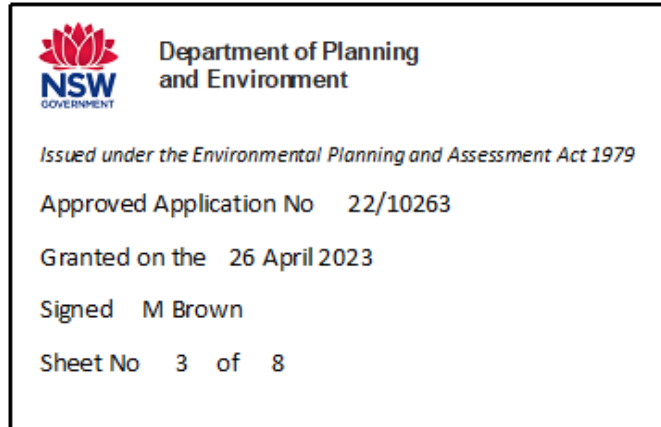


13 April 2022

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

Dear Ms Chalk,



GBA
Heritage

CONCISE STATEMENT OF HERITAGE IMPACT PROPOSED CLADDING REPLACEMENT THREDBO ALPINE HOTEL

This Statement of Heritage Impact has been prepared to accompany a development application for the proposed removal of existing native hardwood cladding and replacement with a like-for-like timber product, to the Thredbo Alpine Hotel, inclusive of associated businesses and Thredbo Information Centre located onsite. The existing cladding has deteriorated and rotted; its 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 replacement with new cladding to match in terms of profile, material 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 at 17 Friday Drive, Thredbo, on the southern side of Friday Drive and the northern side of Mowamba Place, and is known as the Thredbo Alpine Hotel. It is described by NSW Land Registry Services as Lot 861, DP 1128686.

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 Thredbo Alpine Hotel 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).

Thredbo Alpine Hotel 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 Hotel, are recognised within the *2006 Plan of Management* as being of state and regional significance.

The Thredbo Alpine Hotel is also identified as an individual heritage item in Schedule 3 of the *SEPP Precincts-Regional 2021*. Other listed items, including the Valley Terminal, Timber Pedestrian Bridge and four ski lodges (Crackenback, Moonbah, Sastrugi, De Dacha), are located within the hotel'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 the existing fabric. 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 Thredbo Alpine Hotel was initially constructed over the summer of 1961-62 and has undergone numerous alterations and expansions since that time. The following is a summary list of the main periods of construction altering the external design of the hotel:

- 1961-61: Initial design and stage 1 construction.
- 1962-63: Stage 2 construction, including major design changes.
- 1967: New west wing and extensive alterations to the original hotel section. Bistro terrace and northern courtyard area constructed.
- 1984: New conference centre (Ross Bonthorne).
- Early 1990s: New colour scheme (Robin Dyke and Jane Coleman).
- 1994: Upgrade and refurbishment of the restaurants and concourse area and new food outlet in the eastern part.
- 1994: New Thredbo Resort Information Centre.
- 2000: Upgrade of the lounge bar and the surrounding area after a fire.
- 2019: refurbishment of the poolside terrace and poolside bar upgrade works, erection of roof over bistro terrace.

SITE DESCRIPTION AND CONTEXT

Thredbo Alpine Hotel is located within the Kosciuszko National Park and as such, is surrounded by vast areas of alpine bushland. The Thredbo Alpine Hotel occupies a site that sits slightly above and to the south of the Thredbo River. The river valley runs east west with the surrounding mountains enclosing the village of Thredbo.

The Thredbo Alpine Hotel is centrally located within the Thredbo Village, at the bottom of the earliest ski lifts and offers ski hire, services and access to the ski fields. The hotel has become a central meeting and circulation area, providing access to a mix of retail, hospitality, and accommodation uses that support and provides services to the lodges that make up the bulk of the village buildings.

The Thredbo Alpine Hotel can be understood as roughly an uneven 'U' shape, with a courtyard sitting within the crook of the building facing north, towards the mountain ski lifts. The building sits within the sloped site providing a single storey when entered from the south, and three stories when entered from the northern or eastern sides. A series of additions to the initial building has resulted in an eclectic collection of distinctive buildings and site elements of varying ages, scales and architectural imagery. Sloping roofs characterise the overall form, the large, long-span roof of the main building being its most prominent form.



