

Thredbo Golf Course Subdivision – Applicant response to public submissions

NSW Planning Portal Reference: PAN-366203 (DA 23/13081)

Public exhibition period: 09/10/2023 - 06/11/2023

SUMMARY OF PUBLIC SUBMISSIONS

A total of 23 submissions were received during the public exhibition period for the Development (note, submission #4 and #22 are duplicated).

The submissions received have been grouped into two key stakeholder categories, refer **Table 1**.

Table 1: Stakeholder categories

STAKEHOLDER CATEGORY	NO. OF SUBMISSIONS
Adjacent sublessee - Riverside Cabin owners	14
Interested party - no details provided, Thredbo visitor, village sublessee	9

A summary of the stakeholder categories, submission reference (collated submissions publicly available on the NSW Planning Portal) and key issues/matters raised in each submission is provided in **Table 2**.

Table 2: Summary of public submissions

	Submitter	Stakeholder category	Submission reference	Key issues / matters raised
1)	Greg Barnett	Riverside Cabin owner (adjacent sublessee)	02.11.2023, p.2-14	- Car parking/ access road – headlights into Riverside Cabins - Proximity to Thredbo River - Loss of amenity - Bushfire risk - Impacts to recreational values - Development alternatives for car parking and proposal
2)	Charles Howse	Riverside Cabin owner (adjacent sublessee)	3 November 2023, pp.15-16	- Car parking - Thredbo River impacts - Loss of amenity - Impacts to recreational values
3)	Andrea Ehlers	Riverside Cabin owner (adjacent sublessee)	3 November 2023, pp.17-20	- Car parking - Proximity to Thredbo River / Stormwater / water quality impacts - Loss of amenity - Impacts to recreational values
4)	No name <i>same submission as Submission #22</i>	Thredbo visitor (community member)	Submitter 4 Nov 11:50, pp.21-22	- Car parking/traffic impacts and public safety - Loss of recreational values/ Riverside Walk impacts - Impacts to wildlife

	Submitter	Stakeholder category	Submission reference	Key issues / matters raised
				Development alternatives for car parking
5)	Annalisa Koeman	4 Banjo Drive (Sublessee)	4 November 2023, pp.23-24	- Car parking/traffic impacts - Proximity to Thredbo River - Loss of amenity - Loss of recreational values - Impacts to golf course - Development alternatives for car parking
6)	James Price	Riverside Cabins Associated Inc (adjacent sublessee)	1 November 2023, pp.25-26	- Car parking / access road location / traffic impacts – headlights into Riverside Cabins - Proximity to Thredbo River - Impacts to recreational values - Loss of amenity - Development alternatives for car parking
7)	No name	Riverside Cabin owner (adjacent sublessee)	pp.27-28	- Car parking / access road location / traffic impacts - Proximity to Thredbo River / Stormwater / water quality impacts - Loss of amenity - Loss of recreational value - Impacts to flora and fauna
8)	Megan Keaney	Riverside Cabin owner (adjacent sublessee)	31 October 2023, p.29	- Car parking - Visual impacts - Development alternatives for car parking
9)	No name	No details (interested party)	p.30	- Water quality impacts - Loss of amenity / visual impacts - Impacts to golf course - Bushfire risk - Biodiversity and environmental impacts – vegetation clearing
10)	No name	No details (interested party)	p.31	- Loss of recreational values / impacts to golf course - Biodiversity and environmental impacts - Alternative sites for development
11)	No name	Riverside Cabin owner (adjacent sublessee)	p.32	- Car parking / traffic impacts – safety, environmental, aesthetic and noise impacts - Amenity and visual impacts - Riverside Walk impacts - Environmental impacts
12)	No name	Riverside Cabin owner (adjacent sublessee)	p.33	Car parking – visual and amenity impacts – headlights into Riverside Cabins
13)	No name	No details (interested party)	11 November 2023, pp.34-35	Car parking and road design – headlights into Riverside Cabins, visual and amenity impacts

