

22 April 2022

Keiran Thomas
Director, Regional Assessments
Department of Planning and Environment
Planning and Assessment
Locked Bag 5022
Parramatta NSW 2124

Attention: Jonathan Kerr, A/Senior Planning Officer, Regional Assessments

Dear Keiran,

**RE: MP06_0183 MOD 2 - SECTION 75W MODIFICATION APPLICATION TO MODIFY CONCEPT PLAN MP06_0183 - MIXED USE RESIDENTIAL/TOURIST DEVELOPMENT - RESPONSE TO SUBMISSIONS - REQUEST FOR INFORMATION
147 SOLDIERS POINT ROAD, SOLDIERS POINT (LOT 31 DP 529002)**

Milestone (AUST) Pty Limited (Milestone) continues to act on behalf of Salamander Properties Pty Ltd (Bannisters Hotel) in relation to the Section 75W Application to modify the Concept Plan Approval No. MP06_0183 approved by the Minister's Delegate on 4 September 2011, for a "*mixed use residential/tourist development*" for the property known as No. 147 Soldiers Point Road, Soldiers Point.

We refer to the Request For Information (RFI) issued to Milestone via email by Jonathan Kerr, Senior Planning Officer, Regional Assessments dated 11 April 2022, seeking further justification in relation to two matters with respect to the proposed revision of the Concept Approval:

1. Condition 2 – Designated visitor parking.
2. Condition 13(c) – Emergency internal perimeter road

Further, clarification has also been requested for the following matters within the Response to Submissions Report (RtS) dated 29 March 2022:

- Revision of the Gross Floor Area (GFA) breakdown of the approved and proposed concept plans held within Appendix C of the RtS Report.
- Any further modification of Condition A1 of the Concept Approval to be outlined in accordance with the MOD 2 Concept Plan.

This letter should be read in conjunction with the following supporting documentation:

- **Appendix A:** Revised Appendix C - Gross Floor Area and Apartment Unit Breakdown prepared by DJRD Architects dated March 2022 (REV01), providing an updated GFA breakdown.
- **Appendix B:** Statement from Bannisters Hotels dated 22 April 2022 outlining the operation of the restaurant.
- **Appendix C:** Traffic Response prepared by TTPA dated 22 April 2022, providing further justification for the modification of Condition 2 of Concept Approval No. MP06_0183.
- **Appendix D:** Bushfire Response prepared by BEMC dated 19 April 2022, providing further justification for the removal of Condition 13(c) from Concept Approval No. MP06_0183.

This letter has been prepared in close consultation with Bannisters Hotels, as well as the Project Traffic Consultant and Bushfire Consultant to provide the Department with an appropriate response to ensure the assessment of DA No. 21/14779 is able to proceed and be determined.

1 CONDITION 2 - DESIGNATED VISITOR CAR PARKING

Further justification has been requested to modify Condition 2 of Concept Approval No. MP06_0183 to designate 20 on-site car parking spaces, in place of 75 car parking spaces, on the ground level for visitors

using the public element of the development. We note that the public elements on the site within the Modified Concept Plan (MOD 2) pertain to the food and drink component only and no longer includes retail floor space of 260m² within the Approved Concept Plan MP06_0183. Therefore, with the proposed removal of retail floor space in MOD 2, parking requirements from off-site visitors will predominantly be generated from the restaurant component comprising of 500m² gross floor area (GFA), as well as the bar/café component, which comprises of 350m² GFA

Part B8.B of the Port Stephens DCP 2012 provides the following parking provisions for food and drink premises, as outlined in **Figure 1** below:

food and drink premises, including restaurants, cafes and take-away drink premises	<ul style="list-style-type: none"> • 1 car space per 25m² floor area within commercial premises • 15 car spaces per 100m² floor area or 1 car space per 3 seats outside of commercial premises • Minimum queuing area of 5 cars for drive-thru • 1 bike space per 200m² 	• 1 car space per 30 parking spaces
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Figure 1: Food and Drink Premises Parking Requirements

Source: Port Stephens LEP 2012

The Parking and Traffic Assessment Report dated 2010 calculated the parking requirements of the restaurant component comprising of 400m² gross floor area (GFA) based on '15 car spaces per 100m² floor area' resulting in a requirement of 60 car parking spaces. The application of this control was determined to be the most suitable based on the restaurant not having any direct proposed affiliation with the hotel component and therefore, assessed as a stand-alone component.

