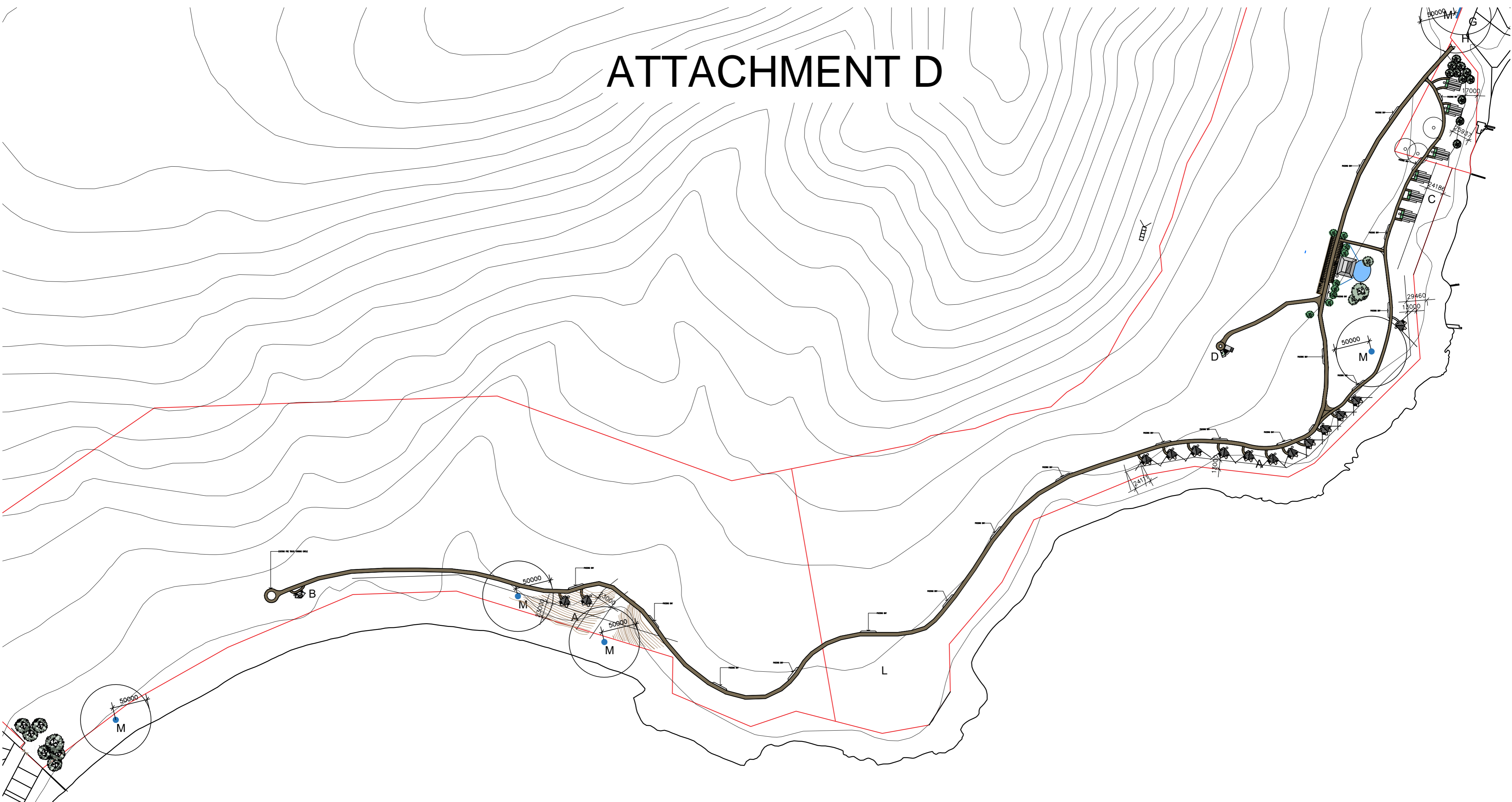


ATTACHMENT D



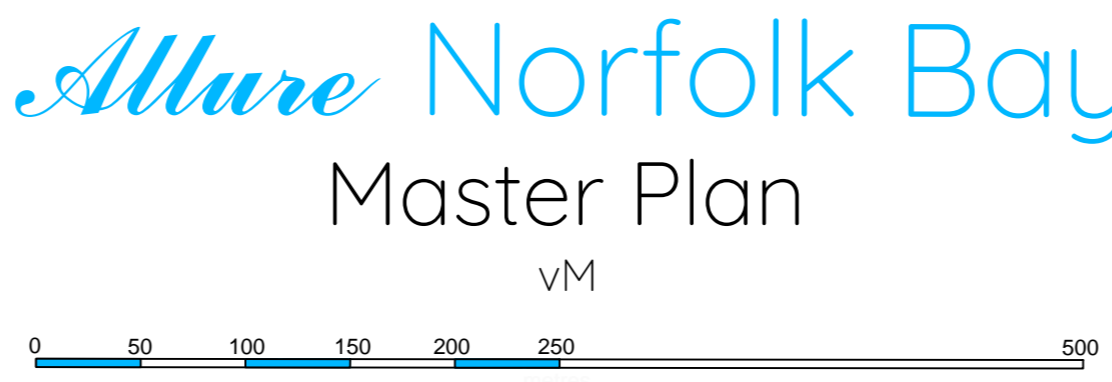

Sorell Council
 Development Application: 5.2022.184.1 -
 Revised plans - 297 Primrose Sands Road,
 Primrose Sands.pdf
 Plans Reference: P8
 Date Received: 22/12/2025

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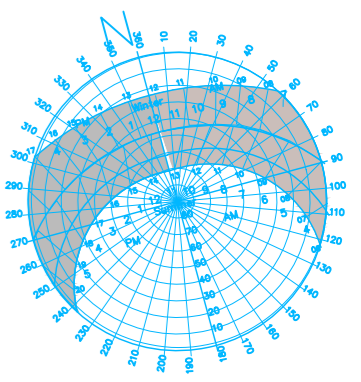
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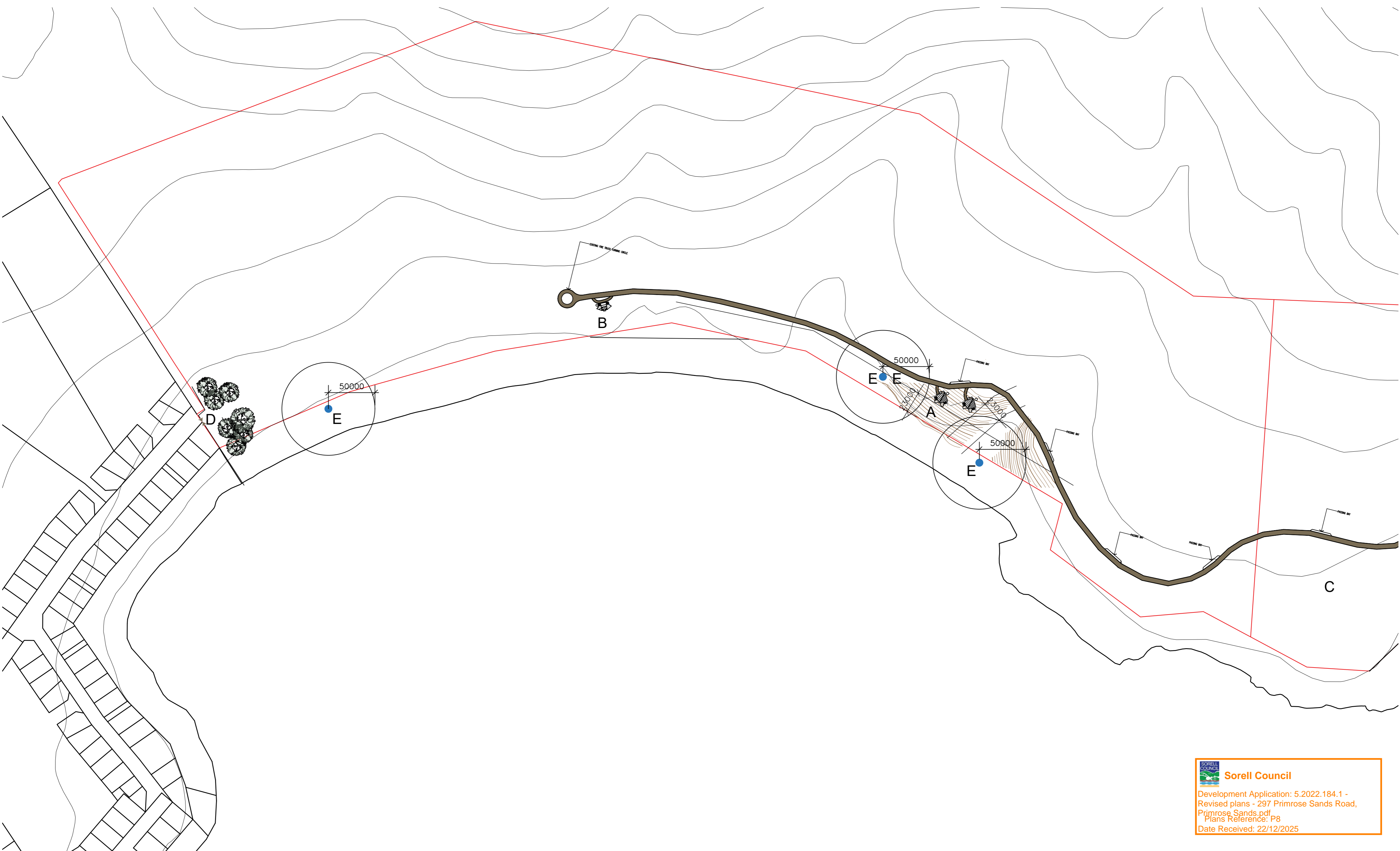
Accommodation
 East: Cabin Type A 12
 Cabin Type D 13
 West: Cabin Type A 2
 Cabin Type B 1
 Total 28



- Key**
- A. Cabin Type A
 - B. Cabin Type B
 - C. Cabin Type D
 - D. Massage/Sauna Centre
 - E. The Lodge (reception /dining)
 - F. Parking

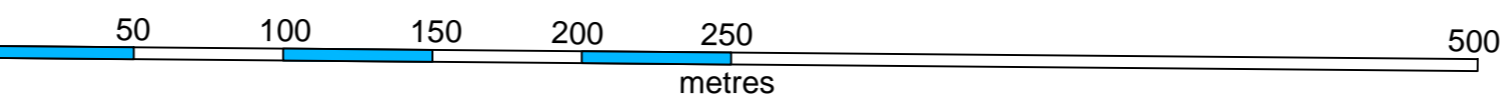
- G. Connellys Marsh Road
- H. Allure Entry
- J. Emergency Access only
- K. Primrose Sands Rd
- L. Grave Site
- M. Aboriginal Heritage Site (refer ACHA for detailed assessment)





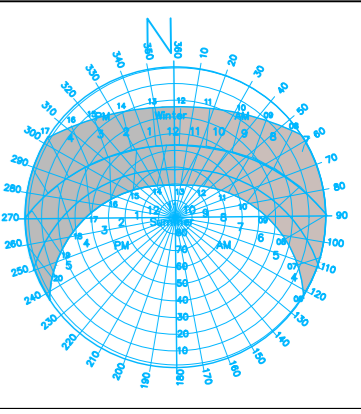

Sorell Council
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 Primrose Sands.pdf
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CALIBAN Master Plan, West
 (1 of 2)
 vM
 ANB1 DA02 16 December 2025
 Scale: 1:2,500 @ A2
CONSULTING


Allure Norfolk Bay


Key
 A. Cabin Type A
 B. Cabin Type B
 C. Grave Site
 D. Emergency Access only
 E. Aboriginal Heritage Site
 (refer ACHA for detailed assessment)

Accommodation	
East:	Cabin Type A 12 Cabin Type D 13
West:	Cabin Type A 2 Cabin Type B 1
Total	28



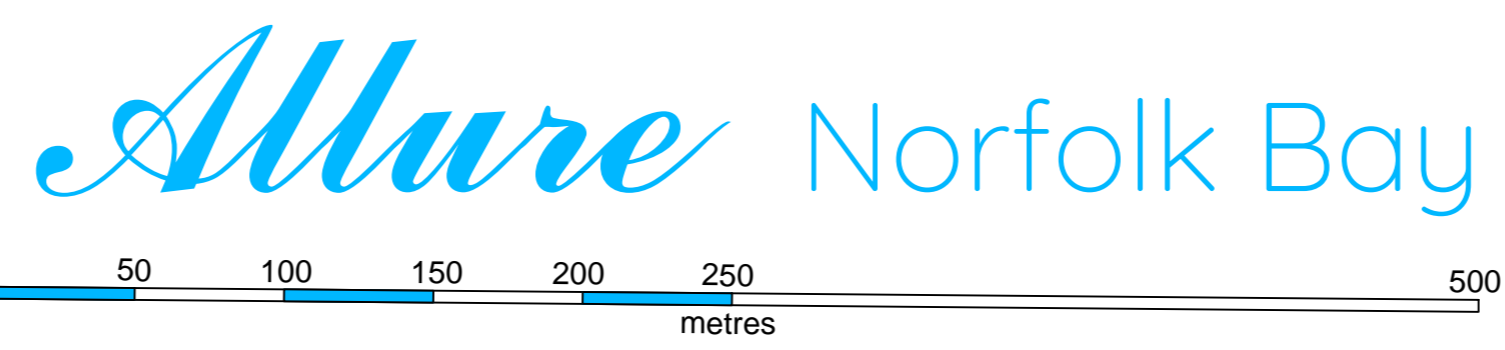



Sorell Council
 Development Application: 5.2022.184.1 -
 Revised plans - 297 Primrose Sands Road,
 Primrose Sands.pdf
 Plans Reference: P8
 Date Received: 22/12/2025