	Submitter	Stakeholder category	Submission reference	Key issues / matters raised
				- Impacts to watercourses/flows/Thredbo River - Bushfire risk - Impacts to Thredbo River walk - Biodiversity impacts – vegetation clearing - Development alternatives in Jindabyne and Thredbo
14)	No name	Riverside Cabin owner (adjacent sublessee)	p.36	- Car parking/Traffic impacts - Development alternatives for car parking
15)	Henri Young	No details (interested party)	p.37	- Impacts to recreational values / impacts to golf course - Bushfire risk - Alternative sites for development in Thredbo
16)	No name	Riverside Cabin owner (adjacent sublessee)	p.38	- car parking / traffic impacts – headlights into Riverside Cabins, loss of amenity - proximity to Thredbo River - impacts to Riverside Walk - Development alternatives for car parking
17)	No name	Riverside Cabin owner (adjacent sublessee)	pp.39-40	- car parking and road location – safety, amenity (headlights into Riverside Cabins) and traffic impacts - impacts to Riverside Walk and recreational values - wildlife impacts - development alternatives for car parking - stormwater / water quality impacts / proximity to Thredbo River
18)	Robyn Williams AO	Riverside Cabin owner (adjacent sublessee)	p.41	- Car parking – Riverside walk impacts, traffic impacts, visual impacts, car noise and headlights - Visual impacts - Impacts to Riverside walk and recreational values - Impacts to native fauna
19)	Geoff Bennett	Riverside Cabin owner (adjacent sublessee)	p.42	- Car parking - Loss of amenity – noise and visual - Riverside Walk impacts - Impacts to native wildlife - Alternative site for car parking within golf course
20)	No name	No details (interested party)	p.43	- Car parking – impacts to Thredbo River, visual impacts, headlights and noise impacts, - Traffic impacts - Water quality / stormwater impacts - Loss of amenity

	Submitter	Stakeholder category	Submission reference	Key issues / matters raised
				- Loss of recreational values - Environmental impacts – wildlife
21)	No name	No details (interested party)	p.44	- car parking/ traffic impacts - impacts to Thredbo River / stormwater impacts - impacts to recreational values - Development alternative for carparking offsite
22)	No name <i>same submission as Submission #4</i>	Thredbo visitor (community member)	4 November, p.45	- Car parking/traffic impacts and public safety - Loss of recreational values/ Riverside Walk impacts - Impacts to wildlife - Development alternatives for car parking
23)	Natalie Enninghost	Riverside Cabin owner (adjacent sublessee)	2.11.2023, pp.46-49	- Car parking – impacts to walkers and safety concerns, proximity to community centre, headlights into Riverside Cabins, amenity - Emergency access – dead end location - Environmental impacts – proximity to Thredbo River, wildlife habitat - Alternative development site – extension of Crackenback

SUMMARY OF KEY TOPICS

The main issues raised by stakeholders during the public submission period are summarised below:

- Traffic and access
 - Car park design – proximity to Thredbo River and Riverside Cabins, amenity impacts, noise generated from people unpacking cars and vehicle noise, headlights shining directly into Riverside Cabins, impacts to Riverside Walk, impacts to recreational values associated with Thredbo River including swimming and fishing
 - Road design – proximity to Thredbo River and Riverside Cabins, amenity impacts, vehicle noise, impacts to Riverside Walk, impacts to recreational values in the locality,
 - Public safety concerns – increase in vehicle traffic generated by subdivision and public car park
- Water impacts
 - Impacts to water quality
 - Inadequate stormwater controls and management
 - Proximity to Thredbo River
- Impacts to recreational and social values in the locality
 - impacts to Riverside Walk
 - impacts to recreational activities associated with Thredbo River, such as swimming, fishing and photography
 - impacts to activities such as golfing, socialising, walking, picnicking that are carried out in the golf course catchment