Bannisters Hotels took ownership of the Salamander Shores Hotel operating on the site in 2018. A partnership was also formed with Rick Stein to collaborate on the restaurant component of the site, which began operation in 2021, known as the iconic 'Rick Stein at Bannisters'. Hotel guests are given exclusive booking opportunity at the restaurant with a select number of the available seating then offered for public bookings. We note that the permanent residential component of the development, comprising 98 apartments, will also have priority to book at the restaurant over the general public. Therefore, the majority of the patrons using the service of the restaurant and any café components of the development will already be guests of the hotel or permanent residents living on the site. Further detail within the statement provided by Bannisters Port Stephens (refer to **Appendix B**) outlining the operation of the restaurant within the Bannisters Hotel, is as follows:

Bannisters market positioning is boutique; however, the onsite facilities and guest usage are comparable to a resort where guests experience varied dining options on property. This cross-usage of facilities is encouraged, and the marketing of the property often involves the packaged sale of restaurant dining and accommodation. From stays during the 2021 calendar year, 76% of people who stayed in Bannisters Port Stephens dined in Rick Stein at Bannisters and 83% of guests dined in at least one outlet.

Rick Stein at Bannisters has been operating within the Bannister Hotel located in Mollismook since 2009. This restaurant operates off the same model prioritising hotel guests for bookings over the general public. Considering this, the restaurant component of MOD 2 is no longer accurately defined as a separate component to the hotel and therefore, application of the '15 car spaces per 100m² floor area' is no longer considered the most appropriate control to calculate the required car parking for this component of the development.

The Port Stephens DCP 2012, takes the definition of a *commercial premises* from the Port Stephens LEP 2012, which is as follows:

commercial premises means any of the following—

- (a) business premises,
- (b) office premises,
- (c) retail premises.

As the predominant use on the site is tourist and visitor accommodation, the restaurant is technically not within a commercial premises as per the DCP definition. However, the restaurant cannot be considered a stand-alone restaurant either, based on the above statistics and management plan for the restaurant

component. Therefore, it is deemed more appropriate to calculate the parking requirement based on '1 space per 25m² floor area within a commercial premises' under MOD 2 as is outlined within the Traffic and Parking Assessment prepared by TTPA dated 13 November 2021, resulting in a requirement of 20 car parking spaces for the 500m² GFA restaurant use.

The multi-purpose use of the site will result in a reduced level of parking demand from the restaurant, which is a justification already supported in the Director-General's Assessment Report (pp27) dated August 2011, stating:

"The proponent's traffic engineer has argued that the shortfall is acceptable as the development will attract multiple users (i.e. visitors staying in accommodation will visit the restaurant/lounge bar) which will reduce the demand for car parking. This argument is supported by the Department and the Council's Traffic Engineer".

The Traffic and Parking Assessment Report prepared by TTPA dated March 2022 maintains 20 car parking spaces are required for the restaurant component, which MOD 2 satisfies. In addition to the car parking required for the restaurant, the bar/café component has also been considered, which has a total Gross Floor Area (GFA) of 350m², resulting in a further requirement of 14 on-site car parking spaces when assessed against the DCP control. Therefore, a total of 34 on-site car parking spaces is required for visitor parking.

Notwithstanding, it is acknowledged that 75 car parking spaces were committed by the proponent under the Concept Approval. As such, a Parking Response has been prepared by TTPA dated 21 April 2022 (refer to **Appendix C**) analysing the designation of visitor car parking on the site based on a refinement of Condition 2 for MOD 2 to provide a total of 50 car parking spaces on the ground floor level. This outcome represents 30 additional spaces than is currently proposed under MOD 2 and will satisfy the requirement for visitor car parking when considering both the restaurant and bar/café components. This increase in visitor parking is a result of allocating the 11 surplus car parking spaces on-site, as well as designating a further 19 car parking spaces from the hotel component.

The Parking Response has confirmed that the proposed provision of 50 car parking spaces will be adequate to meet the parking demand likely to be generated from off-site patrons of the restaurant and bar/café uses on the site. The designation of 19 car parking spaces from the hotel component is supported by the multi-purpose use of the site and the further justifications provided in the Parking Response at **Appendix C**.

