Attachment C

Plan of Management

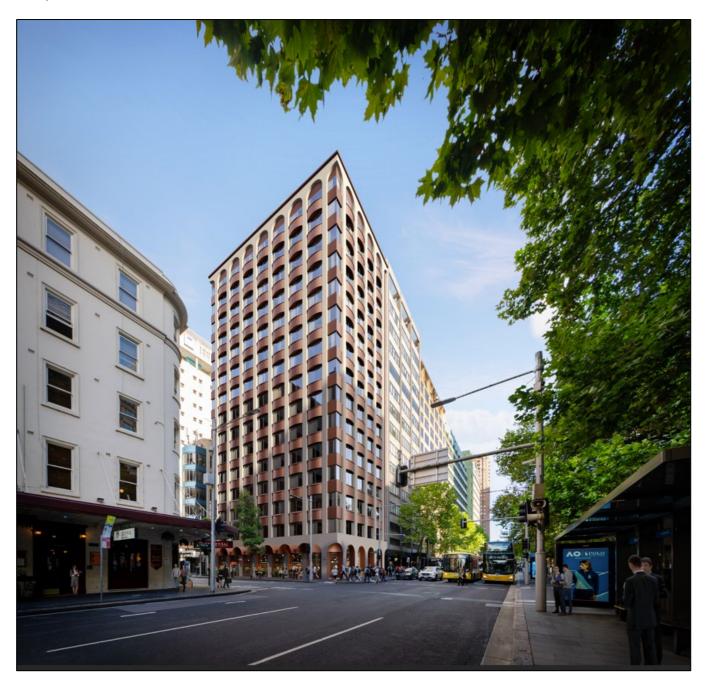


Hotel Plan of Management

39 York Street, Sydney NSW 2000

Submitted to City of Sydney Council on behalf of Invictus Pacific Alpha Management Pty Ltd.

5 July 2024



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1.0 Introduction

This Plan of Management (PoM) has been prepared in support of a proposed conversion of an existing vacant office building into a hotel at 39 York Street, Sydney. This plan outlines hotel management policies, addresses operational protocols for the proposed hotel and ancillary F&B outlets and establishes a framework for how ongoing operations to be managed by a third-party professional hotel operator that has yet to be appointed. The hotel operator will operate all aspects of the hotel including the management and running of the F&B outlets. It is proposed to be no third-party tenanted areas.

This plan of management has been prepared in accordance with the Plan of Management (Low Impact Hotel) checklist as contained within the City of Sydney DCP 2012 and has been prepared on the basis of the subject hotel being licensed to serve alcohol and to be a new licensed Category B (Low Impact) hotel that includes a hotel (general bar) liquor licence under the Liquor Act 2007 and acknowledge will be required to be reported to the Local Planning Panel based on their delegations.

The proposed hotel will consist of:

- Adapted reuse of an existing 15 story office building into a 152-room hotel.
- Repurposing of an existing 6 car bay basement into engineering services and back of house facilities.
- Activation of the ground floor with introduction of hotel foyer/lobby, F&B outlet and sidewalk seating.
- The footpath will have awnings to further accentuate the ground plan and provide weather protection.
- The rooftop plant area to be repurposed into a roof top bar with access to hotel guests and the general public.

This plan explains how the hotel will be operated to meet obligations associated with the hotel's management policies, the safety and security of the hotel's guests and to minimise impacts on the neighbourhood.

1.1 Hotel Operator

At this stage, a hotel operator has not been secured for the building. Notwithstanding this, the future third party major hotel operator will be required to adhere to the policies and procedures outlined in this plan. The plan is a dynamic document which continues to be refined based on changing best practices, regulation changes as the hotel operates into the future, and will be updated upon issue of an Occupation Certificate and Liquor Licence/s.



1.2 Objectives of the PoM

The objectives of the PoM are as follows:

- Provide an easy-to-follow document that outlines how the hotel will be managed and maintained in a manner that provides for a high standard of accommodation for all users.
- To ensure that management policies and procedures support the successful operation of the hotel as a responsible and responsive member of the community.
- Ensure that all servicing of the hotel is carried out in a coordinated, safe and managed manner, with minimal disruption to the surrounding area.
- Ensure vehicle access and traffic generation associated with the hotel has a minimal impact on the local road and parking network.
- Create an environment that is safe and non-threatening to staff, hotel guests and other members of the community.
- Ensure hotel guests are served in a responsible, friendly and professional manner by trained staff.
- Ensure all employees receive training in their responsibilities and have a sound understanding of management procedures adopted by the operator.
- Minimise the impacts of the operation of the hotel on guests and the community and to respond to all concerns promptly and professionally.

1.3 Implementation

The PoM is a responsive document which can be updated to respond to changing regulations, procedures and practices. All staff and management at the hotel will be provided with a copy of the PoM and briefed on the requirements as part of the employment induction process. A copy of the PoM will be available on site at all times.