Master Plan, East

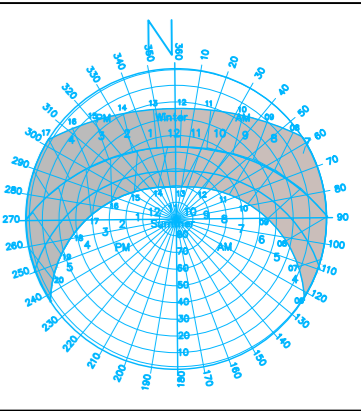
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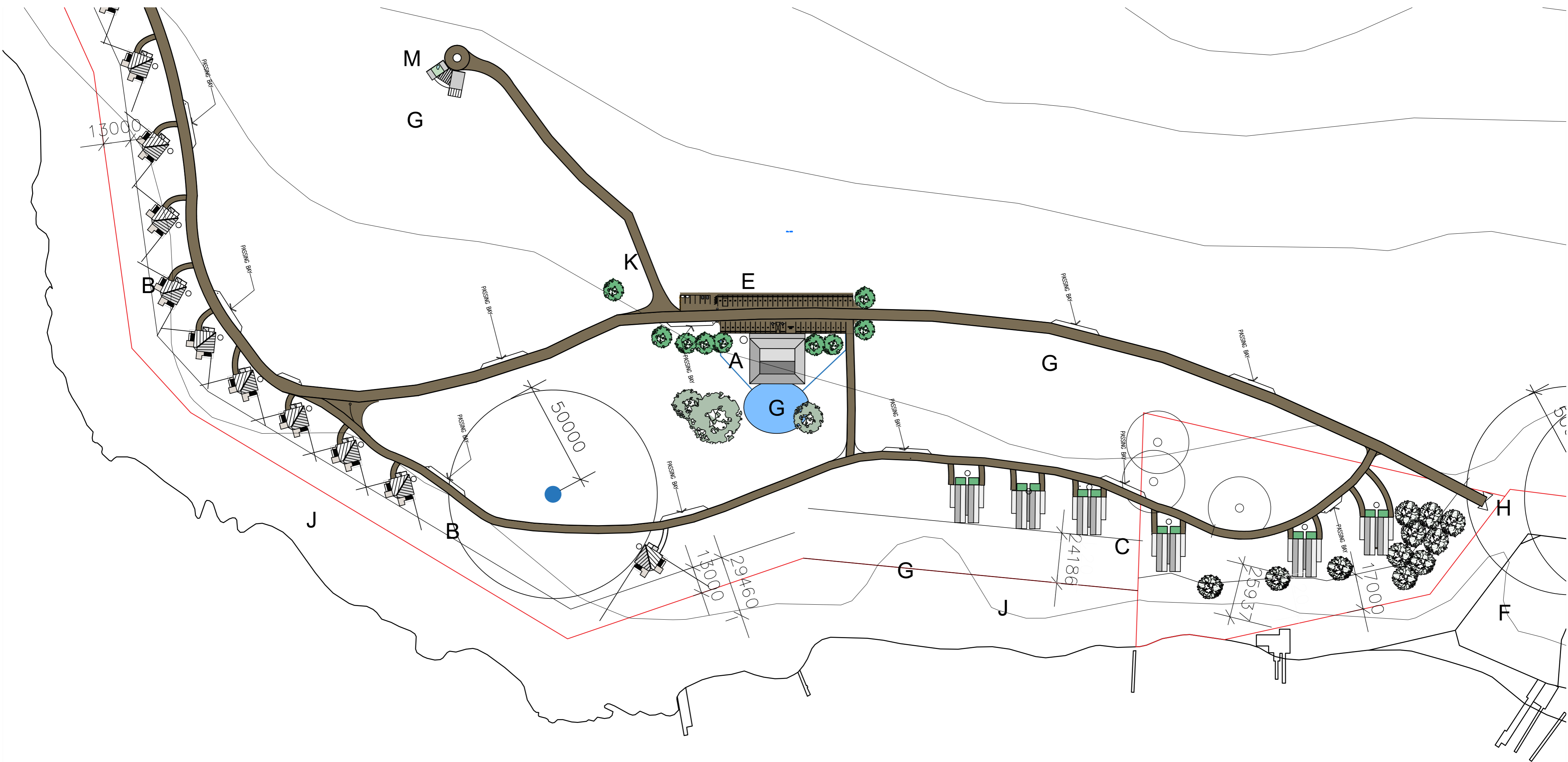
ANB1 DA03 16 December 2025
Scale: 1:2,500 @ A2



- A. Cabin Type A
- B. The Lodge (reception /dining)
- C. Grave Site
- D. Cabin Type D
- E. Massage/Sauna Centre
- F. Aboriginal Heritage Site (refer ACHA for detailed assessment)

Accommodation	
East:	Cabin Type A 12 Cabin Type D 13
West:	Cabin Type A 2 Cabin Type B 1
Total	28






Sorell Council
 Development Application: 5.2022.184.1 -
 Revised plans - 297 Primrose Sands Road,
 Primrose Sands.pdf
 Plans Reference: P8
 Date Received: 22/12/2025

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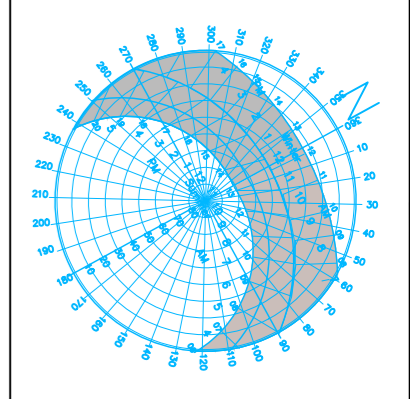
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 Date: 16 Dec 2025
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Accommodation	
East:	Cabin Type A 12
	Cabin Type D 13
West:	Cabin Type A 2
	Cabin Type B 1
Total	28

Allure Norfolk Bay
 Eastern Foreshore
 vL

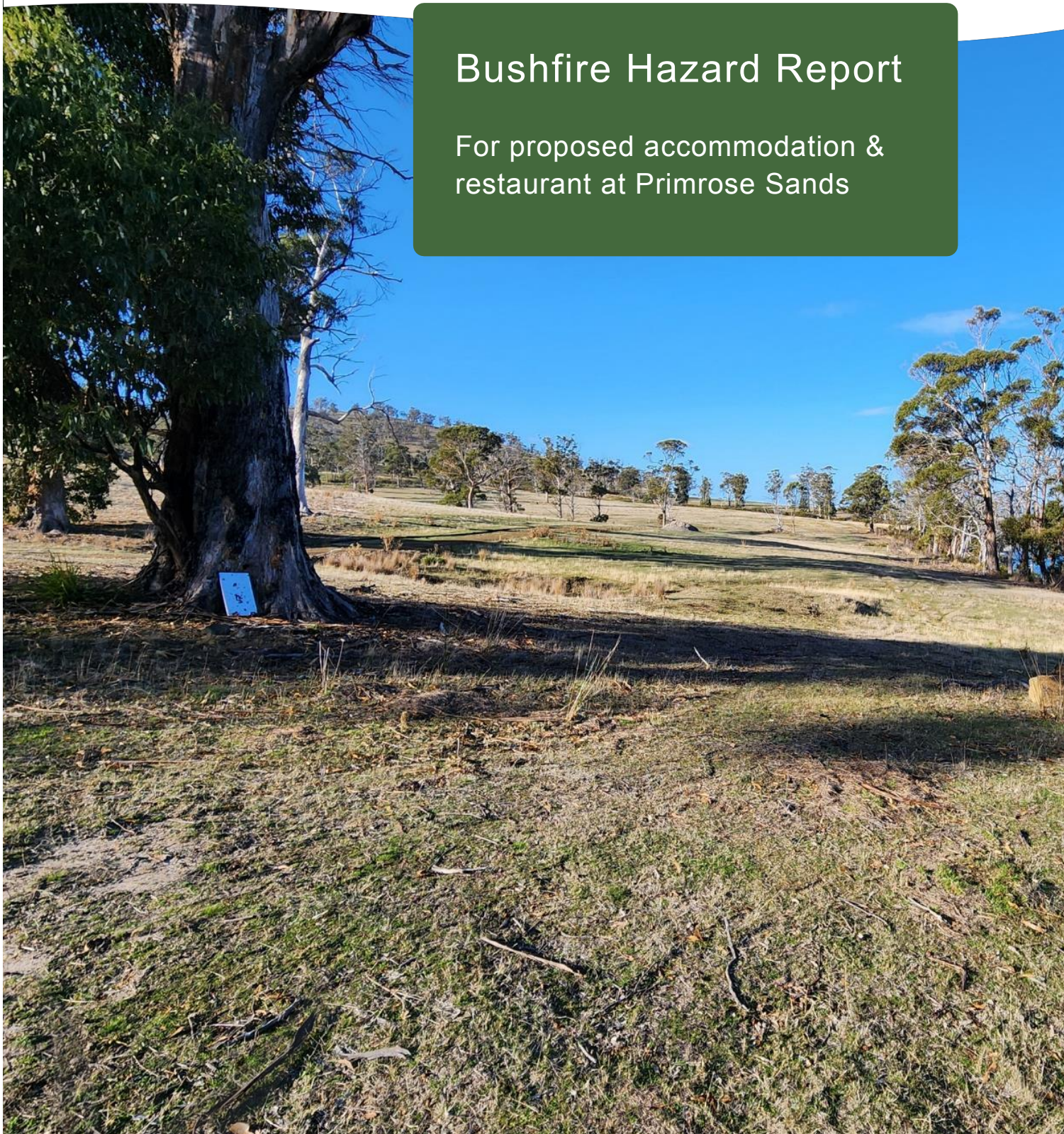
- Key**
- A. The Lodge (reception/dining)
 - B. Type A Cabins
 - C. Type D Cabins
 - D. Cassuarina Screen
 - E. Parking
 - F. Closest Neighbour

- G. Existing Dams
- H. Allure Entry
- J. 30m Crown Reserve
- K. See Lodge Site Plan
- M. Massage/Sauna Centre



Bushfire Hazard Report

For proposed accommodation &
restaurant at Primrose Sands



Executive Summary

This bushfire hazard report for new accommodation cabins and a restaurant at 297 Primrose Sands Road, Primrose Sands has been developed as part of a building application. The land is within the boundary of a bushfire-prone area on the Sorell Interim Planning Scheme 2015 (Scheme) overlay map.

The report comprises the bushfire attack level (BAL) assessment, as defined by the Director's Determination – Requirements for Building in a Bushfire-Prone Area (transitional) v2.2 2020 (Director's Determination) and includes provisions for property access and water supply for fighting fires.

The attached Bushfire Hazard Management Plans (BHMPs), as required by Building Regulations 2016, indicate the management and protection measures required to be implemented.

The assessment has determined the habitable buildings can comply with **BAL 19** standards provided the following conditions are met:

- Construction of the new Class 1b habitable buildings must comply with construction standards for **BAL 19** as defined in AS3959-2018 (Sections 3 and 6) to ensure suitably defensible buildings. This is acceptable to the project building surveyor and appropriate as the development was approved and substantially commenced under the Scheme.
- Construction of the new Class 6 restaurant building must comply with construction standards for **BAL 12.5** as defined in AS3959-2018 (Sections 3 and 5) to ensure suitably defensible building that may be used to shelter in place during a bushfire.
- Property access, which is greater than 200 m long, must provide access to the firefighting water points with hardstands, and meet design and construction specifications as per Table 4.2 Elements B and C of the Director's Determination.
- The provision of static firefighting water supply to meet the requirements of Table 4.3B of the Director's Determination.
- The Hazard Management Areas (HMAs) must meet minimum separation distances from the bushfire hazard (classified vegetation) as per Table 4.4 of the Director's Determination and as set out in Table 1 to Table 8 of this document and the BHMPs (Attachments 1-3). These minimum separation distances for the new Class 1b habitable building and Class 6 restaurant are detailed in Section 3.4 and the BHMPs.

Subject to implementing the above conditions and the BHMPs, the proposed Class 1b habitable visitor accommodation buildings and Class 6 restaurant (shelter in place) will satisfy the requirements of the Director's Determination and Australian Standard 3959-2018, Construction of Buildings in Bushfire-prone Areas.

Disclaimers

Bushfire hazard management

All reasonable steps have been taken to ensure that the information and advice contained in this report is an accurate reflection of the fire hazard affecting the proposed development at the time of the assessment and the hazard management measures necessary to meet the standards prescribed in the Director's Determination – Requirements for Building in a Bushfire-Prone Area (transitional) v2.2 2020 and Australian Standard AS 3959-2018 (AS3959).

The prescribed hazard management measures are designed to reduce bushfire risk to future habitable buildings on the site. The effectiveness of these measures relies on their implementation in full and their maintenance for the life of the development. No liability can be accepted for actions by landowners or third parties that undermine or compromise the integrity of prescriptions and recommendations contained in this report.

Due to the unpredictable nature of bushfires, particularly under extreme weather conditions, landowners should be aware that implementation and maintenance of the hazard management measures outlined in this report cannot guarantee that a building will survive a bushfire event.

Planning Scheme provisions

This report and the attached Bushfire Hazard Management Plan (BHMP) address the requirements of the Director's Determination – Requirements for Building in a Bushfire-Prone Area (transitional) v2.2 2020. It is the owners' responsibility to address any other planning requirements relating to use and development of the subject land. Nothing in this report or the attached BHMP should be taken to suggest or imply that the proposed development will satisfy any other planning requirements.

Sarah Bunce – ENVIRO-DYNAMICS

ACCREDITED BUSHFIRE ASSESSOR (BFP-151)

CERTIFICATE No: ED1067 DATE: 18/11/2024

Signed



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1.0 Introduction

This bushfire assessment report for 297 Primrose Sands Road, Primrose Sands (Title Reference 181036/19 and 20, and 210947/1) has been written to accompany an accommodation building application for proposed Class 1b habitable buildings and a Class 6 restaurant which are within the boundary of a bushfire-prone area on the Sorell Interim Planning Scheme 2015 overlay. Sorell Interim Planning Scheme is applicable to this project as the proposed development was approved by Sorell Council in 2019 under the interim scheme with conditions and is acceptable to the project building surveyor.

Under the Director’s Determination – Requirements for Building in a Bushfire-Prone Area (transitional) v2.2 2020 (Director’s Determination) and Building Regulations 2016, a Bushfire Attack Level (BAL) assessment and Bushfire Hazard Management Plan (BHMP) for new habitable buildings are required at the building application stage.

This report provides an assessment of the BAL and outlines protective features and controls that must be incorporated into the design and construction to ensure compliance with AS3959-2018 Construction of buildings in bushfire-prone areas, National Construction Code 2019 (Vol. 2). Additional information for planning and building in bushfire-prone areas is available on the Tasmania Fire Service website.

1.1 Site Details

<u>Landowner:</u>	Young-Mundy Property Trust
<u>Developer:</u>	Allure Lodges Pty Ltd
<u>Location:</u>	297 Primrose Sands Road, Primrose Sands 7173
<u>Title reference:</u>	181036/19 and 20 and 210947/1 PID: 9584675
<u>Municipality:</u>	Sorell
<u>Zoning:</u>	Agriculture – Sorell Interim Planning Scheme 2015
<u>Planning Scheme Overlays:</u>	Bushfire-prone areas, Biodiversity protection area, and Waterway and coastal protection area
<u>Type of Building:</u>	New Class 1b buildings
<u>Date of Assessment:</u>	27/05/2024
<u>Assessment Number:</u>	ED1067

1.2 Site Description

The 81.3 ha property is located at 297 Primrose Sands Road, between Connellys Marsh and Primrose Sands with waterfront along Connellys Bay and Susan Bay (Figure 1). The site is positioned on south, south-east and south-west facing slopes, with an elevation range of 10 to 70 m above sea level. The property is comprised of paddocks and woodlands with a combination of grassland, scrub, and woodland. Mature *Eucalyptus globulus* are scattered across the paddocks. The intermittent drainages through the property run from north to south and are generally lined with woodland.

The adjoining lots to the east consist of grassland and managed coastal development. North of the site, the hills are covered by woodland and grassland, while forest, scrub and managed coastal development cover the adjoining lots to the west. The approximately 2.5 km of coastal crown land to the south is covered by a combination of scrub, woodland and grassland.

The underlying geology is dolerite with a section of Permian-Triassic quartz sandstone between two fault lines that run north-east to south-west in the western half of the site.

The lot is not currently serviced with power or reticulated water, nor is there a nearby fire hydrant.

