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12/08/26

The Secretary
Save Mt Lofty Inc

Attention. Mr Chris Meibusch

Project; Proposed Development

2A Rifle Range Road
Mt Lofty

RECEIVED
13/08/2026
TOOWOOMBA
REGIONAL COUNCIL

Dear Sir

Further to my previous letter in relation to this project and the LEC report, I note that the LEC report, quite correctly notes that BAL Assessments have not been provided due to legislation. However in section 6.5 of the report, it does in fact provide a BAL assessment entitled "Bushfire attack scenario B" where the correct slope of 30 degrees downslope (the maximum that can be utilised for computer modelling) has been utilised.

This is in conflict with the Hazard assessment for the same area which cites 11 degrees.

I note also that in "Section 7 Conclusion" the statement "This BFMP was prepared by a suitably qualified and experienced person based on then criteria in Section 10.2 of the BRC guide...."

I note that at no stage has there been any CV provided outlining the qualifications and experience of the author.

The BRC guide, section 10 Expertise lists a number of relevant points, and are all directed at assessment of Hazard and are environment focussed, and is generally focused on the role of the local authority- see appendix A. There is no comment for example, about assessment of building provisions under AS 3959.

Assessment of hazard is determining if the vegetation presents a hazard and the level of hazard.

This is only one small part of a Bushfire Mitigation Report. The Mitigation report should at very least cover a broad range of issues, generally as set out in sections 3.2, 3.3 and 3.4 of the Bushfire Report provided as support documentation to our previous letter.

These aspects are not covered by the types of qualifications expounded in Bushfire Resilient Communities, but are addressed by several Post Graduate Courses available at several Universities in Australia and formally recognised by the Fire Protection Association of Australia in its BPAD scheme. This scheme provides 3 levels of accreditation based on competency standards, with the highest level being BPAD Level 3.

Signed



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



10. Expertise

10.1 Introduction

This section is applicable where a local government:

- proposes to undertake a review of statewide State Planning Policy Interactive Mapping System (SPP IMS) bushfire prone area mapping as part of planning
- proposes to undertake a risk assessment for bushfire in accordance with AS/NZ 31000-2018 Risk management - guidelines, or
- contains provisions in a planning scheme for the undertaking of a BHA, Vegetation Hazard Class Assessment or BMP and preparation of a Bushfire Hazard Report as part of a development application.

10.2 Suitably qualified and experienced

The preparation of these planning scheme provisions or applicant-initiated assessments and reports should be prepared (or peer-reviewed) by suitably qualified and experienced people. These people should have the following qualifications and experience as a starting point:

- degree (AQF level 8) qualifications in environmental science, environmental management (or equivalent discipline)
- demonstrated experience in botanical survey and spatial analysis methods, including use of geographic information systems (GIS) software
- demonstrated experience in the assessment of bushfire hazard and risks or technical qualifications in environmental science, environmental management (or an equivalent discipline)
- demonstrated relevant industry experience in the assessment of bushfire hazard and risks for a minimum five years.

Where a local government proposes to include advice about the process for preparation of applicant-initiated assessments in its planning scheme (as a planning scheme policy, for example), it is recommended that advice on the necessary expertise also be included.

ELDON BOTTCHE

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./AIIMS (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