- Biodiversity and environmental impacts
- Amenity impacts
- Bushfire risks

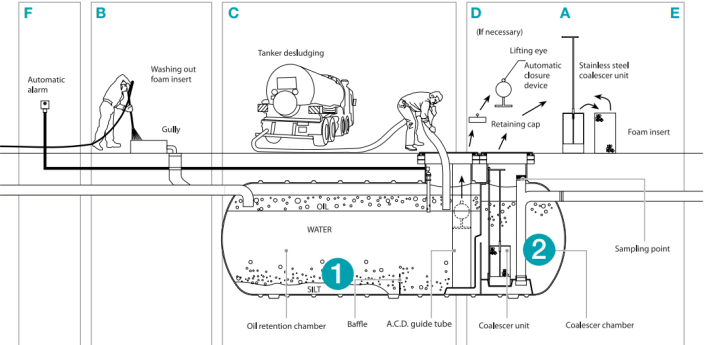
RESPONSE TO KEY MATTERS RAISED

The Applicant has undertaken a review of all public submissions provided in the collated submissions document (PAN-366203 – DA 23/13081 Thredbo Golf Course EXH-6121 – Submissions). Many of the submissions included similar themes of concerns. As such, a response to each individual submission has not been prepared. **Table 3** categorises the key matters/concerns, responses and references update documentation where applicable.

Table 3: Key matters and responses to public submissions

KEY MATTERS	RESPONSE
Road impacts on existing environmental and social values	The first section of the new access road has been re-aligned outside of Thredbo River's riparian corridor (30 m from the highest bank), and further away from the Riverside Walk in response to concerns raised regarding proximity to Thredbo River and impacts to the recreational values in this area such as the Riverside Walk. Traffic impacts have been assessed by a suitably qualified traffic consultant, refer Traffic Impact Assessment prepared by O'Brien Traffic. Details shown on updated Civil plans, Architectural plans, Landscape plans.
Road design	Alternatives to the proposal within the golf course catchment were considered during the planning phase, details are provided in the SEE. The start of the access road has been shifted uphill to create a greater separation from the Riverside Walk and Thredbo River. No road infrastructure will be located within the Vegetated Riparian Zone of Thredbo River (30 m from high bank). Works within waterfront land (40m from watercourse) are permitted with a Controlled Activity Approval (CAA) which will be obtained prior to the commencement of works. No works will occur within the Inner Riparian Corridor of Thredbo River. Screen planting has been incorporated into the proposal where feasible ensuring bushfire protection measures are also met. Details shown on updated Civil plans, Architectural plans, Landscape plans.
Car park design impacts	Whilst it is acknowledged the public carparking will result in some impacts such as loss of amenity, increased traffic, and the introduction of additional infrastructure into the golf course catchment, there are benefits for the community i.e. addressing the demand for short-term parking within the village. The provision of on-street parking where public facilities (e.g. golf course, Thredbo River, Riverside Walk, Community Centre) are located will support accessibility and connectivity to services provided at this end of the village. In response to concerns raised (predominately from Riverside Cabin owners) regarding proximity to Thredbo River, amenity impacts to lodges and public safety concerns, the car parking has been re-designed. Relocation behind the Community Centre will provide greater separation and visual screening between Thredbo River and Riverside Cabins. The provision of a dedicated pedestrian path toward the Community Centre

