

ORDINARY COUNCIL MEETING
WEDNESDAY, 24 FEBRUARY 2021

ATTACHMENT BOOKLET 2 – DA 2020.069 – HOLLEYS ROAD

Attachment No. 5	Prescribed Conditions
Attachment No. 6	Statement of Environmental Effects
Attachment No. 7	Submissions
Attachment No. 8	Local Rainfall Information

PRESCRIBED CONDITIONS

1. The proposed development being carried out strictly in accordance with the details set out in the application form and any other information submitted with the application.

Consent is given for a primitive camping ground with a maximum capacity of twelve (12) persons over four (4) sites at any one time and staged as follows;

Stage 1: Construction of Deck 1 and 2 – Bubbletent (6 persons max.)

Stage 2: Construction of Deck 3 and 4 – Bubbletent (6 persons max.)

Note: Any proposal to modify the terms or conditions of this consent, whilst still maintaining substantially the same development to that approved, will require the submission of a formal application under Section 96 of the Environmental Planning and Assessment Act 1979 for Council's consideration. If amendments to the design result in the development not remaining substantially the same as that approved by this consent, a new Development Application will have to be submitted to Council.

Reason: To confirm and clarify the terms of Council's approval.

2. All building work must be carried out in accordance with the requirements of the Building Code of Australia.

Reason: To comply with the provisions of Clause 98 of the Environmental Planning & Assessment Regulation 2000.

3. Prior to commencing any construction works on the wooden decks, of each stage;
 - A Construction Certificate is to be obtained.
 - A Principal Certifying Authority is to be appointed and Council is to be notified of the appointment.
 - Council is to be notified at least two (2) days in advance of the intention to commence building works.

Reason: To comply with the Building Code of Australia.

4. Prior to commencement of operation, the registered proprietor is to obtain from Council an Approval to Operate a (Primitive) Camping Ground under the provisions of Section 68 of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005.

Application to Operate a (Primitive) Camping Ground is to be lodged with Council accompanied by the schedule fee based on the number of camp sites.

Reason: To ensure the facility is operating in accordance with the relevant provision of the Regulation. Approvals are valid for a period of 5 years.

GENERAL CONDITIONS

5. The development must be undertaken strictly in accordance with the details set out on the application form, any information submitted with the application and the plans submitted, as amended in red by Council, or as modified by the conditions of this Notice of Determination.
 - Plans provided by Efficient Building Design Services (EBDS) dated 08/07/2020, described as Proposed Campground, 57 Holleys Road, Tenterfield NSW 2372, B Middleton & C van der Walt. Consisting of the following:
 - 3 001 – Site Plan 3 801 – A - OSSM Design
 - 3 801 – B – OSSM Site 1 3 801 – C – OSSM Site 2
 - 3 801 – D – OSSM Site 3 3 801 – E – OSSM Site 4
 - 1 100 – Floor Plan 3 000 – A – 3D Render 1
 - 3 000 – B – 3D Render 2
 - Mirumiru Bubbletent Pty Ltd Bushfire Report, dated July 2020
 - Statement of Environmental Effects, dated 14 July 2020
 - Bushfire Emergency Management and Evacuation Plan, dated 2 July 2020.

Note: Any proposal to modify the terms or conditions of this consent, whilst still maintaining substantially the same development to that approved, will require the submission of a formal application under Section 4.55 of the Environmental Planning and Assessment Act 1979 for Council’s consideration. If amendments to the design result in the development not remaining substantially the same as that approved by this consent, a new Development Application will have to be submitted to Council.

Reason: To confirm and clarify the terms of Council’s approval.

6. Any earthworks associated with the construction of the building must comply with part 3.1 and 3.2 of the BCA if they are to be maintained by means of an unprotected embankment. Alternatively a retaining wall is required to be installed to the earthworks, if you opt to use this method details of the retaining walls construction are to be provided to Council prior to its installation.

Reason: To comply with the Environmental Planning and Assessment Act and the Building Code of Australia.

PRIOR TO COMMENCEMENT OF CONSTRUCTION

7. Toilet facilities are to be provided, at or in the vicinity of the work site.

Reason: To comply with the Environmental Planning and Assessment Act.

8. Prior to the installation of each On-Site Sewage Management System servicing each camp site, Council will require the manufacturer's specifications along with a proposed On-Site Sewage Management/Drainage Plan including all dimensions and distances from boundaries, dwellings and water courses. The plan must also include the North point and the fall of the land. The proposed on-site sewage management system is to be approved by Council prior to any external drainage works commencing.

Reason: To enable Council to finalise the On-Site Sewage Management Application.

9. Prior to commencing any construction works for Stage 1 and Stage 2:
- i. A Construction Certificate is to be obtained for each individual stage;
 - ii. Council is to be notified at least two (2) days in advance of the intention to commence building works.

Reason: To comply with the Environmental Planning and Assessment Act.

10. To prevent soil leaving the site and entering the stormwater system and causing pollution of rivers and creeks erosion and sediment controls are to be installed prior to work commencing and include the following:

The installation of a sediment fence with returned ends across the low side of the site so that all water flows through. Drains, gutters, roadways etc shall be kept clean and free of sediment. To prevent the movement of soil off site, a single entry/exit point to the property shall be constructed of 40mm blue metal aggregate or recycled concrete to a depth of 150 mm. The length must be a minimum of 5 m and a width of 3 these measures shall be maintained throughout the course of construction and until all disturbed areas are restored by turfing, paving or revegetation.

Reason: To comply with the requirements of the Protection of the Environmental Operations Act 1997 and protect the amenity of the local environment.

DURING CONSTRUCTION

11. The Construction site shall be suitably protected from the entry of unauthorised persons at all times prior to the completion of the works.

Reason: To protect the health and safety of the community.

12. Construction, demolition and associated work shall be carried out only between the times stated as follows:-

Mondays to Fridays 7.00am to 6.00pm

Saturdays 8.00am to 1.00pm

No construction work to take place On Sundays & Public Holidays

Reason: To ensure that the environmental quality of adjoining land is not adversely affected, such as by the generation of excessive noise levels.

13. All building materials, plant and equipment is to be placed on the building site. Building materials, plant and equipment (including water closets), are not to be placed on footpaths, roadways, public reserves etc.

Reason: To ensure pedestrian and vehicular access is not restricted in public places.

PRIOR TO OCCUPATION

14. A complete 'Notice of Work', 'Certificate of Compliance' and 'Works as Executed Sewer Services Diagram', including all measurements and distances from the boundaries, dwelling and inspection openings, and must include all on-site detention facilities, surface and roof water drainage, this is to be submitted in detail to Council by a licensed plumber at the time of the external drainage/stormwater inspection.

Reason: To ensure the internal and external drainage and the stormwater systems as constructed, are recorded accurately.

15. Damage caused to Council infrastructure as a result of the building activities shall be rectified by the applicant at their full expense. The adjustment of any existing utility services or installation of new services is to be at the full cost of the developer.

Reason: To ensure infrastructure is not damaged as a result of the development and because the nature of the proposed development may have an impact on the operation of utility services.

16. Occupation or use of premises for the purposes approved by this consent shall not commence until all conditions of this consent have been complied with and the Occupation Certificate has been issued.

Reason: To ensure compliance with the provisions of the Environmental Planning and Assessment Act, 1979, and Council's terms of consent.

New South Wales Rural Fire Service (NSW RFS) Integrated Condition/s
S100B of the Rural Fires Act 1997

General Conditions

20. The development proposal is to comply with the layout identified on the drawing titled 'Site Plan' prepared by Efficient Building Design Services (Ref: Project No. 20-041, Rev. 3), dated 7 January 2020 (*sic 2021*), except as modified by the following conditions.

Asset Protection Zones

The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting fire fighting activities. To achieve this, the following conditions shall apply:

21. From commencement of the development, and in perpetuity to ensure ongoing protection from the impact of bush fire, the entire property must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of Planning for Bushfire Protection 2019. When establishing and maintaining an IPA the following requirements apply:
- Tree canopy cover should be less than 15% maturity;
 - Trees at maturity should not touch or overhang the building;
 - Lower limbs should be removed up to a height of 2 metres above the ground;
 - Tree canopies should be separated by 2 to 5 metres;
 - Preference should be given to smooth barked and evergreen trees;

- Large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings;
- Shrubs should not be located under trees;
- Shrubs should not form more than 10% ground cover;
- Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation;
- Grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
- Leaves and vegetation debris should be removed.

22. From the commencement of the development, and in perpetuity to ensure ongoing protection from the impact of bush fire, the land around the existing dwelling (emergency assembly building) for the following distances must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of Planning for Bush Fire Protection 2019.
- North for 38 metres;
 - East and West for 36 metres; and
 - South for 40 metres.

When establishing and maintaining an IPA the following requirements apply:

- Tree canopy cover should be less than 15% at maturity;
- Trees at maturity should not touch or overhang the building;
- Lower limbs should be removed up to a height of 2 metres above the ground;
- Tree canopies should be separated by 2 to 5 metres;
- Preference should be given to smooth barked and evergreen trees;
- Large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings;
- Shrubs should not be located under trees;
- Shrubs should not form more than 10% ground cover;
- Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation;
- Grass should be kept mown (as a guide should be kept to no more than 100mm in height); and
- Leaves and vegetation debris should be removed.

Construction Standards

The intent of measures is that buildings are designed and constructed to withstand the potential impacts of bush fire attack. To achieve this, the following conditions shall apply:

23. Prior to commencement of the development, an Occupation Certificate must be issued for the dwelling (emergency assembly point) on the property in accordance with the requirements of DA 2017.099. Where the conditions of this approval exceed the requirements of DA 2017.099, the conditions of this approval must also be satisfied.

Access – Internal Roads

The intent of measures is to provide safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area. To achieve this, the following conditions shall apply:

24. The internal access road must include a full loop, extending from Campsite 2 back to the access road to Campsite 1 and/or Campsite 4.

25. The internal access road (including loop road to the camp sites) must comply with the following requirements of Planning for Bush Fire Protection 2019:
 - Roads are two-wheel drive, all weather roads;
 - Traffic management devices are constructed to not prohibit access by emergency services vehicles;
 - Maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads;
 - The capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes);
 - Bridges/causeways are to clearly indicate load rating;
 - There is suitable access for a Category 1 fire appliance to within 4 metres of the static water supply;
 - Minimum 4 metre carriageway width;
 - A minimum vertical clearance of 4 metres to any overhanging obstructions, including tree branches;
 - The junction of the internal loop road has sufficient dimensions to permit turning in accordance with Appendix 3;
 - Curves have a minimum inner radius of 6 metres and are minimal in number to allow for rapid access and egress;
 - The minimum distance between inner and outer curves is 6 metres; and
 - The crossfall is not more than 10 degrees;

Note: Some short constrictions in the access may be accepted where they are not less than 3.5 metres wide, extend for no more than 30 metres and where the obstruction cannot be reasonably avoided or removed.

Water and Utility Services

The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residence and others assisting fire fighting activities. To achieve this, the following conditions shall apply:

26. The provision of water, electricity and gas must comply the following requirements of Planning for Bush Fire Protection 2019:
 - A minimum 20,000 litre static water supply must be provided on site;

- A connection for firefighting purposes is located within the IPA or non-hazard side and away from the structure;
- A 65mm Storz outlet with a ball valve is fitted to the outlet;
- Ball valve and pipes are adequate for water flow and are metal;
- Supply pipes from tank to ball valve have the same bore size to ensure flow volume;
- Underground tanks have an access hole of 200mm to allow tankers to refill direct from the tank;
- A hardened ground surface for truck access is supplied within 4 metres;
- Above-ground tanks are manufactured from concrete or metal;
- Raised tanks have their stands constructed from non-combustible material or bush fire-resisting timber (see Appendix F of AS 3959);
- Unobstructed access can be provided at all times;
- Underground tanks are clearly marked;
- Tanks on the hazard side of a building are provided with adequate shielding for the protection of firefighters;
- All exposed water pipes external to the building are metal, including any fittings;
- Where pumps are provided, they are a minimum 5hp or 3kW petrol or diesel-powered pump, and are shielded against bush fire attack;
- Any hose and reel for firefighting connected to the pump shall be 19mm internal diameter;
- Fire hose reels are constructed in accordance with AS/NZS 1221:1997 and are in accordance with the relevant clauses of AS 2441:2005;
- Where practicable, electrical transmission lines are underground;
- Where overhead, electrical transmission lines are installed with:
 - Short pole spacing (30 metres), unless crossing gullies, gorges or riparian areas; and
 - No part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.
- Any reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities;
- All fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side;
- Connections to and from gas cylinders are metal;
- Polymer-sheathed flexible gas supply lines are not used; and
- Above-ground gas service pipes are metal, including and up to any outlets.

Emergency and Evacuation Planning Assessment

The intent of measures is to provide suitable emergency and evacuation (and relocation) arrangements for occupants of special fire protection purpose developments. To achieve this, the following conditions shall apply:

27. A Bush Fire Emergency Management and Evacuation Plan must be prepared and be consistent with the NSW RFS documents: A Guide to Developing a Bush Fire Management and Evacuation Plan. The plan must include, but not limited to, the following:
 - That the camp sites are not to be occupied on days with 'extreme' or 'catastrophic' fire danger rating;

- A mechanism for the relocation of occupants on days with an 'extreme' or 'catastrophic' fire danger rating or days declared as a total fire ban;
- Contact details for the local Rural Fire Service office;
- Procedures for co-ordinated evacuation of the site in consultation with local emergency services.

A copy of the Bush Fire Emergency Management and Evacuation Plan should be provided to the Local Emergency Management Committee for its information prior to occupation of the development.

28. An on-site manager must be present at all times when the camp sites are occupied.

29. Camp fires are not permitted during the Bush Fire Danger Period.



Statement of Environmental Effects

Accompany a development application for

MIRUMIRU BUBBLETENT PTY LTD

At

6/1146294

57 Holleys Road

Tenterfield NSW 2372

14 July 2020

Statement of Environmental Effects
57 Holleys Road, Tenterfield, NSW, 2372

1 INTRODUCTION

This statement of environment effects has been prepared by Cathryn van der Walt to accompany a Development Application (DA) to Tenterfield Shire Council (the Council). The application seeks consent for the construction of four decks for a primitive campground for Mirumiru Bublelent Pty Ltd at DP 6/1146294 also known as 57 Holleys Road, Tenterfield, NSW, 2372.

The proposed development is illustrated on the site plan prepared by Efficient Building Design Services, dated 8 July 2020.

This report should be read in conjunction with the following documents:

This statement has been prepared having regard to the following documentation:

- Bushfire Hazard & Assessment Report – prepared by Cathryn van der Walt, Director
- Bushfire Emergency Management and Evacuation Plan – prepared by Cathryn van der Walt, Director
- Site Report – prepared by Efficient Building Design Services
- Application to Operate a Caravan, Camping Ground or Mobile Home Estate – prepared by Cathryn van der Walt

2 SITE DESCRIPTION AND ANALYSIS

2.1 Location and Property Description

The site (see Figure 1) is known as 57 Holleys Road, Tenterfield and is described as Lot 6 DP 1146294 (area 5.838ha).



Figure 1

3 DETAILS OF PROPOSAL

3.1 Proposed Works

Hours of Operation:

24/7, 7 days a week. Check in 3PM, Check Out: 10am. Minimum 2 night stay required except for public holidays where a 3 day minimum stay will be required.

Structures:

- Four Bubbletents – Bubblesuite (also referred to as a Bubbletent) & 1 x Tiny Bubble. Note currently two Bubblesuite tents and one Tiny Bubble tent are ready for installation. The delivery of further tents will be influenced by French manufacturing timelines and international delivery requirements. Therefore, they could be another 4 – 6 months away.
- The dimensions of the Bubblesuite are 6.6m x 5.6m as per the following floorplan. See Figure 2.

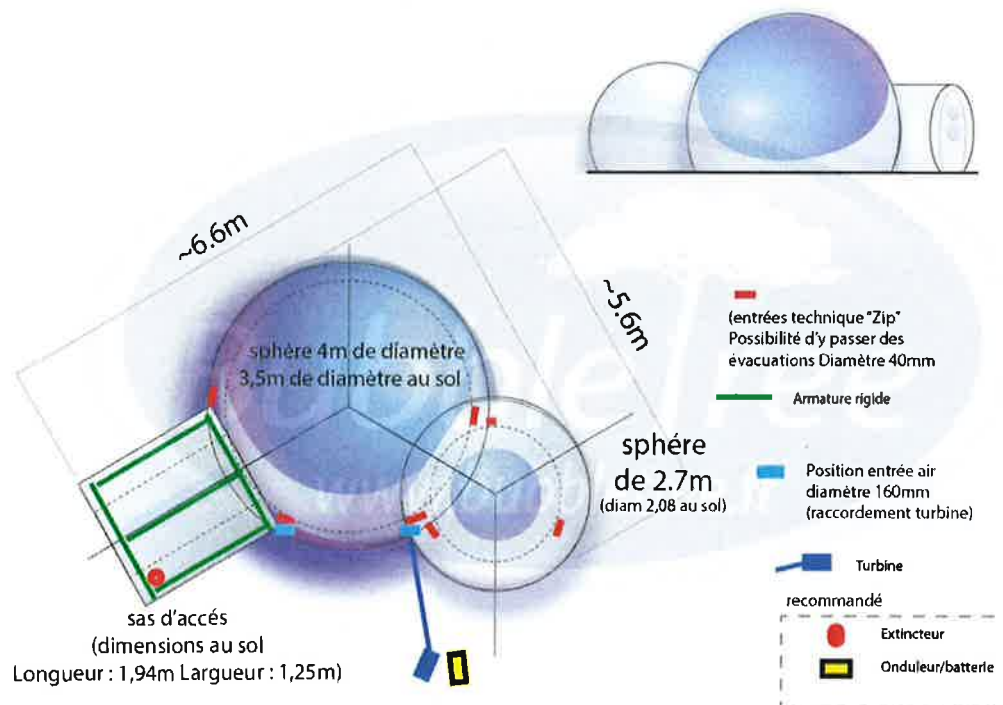


Figure 2

- The Bubblesuite is a specially designed off-grid inflatable glamping tent suitable for night-time star gazing.
- Each Bubbletent is equipped with a low power consumption and soundproof turbine (solar charged) to ensure it remains inflated at all times. Air is re-circulated 5 - 7 times per minute.
- Each Bubblesuite will be fixed to a hardwood deck (steel frame) with its own anchorage system. The entry way/access tunnel consists of an aluminium frame to ensure easy, safe, and fast entrance/exit.

Statement of Environmental Effects
57 Holleys Road, Tenterfield, NSW, 2372

- The main bubble living space also has an adjoining bathroom bubble room – which will be equipped with a waterless toilet. Hand sanitiser hand washing facilities will be provided.
- Each Bubblesuite has a thermal heat shield which covers the clear flame-retardant PVC bubble during the day to reduce heat inside the tent. Each Bubblesuite sleeps 2 people. See Figure 3.



Figure 3

- The Tiny Bubble tent can be installed on stilts or via its suspension system (See Figure 4 and 4a). It will be located as a partner tent to the Bubblesuite for family stays and occupants (it can sleep 2 children or 2 adults) will share the Bubblesuite toilet facilities.



Figure 4 and 4a

Water

Statement of Environmental Effects
57 Holleys Road, Tenterfield, NSW, 2372

- It is our aim to provide 250 litres per tent per stay to maintain low water consumption goals. This will be piped to each tent and stored for use.
- Wastewater for sites 1 and 2 will be piped to an existing approved septic tank at the top of the block for correct disposal.

Privacy

- Each Bubblesuite will be assessed for any necessary privacy screens and these will be erected if required to ensure additional privacy for guests and neighbours.
- Privacy screens will be in operation for any outdoor bathing activities that are implemented on site. Wastewater will be connected to the existing septic system.
- Each Bubblesuite has a clear/opaque main room with the bathroom bubble room predominantly opaque for privacy reasons.
- The Tiny Bubble has an internal inflatable mattress and retractable curtain on an aluminium frame for privacy and shade. It is fitted with a mosquito net.
- The four separate sites will be positioned so that the 'living area' of the Bubbletent will not directly face neighbours and other tents.

Noise:

- House rules will ensure noise levels are kept to a minimum at all times. Guests are not allowed to ride motorbikes on the property.

Environmental Impacts:

- We have recently completed bush fire hazard reduction activities including slashing the entire block, reducing fuel loads around trees and granite outcrops and will undertake a bushfire hazard reduction burn for excess wood in the coming weeks. The block will continue to be slashed on an annual basis as required.
- The addition of an access road to the block will further create a potential fire break around the boundary of the property. There is no negative impact to native flora or fauna as this formerly grazing land with little vegetation beyond love grass growing. During dry periods, any dust disturbed on the internal access road will not impact neighbours or watercourses.

Traffic & Suitability:

- The site is very suitable for a Bubbletent glamping operation due to its location and accessibility. It is only 5km from Tenterfield Village and a major highway, with easy access from Holleys Road and has can incorporate an internal access road on the property without any disturbance to neighbours.
- Guests will be instructed to stay in their designated camp site areas. Guests will be asked to adhere to strict 5km speed limits on the property with signage clearly marking where they can drive and are allowed to park.
- No driving on the property outside of designated access roads will be allowed.

Disabled Access:

Statement of Environmental Effects
57 Holleys Road, Tenterfield, NSW, 2372

An accessible toilet will be provided in a shed at the top of the property.

Waste Management:

In line with its eco-credentials, guests will be encouraged to compost food matter in specially designated disposal bins and separate any recycling materials from general rubbish. There will be a primary composting area on the property, disposal area for recyclables and general waste.

Economic and Social Impacts:

- Mirumiru Bubbletent will be Australia's second Bubbletent campground. Bubbletent campgrounds are extremely popular (running at 100% occupancy six months in advance minimum) and are in great demand.
- It is expected to generate up to two thousand additional tourists to Tenterfield annually when in full operation.
- Mirumiru Bubbletent will be marketed and promoted to national and international media (when suitable) to further support the overall tourism profile for Tenterfield.
- It is expected to create employment opportunities for on-site and external support services from cleaning, gardening, photography, floristry, food provision and catering as well as guided tours.

Site Plan:

Supplied.

Bushfire Plan:

Supplied.



BUSH FIRE EMERGENCY MANAGEMENT AND EVACUATION PLAN

Name of facility:

Mirumiru Bubblent Pty Ltd

Address

57 Holleys Road Tenterfield NSW 2372

Prepared by:

Cathryn van der Walt, Director

Authorised by:

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Date: 2 July 2020

TO BE REVIEWED ANNUALLY

Facility Details

This plan is for: Mirumiru Bubbletent Pty Ltd

and has been designed to assist management to protect life and property in the event of a bush fire.