Under the Sorell Interim Planning Scheme 2015, the land was zoned Rural Resource. Two areas of the site have a Biodiversity Protection Area overlay which has been considered in the selection of the proposed habitable building sites and the BAL assessment.

1.3 Building Proposal

Allure Lodges Pty Ltd propose to develop a resort in a staged approach. In stage 1, the reception lounge and restaurant along with seven pairs of conjoined cabins (14 Cabin D) will be developed. In stage 2, the massage centre and twelve detached cabins (Cabin A) will be constructed and finally in stage 3, six additional detached cabins (Cabin A) will be constructed further west. All the cabins will be set back from the coastal boundary and the restaurant and massage centre will be located mid slope overlooking the cabins with woodland and ocean views. The Class 1b habitable buildings will be accessed from the north-east by a driveway directly off Connellys Marsh Road that will be greater than 200 m long. The assessment is based on the proposed site plan provided by Caliban Consulting (Appendix 2).

This bushfire report addresses the proposed 32 cabins and excludes the existing previously approved visitor accommodation cabin at the far west end of the site.

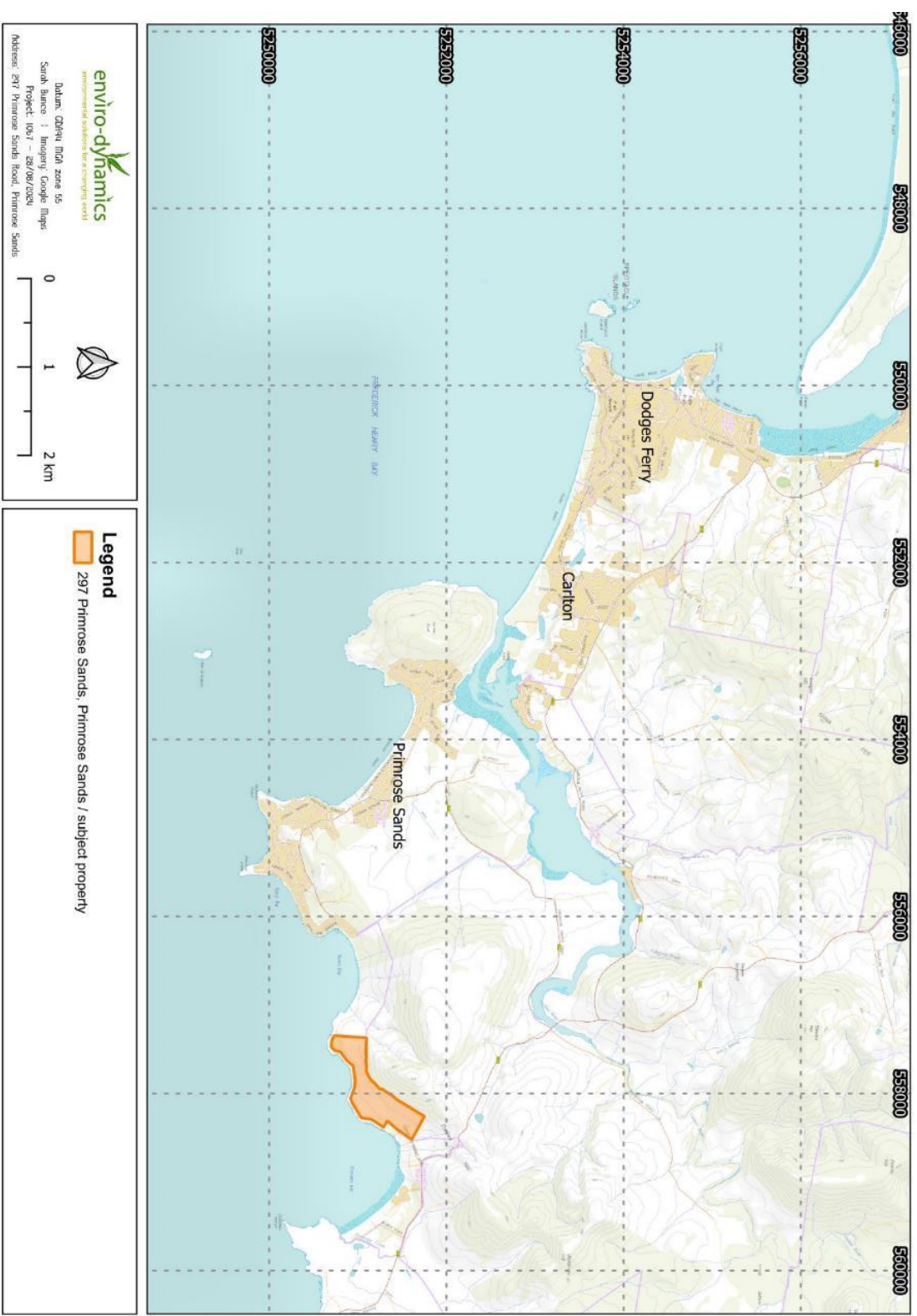


Figure 1 – Site location plan in SE Tasmania for 297 Primrose Sands Road (Image source: LISTmap 2024)

2.0 Bushfire Attack Level Assessment

The following is a summary of the bushfire risk at the property.

Bushfire Hazard

Factors contributing to bushfire hazard at this site include effective slopes of 5 to 10 degrees, with B. Woodland, D. Scrub and G. Grassland vegetation and fuel loads.

Bushfire Attack Mechanisms

Bushfire attack mechanisms at this site include radiant heat, ember attack, wind, direct flame, and smoke.

Bushfire Threat Direction

The highest bushfire threat to the proposed habitable buildings is from the grassland and woodland vegetation upslope to the north and east which are the prevailing wind directions during bushfire season.

There is also risk of bushfire to the fourteen type D cabins from nearby scrub downslope towards the coast. In addition, type A cabins with woodland vegetation downslope are at an increased risk of bushfire due to slope and relative proximity.

It is noted that the whole property burned during the 2013 Inala Road – Forcett bushfire and many of the mature woodland eucalypts are resprouting and recovering while many remain as dead stags.

Fire Danger Index

FDI 50 (this index applies across Tasmania).

Vegetation & Slope:

The site is generally paddock with scattered mature eucalypt trees across the area, as such most of the site is classified as G. Grassland.

The strip of coastal vegetation along the western portion of the site comprises low heath groundcovers and grasses with tall mature eucalypts and scattered shrubs. These areas are open and easy to walk through, as such the vegetation is classified as B. Woodland. This woodland vegetation is on 5-10° effective slopes within 100 m to the south and south-west of the type A cabins. The 5-10° slopes under vegetation to the south, south-east and south-west contribute to the risk of bushfire gaining speed from these directions. However, the risk of fire gaining speed from these directions is reduced because prevailing wind directions during bushfire season are from the north and east.

The strip of coastal vegetation in the eastern portion of the site is a mixture of species with vertical fuel continuity which is no taller than 4 m, except for the occasional emergent eucalypt. Based on this, the vegetation has been classified as D. Scrub. The scrub vegetation is on 5-10° effective slopes within 100 m to the south-east of the type D cabins. The 5-10° slopes under vegetation to the south-east contribute to the risk of bushfire gaining speed from this direction. However, the risk of fire gaining speed from this direction is reduced because prevailing wind directions are from the north and east during bushfire season.

Significant Natural Values:

No threatened flora species are recorded on the site (LISTmap 2024) nor during the natural values assessment (Enviro-dynamics 2019). The vegetation communities on the site are mapped as *Eucalyptus globulus* dry forest and woodland (DGL) and regenerating cleared land (FRG) to the west and agricultural land (FAG) across the remainder. During the bushfire assessment it was noted that there are pockets of recovering woodland (DGL) in the drainage lines and along the coast which can be seen in aerial photos.

None of the communities are listed as a threatened vegetation community under Schedule 3A of the *Nature Conservation Act 2002*.

The location of cabins and width of the hazard management areas in this report are recommended to protect the recovering vegetation, particularly the DGL community and ensure impacts resulting from bushfire hazard management measures are minimal.

Refer to Tables 1 to 8 for the summary of the BAL Assessment and Figure 2 for the 100 m BAL Assessment Area for the proposed visitor cabin accommodation and restaurant. It is noted that the sea is within 100 m to the east and south-east of all the cabins. As such, the total width of classified vegetation is less than 100 m in these directions. The width of vegetation is reflected in the column 'approximate width of classified vegetation' of the following tables.

Table 1 – Separation distances for proposed accommodation – Type D Cabins 1 to 8 (undeveloped)

Direction	Vegetation Classification #	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA for BAL 19
North	G. Grassland	Upslope	100 m	BAL FZ	10-<14	10 meters
East North-east	G. Grassland D. Scrub	>5-10° downslope	0-20 m 12-40 m*	BAL FZ	17-<25 31-<43	17 meters
South South-east	G. Grassland D. Scrub	>5 to 10° downslope	0-45 m 27-43 m*	BAL FZ	13-<19 24-<35	24 meters
West	G. Grassland	Across slope	100 m	BAL FZ	10-<14	10 meters

Table 2 – Separation distances for proposed accommodation – Type D Cabins 9 to 14 (undeveloped)

Direction	Vegetation Classification #	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA for BAL 19
North	G. Grassland	Across slope	100 m	BAL FZ	10-<14	10 meters
East	G. Grassland D. Scrub	>5 to 10° downslope	24-30 m 24-37 m	BAL FZ	17-<25 31-<43	24 meters
South South-east	G. Grassland D. Scrub	>5 to 10° downslope	22-100 m 41-52 m	BAL FZ	17-<25 24-<35	24 meters
West	G. Grassland	Upslope	100 m	BAL FZ	10-<14	10 metres

Table 3 – Separation distances for proposed accommodation – Type A Cabin 1 (undeveloped)

Direction	Vegetation Classification#	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA
North	G. Grassland	Across slope	0-100 m	BAL FZ	10-<14	10 metres
East	G. Grassland	>5 to 10° downslope	40-60 m	BAL FZ	13-<19	13 metres
South	G. Grassland	>5 to 10° downslope	40-70 m	BAL FZ	13-<19	13 metres
West	G. Grassland	Upslope	0-100 m	BAL FZ	10-<14	10 metres

Table 4 – Separation distances for proposed accommodation – Type A Cabins 2 to 8 (undeveloped)

Direction	Vegetation Classification#	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA for BAL 19
North	G. Grassland	Upslope	0	BAL FZ	10-<14	10 metres
East	G. Grassland	>5 to 10° downslope	0	BAL FZ	13-<19	13 metres
South	G. Grassland	>5 to 10° downslope	0	BAL FZ	13-<19	13 metres
West	G. Grassland	Across slope	0	BAL FZ	10-<14	10 metres

Table 5 – Separation distances for proposed accommodation – Type A Cabin 9 to 12 (undeveloped)

Direction	Vegetation Classification #	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA for BAL 19
North	G. Grassland	Upslope	0	BAL FZ	10-<14	10 metres
East	G. Grassland	Across slope	0	BAL FZ	10-<14	10 metres
South	G. Grassland	>5 to 10° downslope	0	BAL FZ	13-<19	13 metres
South-west	G. Grassland B. Woodland	>5 to 10° downslope	0 24-100 m	BAL FZ	13-<19 23-<32	23 meters
West	G. Grassland B. Woodland	Across slope	0 24-100 m	BAL FZ	10-<14 15-<22	15 metres

Table 6 – Separation distances for proposed accommodation – Type A Cabins 13 to 16 (undeveloped)

Direction	Vegetation Classification #	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA
North	G. Grassland	Upslope	0	BAL FZ	10-<14	10 metres
East	B. Woodland	Across slope	15-50 m	BAL FZ	15-<22	15 metres
South	G. Grassland	>5 to 10° downslope	0	BAL FZ	13-<19	13 metres
South-west	G. Grassland	>5 to 10° downslope	0	BAL FZ	13-<19	13 metres
West	B. Woodland	Across slope	15-50 m	BAL FZ	15-<22	15 metres

Table 7 – Separation distances for proposed accommodation – Type A Cabin 17- 18 (undeveloped)

Direction	Vegetation Classification #	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 19 (m)	Prescribed minimum HMA
North	G. Grassland	Upslope	0	BAL FZ	10-<14	10 metres
East	G. Grassland B. Woodland	>5 to 10° downslope	0 23 m	BAL FZ	13-<19 23-<32	23 metres
South	G. Grassland B. Woodland	>5 to 10° downslope	0 23 m	BAL FZ	13-<19 23-<32	23 metres
West	G. Grassland	Across slope	0	BAL FZ	10-<14	10 metres

Table 8 – Separation distances for proposed restaurant (Class 6 building NCC 2022) – (undeveloped)

Direction	Vegetation Classification [#]	Effective Slope under classified vegetation	Approx. width of classified vegetation (m)	Current BAL rating	Separation distance for BAL 12.5 (m)	Prescribed minimum HMA
North	G. Grassland	Across slope	140	BAL FZ	14-<50	14 metres
East	G. Grassland D. Scrub	>5 to 10° downslope	110 110-140	BAL FZ	19-<50 31-<100	19 metres
South	G. Grassland	>0 to 5° downslope	140	BAL FZ	16-<50	16 metres
West	G. Grassland	Upslope	140	BAL FZ	14-<50	14 metres

^A Vegetation is classified as per definitions in Table 2.3 of AS3959-2018

* **Exclusion** – As per definitions in paragraph 2.2.3.2 of AS3959-2018, an ‘Exclusion’ is provided by low threat vegetation and non-vegetated areas. At this site, exclusions exist within 100 m to the south and south-east of the proposed development in the form of (e) *non-vegetated areas, that is, areas permanently cleared of vegetation, including waterways, exposed beaches, and rocky outcrops.*