Figure 1
View to Thredbo Alpine Hotel, as viewed from North of the subject site



Figure 2
View of the main entrance.
Source: Kosciuszko Thredbo Pty Ltd, 22.02.22



Figure 3
View of Hotel Terrace
Source: Kosciuszko Thredbo Pty Ltd, 22.02.22



Figure 4
Deteriorated timber cladding, at the rear corner of the hotel near Mowamba Place.
Source: Kosciuszko Thredbo Pty Ltd, 22.02.22



Figure 5
Windows on main entrance side of hotel, above carpark, note cladding deterioration particularly around window sill, and exposed bottom edge.
Source: Kosciuszko Thredbo Pty Ltd, 22.02.22



Figure 6
Wall above maintenance workshop, note failing cladding.
Source: Kosciuszko Thredbo Pty Ltd, 22.02.22

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 Thredbo Alpine Hotel, focusing on its contribution to the Thredbo Village:

Statement of Significance:

Principle Significance:

Thredbo Alpine Hotel (formerly the Coach Horse Inn) possesses particular association with the Syndicate and early Lend Lease eras, providing the central place of accommodation provided by the head lessee as required by their lease.

Historic:

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

Aesthetic:

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 within the village complex.

It is an item which is of notable landmark significance contributing to the layout of the village complex.

It contributes to the townscape qualities of the Ponds & River group of buildings.

Social:

It is an item which is likely to be held in high regard by the first generation of ski enthusiasts that used the village.

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

Social Significance:

- Its association with tourism-oriented activities since 1963.
- 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 from some locations.
- Its general architectural form, especially the rooflines of the central and western accommodation wings.

ESTABLISHED SIGNIFICANCE OF THE AUSTRALIAN ALPS NATIONAL PARKS AND RESERVES

Thredbo Alpine Hotel 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 Kosciusko (former) and Mount Franklin Chalet (former) were major features of the expanding activity in the early twentieth century.

The Thredbo Alpine Hotel is one of the many Hotels 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 Project will comprise the removal of existing native hardwood cladding and replacement with a like-for-like timber product.

As part of the works, some windows may require replacement if it is determined necessary upon removal of cladding and frames. Where this is required, new windows will comply with Australian Standard 3959: Construction of buildings in bushfire-prone areas.

The proposal does not intend to alter the finishes or appearance of the Thredbo Alpine Hotel. On the contrary, the replacement of deteriorated painted vertical timber cladding and, if required, any additional deteriorated fabric, will help conserve the Thredbo Alpine Hotel and its presentation within Thredbo Village into the future.

