Where a fire truck is required on-site for fire purposes it would not be during wet periods (as the ground would likely be too wet for fires to spread aggressively as suggested). The Club will improve the access into the site as well and ensure it is regularly maintained, likely improving the site’s overall. The risk of fire from the supervised and operationally manageable model flying activity is considered lesser risk than cigarette butts from vehicles on Yandina Coolum Road, or the open fires as part of the short-term accommodation camps at the adjacent equestrian facility. Regardless, the risk of fire is not taken lightly and the applicant can have operational measures in place in instance of fire. |
| **Aeromodelling incidents:*** These model aircraft are not governed by any maintenance or operational regulatory practices so the likelihood of an accident is very high.
* These planes do crash regularly and there are many examples of fires started by crashing model planes.
* A plane could crash onto the Yandina Coolum Road, nearby wildlife, the riding school, infrastructure (including the solar farm and telco tower), farms or residential dwellings at any moment and result in injuries or fatalities.
 | This is incorrect statements and misconception by submitters that the model craft sport does not have operational requirements and practices. AS detailed to Council in the application material, the Club have standards to comply with from CASA, MAAA and their own Organisation’s Charter for members. |
| **Flood:*** The works that have already been carried out at the site, are not to the correct flood height. A septic tank is located at ground level (which is not to code) in the next flooding event will result in sewage entering the surrounding environment
 | A Flood Assessment has been prepared by a reputable engineering firm in support of the proposal and confirms the proposal can operate safely and infrastructure will not result in unacceptable impacts which can be addressed as part of Council conditions and separate plumbing approvals (where required). It is noted that all properties in the vicinity have septic systems of varying types and would result in the same outcome as suggested by the submitter in times of a major flood.  |
| **Ecological concerns:*** An environmental impact assessment is required for the proposal
* The noise and vibration from the planes will impact birds, wildlife and habitats, including two pods of kangaroos that reside on the property, with joeys born every year. There are birds, snakes and a pair of Brolgas inhabiting the site.
* The site is within the Sunshine Coast Flood plain / Maroochy wetlands and Blue Heart region. This area has been flagged to have ‘no intensification of its use’, to maintain the Sunshine Coast’s flood storage and wetlands. To build a runway and improve access into this paddock, the Club would also need to bring in huge amounts of fill, which is again not allowed in a flood plain or the Blue Heart Area.
* Wildlife experts and vets have indicated wildlife and animals would be very scared of the planes and would likely flee.
* The proposed site is close to Mount Ninderry, which is home to flora and fauna which would be negatively impacted.
* Area for wildlife is becoming very scarce – the area is one of the last where fauna can live freely without too many risks.
* Land clearing will result from the proposal
 | The subject site is not identified as an ecologically important area and does not trigger requirement of a report. The Sunshine Coast Airport operations already occur in the vicinity (flight path) which would have more impact on local wildlife than the much lower impact model craft (which are significantly less in size and scale).The proposal is low intensity in terms of the site’s usage, which will have minimal infrastructure, noise impacts and operations. Only balance cut/fill will occur within the subject property for a level landing area and will not impact the flood plain. The proposed use is not intensive or urban in nature and aligns with the Blue Heart intent. The existing noise and operations associated with the Sunshine Coast Airport would have a greater and more significant to wildlife (and amenity) than the aeromodelling activities proposed. Since the Airport’s change in runway, there has been no known reportable issues to wildlife and therefore it is logical that the addition of the aeromodelling sport on a 10 hectare site would not create adverse impacts further to the current setting. Land clearing is not proposed by the use, nor would impacts result to Mount Ninderry or national parklands in the vicinity. All works are to be contained within the site and aeromodelling activities within the site boundaries (and airspace above). |
| **Property value:*** The proposal will impact property values
 | This is not a planning matter, but there is nothing to suggest that the presence of a small, family friendly and professionally run model flying club would affect property values.  |
| **Land use:*** The proposed use is not in keeping with the zoning.
* The proposed location provides insufficient services to operate (e.g. no sealed roads for the users or emergency services, no public water or sewage available)
* The proposal will change the zoning of the site
* The proposal will have a major impact on future sports and recreational clubs wishing to also utilize the agriculture nature of these wetlands, to groups like motor bike tracks and car clubs etc.
