BUSHFIRE HAZARD ASSESSMENT

ADDITIONAL SHORT-TERM CARAVAN AND CAMPING SITES

DAWSON RIVER CARAVAN PARK

LOT 1 DP 1243974 No. 1 MANNING RIVER DRIVE TAREE

> CLIENT: SPRENT PTY LTD

NOVEMBER 2023

This report has been prepared by David Pensini – Building Certification and Environmental Services with all reasonable skill, care and diligence for Sprent Pty Ltd.

The information contained in this report has been gathered from discussions with representatives of Sprent Pty Ltd, a review of the plans provided on behalf of the Sprent Pty Ltd and their representatives and experience.

No inspection or assessment has been undertaken on other aspects of the proposed development outside the scope of this report.

This report does not imply, nor should it be implied, that the proposed building design will comply fully with relevant legislation.

The report shall not be construed as relieving any other party of their responsibilities or obligations.

David Pensini – Building Certification and Environmental Services disclaims any responsibility Sprent Pty Ltd and others in respect of any matters outside the scope of this report.

The report is confidential, and the writer accepts no responsibility of whatsoever nature, to third parties who use this report, or part thereof is made known. Any such party relies on this report at their own risk.

For and on behalf of David Pensini – Building Certification and Environmental Services

Prepared by: David Pensini

Signed:

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TABLE OF CONTENTS

1.0 INTRODUCTION	6
2.0 OBJECTIVES	7
3.0 LEGISLATIVE FRAMEWORK	
3.1 Objectives for Special Fire Protection Purpose (SFPP) Developments 3.2 Caravan Parks as SFPP Development	
3.2.1 Development of Existing SFPP Facilities	9
4.0 LOCATION DESCRIPTION	11
5.0 PROPOSED DEVELOPMENT	22
6.0 BUSHFIRE HAZARD ASSESSMENT	23
6.1 Assessment Methodology	23
6.2 Hazard Identification	
6.3 Slope Assessment	
6.4 Vegetation Assessment	
6.5 Fire Danger Index	
6.6 Fauna and Flora Issues	33
7.0 BUSHFIRE THREAT REDUCTION MEASURES	34
7.1 NSW Rural Fire Services, Planning for Bushfire Protection, 2019	34
7.1.1 Provision of Defendable Space/Asset Protection Zone	
7.1.2 Defendable Space/Asset Protection Zone Management	
7.1.3 Operational Access and Egress	
7.1.4 Services - Water, Gas and Electricity	
7.1.5 Landscaping	
7.1.6 Emergency Evacuation Planning	
7.2 Construction of Buildings in Bushfire Prone Areas	41
7.2.1 General	
7.2.2 Construction of Buildings in Bushfire Prone Areas	
7.3 Consistency with PfPB 2019 Performance Objectives	41
8.0 SUMMARY OF REQUIREMENTS	45
9.0 RECOMMENDATIONS	46
10.0 CONCLUSION	47
10.1 Assumptions	47
10.2 Limitations	

- **APPENDIX 1 Subject Site**
- **APPENDIX 2 Existing Caravan Park Development**
- **APPENDIX 3 Proposed Development**
- **APPENDIX 4 APZ Compliance Concept**
- **APPENDIX 5 Existing Fire Services**
- **APPENDIX 6 Extracts From Existing Evacuation Plan**

1.0 INTRODUCTION

As requested, a Bushfire Hazard Assessment has been carried out for the provision of additional short-term caravan and camping sites within the Dawson River Caravan Park which is located on land known as Lot 1 DP 1243974, 1 Manning River Drive, Taree.

The development proposal includes the creation of six (6) additional short-term caravan and camping sites within the existing caravan park. These sites are referred to as Sites 12, 13, 25, 56, 57 and 59.

This bushfire hazard assessment report has been prepared in order to identify the relevant bushfire threat management requirements which would be applicable to the proposed development.

This report is based on a site assessment carried out on 7th September 2023.

It is noted that additions to caravan parks are integrated development under Section 91 of the *Environmental Planning & Assessment Act, 1979* and a Special Fire Protection Purpose (SFPP) development which requires a Bushfire Safety Authority under Section 100B of the *Rural Fires Act 1997.*

This report has been prepared with all reasonable skill, care and diligence.

The information contained in this report has been gathered from field survey, experience and has been completed in consideration of the following legislation.

- Rural Fires Act 1997.
- Environmental Planning and Assessment Act 1979.
- National Construction Code (NCC).
- Council Local Environment Plans and Development Control Plans where applicable.
- NSW Rural Fire Services, Planning for Bushfire Protection, 2019.
- AS 3959-2018, Construction of Buildings in Bushfire Prone Areas.

The report recognizes the fact that no property and lives can be guaranteed to survive a bushfire attack. The report examines ways the risk of bushfire attack can be reduced where the site falls within the scope of the legislation.

The report is confidential, and the writer accepts no responsibility of whatsoever nature, to third parties who use this report, or part thereof is made known. Any such party relies on this report at their own risk.

2.0 OBJECTIVES

The objective of this report is to:

• Ensure that the proposed additional short-term sites within the existing Dawson River Caravan Park can achieve compliance with the relevant requirements for Special Fire Protection Purpose developments of Chapter 6 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019.

3.0 LEGISLATIVE FRAMEWORK

On 1st August 2002 the Environmental Planning and Assessment Act, 1979, and the Rural Fires Act, 1997, were both amended to enhance bush fire protection in NSW through the development assessment process.

In broad terms, the planning considerations provide two main steps. These involve:

(i) Strategic Planning through:

- the mapping of bush fire prone.
- determining suitable bush fire requirements during the preparation of a Local Environmental Plan/Development Control Plan; and
- the identification of the extent to which land is bushfire prone.

(ii) Development assessment through:

- obtaining a bush fire safety authority for residential or rural-residential subdivision and special fire protection purpose developments in bushfire prone areas from the Rural Fire Service (RFS); and
- seeking advice from the RFS in relation to infill and other developments in bushfire prone areas that cannot comply with the requirements of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019; and
- the application of additional requirements of the National Construction Code (NCC) in relation to construction standards for Class 1, 2, 3, 4 and some Class 9 buildings in bushfire prone areas.

It is noted that this report focuses upon the development assessment processes associated with the proposed additional short-term sites within the existing caravan park. In this regard the proposed development is an integrated development and has a requirement for a Bush Fire Safety Authority under Section 100B of the Rural Fires Act 1997.

As per the NSW Rural Fire Service's Fast Fact of 01/10 all development on bushfire prone land in NSW should comply with the bushfire protection measures identified within NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019.

This report therefore examines the relevant provisions of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 to determine the bushfire protection measures required to be implemented in conjunction with the proposed additional short-term sites on land known as Lot 1 DP 1243974, 1 Manning River Drive, Taree.

3.1 Objectives for Special Fire Protection Purpose (SFPP) Developments

It is noted that proposed additions to caravan parks are subject to compliance with the relevant Special Fire Protection Purpose (SFPP) development requirements of Chapter 6 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019.

3.2 Caravan Parks as SFPP Development

Caravan Parks are specifically identified by NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 as being SFPP development on the basis of the provision of short-

term accommodation to people who are unaware of their surroundings and the appropriate procedure to follow in the event of a bush fire. In this regard NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 provides that developments involving short-term accommodation, (six weeks or less), must meet the various performance criteria in Tables 6.8a to 6.8d of the Guideline.

Additionally, Section 6.3.1 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 provides the following commentary which is considered to be specifically relevant to the proposed development and is applicable to the determination of the relevant bushfire threat management measures for the proposed development.