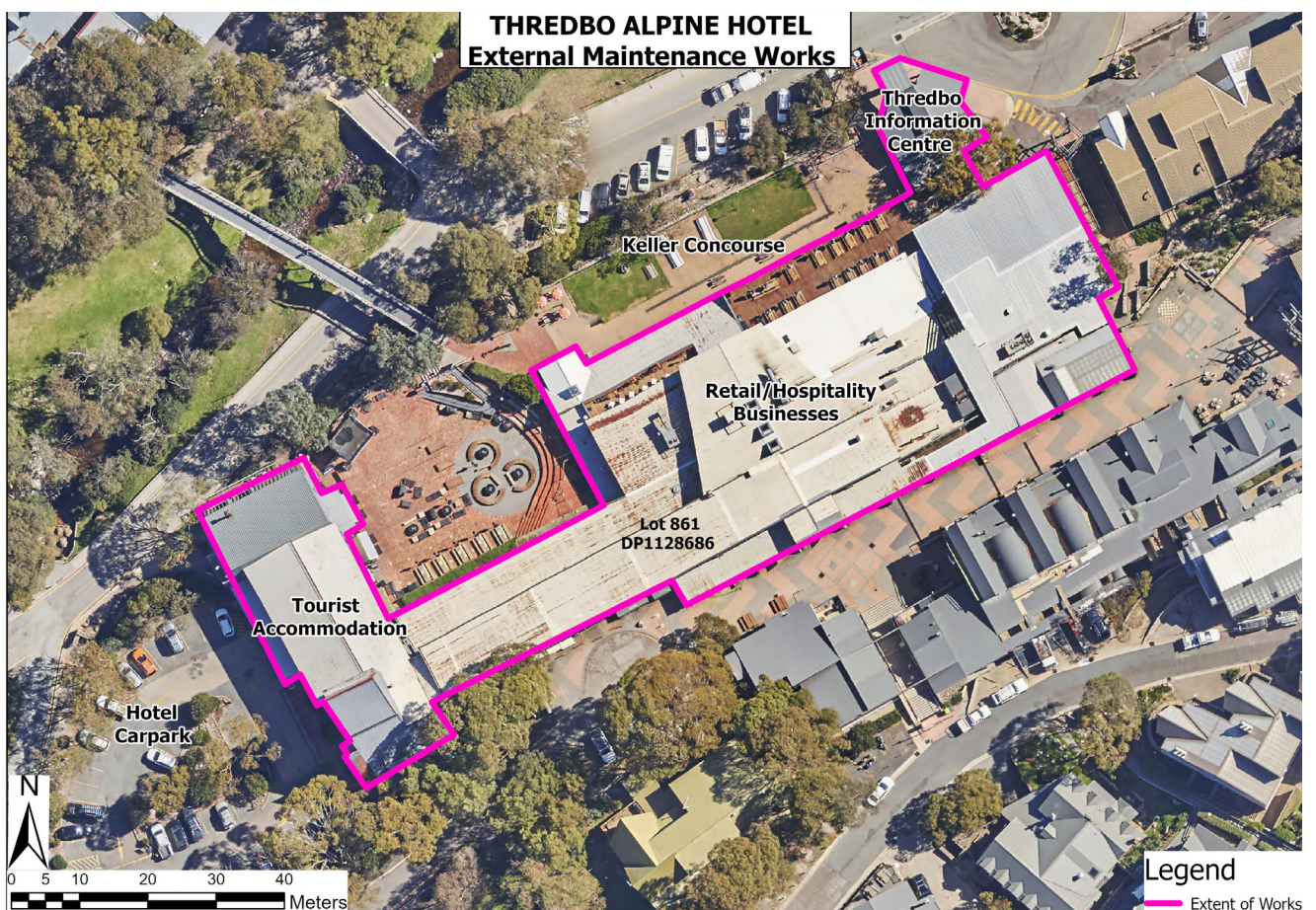


Figure 7
Overview of the area of the subject site, in which the works are located.
Source: Kosciuszko Thredbo Pty Ltd, 11.04.22

ASSESSMENT OF HERITAGE IMPACT

OVERVIEW OF THE POTENTIAL HERITAGE IMPACTS

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

CONSIDERATION OF THE GUIDELINES OF HERITAGE NSW

Heritage NSW (formerly the Heritage Office in the Heritage Division) 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 Thredbo Alpine Hotel.
- The proposal sympathetically replaces the existing ship-lap finish hardwood timber cladding with new cladding to match the existing in terms of profile, material, colour and finishes.
- The proposal is not considered to form any negative impact on the Kosciuszko National Park, or AANP.

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: The original Thredbo Alpine Hotel cladding material is the existing vertical ship-lap hardwood timber finish. The vertical ship-lap hardwood timber cladding finish has been utilised in later alterations and additions to the Hotel. The proposal removes the existing cladding that is deteriorated and rotting in some locations and reinstates the vertical timber to match the existing. By replacing the Hardwood timber to match existing in terms of profile, material colour, and finishes, no further mitigation is required. The replacement of the deteriorating fabric forms part of the conservation of the Thredbo Alpine Hotel.

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

The Thredbo Alpine Hotel 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 cladding to match existing is considered to be consistent with the site's heritage values. The proposed works are not considered to form a notable change to Thredbo Alpine Hotel.

If additional replacement of structural elements and window fabric are found to be required as part of the proposed works, as long as these elements are replaced to match existing in terms of profile, material, colour and finishes, they are deemed to be consistent with the relevant values of the site, and therefore considered acceptable in terms of the above values.

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 cladding and potentially additional deteriorating fabric forms part of the maintenance of the site and, therefore, is considered to meet the management plan's overarching principles.
- These maintenance works will allow the visitor's experience of the Thredbo Alpine Hotel to be continued.
- The elements are proposed to be replaced to match existing, retaining the "*signature appearance*" of the Hotel.
- 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 Thredbo Alpine Hotel will be maintained by allowing the replacement of deteriorating fabric to match existing.
- The proposal is considered to beneficially affect Thredbo Alpine Hotels presentation within the *Kosciuszko National Park* and the Hotels 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 minor
- The proposal forms part of the required conservation of the Thredbo Alpine Hotel.
- 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 significance of the Thredbo Alpine Hotel 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:

4.24 Heritage conservation

(1) **Objectives** *The objectives of this section are as follows—*

- (a) *to conserve the environmental heritage of the land to which this Chapter applies, and*
- (b) *to conserve the heritage significance of heritage items, including associated fabric, settings and views.*

Additionally, as the proposed development is minor and will not have an adverse effect on the heritage significance of the Thredbo Alpine Hotel, it may be permitted without consent under the following clause of the *SEPP Precincts-Regional 2021*

4.24 Heritage conservation

(3) **When consent not required**

However, consent under this section is not required if—

- (a) *the applicant has notified the consent authority of the proposed development and the consent authority has advised the applicant in writing before any work is carried out that it is satisfied that the proposed development—*
 - (i) *is of a minor nature, or is for the maintenance of the heritage item, and*
 - (ii) *the proposed development would not adversely affect the heritage significance of the heritage item,*

CONCLUSIONS

- Thredbo Alpine Hotel 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 Thredbo Alpine Hotel and its ability to contribute to the Thredbo Village, Kosciuszko National Park and AANP, will be retained.
- The proposed alterations to Thredbo Alpine Hotel will have no adverse impact on the heritage significance of the adjacent properties Crackenback, Moonbah, Sastrugi, 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 Thredbo Alpine Hotel.
- 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 4.24 (3).

RECOMMENDATION

The Minister for Planning, NSW Department of Planning and Environment should have no hesitation, from a heritage perspective, in approving this development application.

Yours faithfully,
GBA Heritage Pty Ltd



Mariah Hart
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