Bushfire Hazard Assessment Kingscliff Ambulance Station







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Prepared for: Health Infrastructure

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Bushfire Disclaimer

This report in no way suggests or guarantees that a bushfire or grass fire will not occur at the Project Site and/or impact the proposed development. This report advises on matters published by the NSW Rural Fire Service in the guideline Planning for Bushfire Protection 2019 and other advice available from that organisation. Due consideration has been given to site conditions and to appropriate legislation and documentation available at the time of writing. The report is therefore current at the time of writing only.

Certification

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Executive Summary

GeoLINK has been engaged by Health Infrastructure (HI) to prepare a Bushfire Hazard Assessment for a new ambulance station at Kingscliff (the project). The new ambulance station is to be located on land described as Lot 11 DP1269398, 771 Cudgen Road, Cudgen (the site). This is the site of the new Tweed Valley Hospital, which is currently under construction.

The proposed development includes a two-storey emergency services facility (ambulance station), with proposed access via Turnock Street.

The proposed ambulance station is defined as an emergency services facility. The building is consistent with the definition of a Class 5 and 7a building under the Building Code of Australia. The proposed development is classed as 'other development' under Planning for Bushfire Protection 2019 (PBP). Therefore, the requirements of Section 8.3.1 of PBP have been considered as part of the proposed development assessment.

This Bushfire Hazard Assessment has been prepared in accordance with the requirements of PBP. The assessment demonstrates bushfire protection measures are available to manage potential hazard vegetation to the north.



1. Introduction

1.1 Scope and Purpose

GeoLINK has been engaged by Health Infrastructure (HI - the proponent) to prepare a Bushfire Hazard Assessment for a new ambulance station for Kingscliff. The site is located at 771 Cudgen Road, Cudgen on the Far North Coast of NSW (refer to **Illustration 1.1**).

The proposed ambulance station is defined as an 'emergency services facility' under provisions of State Environmental Planning Policy (Transport and Infrastructure) 2021 which means:

'a building or place (including a helipad) used in connection with the provision of emergency services by an emergency services organisation...'

The definition of an emergency services organisation includes the Ambulance Service of New South Wales. Under the provisions of the Tweed Local Environmental Plan (LEP) 2014 the site is zoned SP2 Special Purposes Zone – Infrastructure (Health Services Facility) and DM (Deferred Matter – which defaults to the zones under the Tweed LEP 2000). The proposed ambulance station is located in the SP2 Special Purposes Zone – Infrastructure zone.

Pursuant to Clause 2.51(2) of T&ISEPP, emergency service facilities development may be carried out with consent by or on behalf of a public authority on any land, including land zoned SP2 Infrastructure.

Pursuant to Clause 2.52(1) of T&ISEPP, emergency service facilities may be carried out by or on behalf of a public authority without consent in a prescribed zone. The SP2 Infrastructure zone is a prescribed zone as defined under Clause 2.49 of T&ISEPP. Clause 2.52(2) of T&ISEPP does not apply to the new development as the facility will not be a single storey building and will provide parking for more than two ambulances.

The planning approval pathway is development without consent under Part 5 of the *Environmental Planning and Assessment Act* and pursuant to Clause 2.52(1) of T&ISEPP. Part 5 Activities involve the preparation of an environmental assessment (referred to as a Review of Environmental Factors) that assesses the environmental impact of the proposal. Health Infrastructure are the relevant public authority to approve the Review of Environmental Factors.

The proposal is <u>not</u> considered special fire protection purpose (SFPP) development under the *Rural Fire Act 1997* and PBP.

This Bushfire Hazard Assessment has been prepared to accompany the Review of Environmental Factors for the proposed development.

Within the context of PBP, the building is consistent with the definition of a Class 5 and 7a building under the Building Code of Australia. The proposed development is classed as 'other development' under PBP and Section 8.3.1 of PBP applies and AS 3959-2019 does not apply. The aim and objectives of PBP apply in relation to other matters such as access, water and services, emergency planning and landscaping/ vegetation management.

