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| ALLOCATED OFFICER | Jorgen Peeters | | |
| DATE RECEIVED | 14-Apr-2016 | | |
| PROPERTY NUMBER | 173010 | | |
| PROPERTY ADDRESS | 180 ERSKINE FALLS ROAD, LORNE VIC 3232 (Lot 1 TP18315) | | |
| LOT SIZE | 4ha | | |
| TITLE DETAILS | Has a complete and current copy of title/s been submitted? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | |
| | Are there any restrictions, covenants, s173 agreements on title? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| | Details: N/A | | |
| | Does the application contravene any of the requirements? | Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| | Does the application site plan and subdivision plan (if relevant) correspond with the title plan/s? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | |

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| APPLICANT | 10 Consulting Group for Livewire Park Pty Ltd |
| OWNER | WALMER MANOR PTY LTD |
| PROPOSAL | Use and Development of the Land for an Outdoor Recreation Facility and Removal of Native Vegetation (Section 96A application in combination with Planning Scheme Amendment C116) |

| | |
|------------------------------|--|
| ZONE | Rural Conservation Zone |
| ABUTTING RDZ | Yes <input checked="" type="checkbox"/> Road Zone Category 2 No <input type="checkbox"/> |
| OVERLAY/S | Bushfire Management Overlay Significant Landscape Overlay - Schedule 1 |
| PARTICULAR PROVISIONS | 52.03 Specific Sites and Exclusions 52.06 Car Parking 52.17 Native Vegetation 52.47 Planning for Bushfire |
| VICSMART | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| INCORPORATED PLAN | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| HERITAGE | Is the site listed in the Shire's Heritage Significance Study? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |

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|-------------|------------------|--|----------------------|
| FEES | Amount: \$815.00 | Paid: Y <input checked="" type="checkbox"/> N <input type="checkbox"/> Pt <input type="checkbox"/> | Outstanding: \$ 0.00 |
|-------------|------------------|--|----------------------|

| | | |
|---|--|---|
| WILL DEVELOPER INFRASTRUCTURE CONTRIBUTIONS APPLY? If yes, why: | Section 173 Agreement Creation of additional lots New commercial floor space | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| WILL A COMMUNITY INFRASTRUCTURE LEVY APPLY? If yes, why: | Section 173 Agreement A lot created after 1 August 2013 More than one dwelling | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |

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|-------------------------|---|---|---|----------|---------------------|-----------|
| PRE-APPLICATION | Has there been any pre-application consultation? | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | | | |
| | Details: Meeting with Kate Sullivan, Bill Cathcart and Karen Hose on 25/02/2016 | | | | | |
| RELEVANT HISTORY | App No: | 13/0425 | Decision: | Approved | Date issued: | 23/1/2015 |
| | Proposal: | Use and development of a dwelling and native vegetation removal | | | | |
| | Comments: | Permit not acted upon. | | | | |

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|--------------------------|---|---|
| CULTURAL HERITAGE | Is the site within the cultural sensitive mapped area on GIS? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| | Is the proposal defined as a high impact activity? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| | Is a Cultural Heritage Management Plan required? Check online at http://www.aav.nrms.net.au/aavQuestion1.aspx | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Provided <input checked="" type="checkbox"/> |
| | Is referral/notice to AAV considered appropriate? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| CROWN LAND | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | If Yes, is Coastal Management Act consent required? Yes <input type="checkbox"/> No <input type="checkbox"/> |

PROPOSAL

The application seeks approval for Use and Development of the Land for an Outdoor Recreation Facility and Removal of Native Vegetation. The application is concurrently made with Planning Scheme Amendment C116 pursuant to Section 96A of the Act.

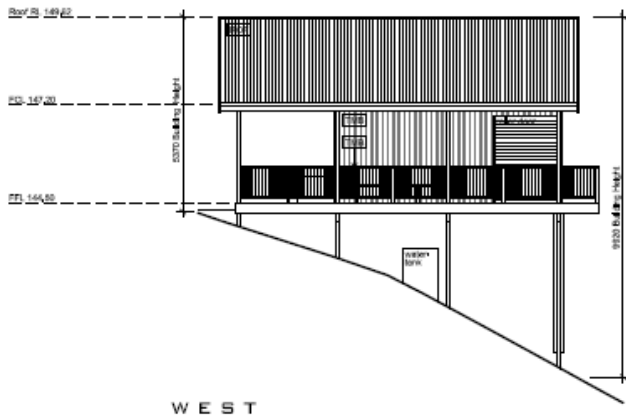
The plans considered as part of the application are the revised plans prepared by Vibe Design Group (Project No. V177, dated June 2015, Rev. 02) submitted on 8 November 2016. The application was not amended prior to notice but was amended after notice in response to submissions.

The proposal seeks to establish a ropes adventure course within the established tree canopy across the site enabling people to zip line and walk between tree canopies. The proposal involves the attachment of cables and platforms to the trees. A range of courses are proposed to suit the needs of different ages and abilities. Courses include the EcoZip rollercoaster zip line (known as the 'tree top crazy rider') and eight Altus ropes courses of varying difficulty.

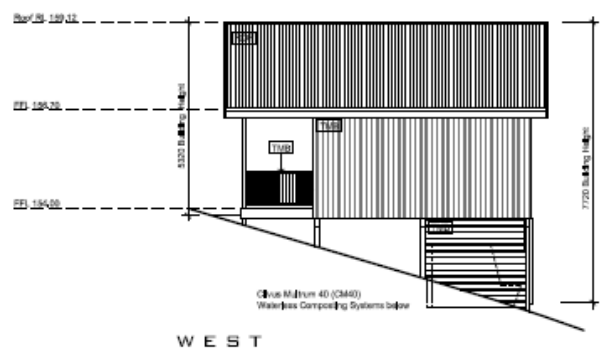
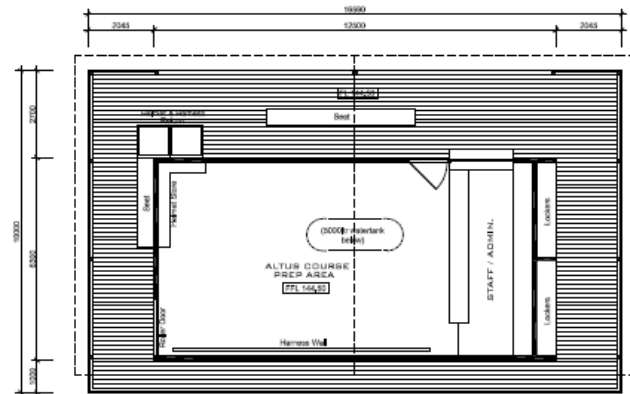


Associated infrastructure and facilities include:

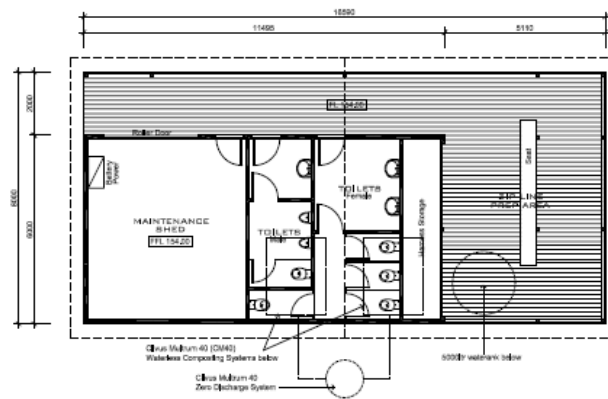
- An administration/office building with a floor area of 165m² and a maximum building height of 9.92m above natural ground to the roof apex. The building will be sited relatively central on the site and will be set back approximately 63m from Erskine Falls Road at its closest point.
- An amenities and storage building featuring a preparation area and toilets. The building has a floor area of 132m² and a maximum building height of 7.72m above ground level. It will be sited towards the rear of the site (approx. 15m from the rear boundary).
- Existing vehicle access loop track with access from Erskine Falls Road
- On-site parking along the existing track for 61 cars and a shuttle bus. The shuttle bus will pick up customers from collection points in Lorne (e.g. Cumberland hotel, Mantra).
- Off-grid solar panel system
- Waterless composting toilet system
- A main 162,000L water tank plus 5,000L tanks underneath both buildings. A separately accessible connection valve for firefighting purposes is proposed.



BUILDING 1



BUILDING 2



The buildings will be constructed on stilts and have a simple form with timber clad walls (recycled or sustainably sourced Australian hardwood – Blackbutt or Silvertop Ash), a pitched corrugated iron roof and covered deck areas. Pathways winding through the trees will connect the vehicle access track with the buildings and course platforms. No café or indoor activities form part of the proposal.

The proposal has been designed and sited to retain the canopy vegetation, and seeks to offer a tourism use that will deliver social and economic benefits to Lorne and surrounds.

The proposal is seeking approval of operating hours between 8.30am and 9.30pm daily, except Christmas Day and declared extreme and code red fire danger days, however is likely to operate at reduced hours in non-peak periods. Conditions have been included on the Draft Planning Permit to reflect this and to ensure the facility does not operate after dark.

The facility is expected to attract between 60-80 visitors at any one time in peak periods, with up to 300 people over the day. There will be up to 25 staff required to manage the facility in peak times, and approximately 15 staff at other times. Customers will be required to book online prior to visiting the facility and will be given a 2-hour time limit to complete the course. Examples of established tree top adventure parks in Victoria are Enchanted Maze at Arthurs Seat (Mornington Peninsula), Otway Fly at Beech Forest (Otway Ranges) and Trees Adventure at Belgrave (Dandenongs).

The application involves the removal of native vegetation. A total of six trees will be required to be removed to facilitate the siting of the buildings. The installation of course platforms, ropes and wires will necessitate some pruning of trees. Attachment of course infrastructure to trees will occur through using timber battens and ropes. No drilling is required. It is noted that understorey vegetation has been removed prior to lodgement of the application for fire prevention purposes.

SITE AND SURROUNDING AREA

A site inspection was undertaken on 2 June 2016.

Figure 1: Zoning

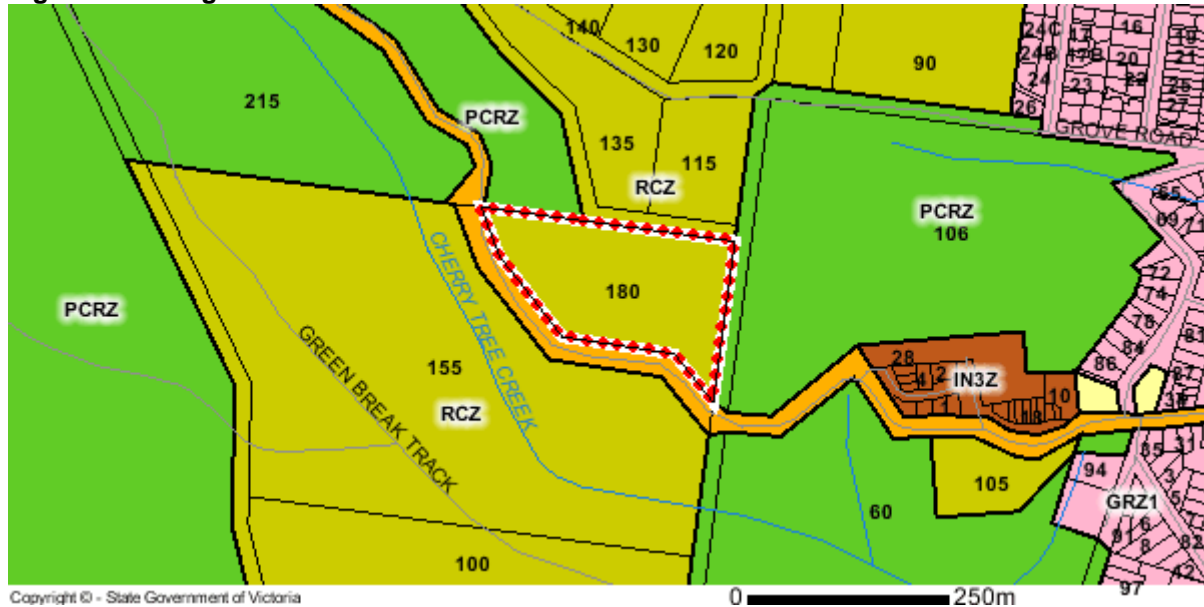


Figure 2: Subject site and surrounds



The subject site has an area of 4 hectares and is located just outside the Lorne township, approximately 200 metres to the west of the industrial estate and about 1km from the Lorne CBD. The site is currently vacant and has a total frontage of 407.29m to Erskine Falls Road. The site is covered by a dense tall tree canopy (predominantly Blue Gum and Mountain Grey Gum) and understorey vegetation that varies in quality from poor in disturbed areas to good in intact areas. A large portion of the site has previously been cleared from understorey and groundcover vegetation for fire prevention purposes. The site has a moderate to steep generally south-facing slope (15-17°) and is bisected by a north-south aligned gully on the eastern section. The highest point of the site is at the northern boundary at an elevation of RL 161. The low point is adjacent to the Erskine Falls Road frontage at RL 107. There is existing vehicle access onto Erskine Falls Road along the southern boundary of the property and a series of internal formed tracks which connect with the road reserve on the north side of the site.

Adjoining land to the north and south is characterised by privately held densely vegetated allotments. The two properties to the north (115 and 135 Grove Road) – separated from the subject site by a road reserve with an access track – are both developed by a dwelling nestled within the vegetation, whilst the property to the south (155 Erskine Falls Road) is vacant. Land to the east and northwest is Crown land forming part of the Great Otway National Park. A powerline easement abuts the eastern boundary.