This Plan outlines procedures for both **sheltering** (remaining on-site) and **evacuation** to enhance the protection of occupants from the threat of a bush fire. The Primary Action to follow under normal bush fire conditions is to:

Shelter

Evacuate

Contact person: Cathryn van der Walt

Position / role: Director

Phone number (BH): 0402 327 633 Phone number (AH): 0402 327 633

Type of facility: Primitive Camping Ground Number of buildings: 4 x Bubbletents

Number of employees: 1 Number of occupants: Maximum 12

Number of occupants with support needs: 0

Provide description of support needs:

Roles & Responsibilities

The following outlines who has the responsibility of implementing the emergency procedures in the event of a bush fire.

Position	Name or person	Building / area of responsibility	Mobile phone number
Director	Cathryn van der Walt	Guest Services Communications/Fire Warden	0402 327 633
Company Secretary	Brad Middleton	Guest Services Communications/Fire Warden	0409 367 801
Onsite Fire Warden	Nominated Guest from each tent during each stay	Fire Warden	

Emergency Contacts

Name of organisation	Office / contact	Phone Number
NSW Rural Fire Service	Local Fire Control Centre	(02) 6736 4150
NSW Rural Fire Service	Bush Fire Information Line	1800 679 737 1800 NSW RFS
NSW Rural Fire Service	Website	www.rfs.nsw.gov.au
NSW Police Force	Tenterfield Office	02 6736 1144

SHELTERING PROCEDURES

Evaluation of the safety of employees and occupants has determined that it would be safer for ALL persons to shelter in a designated refuge.

The following are the designated refuges allocated within the premises.

Designated refuges

- a. Shed at the top of the property
- b. Farmhouse at the top of the property

Procedure for sheltering during a bush fire emergency

Trigger	Action
<p>Bush Fire Advice/Declaration of a Total Fire Ban</p>	<p>An incident has started. Inform occupants of the fire station. Ensure all guests have access to a mobile phone and are contactable. Evacuate older and medically unfit guests to designated refuge/alternate accommodation. People in the area should keep up to date with developments via the RFS app and telephone with property manager. The role of Fire Warden for each tent is reiterated to all guests by the Guest Services Manager.</p>
<p>Watch and Act</p>	<p>Smoke or fire has been identified in the area. Inform occupants of the fire station. Ensure all guests have access to a mobile phone and are contactable. Guests are contacted by Property Management and ordered to evacuate and meet at the designated assembly area in Tenterfield village or Tenterfield Showgrounds if safe to do so. Onsite Fire Warden takes control of situation and ensures all guests leave the property.</p>
<p>Emergency</p>	<p>Fire has been identified in the area. Ensure all guests have access to a mobile phone and are contactable. Guests are contacted by Property Management and or Police/RFS and are ordered to evacuate. They are directed to meet at the designated assembly area in Tenterfield village or Tenterfield Showgrounds if safe to do so. Onsite Fire Warden takes control of situation and ensures all guests leave the property.</p>
<p>Shelter in Place</p>	<p>Whenever a direction to shelter in place is given from an emergency service authority guests who are unable to evacuate will shelter in place either in the farmhouse or shed at the top of the property. Ensure all guests have access to a mobile phone and are contactable.</p> <p>A designated Fire Warden will take control of the situation. They will remain calm and explain the shelter in place instructions.</p> <p>The Fire Warden will ensure everyone is accounted for and will advise the local emergency service (02) 6736 4150 that Mirumiru Bubbletent is sheltering in place and detail how many</p>



	<p>people are there and where they are on site.</p> <p>They will be asked to prepare for potential fire. This will include storing water in baths, sinks and buckets; preparing the outside of the house/shed for fire – watering the roof, storing water in gutters and downpipes, removing any outdoor furniture; sheltering in a room on the opposite side of the house that the fire is approaching, ensuring they have an exit if required. Adequate drinking water will be provided.</p> <p>With all guests in the area of refuge, the Fire Warden or nominated staff will contact relevant family members. A team will be created to make regular exterior visual inspection of the farmhouse/shed and extinguish any embers or call 000 for assistance.</p>
<p>Road Closure or other hindrances</p>	<p>Whenever a direction to shelter in place is given from an emergency service authority guests who are unable to evacuate will shelter in place either in the farmhouse or shed at the top of the property. A designated Fire Warden will take control of the situation. They will remain calm and explain the shelter in place instructions.</p> <p>The Fire Warden will ensure everyone is accounted for and will advise the local emergency service (02) 6736 4150 that Mirumiru Bubbletent is sheltering in place and detail how many people are there and where they are on site.</p> <p>They will be asked to prepare for potential fire. This will include storing water in baths, sinks and buckets; preparing the outside of the house/shed for fire – watering the roof, storing water in gutters and downpipes, removing any outdoor furniture; sheltering in a room on the opposite side of the house that the fire is approaching, ensuring they have an exit if required. Adequate drinking water will be provided.</p> <p>With all guests in the area of refuge, the Fire Warden or nominated staff will contact relevant family members. A team will be created to make regular exterior visual inspection of the farmhouse/shed and extinguish any embers or call 000 for assistance.</p>
<p>Fire in close proximity and too dangerous to leave</p>	<p>If a fire is within 30 minutes from the Property it may be too dangerous to leave. Whenever a direction to shelter in place is given from an emergency service authority guests who are unable to evacuate will shelter in place either in the farmhouse or shed at the top of the property. A designated Fire Warden will take control of the situation. They will remain calm and explain the shelter in place instructions.</p> <p>The Fire Warden will ensure everyone is accounted for and will advise the local emergency service (02) 6736 4150 that</p>

	<p>Mirumiru Bubbletent is sheltering in place and detail how many people are there and where they are on site.</p> <p>They will be asked to prepare for potential fire. This will include storing water in baths, sinks and buckets; preparing the outside of the house/shed for fire – watering the roof, storing water in gutters and downpipes, removing any outdoor furniture; sheltering in a room on the opposite side of the house that the fire is approaching, ensuring they have an exit if required. Adequate drinking water will be provided.</p> <p>With all guests in the area of refuge, the Fire Warden or nominated staff will contact relevant family members. A team will be created to make regular exterior visual inspection of the farmhouse/shed and extinguish any embers or call 000 for assistance.</p>
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After the bush fire emergency

- a) Ensure the safety of all people and seek medical assistance for those requiring it. No person should re-enter any evacuated building until it is deemed safe to do so (this may be advised by emergency services and power/gas supply technicians). Follow the directions of emergency services personnel at all times.
- b) The fire warden (or person responsible) to arrange the movement of occupants back to the site and/or their separate accommodation.
- c) All occupants are to be accounted for on their return. Checking the Australian Red Cross 'Register, Find, Reunite' register.
- d) Inform the police/emergency service of the return of persons to the facility.
- e) Review the Emergency Evacuation Plan for effectiveness, make note of weaknesses and amend as necessary.
- f) From a property management perspective check on roof spaces in the house or shed to confirm the bush fire is out. If not, put out any fires.
- g) Check on animals, guests and neighbours. Do a head count of all guests.
- h) Evacuate all guests outside of the bush fire area if possible and have them return to their homes



EVACUATION PROCEDURES

Evaluation of the safety of employees and occupants has determined that it would be safer for ALL persons to evacuate to a designated refuge.

Designated assembly points

1. Federation Park, Petrie Street, Tenterfield Village
2. Tenterfield Showgrounds

Refuge (primary)

Name of venue (primary): Federation Park, Petrie Street, Tenterfield Village

Address of venue: Petrie Street

Nearest cross-street: Petrie and George Street

Map reference: <https://www.google.com/maps/place/Federation+Park/@-29.0469604,152.0163404,18.75z/data=!4m5!3m4!1s0x0:0xa3388ddfc57179d1!8m2!3d-29.0478749!4d152.0164899>

Phone number: [\(02\) 6736 5982](tel:0267365982)

Transportation arrangements

Number of vehicles required: Self-drive

Name of organisation providing transportation: Self-drive

Contact phone number: [\(02\) 6736 5982](tel:0267365982)

Time required to have transportation available: Self-driving and will have immediate access to own transport

Estimated travelling time to destination: 7 Minutes

Refuge (alternate)

Name of venue (alternate): Tenterfield Showgrounds

Address of venue: 75 High Street Tenterfield

Nearest cross-street: Miles Street.

Map reference: <https://www.google.com/maps/@-29.0567927,152.0155159,17z>.....

Transportation arrangements

Number of vehicles required: All guests and property manager

Name of organisation providing transportation: Self driving and will have immediate access to own transport

Contact phone number: 0499 885 386

Time required to have transportation available: Self-driving

Estimated travelling time to destination: 5 minutes

Before and at the commencement of the Bush Fire Danger Period, we will:

- a) Review the Emergency Bushfire plan
- b) Ensure an APZ is maintained via an annual works program to minimise the exposure of buildings and people to bushfire attack.
- c) Ensure water tanks are full.
- d) Ensure the main driveway, emergency access way/roadway to Bubbletents and Fire Service Access Route meet necessary standards. This includes ensuring the emergency access way, turn around areas and driveway are identified as “no parking” zones at all times and there are no obstructions to access ways, water outlet fittings and fire fighting equipment.

Procedures for evacuation in the event of a bush fire

Trigger	Action
<p>Watch and Act</p>	<p>Smoke or fire has been identified in the area.</p> <p>Evacuate older and medically unfit guests to designated refuge/alternate accommodation</p> <p>Fire Warden (or person responsible) to liaise with the police/emergency service giving evacuation orders and provide them with the number of persons and any support needs that are to be considered for transportation (if no on-site transportation is available)</p> <p>Guests are contacted by Property Management and ordered to evacuate and meet at the designated assembly area in Tenterfield village if safe to do so.</p> <p>Onsite Fire Warden(s) ensures all guests leave the property.</p>







	<p>Arrange for vehicles to pick-up of guests and depart. Contact off-site location and inform them of pending arrival. Move all persons to the assembly point for evacuation. Ensure all persons are accounted for prior to departure (use listing of guests).</p> <p>Ensure all site buildings have all doors and windows closed prior to leaving the site (farmhouse/shed).</p> <p>Arrange for vehicles to pick-up of guests and depart. Contact off-site location and inform them of pending arrival.</p> <p>The Fire Warden (or person responsible) is to advise the local emergency service (include phone number) that the centre is evacuating due to police direction (include how many people and where they are going).</p> <p>Move all persons to the assembly point for evacuation. Ensure all persons are accounted for prior to departure (use listing of guests).</p> <p>At refuge, move all persons inside and ensure all persons are accounted for and safe.</p> <p>The Fire Warden (or person responsible) is to advise the local emergency service (include phone number) that the all persons have been evacuated and are accounted for and safe at the refuge.</p> <p>After all the occupants are accounted for and safe at the refuge, nominated staff will commence contacting relevant families affected.</p> <p>Maintain situational awareness through radio, NSW RFS website, 1800 NSW RFS, smart phone applications and local firefighting resources.</p>
Emergency	<p>Fire has been identified in the area. Guests are contacted by Property Management and or Police/RFS and are ordered to evacuate. They are directed to meet at the designated assembly area in Tenterfield village or Tenterfield Showgrounds if safe to do so. Onsite Fire Warden(s) ensure(s) all guests leave the property.</p> <p>Ensure all site buildings have all doors and windows closed prior to leaving the site (farmhouse/shed).</p> <p>Arrange for vehicles to pick-up of guests and depart. Contact off-site location and inform them of pending arrival.</p> <p>The Fire Warden (or person responsible) is to advise the local emergency service (include phone number) that the centre is evacuating due to police direction (include how many people and where they are going).</p> <p>Move all persons to the assembly point for evacuation. Ensure</p>

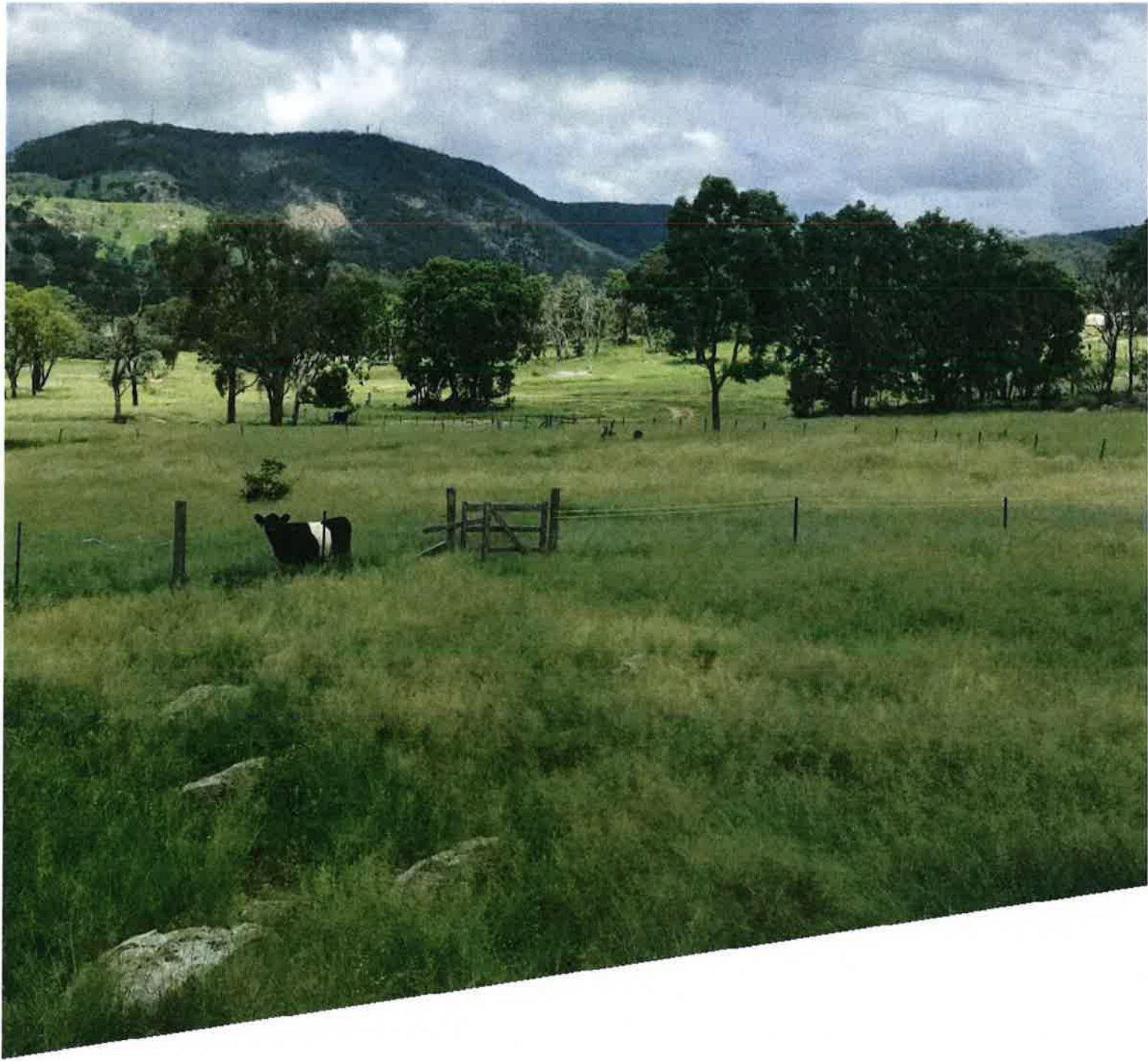
	<p>all persons are accounted for prior to departure (use listing of guests).</p> <p>At refuge, move all persons inside and ensure all persons are accounted for and safe.</p> <p>The Fire Warden (or person responsible) is to advise the local emergency service (include phone number) that all persons have been evacuated and are accounted for and safe at the refuge.</p> <p>After all the occupants are accounted for and safe at the refuge, nominated staff will commence contacting relevant families affected.</p> <p>Maintain situational awareness through radio, NSW RFS website, 1800 NSW RFS, smart phone applications and local firefighting resources.</p>
--	--

After the bush fire event

- a) When the bush fire threat has passed and the area is deemed safe by emergency services:
- b) ➤ No person should re-enter any evacuated building until advised by the emergency service.
- c) ➤ The Fire Warden (or person responsible) to arrange the movement of occupants back to the site and or their separate accommodation.
- d) ➤ All occupants are to be accounted for on their return.
- e) ➤ Inform the police/emergency service of the return of persons to the premises.

Attachments

-   Occupant/employee listing
-  Contact details for parents/guardians 
- Site Layout of Premises



MIRUMIRU BUBBLETENT PTY LTD

BUSHFIRE REPORT

JULY 2020 // PREPARED BY CATHYRN VAN DER WALT

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Mirumiru Bubbletent Pty.
Ltd. ACN 638032505
ABN 2147483647
8 Princess Street
Camp Hill QLD
4152
www.mirumirububbletent.com.au

SUMMARY:

APZ Locations and Details	<p>Campsite 1: Predominant grassland with granite outcrop and scattered eucalypts, >0 to 5 degrees downslope grassland vegetation, granite outcrop upslope vegetation.</p> <p>Campsite 2: Predominant grassland, >0 to 5 degrees downslope vegetation</p> <p>Campsite 3: Predominant grassland, >0 to 5 degrees downslope vegetation</p> <p>Campsite 4: Predominant grassland, >0 to 5 degrees downslope vegetation</p>
Landscaping Requirements	<p>The whole block has been slashed from boundary to boundary, fuel loads have been reduced and a bush fire hazard reduction burn is planned in advance of bush fire season.</p>
Access Provisions	<p>Street access to the block is available. Access to the rear via an access road is partially constructed. This will be completed following DA approval.</p>
Water supplies	<p>Two 20,000 litre water tanks have been established on site.</p>
BAL requirements	<p>Tenterfield Shire is FFDI – 80.</p> <p>Campsite 1: BAL-12.5</p> <p>Campsite 2/3/4: BAL-LOW</p>
Bush Fire Emergency Management and Evacuation Plan	<p>Appendix 1</p>

1 Introduction

This Bushfire Development Report (BDR) has been prepared by Mirumiru Bubbletent Pty Ltd to demonstrate how the proposed development of land for a primitive campsite at 57 Holleys Road Tenterfield NSW, will meet NSW planning and building controls that relate to bushfire, specifically the requirements for development in a Bushfire Prone Area (BPA) and AS3959.

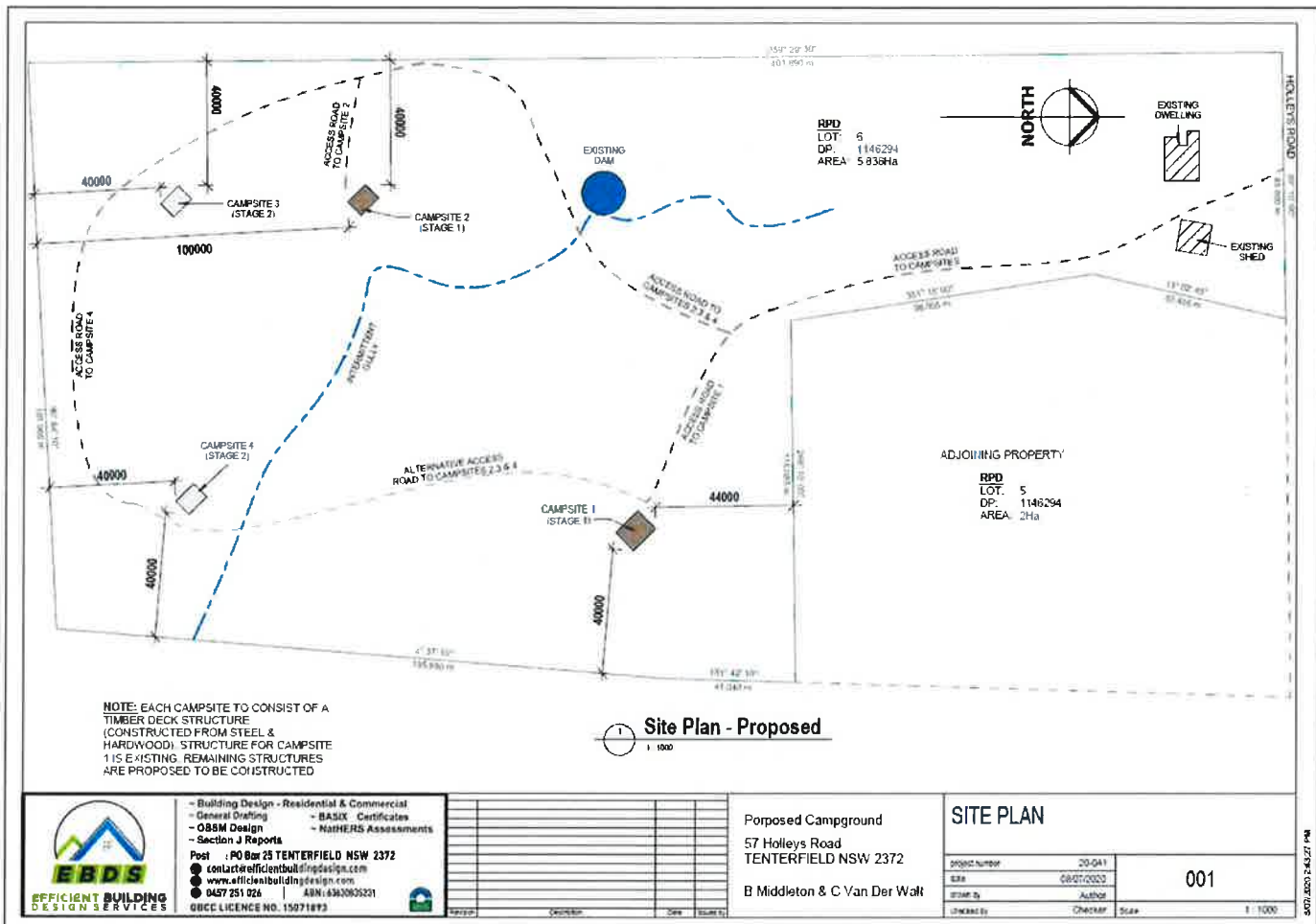


Figure 1: Site Diagram, also see Appendix 2

The Project area is located on a block in a designated Bushfire Prone Area (BPA), however the Project is not located in the affected area on the block (see Figure 6).

The Project is an off-grid glamping (primitive camping) operation and it will house 4 camping sites. Phase 1 will construct two sites and Phase 2 will construct a further two sites. Maximum occupancy will be 12 – 16 guests.