- **Caravan parks** Standard type caravans and motor homes used for short-term tourist accommodation generally cannot achieve any level of construction under AS 3959 or NASH Standard. The emphasis is therefore placed on APZs and emergency management, with consideration given to leaving early and non-operation on days of elevated bush fire danger.
- **Camping** No construction requirements for tents are provided in AS 3959 or NASH Standard. Camping is permissible within the APZ of a caravan or tourist park, provided the other relevant BPMs (e.g., emergency management arrangements), are in place. Careful consideration should be given to the suitability of camping in bush fire prone areas on days of elevated bush fire danger.

3.2.1 Development of Existing SFPP Facilities

Given the existing nature of the subject caravan park it is considered that the provisions of Section 6.4 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 are relevant to the proposed development albeit that the proposed development does not involve the construction and/or installation of buildings.

The following commentary from the Guideline is relevant to the proposed development and should be considered in the context of the proposed development.

In circumstances where new building projects within existing SFPP developments are proposed, an appropriate combination of BPMs are required. This will involve the BFDB process where relevant stakeholders agree on the basis for any assessment and measures that will result in a better bush fire outcome for the proposal.

The intention for any building work occurring within an existing SFPP development is to achieve a better bush fire outcome than if the development did not proceed. Achieving this may require a combination of measures including improved construction standards, APZs and evacuation management. This may result in a level of retrofitting of existing buildings and managing other portions of the site (i.e., APZs) to ensure an improved level of bush fire protection. Intensification of the use or increase in occupancy must consider the risk to occupants and firefighters. Where practically achievable, full compliance should be provided before variations to the required BPMs are considered. Proposals that involve internal alterations only, are not subject to any specific requirements unless the proposal results in a change of use, re-purpose and/or involves an increase in occupants.

Existing services such as water supplies and access may also require upgrading.

A Bush Fire Emergency Management Plan that is consistent with the NSW RFS publication: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan, and the

Australian Standard AS 3745:2010 Planning for emergencies in facilities will be required to be prepared for the existing facility.

The specific objectives for developments within existing Special Fire Purpose Protection Developments as provided for by Chapter 6 of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019 are to:

- provide an appropriate defendable space:
- site the building in a location which ensures appropriate separation from the hazard to minimise potential for material ignition:
- provide a better bush fire protection outcome for existing buildings:
- new buildings should be located as far from the hazard as possible and should not be extended towards or situated closer to the hazard than the existing buildings (unless they can comply with section 6.8):
- ensure there is no increase in bush fire management and maintenance responsibility on adjoining landowners without their written confirmation:
- ensure building design and construction enhances the chances of occupant and building survival; and
- provide for safe emergency evacuation procedures including capacity of existing infrastructure (such as roads).

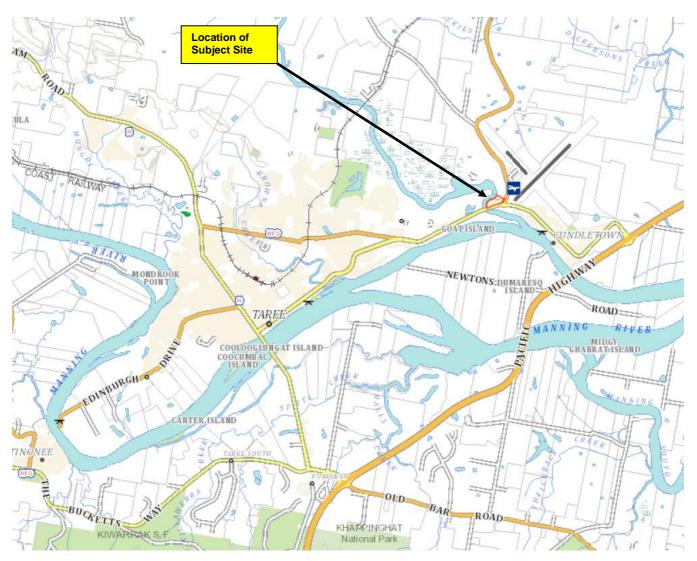
This report demonstrates that the proposed development is consistent with the above objectives together with the relevant acceptable solutions/standards which are applicable to the proposed development on the subject site.

4.0 LOCATION DESCRIPTION

The subject site is known as Lot 1 DP 1243974, 1 Manning River Drive, Taree which is situated in the Midcoast Local Government Area, which is on the Mid North Coast of NSW.

The land which is the subject of this report is located approximately 4km northeast of the Taree Central Business District (CBD) with the meander of the Dawson River defining the northern and western boundaries of the subject site, refer to **Figure 1** below.





The subject site is located within a mixed-use area with rural and other undeveloped areas of land extending to the northwest, south and west whilst light industrial and commercial development is present to the east/northeast. Infrastructure associated with the Taree Airport also extends to the east of the subject site.

The subject site comprises a single allotment of land which is irregular in shape with an area of approximately 4.3 hectares, refer to **Appendix 1**.

The subject site contains buildings, structures and infrastructure associated with the operation of the Dawson River Caravan Park, refer to **Appendix 2**, and includes:

• Thirty-three (33) Short Term Caravan and Camping Sites.

- Thirteen (13) Short Term accommodation sites with moveable dwellings.
- Sixteen (16) Long Term accommodation sites with the majority containing moveable dwellings.
- Nineteen (19) sole occupancy residential units which do not form part of the operation of the caravan park.
- Office.
- Caretakers Residence.
- Two (2) separate dwellings which do not form part of the operation of the caravan park.
- Service station and shop
- Swimming pool
- Various amenity buildings
- Internal access roads and carparking areas



Existing short-term sites in the northeastern portion of the subject site



Existing short-term sites in the western portion of the subject site



Existing short-term sites in the central portion of the subject site



Existing laundry and amenities buildings in the central portion of the subject site



Existing short-term cabins in the central southern portion of the subject site



Office and residential units in the central portion of the subject site



Residential units in the northern central portion of the subject site



Detached dwellings along the northeastern portion of the subject site



Existing craft shop and service station in the southern central portion of the subject site

A range of infrastructure, (i.e., water, sewerage, stormwater, electricity and telecommunications), necessary to support the activities undertaken at the caravan park are also present.

The topography of the subject site and surrounds provides for gentle to moderate south to north downslope conditions towards the meander of the Dawson River which is present to the north and east of the subject site with generally flat land present immediately adjacent to the banks of the river. It is noted that slope conditions transition to westerly downslopes in the far northern portion of the subject site. Slope conditions on adjacent land to the north and west is generally flat whilst slope conditions transition to easterly upslopes conditions to

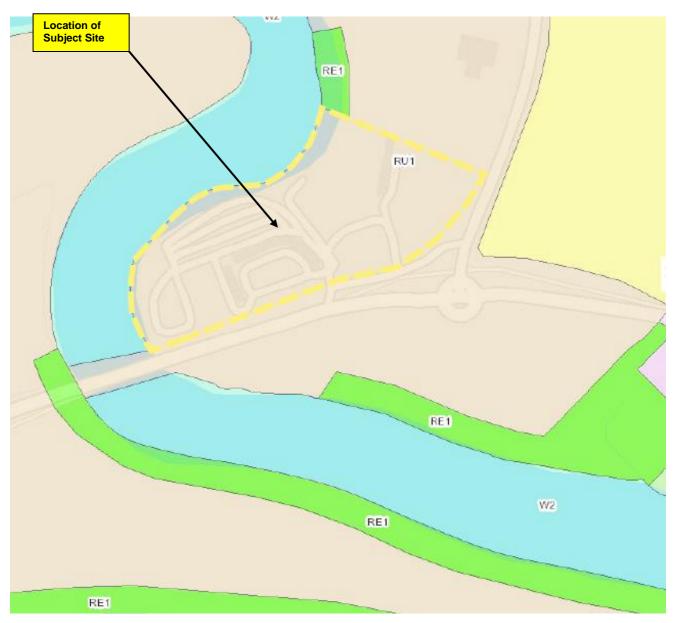
the northeast and east whilst north to south downslopes are present to the south of the subject site.