REFERRALS

Notice of the combined amendment and permit application was sent to the following external authorities pursuant to Section 96C of the Act:

| Authority | Response | Received |
|----------------------|--|--------------------------|
| DELWP | Does not object to the amendment. Following the provision of further information does not object to the issue of a permit. Recommends conditions for inclusion on permit. | 19/09/2016 29/11/2016 |
| CFA | No response | |
| CCMA | No objection | 8/09/2016 |
| VicRoads | No objection | 12/08/2016 |
| Southern Rural Water | No objection | 12/08/2016 |
| Powercor | No objection | 26/09/2016 |
| Barwon Water | No objection | 25/08/2016 |

The following internal referrals were undertaken:

| Department | Advice/ Comments/ Conditions |
|--------------------------------|------------------------------|
| Infrastructure | Consent with conditions |
| Environmental Health | Consent |
| Community Emergency Management | No response |
| Environment & Climate Change | No response |

PUBLIC NOTICE

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|--|--|--|-----------|
| Is the land owned, occupied or managed by Council? | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <i>If yes, must comply with Clause 67</i> | |
| Advertising required? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> , <i>why not?</i> Notice of the combined amendment and permit application was given under Section 96C of the Act. | | |
| Advertising method: | <input checked="" type="checkbox"/> Letters | Date letters sent | 2/08/2016 |
| | <input type="checkbox"/> Sign(s) on site | No. of signs required | - |
| | | Location of signs | - |
| | | Date signs displayed | - |
| | <input checked="" type="checkbox"/> Newspaper / Publication | <input checked="" type="checkbox"/> Surf Coast Times <input checked="" type="checkbox"/> Echo <input checked="" type="checkbox"/> Government Gazette | |

SURF COAST PLANNING SCHEME PROVISIONS

Rural Conservation Zone (RCZ) and Schedule *last updated VC103*

| Clause | Requirement | Proposal | Permit required |
|---|--|--|---|
| Clause 35.06-1 Use of land | <i>Leisure and recreation (other than Informal outdoor recreation) is prohibited.</i> | Outdoor recreation facility Site specific exemption at Clause 52.03 applies | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Clause 35.06-5 and Schedule Buildings and works | <p><i>A permit is required to construct a building or construct or carry out:</i></p> <ul style="list-style-type: none"> <i>Buildings and works associated with a Section 2 Use (exemptions apply).</i> <i>Earthworks which change the rate of flow or discharge point of water across a property boundary.</i> <i>Earthworks which increase the discharge of saline groundwater.</i> <i>A building which is within any of the following setbacks:</i> <ul style="list-style-type: none"> <i>100 metres from a Category 1 Road;</i> <i>40 metres from a Category 2 Road;</i> <i>20 metres from any other road;</i> <i>5 metres from a boundary;</i> <i>100 metres from a dwelling not in the same ownership;</i> <i>100 metres from a waterway, wetlands or designated flood plain.</i> | Buildings & works | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Clause 35.06-7 Advertising signs | <i>Advertising sign requirements are at Clause 52.05. Category 4 requirements apply</i> | No Advertising signage proposed as part of the application | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |

Significant Landscape Overlay – Schedule 1 (SLO1) *last updated VC124*

Great Ocean Road and Coastal Environs – Bells Beach, Point Addis, Big Hill and Lorne Hinterland

| Clause | Requirement | Proposal | Permit required |
|--|---|---|---|
| Clause 42.03-2 Permit requirement | <p><i>A permit is required to:</i></p> <ul style="list-style-type: none"> <i>Construct a building or construct or carry out works.</i> <i>Construct a fence if specified in a schedule to this overlay</i> <i>Remove, destroy or lop any vegetation specified in a schedule to this overlay.</i> <p><i>(See exemptions)</i></p> | Buildings & works No fence proposed Vegetation removal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Schedule 1: 3.0 Permit requirement | <p><i>A permit is required to construct a fence.</i></p> <p><i>A permit is required to remove, destroy or lop native vegetation, except where:</i></p> <ul style="list-style-type: none"> <i>The land is outside the area shown on the Schedule 1 Habitation Envelope Areas, and:</i> <ul style="list-style-type: none"> <i>The vegetation is dead</i> <i>The vegetation is less than 2m in height and is not shown on an approved landscape plan or site plan specifying its retention</i> <i>The vegetation is on the building side of a vertical line 2m from the outer edge of the</i> | No fence proposed Vegetation removal The land is within the area shown on the Habitation Envelope Maps, but the vegetation is not located within an approved habitation envelope. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

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| | <p>roof of an existing or approved building.</p> <ul style="list-style-type: none"> The vegetation is listed as an environmental weed in the incorporated document "Environmental Weeds-Invasaders of our Surf Coast, 2nd Edition (2002)" The land is within the area shown on the Schedule 1 Habitation Envelope Maps, and the vegetation is located within an approved habitation envelope. | | |
|--|--|--|--|

Bushfire Management Overlay (WMO or BMO) last updated VC109

| Clause | Requirement | Proposal | Permit Required |
|--|--|--|---|
| Clause 44.06-1 Buildings & works | <p>A permit is required to construct a building or to construct or carry out works associated with the following uses:</p> <ul style="list-style-type: none"> Accommodation Child care centre Education centre Hospital Industry Leisure and recreation Office Place of assembly Retail premises Timber production <p>(See exemptions)</p> | Buildings & works associated with Leisure and recreation | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

Particular Provisions

The following particular provisions are considered in respect to this application:

| Provision | Permit triggers/Requirements | Permit Required/ Applicable |
|--|---|---|
| 52.03 Specific Sites and Exclusions | <p>Land identified in the schedule can be used or developed in accordance with specific controls contained within an incorporated document.</p> <p>The specific controls may allow the land to be used or developed in a manner that would otherwise be prohibited or restricted.</p> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| 52.05 Advertising signs | The Advertising sign category is Category 4. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 52.06 Car Parking | <p>The table at Clause 52.06-5 sets out the number of car spaces required for uses not covered by a car parking requirement for a use specified under another provision of the planning scheme or a schedule to the Parking Overlay.</p> <p>A permit may be granted to reduce or waive the number of car spaces required.</p> <p>There is no rate specified for an Outdoor recreation facility and accordingly, car parking is to be provided to the satisfaction of the responsible authority.</p> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| 52.17 Native vegetation | A permit is required to remove, destroy or lop native vegetation (exemptions apply). | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| 52.47 Bushfire Protection: Planning Requirements | This clause sets out requirements for buildings and works within areas covered by the Bushfire Management Overlay. Refer to | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

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| | bushfire assessment attached to this report. | |
| 52.48 Bushfire Protection: Exemptions | This Clause specifies exemptions for vegetation removal associated with existing or approved dwellings and fence lines. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |

State Planning Policy Framework

The following State policies have been considered with respect to this application:

- Clause 12.01 Biodiversity
- Clause 12.02 Coastal areas
- Clause 12.04 Significant environments and landscapes
- Clause 13.03 Soil degradation
- Clause 13.05 Bushfire
- Clause 15.02 Sustainable development
- Clause 17.03 Tourism

Local Planning Policy Framework

The following provisions from the LPPF have been considered in respect to this application:

- Clause 21.01 Profile and Vision
- Clause 21.02 Settlement, Built Environment, Heritage and Housing
- Clause 21.03 Environmental Management
- Clause 21.04 Tourism
- Clause 21.06 Rural Landscape
- Clause 21.10 Lorne Strategy
- Clause 22.04 Coastal Development Policy

