

Kelly Dewey @planning.nsw.gov.au

To: Maddocks Lawyers Attention Rebecca Nolan GPO 1692 Sydney NSW 2001 Email: publicsubmissions@maddocks.com.au	&	To: Kelly Dewey Litigation, Legal Services Department of Planning Industry and environment GPO Box 39 Sydney NSW 2001
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Objection to DA 1176/2014 & 06_0309 Mod 3 amendments

I have previously submitted objections to this development application and these objections still stand. I have not provided any donations to any political party.

My objections include:

1. The non-fly exclusion zone is meaningless, unenforceable and unsustainable when boats and yachts are within the proposed flight path. Air Services Australia's (ASA) Aircraft noise/ Helicopter Operations – November 9/2016 clearly states Fly Neighbourly Agreements (FNA) i.e. **exclusion zones are voluntary agreements and are not legally enforceable.** Ref: <http://www.airservicesaustralia.com/aircraftnoise/aircraft-operations/helicopter-operations/>.
2. Mannering Park Sailing Club's licence responsibility

Item 1

Mannering Park Amateur Sailing Club (MPASC) hosts several sailing regattas throughout the season with fleets of up to 50 yachts. The take-off and landing flight paths proposed by Johnson Property Group's (JPG) helipad application are in direct competition to MPASC licenced sailing course.

Page 9 of JPG's Further Planning Report May 2019 states: *"If the pilot determines that the presence of watercraft outside that immediate area presents an obstacle to safe helicopter movement and the watercraft cannot be safely avoided whilst remaining confined to the designated take-off and landing area, helicopters must not undertake that movement."*

This means that the pilot will choose the alternative take-off and landing paths within the non-enforceable 'no-fly exclusion zone' ref: Civil Aviation Advisory Publication July 1992 No: 92-1. This pilot regulation states that prevailing weather conditions and obstacles should be considered. These matters are the responsibility of the pilot in command and renders the proposed no-fly zone meaningless.

Item 2

The JJ Ryan Additional downwash report Page 35 section 5.4.3, Figure 5.7 Implies that yachts /boats only sail within the "yellow triangle" area when competing in MPASC regattas. This is incorrect; sailing vessels require wind and are dependent on wind direction. On any given day yachts will regularly sail into Bardens Bay, past the marina, then tack towards the north of Summerland Point. Similarly, when sailing from the SE yachts will normally sail up to and just off the cardinal mark at Buff Point this is required so they can passage along that shoreline and into the next bay above Bird Cage Point. It's all a matter of boats zig zagging across the lake according to the wind direction.

Page 36 of the JJ Ryan Additional downwash report estimates that when a helicopter reaches the yellow triangle line there is 6 klms of downwash. There is no information on the downwash effects on the sail area for a range and variety of boats e.g. a 37 foot yacht with full sail reaches 55 ft. above the deck. Sudden wind gusts such as a down draft can fling the boom across the deck causing serious injury.

Page 36 item 5.4.4 Additional Take-off Manoeuvre Considerations states: *"In reality, helicopter pilots will seek to avoid overflying watercraft during take-off (and approach) to further minimise any potential downwash impacts."* This means that **the only other alternative flight paths are within the non-enforceable no-fly exclusion zones.**

Aquatic licences require the submission of a yearly risk assessment by sailing clubs. The operation of helicopter flight paths directly above and aligned to MPASC licenced sailing course is a safety risk particularly when the proposed helicopter operations provide no economic or social benefit to the community.

Print your name: *MAUREEN MORRIS*

Sign your name: *M. Morris*

Print your address: *19 ALFRED STREET
ROZELLE
NSW 2039*

Date: *22/8/2019*

