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EJB: VAB: FM 7889 L1

7/08/26

The Secretary
Save Mt Lofty Inc

Attention. Mr Chris Meibusch

Project; Proposed Development

2A Rifle Range Road
Mt Lofty

RECEIVED
07/08/2026
TOOWOOMBA
REGIONAL COUNCIL

Dear Sir

We, Eldon Bottcher Architects as competent persons have been requested to review the Bushfire Hazard Issues and the Bushfire Mitigation Report prepared by Land and Environment Consultants on the property noted above.

To assist in the review, we have conducted an independent review of the site and compared our findings with those of the report. A copy of that report entitled Bushfire Report FM 7889 has been provided to you as verification of our findings.

That report provides substantial support material referenced in this letter

It is our opinion that the report underestimates the hazard impacting the site and the potential impacts on not only the proposed future residents, but also to those existing.

I have also been provided with mapping and aerial photos supplied by Toowoomba City Council. Those have been provided as part of the supporting report.

In making my findings, I have been concerned by several issues in relation to both the report and the information provided by council: -

Report

- 1 In assessment of the Bushfire Hazard, the Gorge to the east of the site has not been assessed correctly.
- 2 The impact of the proposed rehabilitation on the site has been understated
- 3 The future impact of the proposed rehabilitation of the rifle range has not been addressed.
- 4 The fire weather patterns in the area have not been addressed
- 5 The assessment of fire history in the area has been understated
- 6 Fire Fighter Access has not been addressed fully.

Council Documents

- a The bushfire Hazard plan provided has the substantial Very High Hazard areas masked by other overlays on the same plan.

Report

1

The provided LEC BFMP calculates Hazard across several areas, numbered BAU 1 to BAU 4, with the eastern gorge area called up as BAU 3.

The calculations for this area use a slope of 11°, whereas the gorge has a slope of approximately 36 degrees. Based on the inputs in the report, this is called up as a High hazard area, where as calculation using the correct slope confirms State Mapping in that this is a Very High Hazard Area.

2

The site area being rehabilitated has historically been managed vegetation, as has the rifle range area adjoining- source Council provided aerial photo.

The proposed rehabilitation seeks to extend the Koala Habitat area, with a eucalypt woodland.

Bushfire Resilient Communities, which is referenced in several areas of the LEC Report is quite clear:-

The requirements of “*Bushfire Resilient Communities Technical Reference Guide for the State Planning Policy State Interest*” *Natural Hazards, Risk and Resilience-Bushfire*” published by QFES and Queensland Government, and “*Natural hazards, risk and resilience-Bushfire-Assessment Benchmark 5*” which cites a maximum Fuel Load of 8t/ha for revegetation or rehabilitation within bushfire prone areas.

VHC 9.2, as identified in the report has a fuel load of 17.2t/ha, more than twice that cited by BRC as being suitable for rehabilitation in a Bushfire Hazard Area.

This is increasing the overall vegetation mass to be subjected to future bushfire. As well as impacting the future buildings to be built on the site it potentially introduces a vegetation mass to existing buildings not designed to mitigate the increased Hazard and subsequent risk.

There is a discrepancy between the Environmental Report and the Bushfire Mitigation report in the identification of vegetation along the Northern Boundary, in that the Bushfire Report calls up the vegetation and Rainforest, whilst the environmental report calls. Consequentially an independent assessment was commissioned with that report provided in the Bushfire Report FM 7889.

An important factor is the identification of the area identified as Rainforest be the LEC report as being Privet.

There is the potential that privet will exacerbate the Bushfire threat in dry times-see Appendix 4.3.14 of Bushfire Report FM 7889.

3

The submitted report deals with the Rifle Range area as an area that will continually be managed. The historical aerial photo provide by Council shows a substantial increase in vegetation mass between the time of taking the photo and status.