The subject site contains managed grasslands and landscaping with scattered and small clusters of trees. Grasslands associated with rural properties are present to the north and west of the subject site whilst grasslands with scattered and clusters of trees are present to the east of the subject site. It is however noted that to the northeast of the subject site is a narrow band of riparian vegetation which is present adjacent to the eastern bank of the Dawson River. It is also noted that an area of remnant highly disturbed Forested Wetland/Forest vegetation is present at distance to the northeast of the subject site.

Access to the subject site is available via an internal access road system which connects directly with Manning River Drive along the southern boundary of the subject site. Manning River Drive is an all-weather, two-way, 2-wheel drive bitumen sealed public road which connects Taree with the Pacific Highway and is a major connecting road in the area.

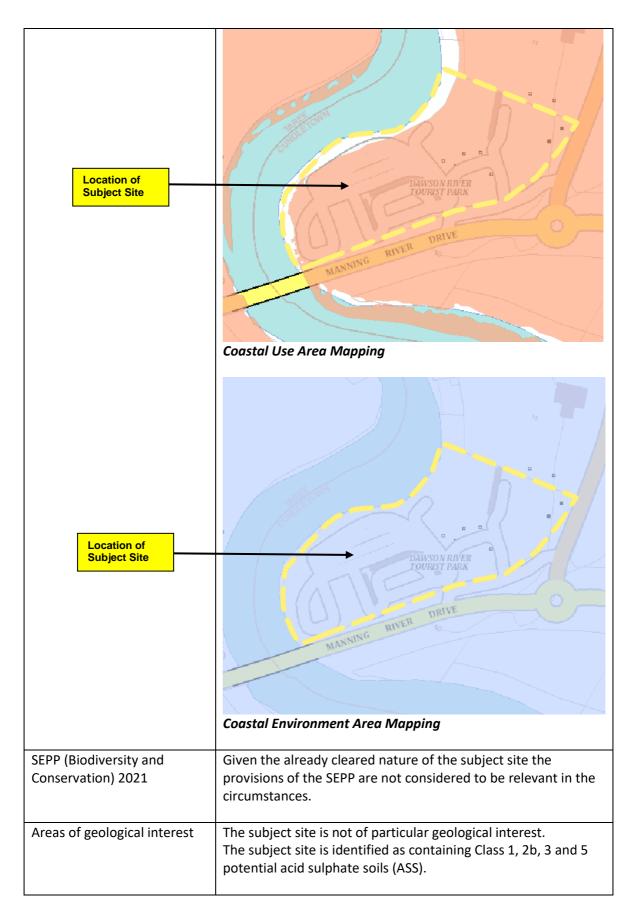
The subject site is zoned, pursuant to Greater Taree LEP, (2010), Rural – Primary Production (RU1) whilst a similar land use zoning applies to the majority of adjoining and adjacent land to the north, south and west albeit some areas of foreshore land have a Public Recreation (RE1) land use zoning. It is also noted that land to the east of the subject site has a Special Purpose (SP1) land use zoning which reflects the presence of the Taree Airport, refer to **Figure 2** below.

Figure 2 – Land Use Zoning



The environmental and heritage features of the subject site are summarized as follows;

ENVIRONMENTAL/HERITAGE FEATURE	COMMENT			
Riparian corridors	The subject site does not contain any riparian corridors.			
SEPP (Resilience and Hazards) 2021	The site of the proposed development is identified as being subject to the SEPP with the subject site located within the Coastal Environment and Coastal Use Areas of the SEPP.			



Location of Subject Site	Acid Sulphate Soils Mapping However, given the nature of the proposed development, the impacts associated with ASS are considered to be negligible.			
Environmental protection zones	The subject site does not contain any land or area with an environmental protection zoning or classification.			
Land slip	It is noted that the subject site does not involve areas which contain steep slopes and therefore land slip is not considered to be an issue for the subject site.			
Flood prone land	The subject site is identified as being within a flood planning area and accordingly the flood planning requirements of the Greater Taree LEP will be relevant to the subject site and proposed development.			
National Park Estate or other Reserves	The subject site does not form part of the National Park Estate or other Reserves.			
Threatened species, populations, endangered ecological communities and critical habitat	Threatened species, populations, endangered ecological communities and critical habitat are unlikely to be present due to the existing level of site disturbance which has occurred to date. Ecological issues are not considered to be an issue for the subject site and its future development.			
Aboriginal Heritage	Items of aboriginal heritage are unlikely to be present due to the existing level of disturbance which has occurred due to the historical development and use of the subject site.			

The closest Rural Fire Service fire control centre is located in Taree whilst the closest fire service is the Taree Fire Brigade which is located approximately 5km to the west/southwest of the subject site.

5.0 PROPOSED DEVELOPMENT

The proposed development seeks development approval for six (6) additional short-term accommodation sites within the footprint of the existing caravan park, refer to **Appendix 3**. These sites are referred to as Sites 12, 13, 25, 56, 57 and 59 within **Appendix 3**.

It is noted that the proposed additional short-term sites are located in the western and central areas of the existing caravan park with the proposed sites occupying areas of land which have had a open space use within the park.

Access to and egress from the proposed sites will be via the existing internal access road infrastructure which comprises gravel access roads which connect with the main central property access road. It is noted that the exiting internal property access road infrastructure connects with Manning River Drive which adjoins the subject site to the south.

Existing infrastructure, (i.e., water, sewerage, stormwater, electricity and telecommunications), will support the proposed short-term sites.

6.0 BUSHFIRE HAZARD ASSESSMENT

6.1 Assessment Methodology

Several factors need to be considered in determining the bushfire hazard for the subject site. These factors are slope, vegetation type and distance from hazard, access/egress and fire weather. Each of these factors has been reviewed in determining the bushfire protection measures which are applicable to the subject site and any future development.

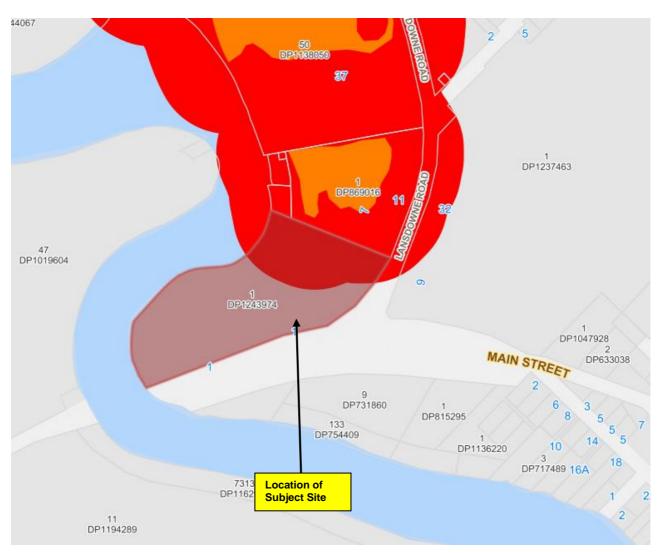
An assessment of the slopes and vegetation structures on and surrounding the subject site was carried out by David Pensini - Building Certification and Environmental Services on 7th September 2023.

The assessment of slope and vegetation being carried out in accordance with Appendix 1 of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019.

6.2 Hazard Identification

Bushfire Prone Land Risk Mapping, refer to **Figure 3** below, provides that an area of Category 1 hazard vegetation is present to the north/northeast of the subject site on adjoining land in this aspect. The subject site being within the 100m buffer zone of the Category 1 vegetation.

