

EXHIBITION – EXH-13073

SUB-14745

Please provide your view on the application

I object to it

submission

It would be such a same to ruin the existing golf course that provides so much community pleasure with golf, disc golf and walking.

We love coming to Thredbo because of the summer activities and this is a key asset that doesn't need to be subdivided to provide more housing.

Extended Lake Crackenback or Woodridge ends would be my suggestion.

SUB-14746

Please provide your view on the application

I object to it

submission

It would be such a same to ruin the existing golf course that provides so much community pleasure with golf, disc golf and walking.

We love coming to Thredbo because of the summer activities and this is a key asset that doesn't need to be subdivided to provide more housing.

Extended Lake Crackenback or Woodridge ends would be my suggestion.

SUB-14749

Please provide your view on the application

I object to it

submission

I wish to formally object to the proposed subdivision of the Thredbo Golf Course.

The golf course represents one of the last significant open green spaces in the village and plays a vital role in maintaining Thredbo's distinctive character and atmosphere. Its open landscape contributes to the sense of space, connection to nature, and village scale that has long defined Thredbo and differentiated it from dense urban environments.

The ongoing expansion of development and corresponding loss of green space is detrimental to the relaxed, low-key and peaceful environment that attracts visitors and residents seeking respite from increasingly crowded cities. Further subdivision will erode the natural surroundings that underpin Thredbo's appeal, replacing openness and landscape with built form and urban intensity.

Once lost, this green space cannot be replaced. Preserving the golf course in its current form is essential to protecting the village atmosphere, environmental values, and long-term sustainability of Thredbo as a mountain destination.

For these reasons, I strongly object to the proposed subdivision and urge that the golf course be retained as open green space for the benefit of the community and future generations.

SUB-14750

Please provide your view on the application

I object to it

submission

I object to the redevelopment of the golf course.

SUB-14753

Please provide your view on the application

I object to it

submission

This is a key activity for summer trips which I attend every year

SUB-14755

Please provide your view on the application

I object to it

submission

I strongly object to the proposed residential development of part of Thredbo Golf Course. The intrusion of road access, services and residential buildings will significantly reduce the golf course amenities.

This golf course is a defining feature of Thredbo, the highest altitude golf course in Australia, and provides both active and passive recreational opportunities in all seasons - walking, bird watching, golf and snowshoeing in winter.

As a lodge owner and frequent visitor , both summer and winter, to Thredbo since 1962 I do not wish to see this unique feature of Thredbo diminished in any way.

██████████. Member of Schlupfwinkel Ski Club, Diggings Terrace Thredbo.

SUB-14757

Please provide your view on the application

I object to it

submission

I have been coming to Thredbo for over 60 years and every summer enjoy the social activity of playing golf. The natural surroundings, playing in the bush makes this space unique. After playing on this course as a young man I am now able to enjoy playing with my grandchildren. I very much hope that this development does not go ahead. - [REDACTED]

SUB-14758

Please provide your view on the application

I object to it

submission

Reducing the golf course to make way for further subdivision and development of Thredbo will affect the unique nature of Thredbo as an alpine community village. The open space and connection to the natural surroundings makes this a unique site, that once lost, can never be resumed. The present development next to the golf course already gives an idea about the look and feel of a new development, large and slick but lifeless because of short term rentals, time share, and part-time residents. Ironically, the charm and special atmosphere of the village that the development wishes to capture will be lost by its very construction.

SUB-14797

Please provide your view on the application

I am just providing comments

submission

I'm seeing how submissions work. Ignore this submission

SUB-14798

Please provide your view on the application

I am just providing comments

submission

test test test

SUB-14815

Please provide your view on the application

I object to it

submission

I would like to object to the proposed DA relating to proposed development on the Thredbo golf course on the basis of loss of community land for local amenity.

Thredbo is a location made up of leasehold property via a head lease and a number of sub-leases. The sub-lessee's are there for the amenity that greater Thredbo provides, namely the skiing in the winter and a variety of summer activities in the non winter months. A big part of that is golf.

Whilst not the greatest golf course in NSW, it is one of the drawcards for being in Thredbo in summer. It is very well utilised and part of what the sub-lessees pay for as part of the Thredbo experience.

More accommodation at Thredbo should be put on hold until the rest of the Thredbo amenities catch up. You can't have day trippers turned around when they have purchased tickets, and lodge owners told they can't proceed because there is no more parking even though they have on-site parking.

This development will only create further disbalance in the whole Thredbo offering and is out of touch with what existing sub-leasees of property are paying for under their existing agreements.

SUB-14817

Please provide your view on the application

I object to it

submission

We want a golf course

SUB-14818

Please provide your view on the application

I object to it

submission

I want to be able to play golf when i holiday at thredbo

SUB-14831

Please provide your view on the application

I object to it

submission

Please find attached my submission opposing this development application.

Mr Mark Brown
Principal Planning Officer
Alpine Resorts Team
Regional Assessments, Regions & Key Sites
Department of Planning and Environment
alpineresorts@planning.nsw.gov.au

15 January 2026

Re: Golf Course Subdivision, Thredbo Village, DA 23/13081

Dear Mark

Thank you for alerting me to the Amended Development Application (DA) for the Thredbo Golf Course subdivision.

I remain opposed to this development. I see no need or legitimate justification for the subdivision of this special scenic open-treed green quiet space. I genuinely believe it is not in the best interests of the Thredbo Resort, the Thredbo Community (village) or the Snowy Monaro Region to allow an irreversible development on Australia's highest golf course. The project should be abandoned.

A) Key points of opposition:

Regarding my original submission (4 November 2023), all previous comments remain valid.

My opposition is:

1. Personal:- I jog or walk on or around the golf course several times a week outside of winter and walk or snowshoe at random times during winter. The peaceful, gentle green or snow-covered undulating terrain, the sound of the Thredbo River, the mature stands of trees, woodland remnants and surrounding bushland, and the variety of birds I invariably see and hear are meditative and therapeutic.
2. Guest experience related:-
 - a. guests to our business have on numerous occasions remarked about the interaction with mountain bikes in Thredbo and along the Thredbo Valley Track and the impact of the trails on the main mountain; they appreciate the golf course and Riverside Walk.
 - b. golf is one 'passive' quiet activity in a village increasingly dominated by mountain bikes, large SUVs and day trip groups.
3. Community-related:- the golf course area is special for long-term residents, businesses and staff of Thredbo i.e. many hold a sentimental attachment to the area.
4. Village-resort related:- this development negatively impacts on the environment, narrows and reduces the quality of recreational offerings in Thredbo, and changes the character of the village environs irreversibly. I believe it makes Thredbo a less attractive all year-round destination.

5. Region-state-nation related:- this is Australia's highest golf course in a truly unique setting and the loss of its current design and character via a real-estate development cannot be reversed.

I note the revisions made to the proposal such as further setback from the river and relocation of the access road and car parking, however I believe the revisions made to the proposal are inadequate and 'miss the point'.