* An alternative site needs to be found that does not impact on the environment and its inhabitants, human, wildlife and livestock.
* The issue the club is facing was foreseen and Council adopted the Regional Facilities Plan for Difficult to Locate Sports 2019. It states that displaced clubs should relocate to Tin Can Bay. The Club states this is ‘too far’ to travel which is an unacceptable reason to displace pre existing businesses, wildlife and severely impact the surrounding community. This plan was put in place for a reason and should be implemented.
* This site is unsuitable for model planes. It is incredibly windy, often very wet and or flooded. The owners of the land, (VIMG) state on their website they intend to develop this address into more solar panels. This will mean that in the near future VIMG’s purpose for the land will not be compatible with the applicants intended use.
* The existing model aircraft field at Forrest Glen can accommodate the proposal.
 | * A well-made DA has been submitted for the proposal which is a potentially consistent use and which can be conditioned to mitigate any edge effects. Other proposals for sports activities on rural sites would be subject to separate Material Change of Use and merits-based assessment at that time. Council can therefore approve this application without creating precedent or ‘major impact to agricultural land’.
* Site constraints like acoustic and flood impacts have been satisfactorily addressed with specialist reports.
* A development application does not change the land use zoning which requires a sperate process under the Planning legislation.
* Council’s Regional Facilities Plan for Difficult to Locate Sports 2019 is not an adopted planning instrument or implementable ‘plan’ nor a strategic planning guide that has had any form of public consultation (or consultation with the applicant i.e. sporting club) – the document has only flagged the parametres and preferences for locating such activities when Council was aware that the difficult to locate uses were coming to the end of leases of State Government land and made a recommendation in 2019. Council has made no further progress from that investigation. The Club has proactively worked with Council (in particular the Sport and Recreation team) for 5+ years with no success at an alternative location in the entire Sunshine Coast region considering both private or government owned land. Land in other zones, such as Outdoor Sport and Recreation Zones are not available, hence the Rural Zone is better placed for the proposal.
* The proposal will not displace residents or business in the vicinity and with regard to alternative sites, the Phoenix Flyers at Forest Glen it is not possible to accommodate the Club members (or merge them at that site), due to operational constraints (i.e. safety and operating full capacity with their current membership). Further, the Phoenix Flyers could be required to vacate their current property at short notice.
* The applicant has demonstrated planning need for the proposal and no suitable alternative site with all impacts able to be managed and mitigated with the inclusion of reasonable and relevant conditions.
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| **Surrounding land uses:*** The proposal will impact the existing businesses and operators in the vicinity, causing financial impacts, impacts to livestock and animals, farming and the horse riding school
* The applicant should find a site in the industrial estate (similar to that which they vacated) which would be far less impacted than the area proposed, as people live in the area with pets and other animals 24/7.
* The use should be located in a less populated area
* Several farm owners have indicated they would be forced to cease farming
* ‘Yandina Station’ oppose the application due to the direct impact on wedding and corporate events business from both a noise and a privacy perspective.
* The adjoining Raven Park Equestrian Centre (RPEC) oppose the development due to potential impacts upon their business operations, including horses, horse riders, children and staff
* Particular concerns with children and beginners on horses with model craft flying throughout the day.
 | Council is expected to make a balanced determination in regards to the proximity of surrounding land uses and reasonableness of impacts to these vs perceived impacts. The Club has demonstrated that impacts are able to be mitigated (e.g. Acoustic assessment), no flights over/outside of the subject site and sufficient buffer distances. The Club has demonstrated no reasonable alternative and over the past 5 years sought Council’s assistance in locating to a zone established specifically for sport and recreation with no success. Reasonable and relevant conditions can be imposed upon an approval which would ensure rural activities, residential amenity would be maintained. Yandina Station is located 2.4km (approx.) from the subject site (again quite distanced from the fly over areas and inaudible from their location, let alone visible). |
| **Consultation:*** Residents have not been consulted about the proposal
* Public consultation should include a meeting with Council or the model flyers in relation to the proposal
 | The application has undergone public notification in accordance with the Planning Act.  |
| **Due process:*** The Model Flyers Club should not have been allowed to proceed with the application.