Considering this, the further refinement to designate 50 car parking spaces, 19 car spaces being from the hotel component, for use of visitors at the restaurant and bar/café is well founded and adequate for the proposed development. Modification of The Future Environmental Assessment Requirement Condition 2(a) to reflect this refinement is outlined below in red:

"2 Traffic, parking and access

The first application for a building shall be accompanied by a Traffic and Pedestrian Management Plan providing for:

- a) A total number of ~~275~~ **310** on-site car spaces. Of these, ~~75~~ **50** spaces at ground level designated for use by ~~bar/café lounge bar, and~~ restaurant ~~and retail~~ patrons.*
- b) Minimisation of internal conflict points between Solders Point Road, the port cochere, internal driveways, pedestrians, cycle movements and the car park.*
- c) Internal access to loading and unloading areas, logical access to all relevant buildings for service and delivery vehicles; and resolution of any conflicts points with other vehicles, pedestrians and cyclists.*
- d) Allocation of spaces between the residential flat buildings and tourist uses.*
- e) Details for lawful access to the residential flat building and associated parking areas to reflect future land titling arrangements.*

Future applications must be consistent with this plan."

2 CONDITION 13(C) - EMERGENCY INTERNAL PERIMETER ROAD

Condition 13(c) states future applications must demonstrate that NSW Fire Brigade emergency vehicles can adequately access the site, buildings, and structures in the event of an emergency via an internal perimeter access road. NSW Rural Fire Service provided their comment in a submission to MOD 2 dated 20 December 2021 and recommended the entirety of Condition 13 be deleted as stated below:

The provision of a 'vehicle perimeter road', as indicated within Clause 13 of the Notice of Determination No. MP06_0183 is not required due to low risk of bush fire. Although a vehicle perimeter road is not required, pedestrian access for fire fighters and appropriate placement of water hydrants is warranted."

Although the site is no longer identified as bushfire prone land in accordance with Port Stephens LEP 2012 Bushfire Area Mapping, bushfire mitigation measures are outlined within the Bushfire Addendum Letter prepared by BEMC dated 22 February 2020, which includes the provision of vehicle access along the grass verge associated with Soldiers Point Road to the existing water hydrant.

A Bushfire Response prepared by BEMC dated 18 April 2022 (refer to **Appendix D**) provides further justification for the removal of Condition 13(c) from the Concept Approval, stating:

Perimeter fire fighting vehicle access is effectively provided along the west, north and eastern boundary, with pedestrian firefighter access along the southern boundary supported by charged water supply.

No significant advantage to fire suppression operations is provided by providing vehicle access along the south perimeter between the south-east corner and south-west corner, as fire fighting vehicle will not be parked or positioned in this location as it is unsafe and impedes, vision, hose reel movements and firefighter capacity.

Considering this, the Consent Authority can be satisfied that there is suitable justification to delete Condition 13 in its entirety including 13(c) from the Concept Approval. Bushfire mitigation measures have been outlined within the RtS Report dated 29 March 2022 that allow for adequate access for emergency services to the site, buildings, and structures in the unlikely event of a fire. Further, NSW RFS also supports the removal of this condition.

3 MODIFICATION OF CONDITION A1

The Environmental Assessment Report (EA Report) prepared by Milestone dated November 2021 seeks to modify Condition A1 as follows:

A1 Development description

Concept approval is granted to the development as described below;

(a) use of the site for residential and tourist purposes;

*(b) indicative building envelopes for ~~8~~ **6** separate buildings comprising:*

*i. Building A containing ~~serviced apartments-café, gym and storage~~ **hotel rooms, restaurant and spa, maximum 7 storeys and 1 basement level;***

*ii. Building B containing ~~serviced apartments, game, spa and back of house~~ **permanent residential apartments and back of house, maximum 8 storeys and 1 basement level;***

*iii. Building C containing ~~lounge bar, conference rooms, restaurant and retail~~ **bar, permanent residential apartment, maximum 3 storeys and 1 basement level;***

*iv. Building D/E comprising ~~hotel rooms and back of house~~ **reception, permanent residential apartments, maximum 5 storeys and 1 basement level;***

v. Building E comprising ~~reception and hotel rooms~~, maximum of 4 storeys;

*vi. Building F/G comprising ~~hotel rooms~~ **bar, conference room and hotel rooms, maximum 5 storeys;***

vii. ~~Building G comprising hotel rooms, maximum of 5 storeys;~~

*viii. Building H comprising permanent residential apartments, maximum of 5 storeys and ~~4~~ **2 basement levels;***

*ix. Total ~~275~~ **310 parking spaces of 4 5 levels**, including coach/minibus/cycling parking and service vehicle areas;*

x. Vehicular and pedestrian access; and

(c) total gross floor area (GFA) of 19,600sqm, being an overall FSR of 1.6:1; and

(d) internal roads, pedestrian and cycle pathways and parking infrastructure.