It is our understanding that the Rifle Range ownership was transferred to ARTC (Inland Rail) in 2024 with the Toowoomba Chronical 9th January 2025 reporting: -*"The vast majority of the land will be used as an environmental offset property, enabling Inland Rail to provide offsets for environmental impacts on other parts of the Gowrie to Kagaru (G2K) section," an Inland Rail spokesman said. "Inland Rail will let the land being used for environmental offsets to regenerate to meet offset requirements for the G2K project, there will be very little ground disturbance on the environmental offsets land"*

It is clear from this article that it is inappropriate to consider that the rifle range is VHC 40.4 or VHC 41.4 and more appropriately should be considered as VHC 9.2 or similar.

The predominate mapped Regional Ecosystem in this area is RE 12.8.14, which is VHC 9.2. State Government Guidelines for Fire Management of this RE is *"INTENSITY: Plan for low to moderate. Unplanned occasional high intensity wildfire will occur. Regular fire will mitigate impact of severe fire. INTERVAL: Most fire intervals expected to be 2-5 years...."*. See Bushfire Report FM 7889 appendix 4.3.10.

4

The predominate wind direction is from the South East. In times of severe fire weather, the wind direction will be from the North West through to South West. The Topography will create microclimates, which will cause swirling, which will modify the apparent wind direction according to primary direction and velocity. The swirl effect will transfer wind from the west into an under-swirl pattern transforming a westerly wind into an easterly wind. The converging formation of the gorge in Jubilee Park to the east will concentrate the wind effect with the potential of substantial exacerbation of bushfire attack mechanisms, in particular wind, ember and flame length.

5

The LEC report, section 4.2 *"Fire History"* briefly describes a fire history and cites that it is *"considered possible that the proposed development could be exposed to bushfire attack in the area."*

Fire scar mapping – source Qld Globe- shows a substantial fire history in the area, with fires directly impacting the site in 1987,1991,1992,1994,1995,1997,2000,2003,2005,2007, 2011,2012.

This is a substantial history of Bushfire, with years 2000 and 2003 being having the potential of being call “Catastrophic”

I would suggest that to say that it is “considered possible” is not representative of the fire history in the area, and given what appears to have been a break in the regular pattern since 2012, it is highly probable that there will be another substantial fire in the area sooner rather than later.

State Government recommendations are that “*Unplanned occasional high intensity wildfire will occur. Regular fire will mitigate impact of severe fire. INTERVAL: Most fire intervals expected to be 2-5 years*”
6

The submitted Bushfire report does not provide for Fire Fighter access to the northern boundary, noting that threat vegetation occupies the existing road reserve and there is no documented intention to develop that road access. Pedestrian fire trail access protected by an easement should be located on the northern boundaries or edge of threat vegetation of all the northern lots. This trail should be covered by an easement. See sample easement document provided in Bushfire Report FM 7889

Council Documents

a

Council has provided several documents among which are

i

An historical aerial photo “*Attachment 4-2-1946 Historical Site Imagery*”.

Comparison with more recent photos shows a substantial increase in vegetation in this area which has substantially increased the fire risk to the residential areas of the city.

Proposed rehabilitation on the subject site and the use of the former rifle range as “Offset Planting” raises the distinct probability of introducing “high intensity wildfire” to areas that have not been designed to mitigate this risk.

This raises the potential of substantial property damage and loss of life.

ii

Council has also provided a State Government plan entitled “*Attachment 5-3-SPP Mapping (Matters of State Environmental Significance and Bushfire Prone Area*”

This attachment includes other overlays which substantially mask the adjoining areas mapped as “Very High Bushfire Hazard”, potentially providing an incorrect concept of the actual mapping, noting that this is then exacerbated by the LEC report that does not have a correct assessment of the hazard to the gorge area.

I have substantial concerns that the threat from bushfire is substantially higher than that portrayed in the LEC report, with potential detrimental consequences for the potential future residents as well is to existing residents.

In support of our status as” Competent “to make this assessment we enclose a resume of the experience and qualifications of the personnel employed by our company.