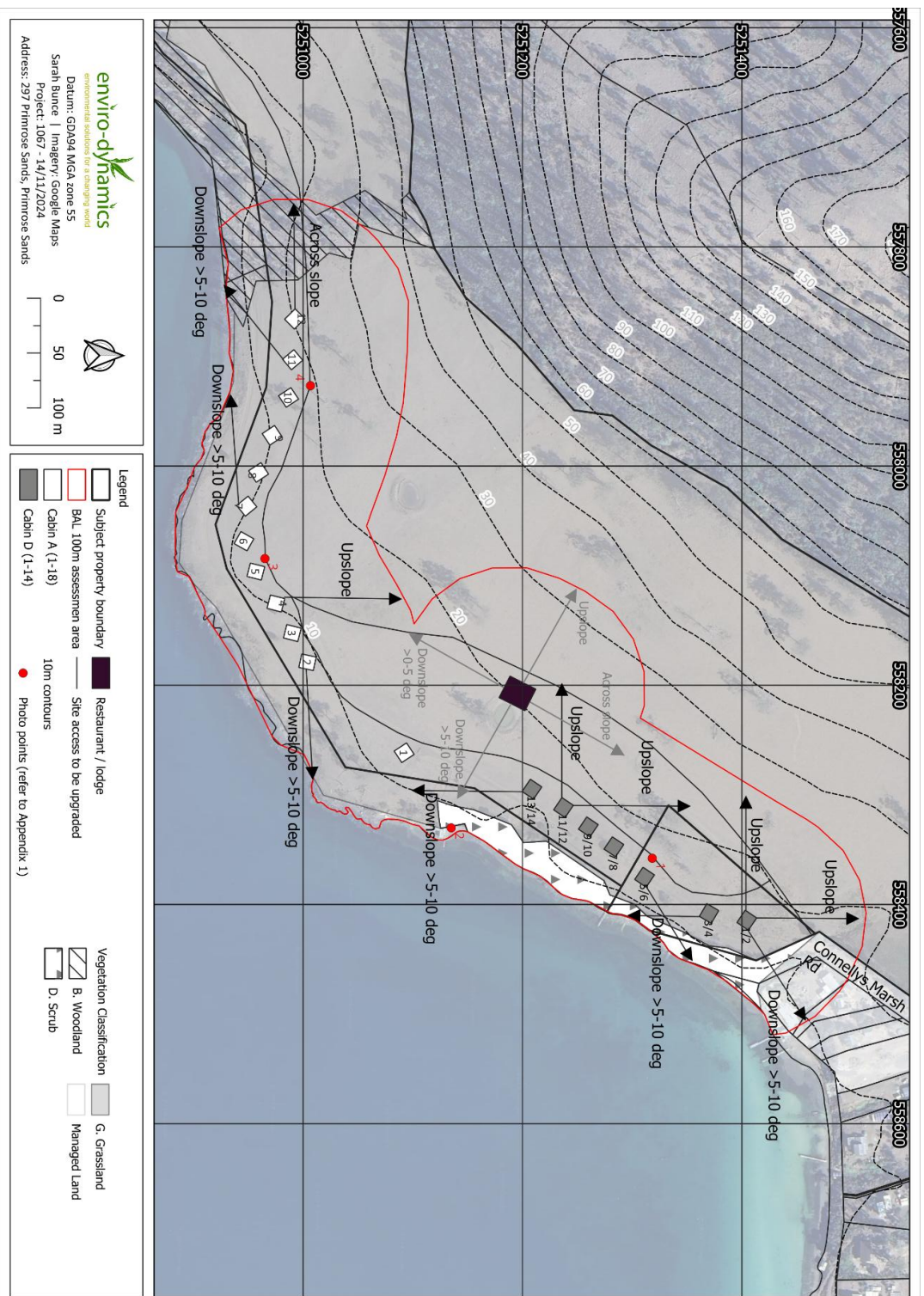


Figure 2 – 100 m radius BAL assessment area showing surrounding classified vegetation, effective slopes over 100 m and photo points at the proposed habitable Class 1b visitor accommodation cabins in the eastern portion of the site. Refer to Appendix 1 for photos. (Image source: LISTmap 2024)

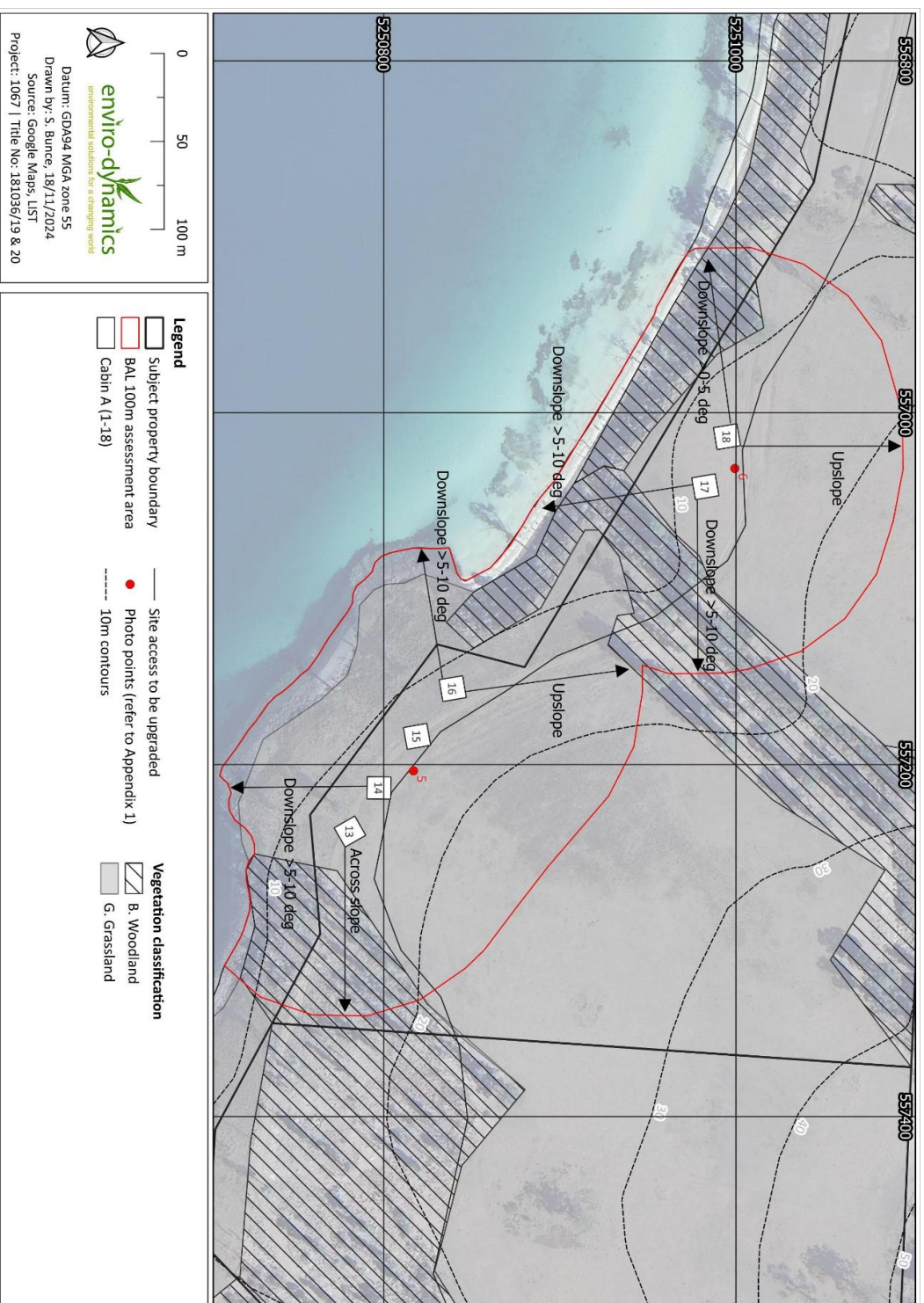


Figure 3 – 100 m radius BAL assessment area showing surrounding classified vegetation, effective slopes and photo points at the proposed habitable Class 1b visitor accommodation cabins in the western portion of the site. Refer to Appendix 1 for photos. (Image source: LISTmap 2024)

3.0 Bushfire Protection Measures

The site is within a designated bushfire-prone area as shown on the Sorell Interim Planning Scheme 2015 overlay. As such, to construct new habitable buildings on the lot, minimum standards must be met. The Deemed-to-Satisfy requirements are set out under Clause 4 and Tables 4.1 to 4.4 of the Director’s Determination.

The proposed habitable buildings on the pre-existing lot must comply with the following clauses of the Director’s Determination. Subject to implementing the BHMP, the shaded clauses in Table 9 have been determined to comply.

Table 9 – Compliance with requirements for building in bushfire-prone areas

CLAUSE			ISSUE (brief summary only)
2			Application of Requirements for Building in Bushfire-Prone Areas
3			Performance Requirements
		1 a	Design & construct to reduce ignition from bushfire
		1 b	Provided with access to assist firefighting and evacuation
		1 c	Provided with access to sufficient firefighting water supply at all times
		1 d	Provided with appropriate separation distance from bushfire hazard
4			Deemed-to-Satisfy Requirements
	4.1		Construction Requirements
	4.2		Property Access
	4.3		Water Supply for Firefighting
	4.4		Hazard Management Areas
	4.6		Emergency Plan

3.1 Construction Requirements (Clause 4.1)

The BHMP requires that the habitable buildings (Cabins A and D) be constructed to BAL 19 standards in accordance with either AS3959-2018 (Sections 3 and 6), or Standard for Steel Framed Construction in Bushfire Areas (NASH 2014).

Subject to implementing the BHMP, the proposal will comply with Deemed-to-Satisfy requirements of Clause 4.1.

3.2 Property Access (Clause 4.2)

The vehicular property access from a public road is required to be to within 90 m of the furthest part of the habitable buildings measured by a hose-lay, include access to the hardstand area for the firefighting water point, and meet the additional requirements outlined below.

Requirements

For a property access that is greater than 200 m long and provides access to more than three habitable buildings, the following design and construction requirements apply as per Table 4.2 Elements B and D of the Director's Determination:

- All-weather construction
- Load capacity of at least 20 tonnes, including for bridges and culverts
- Minimum carriageway width of 4 metres, and minimum vertical clearance of 4 metres
- Minimum horizontal clearance of 0.5 metres from the edge of the carriageway
- Cross falls of less than 3° (1:20 or 5%)
- Dips less than 7° (1:8 or 12.5%) entry and exit angle
- Curves with a minimum inner radius of 10 metres
- Maximum gradient of 15° (1:3.5 or 28%) for sealed roads, and 10° (1:5.5 or 18%) for unsealed roads, and
- Terminate with a turning area for fire appliances provided by one of the following:
 - A turning circle with a minimum outer radius of 10 metres
 - A property access encircling the building, or
 - A hammerhead "T" or "Y" turning head 4 m wide and 8 m long
- Passing bays of 2 m additional carriageway width and 20 m length provided every 100 m as a minimum. This provides a 6 m wide section of road for 2 vehicles to pass.

Additional requirements for firefighting appliance access are included in Section 3.3.

Current conditions

Fulham Road and Connellys Marsh Road will be used to access the property which are both Council maintained roads and deemed to meet minimal road construction standards.

The following upgrades are necessary to meet the preceding requirements:

- 3-4 m wide unpaved farm track exists through the lots (PID 210947/1, 181036/19 and 20). Refer to Appendix 1, Photo 14.
- the bridge between type A cabins 16 and 17 are also required
- the proposed new road to the proposed restaurant will need to meet the same requirements.

Compliance

The BHMP requires that the access complies with the design and construction requirements specified above for property access that is greater than 200 m long and provides access to 33 visitor accommodation cabins and a restaurant.

Subject to implementing the BHMP requirements, the proposal will comply with Deemed-to-Satisfy Clause 4.2.

3.3 Static Water Supply for Firefighting (Clause 4.3)

An adequate, accessible and reliable water supply for firefighting purposes must be supplied for the protection of life and property from the risks associated with bushfire.

Requirements

The lots are in an area that is not serviced by reticulated water therefore a static water supply for firefighting must be provided as per the following requirements from Clause 4.3 and Table 4.3B of the Director's Determination.

Distance requirements between building area to be protected and water supply:

- Building area to be protected must be located within 90 m of the firefighting water point of a static water supply
- The distance must be measured as a hose lay, between the firefighting water point and the furthest part of the building area.

Static water supply requirements:

- May have a remotely located off-take connected to the static water supply
- May be a supply for combined use (firefighting and other uses) but the specified minimum quantity of firefighting water must be available at all times
- Must be a minimum of 10,000 litres per building including associated Class 10 building or deck to be protected. This volume of water must not be used for any other purpose including firefighting sprinkler or spray systems
- Must be metal, concrete or lagged by non-combustible materials if above ground, and

- If a tank can be located so it is shielded in all directions in compliance with Section 3.5 of AS3959-2018, the tank may be constructed of any material provided that the lowest 400 mm of the tank exterior is protected by: metal, non-combustible material, or fibre-cement a minimum of 6 mm thickness.

Requirements for fittings, pipework and accessories associated with static firefighting water point (including stands and tank supports):

- Have a minimum nominal internal diameter of 50 mm
- Be fitted with a valve with a minimum nominal internal diameter of 50 mm
- Be metal or lagged by non-combustible materials if above ground
- If buried, have a minimum depth of 300 mm (compliant with AS/NZS 3500.1-2003 Clause 5.23)
- Provide a DIN or NEN standard forged Storz 65 mm coupling fitted with a suction washer for connection to firefighting equipment
- Ensure the coupling is accessible and available for connection at all times
- Ensure the coupling is fitted with a blank cap and securing chain (minimum 220 mm length)
- Ensure underground tanks have either an opening at the top of not less than 250 mm diameter or coupling compliant with these requirements, and
- Where a remote offtake is installed, ensure the offtake is in a position that is: visible, accessible to allow connection by firefighting equipment, at working height of 450 – 600 mm above ground level, and protected from possible damage, including damage by vehicles.

Signage for static water connections requirements:

- The water connection point for a static water supply must be identified by a sign permanently fixed to the exterior of the assembly in a visible location.
- Comply with water tank signage requirements within AS 2304-2011, or
- Comply with the Tasmania Fire Service (TFS) Water Supply Signage Guideline available on the TFS website.

Hardstand area for fire appliances required to:

- Be no more than 3 m from water connection point, measured as a hose-lay (including the minimum water level in dams, swimming pools and the like)
- Be no closer than 6 m from the building area to be protected
- Have a minimum width of 3 m and a minimum length of 6 m constructed to the same standard as the carriageway, and

- Be connected to the property access by a carriageway equivalent to the standard of the property access.

Current conditions

The site is not within a reticulated water supply area and there are no fire hydrants nearby. There is one compliant static firefighting water supply on site associated with the existing cabin at the far west end of the site which is more than 100 m from any of the proposed cabins. There are a few farm dams in the eastern portion of the site which were not full in May 2024.

Compliance

The BHMP requires the proposed accommodation cabins and restaurant must comply with static firefighting water supply requirements outlined above. Subject to implementing these requirements, the proposal will comply with all deemed-to-satisfy requirements of Clause 4.3.4.

3.4 Hazard Management Areas (Clause 4.4)

As defined by the Director's Determination, a hazard management area (HMA) is 'the area, between a habitable building or building area and the bushfire-prone vegetation, which provides access to a fire front for firefighting, which is maintained in a minimal fuel condition and in which there are no other hazards present which will significantly contribute to the spread of a bushfire'.

Requirements

The HMA requirements are outlined under Element D of Table 4.4 in the Director's Determination for the proposed accommodation building types. The new (Class 1b) buildings must be located on the lot to be provided with HMAs no smaller than the separation distances required for **BAL 19** as per Table 2.6 of AS3959-2018, or provided with a certificate from an accredited person that a bushfire hazard management plan provides, to the degree necessary, separation of the building from the bushfire hazard, appropriate resistance to ignition from bushfire, property access and water supply for firefighting. In addition, the accommodation buildings must have an HMA established in accordance with a certified bushfire hazard management plan.

The HMA provides a cleared space, or separation distance between the building and the bushfire hazard. Any vegetation in this area needs to be strategically modified and maintained in a low fuel state to protect buildings from direct flame contact and intense radiant heat thereby allowing them to be defended from lower intensity bushfires. Fine fuel loads must be minimal to reduce the quantity of windborne sparks and embers reaching buildings, reduce the radiant heat at the building, and halt or check direct flame attack.