No further modification is required to Condition A1. The refinements made to the Architectural Plans dated 27 March 2022 submitted with the RtS Report capture new survey material in relation to the existing vegetation on the site. No further change has been made to the Architectural Plans that detail MOD 2 in terms of the detailed design of the proposed development, which remain as submitted under the original Application in November 2021. Therefore, the proposed changes to Condition A1 remain as originally proposed within the EA Report dated November 2021.

4 SUMMARY

We consider that the additional information submitted within this response letter has addressed the matters raised within the Department's email dated 11 April 2022. A revised version of Appendix C has been submitted providing a complete GFA breakdown comparison of the approved and modified Concept Plans and it is confirmed within this letter that no further modification is required to Condition A1 as outlined within the EA Report prepared by Milestone dated November 2021.

Condition 2 is proposed to be modified to designate a total of 50 on-site visitor car parking spaces, and this proposed parking provision is considered to be appropriate and is supported by the Traffic Consultant.

Further justification has also been provided to support the removal of Condition 13 including 13(c) on the basis that adequate bushfire mitigation measures and emergency service access is provided on the site despite it not being identified as bushfire prone land. To this end we also note that NSW RFS also recommended that condition 13 in its entirety be deleted from the Concept Approval.

The submitted further material and clarification provided in this submission enables the Department to finalise their environmental assessment and Milestone respectfully requests that this Modification Application proceed to be determined without further delay.

Please contact the undersigned if you require any clarification.

Yours sincerely

Milestone (AUST) Pty Limited

A handwritten signature in black ink, appearing to read 'Lisa Bella Esposito', written in a cursive style.

Lisa Bella Esposito

Director

Appendices

APPENDIX A. REVISED APPENDIX C - GROSS FLOOR AREA AND APARTMENT UNIT BREAKDOWN PREPARED BY DJRD ARCHITECTS

Appendix A – Gross Floor Area (GFA) & Residential Unit Breakdown
DJRD Architects – March 2022 – REV01

	APPROVED Quantity	Area (sqm)	PROPOSED Quantity	Area (sqm)
Permanent Residential	0 x 1 Bed 20 X 2 Bed 20 X 3 Bed 40 Total	5950	19 X 1 Bed 55 x 2 Bed 24 x 3 Bed 98 Total	11349
Serviced Apartment	34	4455	0	0
Hotel Rooms	84	4000	90	4261
Bar/Café		570		350
Restaurant		400		500
Pre-function		115		70
Conference		550		300
Café/Retail		260		0
Conference Bar		0		250
Gym/Spa/Recreation		430		190
General BOH/Storage		1900		1360
Non-Residential miscellaneous		970		970
Total GFA		19600		19600
FSR		1.6:1		1.6:1
Car Parking		275		310

Appendices

APPENDIX B. STATEMENT FROM BANNISTERS HOTELS

PREPARED BY BANNISTERS HOTELS

BANNISTERS

port stephens

22 April 2022

Keiran Thomas
Director, Regional Assessments
Department of Planning and Environment

Dear Keiran,

Bannisters Hotel group is uniquely placed within the hotel market for its strong food and beverage presence. Overnight visitation to a Bannisters property is driven in equal parts by luxury accommodation and the onsite dining and facilities. Bannisters market positioning is boutique; however, the onsite facilities and guest usage are comparable to a resort where guests experience varied dining options on property. This cross-usage of facilities is encouraged, and the marketing of the property often involves the packaged sale of restaurant dining and accommodation. From stays during the 2021 calendar year, 76% of people who stayed in Bannisters Port Stephens dined in Rick Stein at Bannisters and 83% of guests dined in at least one outlet onsite.

Our demonstrated experience of managing both Bannisters Mollymook (since 2009) and Bannisters Port Stephens (since 2018) consistently validates the high and frequent use of Rick Stein at Bannisters by hotel guests. With the inclusion of 98 permanent residential apartments proposed within the modified Concept Approval for the upgraded Bannisters Port Stephens development, we expect that the residents located on the Bannisters property will also make recurrent use of Rick Stein at Bannisters as well as the other on-site facilities proposed to be delivered.

