



CLIENTS | PEOPLE | PERFORMANCE

Bushfire Assessment Report –
Addendum 1
5 Diggings Terrace Thredbo Ski Lodge
Development Application
(DA 22/11595)
Thredbo

December 2022



Background

In May 2022 GHD provided a Bushfire Assessment Report relating to an Integrated Development Application (NSW Department of Planning and Environment DA 22/11595) for development of a ski lodge (and associated in-house facilities/amenities for the convenience of lodge visitors) at 5 Diggings Terrace, Thredbo, NSW. As identified in GHD's Bushfire Assessment Report, the proposed development is a 'Holiday Let' form of 'tourist accommodation', classifiable as a *special fire protection purpose* development (SFPP development - as defined by Planning for Bushfire Protection (RFS, 2019)) and hence the proposed integrated development requires the issue of a Bush Fire Safety Authority from the NSW Rural Fire Service under section 100B of the *Rural Fires Act 1997*.

On or about 20 September 2022, the Department of Planning and Environment (DPE) duly referred DA 22/11595 to the NSW RFS, seeking general terms of approval for the integrated development. On 4 November 2022, the NSW RFS responded by letter (NSW RFS ref: DA20220908010522-Original-1) to DPE advising that further information is required to properly assess the integrated development application, and specifying the additional information required.

This addendum to the bushfire assessment report in support of DA 22/11595 is to address the RFS request for additional information.

1. Responses to RFS Request for Information

In response to the requests for information issued by NSW RFS, sections 1.1 to 1.4 set out the additional information requested. GHD (P. de Mar) consulted with RFS (D. Webster) on 6 December 2022 in relation to clarifying the particular nature of information sought by RFS.

1.1 RFS RFI item 1 – APZ in perpetuity maintenance mechanism

- 1. Adjoining lots to the east and west are not currently maintained in a manner consistent with the requirements of an Asset Protection Zone. Evidence of an appropriate mechanism to ensure that the identified APZ will be managed in perpetuity is required.*

GHD notes the unique nature of land tenure arrangements in the NSW Alpine Ski Resorts. As acknowledged in the Bushfire Assessment Report, the proposed APZ will extend beyond the sub-lessee's lot boundary (of Lot 768) onto adjacent leasehold land managed by the Head Lessee (Kosciuszko Thredbo Pty Ltd - KT). KT manages a number of Asset Protection Zones within its Head Lease area. To the full extent that the proposed APZ extends on to the head lease land area it is responsible for, KT has indicated its agreement to maintaining such designated APZ area as an APZ, in perpetuity. Official correspondence from KT confirming its commitment to maintaining any portion of the APZ (pertaining to general conditions of approval in a BFSA in respect of DA 22/11595) extending within its head lease area, in perpetuity, is attached at Appendix 1.



1.2 RFS RFI item 2– APZ clearing works approval

2. *Evidence of appropriate approvals for required clearing works should be provided.*

The clearing forms part of the proposed works and therefore the relevant approvals associated with the clearing are sought by the DA. GHD notes that the applicant (for DA 22/11595) has submitted a Biodiversity Development Assessment Report (BDAR) with the DA, covering clearing works associated with the development, specifically including APZ creation and maintenance. The BDAR has been prepared by an Accredited Biodiversity Assessor in accordance with relevant requirements specified by the Department of Planning and Environment (DPE). The BDAR is subject to review and acceptance (or otherwise) by the consent authority (DPE in conjunction with the National Parks and Wildlife Service). Clearance works for establishment and maintenance of the APZ will be in accordance with any conditions of development consent. Accordingly, at this time, the proponent is not in a position to provide evidence of the appropriate approvals for clearing works. GHD notes that during preparation of the DA, NPWS was consulted (via phone/web conference) with specific regard to likely APZ requirements.

1.3 RFS RFI Item 3 – implementation of existing APZ

3. A key objective of APZs is to create a defensible space that provides firefighters with a safe working environment (S 3.2.4 of PBP 2019). The report should provide details on how this can be achieved or propose suitable alternatives.

GHD notes a key objective of the APZ is to create a defensible space that provides firefighters with a safe working environment.

GHD notes that fire appliance access to the proposed ski lodge development is from Diggings Terrace (as is also the case for existing ski lodges immediately east and west of Lot 768). The portion of the APZ along the northern elevation of the proposed development (frontage to Diggings Terrace) is able to provide firefighters with a safe working environment. Adjacent land to the north of Diggings Terrace is occupied (for a distance exceeding 100 metres) by existing built development and clear open spaces including tennis courts and the Thredbo Village Green – this APZ provides a safe working environment for firefighters operating from the APZ portion on Diggings Terrace. The proposed ski lodge buildings (when built) will also shield firefighters from radiant heat from any fire located uphill to the south of the proposed development.

Access to portions of the APZ either side of the proposed ski lodge development are accessible from Diggings Terrace, from a downhill, fire appliance-accessible location with safe emergency egress.

The portion of the APZ behind the proposed ski lodge (uphill to the south) can be accessed by foot from fire appliances/crews operating from Diggings Terrace, where firefighters would arrive and operate from. Any fire in bushland adjacent to Lot 768 (to the south, south-west or south-east) almost certainly would not be accessed from the Alpine Way, as that would place firefighters on a steep slope above active fire - these are operating circumstances avoided by firefighters for safety reasons. Accordingly, the proposed APZ at the rear of the proposed ski lodge development will be accessible by hose crews operating from a

safe location on Diggings Terrace. Firefighter response, before and after fire approach downhill from the south of the development, is provided via the APZs east and west, from a safe anchor point on Diggings Terrace. Accordingly, GHD submits that the APZ design provides a defensible space providing firefighters with a safe working environment.

1.4 RFS RFI Item 4 – APZ maintenance on slopes > 18 degrees

4. The proposed APZ appears to be on land containing slopes in excess of 18°. Section 3.2.2 of PBP 2019 requires that a report demonstrates that effective management can occur. A management plan must be submitted with the DA to provide details on how this can occur. A management plan must be submitted with the DA to provide details on how the APZ will be implemented and maintained.

The management plan should include, but not be limited to:

- The mechanical means necessary to complete the management required;
- A schedule for maintenance to occur to ensure the APZ is regularly managed; and
- The relevant body responsible for maintaining the APZ.

GHD notes that the proposed APZ is 15 metres wide, and that some sections may contain slopes in excess of 18°. Presently, as depicted in Figure 4 in the Bushfire Assessment Report (copy of Figure 4 below), Lot 768 and the area between Lot 768 and the Alpine Way is maintained by KT as an APZ.





Slopes in excess of 18° are currently managed as APZ across much larger areas than the APZ specified for the proposed ski lodge on Lot 768. The existing APZ is maintained using hand held power tools including chainsaws for sapling removal and brushcutters for ground-cover vegetation management. These APZ maintenance methods have proven to be safely sustainable at the site, and would be continued for maintenance of the proposed APZ.

5 Diggings Terrace Ski Lodge APZ maintenance plan

| APZ section | Standard/Maintenance method | Schedule/trigger | Responsibility |
|-------------|--|---------------------------------|---|
| North | Minimal, if any, maintenance required (remove accumulated leaf litter) – APZ occupied by ski lodge frontage/access and Diggings Terrace | Check 1 OCT annually and action | Lot 768 owner |
| East | Maintain clear firefighter access to rear via eastern APZ and maintain landscaped ground cover in IPA condition by hand and/or brushcutter | Check 1 OCT annually and action | Lot 768 owner |
| South | Maintain APZ in IPA condition (maintained snow grass groundcover under retained isolated mature snow gums) using brushcutter | Check 1 OCT annually and action | Within Lot 768 – owner; Outside Lot 768 - KT |
| West | Maintain clear firefighter access to rear via western APZ and maintain landscaped ground cover in IPA condition by hand and/or brushcutter | Check 1 OCT annually and action | Lot 768 owner |



Appendix 1

**Letter from Kosciuszko
Thredbo Pty Ltd
confirming commitment
APZ implementation
adjacent to Lot 768**



Mr. David Harper
Next Level Twenty Four Pty Ltd
Level 3 59 Wentworth Avenue
Kingston ACT 2604

by email d.harper@lehunte.com.au

22 August 2022

Dear David,

**Vegetation management for providing and maintaining an adequate Asset Protection Zone (APZ)
for the proposed development of Lot 768, Thredbo**

I refer to the Development Application (PAN-250126) for the development of Lot 768 and specifically to the Bushfire Assessment Report prepared by GHD (May 2022).

Kosciuszko Thredbo (KT) understand that the bushfire assessment report has determined a minimum Asset Protection Zone (APZ) that will require on going vegetation management outside of Lot 768 and specifically in the residual head lease lands, Lot 876 to the south east and south west of Lot 768.

As previously indicated KT agrees to manage these APZ requirements on Lot 876 to the Planning for Bushfire Protection 2019 specifications in conjunction with the APZ requirements for Lot 772 Riverside Cabins.

Any such works will be in accordance with any relevant Development Approval, Bushfire Safety Authority and any requirements of the National Parks and Wildlife Service.

Yours sincerely,

A handwritten signature in black ink, appearing to read "A Harrigan", is written over a faint circular stamp.

Andrew Harrigan
Property and Development Manager