Figure 3 – Bushfire Prone Land Mapping



It is however noted that the mapping does not identify areas of Grassland, (Category 3), vegetation which is present to the north, west and south of the subject site nor does the mapping identify areas of riparian vegetation which are present adjacent to the banks of the Dawson River to the northwest and southwest of the subject site.

6.3 Slope Assessment

Slope is a major factor to consider when assessing the bushfire hazard of the proposed development. Therefore, the slope of the subject site and surrounding area, (to a distance of 100m), was measured using a Suunto PM-5/360 PC Clinometer.

The hazard vegetation on the subject site and adjacent and adjoining land which was relevant to the proposed development was identified and the slopes within the vegetation measured.

The topography of the subject site and surrounds provides for gentle to moderate south to north downslope conditions towards the meander of the Dawson River which is present to the north and east of the subject site with generally flat land present immediately adjacent to the banks of the river. It is noted that slope conditions transition to westerly downslopes in the far northern portion of the subject site. Slope conditions on adjacent land to the north and west is generally flat whilst slope conditions transition to easterly upslopes conditions to

the northeast and east whilst north to south downslopes are present to the south of the subject site.

The topographic features of the subject site and adjoining and adjacent land can be seen in **Figure 4** below.

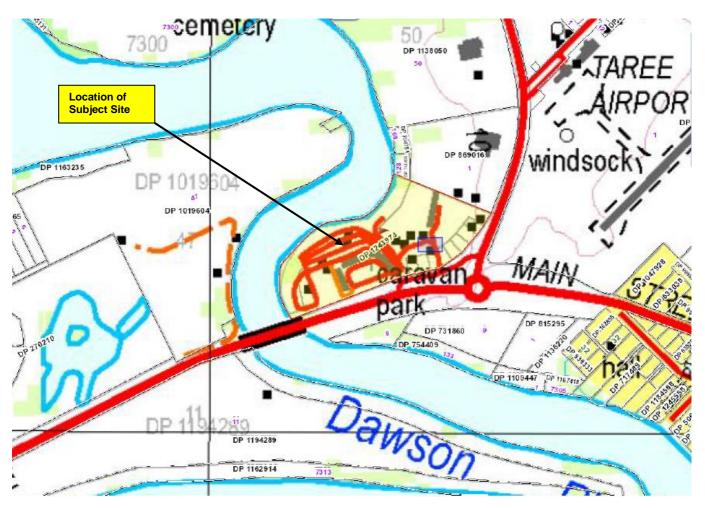


Figure 4 – Topographic Conditions of Area

The following table indicates the slopes which have been adopted for the purposes of this bushfire hazard assessment. It is noted that a conservative approach to slope assessment has been taken.

Table 2 – Haza	rd Vegetation Slopes

HAZARD ASPECT	SLOPE RANGE	UPSLOPE/DOWN SLOPE		
North	0°	Flat		
Northeast	4° - 5°	Downslope		
South	2° - 3°	Downslope		
West/Northwest	0°	Flat		

All the above slopes were considered when assessing the required bushfire threat management requirements for the subject site and proposed development.

6.4 Vegetation Assessment

The vegetation on and surrounding the subject site was assessed over a distance of 140m from the proposed development.

The vegetation formations were classified using the system adopted as per Keith (2004) and in accordance with Appendix 1 of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019.

6.4.1 Vegetation within Subject Site

The subject site contains managed grasslands and landscaping.



Managed vegetation within the Caravan Park



Accordingly, no areas of hazard vegetation are located within the subject site.

6.4.2 Vegetation on Adjoining and Adjacent Land to Subject Site

To the northeast of the subject site is an area of managed vegetation associated with a transport depot which occupies the eastern portion of the adjoining allotment to the north of the subject site. It is however noted that to the north and northwest of the subject site are areas of unmanaged grasslands with scattered and clusters of trees together with a narrow band of riparian vegetation which is present adjacent to the eastern bank of the Dawson River.

It is also noted that an area of remnant highly disturbed Forest/Forested Wetland vegetation is present at distance to the north of the subject site. Given that this area of vegetation is >140m from the proposed development this area of vegetation was not assessed as being of relevance to this assessment.

Given the highly fragmented and disconnected nature of the hazard vegetation to the north and northwest and the presence of areas of grassland which provides for fragmentation in floristic characteristics a specification similar to Rainforest was assessed as being relevant to the north-western aspect on the basis of the riparian and remnant characteristics of the vegetation in this aspect.



Managed vegetation within transport centre to the northeast of the subject site



Grasslands with scattered and clusters of trees to the north of the subject site



Narrow band of riparian vegetation to the northwest of the subject site

Remnant Forested Wetland vegetation at distance to the north of the subject site

To the south of the subject site, (beyond the Manning River Drive road reserve), is an area of grasslands before a transition to a narrow band of riparian vegetation associated with the banks of the Dawson River. Given the proximity of the areas of riparian vegetation to the southwestern portion of the existing caravan park and the significant spatial separation provided to the areas of grassland by the Manning River Drive road reserve a specification similar to Rainforest was adopted for the southern aspect in acknowledgment of the presence of the areas of riparian vegetation.



Grasslands and riparian vegetation to the south of Manning River Drive

Managed grasslands associated with occupied industrial/commercial activities and the Taree Airport are present to the east of the subject site.



Managed vegetation within industrial/ commercial lots to the east of the subject site



Areas of Grasslands are present on adjacent land to the west of the subject site with these areas of vegetation associated with rural land in these aspects. It is noted that the grassland vegetation is separated from the subject site by the waterway of the Dawson River.



Grasslands with scattered and small clusters of trees to the northwest and west of the Dawson River

An indication of the relationship of the vegetation of bushfire significance to the subject site and proposed development is presented in **Figure 5** below.

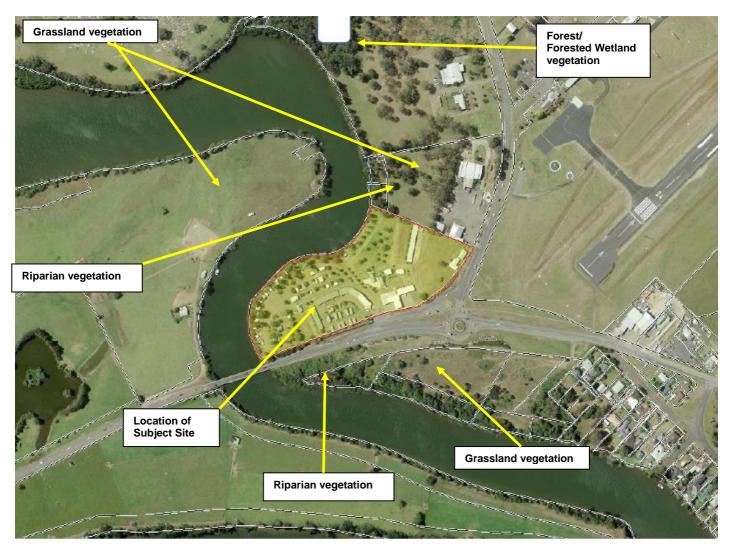


Figure 5 - Vegetation Relationships to Subject Site

The following table summarizes the various vegetation structures which are of bushfire significance to the subject site.

ASPECT	VEGETATION DESCRIPTION	VEGETATION CLASSIFICATION – (Keith, 2004)
North	Grasslands with scattered and clusters of trees in the western portion of the adjoining allotment to the north of the subject site.	Grassland
Northwest	Riparian vegetation grasslands on adjoining and adjacent land.	Similar in specification to Rainforest
South	Grasslands and riparian vegetation on adjacent land to the south of Manning River Drive.	Similar in specification to Rainforest
West/Northwest	Grasslands on adjacent land (to the west of Dawsons	Grasslands

River)

6.5 Fire Danger Index

The fire weather for the subject site is assumed on the worst-case scenario. In accordance with NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019, NSW Rural Fire Service, *NSW Local Government Areas FDI*, May 2017 and Table 2.1 of AS 3959 -2018, the fire weather for the site is based upon the 1:50 year fire weather scenario and has a Fire Danger Index (FDI) of 80.