Signed

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Eldon Bottcher
Grad. Dip. DBPA (UWS) Dip. Arch. (QIT), Cert. R.F.M. (USQ), F.R.A.I.A., M.A.I.E.S. AIFireE
Architect
BPAD-L3 Practitioner



ELDON BOTTCHER

EDUCATION AND QUALIFICATIONS

Graduate Diploma in Design in Bushfire Prone Areas

University of Western Sydney

Diploma in Architecture

Queensland Institute of Technology

Certificate of Rural Fire Management

University of Southern Queensland

Registered Architect

Queensland

A+ Architect

Australian Institute of Architects

FPA Australia Certified Practitioner (BPAD-Level 3-16935)

Bushfire Planning and Design (BPAD-LEVEL 3),
Alternate Solutions & DTS

PROFESSIONAL MEMBERSHIPS

Fellow

Australian Institute of Architects

Member

Australian Institute of Emergency Services

Member

Australian Institute of Engineers Society of Fire Safety

Member

Queensland Environmental Law Association.

Member Board of Experts

Bushfire Building Council of Australia

Associate Member

Institution of Fire Engineers

Corporate Member

Fire Protection Association of Australia

PROFESSIONAL EXPERIENCE

Director

Eldon Bottcher Architect Pty Ltd since 1978

Bushfire Assessment and Planning Consultant since 1998 with Involvement in more than 6,000 Bushfire Mitigation Projects ranging from single dwellings to major subdivisions, burn plans and general mitigation advice.

Group Officer

Albert Rural Fire Brigades Group
Queensland Fire and Rescue Service

Group Officer

Gold Coast Rural Fire Brigades Group
Queensland Fire and Rescue Service

Group Officer

South East Regional Support Group
Queensland Fire and Rescue Service

Planning Officer

Gold Coast Rural Fire Brigades Group
Queensland Fire and Rescue Service

Life Member

Guanaba Rural Fire Brigade

Member

Clagiraba Rural Fire Brigade

Member Practice Committee AIA Qld Chapter

AIA Qld Chapter advisor to AIA National to NCC

AIA delegate to Building Industry and Research Consultation Panel on Bushfire Hazard advising Queensland State Bushfire Committee

BBCA representation to Australian Standards Committee FP20 (AS 3959 & AS 5414)

Research Consultant to Queensland University of Technology Scenic Rim Black Saturday Recovery Project

OTHER BUSHFIRE RELATED COURSES AND TRAINING

I.C.S./AIFS (40 hr. course) in Incident Command Systems

Certificate 4 (Workplace Training and Assessment)

RFSQ Level 1

RFSQ Level 2 (Officer)

RFSQ Fire Management 1

RFSQ Crew Leader

Certificate II in Public Safety (Firefighting Operations)

Fire Weather 1

QELA Expert Witness Workshop 2020

BUSHFIRE RELATED AWARDS

National Planning Award

State Planning Award

Planning Institute of Australia

Gold Coast Bushfire Management Strategy

(Co-Initiator and Member of Preparation Committee)

Australian Government

National Medal

Long and Distinguished Service to Fire fighting

Queensland Fire and Rescue Service

Diligent and Ethical Service Medal + Clasp

Service to Fire fighting

Queensland Government

Australia Day Medallion

Services to Rural Fire Fighting

Queensland Government

Year of the Volunteer Medallion

Services to Fire fighting

UDIA

Best Consultancy Team Award in 2007.

SERVICES OFFERED

Bushfire management Reports

Bushfire Safety Engineering

Bushfire Planning and Design

Bushfire Hazard Assessment

Alternative Solutions

Expert Witnessing

(See Planning and Environment Court of Queensland Determination

File No. BD 624 of 2005 sections 28 to 35)

Continuing Professional Development Lectures

Tertiary Education Lectures and Tutorials

Town Planning Bushfire Codes for Local Authorities

Bushfire Burn Planning

General consultancy relating to all aspects of Bushfire

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28/07/23