The hotel adheres to the following rules of operation at all times:

- · Comply with all regulatory approvals;
- Comply with its House Policies (emergency and evacuation procedures, cash handling and the like); and
- Ensure compliance with this PoM.

1.4 Site and Locality Details

The site is located at 39 York Street, with three street frontages bounded by York Street, Erskine Street and York Lane as illustrated in **Figure 1 & 2.** The site is located approximately 150m south of Wynyard Railway Station and 50m west of the bus interchange on Carrington Street.



Figure 1: Site Location

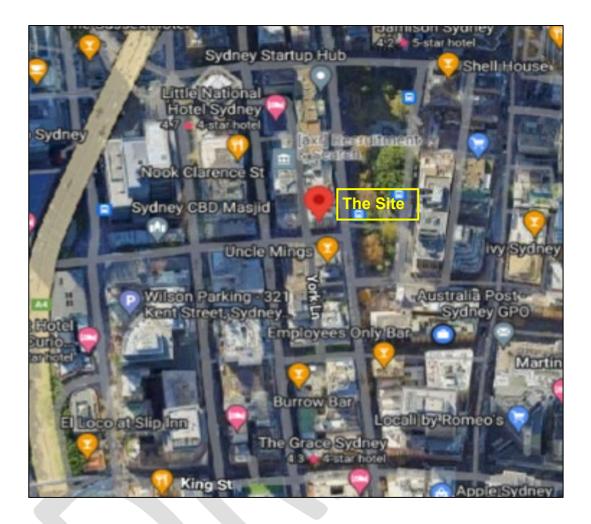
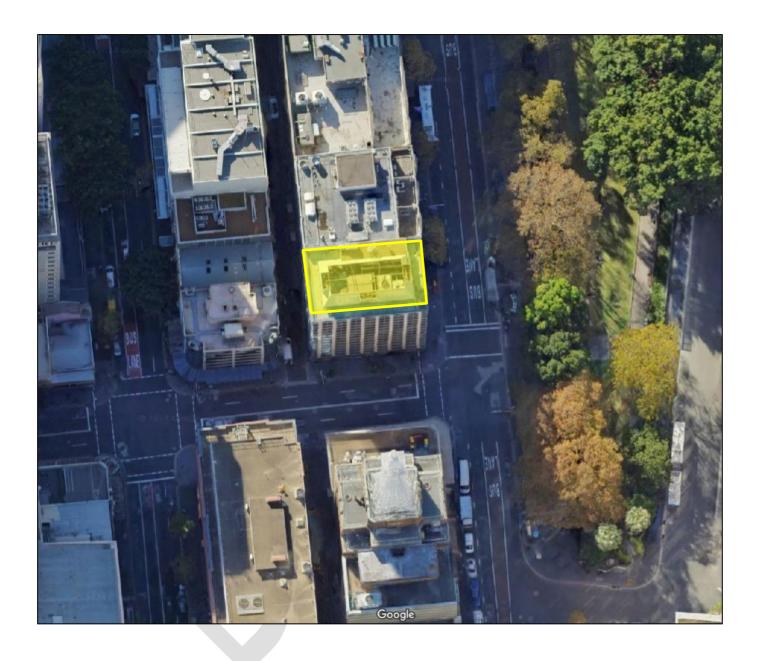




Figure 2: Site Aerial





2.0 Operational Management Plan

2.1 Overview

The operation of the hotel is to have regard to:

- Ensuring maximum occupancy requirements are not exceeded.
- Waste minimisation, storage and collection procedures.
- Staffing arrangements including the number of staff to be employed.
- Maintenance and cleanliness of the hotel.
- Ensuring the ongoing workability of emergency systems including lighting and smoke detectors, sprinkler systems, and air conditioning.
- Ensuring staff are trained in relation to the approved Emergency Management and Evacuation Plan.
- Ensuring the placement and composition of furnishing and fittings achieve the appropriate fire safety requirements.
- Ensuring hotel are regularly checked to ensure fire safety including that all required exits and egress paths are clear and free of locks and obstructions.
- · Safety and security of staff, tenants and guests.

The hotel ensures senior management is responsive to the following:

- · Requirements of the NSW Police Service.
- Requirements of officers of Sydney City Council, who may visit the hotel from time to time in the
 performance of their statutory duties. They are to be afforded courtesy and issues raised by them are to
 be addressed in a sensible and prompt manner.
- The hotel recognises the need to ensure the safety and security of staff, guests and the greater community in which the hotel resides.

2.2 Hours of Operation

The proposal includes the service and sale of liquor for consumption on site and will be seeking a hotel liquor licence.