This Bushfire Hazard Assessment addresses the requirements of Section 8.3.1 and Appendix 2 of PBP and Section 4.14 of the EP&A Act.

This report serves to:

- identify the site and proposed development;
- determine the bushfire threat; and
- identify precautions required to improve the chances of building survival in the event of a bushfire.



1.2 Legislative Framework

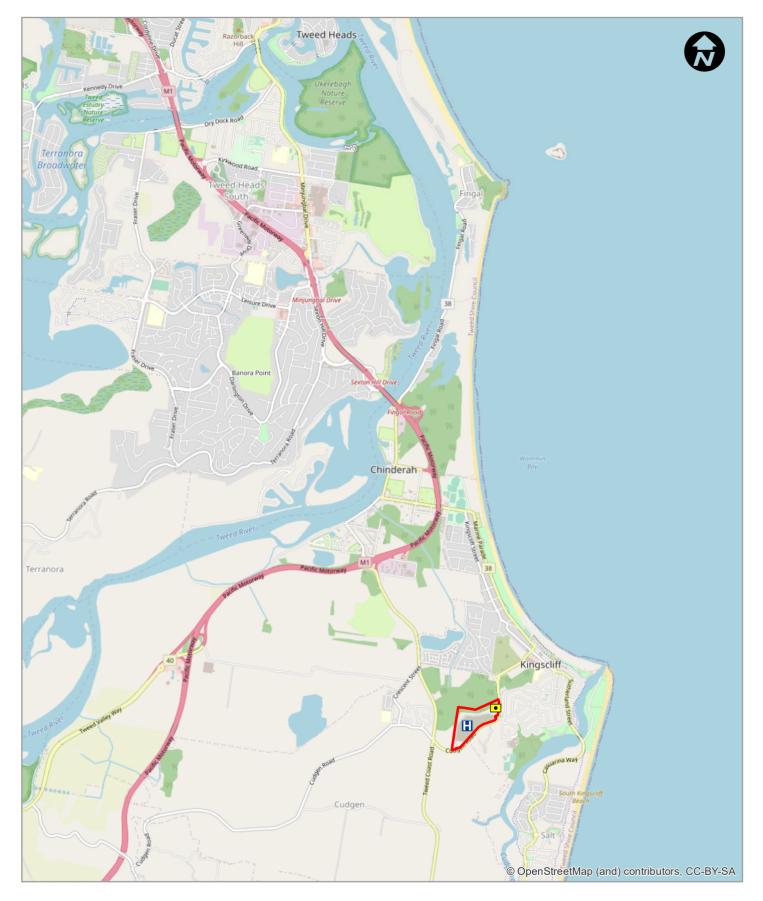
The assessment contained in this report has been prepared with regard to:

- Environmental Planning and Assessment Act 1979
- Environmental Planning and Assessment Regulation 2000
- Rural Fires Act 1997
- Rural Fires Regulation 2013
- Building Code of Australia (Volume 2)
- Planning for Bushfire Protection 2019 (PBP)

The *Rural Fires Act 1997* and the EP&A Act institute a framework for environmental planning and assessment to consider bushfire hazard issues.

1.3 Bushfire Prone Land

Tweed Shire Council's bushfire prone land (BPL) mapping has been prepared as a requirement of Section 10.3 of the EP&A Act and in accordance with the NSW Rural Fire Services (RFS) 'Guideline to Bushfire Prone Land Mapping'. Council's mapping shows the northern portion of the site as being buffer to category 1 vegetation (refer to **Illustration 1.2**).