I consider that the development, if approved, would be at significant detriment to the Thredbo resort experience as it will result in a loss of village amenity and character. It narrows Thredbo's tourism offerings and quality experiences and will be a major degradation of the existing recreational / natural asset / attraction / values of Thredbo. That is, it will further restrict passive recreational opportunities and experiences and the ability for visitors to appreciate wildlife and quiet open space.

It is in contradiction to / undermines the desired expansion of year-round (out of winter) recreational activities in the village and region. It damages one important recreational asset in Thredbo and one unique asset in the region and further afield. One can argue that as Australia's highest golf course, it should be considered special and nurtured and maintained, no matter whether it makes a profit or not. The custodians of this space should not be proposing to damage it.

As well as the environmental values of the Alpine Precinct, the development will compromise heritage and social values. It does not respect the value of the golf course in the context of Thredbo's establishment history or the importance of the space to the community.

The Thredbo Lease Area is increasingly filled with infrastructure including mountain bike trails (which carve up and scar the mountain and impact on walkers everywhere), and traffic. The village green is a high activity area with pump track, skate park, BBQ and tennis courts. After the Alpine Coaster has been added to the central village mix of activities, a zip-line is being talked about.

Thredbo's attraction as a mountain retreat, a place of respite, a place for quieter passive activities such as walking, nature appreciation, fishing, jogging / running, golf, photography, river swimming and being in a clean air peaceful environment is further degraded / threatened by this golf course development.

B) Public notification and awareness of the proposal:

Why is this development not advertised clearly on-site through the placement of a notice at the entrance to the golf course, so that all visitors over the exhibition period at a minimum are informed of the proposal and are able to follow up with a submission? Is it not a requirement that the consent authority or proponent / leaseholder exhibit notice of the DA on the land to which the DA relates?

The Minister for Planning and Public Spaces as the consent authority should be concerned that the public is inadequately informed of this development proposal.

C) Proponent justification for the development - the Snowy Mountains Special Activation Precinct Draft Master Plan:

- It is very hard to understand why the Snowy Mountains Special Activation Precinct (SM SAP) marked the golf course as a 'Development Area.' Was the SM SAP adopting / accepting the label allocated in the draft Thredbo Master Plan (DJRD 2019) or Thredbo Village Zoning Plan? If so, how was the golf course ever allowed to be designated as a development area for new tourist accommodation? I do not think the decision was in the public, community / village or region's interest.

- The decision is evidently in the interest of the proponent (Thredbo head lessee) who has used the SM SAP as its justification / legitimacy for the subdivision, e.g.:

'The do-nothing scenario is not considered a credible option for delivering the planned land use outcomes for the site as identified in the Snowy Mountains Special Activation Precinct Master Plan...,'¹ and

'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...The Master Plan states the location of future development should...be focused on land marked 'Development area'. The Development is located entirely within the golf course 'Development area.'²

- The proponent justifies the development on visitor pressure and economic grounds, for example:

'The do-nothing scenario would deny [the] opportunity for a number of visitors to experience on-mountain accommodation and continue to put daily pressure on the Alpine Way transport corridor,'³ and

'The new lots and additional 186 beds will help address the peak period accommodation shortages experienced in Thredbo and the broader Snowy Mountains Region.'⁴

- My response:

1. 'Denying' the opportunity for a number of visitors to experience on-mountain accommodation is quite a statement for a developer to make.
2. I think it is very hard to determine the impact the development would have on the Alpine Way traffic volumes over the entire year given that Thredbo has received a huge increase in day visitors in recent years, both winter and summer, and many of these may not be willing to fork out the amounts required to stay in what will undoubtedly be 'high end' accommodation in peak periods.
3. Overnight stays in Thredbo were down in the last 12 months across the board as far as I am aware, including in traditional peak periods in winter and summer. This

¹ Kosciuszko Thredbo Pty Ltd 2025. *Statement of Environmental Effects Thredbo Golf Course Subdivision November, p.15*

² Kosciuszko Thredbo Pty Ltd 2025. *Thredbo Golf Course Subdivision – Applicant response to public submissions 17 November, p.9.*

³ Kosciuszko Thredbo Pty Ltd 2025. *Statement of Environmental Effects Thredbo Golf Course Subdivision November, p.15.*

⁴ *Ibid, p.100.*

continues. The Australian and global economic, climatic and security environment are increasingly uncertain and precarious.

4. There is existing accommodation in the village for sale including one of Thredbo's first lodges, Candlelight. As with Black Bear next door, it is highly probable that when sold the future of Candlelight will be a 'knock down and redevelop as apartments' proposition, despite its historical value.
5. The proponent has, in its Statement of Environmental Effects (SEE), assessed alternative options within the Thredbo Lease Area, however the locations were never credible alternatives (next to the tip/sewage treatment works; on Friday Flat day carpark) and seem to have been a 'tick the box' exercise. Of course, the golf course is preferable as it is a beautiful location!
6. Why should such a valued (non-monetary) open space be damaged to satisfy a 'need' for more accommodation in the National Park? If there are no other options in the truly built-up areas of the Thredbo Lease Area then maybe Thredbo is 'full' and only redevelopment of existing properties (as with Black Bear), and true 'infill' within the existing main accommodation areas (central village, Crackenback Ridge, Woodridge), can take place from henceforth? I note that the proponent is also pursuing its Development Application for Lot 768, 5 Diggings Terrace, the village fire break (also problematic).
7. Resorts and popular tourist destinations have frequently overdeveloped and killed the amenity and attractions that originally drew people to them. This proposal takes Thredbo further along the path in this direction.

D) Use of 'loaded' terminology:

- The proponent states that 'The development is considered "in fill" in that it is within existing disturbed / altered areas of Thredbo resort and is not development into undisturbed areas of the resort.'⁵
- My response:
 1. I find this description of the development as unfortunate and inappropriate. Is the subdivision on a prime, scenic, green recreational and nature asset and an example of what is meant by "in fill"?!
 2. Use of the terms 'disturbed / altered' are loaded. The disturbed areas phrase is used elsewhere in the proponent's documentation e.g. 'disturbed fairways of the golf course'. This terminology propels the argument that because the golf course is a modified, non-pristine sub-alpine environment (original woodlands, scrublands removed in part or modified) it is not a legitimate or valued land use of any merit and is thus able to be used for real estate development.
 3. The golf course and surrounds comprise a beautiful 'natural' environment compared to much more highly 'disturbed' parts of the Thredbo Lease Area.

⁵ Kosciuszko Thredbo Pty Ltd 2025. SM SAP Master Plan Considerations – Thredbo Golf Course Subdivision, p.2.

4. Clearly a golf course is a modified environment, however Thredbo's golf course does have elements of three plant communities in as well as surrounding it: Alpine Snow Gum – Snow Gum shrubby woodland; Black Sallee – Snow Gum low woodlands; Montane wet heath and bog; and 'a number of threatened fauna species are known to occur in adjoining habitats and / or have the potential to occur within the development site,' these being the Flame Robin, Gang-gang Cockatoo, Olive Whistler and Broad-toothed Rat.⁶
5. As previously stated, the entirety of the golf course and surrounds provides the opportunity for nature appreciation, with a number of fauna and avian species to encounter and woodland and heath remnants to walk through.