* This applicant has disregarded proper procedure/commenced works prior to Council approvals
 | The extent of works to store a building and erect a shade structure does not trigger assessable works against the planning scheme. The Club were required by the State Government to remove all buildings and structures from the previous site and as a lease was secured at the subject site, these were relocated for storage purposes while the development application was prepared and submitted in accordance with the Planning Act. Council responded to complaints that works had commenced and confirmed that no actionable works had in fact occurred. The applicant has improved access which is in accordance with any ‘Accepted’ works on a rural property (i.e. a farm could do so without triggering assessable works).  |
| **Support:**Positive submissions have been made in support of the proposal, including a submission of support from Council’s Sport and Recreation Team and Model Aeronautical Association of Australia (MAAA). Reasons for support for the application received from submitters included: * Aeromodelling is a valued activity in the community – Aeromodelling is enjoyed by people of all ages and many family groups participate in both club/social and flying activities.
* Aeromodelling is a Sport – MAAA is a member of Air Sports Australia Confederation (ASAC) and the International air sports body, Federation Aeronautique Internationale (FAI). ASAC is recognised by the Australian Sports Commission and MAAA members regularly compete in World Championship events including Suncoast Model Flyers club members who are Six time World Champions which has been widely publicised in the Sunshine Coast region.
* The Queensland Branch of MAAA has approx. 60 member clubs (approx. 3000 individual members) including the Suncoast Model Flyers club. The activities at the proposed site will be conducted safely and with appropriate protections that result from MAAA affiliate clubs (such as the Suncoast Model Flyers) under the MAAA’s national framework for safety and regulatory compliance and endorsed by CASA (Civil Aviation Safety Authority).
* MAAA affiliate clubs have comprehensive insurance protection.
* The sport is controlled by CASA as to where we can fly, how high we can fly. To date in the 30 years of the Club's operation there have been no fatalities, and no property has been destroyed.
* Remote Aviation is a rapidly growing industry with the increasing use of Remote Piloted Aircraft (drones) in many aspects of industry as a profession. Many of these pilots’ herald from recreational remote aviation, being introduced to the sport and trained in the basics from clubs such as is proposed. Without these clubs fostering new pilots and providing areas to learn and practice, many would either not get involved or resort to flying in non-approved areas to learn and practice.
* The field that is being proposed will be regulated by both members with CASA accredited training (AVI30419 Certificate III Aviation (Remote Pilot) and the Chief Remote Pilot + Chief Flight Instructor), CASA and Council requirements to make sure there is no conflict with surrounding neighbours and infrastructure as there are built in safe guards into radio controls and aircraft.
* The Club also has a well developed set of rules which determine flying time's and type's of licensing requirements needed to fly certain aircraft, in fact there are over 30 club rules that need to be observed at all times, which is why the club has had such a great safety record over the last 30 years.
* The hobby also attracts as very large interest from The Education Sector with Science, Technology, Engineering & Mathematics (STEM) for students-and is recognized by the Club with students wanting to enter the Aerospace Industry.
* A large majority of the members have and would utilise the Club as a social purposes contributing to mental health. For example, the Club typically has a Monday and Wednesday regular group who make up a large portion of the retiree age bracket and spend more time discussing ‘old times’ than flying. These members say that Aeromodelling is an activity that keeps them active and gets them out and about.
* Aeromodelling develops careers – Model flying has contributed to many of the Junior participants going on to successful carers in both Military and Civil aviation. The basics of aviation, aerodynamics and mechanics and the passion for flight are learned at the Club.
* The Club provides a venue for aeromodellers to meet, fly models, share knowledge, and in general a warm welcoming space for like-minded members of the local community and interstate visitors. There are social and economic benefits resulting from the proposal that should not be discounted.
* The Club is a home to a large membership of like minded people similar to a Men’s or Women’s shed, and like so, they support each other in times of need and have a camaraderie due to their shared interests. This is not only in helping one another with technical issues of aeromodelling, but mental health issues and every day life with its ups and downs as a way to connect with others.
* Many birds (Storks, Spoonbills, Falcons, Wedgetail Eagles, Wild Geese, Ducks etc) and Kangaroos inhabit the current site. They do not appear to have been affected by Club activities in past.
* There are limited options in the Sunshine Coast area for the expanse of land required to safely fly models so it is very important that this application be approved for this site so that the club can continue to provide a space for aeromodellers.