KEY MATTERS	RESPONSE
	and Crackenback Drive, providing a link to the pedestrian bridge via a pedestrian crossing. Directional and wayfinding signage and lighting will also be installed throughout the road corridor to ensure public safety. A qualified Traffic Consultant has been engaged to assess the traffic impact from the Development, refer Traffic Impact Assessment.
Car park design recommendations	The amended car park design has taken into consideration the design comments provided in the public submissions, refer updated Civil plans for details.
Traffic generation	The traffic generation and subsequent impacts in the locality have been assessed by a qualified Traffic Consultant, refer Traffic Impact Assessment. Appropriate traffic calming devices and signage are proposed to manage potential public safety risks associated with the additional traffic generation in the locality. Detailed design will form part of the construction certificate stage.
Development controls / type of development / lot sizes	Thredbo specific controls are outlined in the SEE. Future development of lots will be required to consider the planning controls outlined in the Alpine Region Development Control Plan 2025. A portion of the lot sizes have been reduced. The total lot area has been reduced from 14751m² to 12789m².
Development alternatives	Alternatives to the proposal were considered in Section 3.1.2.3 of the SEE. Further justification for why these options were discounted has been provided in the amended SEE.
Proximity to Thredbo River	Feedback regarding setbacks has been considered in the re-design. Whilst achieving a 50m setback is not achievable for the entire proposal, the road alignment and car parking has been shifted upslope as far as possible from Thredbo River. Under the <i>Water Management Act 2000</i>, development is permitted within 40 m of a watercourse, subject to a Controlled Activity Approval. KT will apply for all relevant approvals prior to construction. The water impact assessment and stormwater management plan have been amended to demonstrate how the proposal has considered the potential impacts to Thredbo River. With the implementation of appropriate controls during detailed design and construction, the impacts are considered acceptable. Refer to updated Civil and Architectural plans.
Stormwater controls	Section 6.2.4.2 of the SEE acknowledges the road and car parks will introduce impervious surfaces that may contribute to nonpoint source water pollution and increased stormwater runoff. The SEE states the new access road is not expected to adversely impact on water quality in the receiving environment given appropriate design controls have been incorporated in the proposal e.g. layback kerb, spoon drains and grated inlets. It goes on to acknowledge that appropriate stormwater controls have been incorporated into the design and that individual lots will require stormwater controls that tie into the network to minimise impacts on the receiving environment. As described in Section 6.3.2.2 of the SEE, the drainage infrastructure will be connected to three stormwater retention devices (e.g. Puraceptors) to treat stormwater prior to discharge to Thredbo River. ELA (2023b) outlined if effective and adequately maintained, the treatment system would mitigate indirect impacts to the river.

KEY MATTERS	RESPONSE
	The purpose of the end point stormwater retention devices is to protect the downstream environment through controlled discharge points. Similar controlled stormwater retention devices are installed at all major discharge points within the resort, such as Valley Terminal, Friday Drive, overnight carpark 2 and 4. These existing devices undergo a strict maintenance schedule carried out by competent technicians. The end of line stormwater retention devices outlined in the proposal would be incorporated into the overarching village maintenance schedule to ensure ongoing functionality. An example of an end of line stormwater retention devices is provided below for context.  Source: Spel Puraceptor Class 1 Operation and Maintenance Manual, 2013 To further demonstrate that appropriate stormwater management controls will be incorporated into the proposal, an updated stormwater management strategy has been prepared taking into consideration feedback received during the public exhibition period and government agency RFIs. The amended design has shifted the access road outside of Thredbo River's riparian corridor. No uncontrolled stormwater release into Thredbo River is proposed, refer details above regarding stormwater retention devices. The purpose of these devices is to treat stormwater (e.g. filtration of hydrocarbons) before release into Thredbo River.
Water quality, impacts to water flows	The proposal has been re-designed to ensure no works are proposed within the inner riparian corridor of any watercourses. The Aquatic and Riparian Assessment has been updated to reflect the revised proposal and impacts to waterfront land. The proposed controls to be incorporated into detailed design and construction will mitigate potential impacts to the river water quality. Refer to response above for further details. Water quality limits for discharge points throughout the resort are conditioned within KT's water licence approvals, and these limits are set out by the NSW Environmental Protection Agency (EPA) to ensure the long-term health of watercourses.
Visual impacts	The start of the access road and car park have been relocated to minimise the visual impacts of the infrastructure to Riverside Cabins, users of the Riverside Walk and open space adjacent to Thredbo River. Section 6.7.1.4 of the SEE has been updated to provide a more comprehensive analysis of the potential impacts to Riverside Cabins and discuss how the design has been amended to minimise and mitigate the potential impacts.