E) Value placed on the Golf Course and surrounding area:

- The statement that the Thredbo golf course is 'by and large, considered a fun and challenging golf course in a unique environment' is a positive one, however the statement continues with '[it] is an "extra" activity for a Thredbo stay and not an attraction in its own right.'⁷
- My response:
 1. This is an assertion and form of labelling that may stem from the fact that the golf course doesn't make money, so the proponent is downplaying its value, while evidently a sub-division will reap significant initial and ongoing income, as stated in the economic justifications for the development: 'The expansion of Thredbo's accommodation will support the year-round recreational and tourism opportunities within the resort,' and 'The development will result in the generation of rental and associated resort based income from 186 additional beds.'⁸
 2. How does the expansion of this accommodation support year-round recreational and tourism opportunities rather than damage and shrink them? It seems the argument is that the sale and the ongoing rental income will be used to fund new or upgrade existing recreational and tourism opportunities.
 3. I do not accept these economic justifications. It is a long-standing concern that the proponent and / or its parent company have not been investing adequately in the resort. Ignoring the continued expansion of MTB trails, I acknowledge the proponent has invested in new attractions (Merritts gondola and Alpine Coaster) as well as critical services such as sewerage work upgrades, snow making, Friday Flat parking, but there are many other 'key essentials' being left to deteriorate. For example: inadequate lifts, ageing leisure centre and tennis courts; ageing Thredbo Alpine Hotel and Valley Terminal; limited opening hours and limited offering food outlets; neglected walking trails; dangerous roads and paving; inadequate street lighting; old village bus fleet (diesel/petrol); minimal revegetation and landscaping etc.

⁶ Kosciuszko Thredbo Pty Ltd 2025. *Proposed Golf Course Development, Thredbo Alpine Resort Biodiversity Development Assessment Report*, p.ii

⁷ Kosciuszko Thredbo Pty Ltd 2025. *Statement of Environmental Effects Thredbo Golf Course Subdivision November*, p.46.

⁸ Ibid, p.47.

4. Having to sacrifice the golf course area to direct money to other areas of the resort is not a legitimate economic justification; if the parent company wanted to it could properly invest in / support the resort and improve the quality of existing recreational and tourism offerings and services. This would include investing in staff accommodation in the Thredbo Lease Area, one 'key essential' to enable a fully-functioning, quality-service, all-year round resort.
5. Golf is not an 'extra' activity, it is one of a variety of recreational activities in Thredbo that visitors / guests can participate in. There is a cohort of guests who do bring their golf clubs to enjoy a round or more during their stay.
6. The proponent or the Thredbo Chamber of Commerce (Tourism Thredbo) both appear to have done little to promote the golf course to golfers, which could generate more interest in and use of and possible income for the proponent and Thredbo businesses. For example, Thredbo could join forces with other golf clubs in the Snowy Mountains to hold an annual regional competition.
7. The golf course is, as mentioned earlier, not just about golfers. Thredbo is shifting to more high-octane adrenaline-filled higher environmental- and amenity-impact ones. Thredbo needs to maintain the variety of offerings including golf, tennis, pedestrian only walking trails, quiet riverside places, open green spaces, nature appreciation opportunities or places for snow play.
8. The space provides a place where visitors and locals can escape vehicles, noise, crowds and mountain bikes and dust (the mountain bike usage on the Riverside Walk is less than other areas of the resort and I have always thought that this walk should be restricted to pedestrians only), which is increasingly difficult in the rest of the resort area. It provides the less fit or less adventurous walkers with a safe and gentle space for walking and being outdoors and experiencing elements of the alpine environment.
9. The role the golf course and surrounds play in the overall Thredbo resort / Thredbo Lease Area is an important one; it is a 'buffer zone' between the village and the woodlands at the western edge of the village, one that doesn't really exist in the same way on the eastern edge (though Friday flat lakes provide some amenity).
10. The area provides habitat and the chance to see wildlife including platypus, echidna, wombats, wallabies, black cockatoos, gang-gangs, crimson rosella, kookaburras, ducks, wattle birds, currawongs, magpies...

- The proponent states that: the design of the subdivision 'ensures public open space remains accessible, protected and enhanced,' that 'The redesigned course will maintain the unique environment and challenging course,' and the development is '...integrated with year-round recreational activities within the golf course catchment and surrounds.'⁹

⁹ Kosciuszko Thredbo Pty Ltd 2025. *Statement of Environmental Effects Thredbo Golf Course Subdivision November, pp.40, 46 & 3.*

- It also says that ‘while 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...’¹⁰
- My response:
 1. I disagree with these assertions and arguments. The full value of the space is not understood or appreciated, or is being ignored by, the proponent. The development will irretrievably degrade the quality of this area, and the recreational experiences visitors and locals appreciate and further restricts / limits the offerings in Thredbo year-round.
 2. Having 18 buildings and a road ‘smack bang’ in the middle of the golf course is restricting and damaging the quality / amenity / character / nature / quiet of the green open - treed space of the entire golf course and riverside for all who frequent this area.
 3. The area provides peace and quiet and limited activity and infrastructure. No vehicles, few bikes. It is not just the perimeter of the course that is appreciated by walkers; it is the entire space.
 4. How can it be that the ‘public open space remains...protected and enhanced’ and at the same time there will be a ‘loss of amenity’?
 5. The unique environment and challenging course are not maintained, they are damaged.
 6. The relocation of the road and carpark to just uphill of the Thredbo Community Centre still negatively impacts on the Community Centre including its outdoor BBQ area.
 7. While the proponent acknowledges the significance of ‘...several social and recreational values for the community’ of the golf course precinct,¹¹ it does not accept the proposed subdivision will have a significant impact. The golf course precinct also has physical and mental health values for the community not given sufficient weight by the proponent.
- The proponent argues that the development ‘provides the opportunity for people to interact with nature in their immediate surroundings...’¹²
 1. This is a somewhat strange argument given that the development will impinge on all other visitors / guests to the village, and locals and staff who value the golf course and its qualities / amenity / beauty whether as a course or an open-treed green quiet spacious space etc.