Current conditions

Most of the building sites are grazed paddocks classified as G(i) Grassland with nearby mature blue gums (*Eucalyptus globulus*) classified as B. Woodland. While there is dense 4 m tall, closed vegetation classified as D. Scrub at the east end and regenerating forest classified as A. Forest and the west end. A farm vehicle track has been maintained in a passable condition from the eastern end to the existing visitor accommodation cabin B at the west end of the site.

Compliance

*An HMA with separation distances that comply with **BAL 19** is to be established and maintained around the proposed new habitable visitor accommodation as per Table 1 to Table 7 and the BHMP (Attachments 1-3). An HMA with separation distances that comply with **BAL 12.5** is to be established and maintained around the proposed restaurant as per*

Table 8 and the BHMP (Attachment 1). The restaurant may provide a safe place to shelter in case of bushfire.

- HMA to be established with minimum separation distances between the Class 1b habitable visitor accommodation type D cabins 1 to 8 and scrub vegetation of **24 m** to south and south-east. For the grassland vegetation to the north and west the separation distance will be **10 m** and **17 m** to the east (refer to Table 1).
- HMA to be established with minimum separation distances between the Class 1b habitable visitor accommodation type D cabins 9 to 14 and scrub vegetation of **24 m** to the east, south-east and south. For the grassland vegetation to the north and west the separation distance will be **10 m** (refer to Table 2).
- HMA to be established with minimum separation distances between the Class 1b habitable visitor accommodation type A cabin 1 to 8 and grassland vegetation of **10 m** to the north and west, and **13 m** to the east and south (Table 3 and Table 4).
- HMA to be established with minimum separation distances between the Class 1b habitable visitor accommodation type A cabins 9 to 12 and grassland vegetation of **10 m** to the north and east, and **13 m** to the south. For the woodland vegetation to the south-west the separation distance will be **23 m** and **15 m** to the west (Table 5).
- HMA to be established with minimum separation distances between the Class 1b habitable visitor accommodation type A cabins 13 to 16 and grassland vegetation of **10 m** to the north, and **13 m** to the south and south-west. For the woodland vegetation to the east and west the separation distance will be **15 m** (Table 6).
- HMA to be established with minimum separation distances between the Class 1b habitable visitor accommodation type A cabins 17 and 18 and grassland vegetation of **10 m** to the north

and west. For the woodland vegetation to the east and south, the separation distance will be **23 m** (Table 7).

- To achieve BAL 12.5 for an on-site refuge in case of bushfire, the HMA to be established with minimum separation distances between the Class 6 restaurant and grassland vegetation will be **14 m** to the north and west, **19 m** to the east and **16 m** to the south (
- Table 8).
- All groundcover vegetation within the HMA is to be kept short i.e., less than 100 mm tall.
- Some mature trees within the HMA may be retained or planted provided they are further than 10 m from the habitable buildings and restaurant and there is horizontal separation between the canopies (min 6 m) and low branches are removed to create vertical separation between the ground and the canopy. At this site, this relates to the existing mature blue gums (*Eucalyptus globulus*) across the site.
- Small clumps of shrubs can be planted within the HMA provided they are further than 10 m from the habitable building and there is separation between clusters (min 10 m).
- Non-combustible elements including driveways, paths and short cropped lawns are recommended within the HMA.
- Fine fuels (leaves bark, twigs) should be removed from the ground periodically (pre-fire season) and all grasses and pastures must be kept short (<100 mm).
- Fuels are reduced sufficiently, and other hazards are removed such that the fuels and other hazards do not significantly contribute to the bushfire attack.

HMA maintenance

The HMA must be maintained in a minimal fuel state at all times for bushfire protection mechanisms to be effective. An annual inspection and maintenance of the HMA should be conducted prior to the bushfire season. All grasses or pastures must be kept short (<100 mm) and any flammable fine fuels at ground level such as leaves, litter and wood piles must be suitably managed. Small clumps of established trees and/or shrubs may be maintained to trap embers and reduce wind speeds. In addition, fire protection measures such as fire pumps and sprinkler systems must be tested to ensure functionality.

3.5 Bushfire Emergency Plan – Clause 4.5

As this is proposed visitor accommodation, guests must be informed of what to do in case of bushfire.

Requirements:

A bushfire emergency plan (BEP) must be developed for the site which is:

- consistent with the TFS Bushfire Emergency Planning Guidelines, and
- endorsed by TFS or a person accredited by the TFS.

Compliance:

A BEP that complies with the preceding requirements is to be established and maintained in each cabin of the proposed accommodation development. The BEP will indicate the location of the alternative shelter-in-place refuge on the site and a BEP will also be located inside the restaurant.

4.0 Conclusions

The assessment of the bushfire risk of the proposed new habitable buildings at 297 Primrose Sands Road, Primrose Sands, has determined that it will satisfy the requirements of the Director's Determination for a **BAL 19** rating provided compliance with the following measures:

- Construction of the new Class 1b habitable buildings must comply with construction standards for **BAL 19** as defined in AS3959-2018 (Sections 3 and 6) to ensure a suitably defensible building. This is acceptable to the project building surveyor and appropriate as the development was approved and substantially commenced under the Sorell Interim Planning Scheme (2015).
- Property access to the building envelope must meet the specified requirements for design and construction as defined in Table 4.2 Elements B and D of the Director's Determination.
- The provision of static firefighting water supply to meet the requirements of Table 4.3B of the Director's Determination.
- The Hazard Management Area (HMA) must meet the requirements of Table 4.4 of the Director's Determination and the minimum separation distances as set out in Tables 1 to 8 and the BHMPs (Attachments 1-3).
- A Bushfire Emergency Plan must meet the specifications as per Section 3.5 of this report and Table 4.5 of the Director's Determination and be made available in all cabins and the restaurant.

In addition, the assessment of the bushfire risk of the proposed new restaurant to be used for shelter-in-place during bushfire at the site has determined that it will satisfy the requirements of the Director's Determination for a **BAL 12.5** rating provided compliance with the following measures:

- Construction of the new Class 6 restaurant building must comply with construction standards for **BAL 12.5** as defined in AS3959-2018 (Sections 3 and 5) to ensure a suitably defensible building.
- Property access to the building envelope must meet the specified requirements for design and construction as defined in Table 4.2 Elements B and D of the Director's Determination.
- Provision of static firefighting water supply must meet the requirements of Table 4.3B of the Director's Determination.
- The Hazard Management Area (HMA) must meet the requirements of Table 4.4 of the Director's Determination and the minimum separation distances as set out in Table 8 and the BHMP (Attachments 1).

5.0 Limitations of Plan

The protection measures outlined in the Bushfire Hazard Management Plan (Attachments 1-3) are based on a Fire Danger Index of 50 (FDI 50) which relates to a fire danger rating of 'very high'. Defending the property or sheltering within a structure constructed to AS3959-2018 on days when the fire danger rating is greater than 50 (i.e. 'severe' or higher) is not recommended.

Due to the unpredictable nature of bushfire behaviour and the impacts of extreme weather no structure built in a bushfire-prone area can be guaranteed to survive a bushfire. The safest option in the event of a bushfire is to leave the area early and seek shelter in a safe location.

6.0 Glossary and Abbreviations

AS – Australian Standard

BAL – Bushfire Attack Level – A means of measuring the severity of a building’s potential exposure to ember attack, radiant heat, and direct flame contact, using increments of radiant heat expressed in kilowatts per metre squared, and the basis for establishing the requirements for construction to improve protection of building elements from attack by bushfire (AS3959-2018).

BFP – Bushfire Practitioner – An accredited practitioner recognised by Tasmania Fire Service.

BHMP – Bushfire Hazard Management Plan – A plan for an individual habitable building or subdivision identifying separation distances required between a habitable building(s) and bushfire-prone vegetation based on the BAL for the site. The BHMP also indicates requirements for construction, property access and firefighting water.

Class 1b building – building is a boarding house, guest house or hostel that has a floor area less than 300 m² and ordinarily has less than 12 people living in it. It can also be four or more single dwellings located on one allotment which are used for short-term holiday accommodation (NCC 2019).

FDI – fire danger index – Relates to the chance of a fire starting, its rate of spread, its intensity, and the difficulty of its suppression, according to various combinations of air temperature, relative humidity, wind speed and both the long- and short-term drought effects (AS3959-2018).

ha – hectares

HMA – Hazard Management Area – The area, between a habitable building or building area and the bushfire-prone vegetation, which provides access to a fire front for firefighting, which is maintained in a minimal fuel condition and in which there are no other hazards present which will significantly contribute to the spread of a bushfire.

m – metres

ha - hectares

NASH – National Association of Steel Framed Housing

TFS – Tasmania Fire Service

7.0 References

AS3959-2018. Australian Standard for Construction of buildings in bushfire-prone areas. SAI Global Limited Sydney, NSW Australia.

Building Act 2016. The State of Tasmania Department of Premier and Cabinet.
<https://www.legislation.tas.gov.au/view/html/inforce/current/act-2016-025>

Building Act 2016. Director's Determination – Requirements for Building in a Bushfire-Prone Area (v2.2) DOC/17/62962. Director of Building Control
https://www.cbos.tas.gov.au/__data/assets/pdf_file/0011/405011/Directors-Determination-Requirements-building-bushfire-prone-areas.pdf

Building Regulations 2016. The State of Tasmania Department of Premier and Cabinet.
<https://www.legislation.tas.gov.au/view/html/inforce/current/sr-2016-110>

LISTmap 2024. Land Information System Tasmania, Tasmania Government.
<https://maps.thelist.tas.gov.au/listmap/app/list/map>

NASH 2014. *NASH Standard for Steel Framed Construction in Bush Fire Areas*. National Association of Steel Framed Housing Inc.

NCC 2022. *National Construction Code 2019 Vol Two, Building Code of Australia Class 1 and Class 10 Buildings*. Australian Building Codes Board, Australia.

SIPS 2015. *Sorell Interim Planning Scheme 2015*.
<https://www.iplan.tas.gov.au/pages/plan/book.aspx?exhibit=tasips>

Appendix 1 – Photos of site, surrounds and vegetation



Photo 1 – From Photo Point 1 – North from Cabin D (group 1-14) proposed habitable building site towards G. Grassland – upslope



Photo 2 – From Photo Point 1 – South-east from Cabin D (group 1-14) proposed building sites – downslope >5-10° under G. Grassland and under D. Scrub



Photo 3 – From Photo Point 1 – West from Cabin D (group 1-14) proposed habitable building sites towards G. Grassland – across slope



Photo 4 – From Photo Point 2 – West towards Cabin A-1 proposed building site – short downslope >10-15° under D. Scrub, which is similar to the short downslope south and south-east of Cabin D (group 1-14) under D. Scrub.



Photo 5 – From Photo Point 3 – North from Cabin A (group 2-12) proposed habitable building sites towards G. Grassland – upslope



Photo 6 – From Photo Point 3 – South from Cabin A (group 2-12) proposed habitable building site towards G. Grassland – downslope >5-10°



Photo 7 – From Photo Point 4 – West from Cabin A (group 2-12) proposed habitable building site – across slope under G. Grassland and downslope >5-10° under B. Woodland

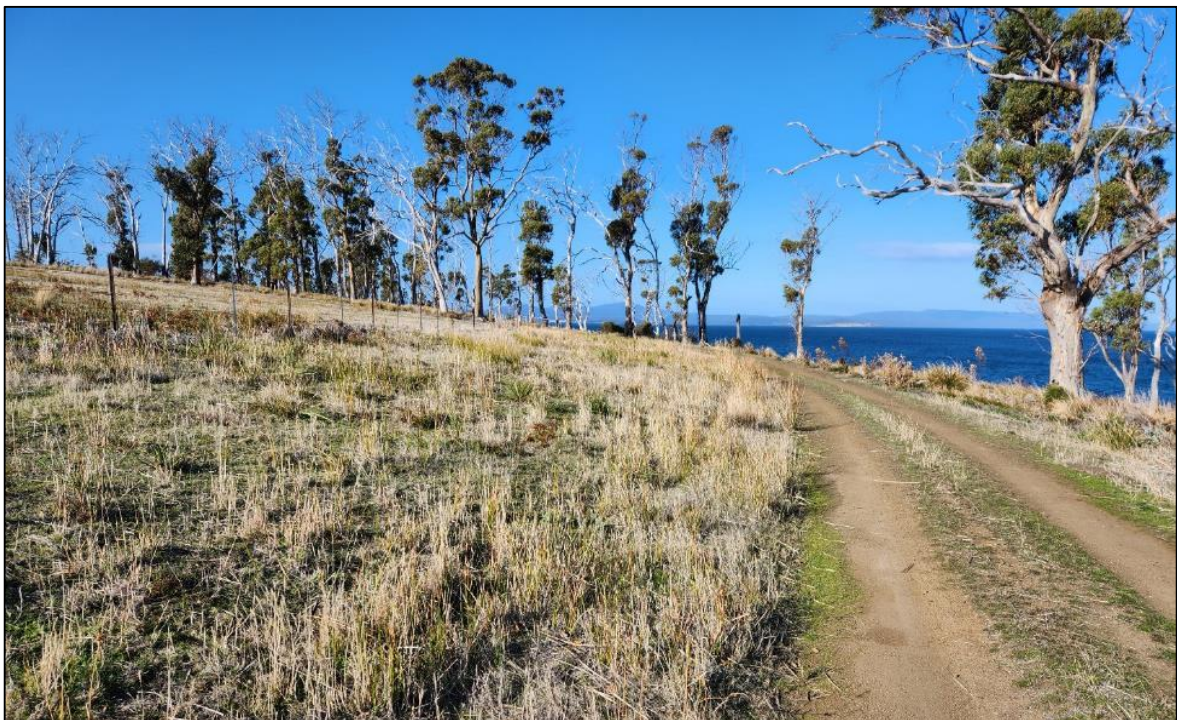


Photo 8 – From Photo Point 5 – East from Cabin A (group 13-16) proposed habitable building site – across slope under G. Grassland and B. Woodland



Photo 9 – Near Photo Point 5 – South from Cabin A (group 13-16) proposed habitable building site – downslope >5-10° under G. Grassland