6.6 Fauna and Flora Issues

A fauna and flora evaluation has not been undertaken in conjunction with this bushfire hazard assessment and as such issues pertaining to fauna and flora are outside the scope of this report.

7.0 BUSHFIRE THREAT REDUCTION MEASURES

The following bushfire issues and constraints have been identified through considering the requirements of Chapter 6 of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019 in relation to the proposed development.

In order to reduce the bushfire threat, it is suggested the following measures be included in any strategy developed for the proposed additional short-term sites within the existing caravan park having regard to the nature and extent of the existing development on the subject site.

7.1 NSW Rural Fire Services, Planning for Bushfire Protection, 2019

7.1.1 Provision of Defendable Space/Asset Protection Zone

To ensure that the aims and objectives of Chapter 6 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019, are achieved for the development, a defendable space is typically provided between the asset, (proposed development), and the hazard. The defendable space provides for, minimal separation for safe firefighting, reduced radiant heat, reduced influence of convection driven winds, reduced ember viability and dispersal of smoke.

It is noted that tourist accommodation developments require APZ's in accordance with Special Fire Protection Purposes (SFPP) requirements of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019. APZ's in SFPP situations must be such that radiant heat levels of greater than 10kW/m² will not be experienced by occupants or emergency workers entering or exiting a building.

In this regard Table 6.8a of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019 suggests that the following APZ's would be applicable to the proposed development on the basis of it being a SFPP development.

ASPECT	VEGETATION	SLOPE	TOTAL REQUIRED APZ		COMPLIANCE COMMENT	
			IPA	ΟΡΑ	TOTAL	
North	Grassland	4° - 5° Downslope	40m	-	APZ 40m	All proposed sites are located outside the APZ
Northwest	Similar in specification to Rainforest	0° Flat	38m	-	38m	All proposed sites are located outside the APZ
South	Similar in specification to Rainforest	2° - 3° Downslope	47m	-	47m	All proposed sites except portion of Site 12 are located outside the APZ – refer to comments below

Table 4 – Minimum APZ Requirements for SFPP Development

West/Northwest	Grasslands	0° Flat	36m	-	36m	All proposed sites are located
						outside the APZ

The above minimum APZ requirements are shown in **Appendix 4** of this report, (APZ Compliance Concept). As can be seen in **Appendix 4** only the southern portion of proposed Site 12 would not comply with the APZ requirements provided for in **Table 4** above.

It is however noted that Clause 6.3 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 provides that particular SFPP developments demonstrate different characteristics and may require different levels of protection.

The reduced reliance on the provision of Defendable Spaces/APZ's to short term accommodation developments such as caravan and camping areas acknowledges that evacuation prior to an emergency event is the preferred option and that construction under AS 3959 or the NASH Standard as a bushfire threat management measure is impractical, (i.e., tents and caravans).

It is therefore considered that the requirement for a Defendable Space/APZ in accordance with Table 6.8a of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019 is not relevant to proposed short term Site 12 on the basis that there is no building infrastructure to be provided within this site with the emphasis of bushfire threat management in an emergency event being the vacation of the proposed, (and existing), short term accommodation sites in advance of the subject site being impacted by a bushfire.

The aforementioned approach in allowing proposed Site 12 to be located within the relevant APZ's of the caravan park is supported in Clause 6.3.1 of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019 as follows.

No construction requirements for tents are provided in AS 3959 or NASH Standard. **Camping is** *permissible within the APZ of a caravan or tourist park, provided the other relevant BPMs (e.g. emergency management arrangements) are in place.* Careful consideration should be given to the suitability of camping in bush fire prone areas on days of elevated bush fire danger.

Based upon the proposed development design it is considered that the intent of the requirement for the provision of Asset Protection Zones as required by Chapter 6 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 can be satisfied for the proposed additional short-term sites within the existing Dawson River Caravan Park.

7.1.2 Defendable Space/Asset Protection Zone Management

Whilst there is a reduced reliance upon Defendable Space/APZ requirements in relation to the proposed development, it is considered that the existing managed nature of the vegetation within the subject site does assist in reducing the level of bushfire threat to not only the occupants of the proposed new short-term sites but also other users of the caravan park and associated buildings as emergency service personnel may attend the subject site during an emergency.

The following standards are therefore considered to be applicable to the ongoing management of the vegetation within the subject site.

Inner Protection Area

An IPA should provide a tree canopy cover of less than 15% and should be located greater than 2 metres from any part of the roofline of a building.

Garden beds of flammable shrubs are not to be located under trees and should be no closer than 10m from an exposed window or door.

Trees should have lower limbs removed up to a height of 2 metres above the ground.

The imposition of specific vegetation management requirements for the caravan park provides for a bushfire threat management outcome which is entirely consistent with the performance objectives of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019.

7.1.3 Operational Access and Egress

Access to and egress from the subject site is via Manning River Drive which adjoins the subject site along the southern property boundary.

Manning River Drive is an all-weather, two-way, 2-wheel drive bitumen sealed public road which serves as a major connecting road between the Taree CBD to the west and the Pacific Highway to the east. Travel to and from the subject site is primarily for the east and west although the presence of other public road infrastructure in the locality provides for a variety of access and egress opportunities for the subject site from areas which would be protected from the impacts of bushfire.

Access to and within the caravan park is via an existing internal road system which provides for the forwards movement of vehicles at all times.



Existing gravel internal access road. Used by caravans and other medium sized vehicles



Existing gravel internal access road. Used by caravans and other medium sized vehicles

In accordance with Table 6.8b of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 access to the proposed short-term sites must be provided in accordance with the property access road requirements of Table 5.3b of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019.

An assessment of compliance of the existing property access road infrastructure with the relevant requirements of Table 5.3b of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 is provided as follows.

Performance Criteria	Acceptable Solutions	Compliance Comment
The intent may be achie	eved where:	
 firefighting vehicles can access the dwelling and exit safely 	No specific access requirements apply in a urban area where a 70 metre unobstructed path can be demonstrated between the most distant external part of the proposed dwelling and the nearest part of the public access road (where the road speed limit is not greater than 70kph) that supports the operational use of emergency firefighting vehicles (i.e. a hydrant or water supply).	Due to its size and spatial relationship to Manning River Drive some of the proposed short-term sites would not meet the 70m unobstructed path requirement to the existing hydrants within the Manning River drive road reserve.
	 In circumstances where this cannot occur, the following requirements apply: minimum carriageway width of 4m; in forest, woodland and heath situations, rural property access roads have passing bays 	The design and construction of the existing network of internal access roads which will service the proposed short-term sites

Table 5 - Acceptable Solutions (Access/Internal Roads) PfBP 2019

 every 200m that are 20m long by 2m wide, making a minimum trafficable width of 6m at the passing bay; and a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches; and 	complies with the relevant design and construction requirements of Table 5.3b of NSW Rural Fire Services, <i>Planning for Bushfire</i> <i>Protection</i> , 2019.
 provide a suitable turning area in accordance with Appendix 3; and curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress; and the minimum distance between inner and outer curves is 6m; and the cross fall is not more than 10°; and maximum grades for sealed roads do not exceed 15° and not more than 10° for unsealed roads; and a development comprising more than three dwellings has formalised access by dedication of a road and not by right of way. 	The existing internal road network and associated manoeuvring areas are suitable for use by emergency service vehicles including Category 1 RFS tankers.
Note: Some short constrictions in the access may be accepted where they are not less than the minimum (3.5m), extend for no more than 30m and where the obstruction cannot be reasonably avoided or removed. the gradients applicable to public roads also apply to community style development property access roads in addition to the above.	