¹⁰ Kosciuszko Thredbo Pty Ltd 2025. *Thredbo Golf Course Subdivision – Applicant response to public submissions 17 November, p.8.*

¹¹ Kosciuszko Thredbo Pty Ltd 2025. *Statement of Environmental Effects Thredbo Golf Course Subdivision November, p.46.*

¹² Kosciuszko Thredbo Pty Ltd 2025. *Statement of Environmental Effects Thredbo Golf Course Subdivision November, p.39.*

F) Use of offsets to allow continued development:

- The Biodiversity Development Assessment Report (BDAR) commissioned by the proponent assesses that the development will not have any serious and irreversible impacts on flora and fauna. However, a total of 2.29 ha vegetation and fauna habitats will be unavoidably impacted, which includes the habitat of one threatened species (Broad-toothed Rat). The BDAR calculates 54 ecosystem credits and 1 species credit must be paid by the proponent to 'offset' these impacts.¹³ A further zone around the development will be impacted to some degree.
- My response:
 1. I am opposed to the use of offsets. They have been strongly criticised and indeed discredited at both the NSW and national levels as they have been 'facilitating loss' - allowing continued piecemeal biodiversity and habitat destruction and species extinction. They have been used commonly as the 'easy way' to continue to allow development. They are the norm rather than being used as a last resort.
 2. While NSW enacted changes to reform and tighten up its biodiversity offset scheme at the end of 2024, I understand it is still a work in progress. Similarly, the recently secured legislative reforms to the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*, including changes to the offset scheme, are yet to be implemented.
 3. So, what exactly is the proponent going to be paying for? Is this offset 'like for like'? Where will the other 2.29 ha be protected, who will manage, administer, monitor? Is this simply undertaking not to destroy another bit of like habitat in the Thredbo Lease Area? I could not find these details; if they are not provided then they should be.
 4. Even if the offsets are of the highest integrity and quality, they don't help address the loss of the unique Thredbo golf course area and all it offers and provides. The impact for nature and visitors is far greater than the 2.29 ha directly and irreversibly impacted.

Sincerely

[Redacted]

[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]
[Redacted]

¹³ Kosciuszko Thredbo Pty Ltd 2025. *Proposed Golf Course Development, Thredbo Alpine Resort, Biodiversity Development Assessment Report*, 26 November.

SUB-14833

Please provide your view on the application

I object to it

submission

It will be a shame to lose the most picturesque hole in the course, to replace it with a short hole in amongst residential housing and roads.

As with most developments once we lose the asset, it can never be replaced

A more viable proposition would be the development above the existing Woodridge area above Lovers Leap ski run, giving the lots a ski in ski out option and not removing any existing amenities Thredbo resort currently has.

SUB-14836

Please provide your view on the application

I object to it

submission

See attached document

Submission re DA 23/13081 Golf Course Subdivision Thredbo

We are the co-owners of Riverside Cabin 22 and spend extended periods of time in Thredbo during both summer and winter. We previously objected to this development. We note the amendments to the DA regarding the siting of the car park and provision of a pedestrian crossing and footpaths. These amendments do not satisfy our concerns. We also note the objections to this development raised during the consultation on the Snowy Special Activation Precinct Master Plan.

We continue to object to this development on the following grounds.

1. The DA does not take into account the impacts of climate change now locked in as emissions continue to rise.
2. The development will adversely impact the environment, particularly the Thredbo River.
3. The development will not achieve its stated goal of increasing tourist accommodation in the resort.
4. The development will create extra traffic congestion through the central and busiest part of the village.

The Development is not in the public interest. Although acknowledging the concerns around public and environmental values, the DA discounts these as being of little importance.

The Development does not meet Ecologically Sustainable Development (ESD) goals.

The Development will have an adverse impact on the National Heritage Values of the Australian Alps National Parks and Reserves.

The DA does not take into account the impacts of climate change.

This development is unnecessary because of the predicted decline in snow levels (POW report 2025 <https://protectourwinters.org.au/our-changing-snowscapes/>) as climate change escalates. This is already being seen as seasons shorten and snow contracts to higher elevations. Green season users prefer a base in Jindabyne which gives access to a more diverse range of activities and food options and is more cost effective.

Without snow, the alpine resorts lose their unique selling point and need to compete with established tourism destinations on the coast, in national parks, and in towns and cities (POW 2025).

As Australia warms, the Alps will provide a haven of cool temperatures in summer. The proposed changes to the golf course will reduce the year round appeal of Thredbo by reducing access to green season activities when it should be encouraging them.

The development will adversely impact the environment, particularly the Thredbo River.

The current golf course provides a buffer between the urban development of the village and the forest of the National Park.

The proposed tree removal and reduction in vegetation is far greater than any replacement.

The Biodiversity Development Assessment Report (BDAR) concludes there is minimal impact on plant communities and threatened species, however it does not assess the subjective impact of removal of vegetation on environmental and recreational values.

“Visual impacts may also affect recreational users (i.e. walkers, bike riders and golfers) through the loss of landscape character of the locality / golf course which may impact on the sense of place (Statement of Environmental Effects pg 82).”

These impacts are discounted throughout the revised DA.

The Bushfire Assessment Report requires substantial reduction in current vegetation outside the development including areas currently designated ‘Forest’ in order to meet RFS requirements and ongoing maintenance as remnant vegetation patches. This is significantly different to the way these areas are currently managed. At present these areas are designated ‘Forest’ with substantial tree cover and dense understory of a variety of shrubs with greater than 20% understorey vegetation cover.

Forest abuts Lots 1-6. Lot 10 is directly connected to Forest (pg 11 of Bushfire Assessment Report) on the western end of the development (maximum bushfire risk). The report ignores a corridor of Forest directly in contact with Lots 5-8 and the larger patch of Forest to the north of the development. The report underplays the possibility of canopy fire spreading east along this corridor. In addition many of the gaps between the greens and Forest are small, a matter of a few metres. Bushfire advice obtained by the Riverside Association shows that fire from the west is the most likely scenario for bushfire attack.

The development will lead to further extraction of water from the Thredbo River potentially compromising its flow in dry periods. This water is needed to maintain the health of the river downstream from Thredbo. It may be needed in future years for snow making as snow falls continue to decline. The amount of water required for snow making is predicted to increase even by 2030 (POW 2025), only 4 years away.

The proposal includes 3 new stormwater influxes into the Thredbo river, all above current swimming areas. This will cause further damage to riparian vegetation and degrade the swimming experience.

The proposed development will increase the pressure on water and sewage infrastructure that is already getting close to its capacity. These services are already reaching their limits as noted in the technical reports.

There will be further removal of the outer riparian zone vegetation of the Thredbo River up to the inner riparian zone (see Fig 4 pg 19 in Biodiversity Development Assessment Report).

This will further degrade the outer and inner riparian zone which has become golf grass from the Crackenback Drive bridge to the mature trees past the Riverside bridge.

The development will not achieve its stated goal of increasing tourist accommodation in the resort.

The proposal will not result in additional on-mountain accommodation as the lots are likely to be taken up by high wealth individuals and will be mostly left vacant except for one week per year even during the ski season. They will not be added to the rental pool. For example the recently built complex of units off Thyne Reid Drive were not fully utilised at any point in the 2025 winter season. Many individual properties in the Crackenback precinct are empty through the majority of the ski season and during the rest of the year. After a post covid uptick, real estate prices in Thredbo have slumped. There are many properties within Thredbo that are not selling.

There is also a proposed new development at 5 Diggings Terrace that will provide high end accommodation and soak up demand.

The golf course development will be another millionaires row. Although KT are focusing on a high end market during the ski season, this is becoming less reliable as the snow season contracts due to climate change. Other users are not prepared to pay top shelf prices for real estate in the alpine area and prefer to buy in Jindabyne where there are more services (see above).