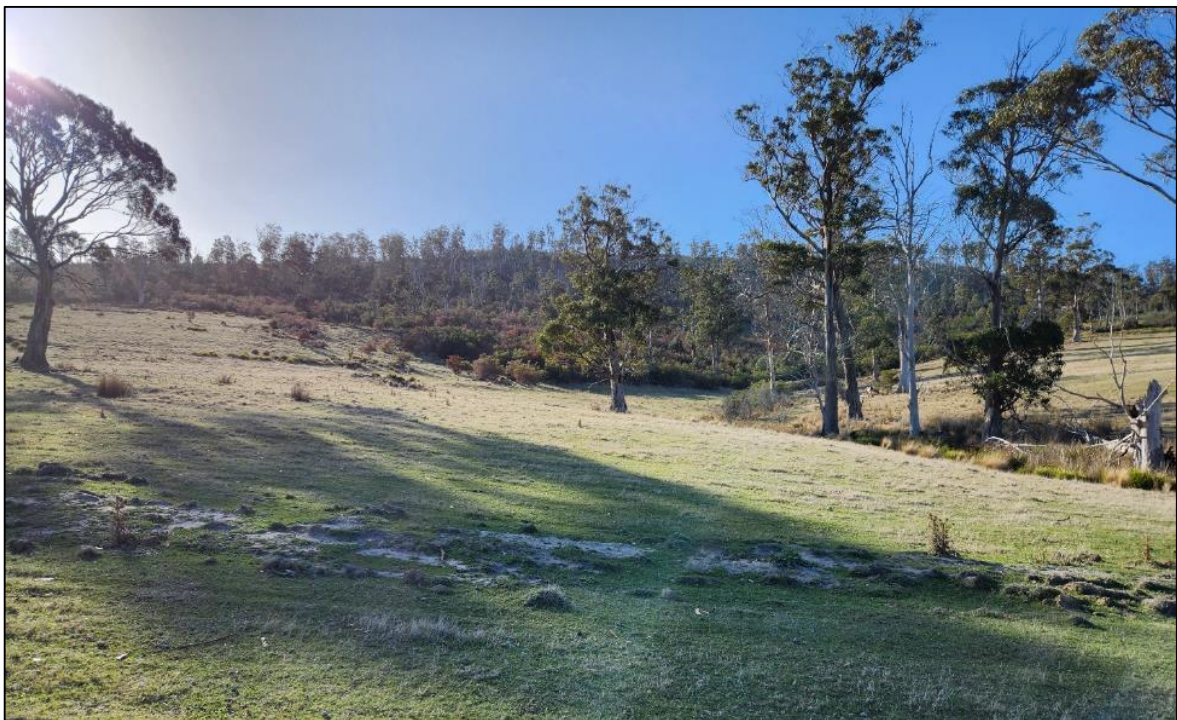


Photo 10 – From Photo Point 5 – North from Cabin A (group 17-18) proposed habitable building site – downslope >5-10° under G. Grassland



Photo 11 – From Photo Point 6 – East from Cabin A (group 17-18) proposed habitable building site – downslope >5-10° under G. Grassland and B. Woodland



Photo 12 – From Photo Point 6 – South from Cabin A (group 17-18) proposed habitable building site – downslope >5-10° under G. Grassland and B. Woodland

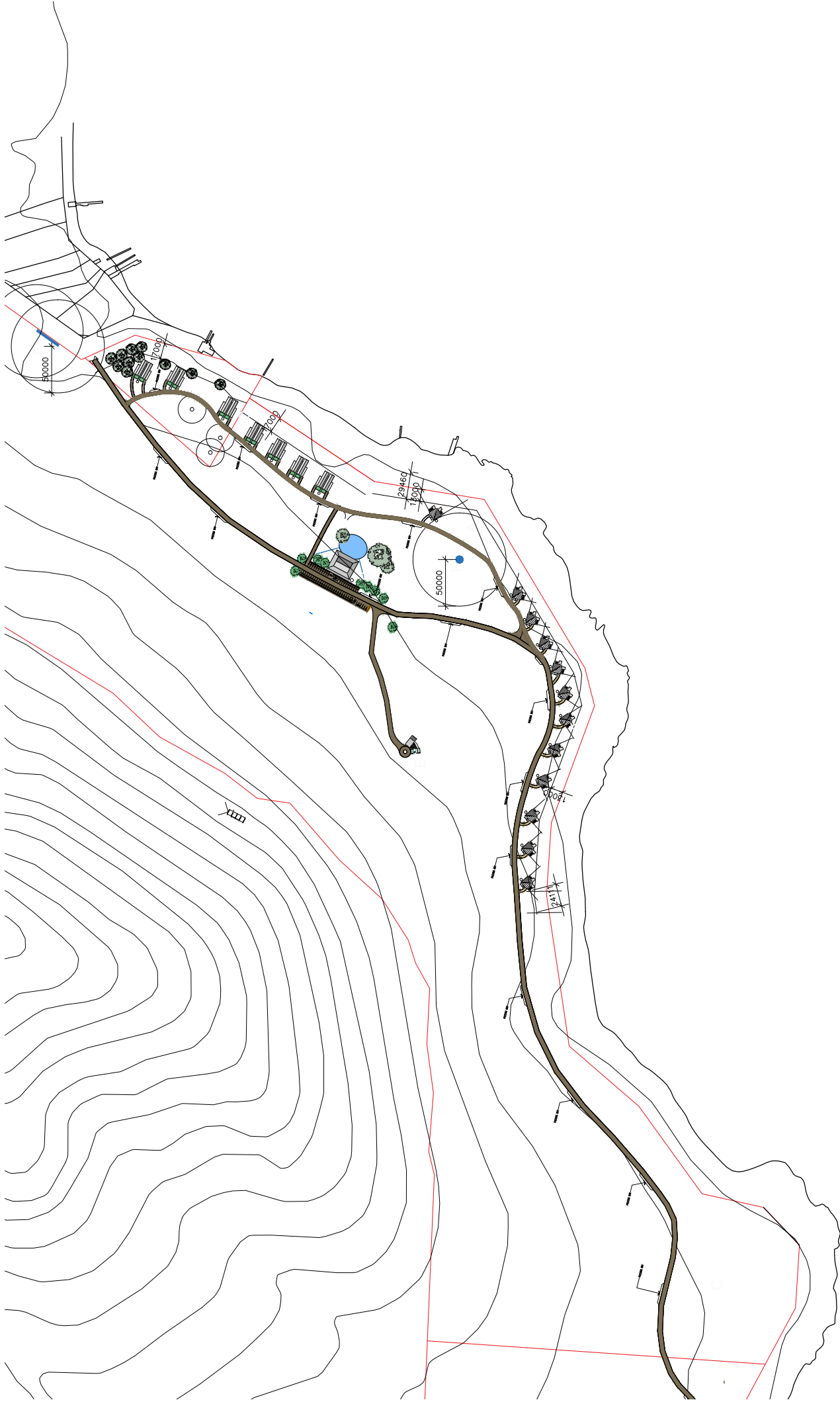


Photo 13 – From Photo Point 6 – West from Cabin A (group 17-18) proposed habitable building site – across slope under G. Grassland



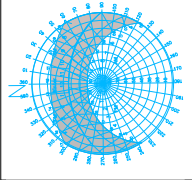
Photo 14 – Near Photo Point 1 – West along the existing western portion of private access that will be upgraded with passing bays as a driveway and firefighting equipment access

Appendix 2 – Master Plan (DWG ANB1 DA01 05/08/2024, Caliban Consulting)

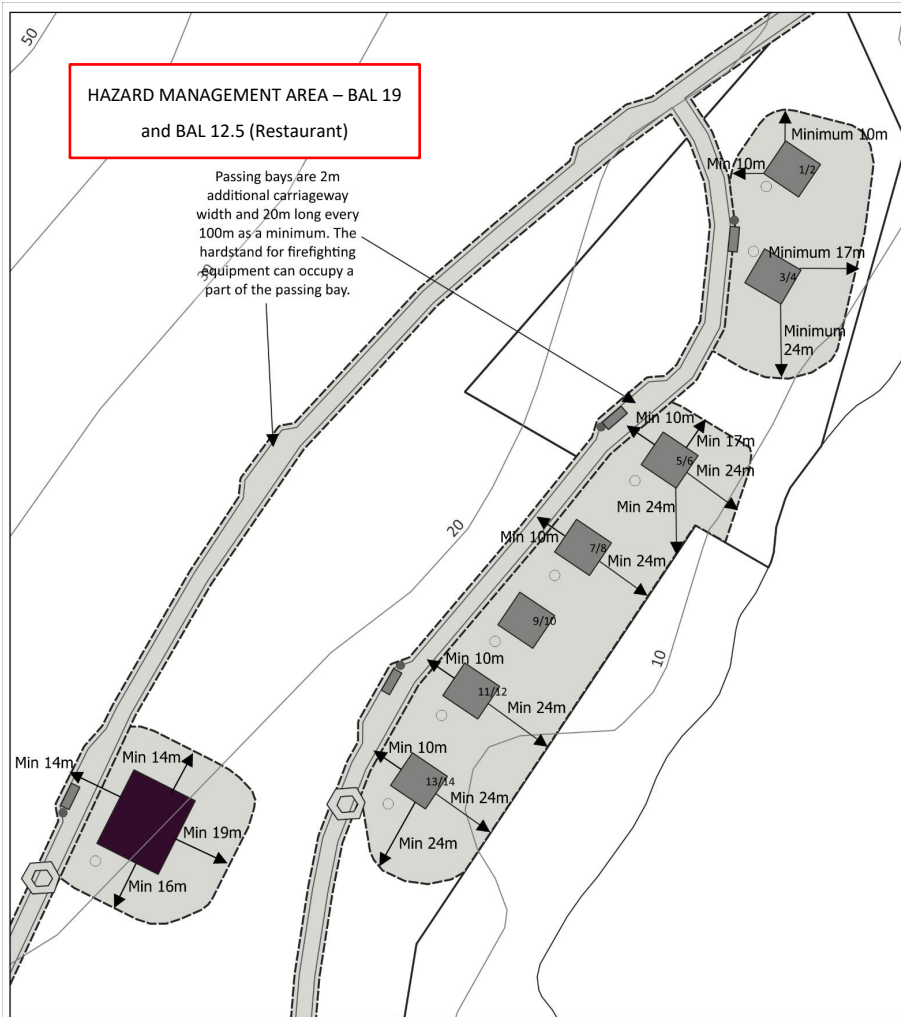


A. Cabin Type A	
B. The Lodge (reception /dining)	
C. Grave Site	
D. Cabin Type D	
E. Massage/Sauna Centre	
F. Aboriginal Heritage Site (refer ACHA for detailed assessment)	

Accommodation	
East:	
West:	
Total	



ATTACHMENT 1 – Bushfire Hazard Management Plan – Stage 1 eastern portion – November 2024



 enviro-dynamics environmental solutions for a changing world Scale: 1:1400 Datum: GDA94 MGA zone 55 Source: Google Maps Drawn by: S. Bunce 13/11/2024 Project: ED1063 Titles: 210947/1 and 181036/20	Legend [] Subject property boundary [] Hazard management areas (BAL 19 around visitor accommodation, BAL12.5 around restaurant and 0.5m from edge of carriageway). [] Cabin D [] Restaurant [] 4m wide access	[] Indicative location of firefighting equipment hardstand [] Indicative location of firefighting turning area for stage 1 [] Indicative locations of firefighting water (10,000L) [] Indicative locations for firefighting water supply offtakes 10m contours
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NOTES

Hazard Management Area

- HMA to be established to distances indicated in this plan and as set out in Tables 1 and 2 of Bushfire Attack Level Assessment for **BAL 19** Cabin D.
- HMA to be established to distances indicated in this plan and as set out in Table 8 of Bushfire Attack Level Assessment for **BAL 12.5** Restaurant.
- Vegetation in the HMA needs to be strategically modified and then maintained in a low fuel state to protect buildings from direct flame contact and intense radiant heat. An annual inspection and maintenance of the HMA should be conducted prior to the bushfire season. All grasses or pastures must be kept short (<100 mm). Fine fuel loads at ground level such as leaves, litter and wood piles must be minimal to reduce the quantity of windborne sparks and embers reaching buildings, and to halt or check direct flame attack.
- Some trees can be retained (or planted) provided there is horizontal separation between the canopies and low branches are removed to create vertical separation between the ground and the canopy. Small clumps of established trees and/or shrubs may act to trap embers and reduce wind speeds.
- No trees to overhang habitable building to prevent branches or leaves from falling on the building.
- Non-combustible elements including driveways, paths and short cropped lawns are recommended within the HMA.
- Fine fuels (leaves bark, twigs) should be removed from the ground periodically (pre-fire season) and all grasses or pastures must be kept short (<100 mm).

Construction Standards

- Class 1b buildings must be constructed to comply with BAL 19 (north, east, south and west elevations) as per AS3959-2018 (Sections 3 and 6).
- Restaurant (Class 6) building must be constructed to comply with BAL 12.5 (north, east, south and west elevations) as per AS3959-2018 (Sections 3 and 5).

Access Requirements

- Specified requirements for design and construction of access to habitable building site as per Table 4.2 Elements B and C of the Director’s Determination – specifications for access that is greater than 200 m long.

Water Supply Requirements

- Must meet requirements of Table 4.3B of the Director’s Determination to ensure an adequate, accessible and reliable static water supply for firefighting is supplied.

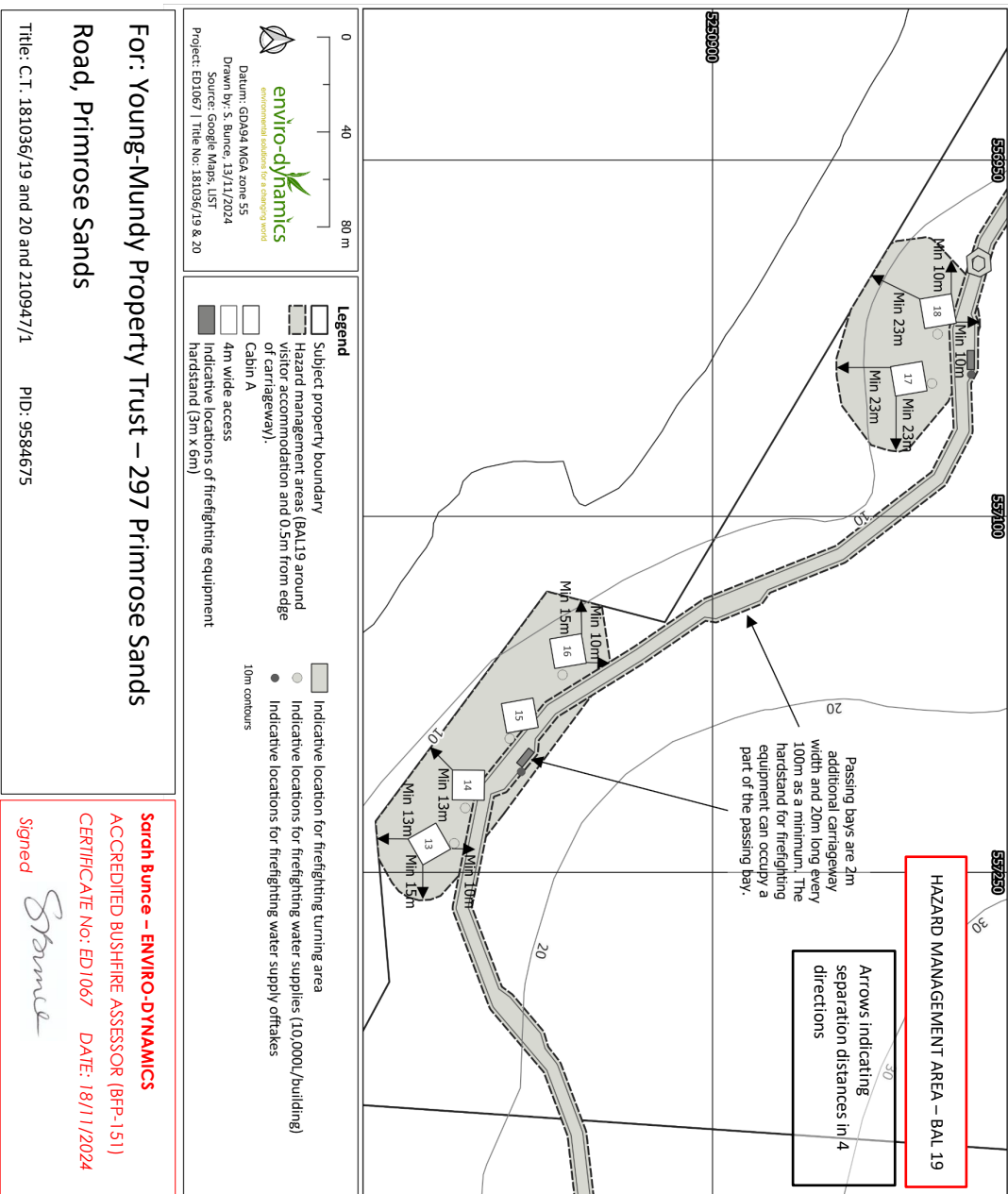
This plan is to be printed at A3 and read in conjunction with the Bushfire Hazard Report for proposed habitable building at 297 Primrose Sands Road, Primrose Sands (Enviro-dynamics, November 2024).