The Municipal Framework Plan (Clause 21.01-4) establishes that *“The underlying principle that directs all local policy and strategies of the Surf Coast Planning Scheme is that **the natural environment is the single most important attribute and asset of the Surf Coast Shire.**”*

Key strategic directions relevant to the proposal are:

- *To manage population and tourist growth and development in an ecologically sustainable manner.*
- *To protect the fragile coastal and forest environments and scenic landscapes that separates the coastal townships, from urban sprawl and inappropriate development.*
- *To promote natural resource based tourism, at a scale and form that respects its setting, the surrounding land uses and its locale.*
- *To promote Lorne as a primary tourist destination on the Great Ocean Road while protecting and enhancing its highly vegetated coastal urban character, residential amenity and forest hinterland.*

General Provisions

| | | |
|------------------------|---|---|
| 62 Exemptions | <i>Are there any exemptions relevant to the proposal?</i> | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 63 Existing uses | <i>Do existing use rights apply?</i> | Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 65 Decision guidelines | <i>Does the proposal meet the following relevant decision guidelines?</i> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

Relevant Incorporated and/or Reference Documents

The proposal complies with the Incorporated Document *“Livewire Park, Tree Top Adventure Facility, 180 Erskine Falls Road, Lorne, April 2016”*. This document has the effect of allowing a planning permit application to be considered for ‘Outdoor recreation facility’ to be undertaken on the subject land that would otherwise be prohibited by the RCZ.

Relevant Planning Scheme Amendments and/or Strategies

The application was lodged concurrently with Planning Scheme Amendment C116 which seeks to introduce the Incorporated Document "*Livewire Park, Tree Top Adventure Facility, 180 Erskine Falls Road, Lorne, April 2016*" into the Surf Coast Planning Scheme.

OBJECTIONS

The application received 3 objections.

Council's electronic storage system (TRIM) was checked on 6 December 2016.

The concerns raised in the submissions can be summarised as follows:

- An adventure park is inappropriate within the RCZ. RCZ land should be protected from development
- Approval will set a precedent for other RCZ land to be developed, including Bells Beach area
- Treatment and storage of wastewater
- Insufficient traffic management infrastructure and car parking based on the visitor numbers
- Scale of buildings and structures will cause visual and amenity impacts (noise, music, rubbish)
- Impacts on the natural watercourse, vegetation and wildlife
- Bushfire risk
- Park is designed for young persons only and does not accommodate for individuals with disabilities
- Bushfire risk
- Park is designed for young persons only and does not accommodate for individuals with disabilities

A written response was provided to the objectors, however none of the submitters wished to withdraw their submission or take up the opportunity for further discussions.

DISCUSSION OF KEY ISSUES

Strategic Context

The proposal is strongly supported by the State and Local planning policy framework. In particular, the proposal is consistent with the following objectives and strategies:

- Ensure that tourism developments support a nature based approach within non-urban areas and that developments are of an appropriate scale, use and intensity relative to the location and minimise impacts on the surrounding natural visual, environmental and coastal character.
- Conserve, protect and enhance biodiversity and areas with identified environmental, cultural and landscape values.
- Encourage development that is sensitively sited and designed and respects the character of coastal settlements.
- Encourage sustainable tourism by developing a network of tourism opportunities throughout the Great Ocean Road region and supporting tourism activities that provide environmental, economic and social benefits.
- Protect and enhance the indigenous vegetation cover in Lorne, with particular emphasis on the tall tree canopy.
- Promote Lorne and its hinterland as a year round tourist destination whilst protecting its natural environment and scenic values by establishing sustainable tourism activities in the hinterland.

The *Lorne Strategy* at Clause 21.10 recognises that Lorne's economy is strongly focused on tourism and acknowledges the importance of Lorne's hinterland to the town's tourism industry as an attractive environment for accommodation, ecotourism activities and other low scale tourism operations.

Clause 21.04 *Tourism* identifies that the tourism industry is underpinned by the coastal location, environmental values and scenic qualities of the Surf Coast. It states that tourism benefits the community by supporting the local economy and providing jobs, however the benefits of tourism need to be balanced against the potential negative impacts, including pressure for developments that have potential to compromise the low scale and vegetated character of the coastal towns and the natural environment and landscape values of environmentally sensitive locations in the rural and coastal hinterland.

The strategy further recognises that:

- The focus of tourism is broadening as tourist developments seek to capitalise on the environmental and landscape values of the rural hinterland for nature based tourism.

- The Great Otway National Park provides opportunities for the development of nature and adventure based activities, both passive and active.
- The uneven concentration of tourist visitations that rely on peak holiday periods, day trips and the coast.

Clause 21.04 seeks to enhance and expand the tourism industry, whilst protecting the environmental, landscape and cultural values of the Shire and the lifestyle of its residents through the following strategies:

- Limit non-agricultural based tourism development to the Lorne coastal hinterland and other selected rural areas. Such developments to be small scale, nature and adventure based tourist activities and accommodation that are compatible with natural processes.
- Ensure new tourism development uses high quality, low intensity, unobtrusive, site responsive buildings and works based on ecologically sustainable design principles.
- Encourage use and development that will increase visitor length of stay and increase visitor numbers in the off peak period.
- Encourage the development of a diverse range of quality tourist accommodation and facilities to meet changing visitor needs.

Clause 21.06 *Rural Landscape* recognises that the settlements and nearby hinterland of the Great Ocean Road are popular tourist destinations. It describes the Lorne hinterland being characterised by dense, tall forest where there may be potential for some small scale tourist accommodation but it will be limited by bushfire, environmental values and physical site constraints. The strategy encourages tourism facilities that are limited in their intensity and scale to avoid adverse visual impact on the natural environment and rural landscape and to retain the marketing characteristics of low key, eco-based tourist values.

It is policy to apply the following principles when considering an application for a non-agricultural land use and/or development:

- Buildings should be of modest scale and nestle into the landscape
- Buildings should be subservient to the landscape so as not to detract from its visual qualities
- Proposals should include net gain environmental outcomes
- Development should be self-sufficient in the provision of infrastructure and associated costs

Clause 12.02-6 *The Great Ocean Road Region* seeks to ensure that development in this area is managed in a sustainable manner and without detrimental impact to the significant landscapes and environmental and cultural values of the region. The policy encourages sustainable tourism by developing a network of tourism opportunities throughout the region and supporting tourism activities that provide environment, economic and social benefits.

The proposal is also consistent with State and regional tourism strategies (e.g. *Regional Tourism Strategy 2013-2016*) that encourage nature based tourism in the Otways and Great Ocean Road Region. The *Lorne Destination Action Plan 2015-2017* seeks to promote Lorne as a destination of all seasons (growing shoulder and off peak seasons), increase visitor length of stay and enhance and broaden the visitor experience.

Use of land

The use is currently prohibited under the Rural Conservation Zone. Amendment C116 modifies the Schedules to Clauses 52.03 (Specific Sites and Exclusions) and 81.01 (Incorporated Documents) to include the Incorporated Document "*Livewire Park, Tree Top Adventure Facility, 180 Erskine Falls Road, Lorne, April 2016*", to enable a planning permit application for the use to be considered on the subject land.