The hotel is located in the Late-night management area of the Sydney CBD and based on number of patrons for each of the F&B premises will be classified Category B- low Impact and therefore the trading hours limits are set out in the City of Sydney Late Trading for Business guidelines as below:

		Category A Indoor	Outdoor	Category B Indoor	Outdoor	Category C Unlicensed premises indoor
Late-night management area	Base	6am to midnight	10am to 10pm	6am to 2am	7am to 10pm	24 hours
	Extended	24 hours	9am to 1am	24 hours	7am to 1am	24 hours

The ground floor food and beverage offering will service both guests and general public for breakfast and take way in the mornings and then be utilised as a restaurant for lunch and dinner.

The roof top bar area will be available to hotel guests in the mornings and can be utilised as co-working space. From lunch time the roof top is to trade as a bar (with food) open to hotel guests and general public.

Any outdoor dining will conform with the City of Sydney, Outdoor Dining Guidelines.



The specific hours of operation throughout the entire hotel are proposed (subject to liquor licence) as follows:

- Hotel Trading- 24 hours a day, 7 days a week.
- Ground Floor café/restaurant -open to public for all opening hours
 - Breakfast from 6am -11am (daily)
 - o Lunch 12.00pm -3.00pm (daily)
 - o Dinner 5.30pm 12.00 midnight
 - Outdoor seating 7.00am to 10.00pm (subject to further approval)
- Rooftop bar
 - o Breakfast- not open to public- hotel guests only from 6am -11am (daily)
 - o Bar Menu -12.00pm to 10.00pm (daily) open to public
 - o Bar service of alcohol -12.00pm to extended trading of 1.00am (daily) open to public

Figure 3: Ground Floor Plan

Hotel Foyer, Restaurant & Loading

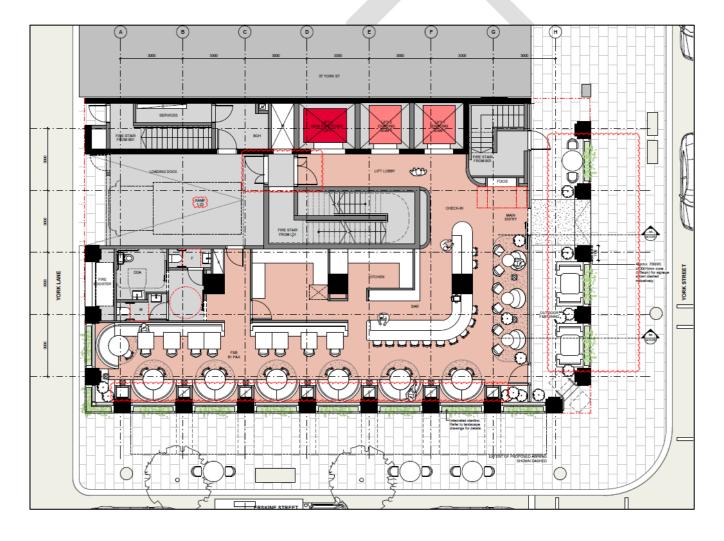
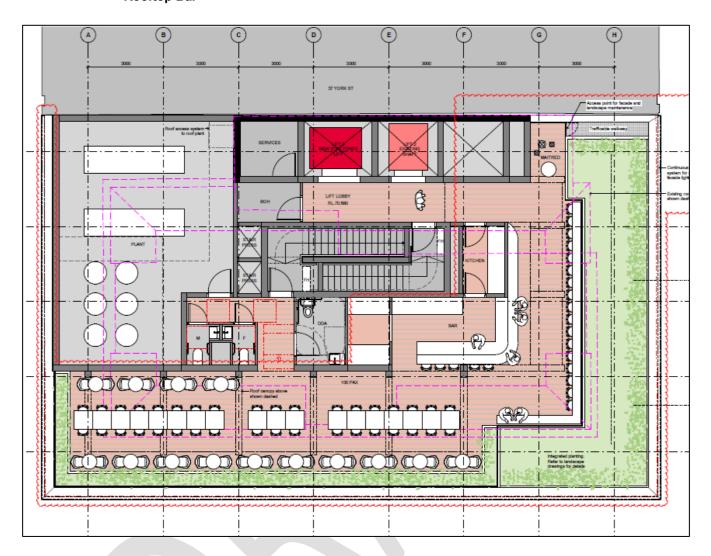




Figure 4: Floor Plan Rooftop Bar



2.3 Hotel and F&B

The hotel will consist of 152 rooms (including 8 DDA rooms) over 14 levels, with the ground floor to be utilised for hotel foyer/reception, food and beverage outlet and loading facilities. Each guest will have access to exclusive sanitary facilities.

There will be c320 peak guests staying at the hotel at any one time.

The ground floor restaurant will be 75 pax (internal) and available to hotel guests and general public.