Yours sincerely,



Peter Bacon
General Manager
Bannisters Port Stephens

Appendices

APPENDIX C. TRAFFIC RESPONSE

PREPARED BY TRAFFIC AND TRANSPORT PLANNING ASSOCIATES (TTPA)

22 April 2022
Ref: 21322 Rev C

Mr Luke Signoretti
Senior Planner
Milestone (Aust) Pty Limited

E: luke@milestonemanagement.com.au

Dear Luke,

Re: Bannisters, Port Stephens

I have considered the Department of Planning and Environment (DPE) request to provide further justification for the proposed designation of visitor parking in relation to the proposed redevelopment of the Salamander Shores Hotel.

My understanding of the sequence of the various assessments is as follows:

- ❖ The TTPA Traffic & Parking Assessment dated June 2010 assessed the parking requirement of the restaurant component based on DCP control '*15 car spaces per 100m² floor area*' on the basis it was assessed a separate component to the hotel, resulting in a requirement of 60 spaces.
- ❖ The Director General's Report of August 2011 (P27) reports that: "*the proponent has committed to dedicating 75 spaces on the ground floor level of the parking area to these uses*" (bar, café and retail).
- ❖ Condition 2 of the Concept Approval made the following interpretation: "*A total number of 275 on-site parking spaces of these 75 car spaces at ground level designated for use by lounge bar, restaurant and retail patrons.*"
- ❖ The TTPA letter dated 13 November 2021 provided an assessment for the modified development scheme under MP06_0183 MOD 2. At this time, an exclusive partnership had been formed between the hotel and restaurant components on the site and therefore, the restaurant use was not assessed as a separate component. DCP control '*1 space per 25m² floor area within a commercial premises*' was applied, resulting in a requirement of 20 spaces.

- ❖ The TTPA letter dated 13 November 2021 included the incorrect criteria for the calculation of required car parking for 2 bedroom apartments as follows:
 - 1.2 spaces per apartment rather than the DCP criteria of 1.0 per apartment .

This resulted in a total required parking provision for the modified development scheme of 310 spaces.

- ❖ The TTPA report dated March 2022 reassessed the required total parking provision of the modified development scheme to be 299 spaces (as a result of the correction of the rate for 2 bed apartments) while 310 car spaces were still proposed (i.e. excess of 11 spaces).

Therefore, the available proposed parking on the site that can be designated for the public elements would be:

(Restaurant)	20 spaces
(Excess)	11 spaces
Total:	31 spaces

In addition to the restaurant, the bar/café component of MOD 2 comprising of 350m² GFA is also considered and assessed against the DCP control '*1 space per 25m² floor area within a commercial premises*', resulting in a requirement on 14 car spaces. Therefore, the total provision of car parking that is required be designated for the public elements as per the DCP controls would be:

(Restaurant)	20 spaces
(bar/café)	14 spaces
Total:	34 spaces

There is opportunity to designate further parking for use of visitors, from the hotel component of the development to provide the additional required to meet the demands of both the restaurant and bar/café components. The DCP requirement for the provision of 1 space per hotel room is unnecessarily onerous based on the operations of the development as:

- The hotel would only have 100% occupancy on very few occasions per year, therefore not requiring all hotel designated parking at all times.
- A proportion of guests occupying rooms will travel together [e.g. families, couples(e.g. 2 x 2)] and mini bus tours.
- There will be a hotel shuttle bus service provided to supplement the taxi, share car and public bus services available.
- There will be a very high "dual visitation/use" between the hotel rooms, restaurant and bar/café particularly as hotel guests will have priority reservation

at the restaurant which will be the principal purpose of the “stay” for many guests. Further to this, residents on the site (98 apartments) will also utilise the restaurant and not require car parking.

- Valet parking will enable “stack” parking at peak times which is a common arrangement in hotel facilities of this nature.

Considering the above, it would be appropriate to designate 19 car spaces from the hotel, which will result in a total of 50 visitor car spaces on-site being proposed in MOD 2. This will be more than adequate in meeting the expected demand for visitors using the public elements of MOD 2 and represents an excess provision of 16 car spaces when assessed under Council’s DCP controls.

The reduced provision of car parking within the hotel component is also adequate in meeting the demand of guests considering the above items.

It is my assessment that the proposed parking arrangements outlined above will be adequate and appropriate. Sufficient justification has been provided to support the proposed parking allocation on the site as per the request of the DPE.

