

## Kosciuszko Thredbo's Response to SUB-3003

### Development Application: DA 22/11272 (PAN-252713)

#### Proposal: Construction of rail-guided toboggan and associated works

Environmental Value / Aspect	Submission Comment	SEE Reference	Kosciuszko Thredbo Response
<b>Consistency with NPW Act and KNP PoM</b>	<p>The development is not consistent with the National Parks Act or the Kosciuszko Plan of Management.</p> <p>Amusement rides do not belong in National Parks and do not allow for the conservation of the natural parks natural and cultural values.</p> <p>If so, which natural or cultural values are being conserved by the development?</p>	<p>Flora and Fauna Assessment</p> <ul style="list-style-type: none"> <li>“ Whilst the study area provides a small amount of potential habitat for threatened fauna species such as the Broad-toothed Rat, Eastern Pygmy-possum, Gang-gang Cockatoo, Olive Whistler, Pink Robin and Flame Robin, similar habitats are extensive in the locality and the habitats to be affected are small in the context of the extent of similar habitats contiguous with the study area. Furthermore, <b>the proposal will not affect any potentially important habitats for threatened fauna species. The proposal will not sever any linkages between habitats or otherwise permanently restrict fauna movement</b>”</li> <li>Section 5 of the Flora and Fauna Assessment report outlines recommendations for impact mitigation and amelioration.</li> </ul> <p>SEE</p> <ul style="list-style-type: none"> <li>Section 7.10 – Aboriginal Cultural Heritage</li> <li>Section 4.5 of SEE – assessment against Ecologically Sustainable Development Principles</li> <li>Section 7.4 social and economic benefits</li> </ul>	<p><b>Consistency with the objectives of the National Parks and Wildlife Act 1974:</b></p> <ul style="list-style-type: none"> <li>The conservation of habitat, ecosystems, biological diversity, landforms and landscapes of significance, objects, places and features of Aboriginal significance or social value to the people of NSW are not adversely affected by the Development.</li> <li>NPWS have provided Lessor's Consent for the Development (02.02.2022).</li> <li>The Development has applied the principles of ecological sustainable development to first avoid impacts, then minimise impacts on the natural environment. This is demonstrated in the SEE and Flora and Fauna Assessment. It is acknowledged the proposal will result in environmental impacts, including loss of native vegetation. However, the recommendations in Section 5 of the Flora and Fauna Assessment will be implemented to ensure the natural values of the site are conserved and protected as much as practicable. The environmental impacts are considered acceptable. The Development does not pose a threat of serious or irreversible environmental damage.</li> <li>The SEE found no Aboriginal objects, places or features are identified within the site, therefore impacts to Aboriginal heritage values are unlikely from the proposal.</li> <li>The Development will allow guests to appreciate and enjoy the natural landscape in which the coaster is situated.</li> <li>The Development has applied the principles of ecologically sustainable development as demonstrated in the SEE.</li> <li>The SEE has demonstrated the integration of the proposal with existing infrastructure within the locality. The scale of the proposed coaster infrastructure is not dissimilar to existing lifts and buildings within the locality.</li> <li>The Development will result in social and economic benefits as demonstrated in Section 7.4 of the SEE.</li> </ul> <p><b>Consistency with the KNP PoM:</b></p> <p>The values of KNP also include economic, social and recreational values. Thredbo forms part of the Thredbo Management Unit which is listed as an area of exceptional recreational significance. Thredbo is known for its wide range of winter and non-winter facilities that actively encourage visitor use of the area on a year-round basis.</p> <p>The Management objective for the Thredbo Management Unit is as follows:  <i>“The Thredbo Management Unit is managed so as to provide opportunities for visitors to enjoy, understand and appreciate the values of the park in ways that minimise adverse impacts”</i></p> <p>The Development has undergone extensive planning to ensure impacts to the natural environment are first mitigated, then minimised as much as practicable. The Development will provide another opportunity for visitors to enjoy and appreciate the recreational values provided by Thredbo.</p>

<b>Biodiversity / vegetation clearing</b>	II. The development has not demonstrated that it has avoided environmental impacts, with 1/3 of a hectare of woodland vegetation to be removed, including development in a biodiversity area. Avoidance would mean that it would be located solely within disturbed areas, such as the ski slopes or urban areas of the resort.	<p>The Flora and Fauna Assessment states the following:</p> <p>The alignment has been chosen to <u>avoid locations</u> that are particularly sensitive i.e. Subalpine Riparian Scrubs and Subalpine Bog. For this reason, the alignment has been modified in places to avoid land mapped on the Biodiversity Values Map, as defined in the NSW Biodiversity Conservation Regulation 2017 (BC Reg)...</p> <p>Where the alignment of the Alpine Coaster encroaches slightly into the mapped area (Circle 3), the centreline of the Coaster will be setback 3 m from the remnant Subalpine Woodland, <u>avoiding</u> the need for any tree removal. Furthermore, at Circle 3 the track will be elevated, as shown in Figure 3, <u>avoiding</u> the need for any vegetation removal apart from the track footings, which are on the inside of the track, which has already been cleared of native vegetation as shown in Photo 5.</p>	<p>A key objective of the Biodiversity Conservation Act 2016 (BC Act) is to establish a framework to avoid, minimise and offset the impacts of development and land use change on biodiversity.</p> <p>As discussed in the Flora and Fauna Assessment, the Development has first avoided encroachment on land comprising existing biodiversity values. The alignment has undergone several iterations to avoid areas of native vegetation as much as practicable. The amount of new disturbance has been minimised through extensive planning and consultation with technical consultants.</p>
<b>Validity of impact assessment</b>	III. the SEE has been prepared by the Development and Owner. This can therefore not be considered a proper independent assessment of the impacts of the development. Any claims or conclusions in the statement cannot be accepted in good faith. Would BHP be allowed to prepare its own environmental impact assessment for its own mine? I would not think so!		<p>The legislative framework does not exclude KT from preparing a Statement of Environmental Effects for a Development Application. Appropriate steps have been undertaken to inform the impact assessment of the proposal, including engagement with key internal and external stakeholders such as DPE, NPWS and DPE-Water. Technical consultants (including ecologist, geotechnical engineer, civil engineers, architects and building certifiers) were engaged to prepare independent studies on environmental impacts to inform the impact assessment on existing values of the site. Recommendations for avoidance, mitigation and impact amelioration from the technical consultants have been incorporated into the design and construction of the Development.</p>

## Kosciusko Thredbo's Response to Submission (SUB-2848 & SUB-2850) from Kasees Apartments and Mountain Lodge.

### Development Application: DA 22/11272 (PAN-252713)

#### Proposal: Construction of rail-guided toboggan and associated works

Environmental Value / Aspect	Submission Comment	SEE Reference	Kosciusko Thredbo Response
<b>Visual amenity</b>	<p>Coaster is visually unacceptable, adds to already impacted view of the mountain.</p> <p>Loss of amenity.</p>	<p>Section 7.5 – Visual impact assessment.</p> <p>The coaster alignment has been designed to maximise the use of existing vegetation screening and topography to minimise visual impacts as much as practicable.</p> <p>The Development will be visible from some ski slopes, mountain bike trails, walking trails, parts of the village and tourist accommodation. The Development is not visible from the Main Range.</p> <p>The Development is located on the lower section of the mountain, as such it is not highly visible from the Alpine Way. The views from Alpine Way are generally fragmented by existing infrastructure and vegetation screening.</p> <p>The visual impacts of the Development are not considered significant given the resort currently comprises similar infrastructure within the locality, such as the bobsled, snowmaking infrastructure, Valley Terminal buildings, Catshed, Catshed Communications tower, Merritts Gondola base station and Snowgums Chairlift base station.</p> <p>The design has mitigated the potential visual impacts as much as practicable through aligning to the topography, utilisation of exiting disturbed areas and tracts of vegetation which screen parts of the track. The design of the base station area (including carpark redesign, improved thoroughfare and landscaping) will contribute to improved amenity of the local area.</p> <p>Section 3.2.9 – Landscaping and rehabilitation ... Landscaping around the bottom station will be undertaken in the areas marked on the Bottom Station Plan, Drawing No. A1.220. Landscaping within this area will be consistent with surrounding landscaped areas in the Valley Terminal base station area. The landscaped areas will enhance the visual amenity and aid in the management of run-off. All disturbed land within the construction corridor (e.g. service trenches, access routes) will be rehabilitated in accordance with the Rehabilitation Guidelines...</p>	<p>Further assessment of the visual impacts has been undertaken. The Coaster alignment has been superimposed on various viewpoints from the Village and Alpine Way to help conceptualise the visual impacts of the infrastructure. Additional photos depicting the Coaster infrastructure have also been provided to illustrate the proposed materials, form and colours of infrastructure that will be introduced to the site.</p> <p>The assessment provided in Section 7.5 of the SEE largely remains relevant. Some of the viewpoints provide clear sightlines to the Development site. The 4m clearing corridor and infrastructure that will be introduced as a result of the Development will not be dissimilar to the current cleared corridors visible across the ski resort. Whilst there may be a perceived loss of amenity for some stakeholders, the proposal has demonstrated sufficient design controls to minimise visual impacts as much as practicable. The visual impacts are considered acceptable in the context of the site and surrounding resort infrastructure.</p>
<b>Noise</b>	<p>The additional noise from the operation of the Coaster (including screaming riders) seems to have been ignored in the development application. Its operation will undoubtedly add to the noise generated by mountain biking and associated music which plays all summer season.</p>	<p>Section 7.8.2 – operation.</p> <p>The Development will result in increased human activity within the locality during operation. However, the coaster is not dissimilar to the existing bobsled operation within close proximity of the Development site. The site and immediate surrounds are already subject to noise associated with lifting operations, skiing/snowboarding, mountain biking, hiking and general resort operations. The coaster manufacturer (Wiegand) highlights that the toboggans drive downhill noiseless (Wiegand 2022). As such, the proposed noise impacts associated with the Development are considered acceptable given the siting of the Development and the existing recreational activities currently permitted within the locality.</p>	<p>The additional noise from operation of the Coaster was addressed in the SEE. The impacts were considered acceptable given the locality within the village hub and the existing recreational activities within proximity. The operational noise of the Coaster is not dissimilar to the noises associated with the existing bobsled operation in summer and other year-round lifting operations in the resort.</p>
<b>Noise / Flora and Fauna Impacts</b>	<p>Impacts on bird life and other native fauna of noise and vibration from operation of Coaster.</p>	<p>Flora and Fauna Assessment.</p> <p>The <b>noise</b> and vibration associated with the proposal is likely to temporarily deter any Broad-toothed Rat individuals that may be near the affected areas. As such, it is unlikely that any individuals would be unintentionally killed during the implementation of the proposed action.</p> <p>Whilst the proposal will result in increased noise and human activity whilst in operation, these increases will occur in areas that are already subject these impacts in association with chairlifts, skiing, mountain biking and resort operations. The proposal is not expected to have any substantial adverse impacts on habitat connectivity as the disruptions to existing connectivity will be minor, and only up to 4 m in width.</p>	<p>No further analysis is required.</p>

Alternative locations	A more suitable place for such a ride would be Friday Flat (away from the main village) or outside the Park altogether.	<p>Section 2.3 – site suitability.</p> <p>The site provides the appropriate slope for the gravity-based ride which was informed by the early site analysis undertaken by Wiegand (Alpine Coaster manufacturer) in 2017;</p> <p>The base station area is previously disturbed and located within close proximity of the existing Valley Terminal resort base station facilities which offer guest services (i.e. Ticketing office), retail shops, bathrooms and hospitality venues;</p> <p>The base station is located within close proximity of the existing Merritts Gondola which provides uphill access for other recreational activities offered in the resort; and</p> <p>The majority of the infrastructure is located within highly disturbed ski runs and its location has been strategically designed to ensure that it does not conflict with other winter or summer operations and recreational activities, such as skiing, snowboarding, grooming operations, walking or mountain biking.</p> <p>Section 3.3.2 – project alternatives.</p> <p>A range of alternatives to the final alignment and building locations have been explored since conceptual planning commenced in 2013, considering the constraints of the terrain and existing environmental values, safety risks and accessibility requirements.</p> <p>There is limited disturbed land within the resort that lends itself to the optimal slope requirements for the Development, as well as being easily accessible from the village hub. The proposed location was determined following detailed option analysis based on safety, accessibility, and avoiding and minimising environmental impacts as much as practicable.</p>	Alternative site locations were considered during the planning phase. Friday Flat is not a suitable alternative location to accommodate the Development. As per Section 2.3 of the SEE, the site is considered suitable to accommodate the Development for various reasons.
Land use suitability	We believe a development of this size is best located outside the Park. The Snowy Mountains Special Activation Precinct Master Plan would appear to support that?	<p>Section 4.4.1.1 – Alpine Sub-Precinct and Thredbo Village West Structure Plan.</p> <p>Thredbo is nominated as one (1) of the nine (9) Alpine sub-precincts included in the Snowy Mountains Special Activation Precinct (SAP).</p> <p>The Development is consistent with the features of the Thredbo Village West Structure Plan being part of a re-development of the Valley Terminal and enhancement of public realm. The Development will assist in achieving the “desired future character” to support year- round uses.</p> <p>The Snowy Mountains SAP Master Plan stipulates where development is proposed on land outside of development areas, additional technical investigation may be required. The Development site is predominately outside the Structure Plan development areas and is largely within existing disturbed areas. Where native vegetation clearing or modification is proposed, these areas have been assessed by Eco Logical Australia Pty Ltd (ELA) to ensure potential impacts to biodiversity are first avoided, then minimised and mitigated through a range of measures implemented during construction and operation. As demonstrated in Section 8.3, some minor impacts to native vegetation are unavoidable.</p> <p>The structure plan also identifies improvements to pedestrian access are prioritised, through the implementation of active frontages and new plazas to make Thredbo a more connected environment. The design incorporates the redevelopment of existing footpaths and the staff carpark / hardstand area linking guests between the Valley Terminal base station area and the eastern side of the village (footpath into Woodridge precinct).</p> <p>4.4.1.2 – Environment and Sustainability.</p> <p>The protection of the natural, cultural and social values of KNP is a primary focus of the Snowy Mountains Special Activation Precinct. As demonstrated in this SEE and supporting technical reports, the Development will not result in any significant adverse impacts on natural values. The Development has been designed to first avoid impacts on biodiversity, then minimise and mitigate impacts through a range of mitigation measures implemented during construction and operation (refer Sections 8.3 and 9).</p> <p>The Development will not adversely impact on any cultural values (refer Sections 8.9, 8.10 and 8.11.1).</p> <p>The Development will contribute to the social values of KNP through the diversification of recreational activities offered within the resort and contribution to year-round tourism within the Snowy Mountains region. The Snowy SAP Master Plan describes the future desired character of Thredbo as –</p> <p><i>“Thredbo is the densest alpine village among the alpine resorts, meaning future infrastructure improvements will focus on pedestrian connectivity within the resort and long-term public transport solutions at the Alpine Precinct scale. Developments and renewal within the village will continue to support a strong alpine design character, village heart and year-round uses”.</i></p>	<p>The Development will replace the existing bobsled which is nearing the end of its design life.</p> <p>The Development is located within an existing, predominately disturbed site. The site is identified in the Snowy SAP Master Plan as ‘Development area’.</p> <p>The Development will directly contribute to the enhancement of the existing village hub.</p>

		<p>The Development is consistent with the desired future character of Thredbo as it will provide a year-round recreational activity within the centre of the village. The Development has been designed to complement the existing alpine design character / built form (refer Section 8.6 for detail).</p> <p>The Snowy Mountains SAP Master Plan aims to ensure development maximises sustainability opportunities that contribute to the vision of becoming a year-round sustainable tourism destination. The Development will contribute to this vision through the following:</p> <p>The Development will provide a year-round recreational activity.</p> <p>The Development will not result in significant adverse impacts on cultural, heritage and biodiversity values within the locality.</p> <p>Climate change risks, hazards and opportunities have been considered in the design, construction and operation.</p>	
<b>Traffic and access</b>	Increase in congestion around VT.	<p>Section 7.12.2 – Operation.</p> <p>The Development has been designed with consideration of the year-round access requirements within and around the site. The following key elements have been incorporated into the design:</p> <p>The coaster track comprises sections elevated aboveground to minimise impacts on existing resort operations within the site and immediate surrounds.</p> <p>The uphill section of the coaster alignment comprises a tunnel within the lower section of the Sundance ski run to ensure there are no adverse impacts to the Merritts Gondola and Snowgums Chairlift bottom station access for skiers / snowboarders, mountain bike riders or snow groomers.</p> <p>The downhill sections of the track are elevated where the track traverses existing ski runs and trails to provide the necessary clearance for recreational activities and mountain operations (e.g. 3 m clearance for mountain bike trails and 4 m clearance for vehicle access tracks).</p> <p>The staff carpark adjacent to the bottom station building will be retained for staff only.</p> <p>Pedestrian networks and linkages will be retained and enhanced around the bottom station building (e.g. upgraded lighting and path resurfacing) to ensure safe access for guests.</p> <p>Fencing will be erected to divert public access from areas containing the bulk of the coaster track infrastructure (i.e. Snowgums Chairlift corridor and Lovers Leap ski run) (refer Site Analysis Plan, Drawing No. A1,218, Appendix B). The impacts of these exclusion areas are considered minor as these runs are not heavily utilised and skiers and snowboarders will still be able to access the Merritts Gondola and Snowgums Chairlift bases stations via the Sundance ski run.</p>	<p>Extensive planning of the Development has been undertaken to ensure the design does not impact upon year-round access requirements and uses within and around the site.</p> <p>The desired future character and use of the Valley Terminal precinct is to create a village hub with active frontages and to create a more connected environment. The upgrade of the bottom station area and existing footpaths linking both sides of the village will contribute to a more connected village.</p>
<b>Traffic and access</b>	Width of areas to skiers.		<p>The access width above the tunnel section/nearby bottom station is considered suitable for skiers who would be travelling at a slow speed in the approach to the chairlift bottom station. The corridor is ~10m wide. Fencing will be installed to guide skiers to keep within the ski run/corridor.</p>
<b>Traffic and access</b>	Impacts to the existing mountain bike training track below the gondola		<p>The existing skills park will remain operational for summer 2022/23.</p> <p>During construction, it is proposed the skills park below the gondola will be closed.</p> <p>Post construction, the area will be reassessed for suitability for use as a mountain bike skills development area.</p>
<b>Traffic and access</b>	Development appears to include a full conversion of old tennis courts to parking.	<p>Section 3.2.2 – Car parking.</p> <p>The existing staff car park below the proposed bottom station area will be reconfigured with fencing to provide for safer public access, and to ensure staff parking is retained. The car park will be line marked, allowing for 21 standard car parks, and two (2) accessible car parks. The design allows for a Village bus storage bay with removable bollards if required (refer Site Works Sheet 1 of 2, Drawing no. A1.225, Appendix B). The car and bus parking will remain for KT maintenance vehicles and staff only.</p> <p>Section 3.2.2 – Pedestrian access</p> <p>Pedestrian access from the east will be via the existing footpath from Valley Terminal. The pedestrian access to the existing bobsled area will be reconfigured and retained as part of the new bottom station to allow pedestrian access to be retained from the west. The existing staff cark will be reconfigured with fencing and signage to allow for safe pedestrian access to the bottom station. Refer to the site plans (Appendix B) for pedestrian access details.</p>	<p>The Development will not result in a full conversion of the old tennis courts to parking. It is fundamental that these parking sports are retained for use by operational staff vehicles and emergency service vehicles.</p> <p>Seating/tables and upgraded footpaths are proposed to enhance the pedestrian connectivity as well as provide areas for passive recreation.</p> <p>The Development will retain the existing mountain bike pump track on the existing disused tennis courts.</p> <p>The riparian vegetation and open space between the disused tennis courts and the Thredbo River will also be retained.</p>
<b>Traffic and access &amp; recreational use</b>	<p>Impacts to bobsled and access to Merritts Nature Track.</p> <p>Impacts to passive recreational uses.</p>	<p>See above Section 3.2.2.</p> <p>Section 4.4.1.1 – Alpine Sub-Precinct and Thredbo Village West Structure Plan.</p>	<p>The existing bobsled will be demolished subject to a separate approval.</p> <p>The existing footpath between Valley Terminal and the bobsled and Merritts Nature Track will be retained and improved. The footpath on the river side of the disused tennis courts will also be retained.</p>



	<p>Amore appropriate action would be to rehabilitate the tennis courts to allow green open space by the river and a walking track to allow better access to the Merritts Nature Track, and bobsled.</p>	<p>The design incorporates the redevelopment of existing footpaths and the staff carpark / hardstand area linking guests between the Valley Terminal base station area and the eastern side of the village (footpath into Woodridge precinct).</p> <p>Section 7.4.1 – social.</p> <p>The Development will provide social benefits for the community through the provision of an additional year-round recreational activity that has the ability to operate in varying weather conditions (i.e. operable during snow and rain). The Development will supplement the existing recreational activities offered within the resort. The design contributes to an activated public space providing equitable and safe pedestrian access and connections between different areas of the village hub. The inclusion of public seating, shelter and lighting will contribute to increased human activity within the locality and greater safety for guests.</p>	<p>The riparian corridor between the Thredbo River and the tennis courts will be retained. No impacts to this land are proposed. This area provides sufficient open space for guests to enjoy. The opposite side of the river also comprises a significant grassed area with tables and barbeques which provide passive recreational areas for guests.</p> <p>No adverse impacts to existing walking trails are proposed from the Development. Access to the Merritts Nature Track will be retained.</p> <p>There are several walking trails and areas of open space through the resort that can be utilised for passive recreation. The site is considered suitable to accommodate the Development as it is located within the village hub, predominately in a disturbed environment.</p>
<b>Water</b>	<p>Concentrated development close to Thredbo River.</p>		<p>The main elements of the Development are located outside of the riparian corridor associated with Thredbo River.</p> <p>The works within 40 m of Thredbo River are minor and located entirely within the existing footprint of the tennis courts. No adverse impacts are proposed.</p> <p>Appropriate stormwater management controls have been incorporated into the design to ensure no impacts to Thredbo River from the Development.</p>
<b>Built form</b>	<p>Large, bulky, obtrusive development.</p>	<p>Section 7.6 – built environment.</p> <p>Components of the Development are anticipated to enhance the built form within the resort. The Development has been designed to fit in with the existing built form. This is demonstrated through the following design elements:</p> <p>The Development is predominately located within existing disturbed areas to limit native vegetation clearing and the expansion of new development areas.</p> <p>The design comprises similar built form and style to existing buildings and associated infrastructure in the vicinity, such as skillion roof form, corrugated metal Colorbond walls and roof on buildings, crushed granite gabion walls and FRP decking treadwell on footpaths.</p> <p>The buildings and associated infrastructure have been designed to withstand the alpine climate i.e. the bottom station provides adequate shelter over the waiting area to provide protection from snow in winter and shade during summer for guests.</p> <p>The design incorporates rehabilitation and native landscaping consistent with landscaped areas in the vicinity. The design contributes to an activated public space providing equitable and safe pedestrian access and connections between the western and eastern side of the village.</p> <p>The design incorporates public seating, shelter and lighting which will contribute to increased activity within the locality and safety for guests.</p>	<p>The concentration of key developments within the Valley Terminal precinct is consistent with the desired future character of Thredbo described in the Snowy SAP Master Plan...” Developments and renewal within the village will continue to support a strong alpine design character, village heart and year-round uses”</p> <p>...</p> <p>The design of bottom station building is not dissimilar to other buildings within the Valley Terminal precinct.</p> <p>Whilst the Development will introduce new buildings and infrastructure, their locations and siting have been designed to mitigate potential impacts as much as possible. The bottom station will be landscaped and the coaster alignment maximises the use of existing vegetation screening and topography.</p>