* The Club previously hosted a yearly competition and public event where members of the public and other clubs attended – drawing people to the Sunshine Coast and bringing economic benefits.
* The newly proposed field is a valuable asset to the Sunshine Coast as there is no other alternative until Maryborough or Tin Can Bay.
* A majority of negative submissions have been based on a precedent already set by the owner/operator of Ravens Park Equestrian Centre RPEC). This centre is also a sporting operator and as such the same opportunity to participate in their chosen sport should be available to the Model Flyers Club members.
* The RPEC hold camps for riders with camp fires in close proximity to the cane fields –this would be of higher risk of bushfire than the proposed Club operations.
* This subject site is rural, has minimal dwellings in proximity and achieves the minimum area for the type of activity.
* There is more noise resulting from the Yandina Coolum Road then there would be from the activities of the proposed Club.
* The Club provides a safe and controlled environment for members to learn the sport which requires technical understanding of aerodynamics and consistent practice.
* the Club also fosters social connections, encourages community building, teamwork and place to connect over shared interests.
* the Club has operated at the Coolum industrial estate since 2002 and has a current membership of approx. 100 members varying in age from 10 to 87.
* the Club has operated for over 20 years with no complaints and negligible impacts to site/surrounds.
* the requirement to find the Club a new ‘home’ is due to the Club’s lease with Economic Development Qld at Quanda Road (Coolum Industrial Estate) not being extended in January 2024 after years of no certainty of an end date for the lease arrangement. The most convenient zone/land type that caters for the use (large, flat space) are unavailable / occupied as has been demonstrated by over 5 years of discussions and investigations in consultation with Sunshine Coast Council. Land in the Rural zone provides the only known alternative that is currently available to facilitate relocation of this established community sporting group.
* A well made DA has been submitted for this local aeromodelling activity which can be conditioned accordingly. Other proposals for sports activities on rural sites would be subject to separate Material Change of Use and merits-based assessment. Council can therefore approve this application without creating precedent or ‘major impact to agricultural land’.
* Site constraints like acoustic and flood impacts have been satisfactorily addressed with specialist reports.
* The access proposed is to Dynes Road only, and in accordance with the State Assessment Referral Agency conditions.
* the Club will operate during reasonable hours of operation limited to weather conditions.
* The applicant sympathises with submitters whom have concerns that the model aircraft will frighten animals, including those at the horse facility, however this will not be the case. One submittor highlights an instance at the Army base at Oakey with the introduction of helicopters (real ones). Within a week, animals such as cows would not even bother to look up when you flew 10 feet overhead. Animals acclimatise very quickly to this (e.g. rural stations where stock are herded by combination of working dogs, horses and motorbike/helicopter). In the case of this proposal, the model craft are 10% scaled versions of the real planes and will not be overhead but rather in the distance. Council can condition that no flight occur over livestock.
* As resident of Division 9 noted a concern with an increase in youth crime and therefore the proposal assist in creating a community interest and providing a safe space for families and younger generations to gather and meet that is positive and uplifting with a very minimal impact on our environment including noise.
* One submitter has been a member of two model aircraft clubs and in both cases, the location involved flying over horse paddocks and close to road and rail lines without incident and 400 meters from a up market housing estate. Both fields had an abundance of wildlife which were not bothered by the aircraft.
* There is also a large majority of modellers now flying electric model aircraft which make little to nil noise at all.
* Submitters suggested noise will not be an issue given the noise from commercial and army plane flightpath (including helicopters) of Sunshine Coast Airport which are a lot louder than model planes.
* Submitters have enjoyed mateship and support from fellow members which has contributed to their well being and mental and physical health
* This location is the only practical site found during discussions and investigations over the last 5 years. The fact that Council themselves have not been able to provide an official new location on the Coast in the past 5 years means without the approval for this site our club would fold, and with it many members would leave the hobby and less contact with peers and friends and other negative outcomes.
* The proposed use is a ‘potentially consistent use’ in the rural zone in the planning scheme and the DA has demonstrated that any impacts can be conditioned or mitigated, and the use is therefore suitable for the site.
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We trust that Council can now proceed to make a balanced determination.

Kind regards,



Luke Farrelly

Director

Plan2Project Pty Ltd