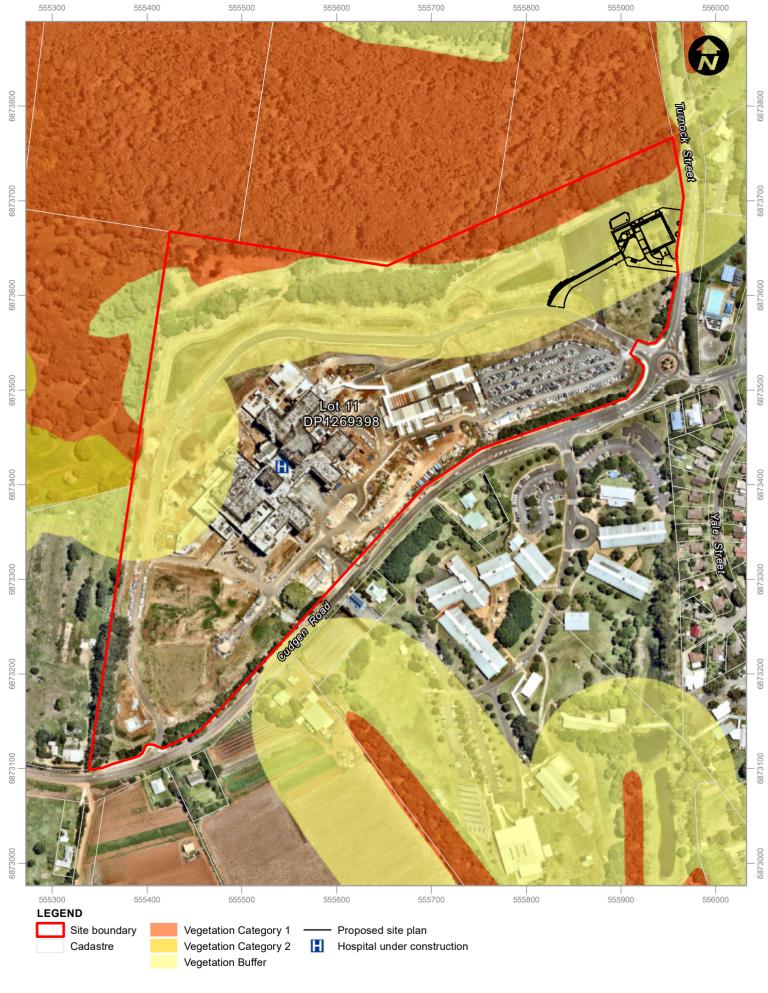
LEGEND

Site boundary

Hospital under construction

Proposed ambulance station









2. Background

2.1 Location and Description

The site is located on 771 Cudgen Road, Cudgen on the Far North Coast of NSW, within the grounds of the new Tweed Valley Hospital. **Table 2.1** provides a brief description of the site and its location.

Table 2.1 Site Detail Summary

Site Details	
Lot/DP	Lot 11 DP1269398
Street address	771 Cudgen Road, Cudgen NSW 2487 (with proposed access via Turnock Street)
Effective slope	Flat
Site elevation	5-20 m AHD
Development footprint elevation	6- 15 m AHD
Site area	19.38 ha
Development footprint area	0.35 ha
Tweed LEP 2014 Zoning	SP2 Special Purposes Zone – Infrastructure zone
Fire weather area	North Coast
Forest Fire Danger Index (FFDI)	80
Fire control centre	Far North Coast (Murwillumbah)

2.2 Zoning and Land Use

The site slopes down, away from Turnock Street, with elevations ranging from 20 m AHD to 6 m AHD. The sloping nature of the site has informed the decision to construct a two-storey ambulance station. The site was formerly utilised for agricultural purposes, however there is some vegetation present at the rear of the ambulance station footprint, and along the road frontage. Some trees from a dis-used orchard would be removed.