It is also noted that Table 6.8b of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 requires compliance with the following additional access requirements.

Table 6 - Acceptable Solutions	(Access Roads) PfBP 2019

Performance Criteria	Acceptable Solutions	Compliance Comment
The intent may be achie	eved where:	
The capacity of access roads is adequate for firefighting vehicles.	The capacity of road surfaces and any bridges/ causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes); bridges and causeways are to clearly indicate load rating.	The design and construction of the existing internal road network is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes) There are no bridges or causeway crossings.

I have a superapriate in the budgeste are leasted outside of neglitic	ing Due to its size and spatial
 hydrants are located outside of parki reserves and road carriageways to ensure accessibility to reticulated wa for fire suppression. hydrants are provided in accordance with the relevant clauses of AS 2419.1:2005; and there is suitable access for a Categorn fire appliances to within 4m of the static water supply where no reticulated supply is available. 	relationship to Manning River Drive some of the proposed short-term sites would not meet the 70m unobstructed path requirement to the existing

Based upon the nature and extent of existing public and private road infrastructure and the nature of the proposed development it is considered that the requirements of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 for the provision of access and egress can be satisfied by the proposed development in the context of the nature of existing activities undertaken on the subject site.

7.1.4 Services - Water, Gas and Electricity

As set out in Section 6.8.3 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019, developments in bushfire prone areas must maintain a water supply for firefighting purposes. The existing caravan park sites and associated buildings and infrastructure, (and the proposed additional short-term sites), have access to the reticulated town water supply which services the facility. Access to the reticulated town water supply will provide a water supply that is available for firefighting purposes. It is however noted that in accordance with NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 the determination of a guaranteed water supply is to be made by the water supply authority where mains water supply is available.

In accordance with Table 6.8c of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019, access to a reticulated water supply is an acceptable solution for caravan parks. In this regard it is noted that a number of existing street hydrants are located immediately adjacent to the southern and north-eastern boundaries of the subject site whilst a number of existing fire hose reels are also available within the existing caravan park with this infrastructure already available for firefighting and asset protection purposes. It is further noted that compliance with the relevant provisions of Division 3, Subdivision 8 of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021, will require the provision of hydrant and fire hose reel coverage to the proposed additional sites within the caravan park.

It is further noted that a number of existing 'in ground' concrete water tanks, a swimming pool and the presence of the Dawson River immediately adjacent to the subject site provide

for a number of static water supplies within the caravan park which would be available for firefighting and asset protection activities, refer to **Appendix 5** of this report.

Electricity supply is connected to the caravan park and is available for extension to the proposed additional short-term sites.

Reticulated gas services are not available to the subject site; however, any reticulated or bottled gas supply which is proposed to be installed in conjunction with the proposed development must comply with the following requirements.

- bottled gas is to be installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is to be used.
- 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.
- if gas cylinders need to be kept close to the building, safety valves are directed away from the building and at least 2m away from any combustible material, so they do not act as a catalyst to combustion.
- polymer-sheathed flexible gas supply lines to gas meters adjacent to buildings are not to be used; and
- above-ground gas service pipes external to the building are metal, including and up to any outlets.

It is considered that the relevant acceptable solutions as provided for by Clause 6.8.3 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 are capable of being complied with regardless of the proposed development.

The provision of hydrant and hose reel coverage to the proposed additional short-term sites together with the availability of a number of static water supplies as discussed in this report provides for a bushfire threat management outcome which is entirely consistent with the relevant performance requirements of Chapter 6 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019.

7.1.5 Landscaping

Landscaping is a major cause of fire spread to buildings and therefore any future landscaping within the existing caravan park will need careful planning to produce gardens that do not contribute to the spread of a bushfire.

Appendix 4 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019, contains standards that are applicable to the provision and maintenance of landscaping. Any landscaping proposed to be undertaken in conjunction with the proposed development is to comply with the principles contained in Appendix 4 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019.

Compliance with Appendix 4 of **NSW Rural Fire Services**, *Planning for Bushfire Protection*, 2019, will satisfy the intent of the bush fire protection measures that are applicable to the provision of landscaping.

7.1.6 Emergency Evacuation Planning

It is considered that the location and nature of the subject development is such that evacuation maybe required.

NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 provides that evacuation prior to an emergency event is a critical bushfire threat management measure for the form of development which is the subject of this report.

In this regard an Emergency Evacuation Plan incorporating bushfire evacuation has been prepared for the existing caravan park, refer to **Appendix 6**. Therefore prior to the occupation of the proposed additional short-term sites the existing Emergency Evacuation Plan is to be updated to incorporate all existing and new sites within the caravan park.

The presence of an onsite caretaker/park manager provides for enhanced opportunities for the ongoing implementation of the Emergency Evacuation Plan which is required to support the operation of the existing caravan park.

The Emergency Management arrangements for the existing caravan park and proposed development are to reflect the relevant requirements of Clause 6.8.4 of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019.

7.2 Construction of Buildings in Bushfire Prone Areas

7.2.1 General

The bushfire construction requirements of the National Construction Code for Class 1, 2, 3, 4 and some Class 9 buildings are applicable in NSW. In this regard the National Construction Code provides that compliance with the relevant requirements of AS3959 – 2018 satisfies the performance requirements which are applicable the National Construction Code.

It is however noted that in NSW the relevant Bushfire Attack Level and construction requirements must be determined in accordance with Appendix 1 of NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 (in particular Table A1.12.6), rather than in accordance with Section 2 of AS 3959 - 2018.

7.2.2 Construction of Buildings in Bushfire Prone Areas

Given that the proposed development does not contemplate the construction or installation of buildings or other structures the provisions of the National Construction Code and AS 3959 – 2018 are not considered to be relevant to the proposed development.

In this regard Chapter 6 of and the NSW Rural Fire Services, *Planning for Bushfire Protection*, 2019 acknowledges that construction under AS 3959 or NASH Standard is impractical, (i.e. tents and caravans), in relation to sites where caravans and camping activities are undertaken.

7.3 Consistency with PfPB 2019 Performance Objectives

As indicated in Section 3.2.1 of this report the specific objectives for developments within existing Special Fire Purpose Protection Developments as provided for by NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019 are to.

- provide an appropriate defendable space:
- site the building in a location which ensures appropriate separation from the hazard to minimise potential for material ignition:
- provide a better bush fire protection outcome for existing buildings:

- new buildings should be located as far from the hazard as possible and should not be extended towards or situated closer to the hazard than the existing buildings (unless they can comply with section 6.8):
- ensure there is no increase in bush fire management and maintenance responsibility on adjoining landowners without their written confirmation:
- ensure building design and construction enhances the chances of occupant and building survival; and
- provide for safe emergency evacuation procedures including capacity of existing infrastructure (such as roads).

Having regard to the above the proposed development is considered to be consistent with the specific objectives as follows.