Yours faithfully,



Ross Nettle
Director
Transport and Traffic Planning Associates

Appendices

APPENDIX D. BUSHFIRE RESPONSE PREPARED BY BEMC



Bushfire
Environmental
Management
Consultancy



BUSH FIRE RESPONSE TO DPIE REQUEST FOR FURTHER INFORMATION

147 Soldiers Point Road, Soldiers Point, NSW



Our Ref: 2021654a

Date: 19th April 2020

Luke Signoretti
luke@milestonemanagement.com.au
Milestone Town Planning

Dear Mr Signoretti,

This letter is generated in response to NSW DPE request to illustrate justification on why condition 13(c) of the Notice of Determination No. MP06_0183 should be modified.

BACKGROUND

A bush fire assessment was completed by BEMC P/L dated 17th November 2021 to determine if the proposed modifications to the Part 3A Concept Application No. MP06_0183 at 147 Soldiers Point Road, Soldiers Point, NSW (Figure 1) are consistent with contemporary bush fire planning and protection measures.

The above-mentioned assessment identified the site is no longer identified as bush fire prone in accordance with s10.3 EP&A bush fire prone area mapping. Under current bushfire planning provision, no bushfire construction or planning requirements would be warranted. The above-mentioned assessment recommended the key bush fire risk considerations of APZ separations within Table 2 (page 11) of the Ecological Australia Bush fire Assessment Report (2010) remain relevant and are still acceptable. The provision of a 'vehicle perimeter road', as indicated within Clause 13 of the Notice of Determination No. MP06_0183 is not required due to low risk of bush fire. Although a vehicle perimeter road is not required, pedestrian access for fire fighters and appropriate placement of water hydrants is warranted.

The above-mentioned assessment was referred to NSW RFS by the Department of Planning. NSW RFS agreed with the assessment and recommended that the entirety of Condition 13 of the Notice of Determination No. MP06_0183 be deleted and '*the entire site be maintained as an inner protection area and landscaping within the site will comply with Appendix 4 of 'Planning for Bush Fire Protection 2019'*' was added to condition 12.

Notwithstanding the agreed positions between NSW RFS and the consultant, NSW DPE have request further information in consideration of the Response to Submissions Report lodged for the redevelopment. NSW DPIE have requested:

- *Additional justification is required for the proposed removal of the following items from the Conditions of Consent:*
 - *Condition 13(c) – access to the site via external perimeter.*

There is not clear justification provided in the assessment documentation provided to date for why these items should be modified.

RECOMMENDATION

Condition 13(c) of the Notice of Determination No. MP06_0183 should be deleted with the following justification provided:

- The term 'vehicle' or 'fire vehicle, or 'firefighting vehicle' utilised within the BEMC P/L report dated 17th November 2021 includes 'NSW fire brigade emergency vehicles.'
- EP&A Act and PBP 2019 are based on landscape fire scenarios, which the vegetation around this site does not support.
- The subject site is not bushfire affected in consideration of the EP&A Act and PBP 2019, and technically no specific bushfire planning, or construction requirements are warranted.
- Notwithstanding the above, bushfire mitigation measures have been provided to mitigate for small, localised fires within the reserve to the south. This includes:
 - Providing vehicle access along the grass verges from the north, along the eastern and western boundaries of the proposed development.
 - Charged reticulated water is provided at both south-east corner and south-west corner locations that are fire fighting vehicle accessible.
 - The reticulated water is in safe locations and are quickly accessible.
 - Perimeter fire fighting vehicles access is effectively provided along the west, north and eastern boundary, with pedestrian firefighter access along the southern boundary supported by charged water supply.
 - No significant advantage to fire suppression operations is provided by providing vehicle access along the south perimeter between the south-east corner and south-west corner, as fire fighting vehicle will not be parked or positioned in this location as it is unsafe and impedes, vision, hose reel movements and firefighter capacity.
 - The recommendations provided in BEMC P/L report dated 17th November 2021 considered the operational capacity and the safe and effective placement of vehicles during fire suppression operations. Vehicles will be in the south-east corner and south-west corner with pedestrian fire fighter access for approximately 70m (35m from each corner) along the southern boundary.
 - Firefighting appliances have a lay flat hose capacity more than 70m when the water supply is located at a higher elevation than the bushfire threat (downslope), which is reflected in this situation.
 - The provision of a perimeter road along the southern boundary provides no operational benefit to wildfire suppression and is not warranted to mitigate bushfire risk.

Regards,

Duncan Scott-Lawson



BPAD Accreditation #: 47789