Most of the site is zoned SP2 Special Purpose Zone – Infrastructure (Health Services Facility), with the northern fringe zoned DM (Deferred Matter) under the Tweed LEP 2014. The DM area along the site's northern fringe is mapped as Coastal Wetlands under the Statement Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021 and is largely zoned 7(I) Environmental Protection (Habitat), along with smaller slivers of 2(c) Urban Expansion and 1(b1) Agricultural Protection pursuant to the Tweed LEP 2000 (which applies to DM areas). The footprint of the proposed ambulance station is contained within the SP2 zoned area of the Tweed LEP 2014.

Construction of Tweed Valley Hospital is subject to a State Significant Development consent and works are due to be completed in 2023. Other land uses in proximity to the site include the Kingscliff Swimming Centre, the Kingscliff Community Health Centre and the Kingscliff TAFE College.



Plate 2.1 View north along Turnock Street towards location of proposed ambulance station



Plate 2.2 View south along Turnock Street showing existing vegetation



Plate 2.3 View west showing location of proposed ambulance station and construction of Tweed Valley Hospital in background with hazard vegetation to northwest (RHS)



Plate 2.4 View north of proposed ambulance station showing orchard vegetation to be removed

2.3 Proposed Development

HI propose to construct a new ambulance station, carpark and associated facilities within the site of the Tweed Valley Hospital on an area previously used as a custard apple orchard in the north-eastern portion of Lot 11 DP1269398. The new two-storey ambulance station will include:

- Access to the ground floor off Turnock Street.
- Access to lower ground floor off the Hospital Link Road.
- Ground floor plant room providing eight ambulance parking bays.
- Lower ground floor car parking, providing 14 parking bays, including one PWD space.
- Operations rooms, split across the lower and ground levels (connected by internal stairs) including offices, meeting room, medical store, delivery room, amenities, lockers, gym, kitchen, dining, common room, and sleeping pods.
- Outdoor hardstand area accommodating fire hydrant tanks, fire hydrant, electrical substation, rainwater tank, outdoor seating area.
- Waste storage area.



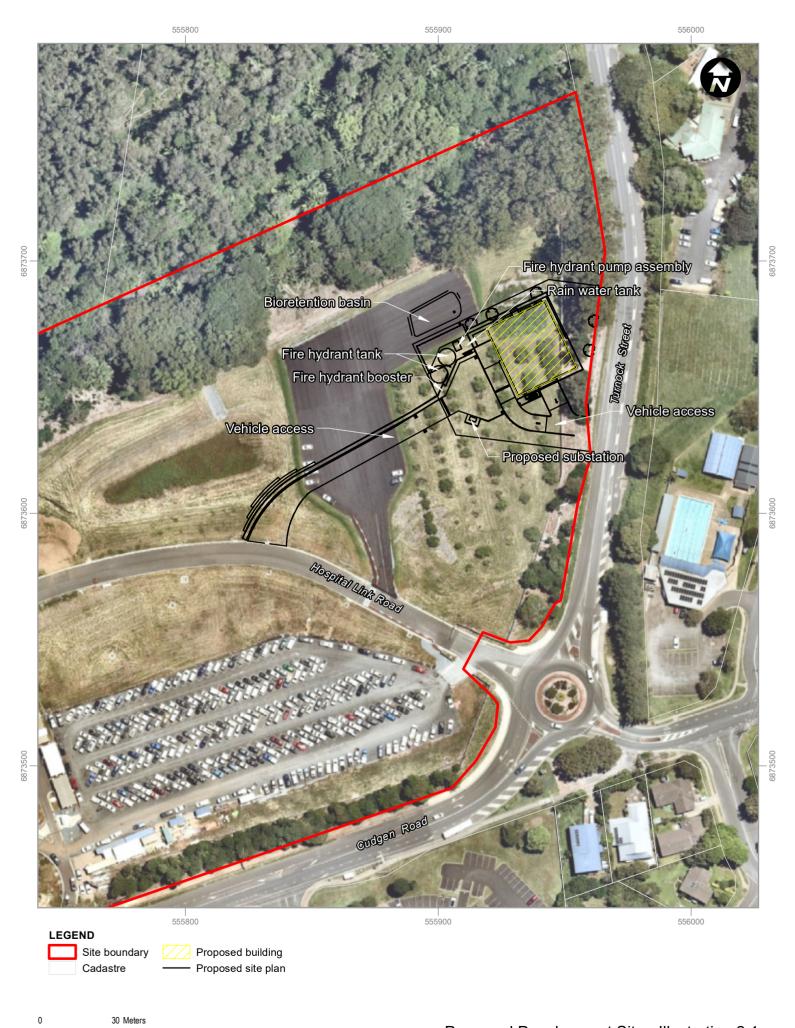
The activity includes utility adjustments, storm water infrastructure, essential services connections, solar power units, establishing and decommissioning of a temporary site compound, erosion and sediment controls, internal traffic/ pedestrian management and site stabilisation at the completion of works.