The use of the land for a nature/adventure based outdoor recreation facility is considered consistent with the purpose of the RCZ to protect and enhance the natural environment, natural resources and biodiversity of the area and to encourage development and use of land which is consistent with sustainable land management and land capability practices, and which takes into account the conservation values and environmental sensitivity of the locality.

The proposed facility is a sustainable use that will provide social and economic benefit to the Lorne community and broader Surf Coast economy while conserving the majority of the site in a natural state. The use is dependent on the tall tree canopy and natural setting and proposes low impact construction.

The site is well located for a tourist use being sited only 200m from the urban edge of Lorne and on a main tourist route (i.e. the well-travelled route to Erskine Falls). The facility would complement the town and Great Ocean Road region's role as a primary tourism destination that is underpinned by natural attractions, provide an alternative to the beaches and beach/surf related activities and widen the variety of nature/adventure based activities currently on offer such as bushwalking, trail running and mountain biking. It would contribute towards

achieving the objectives of increasing visitation in the off-peak period, increasing visitor length of stay and broadening the visitor experience.

Although not quantified through an economic impact assessment, other economic benefits expected to be generated by the proposal include:

- Direct investment, construction jobs, direct jobs associated with operation of the facility and indirect jobs in the town and wider area as a result of the multiplier effect
- Support for other local businesses by increased visitation
- Benefits in health and wellbeing through increased levels of participation in sport and recreation

Visual impacts on the immediate environs, such as Erskine Falls Road and the Lorne township, and beyond to the Great Ocean Road will be minimal due to the retention of the tree canopy. The proposed office and amenities building are well setback from Erskine Falls Road and the zip line and ropes course infrastructure will sit within the tree canopy.

Rural Conservation Zone

The decision guidelines of the zone require Council to consider a number of elements relating to general, rural, environmental and design and siting issues and the conservation values identified for the land in the zone schedule.

The land is currently not used, and is unsuitable, for agricultural activities given the dense tree cover. The environmental and design and siting issues are the most relevant to this application and the key consideration is whether the proposed use and development protects and enhances the environmental and landscape qualities of the site and its surrounds.

The decision guidelines for applications within the Rural Conservation Zone include:

| Decision guideline | Response |
|---|--|
| General issues | |
| <ul style="list-style-type: none"> ▪ <i>The State Planning Policy Framework and the Local Planning Policy Framework, including the Municipal Strategic Statement and local planning policies.</i> ▪ <i>Any Regional Catchment Strategy and associated plan applying to the land.</i> ▪ <i>The capability of the land to accommodate the proposed use or development.</i> ▪ <i>How the use or development conserves the values identified for the land in a schedule.</i> ▪ <i>Whether use or development protects and enhances the environmental, agricultural and landscape qualities of the site and its surrounds.</i> ▪ <i>Whether the site is suitable for the use or development and the compatibility of the proposal with adjoining land uses.</i> <p>Conservation values in the schedule:</p> <p><i>General</i></p> <ul style="list-style-type: none"> ▪ <i>The natural features, significant landscape, habitat or a particular rural environment</i> <p><i>Great Ocean Road hinterland</i></p> <ul style="list-style-type: none"> ▪ <i>The flora, fauna habitat, and scenic landscape</i> ▪ <i>Scenic landscapes relatively unaffected by development</i> ▪ <i>Remnant vegetation on private and public land and the coastal reserve</i> | <p>The proposal is consistent with the SPPF and LPPF and provides for the protection of the environmental and landscape qualities of the site and its surrounds through the sensitive siting and design of buildings and infrastructure and the retention of the tall tree canopy and bush setting. The site is suitable for and can accommodate the proposed use and development.</p> |
| Environmental issues | |
| <ul style="list-style-type: none"> ▪ <i>An assessment of the likely environmental impact</i> | <p>The environmental impacts of the proposal are</p> |

| | |
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| <p><i>on the biodiversity and in particular the flora and fauna of the area.</i></p> <ul style="list-style-type: none"> ▪ <i>The protection and enhancement of the natural environment of the area, including the retention of vegetation and faunal habitats and the need to revegetate land including riparian buffers along waterways, gullies, ridgelines, property boundaries and saline discharge and recharge areas.</i> ▪ <i>How the use and development relates to sustainable land management and the need to prepare an integrated land management plan which addresses the protection and enhancement of native vegetation and waterways, stabilisation of soil and pest plant and animal control.</i> ▪ <i>The location of on site effluent disposal areas to minimise the impact of nutrient loads on waterways and native vegetation.</i> | <p>discussed later in this report.</p> |
| <p>Design and siting issues</p> | |
| <ul style="list-style-type: none"> ▪ <i>The need to minimise any adverse impacts of siting, design, height, bulk, and colours and materials to be used, on landscape features, major roads and vistas.</i> ▪ <i>The location and design of existing and proposed infrastructure services which minimises the visual impact on the landscape.</i> ▪ <i>The need to minimise adverse impacts on the character and appearance of the area or features of archaeological, historic or scientific significance or of natural scenic beauty or importance.</i> ▪ <i>The location and design of roads and existing and proposed infrastructure services to minimise the visual impact on the landscape.</i> | <p>As the site is elevated and visible from Erskine Falls Road, glimpses of the buildings and ropes course infrastructure are likely to be obtained through the vegetation by passing traffic. However, the low profile and large setbacks of the buildings will ensure they will not be visually prominent or intrusive when viewed from Erskine Falls Road or nearby properties. Given the site's orientation to the south, the dense tree canopy and the distance from the Great Ocean Road it is not expected that the development will affect the scenic landscape values and environmental qualities within viewsheds of the Great Ocean Road and coastal environs. The proposal therefore also responds positively to the landscape character objectives of the SLO1.</p> <p>Revegetation with indigenous species around buildings and the driveway and parking spaces will be required as part of landscaping requirements so as to assist in blending into the surrounding landscape.</p> |

Bushfire Management

A bushfire management statement¹ has been submitted which recommends that the site be closed on days of extreme or code red fire danger and the site evacuated in the event of a fire on or near the site, rather than 'fire proof' the site through compliance with standard bushfire management measures such as increased BAL construction standards and vegetation clearance to create defensible space. The proposed use relies on retention of the large trees and bush setting throughout the site. The site will not be permanently occupied and will only contain non-habitable buildings. The objectives of the BMO are sought to be met through a Bushfire Emergency Management Plan (BEMP) and varied defensible space and vegetation management requirements, relying on Alternative Measure 3.6 of Clause 52.47.

The application has been assessed against the Bushfire Management provisions of the Surf Coast Planning Scheme and is considered acceptable. The detailed assessment table is attached to this report.