The roof will be a 100 pax roof bar that is available to guests only before 12.00pm and the public at other times.

There is potential for outdoor dining, however any outdoor dining on Council land/footpaths will need to be the subject to a Footway Dining Application and does not form part of this Development Application.

2.4 Responsible Service of Alcohol

Management and staff will comply with the measures for the responsible service of liquor set out below, and further will take all reasonable steps to ensure there is no loitering of persons in the immediate vicinity of the proposed licensed hotel who have been refused admittance to, or have been ejected from, the hotel.

The following operational policies for the responsible service of liquor will apply whilst ever they are a requirement and any new policies that replace them will be implemented immediately.

(i) The hotel will implement a "House Policy" regarding the responsible service of liquor at the hotel, a copy of which will be provided to all staff on commencing employment at the hotel.

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- (ii) Management and all staff will take all reasonable steps to restrict activities, (such as promotions or discounting) that could encourage misuse or abuse of liquor (such as binge drinking or excessive consumption).
- (iii) The licensee will complete an approved responsible service of alcohol course and ensure that all relevant staff involved in the sale and supply of liquor also complete the same.
- (iv) Management will encourage patrons to drink responsibly and let them know they will be asked to leave if they become intoxicated, violent or guarrelsome.
- (v) Non-alcoholic beverages will be available at all times when full-strength liquor is available.
- (vi) Water will be available at all times liquor is consumed and will be offered free of charge.
- (vii) Food commensurate to the responsible consumption of liquor will be available whenever liquor is consumed at the licensed hotel.
- (viii) Any person suspected of being under the age of 18 years will be requested to provide acceptable identification before being sold or supplied liquor. The only acceptable proof of age identification will be:
 - Current driver's licence or rider's licence;
 - Current passport;
 - NSW Photo Card issued under the Photo Card Act 2005;
 - RTA Proof of Age Card;
 - Proof of Age Card issued by a Public Authority of the Commonwealth or another State or Territory;
 - Any other class of document prescribed by the Liquor Regulation from time to time.
 - Prevention of Sale and Supply of Liquor to Minors All staff will be under strict instructions to ensure that liquor is not sold and supplied to persons under the age of 18 years.

2.5 Patron arrival/departure

The lobby will be clearly themed and identified and will be monitored by hotel staff at all times to allow for appropriate management of guest check-in/outs and building-related enquiries. This is an appropriate location as it feeds off the York Street drop-off points for public and private transport.

The taxi stand in front of the adjoining building on York Street (37) will be utilised by patrons when available.



2.6 Checking In/Out

All guest bookings and check in/out services will be carried out in the reception area and will be tracked by a property management software system used to monitor and regulate hotel bookings, also available to guests may check in via a dedicated hotel app that will allow guest to download their key onto their phone and be able to bypass any physically check in.



2.7 Access

Access to the hotel rooms will only be available via secured electronic key cards. Each card will only allow access to their corresponding level and communal facilities (e.g. Level 3 cards will not be able to access Level 4). Guests who wish to access the rooftop bar during trading hours will only be able to exit at roof level/ground level.

2.8 Maximum Stay – Hotel Rooms

The maximum permitted length of stay for the hotel rooms is three (3) months.

2.9 Security

The hotel entries, lobby and common areas will be monitored 24 hours a day via CCTV monitoring, as well as by trained hotel staff during operating hours. The hotel, as such, will not generate the need for full-time security staff for the hotel accommodation, however if required security will be provided and especially if required for the operation of the rooftop bar.

All staff will be trained in relevant security measures. Staff initiation and ongoing training days will be held on a regular basis to reinforce safety and security procedures for each of the businesses. Training will ensure that in the event of a robbery, theft or anti-social behaviour, staff acts in a manner to best protect themselves and the guests. Employees will be encouraged to report any suspicious activity or persons in and around the area to the Management and / or Local Police.

Individual, secure, lockable storage facilities will be provided within each hotel room to allow guests to individually store key travel items within the room. An additional secure baggage store area will be provided near the hotel reception. The entire development will be secured by electrical key cards restricting and controlling access for hotel guests, staff and contractors.

2.10 Staffing Levels

The proposal contains 152 rooms, and the hotel will employ approximately 60 staff with peak of approximately 30 staff on site at any one time. These roles will typically consist of management, food and beverage and housekeeping staff.

Hotel management will monitor staff rostering schedules to ensure an appropriate ratio between the total number of staff and guests is managed, particularly during peak arrival and departure times.



Figure 5: Typical Floor Plan

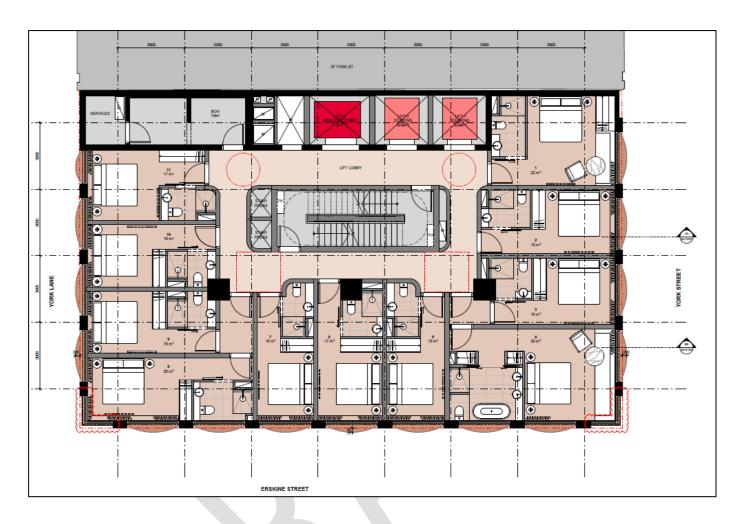
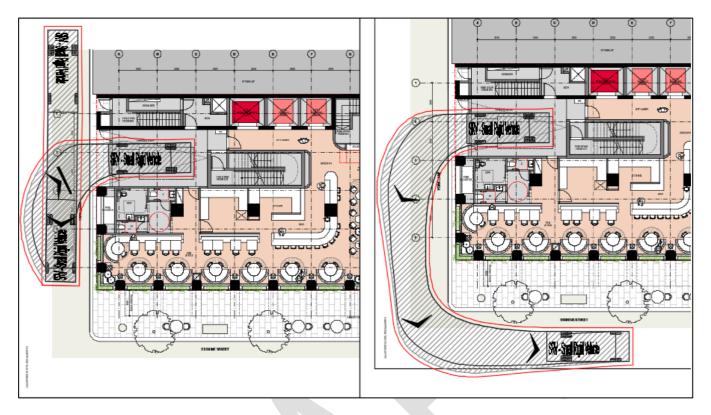




Figure 6: Ground Floor Plan showing loading



2.11 Public Transport

The site's central location and range of public transport options encourages travel by public transport and foot. The hotel will contain maps that show the close proximity of key destinations and the area's transport hubs for visitors who may wish to visit using public transport.

2.12 Deliveries and Servicing

Deliveries and servicing to the hotel will occur in accordance with the following key principles:

- Deliveries of goods and services, and collection of waste and other materials is to occur via the loading dock only that is exclusively accessed from York Lane.
- The majority of goods delivered, as well as waste collection will occur during off-peak periods, where possible. This will limit any disturbance to guests in the hotel or the amenity of the surrounding area.
- Deliveries and collection of linen/laundry is to occur between the hours of 7am and 10pm, 7 days per week.
- Delivery vehicles that service the site are to be no larger than a small rigid vehicle (i.e. 6.345m length).
- The hotel management is responsible for coordinating delivery and servicing times to ensure that
 overlapping of delivery vehicles does not occur. This could include allocation of delivery windows for
 specific service providers and suppliers.
- Vehicles accessing the loading dock enter from Clarence Street along the one-way York Lane and will
 reverse into the dock from York Lane and drive out in a forward direction out to Erskine Street. A "spotter"
 to manage potential conflicts with users of York Lane will be used.
- Access for deliveries and waste collection will not cause any interruption to the flow of external traffic. It will be
 desirable for all loading and unloading to be undertaken wholly within the hotel with no deliveries, loading or
 unloading occurring on the street.

Figure 6 above illustrates the proposed loading dock configuration.

This operation has been endorsed by JMT in their Transport Assessment report.



2.13 Building Design and Safety Procedures

The building has been designed to ensure the enjoyment and safety of guests.

The lifts will adequately allow guests to travel between the lobby, reception, hotel floors and rooftop bar. Fire stairs have been incorporated into the design as an alternative means of egress during an emergency. Common areas and the hotel rooms will be sprinkler protected and a Building Occupant Warning System (BOWS) will be installed into the building for fire evacuations. All building emergency systems will be periodically tested including lighting and smoke detectors, sprinkler systems, and air conditioning as part of normal operational procedures.

An Emergency Management and Evacuation Plan will form part of the operation of the hotel and all staff and security will be appropriately trained in relation to administering and implementing the Plan.

A range of measures have been implemented into the building to minimise the impact of noise from adjoining neighbours within the building.

The hotel floors will be acoustically treated for both airborne noise and footfall noise to comply with the BCA. Walls between hotel rooms will be designed to comply with the BCA.

2.14 Crime Prevention Through Environmental Design

The PoM is consistent with the principles of Crime Prevention Through Environmental Design (CPTED) by creating environmental and social conditions that:

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension).
- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime).
- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards).
- Minimise excuse-making opportunities (removing conditions that encourage/ facilitate rationalisation of inappropriate behaviour).

The safety and security issues addressed in this PoM are consistent with current policies that ensure the quiet amenity of neighbouring properties is maintained at all times during the operation of the hotel. All staff, as part of the induction process, are required to be familiar with this PoM.

2.15 Noise

The new hotel will be managed to minimise the potential of causing a nuisance, or an offensive noise as defined in the *Protection of the Environment Operations Act 1997* to adjoining properties or the public. The following measures will be implemented:

- The hotel will ensure senior management is aware of the operational consequences of the PoM to ensure that it is consistently enforced.
- All staff, as part of the induction process, will be required to be familiar with this Management Plan and will play an important part in maintaining a quiet ambience.
- Guests of the hotel making any significant noise at sensitive times will be asked to reduce their volume and any guests behaving in an unsociable manner will be asked to moderate their behaviour.
- Additionally, the safety and security issues addressed in this Management Plan have been devised to
 ensure the quiet amenity of neighbouring properties is maintained at all times during the operation of the
 hotel.

Staff will be encouraged to minimise noise whilst on site and always report any negative behaviour. Reports of all noise complaints will be documented in a register and kept on site. Staff will be encouraged to ensure that customers behave in an appropriate manner whilst on the site and do not disturb the neighbourhood when leaving the hotel late at night.

The hotel will be operated in accordance with noise conditions imposed by local authority as part of any development approval as well as any requirements of the relevant licensing authority. All sound emissions and noise management practices will comply with Council's requirements, the Protection of the Environment 161



(Operations) Act 1997 and NSW Office of Liquor, Gaming and Racing (OLGR). The acoustic report submitted has demonstrated that the roof bar will have no adverse amenity impacts to surrounding land uses or future visitors to the hotel.

Key initiatives to minimise noise during normal hours and after hours include:

- Management and staff intervention.
- Noise limiting applications on sound systems and equipment.
- Passive Design noise barriers including screens and curtains.

This operation has been endorsed by PWNA in their Acoustic Impact Assessment report.

2.16 Waste Management

All guests are to minimise waste and recycle as appropriate. Garbage should only be placed in the waste storage facilities provided. Litter will not be tolerated in hallways.

The hotel manager will arrange for the accumulated waste and recycling to be moved to the holding area on street level for collection on garbage day. After collection the onsite manager will arrange for the empty receptacles to be moved to the bin room in the basement.

Hotel staff will bring bins to the loading dock on designated collection days loading into waste collection vehicles will occur in the Hotel's loading dock in York Lane, outside normal business hours, to minimise inconvenience to other laneway users and businesses in the immediate area. The Hotel's staff will assist in this process by ensuring vehicle and pedestrian safety while the loading process takes place.

Further details on waste management- refer to Waste Audit's Waste Management report.

2.17 Cleaning

Hotel staff will ensure as far as practical that the hotel is kept in a clean and tidy condition both internally and externally to the extent of the building that is managed and controlled by the hotel. Cleaning of both internal and external areas of the hotel will be undertaken by cleaning staff.

2.18 Graffiti

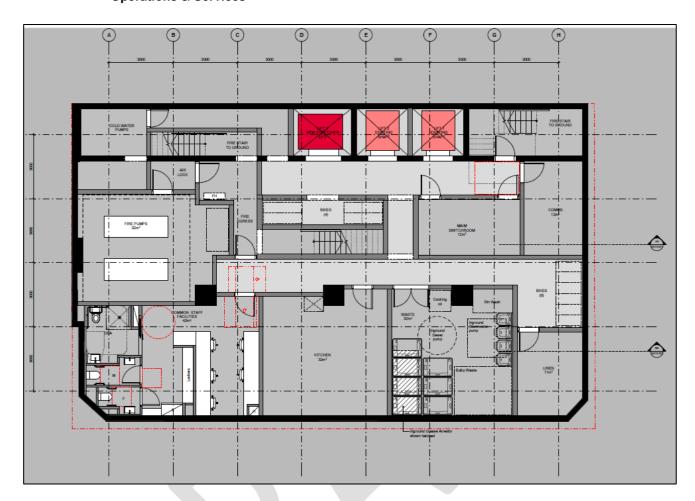
The hotel will comply with common policy in relation to all Graffiti. Any damage to property by way of Graffiti will be removed from the site within 24 hours of being noticed.

2.19 Money Handling

The hotel will be cashless, however if required, an independent security company will be employed to undertake all movement of cash to and from the hotel. There will be no cash movements from the hotel by the staff at any stage. There will be no movement of monies from the hotel by Security Personnel at night. All appropriate safety alarms will be installed at the building including back-to-base security which involves the Intruder Alarm System being linked to the security company.



Figure 7: Basement Floor Plan Operations & Services





3.0 Security Management Plan

3.1 CCTV Camera

The security and safety of employees and the general public are to be of top priority to the management of the

The hotel will have CCTV surveillance cameras in the hotel in strategic places including the building entry points, hotel lobby, loading dock and common areas. This system has automated recording technology, longer video storage capacity and video motion detection.

All cameras will operate 24 hours a day. The surveillance tapes / videos are to be kept off site for at least 1 month for viewing by the Police if required. The quality of the images filmed are to satisfy Police requirements.

Management will ensure the system is maintained and in good working order. Management is to ensure that the coverage is operated with due regard to the privacy and civil liberties of all persons within the development and in strict accordance with the Privacy and Personal/Information Protection Act 1998.

3.2 General Surveillance

The hotel's employees are encouraged to assist with passive surveillance of all areas of the development and in particular the reception area by providing efficient reporting systems for any security or safety concerns.

Clear lines of sight and lighting will be provided within the lobby and at street level to activate the ground plane, encourage passive surveillance and deter antisocial or criminal behaviour.

The hotel is to undertake a risk assessment analysis on a continual basis to determine the need for security personnel in the hotel.

3.3 Lighting

External lighting will be provided around the building and building entries to enable clear vision and will be designed in such a manner so as to prevent concealment and shadowing. The standard of lighting will not only reduce the fear of crime in accordance with Australian lighting standards, but also serves to provide clear identification of activity using the high technology CCTV cameras proposed.

Broken light fixtures and bulbs within the hotel will be replaced within 48 hours.

Lighting on the roof bar will be designed to limit "light spillage" to neighbouring properties.

3.4 Restricted Areas

Access will be restricted particularly in relation to nominated 'secure areas' such as back of house areas. This will be achieved by the installation of security hardware (locks, etc.).

3.5 Signage

Clearly identifiable statutory and way finding signage will be installed in and around the building to indicate which areas are open to guests and members of the public and which areas are restricted. The hotel will be signed on the façades (subject to authority approval) to identify the hotel brand.

3.6 Space Management

Routine maintenance checks and reporting will be carried out by personnel employed at the hotel to ensure the property is maintained and to reduce the likelihood of crime or vandalism. Landscaping will be maintained in a manner that communicates an alert and active presence. Furthermore, robust materials are proposed to be used where possible to mitigate potential malicious damage. Any vandalism or graffiti should be repaired and removed promptly by staff or contractors.



3.7 Landscaping

The site landscaping is designed to help integrate the built form into the site and surrounds. The proposed landscaping scheme avoids vegetation that impedes the effectiveness of outdoor lighting. It will be maintained regularly by an external landscape maintenance contractor to communicate an alert and active presence and maintain a high-quality appearance.

Landscape Maintenance Plan

The maintenance contractor must maintain all plant material in a state of health and vigour. To do so, the Contractor must engage the services of a Horticulturist with a minimum 3 years' experience to undertake inspections and supervise (all) rectification and maintenance works. The contractor must also maintain the site in a neat and tidy appearance through general sweeping and rubbish removal.

Activity	Required Action	Frequency
Logbook	The contractor is required to maintain records of maintenance visits and tasks undertaken. The project maintenance records must be kept by the Client's Representative. At the end of each maintenance visit the contractor must report to	At each maintenance visit.
	the Client's Representative and arrange an inspection to have maintenance works independently verified. Once approved the contractor must fill out the log book	
	retained by the Client's Representative.	
Watering	The contractor must undertake irrigation maintenance to support healthy and vigorous plant growth. Inspections must be undertaken by a qualified Horticulturist with 3 years' experience. At each visit the Contractor's Horticulturist must assess soil moisture against the requirements of the planted vegetation. Dry / wet conditions may be detrimental to growth dependent on the species planted. Experience is required to make an informed assessment. Where an irrigation system is installed the contractor must monitor the application rates and make running adjustments to ensure appropriate soil moisture levels. Particular attention must be paid to maintenance within the first 4 weeks when plants are most susceptible to death through transplanting shock, altered environmental conditions and varying soil interface issues.	Weekly for 8 weeks, then fortnightly for the remainder of the contract.
Weeding and rubbish removal	Whole Site: The contractor must remove any plant material that has not been specified and general litter from garden beds, and, sweep paths and pavements of fallen / windblown vegetative matter and rubbish. Dispose of all material offsite.	Monthly
Fertilising	Lawn: Provide one application 8 weeks after the initial lay with a proprietary fertiliser, with an N:P:K analysis of 10%(N): 3.4%(P): 6.4%(K). Broadcast evenly and water in well in accordance with the manufacturer's recommendations and application rates. Gardens: Nil	Lawn only - 1 application 8 weeks after planting
Pesticide / Fungicide Spraying	Nil. Make recommendations should spraying be required.	NA
Herbicide spraying	Nil. The contractor must undertake weed removal by hand or mechanically.	NA
Soil subsidence	Contractor must maintain garden soil surface levels throughout the maintenance period correcting soil subsidence. Soils and mulch are to remain flush with raised planter edges.	As required.
Mulch	Generally, top up mulch annually in spring to maintain the specified depths. Ensure no topsoil is exposed. Top up with the mulch originally specified. Sweep dispersed mulch back onto garden beds.	Annually
Stakes and ties	Stakes and ties must not be used to support weak stemmed plants. If required, stakes and ties must be a loose fit allowing trunk and stem movement and the development of reaction wood. Stakes must not be driven into the plant rootball. All stakes and ties must be removed after one year of installation.	Practical completion audit. Removal at 12 months.
Plant replacement	The Contractor must replace dead or dying plants. Should any one species fail entirely, the Contractor must not replace with the same species. In such cases the Client's Representative must be sought to provide species variation advice. Species must be assessed and replaced within two weeks of assessment. Assessment must be undertaken every 12 weeks.	12 Weeks
Pruning	The Contractor must engage the services of a Horticulturist for all pruning works of trees and shrubs. Generally, shrubs are to be tip pruned at the end of each flowering period. Shrubs and plantings must be appropriately maintained to allow for clear lines of sight over	6 Months



the shrubs from pathways and pedestrian areas, and to avoid any plantings being	
used as a natural ladder to gain access to any higher parts of the building.	
Mature shrubs along pathways around the entrance are to be no more than 1 metre	
in height	
Trees are to be progressively crown lifted when branches are no greater than 20mm	
in diameter. All trees are to be appropriately pruned, trimmed and maintained for	
passive surveillance and to prevent climbing of trees to gain access to balconies.	

3.8 Weapons

Weapons of any type, i.e. knives, firearms, etc., will not be permitted at any time, unless in the hands of authorised security personnel or Police.

3.9 Theft

In the event that theft occurs involving a guest, every effort must be made to assist the guest in any way possible, i.e. forms, police report, telephone calls. All personal information must be recorded on the Incident Report Form in case any items are recovered at a future time.

Incidents involving staff members must also be documented on the Incident Report Form and any necessary police reports must be completed. A list of all items missing must be recorded.

The theft of any property on the hotel must be reported to the police for insurance purposes. All thefts must be documented clearly and concisely on an Incident Report Form.

3.10 Antisocial Behaviour

The hotel will adopt a zero-tolerance approach to antisocial behaviour at the hotel.

3.11 Complaints Handling

All staff members will undergo complaints training to ensure that they are skilled in being able to appropriately manage complaints or when they are required to be elevated to a Manager. Generally, all complaints will be dealt with by Managers.

Staff will be trained to handle complaints by teaching them the LAST process – Listen, Apologise, Solve and Thank. Staff are trained to know how and when to turn over complaints to Managers.

As a basic course of procedure, if a hotel guest or member of the public becomes irate and threatens someone, the following actions should be followed:

- 1. A Manager will be requested to address the guests concerns and take appropriate action to resolve the situation.
- 2. If the guest continues to behave in an unsatisfactory or threatening way the person will be asked to leave the hotel.
- 3. If the person refuses, as a last resort, consider calling the police.
- 4. This incident or complaint would be required to be noted in the complaints register.

Complaints will be handled by management and staff at the hotel. Guests will also have the opportunity to escalate issues to head office.

3.12 Incident Reporting and Complaints Register

A register is to be kept which identifies any incidents that may have occurred or complaints that are considered to be worth noting. The day, time and details of the incident/complaint are to be noted within the register. A copy of the register will be made available to the Police within 48 hours of request, if requested.

Staff must not resist a robbery and are required to call the police after the person(s) has left the building, at which time doors are locked. The hotel must stop trading until emergency services arrive.

The entries within the incident/complaints register will be used as a basis for the review and amendment to this plan of management as required. A review of the incident/complaints register will be undertaken annually.



3.13 State Health & Safety Regulatory Authority

Any Notice / document / request that is raised by a State Health & Safety Regulatory Authority Inspector must be immediately communicated to the OHS Manager who will then ensure that all other appropriate personnel are informed. The OHS Manager will then develop an Action Plan / Actions with responsibilities to address the issue raised.

3.14 Consultation

Invictus are committed to ongoing consultation with adjoining property owners, Police and Council to foster a better understanding of relevant operational issues that may arise at the site and would be available to be contacted to discuss potential issues as they may arise.

Ongoing review of this document may be undertaken to ensure that the PoM remains relevant to the operation of the hotel and that issues that arise can be managed into the future. A final PoM will be prepared by the future selected hotel operator to be completed prior to the issue of an Occupation Certificate.