KEY MATTERS	RESPONSE
	The assessment of “minor to moderate” remains the same, as sight lines and visual impacts from the new development vary from Riverside Cabins e.g. some cabins have clear sight lines to the subdivision, and others are partially screened by vegetation, some cabins have direct sight to the car park, some views are partially screen from the tree island and Community Centre. Riparian Zone offset planting is proposed to screen/minimise impacts on Riverside Cabins where possible.
Noise, lighting and air quality impacts	The concerns raised regarding noise and lighting impacts from the access road and car parking were largely received from Riverside Cabin owners. This feedback has been taken into account with the re-design of the entry road and car park location. Vipac (2025) were engaged to assess the noise impacts of the proposal and provide recommendations to minimise, mitigate and manage noise pollution during construction and operation of the Development. Details on proposed lighting is provided with the revised Architectural plans. The lighting has been designed similar to other areas in the village to minimise light spill and impacts in the locality. All lighting will be as per Australian Standards.
Strain on existing infrastructure	Various technical studies have been undertaken to confirm the capacity of existing services in the village to cope with the additional development. Refer to the following documents: • Wastewater Treatment Plant Capacity Assessment • Thredbo Water Supply and Fire Hydrant Operation • Thredbo Sewer Capacity Assessment
Development will impact fire safety measure	KT and GHD have undergone ongoing consultation with RFS and the consent authority to achieve appropriate bush fire safety protection measures for the proposal. Refer to the updated Bushfire report for details.
Impacts to native flora and fauna	The Development has been designed to minimise the amount of native vegetation clearing required to enable the proposal. Where unavoidable impacts are identified, offsets are proposed in accordance with legislative requirements. Refer to the updated Biodiversity Development Assessment Report for details. During vegetation removal and construction, controls will be implemented in accordance with the Site Environmental Management Plan to mitigate potential impacts on native fauna.
Impacts to Riverside Walk and golf course loop track	The first section of the road and car park has been relocated uphill to create greater separation from the start of the Riverside Walk and golf course loop track. The proposal is to retain the existing 9-hole course, not reduce to 6. Whilst the new infrastructure and buildings will result in a loss of amenity within the golf course catchment, guests will still be able to enjoy recreational activities within the locality, including golf and disc golf, but running, walking, snowshoeing, snow play including gentle tobogganing, wildlife viewing, kids play, picnicking etc.

KEY MATTERS	RESPONSE
	The provision for tourist accommodation within the resort is consistent with the aims of the Snowy SAP Master Plan to boost year-round tourism and accommodation options. Details are provided in Section 6.5.2 of the SEE.
Impacts to golf course	Downgrading of the golf course is acknowledged, however the proposal aims to achieve a balance between retaining the existing golf course and providing additional accommodation offerings in the resort to support ongoing tourism.
Impacts to other recreational values	The Snowy Mountain Special Activation Precinct Master Plan Thredbo Village West structure plan identifies the golf course as a key development site for new tourist accommodation (pp.159-160). The Master Plan states the location of future development should align with the relevant structure plan and be focused on land marked 'Development area'. The Development is located entirely within the golf course 'Development area'. The Development has been carefully redesigned to ensure that the 9 hole golf course is retained, and the impacts on recreational and amenity values in the locality are minimised as much as practicable. The start of the access road and car park has been relocated to ensure valuable recreational open space within the golf course catchment is retained, including key areas identified in the submissions including the Thredbo River, the start of the Riverside Walk and the green area between the Community Centre toward the first hole. Refer to the updated civil plans, Architectural plans and Golf course plans for details on the revised proposal.