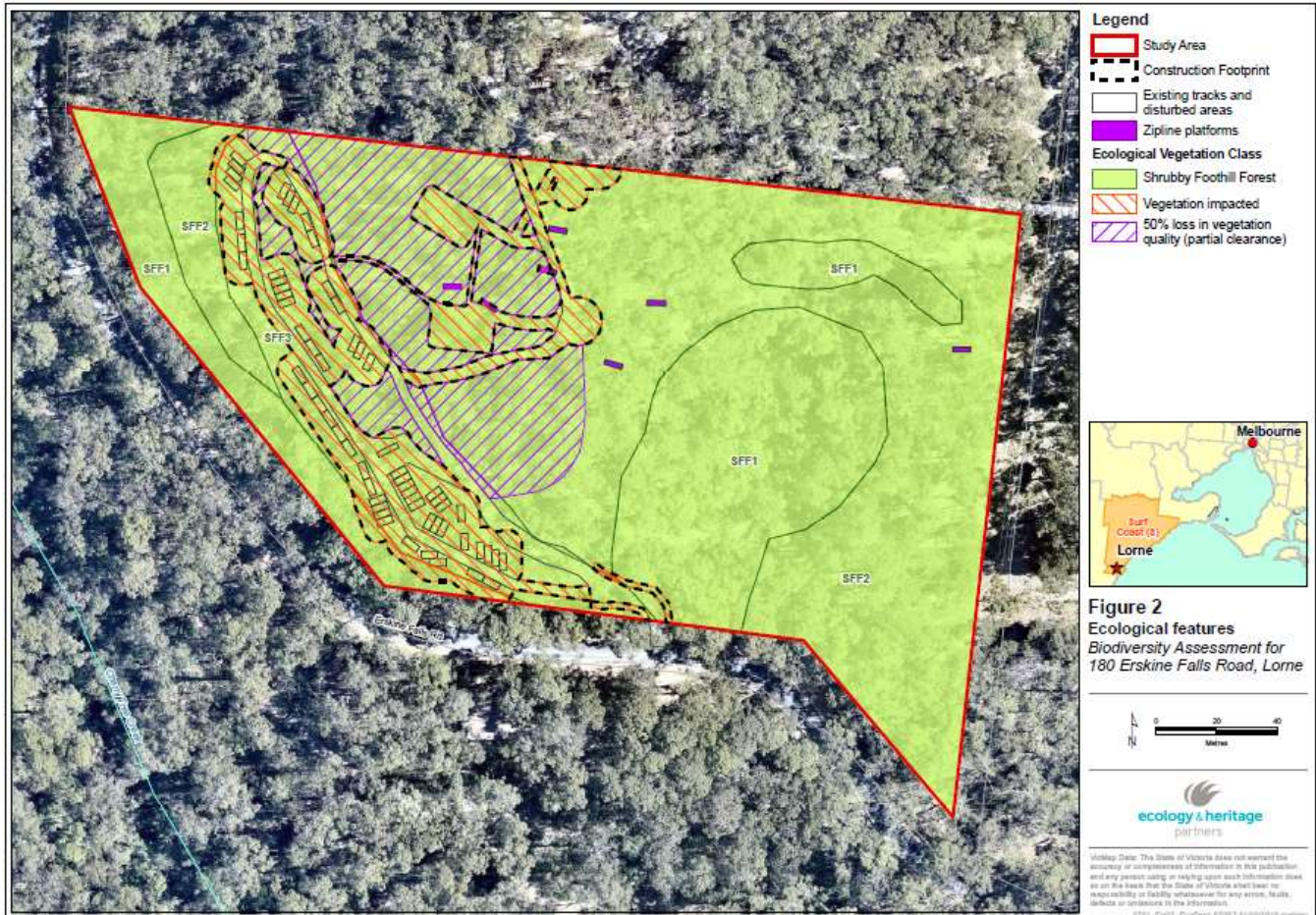
The proposed bushfire management response will mitigate any bushfire risk to visitors and staff and assist in preserving the existing vegetation on the site.

It is considered that the proposed development meets the objectives of Clause 52.47-2. Vehicle access and water supply will be required to meet CFA requirements and relevant conditions have been included on the draft planning permit.

¹ Terramatrix, Bushfire Management Statement for the proposed combined planning scheme amendment and development of a ropes adventure course at 180 Erskine Falls Road, Lorne VIC 3232, April 2016

Environmental Impacts

The site is covered by vegetation that is representative of EVC 45 'Shrubby Foothill Forest'. The site has an intact overstorey, dominated by Mountain Grey Gum and Southern Blue Gum, and a modified understorey. A total extent of 1.302 ha of native vegetation will be impacted by the proposal. This vegetation is located within the construction footprint of the proposed buildings, pathways, water tank, solar panels, access track and car parking and accounts for management of defensible space and vegetation previously removed (refer Figure below). The vegetation removal will require an offset of 0.264 General Biodiversity Equivalence Units in accordance with the *Permitted clearing of native vegetation – Biodiversity assessment guidelines* (DEPI, 2013) referenced in Clause 52.17.



The permit application falls under the 'high risk-based pathway' due to the extent of native vegetation to be impacted exceeding 1ha and the site being partially located within location risk area B. Clause 52.17 requires an application to consider the contribution native vegetation makes to Victoria's biodiversity. Based on available information it is determined that the native vegetation proposed to be removed has a Moderate contribution to Victoria's biodiversity.

Environmental considerations have formed an integral component of the proposal. The proposal relies on the retention and protection of the environmental values of the site for its operation and attractiveness as a nature based recreation facility. The proposed use and development has been designed to have minimal environmental impacts as follows:

- The platforms and ropes courses will be attached to trees utilising timber battens and ropes to minimise any damage. There will not be any drilling into trees. A Tree Management Plan has been prepared by a qualified arborist to provide measures for the protection and ongoing maintenance of the trees².
- The two buildings will have a small footprint and will be constructed on stilts to minimise vegetation removal and ground disturbance. A total of six trees and associated understorey vegetation will require removal. Offsets will be provided in accordance with the State government's biodiversity assessment guidelines.
- The existing track will be used as the main loop accessway. Car parking spaces will be located adjacent to the accessway and in between trees. Measures, such as bollards, barriers, mulching or landscaping,

² Otto Leenstra & Associates, Arboricultural Inspection and Report for Livewire Park, 180 Erskine Falls Road, Lorne, December 2015

are required to ensure vehicles do not directly damage any trees or compact the soil within the structural root zone of the trees. This is addressed in the aforementioned Tree Management Plan.

- The waterless wastewater treatment system does not result in any effluent disposal and has capacity to cater for the expected number of customers and staff, including at peak times.
- The proposal incorporates environmentally sustainable design features, including water tanks and solar panels.
- A shuttle bus service is proposed to reduce private car use.

Targeted surveys were undertaken for the nationally significant EPBC Act listed Wrinkled Buttons³. None were recorded on the site.

The site provides potential habitat for a number of nationally and state significant fauna species, however these are unlikely to be permanent residents on the site and are only likely to occasionally utilise the site for foraging and dispersal purposes⁴. It is accepted that the proposed outdoor recreation facility may affect the use of the site by these native animals, mostly during the day when the park is open to the public, however it is not considered that they would be displaced given the extent of forest in the surrounding area. To avoid threats to native fauna by domestic animals, a condition has been included on the draft planning permit prohibiting the presence of non-native animals such as dogs and cats on the site at any time (except recognised guide and assistance dogs).