The proposed development will also involve removal of some orchard trees to enable construction of the building and access. Plans for the development are attached as **Appendix A**. Siting of the proposed development is shown at **Illustration 2.1**.

The building is consistent with the definition of a Class 5 and 7a building under the Building Code of Australia which means:

Class 5 - an office building used for professional or commercial purposes excluding class 6, 7, 8 and 9 buildings.

Class 7a - buildings that is used for the parking of motor vehicles.





3. Planning for Bushfire Protection Assessment

3.1 Bushfire Assessment

The following subsections were informed by a site visit undertaken by GeoLINK on 11 February 2022 to confirm slope, vegetation, access and general site features relevant to the assessment of the development.

3.1.1 Vegetation

The proposed ambulance station is to be located partially within the site of a previous custard apple orchard (refer to **Plate 2.1** to **Plate 2.4**). The site predominantly consists of cleared/ cultivated land which is under construction for Tweed Valley Hospital with extensive Swamp Sclerophyll Forest to the north. A planted/ landscaped edge of a mixture of native and exotic vegetation occurs along Turnock Street to the east. Tweed Shire online vegetation mapping depicts the vegetation to the north as Broad-leaved Paperbark Closed Forest to Woodland.

The Swamp Sclerophyll Forest to the north is likely to be consistent with the Threatened Ecological Community (TEC) Swamp oak floodplain forest of the NSW North Coast, Sydney Basin and South East Corner bioregions listed under the Biodiversity Conservation (BC) Act 2016 and listed as Endangered under the Environment Protection Biodiversity Conservation (EPBC) Act 1999 as Coastal Swamp Oak (Casuarina glauca) Forest of South-east Queensland and New South Wales. It is also mapped as Coastal Wetland.

Vegetation surrounding the site has been assessed in terms of potential fire hazard over a distance of 140 m, using the formation classes provided within Section A1.2 of PBP. Dominant vegetation formations in each relevant direction from the proposed building envelope are provided in **Table 3.1**.

Table 3.1 Predominant PBP Vegetation Classes from Building Footprint

Direction	Predominant Vegetation Class	Separation Distance
North	Coastal Swamp Forest	37 m
South	Managed Land	-
East	Managed Land	-
West	Managed Land	-

3.1.2 Slope

The effective slope is that slope within the hazard which most significantly affects fire behaviour having regard to the vegetation class. The effective slope for the proposal has been assessed over 100 m. The proposed ambulance station is to be built at RL 15100. The site slopes down to the Coastal Swamp Forest and the northern boundary at 2 m AHD. The Coastal Swamp Forest however is very flat and low lying. The effective slope in relation to the development is presented in **Table 3.2**.



Table 3.2 Effective Slope

Direction	Effective Slope Category (Degrees)
North	Upslope/Flat
South	-
East	-
West	-

3.1.3 Bushfire Attack Levels

As previously noted, the proposed ambulance station conforms with building class 5 and 7a, as such Section 8.3.1 of PBP applies. Section 8.3.1 of PBP states that *The NCC (National Construction Code)* does not provide for any bush fire specific performance requirements for these particular classes of buildings. As such AS 3959 and the NASH Standard are not considered as a set of Deemed to Satisfy provisions, however compliance with AS 3959 and the NASH Standard must be considered when meeting the aims and objectives of PBP.