**For: Young-Mundy Property Trust – 297 Primrose Sands Road,
Primrose Sands**

Sarah Bunce – ENVIRO-DYNAMICS
 ACCREDITED BUSHFIRE ASSESSOR (BFP-151)
 CERTIFICATE No: ED1067 DATE: 18/11/2024

Signed *S. Bunce*

ATTACHMENT 3 – Bushfire Hazard Management Plan – Stage 3 western portion – November 2024



Sarah Bunce – ENVIRO-DYNAMICS
ACCREDITED BUSHFIRE ASSESSOR (BFP-151)
CERTIFICATE No: ED1067 DATE: 18/11/2024
Signed *Sarah Bunce*

NOTES

Hazard Management Area

- HMA to be established to distances indicated in this plan and as set out in Tables 6 and 7 of Bushfire Attack Level Assessment for **BAL 19**.
- Vegetation in the HMA needs to be strategically modified and then maintained in a low fuel state to protect buildings from direct flame contact and intense radiant heat. An annual inspection and maintenance of the HMA should be conducted prior to the bushfire season. All grasses or pastures must be kept short (<100 mm). Fine fuel loads at ground level such as leaves, litter and wood piles must be minimal to reduce the quantity of windborne sparks and embers reaching buildings, and to halt or check direct flame attack.
- Some trees can be retained (or planted) provided there is horizontal separation between the canopies and low branches are removed to create vertical separation between the ground and the canopy. Small clumps of established trees and/or shrubs may act to trap embers and reduce wind speeds.
- No trees to overhang habitable building to prevent branches or leaves from falling on the building.
- Non-combustible elements including driveways, paths and short cropped lawns are recommended within the HMA.
- Fine fuels (leaves bark, twigs) should be removed from the ground periodically (pre-fire season) and all grasses or pastures must be kept short (<100 mm).

Construction Standards

- Class 1b buildings must be constructed to comply with BAL 19 (north, east, south and west elevations) as per AS3959-2018 (Sections 3 and 6).

Access Requirements

- Specified requirements for design and construction of access to habitable building site as per Table 4.2 Elements B and C of the Director’s Determination – specifications for access that is greater than 200 m long.

Water Supply Requirements

- Must meet requirements of Table 4.3B of the Director’s Determination to ensure an adequate, accessible and reliable static water supply for firefighting is supplied.

This plan is to be printed at A3 and read in conjunction with the Bushfire Hazard Report for proposed habitable building at 297 Primrose Sands Road, Primrose Sands (Enviro-dynamics, November 2024).

CERTIFICATE OF QUALIFIED PERSON – ASSESSABLE ITEM

Section 321

Form **55**

To: Allure Lodges Pty Ltd
Young-Mundy Property Trust *Owner /Agent*

info@alluretasmania.com.au and
sebastian.mundy@alluretasmania.com.au *Address*

Suburb/postcode

Qualified person details:

Qualified person: Sarah Bunce

Address: 21 Bathurst Street *Phone No:* 0437 782 592

Hobart 7000 *Fax No:* NA

Licence No: BFP-151 *Email address:* Sarah.Bunce@enviro-dynamics.com.au

Qualifications and Insurance details: Accredited person under Part IVA of the Fire Service Act 1979 *(description from Column 3 of the Director of Building Control's Determination)*

Speciality area of expertise: Analysis of hazards in bushfire-prone area *(description from Column 4 of the Director of Building Control's Determination)*

Details of work:

Address: 297 Primrose Sands Road *Lot No:* 1, 19 and 20

Primrose Sands 7173 *Certificate of title No:* 210947/1 181036/19 & 20

The assessable item related to this certificate: New building (class 1b and class 6) work in bushfire prone area. *(description of the assessable item being certified)*
Assessable item includes –
- a material;
- a design
- a form of construction
- a document
- testing of a component, building system or plumbing system
- an inspection, or assessment, performed

Stage 1 – 14 accommodation units – Class 1b buildings and 1 restaurant – Class 6 building to be used as shelter-in-place refuge.
Stage 2 – 12 accommodation units
Stage 3 – 6 accommodation units for a total of 32 accommodation units - Class 1b buildings.

Certificate details:

Certificate type:

Bushfire Hazard

*(description from Column 1 of Schedule 1 of the Director of Building Control's Determination)*This certificate is in relation to the above assessable item, at any stage, as part of - *(tick one)*building work, plumbing work or plumbing installation or demolition work:

or

a building, temporary structure or plumbing installation:

In issuing this certificate the following matters are relevant –

Documents:

- Bushfire Hazard Assessment Report ED1067 – Enviro-dynamics Pty Ltd (Nov 2024)
- Bushfire Hazard Management Plan ED1067 – Enviro-dynamics Pty Ltd (Nov 2024)

Relevant

BAL assessed as per:

- AS3959-2018
- Sorell Interim Planning Scheme 2015

References:

- *Building Regulations 2016*
- *Director's Determination – Requirements for Building in Bushfire-Prone Areas (v2.2)*
- National Construction Code – Vol. 2 (NCC).
- AS3959-2018 Construction of Buildings in Bushfire Prone Areas

Substance of Certificate: (what it is that is being certified)

The proposal relies on a performance solution for water supply volume and as such the building surveyor is required to obtain a Chief Officer's Report prior to certifying compliance. Subject to implementation of the abovementioned Bushfire Hazard Management Plan, the development meets the deemed-to-satisfy requirements of the Director's Determination – Requirements for Building in Bushfire-Prone Areas (v2.2).

The requirements are:

- Design and construction of the Class 1b accommodation buildings must be to the minimum standard of BAL 19 as described in AS3959-2018.
- The HMA for the Class 1b accommodation buildings must meet BAL19 separation distance requirements. All HMAs will be contained within the property boundaries.
- The firefighting water supply will provide one 10,000 litre tank per building, or equivalent.
- The design and construction of the Class 6 restaurant must be to the minimum standard of BAL 12.5 as described in AS3959-2018 (Sections 3 and 5) because it may be used as a shelter-in-place refuge during bushfire. It will have a minimum of 10,000 litres of firefighting water, access and HMA in compliance with the Bushfire Hazard Report ED1067 – Enviro-dynamics Pty Ltd (Nov. 2024). No outbuildings will be less than 6m from the restaurant and all HMAs will be contained within the property boundaries.

Subject to implementation of the abovementioned Bushfire Hazard Management Plan, the development meets the Deemed-to-Satisfy Requirements of the Director's Determination – Requirements for Building in Bushfire-Prone Areas.

Scope:

The BAL Assessment was undertaken at the site to identify the bushfire risk and determine whether there was sufficient risk from bushfire (as a result of the proposed development) to warrant specific bushfire protection measures.

All bushfire hazard management measures comply with Building Regulations 2016, AS3959-2018 and the NCC (vol. 2).

Limitations:

- The BAL assessment relates to bushfire risk assessment carried out in May 2024 only.
- The assessor has taken all reasonable steps to ensure that the information provided in this assessment is accurate and reflects the conditions on and around the site and allotment on the date of this assessment.
- The recommendations made in the BAL assessment are based on the conditions of the site at the time of the assessment (May 2024). No liability will be accepted by the assessor for actions undertaken by the owners or others that compromise the effectiveness of the measures outlined in this assessment.
- The effectiveness of the bushfire safety measures outlined in the assessment are reliant on their implementation and ongoing maintenance.

I certify the matters described in this certificate.

	<i>Signed:</i>	<i>Certificate No:</i>	<i>Date:</i>
Qualified person:		ED1067	18/11/2024

AERIAL SNAPSHOT FROM THE LIST MAP OF THE ALLURE FARMLANDS (RIVERSIDE) WITH BOUNDARY IN RED



- The built footprint occupies a very small proportion of the approximately 700 hectare farm.
- Visibility of the development will be limited and predominantly from the water.

PROPOSED DEVELOPMENT SITE

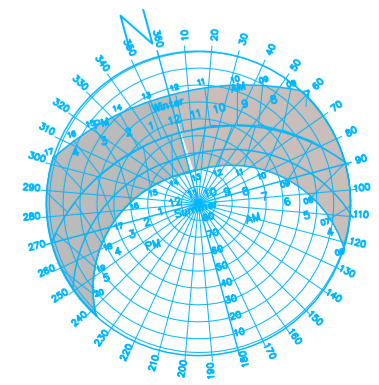
ORIGINAL PROPOSAL (ADVERTISED 2024)



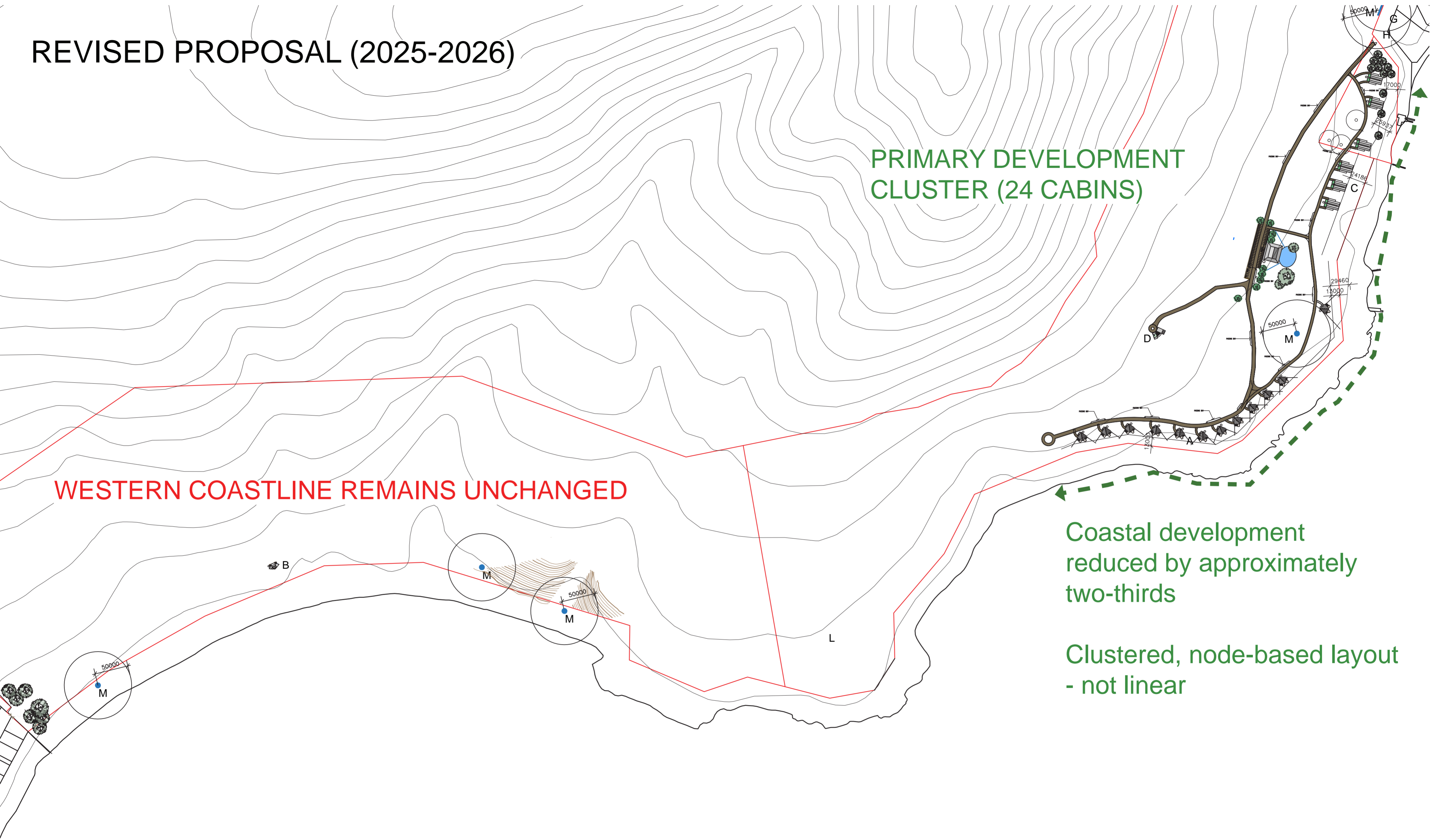
Existing cabin not included in DA

Cabins distributed across approximately 2.8km of coastline

- Linear coastal pattern
- Development extends across full western and eastern coastline



REVISED PROPOSAL (2025-2026)



PRIMARY DEVELOPMENT CLUSTER (24 CABINS)

WESTERN COASTLINE REMAINS UNCHANGED

Coastal development reduced by approximately two-thirds

Clustered, node-based layout - not linear

CALIBAN
CONSULTING

Contacts
Architect - John Lewis
Board of Architects of Tasmania No.1134
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Tasmania, 7190
0418 445 313

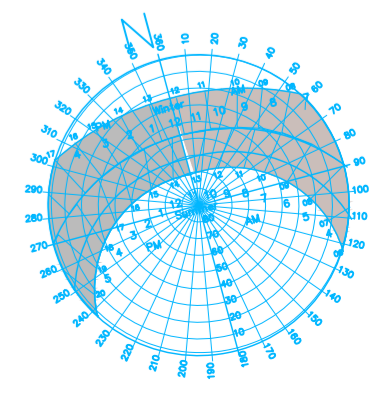
Drawing
No.: ANB1 DA01
Date: 13 April 2026
Scale: 1:2,500 @ A1

Accommodation
East: Cabin Type A 12
Cabin Type D 12
West: No new Cabins
Total 24
(excludes existing cabin)

Allure Norfolk Bay
Master Plan
vN
50 100 150 200 250 500

Key
A. Cabin Type A
B. Existing cabin (not included in development)
C. Cabin Type D
D. Massage/Sauna Centre
E. The Lodge (reception /dining)
F. Parking

G. Connellys Marsh Road
H. Allure Entry
J. Emergency Access only
K. Primrose Sands Rd
L. Grave Site
M. Aboriginal Heritage Site (refer ACHA for detailed assessment)