Table 7 – SFPP Infill Development Objectives Compliance Assessment
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PERFORMANCE OBJECTIVE	COMPLIANCE COMMENT
 provide an appropriate defendable space. 	Appropriate defendable spaces are available to the proposed additional short term sites having regard to the nature and form of occupation of the proposed sites in particular proposed Site 12. Given that the proposed development does not involve the construction and/or installation of buildings or other structures it is considered that the availability of defendable spaces to proposed Site 12 is not relevant in the circumstances.
	In this regard the emphasis of bushfire threat management in an emergency event for the form of development which is the subject of this report is the vacation of the proposed short term accommodation sites well in advance of the subject site being impacted by a bushfire.
	The presence of an onsite caretaker/park manager provides for enhanced opportunities for the ongoing implementation of the Emergency Evacuation Plan which is required to support the operation of the existing caravan park, (and proposed additional short- term sites).
	Allowing portion of proposed Site 12 to be located within the relevant Defendable Space/APZ's of the caravan park is supported in Clause 6.3.1 of NSW Rural Fire Service, <i>Planning for Bushfire Protection</i> , 2019 as follows;
	No construction requirements for tents are provided in AS 3959 or NASH Standard. Camping is permissible within the APZ of a caravan or tourist park, provided the other relevant BPMs (e.g., emergency management arrangements) are in place. Careful consideration should be given to the suitability of

	camping in bush fire prone areas on days of elevated bush fire danger.
 site the building in a location which ensures appropriate separation from the hazard to minimise potential for material ignition. 	The proposed development does not involve the construction and/or installation of new buildings or other structures. The emphasis of bushfire threat management in an emergency event for the form of development which is the subject of this report is the vacation of the proposed short term accommodation sites in advance of the subject site being impacted by a bushfire.
 provide a better bushfire protection outcome for existing buildings. 	The implementation of an Emergency Evacuation Plan as provided for in this report which encompasses the proposed development together with the existing caravan park provides for a bushfire threat management outcome which is entirely consistent with the performance objectives of NSW Rural Fire Service, <i>Planning for Bushfire Protection</i> , 2019. The extension of existing hydrant and hose reel infrastructure to service the proposed new sites together with the availability of a number of static water supplies as provided for in this report provides for a bushfire threat management outcome for the existing caravan park and its buildings and associated infrastructure which is entirely consistent with the
	performance objectives of NSW Rural Fire Service, <i>Planning for Bushfire Protection</i> , 2019.
 new buildings should be located as far from the hazard as possible and should not be extended 	The proposed development does not involve the construction and/or installation of new buildings or other structures.
towards or situated closer to the hazard than the existing buildings (unless they can comply with section 6.8);	The emphasis of bushfire threat management in an emergency event for the form of development which is the subject of this report is the vacation of the proposed short term accommodation sites in advance of the subject site being impacted by a bushfire.
	The presence of an onsite caretaker/park manager provides for enhanced opportunities for the ongoing implementation of the Emergency Evacuation Plan which is required to support the operation of the existing caravan park, (and proposed additional short- term sites).
 ensure there is no increase in bush fire management and maintenance responsibility on adjoining landowners without their written confirmation. 	The proposed development does not increase the bushfire management and maintenance responsibility for adjoining landowners beyond that which currently exists as the proposed development does not rely upon changes to the nature or extent of existing areas of bushfire hazard vegetation.

 ensure building design and construction enhances the chances of occupant and building survival; and 	The proposed development does not involve the construction and/or installation of new buildings or other structures. The emphasis of bushfire threat management in an emergency event for the form of development which is the subject of this report is the vacation of the proposed short term accommodation sites in advance of the subject site being impacted by a bushfire.
 provide for safe emergency evacuation procedures including capacity of existing infrastructure (such as roads). 	The existing internal road network and associated manoeuvring areas which service the existing caravan park are suitable for use by emergency service vehicles including RFS tankers. The design and construction of the existing internal road infrastructure is consistent with the relevant performance requirements of Tables 5.3b and 6.3b of NSW Rural Fire Services, <i>Planning for Bushfire</i> <i>Protection</i> , 2019.

8.0 SUMMARY OF REQUIREMENTS

The following requirements are considered to be integral to this bushfire hazard assessment and must be incorporated into the proposed additional short term accommodation sites within the footprint of the existing Dawson River Caravan Park which is located on land known as Lot 1 DP 1243974, 1 Manning River Drive, Taree.

- (i) Proposed additional short-term sites are to be used for caravan and camping and alike activities only. The installation of moveable dwellings, (e.g., cabins) is not permitted.
- (ii) All areas of vegetation within the subject site are to be maintained at all times to the standards which are applicable to Inner Protection Areas (IPA's) as provided for in Section 7.1.2 of this report.
- (iii) A water supply reserve and infrastructure as detailed in Section 7.1.4 of this report is to be available to the proposed additional short-term sites.
- (iv) Adopt the landscaping principals in accordance with Section 7.1.5 of this report for any new landscaping.
- (v) The existing Emergency/Evacuation Plan which is relevant to the operation of the caravan park, (including the proposed development), is to be updated to encompass the proposed additional short-term sites. The Emergency and Evacuation Plan is to comply with the relevant requirements of Clause 6.8.4 NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019.

9.0 RECOMMENDATIONS

In addition to the requirements of this report it is recommended that a bushfire survival plan be developed and implemented for the subject site.

In this regard your attention is drawn to the following documents which may be of assistance in the preparation of a bushfire survival plan.

- NSW Rural Fire Service Fact Sheet (Get Ready for a Bushfire).
- NSW Rural Fire Service Fact Sheet (Prepare Your Home)
- NSW Rural Fire Service Fact Sheet (Leave Early Your Safest Choice)
- NSW Rural Fire Service Fact Sheet (Prepare to Stay)
- NSW Rural Fire Service Fact Sheet (Prepare Your Property)

10.0 CONCLUSION

This report has identified the bushfire risk which is applicable to the proposed additional short term accommodation sites within the existing Dawson River Caravan Park which is located on land known as Lot 1 DP 1243974, 1 Manning River Drive, Taree and has identified the bushfire management measures which would be applicable to the proposed short-term sites.

This report is however contingent upon the following assumptions and limitations.

10.1 Assumptions

- (i) For a satisfactory level of bushfire safety to be achieved regular inspection and testing of proposed measures, building elements and methods of construction, specifically nominated in this report, is essential and is assumed in the conclusion of this assessment.
- (ii) It is assumed that any building works will comply with the DTS provisions of the NCC including the relevant requirements of Australian Standard 3959 – 2018.
- (iii) Buildings are constructed and maintained in accordance with the risk reduction strategy in this report.

10.2 Limitations

- (i) The data, methodologies, calculations and conclusions documented within this report specifically relate to the building and must not be used for any other purpose.
- (ii) This report is based upon the information contained in **Appendix 3** of this report.
- (iii) A reassessment will be required to verify consistency with this assessment if there is building alterations and/or additions, change in use, or changes to the risk reduction strategy contained in this report.
- (iv) This report has been based upon the vegetation characteristics observed at the time of the site inspections. No responsibility is taken where the vegetation characteristics of the subject site or surrounding areas is changed or modified beyond that which is presented within this report.

11.0 REFERENCES

NSW Rural Fire Services, Planning for Bushfire Protection, 2001

NSW Rural Fire Services, Planning for Bushfire Protection, 2006

NSW Rural Fire Services, Planning for Bushfire Protection, 2019

AS 3959-2018, Construction of Buildings in Bushfire Prone Areas

Keith David 2004, Ocean *Shores to Desert Dunes, The Native Vegetation of New South Wales and the ACT*, Department of Environment and Conservation

NSW State Government, Rural Fires Act, 1997

NSW Rural Fire Service, Guideline for Bushfire Prone Land Mapping, 2002

Australian Building Codes Board, National Construction Code, 2019

NSW Rural Fire Service – Guideline for Bushfire Prone Land Mapping 2002

NSW Rural Fire Service, NSW Local Government Areas FDI, May 2017

Disclaimer

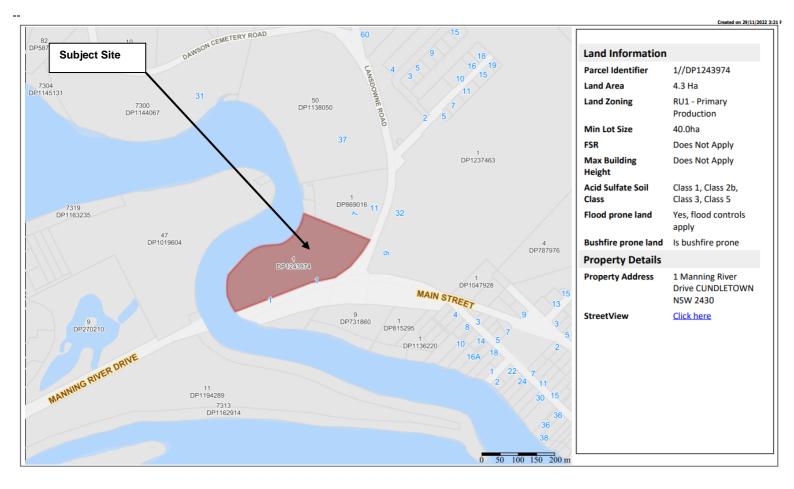
The findings referred to in this report are those which, in the opinion of the author, are required to meet the requirements of NSW Rural Fire Service, *Planning for Bushfire Protection*, 2019. It should be noted that the Local Authority having jurisdiction for the area in which the property is located may, within their statutory powers, require different, additional or alternative works/requirements to be carried out other than those referred to in this report.