The development will create extra traffic congestion through the central and busiest part of the village.

The development goes against the principle of co-locating inbound transport at the Friday Flat end of the village. The development will create a significant increase in traffic flowing through the already congested area around the single point of access to the Kosciusko Chairlift, Snowgums Chairlift, Merritts Gondola, Alpine Coaster and village amenities, bus stops and the information centre. With a new carpark past the Community Centre vehicles looking for parking will traverse up and down past this pinch point posing danger to pedestrians and cyclists moving between bus stops, short stay carparks, the information centre and the chair lifts. This area is particularly congested and chaotic in both summer and winter. Pedestrians spill off the footpaths onto the road, this is particularly problematic in winter with snow banks built up on

each side of the road through snow clearing activities. Bikes go their own way across footpaths and the road. This has not been adequately considered in the traffic impact assessment. At present traffic subsides past the turnaround outside the Thredbo Hotel as beyond it there is limited public parking.

The configuration of the parking area means that vehicles leaving are likely to block access to the subdivision when reversing into or out of the upper carpark bays. If the carpark is full vehicles will continue to the first roundabout of the subdivision. This is a significant increase in traffic flow through what has been a relatively undisturbed area. It will create noise and congestion for both the subdivision and adjacent properties, including Crackenback and Riverside. If more public parking is required it should be at the Friday Flat end of the village.

There is only one access point for the development. This is a problem for emergency and bushfire management and goes against planning recommendations. The proposed mitigations are inadequate.

Conclusion

This development is not forward looking, it does not support the area's natural and cultural values. It is not consistent with the desired future character of Thredbo. It would not serve future generations well if this development goes ahead. Its short term focus ignores the reality of a changing climate and the importance of the environmental and recreational values of this unique alpine area to all Australians.



SUB-14838

Please provide your view on the application

I object to it

submission

The current golf course in Thredbo is very popular with golfers, walkers and a lot of wildlife visit there. It is too much to have another 18 properties in that area.

SUB-14854

Please provide your view on the application

I object to it

submission

This is another example of the results of over poulation and uncontrolled immigration requiring more and more native lands to be destroyed for more and more buildings.

I am from Matong Road Numbla Vale, NSW 2628 and skiid often at Thredbo which was an excellent resort. The main problem with this kind of development is the inadequate infrastructure to sustain it.

SUB-14907

Please provide your view on the application

I object to it

submission

The Thredbo golf course is the last place of quietude and serenity in the village. With the multitude of hotels resorts, pubs, bars, cafes bike enthusiasts that are ever present and creative a vibrant culture to the village, the human heart needs at least one place to find a tranquil place to find peace. The Thredbo golf course is beautiful place to relax and walk and to enjoy the simplicity of nature. I'm sure latter generations will thanks us for not depriving them of this gift.

Yours sincerely,

[REDACTED]

SUB-14929

Please provide your view on the application

I object to it

submission

Please refer to attached submission

Development Application – Thredbo Golf Course: Objection

Premises: Lot 876 DP 1243112 and Lot 500 DP 1118419, Thredbo Golf Course, Thredbo Village, Kosciuszko National Park

Proposal: Subdivision and reconfiguration of golf course and associated works

Application Number: DA 23/13081

Planning Portal Number: PAN-366203

Development Type: Nominated Integrated Development / Integrated Development (not designated development)

Reportable Political Donations I have made no reportable donations within the last two years

OBJECTION AND COMMENT ON AMENDED APPLICATION

Thank you for providing the amended application from the applicant.

These amendments are a significant improvement on the previous submission.

However, it still does not make sense to build a long road to put **people, property, and firefighters in the teeth of a fire raging up the Thredbo Valley** from the West when there is a **viable alternative of developing** the existing **9th Fairway**.

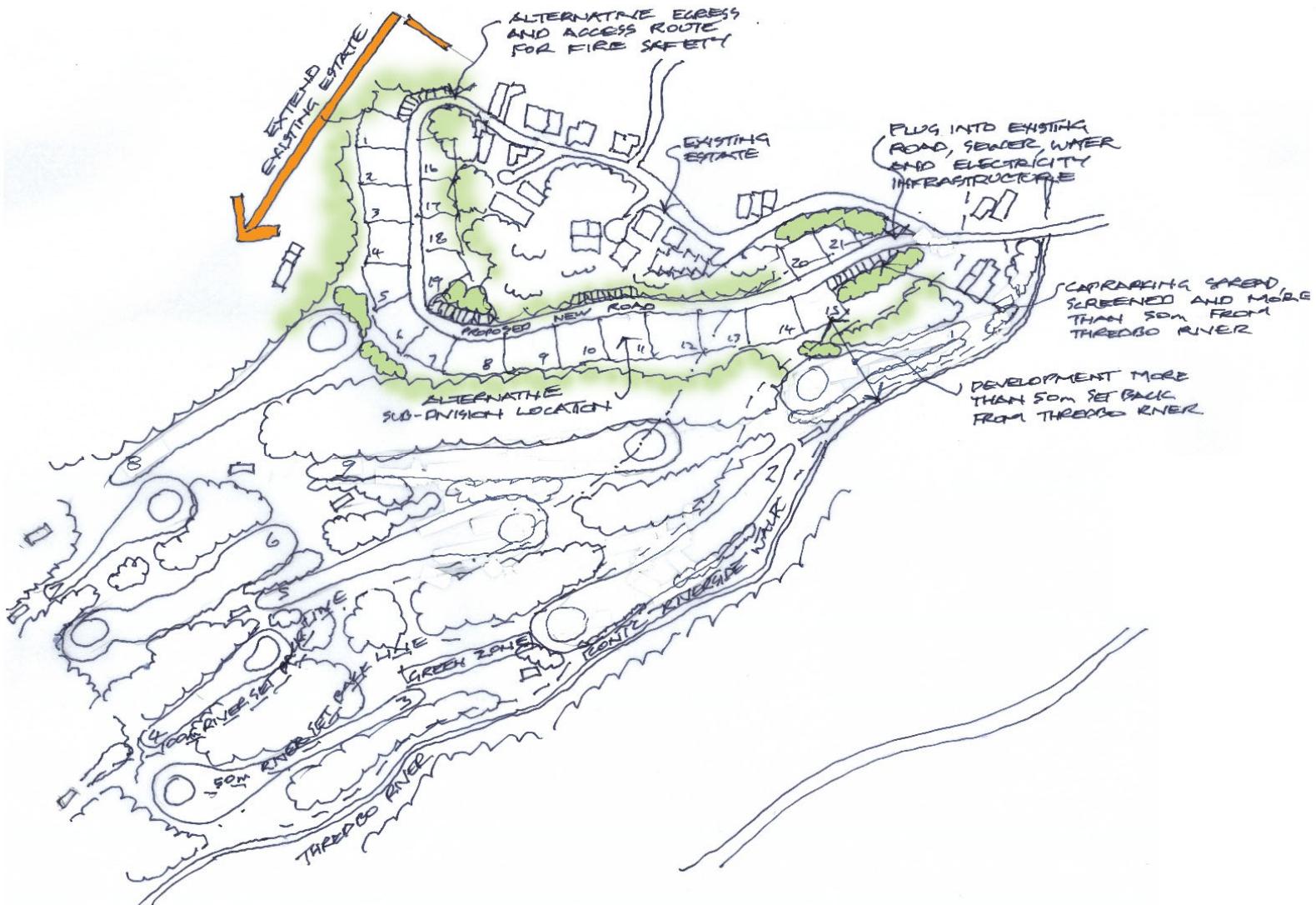
Developing the Thredbo Golf Course subdivision up the 9th fairway delivers the following benefits:

- **It would be safer for people, property, and firefighters.**
 - The golf course would be retained as a fire break to the new residences (and the village as a whole)
 - There would be two road access points to assist escape and firefighting
 - It would be closer to existing firefighting infrastructure such as attack hydrants
- **It would be cheaper**
 - Less road would be necessary
 - The development can plug into the existing sewer, electricity and communications infrastructure
 - It would affectively be an extension to the existing Cracbenback estate
- **It would be more sustainable**
 - Less impact on the Thredbo River and natural environment
 - Less use of resources to build and maintain
 - Use of existing infrastructure – not building new
- **Keep the development the development and the golf course the golf course**
 - People playing golf would be able to continue to play on a separate picturesque bush mountain course – part of the unique Thredbo attraction
 - People playing golf would not have to cross the road and mix it with houses
 - The residences would not be exposed to stray golf balls and people playing golf around them

- **Closer to lifts and restaurants**

- Development of the 9th Fairway would enable people to be closer to lifts, shops and restaurants – more convenient and encourage them to eat out
- The bus route would be a simple add on to the existing and be circular – not up and down a road

Please see below a sketch plan of a proposal subdivision development of the existing 9th Fairway of the Thredbo golf course including how the balance of the golf course could be reconfigured to achieve a 9 hole golf course separate from the residential subdivision:



Developing the 9th Fairway rather than running a long road along the river to a distant subdivision would be safer, cheaper, more sustainable, more convenient and separate the development from the golf course experience.

This is a win-win solution, and we would urge consideration by the applicant and the planning approval authorities.

Regards,



SUB-14930

Please provide your view on the application

I am just providing comments

submission

Please refer to attached submission

Development Application – Thredbo Golf Course: Objection

Premises: Lot 876 DP 1243112 and Lot 500 DP 1118419, Thredbo Golf Course, Thredbo Village, Kosciuszko National Park

Proposal: Subdivision and reconfiguration of golf course and associated works

Application Number: DA 23/13081

Planning Portal Number: PAN-366203

Development Type: Nominated Integrated Development / Integrated Development (not designated development)

Reportable Political Donations **I have made no reportable donations within the last two years**

COMMENT OBJECTION AND COMMENT ON AMENDED APPLICATION

The amended design and documents are a significant improvement in the initial submission.

Primarily the development including the subdivision lots, access road and associated works is now located outside the Thredbo River Riparian zone. This reduces the impact on the environment, leaves the river freer to continue to function as a riverside nature space for visitors and has less impact on the Riverside Cabins.

We would however, respectfully request three adjustments.

1. More screen planting to the ‘elbow’ in the road and carpark
2. A sign that says “no carparking beyond this point” at the end of the proposed new carpark
3. Low level bollard lighting rather than high level street lighting

More screen planting to the ‘elbow’ in the road and carpark

Additional screen planting at the ‘elbow’ of the access road – the road area closest to the Thredbo River – would reduce the visual impact of the road on the river riparian zone and nature space for visitors and reduce the impact on Riverside cabins.

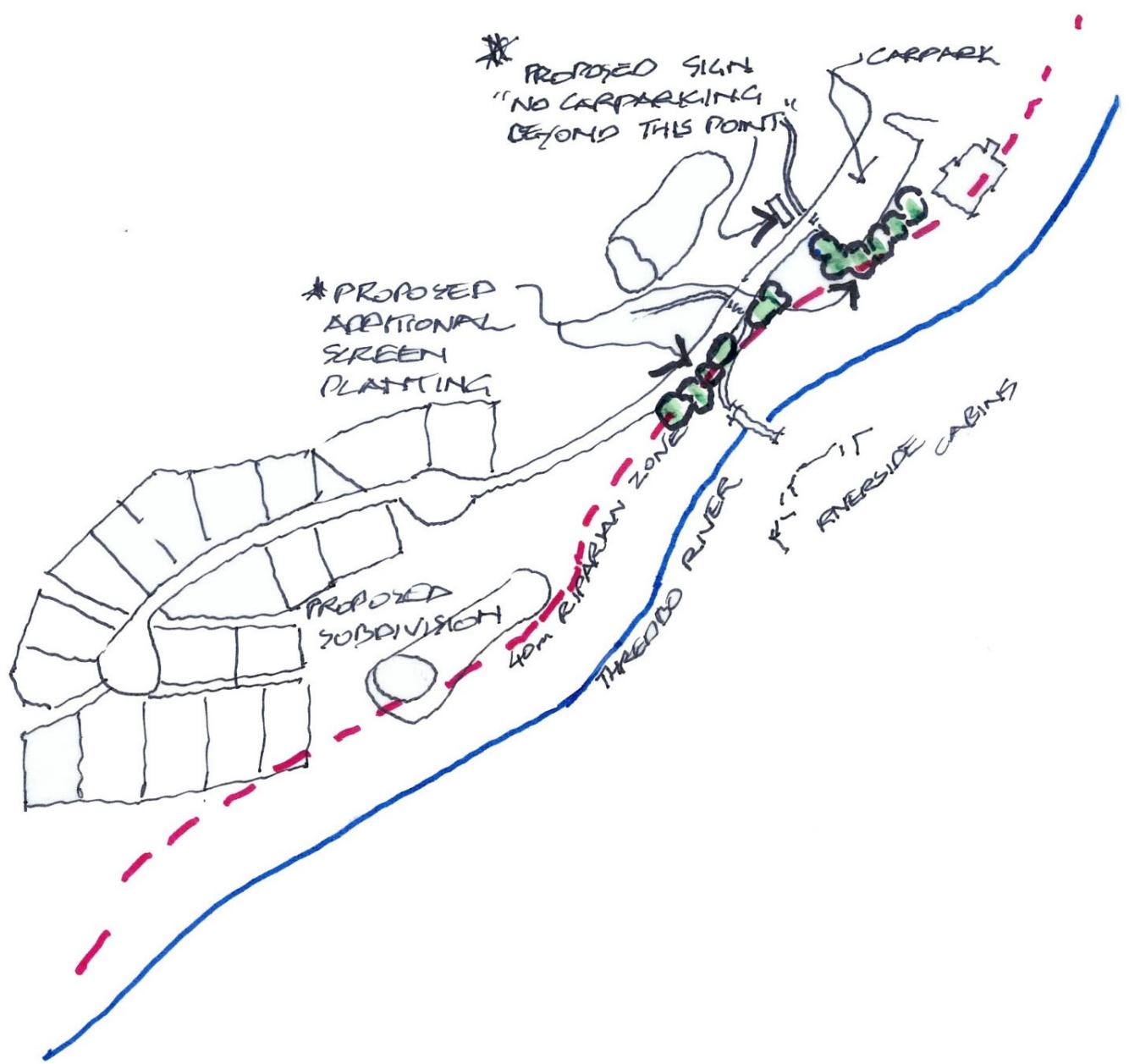
Whilst we maintain that carparking should be limited to the car parking at Friday Flat to reduce the number of cars in the village as well as increase pedestrian safety in both winter sports and summer bike-riding seasons, additional screen planting to the edge of the carpark facing the Thredbo River would at least reduce the visual impact of the carpark on the river riparian zone and riverside nature space for visitors and reduce the impact on Riverside cabins.