The general fire safety construction provisions of the NCC are taken as acceptable solutions **however** construction requirements for bush fire protection will need to be considered on a case-by-case basis.

Table 3.3 Calculated Bushfire Attack Levels

Direction	Dominant Vegetation Formation	Slope Category	Separation Distance (m)	BAL
North	Coastal Swamp Forest	Upslope/Flat	30	BAL-19
South	Managed Land	-	-	BAL-12.5*
East	Managed Land	-	-	BAL-19*
West	Managed Land	-	-	BAL-19*

^{*} Section 3.5 of AS 3959-2018 states that where an elevation is not exposed to the source of bushfire attack, then the construction requirements for that elevation can reduce to the next lower BAL. However, it shall not reduce below BAL 12.5. The shielding of an elevation shall apply to all the elements of the wall, including openings, but shall not apply to subfloors or roofs.

In order to meet the aims/ objectives of PBP, separation (i.e. APZ) should therefore be provided in combination with other measures (i.e. construction). Hence it is recommended that a 29 m APZ be provided to the north in combination with BAL 19 construction.

3.1.4 Development Siting

The proposed two-storey ambulance station will be sited away from ridge-tops and steep slopes, not located within a saddle or narrow ridge crest. It will be surrounded by hard stand and a managed separation will be maintained between the building and the hazard to the north. It will have a short access driveway to the south/ south-east away from the hazard.

3.1.5 Fire (Weather Area)

In accordance with PBP, Tweed Shire Council is located within the 'North Coast' fire area, with a Fire Danger Index (FDI) rating of 80.



3.1.6 Asset Protection Zones

Asset Protection Zones (APZ) requirements have been calculated based on the effective slope, vegetation formations and FDI rating (refer to **Table 3.4**).

Table 3.4 APZ Requirements

Direction	Slope	Vegetation	APZ (m)
North	Upslope/Flat	Coastal Swamp Forest	29
South	-	Managed Land	-
East	-	Managed Land	-
West	-	Managed Land	-

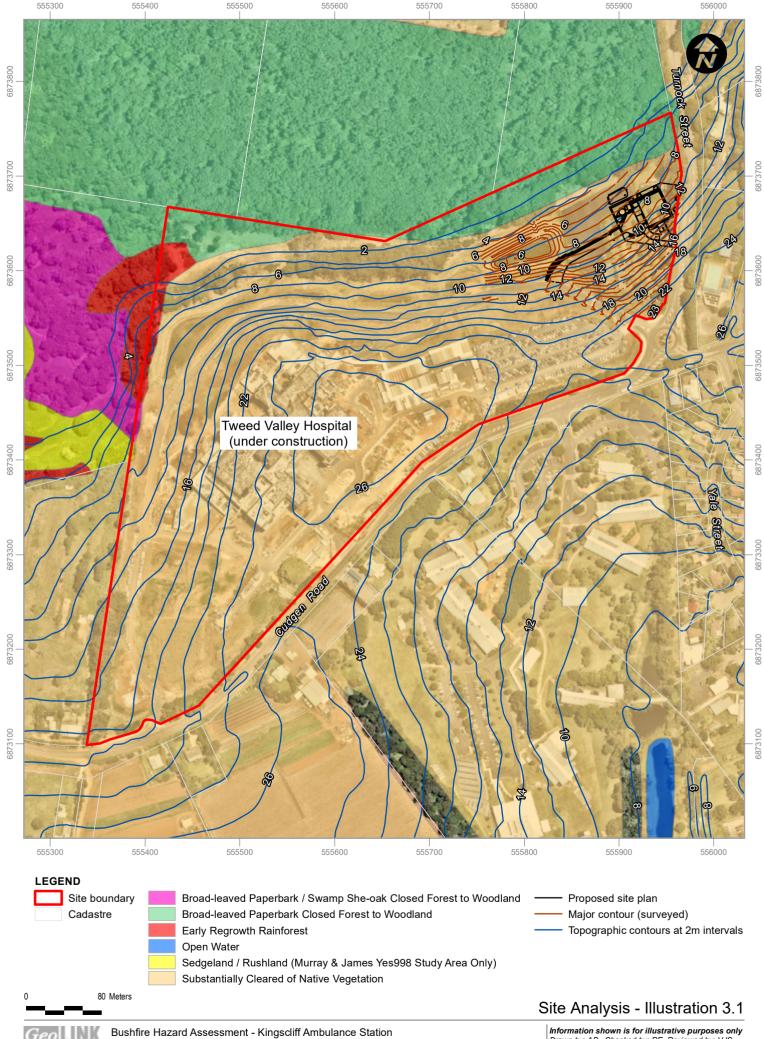
As the proposed development is an infill arrangement, site constraints do not allow the calculated APZ requirements to be met. A separation distance of 30 m from the proposed building envelope to the edge of the hazard vegetation to the north however can be achieved. It is recommended that a 29 m APZ be managed to provide a defendable space and meet the aims/ objectives of PBP.