HOW PROPOSAL HAS CHANGED

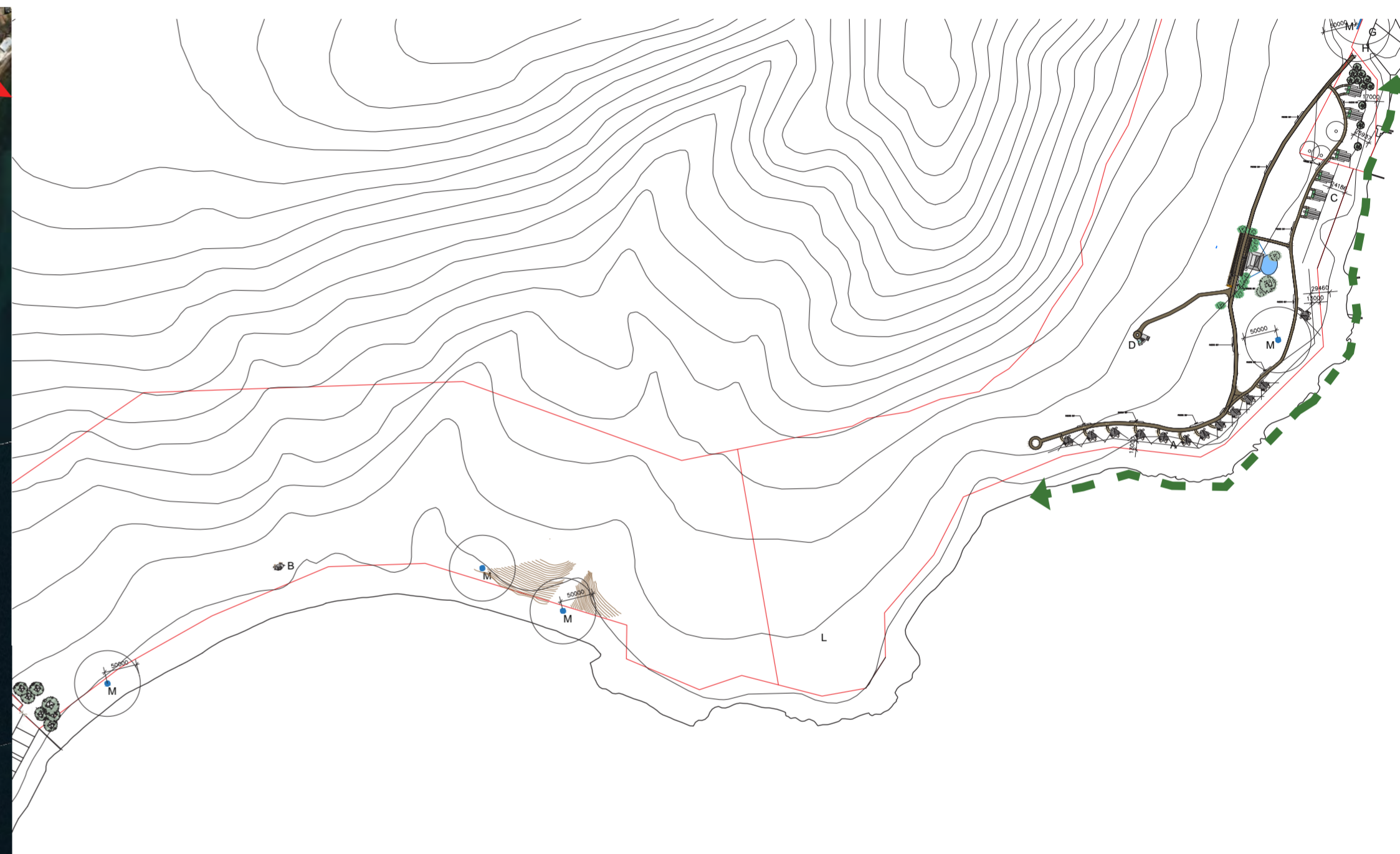
ORIGINAL PLAN



CALIBAN <small>CONSULTING</small>	Contacts Architect - John Lewis <small>Board of Architects of Tasmania No. 1134 Tasmanian Architect License 33352612</small> john.lewis@vetica.net PO Box 219, Orford, Tasmania, 7190 0418 445 313	Drawing No.: ANB1 DA01 Date: 6 Nov 2022 Scale: 1:2,500 @ A2 1:5,000 @ A4	Accommodation East: Cabin Type A 8 Cabin Type D 14 Cabin Type A 10 Cabin Type B 1 Total 33	
	Key A. Cabin Type A B. Cabin Type B C. Cabin Type D D. Massage/Sauna Centre E. The Lodge (reception /dining) F. Parking G. Connelys Marsh Road H. Allure Entry J. Emergency Access only K. Primrose Sands Rd L. Grave Site M. Aboriginal Heritage Site (refer ACHA for detailed assessment)			

(includes existing cabin B)

REVISED PLAN



CALIBAN <small>CONSULTING</small>	Contacts Architect - John Lewis <small>Board of Architects of Tasmania No. 1134 Tasmanian Architect License 33352612</small> john.lewis@vetica.net PO Box 219, Orford, Tasmania, 7190 0418 445 313	Drawing No.: ANB1 DA01 Date: 13 April 2026 Scale: 1:2,500 @ A1	Accommodation East: Cabin Type A 12 Cabin Type D 12 West: No new Cabins Total 24	
	Key A. Cabin Type A B. Existing cabin (not included in development) C. Cabin Type D D. Massage/Sauna Centre E. The Lodge (reception /dining) F. Parking G. Connelys Marsh Road H. Allure Entry J. Emergency Access only K. Primrose Sands Rd L. Grave Site M. Aboriginal Heritage Site (refer ACHA for detailed assessment)			

(excludes existing cabin)

- Proposal reduced from 32 - 24 cabins
- Development consolidated into eastern cluster
- Western coastline remains unchanged
- Significantly smaller area of the site proposed for development

Monday 13 April 2026

Attention: Planning Manager

Email: Shane.Wells@sorell.tas.gov.au

Dear Shane

RE: 5.2022.184.1 AT 297 PRIMROSE SANDS ROAD, PRIMROSE SANDS (CT210947/1, 181036/20 & 181036/19) WITH ACCESS FROM CONNELLYS MARSH ROAD FOR – ALLURE LODGES PTY LTD

In response to your email dated 9 April 2026 and earlier discussions, please find below a final submission for the above project, together with attachments of site plans for the project as advertised, final submitted site plan, comparison of the two plans and a google image of the farmlands to add context.

This submission is provided in response to Council's recent correspondence and discussions regarding:

- Development intensity
- Rural character
- Settlement pattern
- Amendments to the application

The purpose of this submission is to:

- Clarify the final form of the proposal
- Demonstrate how the revised design responds directly to issues raised
- Confirm that the application remains capable of assessment under the applicable planning framework
- Assist Council in completing its assessment on planning merit

Applicable Planning Framework

The application was lodged under the Sorell Interim Planning Scheme 2015 and remains a live application.

Accordingly, the proposal must be assessed under the planning scheme in force at the time of lodgement, consistent with the requirements of the Land Use Planning and Approvals Act 1993.

While the Tasmanian Planning Scheme has since come into effect, the assessment of this application is to be undertaken under the Interim Planning Scheme, which provides discretion to consider visitor accommodation where it is compatible with rural character and does not unreasonably impact agricultural use.

Final Development Form

The proposal has been materially refined since public exhibition in response to feedback from

Council and the community.

Final configuration:

- 24 visitor accommodation cabins (reduced from 32)
- 18 accommodation building footprints (reduced from 25)
- 20 total building footprints across the site, including: lodge and wellness building
- Two accommodation types: Type A and Type D
- All accommodation buildings are single storey (excluding minor ancillary loft within wellness building)

Key changes since advertisement:

- Removal of 8 cabins in total
- Removal of all cabins from the western extent of the site
- Consolidation of all accommodation within the eastern portion
- Relocation of 4 cabins from the western extent to the eastern portion of the site
- Removal of 1 entire Type D building (2 cabins) on the eastern site
- Removal of Primrose Sands Road access
- Reduction and containment of development footprint

Outcome:

- 100% of cabins are now located within the eastern portion of the site
- No new visitor accommodation is proposed on the western extent of the site.
- Coastal development extent reduced from approximately 2.8 km to approximately one-third of that extent

The submission represents a clear and substantial reduction in scale, spatial impact and visual presence.

Amendments and “Substantial Change”

Council has raised concern that the amended plans represent a “substantial change”.

Respectfully, the Applicant does not agree.

The relevant consideration is whether the amended proposal represents a fundamentally different development in terms of:

- Use
- Scale
- Impact

In this instance:

- The use remains unchanged
- The scale has been reduced (32 → 24 cabins)
- The accommodation footprint has reduced (25 → 18 buildings)
- The overall building count has reduced (27 → 20 buildings including lodge and wellness)
- The spatial extent has significantly contracted
- No new impacts have been introduced

The amendments:

- Respond directly to matters raised during assessment
- Reduce visual exposure and spatial spread

- Consolidate the development footprint
- Do not introduce any new planning considerations or impacts that would not have been reasonably anticipated at the time of public exhibition.

The proposal remains the same development in a reduced and more contained form.

The most recent refinement, involving the removal of the remaining two cabins from the western extent of the site, further reduces the footprint of the proposal and does not introduce any new impacts. It represents a continuation of the same design response, namely, reducing spread and consolidating development and directly addresses a concern raised by Council.

Rural Character and Settlement Pattern

Council has expressed concern regarding a perceived “linear” or “ribbon” settlement pattern.

Change in Form

The revised proposal now establishes a fully consolidated, clustered, node-based pattern of development, with all accommodation located within the eastern portion of the site. The western coastline is retained entirely in an undeveloped state. This represents a clear departure from any perception of a linear or ribbon development pattern.

Development is now:

- Consolidated within the eastern portion of the site
- Contained within defined areas
- No longer expressed as a continuous coastal strip

Reduction in Coastal Impact

- Coastal occupation reduced by approximately two-thirds
- Western coastline retained in an undeveloped state
- Development concentrated within a limited and defined portion of the site

Relationship to Existing Settlement

The eastern portion of the site adjoins:

- Existing coastal dwellings along Connellys Marsh Road
- A pattern of linear residential settlement along the foreshore

The proposal:

- Sits within and behind this established pattern
- Introduces lower density and more dispersed built form
- Maintains substantial spacing between buildings
- It does not establish a new settlement pattern. It sits within an existing one at a reduced intensity.

Scale Relative to Farm

- The built footprint occupies a very small proportion of the approximately 700 hectare farm.

Visual Character

- Limited visibility from Fulham Road due to distance and topography
- Filtered views from water
- Buildings integrated with landform and vegetation
- The development is visually recessive.

The proposal strengthens, rather than fragments, rural character by:

- Consolidating development
- Retaining large areas of undeveloped coastline
- Maintaining agricultural use
- The removal of all development from the western extent of the site ensures that the proposal is no longer expressed across the broader coastline, but instead reads as a contained and landscape-responsive cluster.

Agricultural Use and Agritourism Integration

The site will continue to operate as a commercial superfine merino sheep farm, including:

- Approximately 1,400 breeding ewes
- Ewe and lamb operations
- Supporting infrastructure eg shearing sheds, bore and pumping stations, silos, sheds, yards, ramps are unchanged

Grazing patterns and agricultural operations will continue unchanged.

Farm Viability

The proposal:

- Diversifies income
- Supports resilience in drought and low commodity cycles
- Ensures long-term viability of the land

Agritourism Integration

The development incorporates:

- Sheep shearing demonstrations
- Mustering and livestock management
- Farm-based experiences
- Horticulture and food production
- Direct interaction with farm animals grazing around buildings and access to the property managed with grates

These activities are genuine agricultural functions, not ancillary tourism features.

Agriculture remains the primary land use, supported by tourism

Regional Integration and Paddock-to-Plate Model

The South-East region possesses the foundational elements of a premium artisan food and beverage destination but remains under-recognised.

This proposal will play a catalytic role in:

- Connecting with existing producers
- Elevating regional identity
- Supporting sustainable agriculture
- Enhancing tourism outcomes

The proposal is embedded within a network of producers across South-East Tasmania. It will:

- Prioritise local procurement
- Showcase regional produce
- Support local supply chains

- Integrate on-site agricultural production

The regional integration model is intended as a real operational approach rather than a conceptual aspiration. The development is structured to:

- Prioritise local sourcing as a core operating principle
- Establish ongoing supplier relationships
- Integrate regional products into dining and guest experiences
- Importantly, the model is supported by on-site agricultural production from commencement, ensuring operational viability independent of external partnerships.

Socio-Economic and Regional Benefit

The South-East Tasmania region is characterised by:

- Lower median incomes and higher welfare reliance
- Lower tertiary education rates
- Limited local employment opportunities
- Higher reliance on seasonal or tourism employment
- Seasonal tourism patterns
- Lower economic yield per visitor

compared with most parts of the State.

This proposal responds directly to these conditions by introducing a high-value, experience-based tourism model integrated with ongoing agricultural use.

High-Value, Low-Impact Model

Based on the revised proposal of 24 cabins, with:

- Double occupancy
- Average annual occupancy of approximately 75% (conservatively)

The development is expected to generate:

- Approximately 6,570 occupied cabin nights per annum
- Approximately 13,140 guest nights per annum

Ancillary Expenditure

In addition to accommodation revenue, guests are expected to contribute to the regional economy through:

- Dining and paddock-to-plate experiences
- Local produce and farmgate offerings
- Tours, tastings and curated experiences
- Transport and other services

On a conservative basis, this additional expenditure is estimated between \$100 to \$200 per day or \$1.31 to \$2.63 million per annum.

Regional Economic Outcomes

Importantly, this level of economic activity is generated from a relatively modest number of visitors, reflecting a deliberate shift away from volume-based tourism.

The proposal will:

- Increase economic yield per visitor
- Extend average length of stay
- Support year-round visitation
- Strengthen local businesses and producers
- Encourage further investment in the region

Local Economic Integration

The development is structured to:

- Prioritise local procurement across food, beverages and produce
- Support regional producers and suppliers
- Create opportunities for local employment
- Encourage micro-enterprises and experience-based offerings

This ensures that a significant proportion of visitor expenditure is retained within the local economy.

Strategic Position

The proposal represents a high-value, low-impact tourism model.

One that:

- Generates substantial regional economic benefit
- Does not rely on high visitor volumes
- Supports the long-term viability of rural land use and a more resilient and productive rural economy.

Conclusion

The proposal, as now presented represents a clear and deliberate refinement of the originally advertised development:

- It reduces scale
- Removes development from the western coastline entirely
- No longer exhibits a linear or ribbon settlement pattern
- Consolidates built form
- Reduces impact
- Maintains agricultural dominance of the landholding
- Integrates with and supports the regional economy
- Is consistent with the intent of the Interim Planning Scheme
- Directly addresses Council and community raised concerns

The result is a contained, low-impact, agriculturally integrated development that is capable of approval under the Interim Planning Scheme.

Request

The Applicant respectfully requests that:

- The application be assessed and determined on its merits
- Having regard to the revised form of the proposal and its consistency with the Interim Planning Scheme

Kind Regards

Jacinta Young

Jacinta Young

Chief Executive Officer

Allure Tasmania