A sign that says “no carparking beyond this point” at the end of the proposed new carpark

Carparking should be limited to the car parking at Friday Flat to reduce the number of cars in the village. However, a quality sign similar to the rock wall sign at the entry to the Crackenback Development saying something to the effect of “Golf Course Residential Development. No public Carparking Beyond this Point” would at least help to mitigate the traffic generated by people cruising and hunting for car parks down the subdivision’s new access road.

This sign would help to reduce the impact of the road traffic on the river riparian zone and riverside nature space for visitors and reduce the impact on Riverside Cabins.

Please see below a sketch plan showing the proposed location of additional screen planting and the sign stating "no" car parking beyond this point:



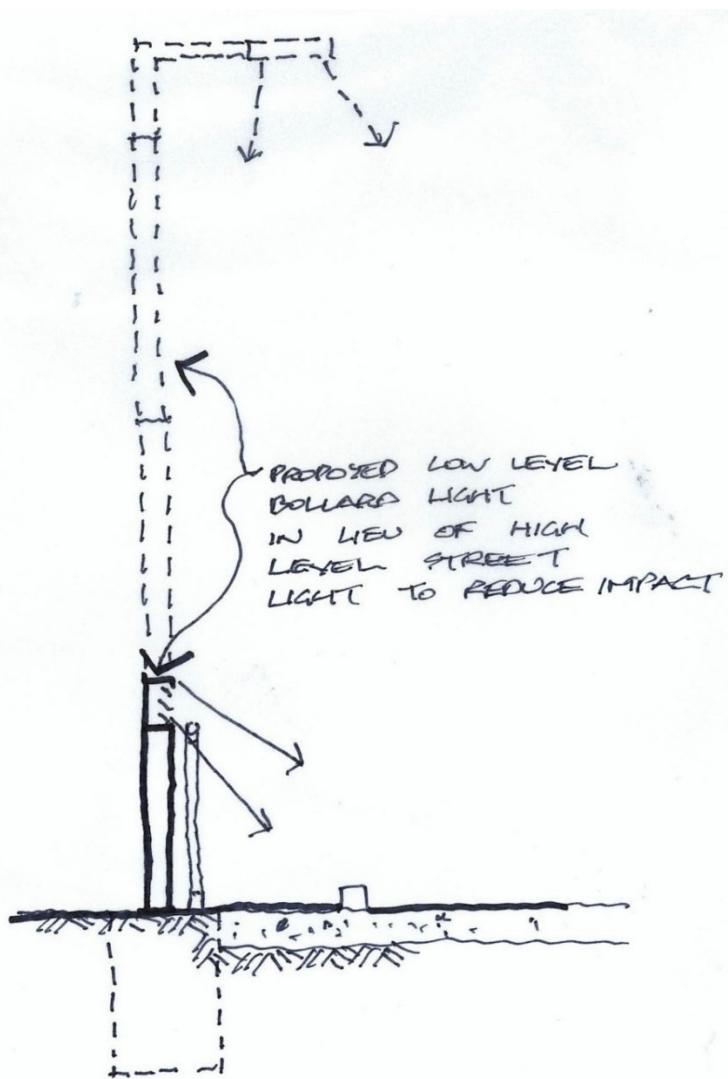
Low level bollard lighting rather than high level street lighting

Install lower-level bollard street lighting rather than high level street lighting to the development to reduce the effect of lighting on the natural environment – particularly for nocturnal animals - to reduce light sky pollution and to reduce the visual effect on Riverside Cabins.

Low level bollard lighting would add to the ambience of the development

High level lighting could be limited to the Carpark if needed

Please see below a sketch of the proposed low level bollard lighting:



We request that the above be considered by the applicant or included as DA conditions in any relevant approval.

Regards,



SUB-14933

Please provide your view on the application

I object to it

submission

I object to developing the golf course for more accommodation.

SUB-14935

Please provide your view on the application

I object to it

submission

Please see attached submission document

[REDACTED]
[REDACTED]
28 January 2026

Thredbo Golfcourse Subdivision proposed DA (Amended) – Objection

Premises: Lot 876 DP 1243112 and Lot 500 DP 1118419, Thredbo Golf Course,
Thredbo Village, Kosciuszko National Park

Proposal: Subdivision and reconfiguration of golf course and associated works

Application Number: DA 23/13081

Planning Portal Number: PAN-366203

Development Type: Nominated Integrated Development / Integrated Development (not
designated development)

Reportable Political Donations – No donations have been made within the last two years

The amended proposed DA for the Thredbo Golfcourse Subdivision is an improved proposal with greater consideration for several aspects.

We make this objection to request that the proposed DA further includes greater resolution of and commitment to resolving traffic including pedestrian management issues beyond the site, where created or exacerbated by the proposed development. We note the current (revised) DA proposal includes:

- a) **A total of 111 new car spaces** with these additional vehicles travelling to/from new accommodation carparks spaces (63) or the new public carpark (48) and entering and exiting the site at the junction of Friday Drive/ Diggings Terrace/ Crackenback Drive;
- b) **A potential average total of 312 new pedestrians in the area**, with 168 additional overnight visitors and an average of 144 new pedestrians from the public carpark entering and exiting the site at the junction of Friday Drive/ Diggings Terrace/ Crackenback Drive, with bus transport being used at times but not guaranteed;
- c) In addition, '**car park cruising**' **will significantly and inevitably increase** traffic entering and exiting the site at the junction of Friday Drive/ Diggings Terrace/ Crackenback Drive due to the proposed new public carpark on the site, creating pedestrian safety risks.
- d) **There is no inclusion of a commitment for additional buses** to manage increased visitors in this area.

No small part of Thredbo Village's attractiveness lies in its true village atmosphere reflected in amenable access on foot, low and slow traffic, and safe high pedestrian or bike activity for families, and visitors of all ages. This should be better considered and framed in the Development proposal.

The development should shoulder responsibility for the considerable number of additional pedestrians the car parking and accommodation will generate, to avoid serious safety risks.