3.1.7 Access

The proposed two-storey building will be accessed via a short driveway from Turnock Street to the south/ south-east of the site. Access will also be available to the west connecting with the Hospital Link Road hence multiple access/ egress is available away from the hazard vegetation in the north.

3.1.8 Services

The site has access to reticulated water and power. The development includes provision of a substation, rain water tank, fire hydrant tank, fire hydrant booster and fire hydrant pump assembly.





3.2 Bushfire Protection Measures

PBP identifies that applications for developments that are not residential/ rural residential subdivisions, SFPPs or residential infill should:

- satisfy the aim and objectives of PBP
- consider any issues listed for Class 5 and 7a buildings in accordance with PBP Section 8.3.1
- propose an appropriate combination of bushfire protection measures.

Section 8.3.1 of PBP identifies that the NCC does not provide for any bushfire specific performance requirements for class 5 to 8 buildings and as such AS 3959-2019 and the NASH Standard are not considered as a set of 'deemed to satisfy' provisions. The general fire safety construction provisions are taken as acceptable solutions, but the aim and objectives of PBP apply in relation to other matters such as access, water and services, emergency planning and landscaping/ vegetation management.

In accordance with Section 8.3.1 of PBP the bushfire protection measures and requirements for 'other development' are considered in **Table 3.5**.

Table 3.5 Section 8.3.1 of PBP Considerations

PBP Aims and Consideration **Objectives** AIM: Provide for the The combination of bushfire protection measures proposed provide for protection of human life protection of human life and minimise impacts on property. These and minimise impacts include: on property from the Adequate access/ egress to the east, south-west and south away threat of bushfire, while from the bushfire hazard to the north. having due regard to Land uses that comprise managed land are located to the east, development potential, west and south. site characteristics and The proposed ambulance station will create shielding from the protection of the hazard to the north for evacuees exiting the site to the south. environment. A 29 m APZ will be managed between the proposed ambulance station and the hazard vegetation to the north. It is acknowledged that only 7 m of this will be located within the development footprint. Large areas of hard-stand for parking. Reticulated water supply available to site with tanks, hydrants and booster located adjacent to the proposed building envelope. BAL-19 construction is recommended on the northern, eastern and western facades with BAL-12.5 on the southern. Objective (i): to provide Access to the ground floor of the proposed ambulance station will safe access to/ from the be directly from Turnock Street via an approximately 25 m long public road system for sealed driveway. firefighters providing Turnock Street is a two lane, sealed public road aligned north-south joining McPhail Avenue at a roundabout intersection approximately property protection during a bushfire and 80 m south. Access to the lower ground floor of the proposed ambulance station for occupant egress for will be off the Hospital Link Road to the west. The Hospital Link evacuation; Road also joins the Turnock Street/ Cudgen Road/ McPhail Avenue intersection. These accesses are located away from the bushfire hazard. The ambulance station footprint shall be managed as an IPA in accordance with PBP. Traffic management devices will not prohibit access to fire fighting vehicles. Objective (ii): to provide Safe and orderly evacuation can be achieved via the access/ suitable emergency and egress driveways connecting onto Turnock Street to the south-east evacuation (and or the Hospital Link Road. relocation)