Stays are intended to be short term (2 – 3 days) and as such visitors may not have experience of bush fire areas. The emphasis is therefore placed on emergency management, leaving early and non-operation on days of extreme or catastrophic fire weather. These protocols and specific instructions and details for evacuation will be included in the digital guest welcome book, TouchStay (<https://touchstay.com/>). This service will be provided post DA-approval.

Touchstay Digital Guest Book Communications

There will be a section on Bush Fire management and it will include all advice on understanding bushfire danger ratings, downloading the Fires Near Me app, paying attention to the app and its warnings, knowing who to call (000) or 1800 NSW RFS (1800 679 737) in the instance of a bushfire starting, triggers to determine management and evacuation plans – plus the role of a fire warden for each tent during a stay and how they communicate with the onsite property manager. Also included will be a current version of the site layout in facility in visible location(s).

Clear communication channels and links will be provided for Guest Services Manager/Guests for NSW Rural Fire Service Website: rfs.nsw.gov.au and Fire Danger Ratings: rfs.nsw.gov.au/fdr, local radio and television plus social media links to [facebook.com/nswrfs](https://www.facebook.com/nswrfs) and twitter.com/nswrfs.

Bushfire planning activities have been completed on the block (see figure sets 3 to 6).

Prevention Activities Include:

- Renovation of farmhouse, complete with access to plumbed water.
- Construction of farm shed complete with access to plumbed water.
- Establishment of 2 x 20,000 litre water tanks adjacent to the farm shed with steel fittings to ensure they are accessible to fire appliances at all times. Both tanks have recently been filled due to rainfall and both tanks will be maintained at full levels.
- Establishing an APZ via an annual works program to minimise the exposure of buildings and people to bushfire attack.
- Plans to ensure the main driveway, emergency access way/roadway to Bubbletents and Fire Service Access Route meet necessary standards. This includes ensuring the emergency access way, turn around areas and driveway are identified as “no parking” zones at all times, there are no obstructions to access ways, water outlet fittings and firefighting equipment.

An internal road has been provided on the plan (see Figure 1 and Appendix 2) which meets the intent of the RFS advice on Emergency Management and evacuation.



Figure 2 – Water Tanks, located adjacent to the recently installed shed

mirumiru



Figure 3 – Site 1. To the left, right and front of the existing site.



Figure 3a – Site 1: Existing deck from a distance, with granite outcrop behind



Figure 3b – Site 1: Rocky outcrop behind Site 1



Figure 3c – Site 1: Rocky outcrop behind Site 1

mirumiru



Figure 4 – Site 2

mirumiru



Figure 5a – Site 3

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Figure 5b – Site 3



Figure 6 – Site 4

1.1 Project description

The project land comprises designated land within the site for the purposes of the Project at 57 Holleys Road. (see Figure 7, designated land marked by pink arrows).



Figure 7: 57 Holleys Road (Also known as Holleys Lane)

The wider project land includes

- Approximately four designated sections at the rear of the 6 ha block will be required, with each section approximately 600 m².

1.1.1 Staged Delivery

It is proposed to deliver the Project in two stages with stage 1 expected to be delivered by 2020 and stage 2 to be completed in 2021.

1.1.1.1 Stage 1 Infrastructure

Stage 1 is anticipated to deliver a deck facility in each location with the capacity to house one Bubbletent (PVC tent with clear roof structure for star gazing purposes) and one portable Tiny Bubble tent. Another site will house a single Bubbletent (see Figure 2, 3 and 3a).

The Stage 1 facility would occupy an area of approximately 4 hectares, and hardwood decks would be developed in the order of 8 metres long, 10 metres wide approximately for the two Bubbletents. The Tiny Bubble Tent does not require a deck.



Figure 8: Bubbletent

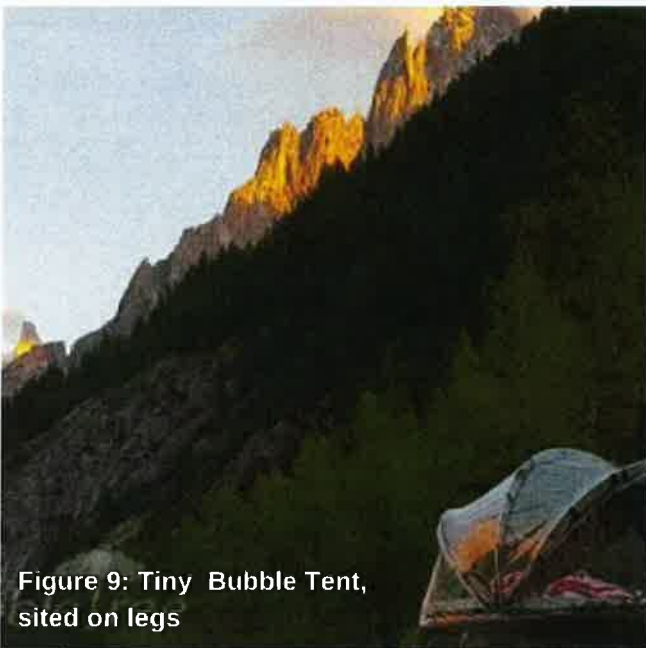


Figure 9: Tiny Bubble Tent, sited on legs



Figure 9a: Tiny Bubble Tent, suspended

Stage 1 is anticipated to comprise:

Initial site development

- Landscaping – slashed existing love grass, removed dead trees and reduced fuel load on the property. A bush fire hazard reduction burn for fallen/felled trees is also planned to further reduce fuel loads – this is expected to take place prior to bush fire season;
- Extending road access from 57 Holleys Road throughout the property to designated camping sites;
- Establishing clearly marked waste areas for rubbish and hard waste;
- Water storage and supply for consumption and firefighting use;
- Establishing car parking for drivers, visitors and cleaners.

1.1.1.2 Stage 2

It is anticipated that Stage 2 will increase the capacity of the Facility from two to four decked areas for separate use of Bubbletents. The Stage 2 facility is anticipated to occupy the original area of approximately 4 hectares, and hardwood decks would be in the order of 8 metres long, 10 metres wide approximately.

Stage 2 is anticipated to comprise:

Site development

- Landscaping – maintaining love grass, removing dead trees and reducing any further fuel load on the property
- Expansion of water facilities
- Emergency access road to the top of the block.

Construction Phase

1.2.1.1 Construction Activities

Key construction activities anticipated for the Project include:

Table 1 Construction Activities

Stage	Construction Activities
Stage 1	
Site Development	<ul style="list-style-type: none"> • On-site preparation; • Connections to water; • Security fencing and entrance/exit gates; • Road access from 57 Holleys Road;
Works	<ul style="list-style-type: none"> • Construction of internal roads, footpaths and car parking; • Construction of hardwood decks in two designated areas. • Landscaping;
Stage 2	
Works	<ul style="list-style-type: none"> • Construction of internal roads, footpaths and car parking; • Construction of hardwood decks in two designated areas. • Landscaping;

Being grazed farmland, the site is already substantially cleared of vegetation. The exception is two areas of linear shelterbelt vegetation (woodland) surrounding a spring fed creek and granite outcrop.

1.2 Operational Phase

This section describes the expected operational activities.

1.3.1.1 Operation of Glamping Facilities

The Facilities are anticipated to operate 24 hours a day, seven days a week. Visitors will enter and exit the facility from the main driveway at 57 Holleys Road.

The overall operational concept for the Facility is to provide a dedicated glamping area with car parking close to each Bubbletent.

1.3.1.2 Vehicle and Staff access

The primary access point to the Facility would be from 57 Holleys Road. Vehicles will be expected to exit the site the same way.

The primary access gate is to be utilised by staff and visitors to both enter and exit the facility.

The internal road layout would be designed to limit the need to cross the site. Adequate car parking spaces will be provided for staff and visitors. It is expected that car parking areas will be located to minimise walking distances to site facilities.

1.3 Site summary

Address:	57 Holleys Road, Tenterfield NSW 2372
Municipality:	Tenterfield Shire
Zone/s	Zone RU1 Primary Production

1.4 Location description

The site is located approximately 5km west of the Tenterfield village (see Map 1). The surrounding landscape includes grassed pastoral land as is seen in Figure 11.

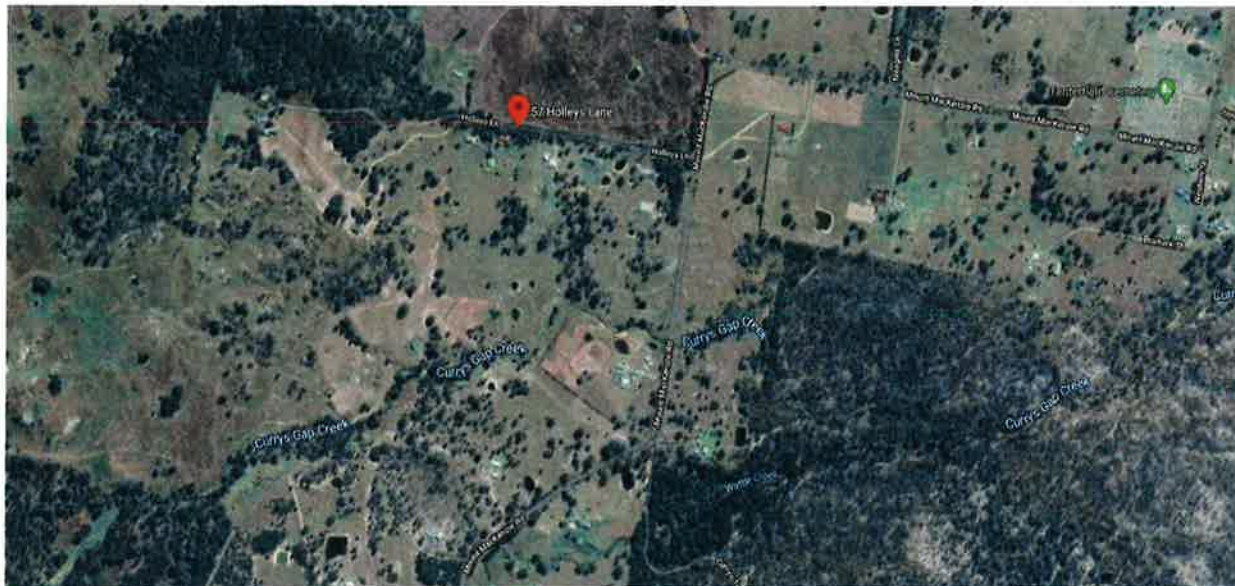


Figure 10 – 57 Holleys Road, Tenterfield, NSW.

2 Planning and Building Controls

This section identifies applicable bushfire planning and building controls.

2.1 Bushfire Prone Land (BFPL)

The Project is in a block in a designated Bushfire Prone Zone, however the Project is not located within this bushfire zone. The land is currently in the Zone RU1 Primary Production.



Figure 11 – 57 Holleys Rd (red outline) and BPA coverage (in red shading at top of block - roadside) (Source: RFS NSW).

3 Bushfire Hazard Landscape Assessment

One of the bushfire hazard identification and assessment strategies is to identify the hazard posed by vegetation, topographic and climatic conditions. This section includes a bushfire assessment to describe the landscape conditions, local conditions and neighbourhood conditions.

3.1 Local and neighbourhood conditions

The Project is located approximately 5km southwest of the Tenterfield village. The site is bounded to the north by Holleys Road. It is surrounded by pasture on private property.

The surrounding area is predominately pasture or other agricultural land.

It is possible for a large grassfire to develop in the surrounding landscape and potentially threaten the site. The fire grassfire, depending on the fuel condition, could be of significant size and intensity.

Under this fire scenario, if the entire Project site is maintained as low threat, the fire behaviour onsite will be greatly reduced, potentially to a level where the internal roads and other non-combustible surfaces may provide a fuel break of sufficient size to halt fire spread.

There is also some potential for a fire to be ignited on the site and spread into the wider landscape. Under elevated fire weather conditions, an ignition could develop, burning off the site and impacting neighbouring properties.

The vegetation management of the site, and the position of potential fire breaks (such as the roads and tracks around the boundary of the property) will increase the ability of fire crews to suppress a fire and prevent fire escape.

4 Bushfire Hazard Site Assessment

4.1 Vegetation

The AS 3959 site assessment process requires the identification of classified vegetation within 100m of the development.

It is recommended that the property be maintained as low threat (i.e. low grass cut to less than 100mm in height at all times). The grass within the site boundary will be maintained in a low threat condition at all times and steps have been taken to ensure the property already meets these requirements.

4.1.1 Grassland

Areas of pasture surrounding and within the site match the AS 3959 classification of Grassland, which is defined as all forms of vegetation including areas with shrubs and trees if overstorey foliage cover is less than 10%.

Note that Grassland that is mown or slashed to less than 100mm high, is considered 'low threat' and is

not classified as hazardous.

To the north of the site, a small patch of trees along Holleys Road are at the boundary of the 100m assessment zone and a recent development application for the removal of a house to this block has met all fire hazard requirements. They are sufficiently separated from the structures and shed on the site to not be an influence on the bushfire attack on any buildings.

4.12 Excluded vegetation and non-vegetated areas

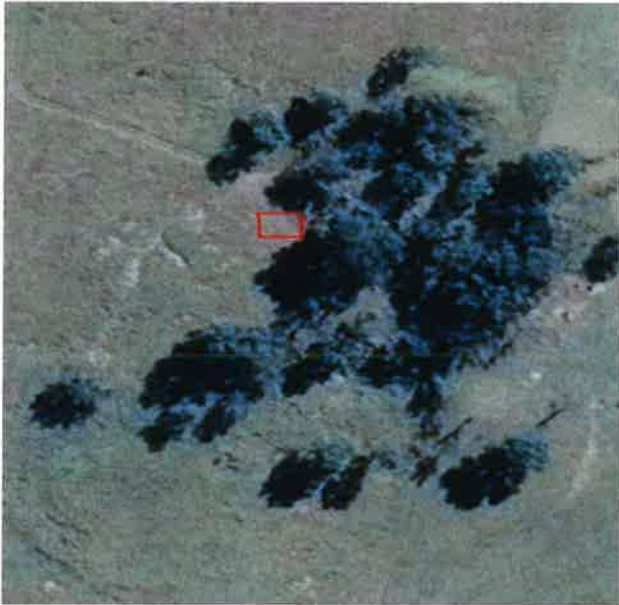


Figure 12: Site 1: Adjacent rocky outcrop

Areas of low threat vegetation and non-vegetated areas within 100m of Site 1 can be excluded from classification in accordance with AS 3959, if they meet one or more of the following criteria:

- i. 'Vegetation of any type that is more than 100m² from the site.
- ii. Single areas of vegetation less than 1 ha in area and not within 100m of other areas of vegetation being classified vegetation.
- iii. Multiple areas of vegetation less than 0.25 ha in area and not within 20 m of the site, or each other, or of other areas of vegetation being classified vegetation.
- iv. Strips of vegetation less than 20 m in width (measured perpendicular to the elevation exposed to the strip of vegetation) regardless of length and not within 20 m of the site or each other, or other areas of vegetation being classified vegetation.
- v. Non-vegetated areas, that is, areas permanently cleared of vegetation, including waterways, exposed beaches, roads, footpaths, buildings and rocky outcrops.
- vi. Vegetation regarded as low threat due to factors such as flammability, moisture content or fuel load. This includes grassland managed in a minimal fuel condition³, mangroves and other saline wetlands, maintained lawns, golf courses (such as playing areas and fairways), maintained public reserves and parklands, sporting fields, vineyards, orchards, banana plantations, market gardens (and other non-curing crops), cultivated gardens, commercial nurseries, nature strips and windbreaks' (Standards Australia, 2018).

All grass areas will be managed at 100mm high and for Site 1 it is adjacent to low threat vegetation and a boulder pile.

5 Planning and Building Controls

Note that the findings and recommendations of this section relate to both Stage 1 and Stage 2 of the project.

5.1 Development

5.1.1 Building compliance

The project involves the construction of 1 – 4 decks for the location of up to 4 Bubbletents. Upon completion, approximately 12 visitors maximum for Mirumiru Bubbletent Pty Ltd will be onsite during operating hours.

5.1.2 Vegetation management

The property intends on meeting BAL-12.5 requirements and a minimum area of non-vegetated land or 'low threat' vegetation (e.g. grass mown to less than 100mm high) will be maintained around each Bubbletent in the lead up to and during fire season.

There will be a 100m defensible space around each deck area. Although it is recommended that the entire site will be managed in a low threat state, this defensible space represents the minimum area required around buildings built to BAL-12.5. Any landscaping within the defensible space area should aim to meet the standards for defensible space.

This will include physically removing excess leaf litter, dead plants and accumulated fine fuels or undertake a fuel reduction burn to adequately remove these fuels. Some shrub and scrub plants will be pruned and all trees and taller shrubs will be low pruned from the ground up as required to further separate fine fuel loads.

5.1.3 Access and Water

The site has a sealed road linking to an internal gravel road with two-wheel drive all weather access. There are no obstructions such as trees or vegetation on these roads. This will ensure easy evacuation for both site occupants and emergency services, including firefighting vehicles. The road to the Bubbletents is at least 3.5m inwidth.

A static water supply for fire-fighting is provided with 40,000L capacity provided and maintained for firefighting purposes and provided with appropriate fittings, road signage and access. Additional portable firefighting equipment will be stored on location for mobile firefighting responses. There are also two additional dams on the property, together with a spring fed dam that has the capacity to hold water.

5.1.4 Preventing ignition and fire spread onsite

Activity on the site may result in an ignition which, under elevated fire weather conditions, may spread beyond the property boundaries. The likelihood of an ignition will be reduced by applying the following actions:

- **Managing grass on the site in a low threat state (i.e. <100mm in height).**
- **Prohibiting smoking at all times on the property.**
- **Developing a hot works policy that articulates restrictions on hot works (in line with, or additional to, the total fire ban day restrictions) and fire suppression equipment requirements (such as having an extinguisher on hand).**
- **Ensuring all staff and guests are aware of the ignition controls and abide by all relevant policies and procedures.**

In the event of a Total Fire Ban, catastrophic weather warning, or bushfire, the Bushfire Plan will be activated. This means no fires must be lit or used in the open air; all open fires for the purpose of cooking or camping are not allowed; and 'hot work' such as metal work, grinding, welding, soldering, gas cutting or similar is not allowed unless there is an exemption.

5.2 Bushfire

In the case of a bushfire the Bushfire Emergency Management and Evacuation Plan will be activated with the sole focus on the protection of human life.

This plan is documented in **Appendix 1: Bushfire Emergency Management and Evacuation Plan.**

6 Conclusion

The bushfire risk to the proposed Primitive Camping Ground at 57 Holleys Road, will be managed by a number of mitigating measures.

These are:

- Protection of the site overall, by managing vegetation within the property boundaries in a low threat state (all grass to be maintained in a low threat state, nominally at a height of less than 100mm); providing a water supply in accordance with RFS requirements; and access in accordance with RFS requirements;
- The development of policies and procedures to minimize the likelihood of an ignition and subsequent spread off-site, of a bushfire from site activities; and
- The development of a Bushfire Emergency Management and Evacuation Plan (BEMP) to manage the risk of ignitions and potential impact of a bushfire to people onsite.

Tamai Davidson

From: Council
Sent: Thursday, September 3, 2020 9:56 AM
To: Tamai Davidson
Subject: FW: Re reference IN20/3250CCCF Development application No 2020.069 Primitive Camping Ground

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

From: I
Sent: Wednesday, 2 September 2020 5:43 PM
To: Council <Council@tenterfield.nsw.gov.au>

Subject: Re reference IN20/3250CCCF Development application No 2020.069 Primitive Camping Ground

Manager of Planning & Development Services Ms Tamai Davidson Dear Madam,

We refer to the above Development Application.

We have no objection to the above application but wish to draw Council's attention and the Applicant's attention to the following points of concern, for consideration:

1. ELECTRIC FENCING

The applicant's property, 57 Holleys Rd, is fenced with an electric fence on the western boundary of their property, between their property and our property Yoorooga. This is to prevent town dogs from attacking our stud sheep.

We have signs on the fence but how does the applicant intend to warn campers of this danger?

2. HOLLEYS ROAD (Council Road)

Holleys Road would NOT be in suitable condition for the use of up to two thousand tourists each year, in its present state.

Is council going to upgrade the present road? It would need to be rebitumened/resurfaced and new signage, perhaps speed signs put in place to consider present residents along the road.

At present it is riddled with large pot holes and during heavy downpours it becomes untrafficable, as the present pipes can't take the amount of water flowing down the gutters.

Part of the applicant's permission may require a contribution to upgrade the road. This was required of us twice by council in the past.

3. DOGS

Are dogs accompanying guests? As this property borders an established merino stud, as well as other small holders, what is the applicant's position regarding dogs. If dogs are welcomed with campers, what steps will be taken to prevent dogs attacking the stud sheep on our property? Sheep would be worth at least four hundred dollars each, so we would not like to see their guests getting involved in this sort of trouble.

4. ACCESS ROAD ALONG WESTERN BOUNDARY of 57 Holleys Rd Is the applicant aware that a new internal access road (already surveyed) is planned for our property (providing access to our back blocks)?

The road will run adjacent to the western boundary of 57 Holleys Road, from 63 Holleys Rd all the way along our shared fence line. The entrance and gate for this road is already in place - 63 Holleys Rd.

This could be a problem for the proposed bubble tents (Campsite 2 and Campsite 3 on their plans) to have a road so close. To have traffic passing these present sites would not be good regarding dust in dry times and could present privacy problems for campers and neighbours.

5. FARMING ACTIVITIES/NOISE

Is the applicant aware that farming and cultivation takes place in our paddocks, on their boundary near the western and southern end each year? Sheep are held to lamb in these paddocks, so livestock noise will be evident at night particularly.

We have met the applicant Mrs Cathryn van der Wait and would be happy to discuss any features or concerns arising from the above. The idea being to solving any problems now, so that we experience no problems in the future.

Thank you,

A small, handwritten signature in dark ink, appearing to be a name followed by a surname, located below the 'Thank you,' text.

TENTERFIELD SHIRE COUNCIL		
- 7 SEP 2020		
	Action	Info
CE		
CCO		
COO		

3rd September 2020

Chief Executive
Tenterfield Shire Council
Box 214
Tenterfield

RE D: A 2020.069, PRIMITIVE CAMPING GROUND

Dear Chief Executive,

Please find the following submission outlining my **OBJECTIONS** to the proposed establishment of a Primitive Camping Ground at this location.

There are many grounds for my objection to be considered, none of which is minor or inconsequential. They follow in numerical sequence which should not be read as of holding a numerical priority of importance.