A Cultural Heritage Management Plan has been prepared for the site and was approved by Aboriginal Victoria. No Aboriginal cultural heritage was identified in the activity area and is unlikely to occur.⁵

Pathways should be permeable and/or elevated (e.g. boardwalks) in places where there is likely to be an impact on the root zones of trees, rather than using compacted materials or site cut.

Traffic and Car Parking

Clause 52.06 does not specify car parking rates for an outdoor recreation facility or the broader land use term leisure and recreation, consequently car parking spaces must be provided to the satisfaction of the responsible authority. Based on the specifics of the proposal, the applicant's traffic consultants estimate that at peak times customers would generate a car parking demand of up to 36 spaces and staff a demand of 25 spaces, resulting in a total of 61 spaces⁶. 61 car spaces have been shown on the plans along the access track.

The number of car parking spaces proposed is considered satisfactory, however some of the proposed spaces are located very close to trees. The arboricultural assessment recommends that vehicles do not encroach onto the Structural Root Zone (SRZ) of trees that are to be retained so as not to cause soil compaction which may affect the health and longevity of the trees. The assessment recommends the protection of the SRZ through mulching and planting of understorey species or the installation of timber bollards. The car parking plan should be reviewed in light of the need to avoid encroachment onto the SRZ of trees. This may require removal of some of the car spaces.

The car parking spaces should be designed to meet the standards of Clause 52.06-8 and the applicable Australian Standard where possible. Given the fall of the land and location of some car spaces adjacent to embankments, protective measures such as railing and wheel stops will be required for some spaces to avoid errant vehicles and to protect people alighting from cars. This should be shown on amended plans.

A bus set-down and collection area is proposed to cater for a 12 seat bus and the swept paths provided confirm that the vehicle access track can accommodate this vehicle. The use of a shuttle bus to collect customers from Lorne will reduce the demand for car parking.

Cardno estimate there will be up to 40 vehicle movements per hour at peak times, comprising 20 inbound and 20 outbound, with almost all traffic departing and arriving to/from the Lorne direction. The traffic assessment confirms that the road can readily accommodate the expected level of traffic and that there will not be extensive queuing along the road based on expected traffic movements and limits on patrons through the booking system. It is proposed to widen the site access to 6 metres to enable departing and arriving vehicles to pass.

The required sight distances at the site access point cannot be met for a 100km/h speed zone, however the observed speeds are well below the speed limits due to the bends in the road on both approaches. The 85th

³ Ecology and Heritage Partners, Targeted Wrinkled Button Surveys for 180 Erskine Falls Road, Lorne, June 2016

⁴ Ecology and Heritage Partners, Biodiversity Assessment, 180 Erskine Falls Road, Lorne, November 2016

⁵ Ecology and Heritage Partners, Minor Sports and Recreation Activity (Proposed Treetop Adventure Park), 180 Erskine Falls Road, Lorne – Aboriginal Cultural Heritage Management Plan No. 14167, May 2016

⁶ Cardno, Lorne Zip Lining Facility, 180 Erskine Falls Road, Lorne, April 2016

percentile vehicle speed along the site frontage is 57.4km/h. Council may wish to review the speed limits in this location if safety becomes an issue.

Advertising signage

No details of any advertising signage have been submitted. The RCZ places advertising signs under Category 4 - Sensitive areas of Clause 52.05. Business identification signs are listed under Section 2 – Permit required and are limited to a total advertisement area of not more than 3m² to each premises.

The application requirements of Clause 52.05-2 include that an application must be accompanied by the location of the proposed sign, the dimensions and height, and the colour, lettering style and materials of the proposed sign; in other words the size and content of the sign must be known in making and deciding an application. Therefore it is inappropriate to consider and grant open approval for signage which has not been specified. It is also inappropriate to subject a matter that requires primary approval under the planning scheme to secondary consent as a condition of permit. Any future signage that the applicant wished to display on the land would therefore be subject to a separate permit application. There is little advertising signage in this location and it is considered that any business signs should be modest and relatively discreet.

Objections

The objectors raised issues with the consistency of the proposed outdoor recreation facility with the purposes of the RCZ, off-site amenity impacts such as noise, dust, visual impact and traffic, and the precedent that approval of the application would set for other land within the RCZ.

The consistency of the proposed use and development with the purposes of the RCZ and other relevant planning policies and provisions has been discussed previously in this report, as have the potential visual and traffic impacts that may be generated by the development. Other amenity impacts and concerns around noise, dust, wastewater management, stormwater management and precedent are discussed below.

Noise

Noise outputs would need to comply with EPA publication 1411 *Noise from Industry in Regional Victoria* (NIRV) and *State Environment Protection Policy (Control of Music Noise from Public Premises) No. N-2*. Potential noise sources include vehicle movements (cars and buses), people using the outdoor adventure facilities (e.g. screaming and squealing), operation of the zip lines, and sounds emanating from the buildings (e.g. music).

An acoustic assessment has not been provided in support of the application, however it is considered that off-site amenity impacts will be limited. The subject site has only one directly abutting neighbouring property, which is Crown land along part of the northern boundary. The site is otherwise separated from surrounding land by road reserves. The dwellings on the properties to the north are located approximately 80m (135 Grove Road) and 125m (115 Grove Road) from the site's northern boundary. The large private property to the south is vacant. Lorne's industrial estate is located 200m to the east of the site. The number of visitors on-site using the facilities will be managed through an online booking system. Any amenity impacts will be able to be mitigated through appropriate permit conditions, including conditions to ensure noise emissions are contained to an acceptable level in accordance with the relevant EPA policies, general amenity conditions and restrictions to opening hours.

Dust

It is not considered that there would be any dust issues as a result of construction and ongoing operation of the facility. The proposal does not require any significant earthworks, other than grading of the access track and car parking spaces.

Night illumination

The proposed hours of operation do not involve use into the middle or late evening at any time of the year. Consequently, there will not be a significant impact associated with lighting. Permit conditions restrict the opening hours of the facility to daylight hours and a condition is proposed that requires any external lighting to be designed, baffled and located so as to prevent any adverse effect on adjoining land.

Wastewater

It is proposed to collect, treat and store wastewater using a waterless composting toilet system with a zero discharge storage tank. This system is a fitting alternative where traditional effluent disposal systems are unsuitable. The subject site has a shallow soil profile and moderate to steep slope, making it less suitable for effluent disposal via absorption trenches or evaporation areas. The system has been designed and sized to accommodate the expected patron and staff numbers, including peak loads. It is considered that the proposed wastewater management is acceptable and will not result in any adverse environmental impacts.

Stormwater

Stormwater runoff from the site should be directed to tanks to provide a potable supply for the site. Any overflow can be discharged to the table drain in Erskine Falls Road.

Precedent

One objector is concerned that the proposal will set a precedent for development in other areas within the RCZ, such as Bells Beach. As is commonly found by responsible authorities, VCAT and Planning Panels, each permit application must be assessed on its own merits having regard to the specific site context and physical setting and the planning outcomes articulated for an area in policy. The MSS strongly discourages development within the viewshed of the Bells Beach Surfing Recreation Reserve.

CONCLUSION

On balance the application is considered to result in an outcome that is strongly supported by state and local planning policy and will result in net community benefit by making a positive contribution to the growth and sustainability of the Lorne visitor economy and experience.