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PBP Aims and Objectives	Consideration
arrangements for occupants of the development;	 Tweed Valley Hospital is being constructed to BAL-12.5 and meets the bushfire protection requirements of an SFPP development of PBP. The ambulance station footprint shall be managed as an IPA in accordance with PBP.
Objective (iii): to provide adequate services of water for the protection of buildings during and after the passage of bushfire, and to locate gas and electricity so as not to contribute to the risk of fire to a building; and	 The site has access to reticulated water and power. Rain water tank, fire hydrant tank, fire hydrant booster and fire hydrant pump assembly will be located north-west of the proposed ambulance station. Water supply will be provided for the development in accordance with Section 5.3.3 of PBP. Electrical and gas services will be provided for the development in accordance with Section 5.3.3 of PBP.
Objective (iv): provide for the storage of hazardous materials away from the hazard wherever possible.	 Hazardous materials such as gas services will be located away from the bushfire hazard. Electrical and gas services will be provided for the development in accordance with Section 5.3.3 of PBP.

4. Recommendations and Conclusion

4.1 Recommendations

It is recommended that the following bushfire protection measures are applied to the proposed development:

- Asset protection zones:
 - The ambulance station footprint will be managed as an IPA in accordance with PBP.
 - A 29 m APZ will be managed to the north between proposed ambulance station footprint and the swamp forest bushfire hazard.

Services:

- Water supply will be provided for the development in accordance with Section 5.3.3 of PBP.
- Electrical and gas services will be provided for the development in accordance with Section 5.3.3 of PBP.

Construction:

BAL-19 construction is recommended on the northern, eastern and western facades with BAL 12.5 on the southern facade in order to meet the aims/ objectives of PBP.

4.2 Conclusion

The proposed development is for a new two-storey ambulance station for the Kingscliff area. The new ambulance station will be located on 771 Cudgen Road, Cudgen, the site of the new Tweed Valley Hospital, which is currently under construction with access via Turnock Street.

The proposed development is classed as 'other development' under PBP and the requirements of Section 8.3.1 of PBP apply to the assessment of the development.

This Bushfire Hazard Assessment has taken into consideration the proposed development layout, existing vegetation, effective slope, local bushfire risk conditions and FDI detailed within PBP. The proposed development is able to achieve acceptable bushfire protection measures.

It is recommended that the proposed development is approved and conditioned with consideration of the recommendations provided within this assessment.

Prepared by:

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Standards Australia (2018). *Construction of buildings in bushfire-prone areas, AS 3959.* Standards Australia International Ltd, Sydney.

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This assessment has been based on the proposed designs provided at **Appendix A**. Any variation to the designs presented in this report have potential to vary the findings of this assessment.

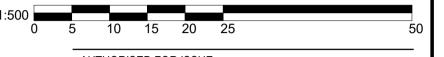
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Appendix A Plans





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	OFF DATE		
Е	25.02.22	REF ISSUE	M
D	11.02.22	FOR COORDINATION	M
С	28.01.22	BASE ARCHITECTURE SET	M
В	20.01.22	FOR COORDINATION	M
Α	22.12.21	BASE ARCHITECTURE SET	M
ISSUI	E DATE	SUBJECT	VAL