1. The nominated site is all down hill from my property with some intervening rocky outcrops all of which make **fire** control difficult should a fire occur with the wind in a south westerly direction.
2. **Bushfire evacuation.** Recently Holley's Road was closed due to fires in the region. No traffic was permitted on the road which is a one lane narrow and badly constructed sealed road. The surface is currently very pot-holed and would need a major upgrading if an increase in traffic load were to be considered.
3. It has the potential to destroy the **Amenity of Quite Enjoyment** for which I purchased the property a few years ago.
4. **No advice** was given to me by Council at the time I purchased my property to indicate that a Commercial/non Agricultural activity was to be permitted. I feel that should it 'go ahead' then my original purpose of buying approximately five acres out of town has been abrogated by Council for which I would strenuously object.
5. **Noise** emanating from the proposed site could be considerable given the low level of ambient noise that currently obtains. Sound frequently propagates 'up-hill' which puts my property in the firing line. **Traffic** noise levels from the existing Holley's Road could be excessive given that occupiers may return to site late at night. The current ambient noise level was a factor in me deciding to purchase my property.
6. **Waste** disposal from human and general garbage would considerably add to the existing removal/remediation debt.
7. **Dust** generated by internal traffic and human activity would impact on my property just as would the noise as previously mentioned. The winds are frequently from the south-west in direct line with my property.
8. **NIMBY** : This acronym may sound simplistic but when it impacts on an individual as it would in my case then it is appropriate.
9. **Negative Impact on future property values** could be considerable. It is hard to see that this project would enhance the future values of the existing neighbouring properties. Three high quality houses have been built in the last few years on adjacent sites where the owners

all looked forward to enjoying the prospect of living in a nice quiet place with the prospect of values at least maintaining their strength.

Finally in summary I strongly object to this application for all of the above reasons and hope that Council can see the merit in my reasons for such an objection.

Faithfully

A redacted signature consisting of several horizontal black bars obscuring the name and any handwritten notes.

1000 1197 1100/2000000

TENTERFIELD SHIRE COUNCIL		
9 SEP 2020		
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Tenterfield 2372
7th September 2020

Chief Executive
Tenterfield Shire Council
Box 214
Tenterfield 2372

Re: DA 2020.069 Primitive Camping Ground

E-MAILED
Date 7/9/2020
And 2/9/2020.

Dear Chief Executive,

On 2/9/2020 we submitted to Council, and to the Manager of Planning and Development Services, Ms Tamai Davidson, a letter outlining some concerns and suggestions to the applicants of this DA. (see attached)

We hereby submit a formal letter of objection to the proposal in its present form.

Our Objections are listed below.

Holleys Rd is a narrow and quiet rural residential road, comprising five homes on acreage as well as our Merino Stud, a long established farming enterprise at the end of the road, bordering on the proposed development. The development will impact on the residents and the natural environment in the following ways.

Critically important issues of objection.

It is essential these are addressed and resolved before there is any consideration of progress of the application.

The following issues will impact on Tenterfield Shire Council, The Applicant Mirumiru Bublelent Pty Ltd, Neighbours on Holleys Rd and Campers using the Primitive Camping Ground.

The duty of care relating to Council and the applicant is of the utmost importance to the projected guests and the current residents of Holley's Lane.

1. **FIRE DANGER, SAFETY AND COMPLIANCE - Must be addressed**

We draw your attention to

The NSW Rural Fire Service Document

Planning for Bush Fire Protection November 2019

https://www.rfs.nsw.gov.au/_data/assets/pdf_file/0005/174272/Planning-for-Bush-Fire-Protection-2019.pdf

The land under proposal, 57 Holleys Rd, is Designated as Bush Fire Prone Land (BFPL) on the RFS website. (see attached map p 1/2)

WHY IS TENTERFIELD COUNCIL PLACING AT RISK ALL RESIDENTS IN HOLLEYS RD AND POSSIBLY TENTERFIELD ITSELF BY EVEN CONSIDERING A DEVELOPMENT WHICH PERMITS INEXPERIENCED NATIONAL AND OVERSEAS VISITORS TO LIGHT FIRES IN SUCH A ZONE? 24/7, 7 DAYS A WEEK, 12 MONTHS PER YEAR - A PRESCRIPTION FOR DISASTER - UNDER COUNCIL'S WATCH.

Why hasn't NSW RFS been involved and consulted by Council, regarding the Bush Fire Protection Principles as listed in the above quoted RFS Document (see attached p 10)

The sole Access Road, Holleys Rd, can be cut at any time by fire or water, as it was last year, which will certainly prevent this development going ahead. (see attached p29)

If fire was to escape onto our property, Yoorooga Merino Stud, hundreds of sheep would be burnt to death.

This new Development, if approved by Council, can only multiply the bushfire risk and ignore the lessons learnt from last year's bushfire emergencies.

If Council does not take action we will appraise the Tenterfield Star of the situation and seek advice from NSW RFS regarding the development.

* The only issue addressed in the application relates to Emergency Procedures in the EVENT of a Fire.

* It is essential to PREVENT fire.

The proposed "annual slashing" will go no way to averting this danger.

One dropped match can mean disaster for campers, neighbours, Tenterfield residents.

* All concerned parties need written detail of Fire Safety Regulations, Fire Permit procedures for Management, awareness of changes in Bushfire Fire seasons and Danger levels, Fire control regulations on site (campers use of matches for heating, campfires ..)

* An assessment should be carried out by the Council, Rural Fire Service and Fire and Rescue that demonstrates the position, shape of the block and emergency access points meet the required safety standards. This is essential.

* Fire permits are required by the Rural Fire Service according to weather conditions throughout the year.

How are these applications for permits to be made and demands of local fire conditions met and monitored?

Inexperienced and uneducated campers enjoying their "primitive bush experience" on Holleys Rd present a very real fire danger to neighbours and to Tenterfield town itself.

The recent terrifying 2019 fire, which swept from Mt Mackenzie Rd through the Saddlers Estate to Dairy Mountain destroying homes and livelihoods, began with one match dropped close to town on the Mt Mackenzie Rd, not far from Holleys Rd.

A later 2019 fire swept from the Kildare Rd through to both sides of Holleys Rd, closing the road and requiring evacuation of some residents as well as almost a week of on ground fire fighting and water bombing by Rural Fire Service and Fire and Rescue.

If fire at the proposed camp ground was to ignite the love grass (which is highly flammable) (camp fires, bathing fires) the entrance and shape of the block would not allow for a quick response from ambulance and fire trucks. Entry is narrow, through one small gate since the block is battle axe shaped. RFS Principles must apply here, for access and egress.

Campers would have no way to escape except through the one shared narrow entrance, where fire trucks, police and ambulance would be trying to enter. A disaster waiting to happen.

* No smoking, no campfires, no matches!

2) A DETAILED ONSITE MANAGEMENT PLAN - Must be addressed

*There is no mention of onsite Management personnel or a Management Plan in the application or how this will be monitored and regulated.

With such close proximity to residences and farms this will be critical to ensure campsite rules for safety and compliance (fire, noise, internal road usage, dust, dogs etc) are followed as requested by the applicant. Responsibility rests with the Management, not an appointed, untrained, camper's honesty.

3) A DETAILED DEVELOPMENT APPLICATION PROPOSAL - Must be addressed

The PROPOSAL is non specific, full of ideas but lacking in the DETAIL requisit to provide Council and neighbours with information of a functional framework and safe management practices going forward.

The details supplied by the applicant are very 'folky' in nature; even the pages of the Bush Fire Emergency and Management Plan are not numbered sequential to the proposal, due to the cut and paste nature with infill of details. Was the detail Bushfire Emergency Management Plan supplied by the Grafton Personnel, who do the normal house fire reports?

4) ENVIRONMENTAL IMPACT STUDY - Must be addressed

* Council and/or the applicants must carry out an Environmental Impact Study to assess the impact of the proposed primitive camping development on the local wildlife in this area and on the residents of Holleys Rd. Residents, who have purchased five acre lots, to live quietly in the country. This should be performed by a qualified Environmental Officer.

* Of specific wildlife concern is the native bush and rocky outcrop on the eastern boundary, adjacent to Campsites 1 and 4, and the established large stands of gums along Holleys Rd which provide a natural habitat and wildlife corridor. This is an area well known for King brown snakes, as well as the EASTERN SPOTTED QUOLL recorded and sighted by several residents in the immediate area. Tawny frogmouths nest each year in the large gum trees in front of neighbouring 49 Holleys Rd.

Other local wildlife to protect, all present in the immediate area are pretty face wallaby, kangaroos, kookaburras, butcher birds, finches and crimson rosellas.

* Since the recent bushfires, a project has been operated under the auspices of the Granite Borders Landcare group to assist in re-establishing fire affected native wildlife by the distribution of nest boxes for native birds and animals.

The projected increased human activity in the area significantly challenges this project (two thousand people a year projected by applicant)

5) HOLLEYS RD CONDITION - Must be addressed

* Council and/or the Applicant MUST provide an upgrade of bitumen, widening, drainage work, speed limitation, signage, turn in/out lane from Mt Mackenzie Rd, in order to carry the proposed traffic safely and ensure safety for existing residents!

* Council has required financial contribution to roadworks from any previous development on Holleys Road (subdivision, cul de sac and property access) The current Applicants must meet the same requirements, making a financial contribution to upgrade the road in order to meet the demands of increased traffic directly resulting from their development.

- * The current state of Holleys Rd is deplorable, a poor advertisement for a Council maintained road. It is riddled with a multitude of bitumen patches over deep potholes, the bitumen surface is so thin it is wearing through.
- * In heavy rain the current drains and pipes cannot take the water and toward the eastern end Holleys Rd is submerged and often impassable.
- * The road is narrow, one way at best. Residents presently have to pull over onto the verge to allow others to pass.
This is the condition of the road with only usage from 6 residents. Consider the condition if increased to 2000 tourists per annum!
- * Vegetation regrowth management by council at the intersection to Mt Mackenzie Rd appears non-existent, turning out is dangerous. Current residents are aware of the conditions and take precautions, campers will not be so familiar with conditions.

6) NO PETS TO ACCOMPANY CAMPERS - Must be addressed

- * No mention is made in the application as to whether dogs can accompany campers.
- * With our stud sheep enterprise bordering the development there is a very real danger of visiting dogs invading our valuable sheep flock, despite our electric fence boundary with signs in place.
- * The other Holleys Rd neighbours, all small hobby farmers with poultry, alpacas, sheep or cattle would be at the mercy of visiting dogs. Wandering town dogs, later identified and caught by the Shire Council Ranger, have just this week destroyed five sheep and one alpaca in the Holleys Rd vicinity.
- * No pets should be allowed with campers.

7) PRIVACY, PROXIMITY, ZONING

- * Our farming activities will create issues for campers.
These farming activities are in place and non-negotiable.
- * We have a surveyed access road running North South on the campsite's western boundary. This gives access to our back paddocks, so internal traffic exists and would increase if the back blocks are sold to another party. This road is 40 metres from projected sites 2 and 3.

* We have livestock in lambing paddocks, cultivation activities, daily use of ag bikes and trucks all taking place directly adjacent to the western campsites 2 and 3. This will create noise and will impact on the personal privacy of the campers - in their outdoor baths!!

* Our rates zoning is Farmland General and farming is what we do.
Other zoning along the road is Rural Residential or Residential Other.
Is it appropriate to conduct a Camping Business abutting residential zoning along Holleys Rd?

OTHER PROBLEMS WE HAVE WITH THE APPLICANTS DA FOR A 'PRIMITIVE CAMPING GROUND'.

The duty of care relating to Council and the applicant is of the utmost importance to the projected guests and the current residents of Holley's Lane.

In pursuit of this could we receive a response to the following questions:

1. What management of the site is planned? Where will the management be located? In Tenterfield or Brisbane? If campers or neighbours have a concern where is the first point of contact? If guests have concerns or are in danger, where do they seek help? A large sign needs to be erected giving details of phone numbers and e-mail addresses.
2. Are dogs allowed on site with guests? If so, stated plan to control dog attacks of native and domestic stock.
3. Is there a plan to care for native animals and birds? The site is not just an 'old grazing site', rather residents of Holley's Road have cared about the animals listed above. Two thousand people a year will have an effect on protected wild life especially the very rare spotted quoll, birdlife and many possums, who live up the road.
4. Will the applicant be asked to make a contribution towards the upgrade of the one lane road, known as Holley's Road? We have given council close to twenty thousand and the previous developer gave fifty four thousand to council for the road. Council has spent very little on this road. It seems fair that the applicant make a significant donation to cater for the two thousand extra cars a year predicted by the

applicant. A turning lane off the Mt Mackenzie Road is required, upgrade of the road surface and widening of the road from a one lane to two lane road is asked for by all the residents on the road.

5. We note that nominated guests are to act as fire wardens on the site. What training will each guest receive and what specific criteria will be used to ascertain if the guest is able to perform this task?

Visitors from overseas (we gather this will be a large proportion of guests) who don't speak English, have poor english and is not aware of the dangerous fire and weather conditions in Australia will be very hard to train and to give these people this responsibility of fire warden must be of concern for council and the fire personnel. What guides lines are in place for these people.

6. Will there be a phone on site? This would seem a responsible step.

7. What level of Public Liability will Council require the applicant to carry to protect residents and responsible guests from careless or negligent guests?

8. Are electrical and fire extinguishers installed on every bubble, sheds and house?

9. What plan is in place for fire trucks to be able to locate the four bubbles, especially at night?

10. Will water sites, tanks and dams be clearly marked for night time location of fire trucks?

11. How much water is available on site to fight grass fires as love grass is an intensely hot fire and ignites quickly?

12. What fuel will be used to fuel the hot water and camp fires?

13. Is council concerned about the narrow entrance to the site and the shape of the block itself in relation to fighting fires?. Escape is only available through one entrance and the block is battle axe shaped.

14. Schoolchildren currently have to walk or ride pushbikes down Holley's Road every day to board a bus on the Mt Mackenzie road. What aspects are being considered to protect the safety of these children from the two thousand cars a year projected by the applicant?

15. Does the council show any care or concern about any impact on long term residents and ratepayers?

Most residents on Holleys Rd were ignored when Neighbour Notification was posted out by Council. Some have still not received the mailing. The submission time was only 12 days.

16. The site is very prone to lighting strike, especially near bubbles one and four. (Three last year) What plans are in place for such an outcome ?

17. What plans are in place for snake bites as the area is prone to large King Browns snake ? Are guests being warned and does our hospital carry the necessary vaccine to treat guests if bitten?

18. What is the flammability fire rating on the Bubbletents. Have the RFS Fire Service read the details of same, considering the location in Bush Fire Prone Land.

19. Would ambulances be able to safely locate the bubble sites and locate them at night?

20. Is alcohol allowed on site? If so what plans are in place to control unruly behaviour? Once again a situation conducive to negligence with regard to fire responsibility.

21. Is smoking allowed on site? See above.

22 . With the sole access road (Holleys Rd), a No Through Road, that can at any time be blocked (a fire starts on 57 Holleys Rd and travels to the east and north) preventing access to fire trucks and ambulances, or escape for residents and campers. How can Tenterfield Council possibly approve such a development?

How are we going to escape from our property?

We had to escape twice last year. This new Development, if approved by Council, can only multiply the bushfire risk and ignore the lessons learnt from last year's bushfire emergencies.

23. Why has Council allowed the Applicant to construct the new decking at 57 Holleys Rd, for the Bubbletent (at Campsite 1 Stage 1 on the Proposed Site Plan) **before** the DA has been approved?

Also prior to Council notification to Residents and neighbours, with opportunity for them to make submissions or objections regarding the DA.

This equates to a resident building a house before all relevant Council approval.

We assume Council has inspected the decking and approved it. Is that so?

We look forward to your response to these questions, for us and all the residents on Holleys Rd,

Yours Sincerely,



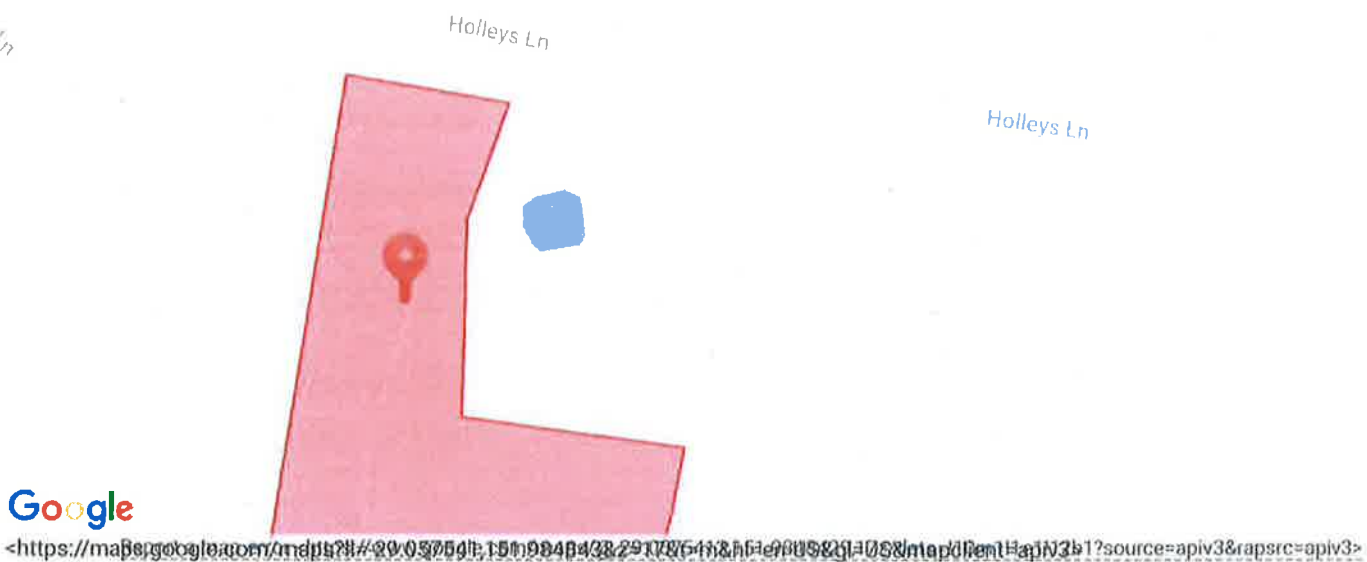


NSW RURAL FIRE SERVICE

Check if you're in bush fire prone land

Your Property

57 Holleys Rd.



Google

<<https://maps.google.com/maps?hl=en&ll=-30.057541,151.984843&zoom=17&hl=en&mapid=058mapid=1&mapid=1?source=apiv3&rapsrc=apiv3>>

Your search result

You have conducted a search of the online bush fire prone land tool for the land in the map above. This search result is valid for the date the search was conducted. If you have any questions about the Bush Fire Prone Land Tool please contact bushfireprone.mapping@rfs.nsw.gov.au



The parcel of land you have selected is within a designated bush fire prone area.



Make sure you have completed the four simple steps to prepare for bush fires

In a bush or grass fire, minutes can matter. You need to take action now. Getting ready for a bush fire is easier than you think. By taking 20 minutes with your family to discuss what you'll do during a fire, you could save their lives, as well as your home.

There are four simple steps to get ready for a bush fire:

P1

**STEP 1: DISCUSS**

Discuss what to do if a bush fire threatens your home.

**STEP 2: PREPARE**

Prepare your home and get it ready for bush fire season.

**STEP 3: KNOW**

Know the bush fire alert levels.

**STEP 4: KEEP**

Keep all the bush fire information numbers, websites and the smartphone app.

Download our guide to making a bush fire survival plan <<https://www.rfs.nsw.gov.au/plan-and-prepare/bush-fire-survival-plan>> and start your discussion today.

- As your property is bush fire prone you should consider reviewing your household insurance to check you are covered for the cost of complying with the necessary bush fire protection measures.
- You should also look at upgrading the protection of your property from bush fire, especially if the dwelling has not been constructed with bush fire protection measures incorporated into its design. To check what you could do to improve your property, download the Building Best Practice Guide <https://www.rfs.nsw.gov.au/_data/assets/pdf_file/0018/4365/Building-Best-Practice-Guide.pdf>.

It's a fact. If you and your home are well prepared, you stand a better chance of surviving a bush fire. For more information on preparing your home visit our Plan and prepare section <<https://www.rfs.nsw.gov.au/plan-and-prepare>>.

Planning development on your property?

Any proposed development upon the property will be required to comply with Planning for Bush Fire Protection for new works.

More information is available in our building in a bush fire area <<https://www.rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area>> section including information on types of development, legal obligations, bush fire protection measures and how to get further assistance.

The NSW RFS provides extensive information and resources to assist people interested in preparing their homes and families against the risk of bush fires. Try some of the useful links below for more information:

- Download a guide to making your bush fire survival plan
- Download the Bush Fire and Your Home fact sheet
- Download the Prepare. Act. Survive fact sheet
- Visit our Farm Fire Safety page

New Search

Print

1.1 Aim and objectives

* All development on BFPL must satisfy the aim and objectives of Planning for Bush Fire Protection (PBP).

The aim of PBP is to provide for the protection of human life and minimise impacts on property from the threat of bush fire, while having due regard to development potential, site characteristics and protection of the environment.

The objectives are to:

- > afford buildings and their occupants protection from exposure to a bush fire;
- > provide for a defensible space to be located around buildings;
- > provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings;
- * > ensure that appropriate operational access and egress for emergency service personnel and occupants is available;
- > provide for ongoing management and maintenance of BPMs; and
- > ensure that utility services are adequate to meet the needs of firefighters.

1.2 Bush fire protection principles

Bush fire protection can be achieved through a combination of strategies which are based on the following principles:

- > control the types of development permissible in bush fire prone areas; *
- > minimise the impact of radiant heat and direct flame contact by separating development from bush fire hazards;
- > minimise the vulnerability of buildings to ignition and fire spread from flames, radiation and embers;
- > enable appropriate access and egress for the public and firefighters; *
- > provide adequate water supplies for bush fire suppression operations; *
- > focus on property preparedness, including emergency planning and property maintenance requirements; and
- > facilitate the maintenance of Asset Protection Zones (APZs), fire trails, access for firefighting and on site equipment for fire suppression.

2.1 Legal framework

The Environmental Planning and Assessment Act 1979 (EP&A Act) and the Rural Fires Act 1997 (RF Act) were amended on 1 August 2002 to enhance bush fire protection in the development assessment process.

The NSW land use planning framework provides, in broad terms, two main phases: strategic planning and development assessment.

PBP provides the foundation for the application of bush fire protection during both of these phases of development. Appropriate consideration of bush fire hazards at the strategic planning phase is required by the EP&A Act s.9.1(2) and PBP should be considered in applying the Section 9.1 Direction.