The proposal is consistent with planning policies and tourism strategies that encourage nature and adventure based tourism in the Lorne hinterland and Otway Ranges/Great Ocean Road Region, whilst providing for the protection of environmental and landscape values and management of bushfire risk.

It is recommended that a permit be granted for Use and Development of the Land for an Outdoor Recreation Facility and Removal of Native Vegetation subject to conditions.

ATTACHMENT – BUSHFIRE PROVISIONS ASSESSMENT

Updated as at VC109

Clause 52.47-2 Bushfire Protection for all other applications

| Measure | Requirement | Proposal | Complies |
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| 52.47-2.1 Landscape, siting and design objectives <ul style="list-style-type: none"> Development is appropriate having regard to the nature of the bushfire risk arising from the surrounding landscape. Development is sited to minimise the risk from bushfire. Development is sited to provide safe access for vehicles, including emergency vehicles. Building design minimises vulnerability to bushfire attack. | | | |
| AM 2.1 | The bushfire risk to the development from the landscape beyond the site can be mitigated to an acceptable level. | The site is not expected to be protected from the effects of a large landscape scale bushfire given the surrounding forest and topography. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| AM 2.2 | A building is sited to ensure the site best achieves the following: <ul style="list-style-type: none"> The maximum separation distance between the building and the bushfire hazard. The building is in close proximity to a public road. Access can be provided to the building for emergency service vehicles. | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| AM 2.3 | A building is designed to reduce the accumulation of debris and entry of embers. | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| 52.47-2.2 Defendable space and construction objective <p>Defendable space and building construction mitigate the effect of flame contact, radiant heat and embers on buildings.</p> | | | |
| Measure | Requirement | Proposal | Complies |
| AM 3.1 | A building used for a dwelling (including an extension or alteration to a dwelling), a dependant person's unit, industry, office or retail premises is provided with defendable space in accordance with: <ul style="list-style-type: none"> Column A, B or C of Table 2 to Clause 52.47-3 wholly within the title boundaries of the land; or If there are significant siting constraints, Column D of Table 2 to Clause 52.47-3. <p>The building is constructed to the bushfire attack level that corresponds to the defendable space provided in accordance with Table 2 to Clause 52.47-3.</p> | N/A | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| AM 3.2 | A building used for accommodation (other than a dwelling or dependent person's unit), a child care centre, an education centre, a hospital, leisure and recreation or a place of assembly is: <ul style="list-style-type: none"> Provided with defendable space in accordance with Table 3 to Clause 52.47-3 wholly within the title boundaries of the land. | N/A | Yes <input type="checkbox"/> No <input type="checkbox"/> |

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| | <ul style="list-style-type: none"> Constructed to a bushfire attack level of BAL 12.5. | | |
| Alternate Measure 3.3 | Adjoining land may be included as defendable space where there is a reasonable assurance that the land will remain or continue to be managed in that condition as part of the defendable space. | N/A | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Alternate Measure 3.4 | Defendable space and the bushfire attack level is determined using Method 2 of AS3959:2009 Construction of buildings in bushfire prone areas (Standards Australia) subject to any guidance published by the relevant fire authority | N/A | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Alternate Measure 3.5 | <p>A building used for a dwelling (including an extension or alteration to a dwelling) may provide defendable space to the property boundary where it can be demonstrated that:</p> <ul style="list-style-type: none"> The lot has access to urban, township or other areas where: <ul style="list-style-type: none"> Protection can be provided from the impact of extreme bushfire behaviour. Fuel is managed in a minimum fuel condition. There is sufficient distance or shielding to protect people from direct flame contact or harmful levels of radiant heat. Less defendable space and a higher construction standard is appropriate having regard to the bushfire hazard landscape assessment. The dwelling is constructed to a bushfire attack level of BAL FZ. This alternative measure only applies where the requirements of AM 3.1 cannot be met. | N/A | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Alternate Measure 3.6 | <p>A building used for accommodation (other than a dwelling or dependent person's unit), child care centre, education centre, hospital, leisure and recreation or place of assembly may provide defendable space in accordance with Column A, B or C of Table 3 to Clause 52.47-3 where it can be demonstrated that:</p> <ul style="list-style-type: none"> An integrated approach to risk management has been adopted that considers: <ul style="list-style-type: none"> The characteristics of the likely future occupants including their age, mobility and capacity to evacuate during a bushfire emergency. The intended frequency and nature of occupation. The effectiveness of proposed emergency management arrangements, including a | <p>The proposal seeks to rely on this alternative measure through an integrated approach to risk management that includes:</p> <ul style="list-style-type: none"> varied defendable space requirements varied vegetation management standards Application of a Bushfire Emergency Management Plan (BEMP) as the primary means of bushfire safety for people using the site. The site will be closed on days of elevated bushfire danger and visitors and staff will be evacuated to Lorne in the event of a bushfire on or near the site. Buildings to be constructed to BAL-29, noting that these | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

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| | <p><i>mechanism to secure implementation.</i></p> <ul style="list-style-type: none"> ▪ <i>Less defensible space and a higher construction standard is appropriate having regard to the bushfire hazard landscape assessment.</i> | <p>buildings will not be permanently occupied and are not intended to provide refuge during a fire. The loss of buildings and site infrastructure is anticipated.</p> | |
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52.47-2.3 Water supply and access objectives

A static water supply is provided to assist in protecting property. Vehicle access is designed and constructed to enhance safety in the event of a bushfire.

| Measure | Requirement | Proposal | Complies |
|---------|---|--|---|
| AM 4.1 | <p><i>A building used for a dwelling (including an extension or alteration to a dwelling), a dependant person's unit, industry, office or retail premises is provided with:</i></p> <ul style="list-style-type: none"> ▪ <i>A static water supply for fire fighting and property protection purposes specified in Table 4 to Clause 52.47-3.</i> ▪ <i>Vehicle access that is designed and constructed as specified in Table 5 to Clause 52.47-3.</i> <p><i>The water supply may be in the same tank as other water supplies provided that a separate outlet is reserved for fire fighting water supplies.</i></p> | N/A | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| AM 4.2 | <p><i>A building used for accommodation (other than a dwelling or dependent person's unit), child care centre, education centre, hospital, leisure and recreation or place of assembly is provided with:</i></p> <ul style="list-style-type: none"> ▪ <i>A static water supply for fire fighting and property protection purposes of 10,000 litres per 1,500 square metres of floor space up to 40,000 litres.</i> ▪ <i>Vehicle access that is designed and constructed as specified in Table 5 to Clause 52.47-3.</i> ▪ <i>An integrated approach to risk management that ensures the water supply and access arrangements will be effective based on the characteristics of the likely future occupants including their age, mobility and capacity to evacuate during a bushfire emergency.</i> <p><i>The water supply may be in the same tank as other water supplies provided that a separate outlet is reserved for fire fighting water supplies.</i></p> | <p>162,000L tank proposed with separate outlet provided for fire fighting in an accessible location.</p> <p>The vehicle access track provides access for emergency vehicles in compliance with CFA requirements.</p> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |