

09 June 2023

Ms Chloe Chalk
Planning Coordinator
Kosciuszko Thredbo Pty Ltd
PO Box 92
Thredbo NSW 2625

Dear Ms Chalk,



CONCISE STATEMENT OF HERITAGE IMPACT PROPOSED EXTERNAL WORK, VALLEY TERMINAL BUILDING FRIDAY DRIVE, THREDBO VILLAGE

This Statement of Heritage Impact has been prepared in response to a request for additional information in regard to DA 23/3863, for the proposed maintenance works including the removal and replacement of external cladding, roof sheeting and windows with like-for-like products to the Valley Terminal (VT) building. These elements have deteriorated in the harsh conditions of the alpine region, and their replacement will allow for the longevity of the building whilst retaining the original aesthetic design of the building.

The report evaluates the proposed development prepared by Kosciuszko Thredbo Pty Ltd (KT). It provides information, analysis and recommendations to enable the evaluation of the project in terms of:

- *Matters of National Environmental Significance, Significant impact guidelines 1.1, Environment Protection and Biodiversity Conservation Act 1999,*
- *Kosciuszko National Park Plan of Management (KNPPOM) 2006,*
- *State Environmental Planning Policy (Precincts - Regional) 2021 under the Environmental Planning and Assessment Act 1979*
- Heritage NSW (in the NSW Department of Premier and Cabinet) guidelines

It concludes that the cladding and window replacement to match existing profile, material, details and finishes will have an acceptable heritage impact.

We understand that this letter will accompany an application to be submitted for approval to the Minister for Planning, NSW Department of Planning and Environment.

METHODOLOGY AND STRUCTURE

This Statement of Heritage Impact has been prepared in accordance with the guidelines outlined in the Australia ICOMOS Charter for Places of Cultural Significance, 2013, known as The Burra Charter, and Heritage NSW (formerly the Heritage Office in the Heritage Division) publication, NSW Heritage Manual.

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The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words place, cultural significance, fabric, and conservation, is as defined in Article 1 of *The Burra Charter*. The *NSW Heritage Manual* explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

SITE IDENTIFICATION

The subject site is located Friday Drive, Thredbo, on the northern side of Friday Drive, and is known as the Valley Terminal. It is described by NSW Land Registry Services as Lot 862, DP1128686.

GBA Heritage acknowledges the traditional custodians of the subject site, and pay our respects to Elders past, present and emerging.

HERITAGE MANAGEMENT FRAMEWORK

The Heritage Management Framework of the Valley Terminal involves the following three heritage framework levels:

- National Heritage List (*Australian Alps National Parks and Reserves* (AANP));
- *Kosciuszko National Park Plan of Management 2006* (Kosciuszko National Park); and
- *State Environmental Planning Policy (Precincts - Regional) 2021* (SEPP Precincts-Regional).

The Valley Terminal building is located within Kosciuszko National Park, the largest National Park in NSW. It is listed as part of the Australian Alps National Parks and Reserves (AANP) on the *National Heritage List*. Guidelines for the AANP are contained within *Matters of National Environmental Significance, Significant impact guidelines 1.1*, under the *Environment Protection and Biodiversity Conservation Act 1999*.

Kosciuszko National Park, established in 1969, is protected by the *NSW National Parks and Wildlife Act 1974* and managed by the NSW National Parks and Wildlife Service under the *Kosciuszko National Park Plan of Management, 2006*. The Alpine Resorts, inclusive of the subject Valley Terminal Building are recognised within the *2006 Plan of Management* as being of state and regional significance.

The Valley Terminal is also identified as an individual heritage item in Schedule 3 of the *SEPP Precincts-Regional 2021*. Other listed items, including the Thredbo Alpine Hotel, Timber Pedestrian Bridge and ski lodge De Dacha, are located within the Terminal's vicinity.

As such, the relevant heritage provisions of the *Kosciuszko National Park Plan of Management 2006*, *EPBC Act 1999 Significant impact guidelines 1.1* and the *SEPP Precincts-Regional 2021* are applicable. As an item listed in the *SEPP Precincts-Regional 2021*, any Development Applications for the site are to be submitted to the Minister for Planning, NSW Department of Planning and Environment.

REPORT LIMITATIONS

While this report is limited to the analysis of European cultural heritage values, GBA Heritage recognises that for over forty thousand years or more Aboriginal people occupied the land that was later to be claimed as a European settlement.

Recommendations have been made on the basis of documentary evidence viewed and inspection of provided photographs of the site and building. Archaeological assessment of the subject site is outside the scope of this report.

This report only addresses the relevant heritage planning provisions and does not address general planning or environmental management considerations.

HISTORICAL SUMMARY

The Valley Terminal was completed in 1962 as part of the first development phase at Thredbo by Lend Lease, designed by Peter Storey, who also designed the Thredbo Alpine Hotel and the Eagles Nest chairlift station. The Valley Terminal replaced a previous small building at the bottom of the Crackenback chairlift, which was extended to its current summit in the same year. The Valley Terminal is noted to have housed a restaurant, an entertainment area known as 'The Den' with a bar, a medical centre, ski hire and accommodation for ski instructors, mountain staff and volunteer ski patrol.

Between 1963 and 1967, the Valley Terminal Building was upgraded. C.1990, the current colour scheme of the Valley Terminal was established by Architect Robin Dyke and his partner, landscape architect Jane Coleman, described as 'weathered grey'.

SITE DESCRIPTION AND CONTEXT

The Valley Terminal is located within the Kosciuszko National Park and, as such, is surrounded by vast areas of alpine bushland, with some managed lands surrounding Thredbo Village. The Valley Terminal occupies a site that sits slightly above and to the north of the Thredbo River. The river valley runs east-west, with the surrounding mountains enclosing the village of Thredbo. The Valley Terminal is central to activities within the Thredbo Valley.

The Valley Terminal is centrally located within the Thredbo Village, at the bottom of the earliest ski lifts and offers ski services, retail, cafe and access to the ski fields. The slope is generally consistent across the site; there is a significant upslope to the northwest and a consistent downslope towards Thredbo River.

The Valley Terminal is a long building running parallel with the contours across the site, from northeast to southwest. The long span of the gable roof is broken by both large gables with picture windows and timber cladding, as well as runs of small dormers windows. The vertical cladding and steep slope of the long gable form characterise the Valley Terminal's presentation.



Figure 1
Overview of the area of the subject site, arrow indicates the Valley Terminal building.
Source: Kosciuszko Thredbo Pty Ltd, 11.04.22



Figure 1
Facing towards staff accommodation, south end of building. Note cladding deterioration along base of the wall.
Source: Kosciuszko Thredbo Pty Ltd, 18.05.23



Figure 2
Facing Avalanche cafe. Note cladding deterioration.
Source: Kosciuszko Thredbo Pty Ltd, 18.05.23



Figure 3
External wall of retail store. Note cladding deterioration along base of the wall.
Source: Kosciuszko Thredbo Pty Ltd, 18.05.23



Figure 4
Window - northern end. Note the deterioration of both window and cladding fabric.
Source: Kosciuszko Thredbo Pty Ltd, 18.05.23



Figure 5
Staff accommodation windows, north elevation. Note deterioration of the roofing, poor condition of and installation of inappropriate sliding windows and some deterioration of timber cladding.
Source: Statement of Environmental Effect for Valley terminal building Thredbo NSW, Accent Town Planning Pty Ltd, February 2023



Figure 6
Recent replacement window above Avalanche cafe seating area, in appropriate matching style. As an example of the further window replacements to be made around the building.
Source: Kosciuszko Thredbo Pty Ltd, 18.05.23



Figure 7

Windows at the southern entrance. Note the deterioration of both the windows and cladding.

Source: *Statement of Environmental Effect for Valley terminal building Thredbo NSW*, Accent Town Planning Pty Ltd, February 2023



Figure 8

South-western corner of the valley terminal. Note the deterioration of windows, cladding and corrosion of the roof sheeting.

Source: *Statement of Environmental Effect for Valley terminal building Thredbo NSW*, Accent Town Planning Pty Ltd, February 2023

ESTABLISHED SIGNIFICANCE OF THE SUBJECT SITE

The Heritage Assessment Inventory for the *Thredbo Alpine Village, Kosciusko National Park, NSW, Conservation Plan, Vol 2 Inventory*, prepared by Clive Lucas, Stapleton and Partners Pty Ltd 1997, contains the following Statement of Significance for the Valley Terminal, focusing on its contribution to the Thredbo Village:

Statement of Significance:

Principle Significance:

The Valley terminal was a central development for the early head lessees, being the public area where all skiers passed through to gain access to the ski slopes. It also possesses the following values:

Historic:

It is an item which is representative of the earliest phase of development of Thredbo.

It is an item which is representative of the Lend Lease phase of the development of Thredbo.

Aesthetic:

It is an item which contains fabric which is representative of the earliest technology used in the post-war development of the New South Wales ski resorts.

It is an item which has strong 'Alpine' influence in its Architectural style.

It is an item which is part of a notable circulation and transportation route, and notable landmark significance contributing to the layout the Village complex.

It contributes to the townscape qualities of the River and lifts group of buildings.

Social:

It is an item which forms part of a group which is likely to be held in high regard regionally by the community for amenity reasons.

It is an item which is likely to be held in high regard by the first generation of residents of the village.

Additional aspects of the Valley Terminal's significance are understood to be:

Social Significance:

- Its long-term association with tourism-oriented activities within the Thredbo Valley.
- Its role as the central core of Thredbo Village, providing the majority of retail, conference, entertainment and hospitality services.

Aesthetic Significance

- Aesthetic significance as a landmark in the village, with a strong visual presence.
- Its general architectural form, especially the central roof line and prominent gable ends.

ESTABLISHED SIGNIFICANCE OF THE AUSTRALIAN ALPS NATIONAL PARKS AND RESERVES

The Valley Terminal is located within Thredbo Village, which is listed as part of *The Australian Alps National Parks and Reserves (AANP)*, as an item of national significance on National Heritage List.

The *Australian Heritage Database* contains a detailed Statement of Significance for *The Australian Alps National Parks and Reserves*, the following relevant information has been extracted (Place ID 105891):

Statement of Significance:

The Australian Alps National Parks and Reserves (AANP) are part of a unique Australian mountainous bioregion extending over New South Wales, the Australian Capital Territory and Victoria. The AANP displays a mosaic of interactions between its natural and cultural environments...

Snow-based recreation in the AANP commenced in Kiandra in 1861 with the establishment of the Kiandra Snowshoe Club and expanded from an ad hoc activity by enthusiasts to a multi-million dollar snow sport and tourism industry, today with substantial ski slopes and village resorts. The government hotels established in scenic locations - the Mount Buffalo Chalet, the Yarrangobilly Caves House and Precinct, the Chalet at Charlottes Pass, the Hotel Kosciuszko (former) and Mount Franklin Chalet (former) were major features of the expanding activity in the early twentieth century.

The Valley Terminal is one of a few ski lift terminal buildings that form part of the Snow-based recreation facilities within the AANP. Its scale, location within the centre of Thredbo Village, and overall 'Alpine' aesthetic contribute to its landmark qualities within AANP.

THE DEVELOPMENT PROPOSAL

The development application has been prepared by Kosciuszko Thredbo Pty Ltd (KT). The proposal is detailed in the Statement of Environmental Effects that accompanies this application. It includes:

The proposed maintenance work will include:

- The removal of existing deteriorated native hardwood cladding and replacement with like-for-like product... This application is seeking approval for the entirety of the building, to allow Kosciuszko Thredbo to replace deteriorated cladding for the entirety of the building as needed.*
- The removal of existing deteriorated corrugated metal roof sheeting and replacement with like-for-like product... for the entire building, to be replaced as required.*
- The removal of windows and replacement with like-for-like product... all windows within the Valley Terminal building (excluding windows that have been recently replaced)... as required.*

The proposal does not intend to alter the finishes or appearance of the Valley Terminal. The replacement of deteriorated painted vertical timber cladding, metal roof sheeting (likely galvanised steel), windows (both anodised aluminium and timber), and if required, any additional fabric found to be deteriorated beyond repair, will help conserve the Valley Terminal and its presentation within Thredbo Village into the future.

ASSESSMENT OF HERITAGE IMPACT

OVERVIEW OF THE POTENTIAL HERITAGE IMPACTS

The proposal allows for the conservation of the Thredbo Valley Terminal, increasing its longevity. The reconstruction work replaces the existing fabric like-for-like and is considered to have a neutral impact on the Valley Terminal itself, the Kosciuszko National Park, or AANP.

CONSIDERATION OF THE GUIDELINES OF HERITAGE NSW

Heritage NSW (in the NSW Department of Planning and Environment) has published a series of criteria for the assessment of heritage impact. The relevant 'questions to be answered' in the *NSW Heritage Manual* 'Statements of Heritage Impact', provided below, have been considered in the preparation of our assessment:

The following aspects of the proposal respect or enhance the heritage significance of the adjacent item for the following reasons:

- The proposal forms part of the required conservation of the Valley Terminal.
- The proposal sympathetically replaces the existing deteriorated fabric to match the existing.
- The proposal is not considered to impact the Kosciuszko National Park, or AANP negatively.

Re-cladding

- *Have previous (including original) roofing/cladding materials been investigated (through archival and physical research)?*
- *Is a previous material being reinstated?*
- *Will the re-cladding effect the conservation of the fabric of the heritage item?*
- *Are all details in keeping with the heritage significance of the item (eg guttering , cladding profiles)?*
- *Has the advice of a heritage consultant or skilled tradesperson (eg slate roofer) been sought?*

Comment:

Wall Cladding:

The original Valley Terminal cladding material is understood to be the existing vertical ship-lap hardwood timber finish. The vertical ship-lap hardwood timber cladding finish has also been utilised in later alterations to the Terminal. The proposal removes the wall cladding that is deteriorated and rotting in some locations and reinstates the vertical timber to match the existing. The replacement of the hardwood timber is to match the existing in terms of profile, material, colour, and finishes; no further mitigation is therefore considered required. The replacement of the deteriorating fabric forms part of the conservation of the Valley Terminal.

Roof cladding:

Similarly, early photographs confirm that the Valley Terminal has always been clad with corrugated sheet metal roofing, which is understood to be the majority of the existing sheeting to the Valley Terminal. The Roof sheeting replacement will match the existing corrugated sheet metal roof in terms of material, profile, colour and finishes. The existing likely galvanised steel roof cladding is corroded and failing in some locations; the proposed replacement of the roof cladding to match the existing material, form and profile, as part of the ongoing conservation of the Valley Terminal.

CONSIDERATION OF THE SIGNIFICANCE OF THE AUSTRALIAN ALPS NATIONAL PARKS AND RESERVES (AANP)

The Valley Terminal at Thredbo is situated within Kosciuszko National Park and thus part of the AANP, which is listed on the National Heritage List. Therefore, the *EPBC Act 1999 Matters of National Environmental Significance – Significant Impact Guidelines 1.1 (2013)* apply and have to be addressed in the evaluation of potential impacts by the proposal on the established cultural significance of the AANP. The below relevant values for assessment have been extracted below from the *Significant Impact Guidelines 1.1 (2013)*:

National Heritage places with cultural heritage values:

An action is likely to have a significant impact on historic heritage values of a National Heritage place if there is a real chance or possibility that the action will:

- *permanently remove, destroy, damage or substantially alter the fabric⁷ of a National Heritage place in a manner which is inconsistent with relevant values*
- *extend, renovate, refurbish or substantially alter a National Heritage place in a manner which is inconsistent with relevant values*
- *make notable changes to the layout, spaces, form or species composition of a garden, landscape or setting of a National Heritage place in a manner which is inconsistent with relevant values.*

Comment:

The proposed replacement of deteriorated fabric to match the existing is considered to be consistent with the site's heritage values. As the material in disrepair is being replaced to match the existing, the changes proposed are not considered to form a notable change to the Valley Terminal.

If additional fabric is found to be required to be replaced as part of the proposed maintenance works, any replacement fabric to match the existing profile, material, colour, detail and finishes, is deemed to be consistent with the relevant values of the site.

CONSIDERATION OF THE KOSCIUSZKO NATIONAL PARK PLAN OF MANAGEMENT (KNPPOM) 2006

The *Kosciuszko National Park, Plan of Management (KNPPOM) 2006* is the guiding document for the NSW National Parks and Wildlife Service (NPWS) in managing Kosciuszko National Park. It provides a framework of objectives, principles and policies to guide the long-term management of the broad range of values contained in the park. The relevant principles, objectives and policies have been extracted below:

4.2 Overarching Principles

Maintain or improve the condition of the natural and cultural values that together make the park a special place.

4.3 Key Desired Outcomes

Recreational values

- *Visitor experiences are enhanced through the availability of a greater variety of recreational opportunities and facilities across a broad spectrum of settings, particularly for visitors with special needs;*
- *All NPWS visitor facilities reflect a consistent 'signature' appearance and construction, showcasing excellence in environmental design, siting and performance;*

Alpine resorts

- *The alpine resorts are recognised as being of state and regional significance and are managed according to the provisions of this plan and the Alpine Resorts Environmental Planning Instrument prepared by the Department of Planning.*

7.1.1 Management Objective

The cultural heritage values of the park are protected and managed in a strategic, comprehensive and integrated way.

10.2.1 Management Objective

The alpine resorts provide for a range of principally snow-based recreational opportunities that promote enjoyment, understanding and appreciation of the natural and cultural values of the park.

11.6.3 Management Objective

Scenic quality within the park is maintained and, wherever possible, enhanced.

Comment:

- The proposed replacement of wall and roof cladding and windows forms part of the maintenance of the site and, therefore, is considered to meet the management plan's overarching objectives.
- These maintenance works will allow the visitor and worker experience of the Valley Terminal to be continued.
- The elements are proposed to be replaced to match the existing, retaining the "signature appearance" of the Terminal.
- The proposal is considered to meet the principles of this plan, and Precincts-Regional SEPP, as assessed within the following section.
- The heritage value and scenic quality of the Valley Terminal will be maintained by allowing the necessary replacement of deteriorating fabric to match existing.
- The proposal is considered to beneficially affect the Valley Terminal presentation within the *Kosciuszko National Park* and the Terminal's ongoing ability that provide snow-based recreational opportunities well into the future.

HERITAGE OBJECTIVES OF THE SEPP PRECINCTS-REGIONAL 2021

The proposed development is considered to be acceptable, from a heritage perspective, for the following reasons:

- The proposed changes are relatively minor and part of the maintenance of the site.
- The proposal forms part of the required conservation of the Thredbo Valley Terminal.
- By only replacing the exterior cladding to match the existing, the general form and appearance of the building will not change, thereby maintaining the established heritage significance of the building as well as the existing setting and views.
- The removal of some original fabric is considered acceptable given that the proposal sympathetically replaces deteriorated fabric with new to match the existing in terms of profile, material, colour and finishes.
- No structural changes are proposed.
- The significance of the Valley Terminal and its ability to contribute to the Thredbo Village, Kosciuszko National Park, and AANP will be retained.

The proposal is, therefore, considered to be consistent with the relevant heritage objectives of the *State Environmental Planning Policy (Precincts—Regional) 2021*, which are:

4.21 Heritage conservation

(1) *The objective of this section is to conserve—*

(a) *the environmental heritage of the Alpine Region, and*

(b) *the heritage significance of heritage items, including associated fabric, settings and views, and*

(2) *Development consent is required for the following in the Alpine Region—*

(b) *altering a heritage item, including by doing the following to a heritage item that is a building—*

(i) *making changes to the detail, fabric, finish or appearance of the building's exterior,*

(ii) *making structural changes to the building's interior,*

Additionally, as the proposed development is for the maintenance of a Heritage Item and will have an acceptable effect on the heritage significance of the Valley Terminal, it may be permitted without consent under the following clause of the *SEPP Precincts-Regional 2021*:

- (4) *The consent authority may, before work is carried out, give written notice to an applicant for development consent that development consent is not required under this section if the consent authority is satisfied the development—*
- (a) is of a minor nature or is for the maintenance of the heritage item, and*
 - (b) the development will not adversely impact the heritage significance of the heritage item.*

CONCLUSIONS

- Thredbo Valley Terminal is listed as an item of state heritage significance in Schedule 3 of the *SEPP Precincts-Regional 2021*.
- It is also located within the Nationally listed *Australian Alps National Parks and Reserves (AANP)*, and Kosciuszko National Park.
- The significance of the Valley Terminal and its ability to contribute to the Thredbo Village, Kosciuszko National Park and AANP, will be retained.
- The proposed alterations to the Valley Terminal will have no adverse impact on the heritage significance of the adjacent properties Thredbo Alpine Hotel, Timber Pedestrian Bridge, De Dacha, or the Kosciuszko National Park and AANP.
- The removal of some original fabric is considered acceptable given that the proposal sympathetically replaces the existing fabric with new to match the existing in terms of profile, material, colour and finishes.
- The proposal forms part of the required conservation of the Valley Terminal.
- The proposed development is consistent with the heritage requirements and guidelines of the:
 - *State Environmental Planning Policy (Precincts-Regional) 2021*
 - *Kosciuszko National Park Plan of Management 2006*
 - *Matters of National Environmental Significance, Significant impact guidelines 1.1*
- The proposed development is consistent with the heritage objectives of the *SEPP Precincts-Regional 2021* and may be permitted without consent under clause 4.21 (4).
- This Statement has referred to the *Bushfire Hazard Assessment Report, External Maintenance Work to Valley Terminal Building*, prepared by Accent Town Planning, which has not advised that non-combustible materials are required. However, we understand that the NSW Rural Fire Service have yet to provide their advice.

RECOMMENDATIONS

- The Minister for Planning, NSW Department of Planning and Environment should have no hesitation, from a heritage perspective, in approving this development application.
- The proposed exterior timber cladding is to be sourced from products with a similar profile to the existing timber cladding.
- The proposed metal and timber windows are to have a similar configuration and profile to the existing, metal and timber windows.

Yours faithfully,
GBA Heritage Pty Ltd



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