At the development assessment phase, development on land that is identified as being bush fire prone must comply with PBP. Some types of development on BFPL can be undertaken as Complying Development and must also comply with PBP.

A bush fire safety authority (BFSA) is required from the NSW RFS for residential and rural residential subdivision and SFPP developments on BFPL. An application for a BFSA must address the extent to which the development complies with PBP.

Building work on BFPL must also comply with the requirements of the National Construction Code (NCC). The NCC contains the technical provisions for the design and construction of buildings. Under the Deemed to Satisfy provisions of the NCC, building work on BFPL must comply with *Australian Standard 3959:2018 Construction of buildings in bushfire-prone areas (AS 3959)* or the *National Association of Steel Framed Housing (2014) Steel Framed Construction in Bush Fire Areas (NASH Standard)*. This does not apply however in Bush Fire Attack Level - Flame Zone (BAL-FZ), or where modified by the specific conditions of the relevant development consent.

2.2 Bush fire prone land mapping

The identification of BFPL in NSW is required under the EP&A Act s.10.3.

BFPL Maps provide the trigger for the various development assessment provisions.

The Commissioner of the NSW RFS designates what constitutes BFPL and how it is to be mapped. Each council prepares a map in accordance with the guidelines and submits the map to the NSW RFS for certification by the Commissioner. These maps are required to be recertified at least every five years and the Commissioner may make direct changes to a BFPL Map at any time.

Guidelines for the mapping of BFPL can be found on the NSW RFS website at www.rfs.nsw.gov.au.

You can determine whether a site is mapped as being bush fire prone by referring to the BFPL Map which is held by the local council, or on the NSW RFS website.

The BFPL Map is a trigger for the consideration of BFPL Maps for new development. It is not intended as a detailed measure of risk. The map does not form part of the site assessment process, which must be carried out in accordance with Appendix 1.

A consent authority can refer a development application (DA) to the NSW RFS under the provisions of EP&A Act s.4.15, even where it is not mapped as BFPL.

→ SFPP development - a hotel, motel or other tourist accommodation

3.3 Building construction, siting and design

The appropriate design and construction of buildings enhance their survivability from bush fires. Construction measures should not be applied as a stand-alone mitigation solution, but should form part of a suite of BPMs. This should also include APZs, appropriate access, water supply and landscaping.

Building design needs to ensure adequate protection of vulnerable building elements. Construction standards are outlined in AS 3959 and the NASH Standard to provide various levels of protection for different building elements.

The level of building construction standard required is based on the FFDI, type of vegetation, the effective slope and the size of APZ. Appendix 1 provides the required methodology for assessing the building construction standards referred to in AS 3959 and the NASH Standard as BALs.

The construction requirements of the NCC are applied in addition to variations to these standards which are discussed in Chapter 7.

3.4 Access arrangements

Design of access roads shall enable safe access and egress for residents attempting to leave the area at the same time that emergency service personnel are arriving to undertake firefighting operations.

Chapters 5-8 detail performance criteria and acceptable solutions for access arrangements, relevant to the development type. Specific access design principles are included in Appendix 3.

In a bush fire prone area, the purpose of the road system is to:

- provide firefighters with access to structures, allowing more efficient use of firefighting resources;
- provide evacuation routes for firefighters and the public; and
- provide access to areas of bush fire hazard for firefighting and hazard mitigation purposes.

Roads shall provide sufficient width and other dimensions to ensure safe unobstructed access and allow firefighting crews to operate equipment around the vehicle. Road width is defined as the trafficable width from kerb to kerb or the inside edge of the table drain.

Holleys Rd.
Dead-end roads should be avoided. However, where they are present, they must incorporate a sufficient turn-around area to minimise the need for vehicles to make multipoint turns.

3.4.1 Perimeter roads

A perimeter road should be provided to separate bush land from urban areas, allowing more efficient use of firefighting resources. A perimeter road is located on the outer extremity of a local area or subdivision and usually runs parallel to the bush land interface.

The perimeter road provides space to conduct active firefighting operations and hazard reduction activities. In developments where no perimeter road exists, property defence in a bush fire event may be more difficult.

3.4.2 Non-perimeter roads

Non-perimeter roads are the interconnecting roads between the perimeter roads and the existing and/or broader road network. These roads form a link for firefighting operations by providing access for emergency vehicles, a safe space for conducting property protection, and a suitable road network for egress of residents.

3.4.3 Property access roads

Property access is any access from private land onto the public road system. In rural areas, in particular isolated rural properties, operational difficulties can be experienced in accessing buildings. Examples include water crossings and roads which may be cut off by fire or other hazardous conditions. As a result, the location and standards of property access roads should be carefully considered.

3.4.4 Fire trails

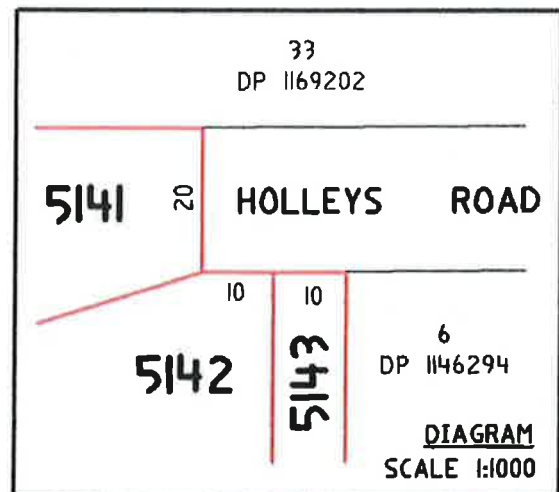
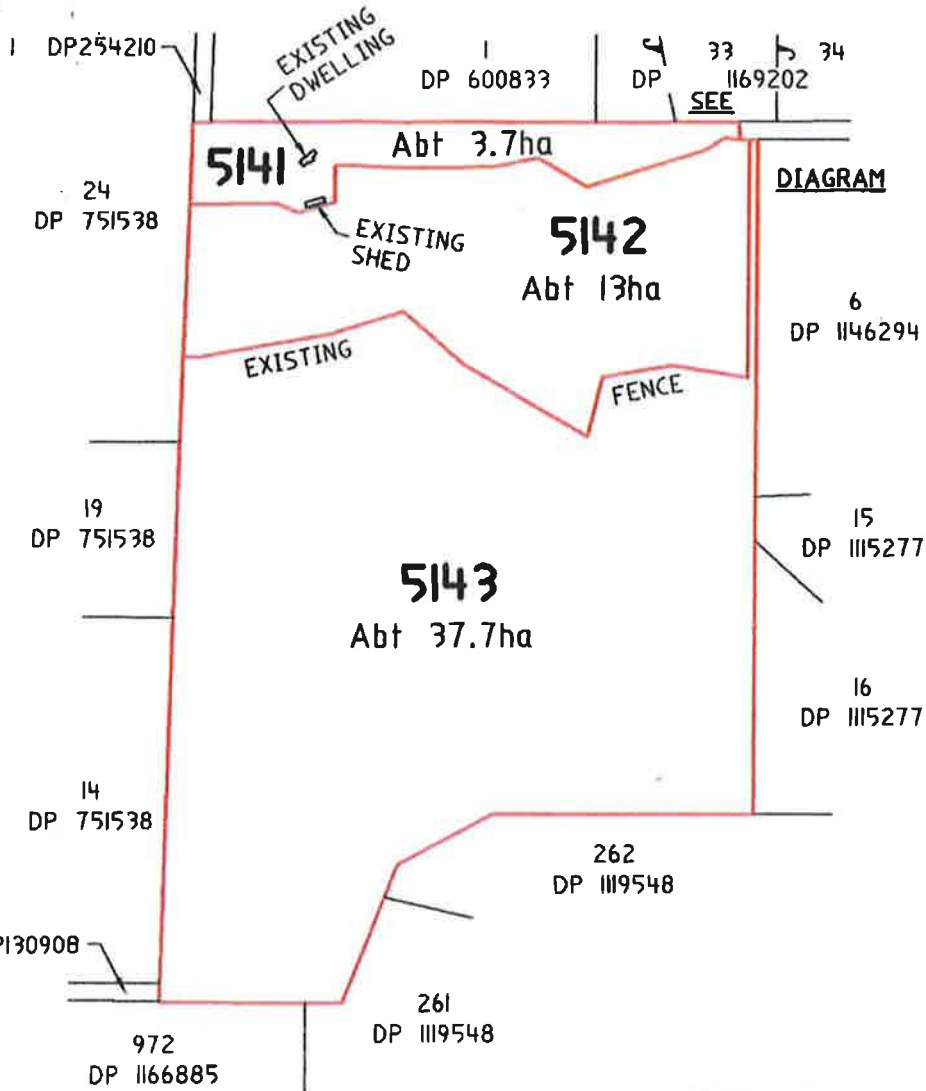
Fire trails are used as access for firefighters in operational situations, as fire containment lines and for APZ maintenance.

Fire trails are not required for compliance with PBP. A fire trail is not a substitute for a road, nor is it considered an appropriate trade-off for the provision of perimeter, non-perimeter or property road access requirements.

The RF Act pt.3B provides for the establishment, maintenance, protection, certification and registration of fire trails by the NSW RFS Commissioner outside of the DA process.

Holleys
[Handwritten mark]
p29

M.M



TENTERFIELD SURVEYS

342 Rouse Street (P.O Box 549)
 Tenterfield, NSW 2372
 Phone: (02) 6736 2655
 Fax: (02) 6736 2611
 Web: www.tenterfieldsurveys.com.au



J & L HOLLEY
PROPOSED BOUNDARY ADJUSTMENT
BETWEEN LOTS 514 & 523 IN
DP751540 AND LOT 1 IN DP253093
- HOLLEYS ROAD, TENTERFIELD -
 Parish: TENTERFIELD, County: CLIVE

SCALE:
 LGA:
 LOCALITY:
 SURVEYED:
 DRAWN:
 DATE:
 COGO:
 Dwg. No.

1 : 9000 @ A4
 TENTERFIELD
 TENTERFIELD
 C.D
 20/04/2015
 TE150194.ccx
 TE150194-SV1

[REDACTED]

Your Ref IN20/3250CCCCF
Development Application no 2020.069
Primitive Camping Ground
Lot 6, DP 1146294, 57 Holleys Road, Tenterfield.

Manager of Planning & Development Services
Ms Tamai Davidson
Dear Madam,

We refer to the above Development Application.

We have no objection to the above application but wish to draw Council's attention and the Applicant's attention to the following points, for consideration:

1. ELECTRIC FENCING

The applicant's property, 57 Holleys Rd, is fenced with an electric fence on the western boundary of their property, between their property and our property Yoorooga. This is to prevent town dogs from attacking our stud sheep.

We have signs on the fence but how does the applicant intend to warn campers of this danger?

2. HOLLEYS ROAD (Council Road)

Holleys Road would NOT be in suitable condition for the use of up to two thousand tourists each year, in its present state.

Is council going to upgrade the present road? It would need to be rebitumened and new signage, perhaps speed signs put in place to consider present residents along the road.

At present it is riddled with large pot holes and during heavy downpours it becomes untrafficable, as the present pipes can't take the amount of water flowing down the gutters.

Part of the applicant's permission may require a contribution to upgrade the road. This was required of us twice by council in the past.

3. DOGS

Are dogs accompanying guests? As this property borders an established merino stud, what is the applicant's position regarding dogs. If dogs are welcomed with campers, what steps will be taken to prevent dogs attacking the stud sheep on our property? Sheep would be worth at least four hundred dollars each, so we would not like to see their guests getting involved in this sort of trouble.

4. ACCESS ROAD ALONG WESTERN BOUNDARY of 57 Holleys Rd

Is the applicant aware that a new internal access road (already surveyed) is planned for our property (providing access to our back blocks)?

The road will run adjacent to the western boundary of 57 Holleys Road, from 63 Holleys Rd all the way along our shared fence line. The entrance and gate for this road is already in place - 63 Holleys Rd.

This could be a problem for the proposed bubble tents (Campsite 2 and Campsite 3 on their plans) to have a road so close. To have traffic passing these present sites would not be good regarding dust in dry times and could present privacy problems for campers and neighbours.

5. FARMING ACTIVITIES/NOISE

Is the applicant aware that farming and cultivation takes place on their boundary near the western and southern end each year? Sheep are held to lamb in these paddocks, so livestock noise will be evident at night particularly.

We have met the applicant Mrs Cathryn van der Wait and would be happy to discuss any features arising from the above. The idea being to solving any problems now, so that we experience no problems in the future.

Thank you,





14th September 2020

CURRENT OWNERS AND PREVIOUS RESIDENTS OF

49 Holley's Road,

Tenterfield

Chief Executive

Tenterfield Shire Council

Box 214

Tenterfield 2372

Your Ref IN20/3250CCCF

Submission with Objections to Tenterfield Shire Council re;

Development Application No:2020.069 Primitive Camping Ground

Lot 6, DP 1146294; 57 Holley's Road Tenterfield

Dear Chief Executive,

We wish to address some **major objections** to the Development Application, specifically the location of the Primitive Camping Ground so close to our property and **extra bush fire danger it brings in such proximity to our existing dwelling at 49 Holley's Road**. This commercial development of a primitive camping ground is not in any way isolated from the many homes and families that live along Holley's Road.

Our house and property at 49 Holley's Road borders 57 Holley's Road **along two boundaries** where the development of the Primitive Camping Ground is proposed. At present our house is rented. Due to the proposed location we have some major concerns for our property and tenants.

The seeming lack of any onsite manager raises serious concerns over the effectiveness of any rules and regulations imposed by the operator. **In particular adherence to speed limits, restrictions on vehicle use, excessive noise and dust and most importantly adherence to fire safety regulations.**

Fire danger

It seems to us that the Applicant of DA no 2020.069 **does not place a high enough regard to the Fire Risk that exists for Holley's Rd residents, campers, or animals.**

Having lived on Holley's Road for 25 years we have seen **how easily and quickly fire can spread and have always practiced extreme caution when lighting and extinguishing fires.** Landowners on Holley's Road have a strong sense of community responsibility when using fire and **would never light a fire unnecessarily** or use fire to back burn without following RFS procedure, **obtaining permits and alerting neighbours first.** **Our house and land are directly in the way of any fires that may occur.** Both JE & LA Holley and J D McCormack & J G McLaren have addressed many fire concerns in depth in their submission of objections and we concur with and support their concerns.

There is a distinct lack of information in the application, but having researched Bubble Tent Australia at Capertee <https://bubbletentaustralia.com/>, we have discovered, as outlined below, that guests at this camp ground **may cook on and light outside fires** and although smoking is banned, water for the outside baths are heated using a **chip heater.**

Reviews from Bubbletent Australia demonstrate the romanticising of lighting/having a fire some glampers have when holidaying at these camp sites.

'love to roast marshmallows on campfire'

'We lit a beautiful fire and sat under the stars'

'The wood fired bath is such a great addition'

'The bath works on fire convection so takes time to stoke up and get the heat going'

'the fire pit is everything you need to keep warm and enjoy the glamping campfire experience'

'We had perfect weather so stayed outside for the most part - why wouldn't you with a roaring fire going!'

We have strong objections to a potential four or more open fires being lit on a regular basis so close to our property and the neighbouring properties by strangers with no emotional or financial investment in the threat of fire to their homes and families.

Would any members of the council be happy with so many open fires being lit by tourists so near to their homes?!

How can the nominated Fire Warden ensure all fires are doused effectively at night and know how to control a fire that spreads, the simple answer is they can't. The nominated fire warden is an individual within each group of campers, with no training, no investment in the safety of the property and the properties of neighbours and quite possibly little understanding of the behaviour of grass fires.

Additionally, without accessible running water at the sites, how are any potential tent or grass fires even to be controlled?

Noise, Privacy and Drinking water

The access road to Campsite 1 on 57 Holley's Road is unsealed and runs along the boundary of our tenant's house yard. **We have great concerns that this will not only be an invasion of their privacy, but also create huge amounts of dust and pollutants that will drift onto the roof of 49 Holley's road dwelling and contaminate the drinking water.** This will also add to the pollution of washing drying on the line and cleaning of gutters, windows and inside their home. Campsite 1 is especially close to our tenant's home, a home they have rented from us to ensure peace and quiet for them to raise their family.

The potential for noise from campers late into the night is of great concern, who is there to maintain any restrictions on that? In other commercial enterprises such as caravan parks and motels there is a 10pm noise restriction, how is this to be policed at the campground?

Dam capture and Safety

The road for access to Campsite 1 will need a curb and channel which will divert the overland flow away from our dam. This dam is the **only water source for stock on our property** as well as being the sole provider of water for our **firefighting tank for our house.** We believe the dam also presents a water safety issue for the users of the camping ground. The fencing is not adequate to ensure children cannot enter our property and gain access to the dam.

The dam is essential to supply water to our fire fighting tank for the house.

Road Safety, Upgrade and Maintenance

Having lived at 49 Holley's Road with our children for 6 years we were always very conscious of their safety on the road. Many people drive up Holley's Road extremely quickly and pay no heed to speed limits. With the addition of 2000 visitors we fear for the safety of our tenants, whose children ride their bikes down Holley's Road each day to catch the bus. The school bus parks across the driveway of Holley's Road and waits for the children, in the afternoon they are dropped off and they walk home. **We believe that major road works are necessary where Holley's Road meets the Mt Mackenzie Road to protect the children each day as they get off the bus, not to mention the obvious increase of thousands of cars a year will necessitate a major upgrade of Holley's Road.**

It is understood that an engineer's assessment would need to be completed to ensure the road is constructed to deal with the additional traffic. Continued maintenance by the Tenterfield Shire Council would also need to be increased to ensure the safety of the road. The drainage is not adequate to deal with rain and to facilitate effective drainage more tree removal would be necessary. This animal corridor is a beautiful line of old trees that under no circumstances should be removed because of their beauty and provision of a **wildlife corridor for native animals travelling from Curry's Gap Nature Reserve, 'home to a number of vulnerable animal species' (Tenterfield Shire Council, 2020)** to the bushland behind Holley's Road and Christopher Watt's property.

Parking for Campground

It appears that the proximity to our southern boundary with the associated Bubble Campsite 1 car park is less than the regulated 40 metres. We argue that it should be the 100 metres that applies to other agricultural enterprises, as per your guidelines in council documents.

Native animals

Having lived at 49 Holley's Road and owned 57 Holley's Road from 2010-2016 we saw many native animals that may **become displaced or hazardous to campers** due to the proposed 2000 visitors expected within the campground. There are Tawny Frog Mouth Owls that nest along Holley's Road every year, many Brown and Red Bellied Black snakes that live and breed in the rocky outcrop and Echidnas that forage for ants along the side of the road. More importantly on numerous occasions we saw **Spotted Quolls (an endangered population)** most likely travelling from Curry's Gap Nature Reserve living on or near the rocky outcrop near Campsite 1.

We have read through JE & LA Holley and J D McCormack & J G McLaren submissions to council and would like to state that we support and agree with their objections also. There is too much potential for endangerment and displacement of people, property and animals for this proposal to go ahead in its current form.

Regards

Tenterfield

TENTERFIELD SHIRE COUNCIL		
15 SEP 2020		
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CI		
CCO		
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T.D	✓	

SCANNED

Tenterfield NSW 2372
10th Sept 2020

Submission with Objections to Tenterfield Shire Council re;
Development Application No:2020.069 Primitive Camping Ground
Lot 6, DP 1146294; 57 Holley's Road Tenterfield

To the Chief Executive,

The above Development Application has recently come to our attention by neighbors, yet to date we have not received any notification from Council. We would question if this is normal procedure, *(given we live on Holley's Rd just a few doors down from the property in question)* not to notify residents in such close proximity and when application has been made to council for an Accommodation Camping Ground, surely this being a **commercial venture** it would require a change of usage to conduct such a business and a DA sign to be erected on Holley's Road for any objections?

We would also question, is it within correct council guidelines to approve such a commercial development in the midst of rural residential sub-division??

Those who have made their home here have been attracted to this small subdivision specifically for the quiet rural retreat to retire to and/or have their hobby farm, thinking a 'no through' country lane would be safe from commercial developments and all that brings by our front door, most notably a LARGE increase in traffic, potential of increased fire danger, contributed addition of dust as well as potential of excess noise and disturbance from possible unruly holiday makers.

With that in mind and as residents of Holley's Road we take this opportunity to express and SUBMIT OUR OBJECTIONS:

Firstly, we would like to make reference to the submission by JE & LA Holley, 7th September 2020, barring their personal 'side of the fence' issues, we agree and wish to stand with them on their excellent points of objection, much of which is from long term background knowledge and experience of this area, as our much valued generational Farmers could only know firsthand eg: threatening weather patterns, fire threats, habitats of protected/endangered species as well as dangerous wildlife such as poisonous snakes.

Also in regards to the subject of Fire threat, we acknowledge the Holley's submission which covers this subject very well with back up references to Rural Fire Services information.

OBJECTION TO THE ADDED FIRE THREAT ISSUE

Has the applicant acquired the 'required issue of a Bushfire Safety Authority from the NSW Rural Fire Service' as stated in the following Quote from Tenterfield Councils;

Guide for Primitive Camping Grounds

Quote: Pursuant to the provisions of Tenterfield Local Environmental Plan 2013 the development is defined as; etc

Quote: The DA component is the planning approval for the development and considers such matters, including, but not limited to; traffic, **bushfire**, waste management, environmental impact and noise.

- **Bushfire Assessment** – if the land is mapped as Bushfire Prone on Council's Bushfire Prone Land Maps, the proposal is classified as 'integrated development' requiring the issue of a Bushfire Safety Authority from the NSW Rural Fire Service. The RFS website has information in relation to this form of development, which is referred to as a 'special fire protection purpose' under Section 4.2; <http://www.rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area/types-ofdevelopment/special-fire-protection-purpose-vulnerable-members-of-the-community>

The fire threat issue has been very well covered by Mr & Mrs Holley's submission to which we would draw your attention. **To their list of facts covered** we will just add our personal reflection as residents having been through two severe fires in short succession last year and John McCormack being a Fireman with Fire & Rescue.

The first fire that started around the corner from us last September, that went across the south of town and as the Holley's pointed out: "*started with one match*", also burnt backwards toward Curry's Gap for several days on the borders of properties just across Mt McKenzie Road, for those days we saw fire burning not far across the road from us, not a reassuring sight as a turn of wind could have been disaster all over again.

Then a month later, the fire that raged over the hill at the end of Holley's Road was extremely frightening. While John being a fireman, was protecting property on the hill, Jen was bracing to defend our property on her own. We would like to state, ***unless you've been through the fear of it close at hand, you cannot imagine what it is like.***

We strongly object to a regular influx of unwary tourists camping nearby on designated Fire Prone land, this is a great cause of concern to us.

Slashing Love Grass annually does not extinguish the threat of runaway fire. Love grass will burn from stubs down into the ground and remain a smoldering threat for days. The local Fire and Rescue team of which John McCormack is a fireman, were called repeatedly to fires last season that flared up several times from slow burning root systems of love grass, of which the only way to extinguish beyond threat in the long run was to spray fire-retardant foam. Love grass proves to create a new kind of very hot, persistent fire into the ground as a result of its silica content.

We draw attention to the website of www.bubbletentaustralia.com

Bubbletent Australia's website shows their other Primitive Camping Ground situated in the Capertee Valley area NSW depicting many photographs, some of these showing an open fire pit and a 'woodfired bathtub' heated by fire pit beneath the tub with a fire flue/chimney. This is a great source of concern, any form of 'open' fire is a huge danger in this area of designated Fire Prone Land, we would question if it is even **legal in Fire Season?**

As the development application is for a Primitive Camping Ground, will campfires, fire pits, and fire heated bathtubs or any form of naked flames be allowed at this camp ground?

Many fires are ignited from airborne embers, campfires are often a source of creating this phenomenon and a dirt road will not 'break' their flight. **That flight direction with the prevailing winds from the designated site is generally westerly/north westerly direction heading easterly straight over homes on Holley's Road and on to Tenterfield township.**

As far as an internal road creating a firebreak around the property, on a number of occasions that Fire and Rescue were called to in the last year, many of them jumped not just a dirt road, but bitumen roads and the New England Highway included.

Also, where is the water supply coming from to deal with the possible event of a fire started from a campfire and/or other human error, and will any public liability insurance cover the cost? The question is, in the event of a fire being started at the camp ground, where does the onus fall on Council should they approve such a development in the first place, in a such a high risk area?

It took numerous water tankers, firetrucks, helicopters and a 737 Water bombing plane, not to mention dozens of firefighters to stop the fire coming down to Holley's Road residents and potentially across town last October, and that went on for days. It's not far to town from here 'as the crow flies'!

We would question the common sense and legality of a **Primitive Camping Ground** on designated Fire Prone land. Such an enterprise would be putting local residents along with unsuspecting holiday makers at high risk in more ways than one, many of these tourists as the Application states are likely to be overseas visitors, far beyond knowledge of the volatility of our Aussie bush, not to mention Aussies who haven't a clue either. And then there are the ones that just don't care: "I'm on holiday, I'm paying for this, I can have a camp fire if I want!"

Who will be permanently on site 24/7 to oversee and enforce rules and how can they be enforced??

As a final note on the Fire issue, we bring your attention to Councils latest News Letter 7 September;

Under Article: **NSW RURAL FIRE SERVICE GET READY WEEKEND**

Quote: *"This year we've seen an unparalleled number of events impacting large areas of NSW happen in quick succession, highlighting the importance of being prepared for all hazards."*

The timing and insensitivity of the Primitive Camping Ground proposal appears to be counter to the concerns of not only Tenterfield Council, but other Councils and Authorities across NSW and Australia, and a slap in the face to those who endured the horrors of the mass fires across Australia in this last year. Surely it should be understood we residents may feel rather 'on edge' re; this development proposal?

THE TRAFFIC ISSUE

Again, we bring your attention to Councils;

Guide for Primitive Camping Grounds

Pursuant to the provisions of Tenterfield Local Environmental Plan 2013 the development is defined as; etc

Quote: The DA component is the planning approval for the development and considers such matters, including, but not limited to; **traffic**, bushfire, waste management, environmental impact and noise.

- It is also likely that any existing access point from Council's road network will require upgrading in order to meet Council's current standards contained in the . Details of any works required will be the subject of a Section 138 Permit application made to Council and a subsequent approval issued.

Will there be sufficient upgrading to ensure road safety to Holley's Road and Mt McKenzie Road drivers, cyclists, walkers, joggers, horse/riders, school children?

Holley's Road is certainly not suitable for a large increase in traffic as the application indicates a potential 2,000 people per year, whilst this may equate to 1,000 vehicles, the number of trips in and out as the holiday makers visit tourist attractions, shops, florists, including night time trips to and from venues/restaurants, **would considerably boost actual traffic numbers on the road exponentially.**

There must be consideration of the width and poor state of the road, even given that council workers came and filled pot holes just yesterday, the loose gravel from filling potholes just adds another threat.

Not to mention that the road went under water from the culvert just outside our driveway in a flash just last year in the midst of a large hail storm and left slippery mud on the road in its wake.

We ourselves have very poor visibility both left and right while driving out our own driveway because of the long growth on the verges in front of our property. We have attempted at times to trim some but the tall tough grasses, brambles, uneven terrain, culvert and rocks make it impossible to clear much with our modest equipment.

We also bring your attention to the corner entrance turning from Holley's Road onto Mt McKenzie Road, this has the same poor visibility from the state of the verge and with traffic travelling at 80km would most certainly pose a threat to all traffic.

The most potentially dangerous issue is;

turning into Holley's Road from Mt McKenzie Road, with a **90 degree bend a few metres back** and the 80km speed of traffic on Mt McKenzie Road, with **NO proper turning lane**, there is nowhere for unsuspecting drivers rounding the bend to go, other than a patch of loose gravel, should they encounter 3 or 4 vehicles lined up while one is waiting to make a right turn. Is there a Traffic Authority ruling on such a potentially dangerous turning across a busy road???

Not just domestic vehicles frequent this road but so do tourist RVs going to Mt McKenzie lookout, cattle trucks, log trucks, dump trucks, earth moving machinery on trucks, water trucks, Council rubbish trucks, tractors, cyclists, joggers, walkers, school children, horses/riders and kangaroos!

Some tourists not being familiar with an area generally drive slower whereas residents that drive the road daily and wanting to get home, drive at the top of the speed limit, and some even use it as a 'drag strip'. All in all, this is a serious recipe for disaster for residents and tourist alike, not to mention rare breed livestock that might be grazing near fence lines, ours included.

Who will be held accountable in the event of a traffic disaster on the corner, the driver or the authority responsible for the state of the road?

We confirmed with the Developer Howard Hall, that he paid in the vicinity of \$60,000.00 to Tenterfield Council in road upgrade, which was paid for access for the handful of new residents, not to provide for commercial ventures.

We strongly object to a greater influx of tourist driven traffic on the grounds that the previous upgrade is NOT sufficient to safely carry such extra influx of traffic.

THE DUST ISSUE

We draw attention to a statement in the Development Application under the heading of;
ENVIRONMENTAL IMPACTS

Quote: *"During dry periods, any dust disturbed on the internal access road will not impact neighbors or watercourses."*

This is a very broad statement with nothing to back it up as to how and why there will be no impact!!

How can such a statement be made and stand up when the person making the statement has not lived here and experienced such things as the strength and direction of prevailing winds and any accompanying dust?

We also draw attention to the Application heading:

SITE DESCRIPTION AND ANALYSIS

Location and Property Description Satellite Map (Figure 1)

As is shown on the map, the border line of the property in question is a large battle axe block, of which the proposed 'access road' circles completely. That equates to quite a lot of road as it loops back on itself and situated just behind the residential homes on Holley's Road.

Will the intended loop road on the property be sealed in order to limit extra excess dust?

This can be a very windy area at any time of the year with the worst of the windy period being late winter and spring and again in summer, with the prevailing winds being largely westerly to north/westerly. That direction blows straight over the area in question and generally directly in

line with the residents on Holley's Road as well as Tenterfield township, indeed, the fire of September 2019 was driven by this direction of prevailing winds, and also brought them to our doorstep a month later.

These residential homes rely completely on rooftop collection of water as their sole domestic water supply, and as well some of we residents have off grid solar power with rooftop solar panels that provide our sole power supply.

Dust on the roof puts excess unhealthy sludge in the tank water, our drinking water, and dust on the solar panels decreases the power generating efficiency. This is an ongoing issue already without compromising it with additional dust sources.

The camp ground operating on a 24/7 hourly basis (as stated in the application), allows for continual traffic, and driving at 5km per hr does **NOTHING** to stop clouds of dust, as we can attest to, and just the westerly drift will deposit that on rooftops anyway. However, when boosted by prevailing westerly-north/westerly winds it doesn't even need a vehicle to disturb it, the winds do that all on their own and, with the resulting airborne dust also playing havoc with our health and wellbeing (lungs, sinuses, eyes etc) as we have already experienced personally.

We strongly object to any added dust potential. The proposed loop road just behind our properties, if unsealed, will have a DEFINITE IMPACT on roof top rainwater and solar collection and the residents' health and wellbeing.

CONSTRUCTION WORK ALREADY IN PROGRESS!

Once again, we bring your attention to Councils;

Guide for Primitive Camping Grounds

Pursuant to the provisions of Tenterfield Local Environmental Plan 2013 the development is defined as; etc

- **Prior to undertaking any works** in association with establishing a camping ground, it is necessary to obtain the required development consent and construction certificate from Council by way of lodging a Development Application (DA) and Construction Certificate (CC) for assessment.

In reference to the above guideline, we draw your attention to the fact that construction has been underway for some time now. Heavy machinery, dump trucks, workers vehicles have been frequenting Holley's Road for a considerable time to date. At least one of the timber decks has been constructed.

Referring to Councils Guideline, it clearly states that *"development consent and construction certificate must be obtained **PRIOR** to undertaking any works."*

The DA has not been approved, it is still open to objection, no consent could have been given.

What is Councils course of action to this?

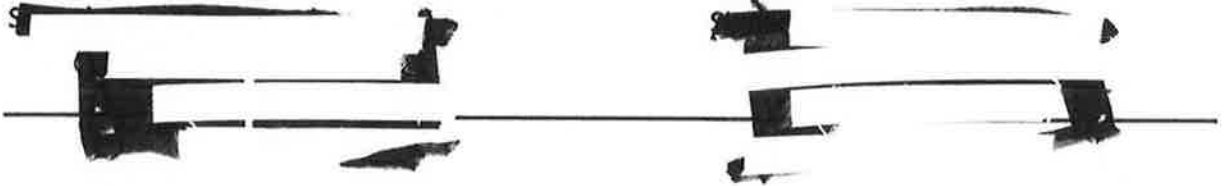
OUR FINAL STATEMENT OF OBJECTION

Holley's Road is but a short country lane providing access to a small rural residential subdivision and farms (Holley's and Watts). The quality of the road condition is totally inadequate to carry a greater influx of traffic and the access corner would be dangerous with higher traffic levels. School children use this road twice a day to catch the school bus on the corner as well.

We strongly object to the said 'commercial accommodation business', this will certainly impact the safety of the residents of Holley's Road (and also Mt McKenzie Road), and also disrupt the quieter life we and our fellow residents sought to retire to.

Who will be permanently on site to OVERSEE AND ENFORCE rules such as traffic speed, fire lighting, over imbibing of alcohol and subsequent unruly behavior, excess noise and/or loud music etc???

The Residents' safety, health and lifestyle MUST be considered and respected!





Tenterfield 2372
7th September 2020

Chief Executive
Tenterfield Shire Council
Box 214
Tenterfield 2372

Your Ref IN20/3250CCCCF
Our Ref: DA No 2020.069 Primitive Camping Ground

TENTERFIELD SHIRE COUNCIL		
11 SEP 2020		
	Action	Info
CL		
CCO		
COO		
T-D	✓	

E-MAILED
Date 10/9/20 By

Dear Chief Executive,

We wish to address further our Major Objection to the Development Application, specifically the Location of the Primitive Camping Ground on Bush Fire Prone Land and the extra Bush Fire Danger it brings in such close proximity to existing dwellings and farm land on Holleys Rd.

We have been able to achieve further insight into the DA No 2020.069, through careful reading of the NSW Rural Fire Service Document, Planning For Bush Fire Protection, November 2019, cited in our previous submission. Now referred to in this submission as **RFS Document. We have increased concerns, to be addressed below.**

We have spoken to Mr Scott Keelan, Rural Fire Service, Northern Tablelands, expressing our concerns. He told us he will alert RFS Management in relation to the location and Bush Fire situation of the Primitive Camping Ground. We await an imminent response from the RFS in this regard.

We are trying to arrange for an external expert to report on the fire danger of this project and an expert to express an opinion on the social effect on residents and farming if this project goes ahead. This we will pay for ourselves and present to Council, as it will be a starting point if something horrible, such as a death by fire of one of our residents or the welfare of animals raises its ugly head in the future, resulting from the Applicant or some of their two thousand guests a year, being negligent.

- The gist of the RFS document is expressly warning all consenting authorities of their 'Duty of Care' to all persons, both existing residents, guests of the proposed development, and emergency personnel themselves who risk their lives to fight each time.
- There is nothing that can be done about past development consents, but great care should be taken, after the 2019 Bushfire Emergencies, with any Council Development Consent that could or would put firefighters, residents, tourists (campers) and animals at risk at any time.

- The specific type of Development proposed, an **SFFP** (a Primitive Camping Ground) is one 'which is occupied by people who are considered to be at-risk members of the community. In a bush fire event, these occupants may be more susceptible to the impacts of bushfire' p 49 RFS Document
 - They may be less aware of the dangers and impacts of bushfire,
 - They may not be able to evaluate the risks and respond appropriately
 - They may have communication barriers (language)
 - They may be unfamiliar with the area.

The Current DA proposal states one camper at each site will be the nominated fire warden.

If any or all of the above apply this is a recipe for bushfire disaster in the area.

- We believe that the Applicant of DA no 2020.069 **has not** taken any **Duty of Care** in regard to **Fire Risk** to existing Holleys Rd residents, campers or animals in the vicinity of Holleys Rd.
 - They have only provided information on **Bushfire Emergency Management and Evacuation**- the responsibility for evacuation falling onto the shoulders of the inexperienced campers in an emergency. To pass the risk of fire control and evacuation, to their guest to act as" fire wardens" who may not speak english or are unaware of the risk they face is entirely unacceptable. (ie Overseas visitors, city people who are the people who are going to come)
 - The risk rests with the Applicant and Council. They need to identify the risk and present a workable on ground solution.
 - A **full time paid onsite caretaker** seems one step to accepting this responsibility.
 - Existing Holleys Rd residents don't want or need the risk of an Emergency or Evacuation to be increased on our doorstep!
 - Our Bushfire experience in Holleys Rd in 2019 was horrifying, to be attested to by local RFS, Fire and Service and Police personnel in Tenterfield. Not to mention the residents themselves.
 - Holleys Rd was **closed by Police** in the emergency- an added concern to be addressed under **Access and Egress**.

Operational Access and Egress during bushfire emergencies, relating to the condition of Holleys Road and the entrance to the proposed Primitive Camping Ground at 57 Holleys Rd.

Road dimensions, specifications, locations, are addressed in detail in the RFS Document 2019, pp57 to 58, pp 100 to 105, specifically in relation to SFFP Developments, 'to provide safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area.' p 57

Holleys Rd condition and dimensions must be investigated fully in this regard, to ensure it meets the RFS requirements. This is most unlikely, as it is a narrow, one lane, no through road, with no passing provision and deep gutters being a trap for unfamiliar vehicles in emergencies.

To upgrade to meet requirements will cost Council, or the Applicant , suggest at least \$50,000 to \$80,000. Probably more.

'Dead end roads should be avoided' p 29 RFS Document

'Location and standards of property access roads should be carefully considered' p 29
RFS Document

What turnaround is available at the end of the No Through Road, Holleys Rd, is too limited to meet the needs of multiple emergency services vehicles during fires. During the last emergencies residents also parked their cars in this turnaround area to enable escape and protection from fires.

(Personal Aspect from our experience, for Council to note)

During the terrible fires last year, we experienced fires to our house twice, with fire fighters, police, planes and helicopters for periods of two weeks fighting fires that came and then flared again day after day.

The Mt MacKenzie Road was closed for days, Holley's Road shut for two days due to fire all along the road and fallen trees cutting the road. Several residents fled to town to the rescue centre and we were not allowed home for two days. The roadblocks were set up by the Police, with an officer on entry to the roads

Does Council consider the **psychological pain** that residents may suffer if this D.A. is approved, in regard to the added bushfire danger, so close to their dwellings, created by the development? Mentioned in the RFS Document.

The type of fire experience have been unheard for generations in our community and Council should consider in their deliberations the effect of **CLIMATE CHANGE**. We notice that many councils are now factoring this effect into their decisions on D.A.'s

Does the Tenterfield Council consider climate change is a risk factor in this D.A.? The development is very close to numerous existing dwellings and the increasing level of more severe fires due to climate change as demonstrated last year, should be considered.

In the D.A. the applicant did not address all the **major fire risks** that the proposed site presents. (Which is understandable, as they don't want to mention aspects that work against them, although we think this was unwise).

It is an urban rural residential area with many residents living close to the selected site. The Planning For Bushfires Document states clearly that Primitive Camping 'is generally more remote from urban areas' and should be located away from high risk and bush fire prone areas '**during periods of elevated bush fire danger**' (p 51 RFS Document) Consequently there will be obvious issues for camping arrangements throughout the year in the present proposed location!

What would happen if Council approves the D.A. and the carelessness of one of the Primitive Camping guests (smoking, lighting a camp fire or boiling water for a bath) results in a quick, highly dangerous grass fire driven by a strong westerly wind in August burning to death one of our elderly residents on the road or burns hundreds of sheep that have to

be destroyed by the Local Lands Board ? It's not only the grass on the proposed Camping Ground, the site is surrounded by tall grass on other blocks and along the road. What control does the applicant have over these other blocks? (It may be worth council visiting the area and looking at the problem)

We were involved in a very similar D.A. Council approval in the Armidale region some years ago.

This was "The Martin Street Subdivision " where Armidale Council approved a D.A. lacking a duty of care to the people who built houses on the subdivision. (One being us)

After legal action, Council insurers payed out millions to compensate people who built on the subdivision and the case, " Council versus the People" became a teaching case in law schools in Australia.

We would not like to see such a thing happen in Tenterfield.
It would be a very sad outcome for our community and those involved.

A Final note, has this been carried out?

'A bush fire safety authority (BFSA) is required from the NSW RFS for residential and rural residential subdivision and **SFPP developments on BFPL'** p 18 RFS Document.

Thank you





Tenterfield 2372
13th September 2020

Chief Executive
Tenterfield Shire Council
Box 214
Tenterfield 2372

Your Ref IN20/3250CCCCF
Our Ref: DA No 2020.069 Primitive Camping Ground

TENTERFIELD SHIRE COUNCIL		
15 SEP 2020		
	Action	Info
CL		
CCO		
COO		
T-D	✓	

E-MAILED
Date 14/9/20 By

This forms PART THREE of our Submission and Objection to the D.A. No 2020.069

We would like to raise the following Objections to the DA, addressing lack of information and detail presented in the DA, with reference to the following two Council Documents, located on Tenterfield Shire Council's Building and Planning section of their website.

Document One

- * **GUIDE FOR PRIMITIVE CAMPING GROUNDS** (Tenterfield Local Environment Plan 2013)

Document Two

- * **DEVELOPMENT CONTROL PLAN 2014 Tenterfield Shire Council**

We were unable to include these Objections in our original two Submissions and Objections (see e-mails sent to Council on 7th Sept 2020 and 10th Sept 2020 from the undersigned), as we had to read and locate the Council Documents and information on Tenterfield Council and NSW Government web sites. This has taken us a significant amount of time.

We wish to submit our Objection to the Proposal on the grounds that the Details listed below have not been addressed or provided by the Applicant in DA 2020.069 Primitive Camping Ground.

OBJECTIONS on LACK OF RELEVANT DETAIL in THE DA on issues ARISING FROM your Document

GUIDE FOR PRIMITIVE CAMPING GROUNDS (Tenterfield Local Environment Plan 2013)

1. **No detail is provided in the DA on types of vehicles welcomed to or permitted on the Campground.** (only no motorbikes). **A major concern with potential impact on noise, environment, roads.**

One would logically assume, that RVs, Campervans and Caravans as well as four wheel drives will make up the extra vehicles using Holleys Rd. This is what tourist travel in.

These vehicles will add people on site, who may not ALL be using the Bubletent facilities.

These RVs, campervans, caravans are well set up to **use their own toileting and bathing facilities**, not those provided for Buble tents.

Will they all **dispose of effluent** responsibly in town facilities, or just 'in the bush' flowing into Curry's Creek?

This is a concern for **environmental impact re on-site sewage management - impacting Currys Creek and Tenterfield township.**

And **how many times** will these visiting vehicles travel in and out daily on Holley's Rd, in order to visit town for refreshments, or supplies, or visit Tenterfield tourist attractions?

Holleys Rd is a narrow, poorly surfaced and poorly maintained one way, no through road, serving its **current residents who are aware of its condition and travel it with caution at all times.**

The above details have not been addressed in the DA. How will they impact noise, the environment, raising of dust, the condition of Holley's Rd? (p 1 Guide for Primitive Camping Grounds)

Can this issue be monitored and controlled by the Applicant. How ? No detail is provided.

2. **Noise impact is not addressed in any detail in the DA.** (p 1 of Guide for Primitive Camping Grounds) **This is a major concern to close neighbours.**

A Superficial statement is provided in the DA, 'house rules will ensure noise levels are kept to a minimum at all times'. (DA) Very easy to say. What are the house rules? Who will enforce them? We would think that further evidence (say a noise expert report) is required

What impact will the noise of camping guests, (two thousand a year) have on the social and emotional welfare of neighbours, besides saying there will be no noise impact?

As outlined above, there is obvious potential for **extra campers** in RVs, Campervans, bringing with them loud music, campfire concerts, other types of group entertainment.

The Campground is advertised as 24/7, so camping noise has the potential to impact on neighbours throughout the night. And some neighbours are very close!

If there are **house rules** they have not been detailed. Who will monitor them?

Council's Guide clearly states that **noise impact** needs to be addressed, (p 1 Guide for Primitive Camping) especially since it is a large development, an increase of two thousand people a year on one small area.

Also no **alcohol guidelines** are given in the D.A. which is a further concern in regard to the noise impact. Are there guidelines for noise levels, at night time,? This is particularly a concern for residents in dwellings close to Buble tent Site One - 49 Holleys Rd (C and S Pryce) and 35 Holleys Rd (G Faulkner), as well as ourselves 63A Holleys Rd (J and L Holley))
Noise drifts at night when all else is quiet!

3. **No detail that a Bushfire Safety Authority from the NSW RFS has been lodged with this DA.**

Bushfire Assessment, as outlined on p 2 of Council's Guide for Primitive Camping, states that land mapped as Bushfire Prone Land requires the issue of a Bushfire Safety Authority from the NSW Rural Fire Service. The location of the DA, **57 Holleys Rd**, is marked on the RFS map as **Bushfire Prone Land**.

4. **No details in the DA of fire fighting facilities necessary for the site.** We don't see guidance on this aspect from the D.A.

5. **No detail in the DA of how Holley's Rd, a Council maintained road, will be expected to meet the extra traffic requirements generated by the Primitive Camping Ground.**

In your Document it states 'any existing Access Points from Council's road network will require upgrading in order to meet Council's current standards'. (p2 Guide for Primitive Camping Ground) We see no mention of this in the DA.

Has Council raised this issue with the Applicant? Has Council considered the cost of this undertaking?

We presume this upgrade would be necessary for both Holleys Rd access from Mt Mackenzie Rd and also existing access to the campground from Holley's Rd. Are you able to supply this information to us please ?

6. **It is stated that such activities/development, of primitive camping grounds, should be "FOR SHORT TERM USE"**. (p1 Guide for Primitive Camping ground) This D.A. proposal has the potential for long term use, only a minimum of 2 camping days is mentioned, no upper limit of camping days. Surely new guidelines are necessary for longer term use. It would appear Council has not considered this possibility and had intended to approve a D.A. on short term use.

7. **No detail in the D.A. listing the Council standard is met by Toilet Facilities, in accordance with AS 1428.1-2009 being adhered to.** (p 2 Guide to Primitive Camping Grounds)

This is critical detail for the guests and their effect on close residents, as water from the site flows into Curry's Creek, which flows through town and past houses of many residents in town.

Has Council sought advice from the necessary state agencies in regard to the possibility that two thousand visitors a year could be a water course problem in regard to pollution.

8. **No report provided in the DA for 'On-Site Sewage Management system from a suitably qualified consultant.'** (p1 Guide for Primitive Camping Grounds) . Any detail in this regard is listed as prepared by the Campground Director.

9. **In the DA there is no detail or guidance on dogs** that campers may bring with them. As this is a concern for us we would like to see Council give some guidance to the applicant and us on what we can expect in relation to animal welfare on surrounding residents who have stock. Also the effect on animal wildlife is a concern.

10. Prior to undertaking any work did the applicant obtain the required Development Consent and the Construction Certificate from Council before the D.A. was sent out to residents?

(p 1 Guide to Primitive Camping grounds)

We note that work had already begun on the Bubbletent structure long before the Neighbour Notification of D.A. was sent out..

Your guide clearly states that these should be obtained before work began and we would be very disappointed to learn that the applicant was given the "nod" before feed back was received from your residents and neighbours on Holley's Road.

11. No detail relating to on-ground camping.

Is the applicant aware that **on-ground camping** is not permitted **other than on designated camp sites?** (as noted p3 of Guide For Primitive Camping document.)

Who is to monitor and control this? This is not addressed in the D.A. .

12. In the D.A. there is no mention that all buildings and Bubbletents meet the current National Construction Code. We would assume that Council has especially checked that the bubbles meet those requirements as they are imported from another country with different building codes.

13. No mention that Caravan Parks in Tenterfield have been notified of this Primitive Camping D.A. as it will have an impact on their business. They should have the right to respond. Sufficient concerned parties have not been contacted, by just sending out a letter to only selected Holleys Rd residents, ten days before Council makes a decision, without putting up a sign up on our road or near the block in question, or publishing details of the DA in The Tenterfield Star.

We note that the **closest neighbour to the development**, one of the ratepayers, owners of 49 Holleys Rd, C&S Pryce, only received their **Neighbour Notification** in the mail on Wednesday 9th September, **two days before the original final submission date.** It's hard not to conclude that Council made a decision to rush this D.A. through without much comment from neighbours and residents on Holley's Rd..

14. No details on how the DA Applicant or Council is considering the needs of existing residents. These must be carefully considered in the approval of the proposed D.A. (p1 of Guide for Primitive Camping Grounds)

Is Council aware that a child minding centre might be planned near the applicant's site, that north of the applicant's site there are quite a few blocks already surveyed off and ready for sale to build residential dwellings. South West of the site six blocks have been approved by council and most are built on or are being built on.

Blocks on our property have also been surveyed and approved by Council to sell off in the future for further development. Is a primitive camp site suitable in a semi development and further residential development approved by Council in the future. Your guide lines specifically state the such development should not be close to residential development, which has been approved by the Tenterfield Council.

*** OBJECTIONS on the grounds of LACK OF RELEVANT DETAIL in THE DA on issues ARISING FROM your Document**

DEVELOPMENT CONTROL PLAN 2014 Tenterfield Shire Council (DCP 2014)

Rural Dwellings and other Rural Developments

1. No detail in the DA on ADJOINING AN AGRICULTURAL ENTERPRISE

“Where a proposed development for a dwelling or tourist accommodation will adjoin an agricultural enterprise on an adjoining property, a minimum 100m separation shall be provided. Where the 100m buffer cannot be achieved, Council will consider the use of vegetative buffers on the proposed development site.” p 45 of 84 DCP 2014

The DA map shows that Bubbletent sites 2 and 3 are positioned 40 metres from our common boundary. This does not meet the requirements stated in your document. Also we don't want to look at naked people bathing as we pass by. One hundred metres is a very sensible guide line. This will also apply to Campbells and Watts agricultural enterprises.

The location of Yoorooga Merino Stud has previously been outlined, as directly abutting the Primitive Camping Ground, on its western boundary fence, with daily and /or seasonal activities comprising vehicle usage (quad bikes, trucks, tractors), ploughing, livestock grazing and movement, all taking place along that boundary. A cattle handling yard is also located on the boundary. All these existing agricultural activities will generate noise and dust impacting on the experience of the campers.

There are at least two other agricultural enterprises within 100 metres of the Campground - J and L Campbell, with a shared boundary to the south, Chris Watt Warrenfels Estate to the north.

2. No detail in the DA on Bushfire Protection.

“ Bushfire Protection

All applications for Development in Bushfire Prone areas (as identified on Council's GIS mapped Bushfire Prone Land) are to be accompanied by a bushfire risk assessment in compliance with the relevant requirements of the NSW Rural Fire Service. Reference is to be made to the requirements of “Planning for Bushfire Protection 2006” produced by the NSW Rural Fire Service www.rfs.nsw.gov.au p 44 of 84 DCP 2014

The Document referred to “Planning For Bushfire Protection 2006 “ has been superseded by the RFS Document ‘Planning for Bushfire Protection November 2019’, with vital information, insights and new requirements gained from the experiences of the catastrophic Bushfire Emergencies and situations in Australia in 2019.

Tenterfield made up a very significant and much publicised national location for some of these emergencies, and Holley's Road was one of the terrifying bushfire emergency locations involved.

2. No detail in the DA on Vehicular Access Requirements

“In areas identified as Bushfire Prone, access to the development must meet the current requirements of the Rural Fire Service (Planning for Bushfire Protection 2006).” p44 Of 84 DCP 2014

This should now be addressed by the DA in relation to the RFS 2019 document, with its additional insights and regulations regarding vehicular access.

“The developer will be responsible for construction or upgrading of any vehicle access in accordance with Council standards.” p44 of 84 DCP 2014

This has not been addressed by the DA or Council

4. No Detail in the DA relating to ADDITIONAL TRAFFIC LOADS on Holley’s Rd. (despite the fact the applicant estimates extra two thousand visitors per annum)

“Chapter 6 - applies to all zones under the TLEP 2013 Access and Traffic Generation “

“The potential of a development to create additional traffic loads on the road network needs to be assessed. For smaller developments, there is unlikely to be any appreciable impact, and it will be sufficient to ensure that safe access (road connection and footpath crossing) is provided as required. For more significant developments, Council may require a Traffic Impact Study to be undertaken in order to address the following matters:

The rate of traffic generation associated with the proposed development;

The impact(s) the traffic generated by the development will have on traffic efficiency, amenity, safety, and road pavement life;

The cost impacts of traffic generated by the development and how those costs are to be met; and In addition, consideration must be given as to whether the development constitutes ‘traffic generating development’ (as per Schedule 3 of the State Environmental Planning Policy (Infrastructure) 2007), and thus whether it must be referred to the Roads and Traffic Authority for comment.” p 61 of 84 DCP 2014

We argue this is NOT a smaller development, as the traffic increase on Holleys Rd, and also Mt Mackenzie Rd, will be significant.

It will have a negative impact on the lifestyles and privacy enjoyed by all existing residents of Holleys Rd.

It will impact on road safety and road pavement life as above in your document.

It will impact on costs of road to Council as above in your document. Previous developments on Holleys Rd suggest this will be at least in the area of \$80,000 to \$100,000.

CONCLUDING STATEMENT

As consenting authority we understand that Council will do due diligence on this D.A. and that the Chief Executive, Council personnel, the Mayor and elected councillors will have been consulted and offered their considered judgement, in the making of your final decision.

If at decision time, Council makes the decision to approve the D.A. for the Primitive Camping Ground we understand that Council : (Unless notified otherwise in writing by Council)

1. Has considered all the Objections in submissions presented to Council and that Council has completed their due diligence on all aspects raised in relation to the danger of fire to the Holley's Rd residents, firefighters and future guests of the applicant and is satisfied no increase danger is evident on this fire prone land.
2. Has considered that residents of Holley's Road and neighbours to the campground will suffer no increased Bushfire risk by approving the D.A.
3. Has considered and completed due diligence on the access and egress of the site for visitors and residents, in relation to fire, road conditions and safety of all.
4. Is satisfied that the applicant is carrying the necessary level of Public Liability to cover any damage resulting from negligence of the applicant or of their guests.
5. Is satisfied that the D.A. submitted by the applicant meets Council safety and noise standards for their rate payers in Holley's Road.
6. Is satisfied that the information supplied by the RFS will be fully implemented by the applicant and such instruction will protect residents from serious harm.
7. Has completed due diligence in relation to animal welfare and farming difficulties with the D.A. butting against farming land.
8. Is satisfied that all structures on the proposed site adhere to Australian standards.
9. Is satisfied that Climate Change should not be considered when making a determination of this D.A. in regard to fire risk.

We would ask Council to notify us in writing of a list of documents they hold in regard to the Objections received to this DA and to create a file containing these documents for the future.

We wish to acknowledge that Council personnel have been very helpful in preparing these objections to the D.A.

We appreciate the help we have received.

Thank you,



From: Council
Sent: Thursday, September 10, 2020 4:01 PM
To: Tamai Davidson <t.davidson@tenterfield.nsw.gov.au>
Subject: FW: DA No. 2020.069 Primitive Camping Ground

Not registered.

Ann Lohse
Records Coordinator
Customer Service, Governance & Records
Tenterfield Shire Council
PO Box 214, Tenterfield NSW 2372

Phone: 02 6736 6000

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Email: a.lohse@tenterfield.nsw.gov.au

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COVID 19 statement:

Council has implemented strict protocols to ensure we comply with directions issued by government in relation to managing the COVID 19 risk.

These protocols apply to our staff, our customers and visitors to our premises, and councillors alike.

Some non-essential services have ceased altogether, others are still in operation but due to social distancing have added levels of complexity.

Please be understanding that we will do our best to maintain services and help in what are unique and challenging circumstances.

From: [REDACTED]
Sent: Thursday, September 10, 2020 3:18 PM
To: Council <Council@tenterfield.nsw.gov.au>
Subject: DA No. 2020.069 Primitive Camping Ground

Good afternoon

We are writing in reference to the proposed Primitive Camping Ground at 57 Holley's Road, Tenterfield. We do not object to the proposal, however just have a few concerns we wanted to air as close neighbours to this property.

- Holley's Road is already in a fairly poor state of repair. We are concerned that the extra traffic from the camp ground will be too much for the road. Will the owners of the camping ground be at all responsible for the road?

- Dogs- Are they going to be allowed in the grounds as this is a farming area and there would be a lot of concern about dogs chasing and possibly harming neighbouring stock.
- Will there be a caretaker at the grounds? We are very worried about people having campfires that could potentially get out of hand. Also will there be a caretaker to ensure noise levels are kept to a minimum for the neighbours?

Thank you for your time.

Sent from Mail for Windows 10

20 JAN 2021

	Action	Info
CE		
CCO		
DI		

Chief Executive,
Tenterfield Shire Council,
247 Rouse Street,
TENTERFIELD.
NSW. 2372.

Dear Chief Executive,

I would like to advise that we have read the amendments to the property of 57 Holley's Road and would like to object to this venture going ahead. We have not been notified by your council of this, but have been advised by other residents.

On building our home, we were advised by Council that "spark arrestors" had to be inserted in the brickwork, and that any tall trees around our house site which could possibly fall on the home had to be removed. We also had the cost of another water tank, which was for firefighting only.

This area has extensive long love grass for animals, as well as extreme fire risk and on record, we had evacuations orders from a fire at the end of Holley's Road last year.

Council's responsibility for maintenance of Holley's Road is inadequate and poor. There has been no mowing for some considerable time, and the road surface is very patchy, succumbing to pot holds after rain.

We purchased in this area for a quality lifestyle and we maintain our property to a high standard.

This venture will change risk and lifestyle to all in Holley's Road.

Tenterfield has ample caravan parks, motels and other accommodation available.

For this reason, we definitely object to the approval going ahead.

Kind Regards,

Tenterfield.

Dated at Tenterfield 19/01/2021

Tenterfield NSW 2372
21 January 2021

Submission with Objections to Tenterfield Shire Council re;
Development Application No:2020.069 Primitive Camping Ground
Lot 6, DP 1146294; 57 Holley's Road Tenterfield

To the Chief Executive Tenterfield Shire Council and Tamai Davidson Manager Planning & Development,

We recently received a letter dated 12 January 2021, Ref: IN20/3250CCCF in regards to the above stated DA for 57 Holley's Road along with an amended copy of the proposed site plan. The letter stated we were previously notified of the Development Application during August 2020; we were NOT notified, neither was a DA notice placed on Holley's Road for a change of usage for a commercial venture within a rural residential subdivision.

The letter also stated, quote; "Should we wish to provide a submission which includes an objection to the proposal... etc"

We are somewhat confused, are we expected to accept that a new 'glossier' set of plans with some added landscaping is supposed to answer all our concerns in our original submission?

Is our submission lodged in September 2020, which states our subsequent concerns and objections, being seriously looked into?

Are we being fobbed off?

Has qualified opinions been sought by the appropriate authorities such as The Rural Fire Service re; designated 'Bushfire Prone Land' and ease of access for emergency vehicles? We went through seriously threatening and frightening bushfires on our doorstep last season.

Has an inspection and opinion been sought by Road/Traffic Safety authorities to address the safety and condition concerns of both Holley's Road and Mt McKenzie Road as stated in our original submission?

Just as a little aside here of the potential extra traffic; if the proposed 2,000 people per year, supposing 2 people per vehicle, therefore 1,000 vehicles, take just 3 trips 'out and about' doing the tourist thing, that equates to a potential extra 230 trips per week, up and down a single vehicle wide, dead end country lane in poor condition! *And as a matter of interest, at least to us since John is Irish, the single biggest cause of accidents/deaths on Irish country roads is from international visiting drivers. [As stated in the DA; the business will be marketed & promoted to International visitors].*

What about a health authority opinion on the issue of added dust in residential water collection from the onsite loop road?

With all this in mind we would like to **formerly re-lodge our original submission and objections** and have it up dated to the 21st of January 2021 to ensure all concerns will be deliberated seriously.

We ask to be assured our submission along with this letter is duly noted, dated and lodged within Councils records for any future reference.

There are **many questions** in our original submission we want answered, not just ignored.

And finally, I do trust the possible attraction of some extra tourist dollars to a few local businesses and the carrot dangled to Council of, quote: *"to further support the overall tourism profile for Tenterfield"* does not override **the safety, health and lifestyle of Holley's Road Residents' which MUST be considered and respected!**

Not to mention the safety of all the Mt McKenzie Road residents using that road and driving by Holley's Road corner on a daily basis.

Signed: . . .

Signed

Tenterfield NSW 2372
10th Sept 2020

Submission with Objections to Tenterfield Shire Council re;
Development Application No:2020.069 Primitive Camping Ground
Lot 6, DP 1146294; 57 Holley's Road Tenterfield

To the Chief Executive,

The above Development Application has recently come to our attention by neighbors, yet to date we have not received any notification from Council. We would question if this is normal procedure, *(given we live on Holley's Rd just a few doors down from the property in question)* not to notify residents in such close proximity and when application has been made to council for an Accommodation Camping Ground, surely this being a **commercial venture** it would require a change of usage to conduct such a business and a DA sign to be erected on Holley's Road for any objections?

We would also question, is it within correct council guidelines to approve such a commercial development in the midst of rural residential sub-division??

Those who have made their home here have been attracted to this small subdivision specifically for the quiet rural retreat to retire to and/or have their hobby farm, thinking a 'no through' country lane would be safe from commercial developments and all that brings by our front door, most notably a LARGE increase in traffic, potential of increased fire danger, contributed addition of dust as well as potential of excess noise and disturbance from possible unruly holiday makers.

With that in mind and as residents of Holley's Road we take this opportunity to express and SUBMIT OUR OBJECTIONS:

Firstly, we would like to make reference to the submission by _____th September 2020, barring their personal 'side of the fence' issues, we agree and wish to stand with them on their excellent points of objection, much of which is from long term background knowledge and experience of this area, as our much valued generational Farmers could only know firsthand eg: threatening weather patterns, fire threats, habitats of protected/endangered species as well as dangerous wildlife such as poisonous snakes.

Also in regards to the subject of Fire threat, we acknowledge the _____ submission which covers this subject very well with back up references to Rural Fire Services information.

OBJECTION TO THE ADDED FIRE THREAT ISSUE

Has the applicant acquired the 'required issue of a Bushfire Safety Authority from the NSW Rural Fire Service' as stated in the following Quote from Tenterfield Councils;

Guide for Primitive Camping Grounds

Quote: Pursuant to the provisions of Tenterfield Local Environmental Plan 2013 the development is defined as; etc

Quote: The DA component is the planning approval for the development and considers such matters, including, but not limited to; traffic, **bushfire**, waste management, environmental impact and noise.

- **Bushfire Assessment** – if the land is mapped as Bushfire Prone on Council's Bushfire Prone Land Maps, the proposal is classified as 'integrated development' requiring the issue of a Bushfire Safety Authority from the NSW Rural Fire Service. The RFS website has information in relation to this form of development, which is referred to as a 'special fire protection purpose' under Section 4.2; <http://www.rfs.nsw.gov.au/plan-and-prepare/building-in-a-bush-fire-area/types-ofdevelopment/special-fire-protection-purpose-vulnerable-members-of-the-community>

The fire threat issue has been very well covered by Mr & Mrs Holley's submission to which we would draw your attention. **To their list of facts covered** we will just add our personal reflection as residents having been through two severe fires in short succession last year and John McCormack being a Fireman with Fire & Rescue.

The first fire that started around the corner from us last September, that went across the south of town and as the Holley's pointed out: "*started with one match*", also burnt backwards toward Curry's Gap for several days on the borders of properties just across Mt McKenzie Road, for those days we saw fire burning not far across the road from us, not a reassuring sight as a turn of wind could have been disaster all over again.

Then a month later, the fire that raged over the hill at the end of Holley's Road was extremely frightening. While John being a fireman, was protecting property on the hill, Jen was bracing to defend our property on her own. We would like to state, ***unless you've been through the fear of it close at hand, you cannot imagine what it is like.***

We strongly object to a regular influx of unwary tourists camping nearby on designated Fire Prone land, this is a great cause of concern to us.

Slashing Love Grass annually does not extinguish the threat of runaway fire. Love grass will burn from stubs down into the ground and remain a smoldering threat for days. The local Fire and Rescue team of which John McCormack is a fireman, were called repeatedly to fires last season that flared up several times from slow burning root systems of love grass, of which the only way to extinguish beyond threat in the long run was to spray fire-retardant foam. Love grass proves to create a new kind of very hot, persistent fire into the ground as a result of its silica content.

We draw attention to the website of www.bubbletentaustralia.com

Bubbletent Australia's website shows their other Primitive Camping Ground situated in the Capertee Valley area NSW depicting many photographs, some of these showing an open fire pit and a 'woodfired bathtub' heated by fire pit beneath the tub with a fire flue/chimney. This is a great source of concern, any form of 'open' fire is a huge danger in this area of designated Fire Prone Land, we would question if it is even **legal in Fire Season?**

As the development application is for a Primitive Camping Ground, will campfires, fire pits, and fire heated bathtubs or any form of naked flames be allowed at this camp ground?

Many fires are ignited from airborne embers, campfires are often a source of creating this phenomenon and a dirt road will not 'break' their flight. **That flight direction with the prevailing winds from the designated site is generally westerly/north westerly direction heading easterly straight over homes on Holley's Road and on to Tenterfield township.**

As far as an internal road creating a firebreak around the property, on a number of occasions that Fire and Rescue were called to in the last year, many of them jumped not just a dirt road, but bitumen roads and the New England Highway included.

Also, where is the water supply coming from to deal with the possible event of a fire started from a campfire and/or other human error, and will any public liability insurance cover the cost? The question is, in the event of a fire being started at the camp ground, where does the onus fall on Council should they approve such a development in the first place, in a such a high risk area?

It took numerous water tankers, firetrucks, helicopters and a 737 Water bombing plane, not to mention dozens of firefighters to stop the fire coming down to Holley's Road residents and potentially across town last October, and that went on for days. It's not far to town from here 'as the crow flies'!

We would question the common sense and legality of a **Primitive Camping Ground** on designated Fire Prone land. Such an enterprise would be putting local residents along with unsuspecting holiday makers at high risk in more ways than one, many of these tourists as the Application states are likely to be overseas visitors, far beyond knowledge of the volatility of our Aussie bush, not to mention Aussies who haven't a clue either. And then there are the ones that just don't care: "I'm on holiday, I'm paying for this, I can have a camp fire if I want!"

Who will be permanently on site 24/7 to oversee and enforce rules and how can they be enforced??

As a final note on the Fire issue, we bring your attention to Councils latest News Letter 7 September;

Under Article: **NSW RURAL FIRE SERVICE GET READY WEEKEND**

Quote: *"This year we've seen an unparalleled number of events impacting large areas of NSW happen in quick succession, highlighting the importance of being prepared for all hazards."*

The timing and insensitivity of the Primitive Camping Ground proposal appears to be counter to the concerns of not only Tenterfield Council, but other Councils and Authorities across NSW and Australia, and a slap in the face to those who endured the horrors of the mass fires across Australia in this last year. Surely it should be understood we residents may feel rather 'on edge' re; this development proposal?

THE TRAFFIC ISSUE

Again, we bring your attention to Councils;

Guide for Primitive Camping Grounds

Pursuant to the provisions of Tenterfield Local Environmental Plan 2013 the development is defined as; etc

Quote: The DA component is the planning approval for the development and considers such matters, including, but not limited to; **traffic**, bushfire, waste management, environmental impact and noise.

- It is also likely that any existing access point from Council's road network will require upgrading in order to meet Council's current standards contained in the . Details of any works required will be the subject of a Section 138 Permit application made to Council and a subsequent approval issued.

Will there be sufficient upgrading to ensure road safety to Holley's Road and Mt McKenzie Road drivers, cyclists, walkers, joggers, horse/riders, school children?

Holley's Road is certainly not suitable for a large increase in traffic as the application indicates a potential 2,000 people per year, whilst this may equate to 1,000 vehicles, the number of trips in and out as the holiday makers visit tourist attractions, shops, florists, including night time trips to and from venues/restaurants, **would considerably boost actual traffic numbers on the road exponentially.**

There must be consideration of the width and poor state of the road, even given that council workers came and filled pot holes just yesterday, the loose gravel from filling potholes just adds another threat.

Not to mention that the road went under water from the culvert just outside our driveway in a flash just last year in the midst of a large hail storm and left slippery mud on the road in its wake.

We ourselves have very poor visibility both left and right while driving out our own driveway because of the long growth on the verges in front of our property. We have attempted at times to trim some but the tall tough grasses, brambles, uneven terrain, culvert and rocks make it impossible to clear much with our modest equipment.

We also bring your attention to the corner entrance turning from Holley's Road onto Mt McKenzie Road, this has the same poor visibility from the state of the verge and with traffic travelling at 80km would most certainly pose a threat to all traffic.

The most potentially dangerous issue is;

turning into Holley's Road from Mt McKenzie Road, with a **90 degree bend a few metres back** and the 80km speed of traffic on Mt McKenzie Road, with **NO proper turning lane**, there is nowhere for unsuspecting drivers rounding the bend to go, other than a patch of loose gravel, should they encounter 3 or 4 vehicles lined up while one is waiting to make a right turn. Is there a Traffic Authority ruling on such a potentially dangerous turning across a busy road???

Not just domestic vehicles frequent this road but so do tourist RVs going to Mt McKenzie lookout, cattle trucks, log trucks, dump trucks, earth moving machinery on trucks, water trucks, Council rubbish trucks, tractors, cyclists, joggers, walkers, school children, horses/riders and kangaroos!

Some tourists not being familiar with an area generally drive slower whereas residents that drive the road daily and wanting to get home, drive at the top of the speed limit, and some even use it as a 'drag strip'. All in all, this is a serious recipe for disaster for residents and tourist alike, not to mention rare breed livestock that might be grazing near fence lines, ours included.

Who will be held accountable in the event of a traffic disaster on the corner, the driver or the authority responsible for the state of the road?

We confirmed with the Developer Howard Hall, that he paid in the vicinity of \$60,000.00 to Tenterfield Council in road upgrade, which was paid for access for the handful of new residents, not to provide for commercial ventures.

We strongly object to a greater influx of tourist driven traffic on the grounds that the previous upgrade is NOT sufficient to safely carry such extra influx of traffic.

THE DUST ISSUE

We draw attention to a statement in the Development Application under the heading of; ENVIRONMENTAL IMPACTS

Quote: *"During dry periods, any dust disturbed on the internal access road will not impact neighbors or watercourses."*

This is a very broad statement with nothing to back it up as to how and why there will be no impact!!

How can such a statement be made and stand up when the person making the statement has not lived here and experienced such things as the strength and direction of prevailing winds and any accompanying dust?

We also draw attention to the Application heading:

SITE DESCRIPTION AND ANALYSIS

Location and Property Description Satellite Map (Figure 1)

As is shown on the map, the border line of the property in question is a large battle axe block, of which the proposed 'access road' circles completely. That equates to quite a lot of road as it loops back on itself and situated just behind the residential homes on Holley's Road.

Will the intended loop road on the property be sealed in order to limit extra excess dust?

This can be a very windy area at any time of the year with the worst of the windy period being late winter and spring and again in summer, with the prevailing winds being largely westerly to north/westerly. That direction blows straight over the area in question and generally directly in

line with the residents on Holley's Road as well as Tenterfield township, indeed, the fire of September 2019 was driven by this direction of prevailing winds, and also brought them to our doorstep a month later.

These residential homes rely completely on rooftop collection of water as their sole domestic water supply, and as well some of we residents have off grid solar power with rooftop solar panels that provide our sole power supply.

Dust on the roof puts excess unhealthy sludge in the tank water, our drinking water, and dust on the solar panels decreases the power generating efficiency. This is an ongoing issue already without compromising it with additional dust sources.

The camp ground operating on a 24/7 hourly basis (as stated in the application), allows for continual traffic, and driving at 5km per hr does **NOTHING** to stop clouds of dust, as we can attest to, and just the westerly drift will deposit that on rooftops anyway. However, when boosted by prevailing westerly-north/westerly winds it doesn't even need a vehicle to disturb it, the winds do that all on their own and, with the resulting airborne dust also playing havoc with our health and wellbeing (lungs, sinuses, eyes etc) as we have already experienced personally.

We strongly object to any added dust potential. The proposed loop road just behind our properties, if unsealed, will have a DEFINITE IMPACT on roof top rainwater and solar collection and the residents' health and wellbeing.

CONSTRUCTION WORK ALREADY IN PROGRESS!

Once again, we bring your attention to Councils;

Guide for Primitive Camping Grounds

Pursuant to the provisions of Tenterfield Local Environmental Plan 2013 the development is defined as; etc

- **Prior to undertaking any works** in association with establishing a camping ground, it is necessary to obtain the required development consent and construction certificate from Council by way of lodging a Development Application (DA) and Construction Certificate (CC) for assessment.

In reference to the above guideline, we draw your attention to the fact that construction has been underway for some time now. Heavy machinery, dump trucks, workers vehicles have been frequenting Holley's Road for a considerable time to date. At least one of the timber decks has been constructed.

Referring to Councils Guideline, it clearly states that "*development consent and construction certificate must be obtained **PRIOR** to undertaking any works.*"

The DA has not been approved, it is still open to objection, no consent could have been given. What is Councils course of action to this?

OUR FINAL STATEMENT OF OBJECTION

Holley's Road is but a short country lane providing access to a small rural residential subdivision and farms (Holley's and Watts). The quality of the road condition is totally inadequate to carry a greater influx of traffic and the access corner would be dangerous with higher traffic levels. School children use this road twice a day to catch the school bus on the corner as well.

We strongly object to the said 'commercial accommodation business', this will certainly impact the safety of the residents of Holley's Road (and also Mt McKenzie Road), and also disrupt the quieter life we and our fellow residents sought to retire to.

Who will be permanently on site to OVERSEE AND ENFORCE rules such as traffic speed, fire lighting, over imbibing of alcohol and subsequent unruly behavior, excess noise and/or loud music etc???

The Residents' safety, health and lifestyle MUST be considered and respected!

Signed: _____

Signed _____

Saved in IN 20/325000CF
see IN 21/40550E0F

The General Manager
Tenterfield Council Chambers
Tenterfield.

Dear Madam/Sir,

We refer to the amendment for a Primitive Camping Ground App No 2020.069, Lot 6, DP1146294, 57 Holleys Rd, Tenterfield, received by us last week, previously notified to us and other residents of this rural subdivision, during August 2020.

We note that the amendments really only address some of the issues, that were poorly, or not at all, covered in the original D.A. The amendment tries to address the issues in council written guide lines on rural development, which should have certainly been dealt with in the original D.A.

Unfortunately the real elephants in the room, bushfire risk and access/egress conditions, continue to be ignored or not addressed by the applicants or Council.

We understand that all our former objections in our submissions still stand and the D.A. will come before Council in February.

We understand that the General Manager, with whom we had corresponded in the past, has moved on. If a new general manager has been appointed or an acting manager is in place, we would ask please, that you could take the time to consider the files containing all the objections from residents, on this vexed D.A.

In summary, we object to the D.A. being approved due to the following :

1. The campsite land use proposed will come into significant conflict with our existing and ongoing farming activities.

Guests will not be happy with us spraying crops, ploughing, mustering sheep and cattle to existing stockyards on the boundary. Bikes and stock will be present every day bordering this proposed development. Council's (DCP 2014, p45) 100 metres distance requirement for each campsite (tourist accommodation) placement from the three adjoining agricultural properties bordering this small site should be enforced.

We have the right to continue farming without coming into conflict with new land use.

Is the applicant aware that we will be conducting extensive road works along the complete western boundary of their camping area, to provide access to our blocks,

which will come up for sale in the near future. The new road, which has been surveyed and approved by Council, will be dirt, causing dust to certainly float onto their small site. They should expect to have possibly five residents travelling the new road each day in the near future.

2. Council's Development Control Plan 2104, p 45 states 'any new development should be located at a minimum distance of 40 m from any watercourse' Campsites 2 and 4 (see amended DA plan) are located right beside the water course (labelled Intermittent Gully on map) and have the potential to be flooded. The watercourse is subject to significant flooding during heavy storms. In the last ten years we have seen this area flood three times.

3. The site is located on Bush Fire Prone Land (RFS) presenting serious problems to existing residents living in close proximity as well as campers.

Planning for Bushfire Protection RFS Document 2019 becomes active because of the site's classification as Bush Fire Prone Land.(RFS Map)

This document gives council strategic guide lines for Bush Fire Prone Areas.

As consenting authority Council must: (RFS Planning For Bushfire Protection 2019)

- * mitigate the identified risks, (p 36)
- * not allow the land use to increase the level of bush fire risk to the existing community, (p36)
- * consider the safety of existing residents and the proposed land uses effect on them, (p36)
- * discourage the establishment of incompatible land use in bush fire prone land, (p36)
- * reduce the number of human induced bush fire ignitions, (p10)
- * consider the history of bushfires of the site and assess the fire hazard in regard to vegetation and weather. (p35)
- * take into account, occupant vulnerability on bush fire prone land. (RFS Document p 49 and p 9))

The guests of the proposed D.A. are targeted occupants of the RFS. They have reduced capacity to evaluate the risk and respond adequately to fire. They will be unfamiliar with the area and less aware of bushfire impacts.

* The applicant and Council have not made any attempt to tackle the serious fire problems this D.A. presents. The fire document accompanying the D.A. provides no solace to residents of Holleys Rd as it does not even acknowledge the serious fire risks this D.A. presents.

It leads many of us to wonder, does Council and the applicant really appreciate the danger they are placing our residents in?

It is Council's responsibility to consider these factors and also the psychological pressures and real danger that their existing residents are facing.

This is the responsibility of Council, not the RFS, and must be addressed in their decision making.

4. Danger created by surrounding unfenced dams and drowning. This issue has not been addressed by the applicant. Campers will wander and explore. The proposed site is surrounded by at least six unfenced dams on properties bordering the camp sites. The dams are deep and dangerous to not only non-swimmers but swimmers also. This is another reason the D.A. shouldn't proceed.

5. The site of the D.A. is located at the very end of a narrow, one lane, no through road. The road is in a poor state and if cut as a result of fire, some residents will not be able to escape. The road is also a problem for guests as no escape route is possible if the road is cut due to fires. The applicants and council must be aware of this situation but no mention of it in the D. A. RFS Document has specific guidelines for access and egress on Fire Prone Land.

There is no mention in the D.A. that the applicant is prepared to contribute money to Council to upgrade Holley's Road and the turn off from the Mt Mackenzie Road, in order to cater for the extra traffic generated by their business. The council maintained one lane road and turn off from MacKenzie Road will need extensive upgrading and guest parking will need to be developed to a standard to cater for large vehicles parking out the front of their property.

Our research would suggest a minimum of one hundred and fifty thousand dollars would be needed to upgrade and provide the necessary infrastructure for their proposed business.

6. General objections

- * The site is too small, not at all remote, as per definition of a 'Primitive' camp site. Located a couple of Kilometres from the town centre.
- * Located right in the middle of a rural housing complex. Surrounded by sixteen houses, varying from 40 metres (app) to 300 metres (app) from the proposed site. Outside this distance further houses are located, along Mt Mackenzie Rd.
- * Site of the black summer 2019 fires that endangered Tenterfield and Holleys Rd directly, leaving residents of Holleys Rd traumatised.
- * Camp fires and fires to boil water on wooden platforms, lit by guests everyday

- * Two residents of our rural subdivision) will have people camping forty metres from their backyards, lighting fires without any supervision, and both with unfenced dams on their property. This really is not acceptable, for such a situation to be allowed to exist, living in fear of fire or a drowning in your own backyard !
- * Covered in African Lovegrass. This a metre high, recently cut, further increasing fire danger, with a thick layer of dead grass sitting on top of new growth.
- * Unrestrained Dogs brought to the campground endanger valuable stock on neighbouring sheep stud.
- * No onsite management to monitor fire risk/use, night noise, pet control, general safety of inexperienced guests.

Thank you

I have been tracking rainfall and the functionality and state of the gully since October 2019 (one month prior to purchase) as part of our interest in water management and repairing erosion etc for the block.

I am attaching a document which shows the position and depth of the gully, where water travels to and pools plus the state of the gully banks. Since October 2019 there have been a few major storms where we have had significant rainfall into the gully however at no stage has it breached the top of the gully over the banks and certainly nowhere near the recommended location for Site 4. Grass is growing back around the gully area indicating no major erosion has been occurring despite regular rainfall. Once the water enters the gully it is naturally draining away into the creek bed as the block recovers from drought.

Our longer term plans are to re-vegetate the banks of the gully with native vegetation to further capture and manage water and resolve any erosion issues.

We had always had plans to take the water flow into account for Site 4 deck and raise the deck approximately 1 metre from the ground. I am attaching examples of other international sites to show how they are managing deck safety and privacy. We would follow similar principles albeit meeting NSW safety standards.

We would still like to proceed with approving all 4 decks on the condition we factor in any ground water and potential flooding issue in Site 4 by raising deck platforms to ensure flooding is not an issue. Note this has already been factored into Site 1.

Refer to Example Safety Railings and Tenterfield Intermittent Gully Photos (13MB). Please let me know if either document doesn't attach.

1. Example raised deck, safety railing and partial privacy screen.



2. Example rope safety railing.



Tenterfield Intermittent Gully Photos, 57 Holleys Road

Current suggested position for Site 4. Where I am standing taking the photo is the deck location – well away from the gully.

Pink highlighted path is the intermittent gully, and the black circle is the lower dam. The pink dot to the left hand side is area the water pools. The yellow area indicates the planned location for Site 4.

The following photos will summarise the waterflow from October 2019 – January 2021 highlighting the depth of the gully (able to manage heavy downpours/flash ‘flooding’) and its ability to store water and direct it away from site 4 as well as site 3.

Water enters the top of 57 Holleys Road, is initially captured in the top dam, flows through a berm to the lower dam and to the gully.



Tenterfield Intermittent Gully Photos, 57 Holleys Road

14 October 2019

Water only pooling away to the south of Deck 4 (see pink dot above). Average rainfall for Tenterfield during month - 17mm.



Tenterfield Intermittent Gully Photos, 57 Holleys Road

20 October 2019

Further rainfall for Tenterfield 8mm. Dam empty, nil water over the top of the gully.



Tenterfield Intermittent Gully Photos, 57 Holleys Road

25 June 2020

29 mm rainfall for the month. Gully only pooling. Grass returning to banks.



Tenterfield Intermittent Gully Photos, 57 Holleys Road

30 July 2020

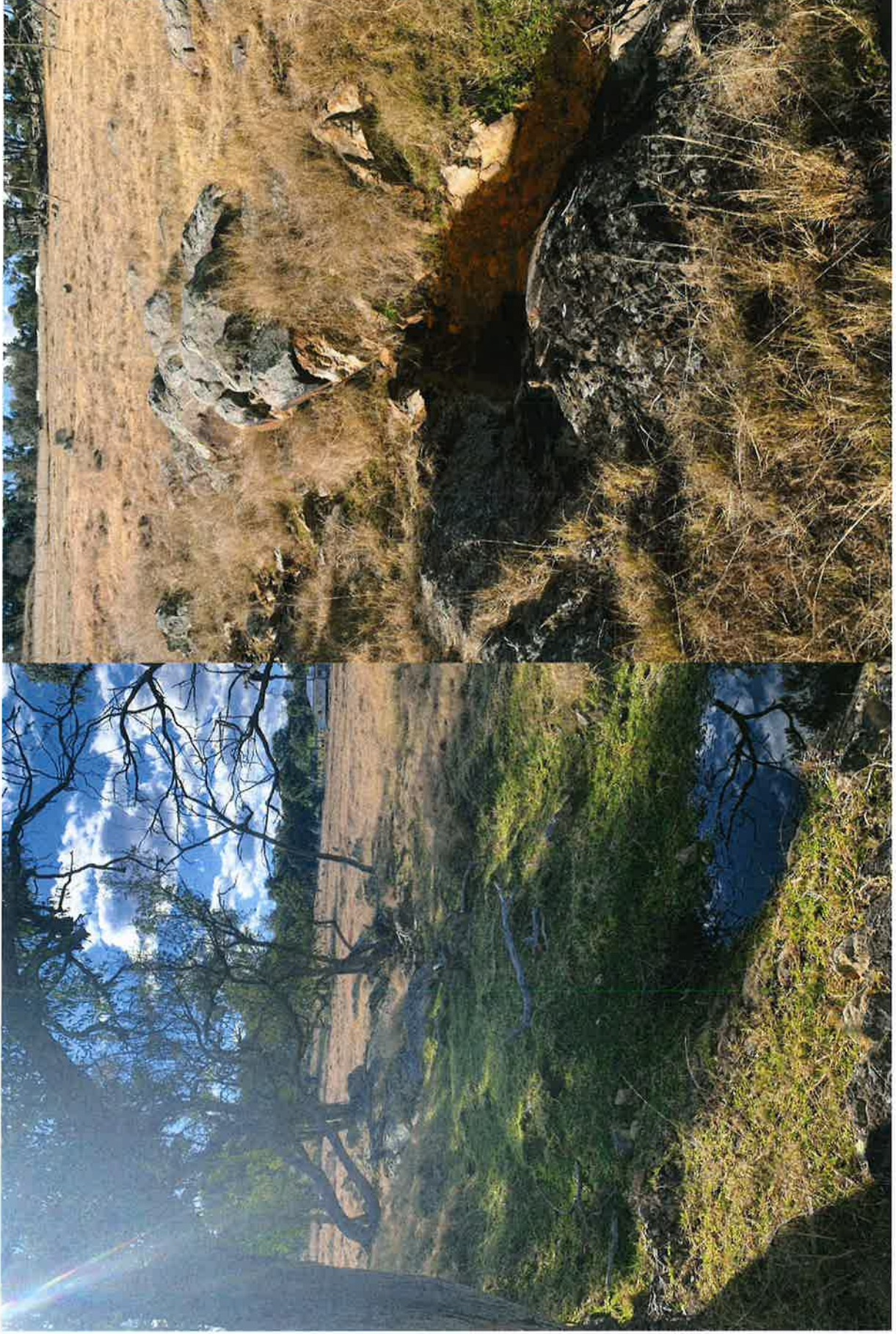
38mm rainfall for the month. Water only pooling away to the south of Deck 4.



Tenterfield Intermittent Gully Photos, 57 Holleys Road



Tenterfield Intermittent Gully Photos, 57 Holleys Road



Tenterfield Intermittent Gully Photos, 57 Holleys Road



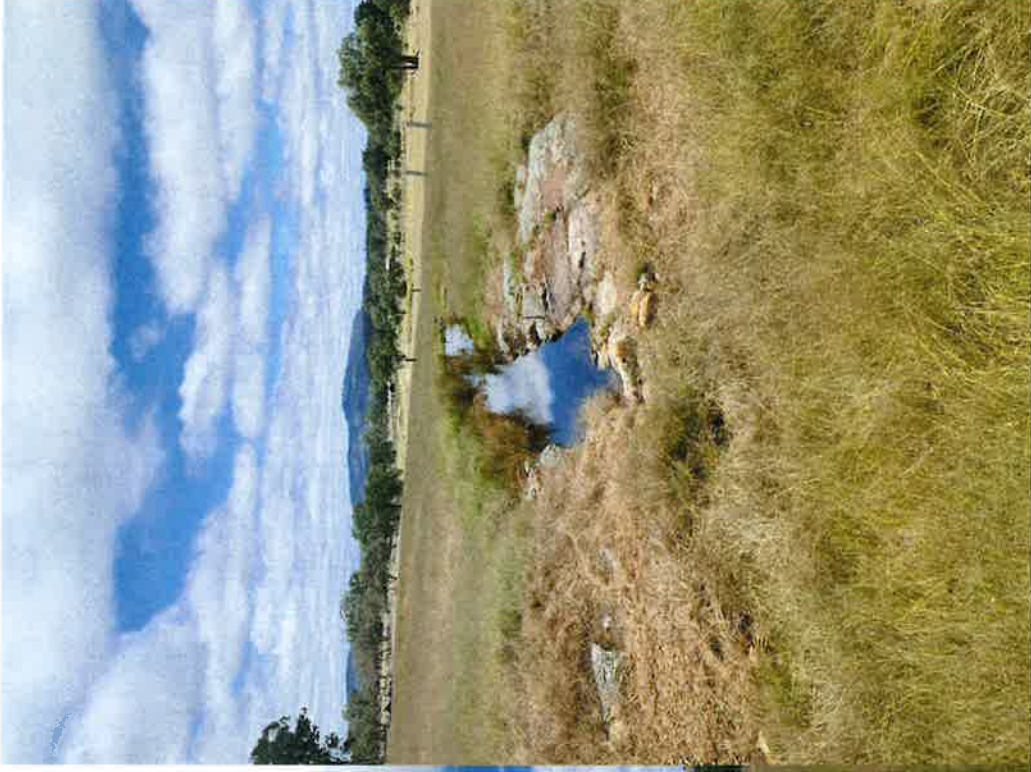
Tenterfield Intermittent Gully Photos, 57 Holleys Road

3 December 2020

October 52.8 mm rainfall Tenterfield. Water pooling away to the south, nil further erosion.



Tenterfield Intermittent Gully Photos, 57 Holleys Road



Tenterfield Intermittent Gully Photos, 57 Holleys Road

18 December 2020

Rainfall to date for the month 146.5mm. Nil water visible above gully.



Tenterfield Intermittent Gully Photos, 57 Holleys Road

9 January 2021

Another 76mm total rainfall from 18 Dec – 9 January – water in gully still being held within banks. Nil water above gully.