This report has been prepared partially on information provided by the client.

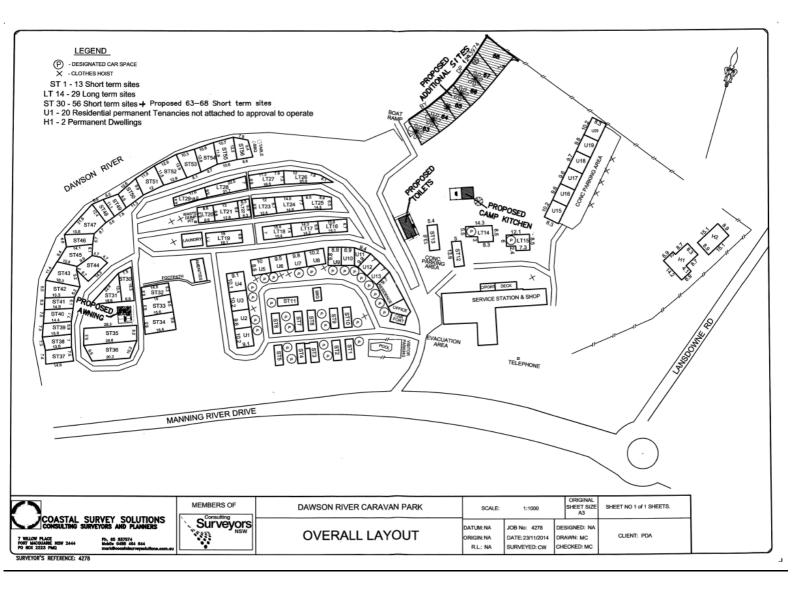
The author denies any legal liability for action taken as a consequence of the following:

- The Local Authority requiring alternative or additional requirements to those proposed or recommended in this report.
- Incorrect information, or mis-information, provided by the client with regard the proposed buildings which are in good faith included in the strategies proposed in this report and later found to be false.

APPENDIX 1 Subject Site



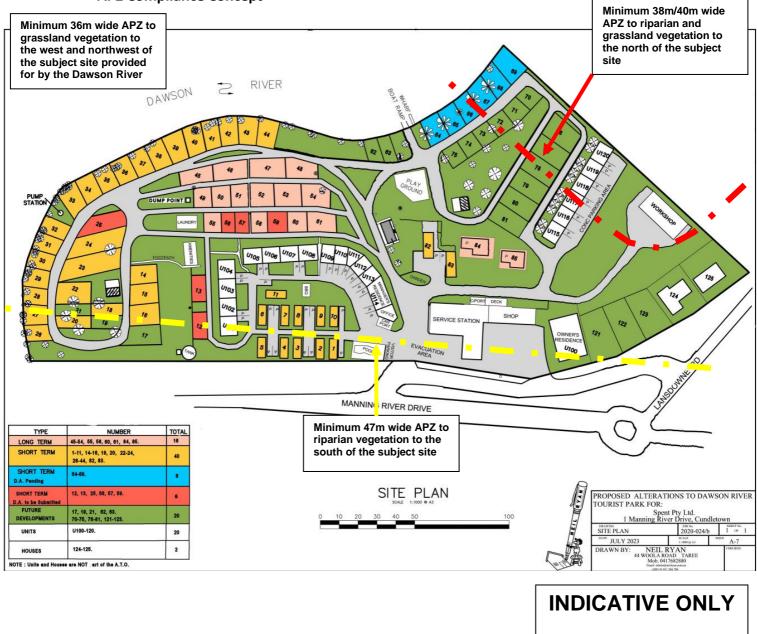
<u>APPENDIX 2</u> Existing Caravan Park Layout



APPENDIX 3 Proposed Development

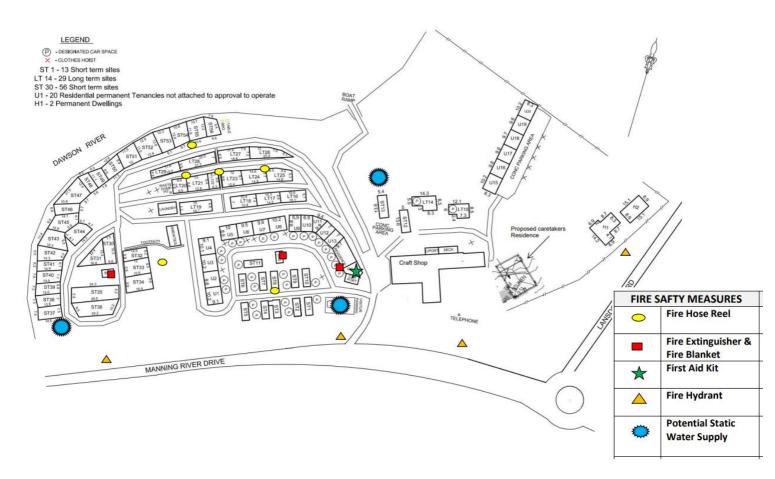


APPENDIX 4 APZ Compliance Concept



NOT TO SCALE

APPENDIX 5 Existing Fire Services



<u>APPENDIX 6</u> Extracts from Existing Evacuation Plan

EMERGENCY EVACUATION PLAN DAWSON RIVER TOURIST PARK

JULY 2023

EMERGENCY MANAGEMENT PLAN

DAWSON RIVER TOURIST PARK

LOT 1 DP 1243974 1 MANNING RIVER DRIVE TAREE

JULY 2023

	RGENCY EVACUATION PLAN VSON RIVER TOURIST PARK JULY 2023
TA	BLE OF CONTENTS
1.	INTRODUCTION
	1.1 Emergency Planning 3 1.2 Evacuation Due to Threats 3
2.	GENERAL DETAILS
	2.1 Definitions
3.	ADMINISTRATIVE PROVISIONS
4.	INFORMATION ON THE FACILITY
5.	ROLES AND RESPONSIBILITES
	5.1 Park Manager125.2 Chief Warden135.3 Deputy Warden135.4 Emergency Management Personnel13
6.	PROCEDURES
	6.1 Procedures – Bushfire Threat146.2 Procedures – Flood Threat166.3 Procedures – Other Emergency Events19
7.	DESIGNATED ASSEMBLY POINT
8.	TRANSPORT DETAILS
9.	EVACUATION CENTRE
10.	CONTACT DETAILS
11.	SECURITY
12.	TRAINING

APPENDIX 1 – DAWSON RIVER TOURIST PARK APPENDIX 2 – FIRE SAFETY MEASURES APPENDIX 3 – GENERAL EMERGENCY PLAN DETAILS APPENDIX 4 – EVACUATION ASSEMBLY POINT

2