A traffic management plan that accommodates the broader outcomes of increased car and pedestrian traffic impacts - day and night, summer and winter - to ensure safe, family friendly pedestrian access to Thredbo's key village activities and facilities should be required as part of the Development Application approval.

1. The Traffic Impact Assessment does not adequately consider the desired and actual pedestrian movements of a ski village in winter and a mountain bike village in summer seasons.

Using the Traffic Impact Assessment calculations quoted (from *Thredbo Development Guidelines* recommendation that each lot should provide one (1) car space for every three (3) beds), it is reasonable to also propose that 1 public car (space) will, on average, bring 3 visitors. Thereby, in addition to the 168 pax using the development accommodation, the public carpark will potentially bring, on average, 144 additional visitors using the bus or walking or riding mountain bikes to/from the main terminal and/or village and facilities – **a total of 312 potential new pedestrians and riders (*refer 1.2).**

While we assume the bus service will be used this is not guaranteed, and the Traffic Impact Assessment fails to include any recommendations to increase bus services to manage peak loads. Many additional visitors will opt to walk with equipment and children in ski season, and/or ride on the roads with children in the summer season.

1.1 We object to the public carpark which will create a significant overloaded pinch-point for cars and pedestrians at the junction of Friday Drive/ Diggings Terrace/ Crackenback Drive as well as generally increase traffic volume on Friday Drive for both approaching and leaving traffic. This traffic will be multiples of the actual development car space numbers, evidenced by the current cruising traffic in this area seeking chance public carparking. Traffic jams in peak times will be inevitable. The volume of cars moving around will create a safety risk to drivers and pedestrians.

The public carpark is a considerable size at 48 spaces and should not be approved, **and any new parking should be concentrated at the Friday Flat end of the Village** to maintain the walker-friendly village and provide pedestrian safety. Signage that deters car park cruising should be installed.

1.2 We object to the pedestrian safety risks that the development creates via the increased numbers of cars and visitors (averaging 312 per day).

The traffic management plan should include safe pedestrian access beyond the site extent – to the lifts and Village amenities - for the increased visitor numbers using the proposed site. This could be achieved with minor infill works and should include installing new safe footpaths and crosswalks:

- (1) from the bridge at the junction of Friday Drive/ Diggings Terrace/ Crackenback Drive to enable a safe crossing to join to the Village Green footpath; and
- (2) similarly at the Alpine Hotel end of the Village Green (skate park end) to join up with the path on the river side and ensure a continuous, safe pathway is provided.

Without this, visitors of all ages - walking in skiboots, carrying skis and snowboards, and bike riders - must walk or ride on the road at some sections. This unsafe situation is significantly exacerbated by the development accommodation and the public carpark, and as such should be the responsibility of the Golfcourse development and ensured through DA requirements by an acceptable, comprehensive Traffic management plan coordinated with the Thredbo management.

1.3 The proposal fails to indicate if bus services would be increased by the Thredbo Management to manage increased pedestrian activity and provide a safe walk and ride outcome.

The DA conditions should include confirmation that a coordinated approach has been considered with Thredbo Management, including approval for capital and operational expenditure to increase buses and staff at peak times to alleviate safety risks for visitors walking to the lifts and Village amenities.

2. Screening

The revised DA improves the visual impact of roads and car traffic within the proposed site by moving the carpark beyond the Community Centre, however further screening and landscaping in a style consistent with the adjacent natural bushland should be required by the DA to screen the significant rock walling to road sides, lighting, and car activity from the Riverside Cabins.

Additionally, given the difficulty of planting and maintaining vegetation to achieve successful long-term outcomes in the montane environment, the DA conditions should include requirements for additional planting and ongoing supervision with replacement where plants fail to ensure that the screen planting is successful to full maturity and is long-term.

We request consideration of these safety and visual amenity issues to be included in the DA conditions before approval.

Regards,

A solid black rectangular box used to redact a signature.

SUB-14944

Please provide your view on the application

I object to it

submission

Please find my objection submission attached.

2 February 2026.

**SUBMISSION – SEPP (Precincts—Regional) 2021
Snowy Activation Precinct – Thredbo Alpine Village**

1. Statutory Framework and Threshold Issue

Under the State Environmental Planning Policy (Precincts—Regional) 2021, development within the Snowy Activation Precinct (SAP) must satisfy the Development Performance Criteria, which are mandatory and legally binding preconditions to the grant of development consent.

For development within Thredbo Alpine Village, two performance criteria are fundamental and interrelated:

- compliance with authorised accommodation bed capacity, and
- availability of critical infrastructure and utilities, including wastewater treatment capacity.

The present development application proposes an increase in accommodation beds within Thredbo Alpine Village. NSW Planning, as consent authority, cannot lawfully grant consent where the proposal cannot be demonstrated to satisfy these mandatory performance criteria, or where approval would compound existing non-compliance with statutory controls.

2. Bed Capacity as a Mandatory Constraint

Accommodation bed numbers in Thredbo Alpine Village are capped by statutory lease and park management controls, forming an essential component of the SAP carrying-capacity framework. The SAP assumes that any additional bed development occurs within the authorised village-wide bed envelope, unless that envelope is lawfully amended prior to the determination of development applications.

Publicly available information demonstrates that:

- The authorised village-wide bed limit is approximately 4,820 beds;
- Actual bed numbers across a substantial number of lots materially exceed their authorised lease limits, commonly by 10–40% or more;
- As a result, the practical bed count of the village is likely already above the authorised limit; and
- The approval of an additional 190 beds would compound an existing exceedance rather than assess the proposal against a lawful baseline.

It is a well-established planning principle that existing unlawful development cannot be treated as the status quo. A consent authority may not lawfully approve further development by normalising or disregarding existing non-compliance. To do so would incrementally legitimise unlawful development and undermine the integrity of the SAP framework.

3. Evidence of Existing Bed Non-Compliance

A sample analysis of accommodation providers within Thredbo Alpine Village demonstrates widespread exceedance of authorised bed numbers. Licensed bed figures are drawn from

Schedule 8 – Accommodation Bed Numbers, Kosciuszko National Park, published by NSW Government. Actual bed numbers are derived from publicly advertised accommodation capacities.

The sample demonstrates non-compliance ranging from 108% to 350% of authorised limits, with an average exceedance of approximately 147% across the sample. The sample size of 34 beds is sufficient to support inferential conclusions.

LOT	Name	Schedule - 8 Licence Bed No.	Actual Bed Nos.	% Exceedance	Evidence Source
504	Wintergreen 3, 5, 6 and 7	10	15	150%	Discover Snowy Mountains & Thredbo ski accommodation listings
503	Wintergreen 4 & 8	12	13	108%	Discover Snowy Mountains & Thredbo ski accommodation listings
505	Wintergreen 10, 11 & 12	10	15	150%	booking.com website
806 (7)	Inala 7	2	7	350%	Belle Property Escapes website
		34	50	147%	

On a village-wide basis, even conservative assumptions demonstrate breach of the authorised cap. If only 50% of lots exceed their authorised limits by 20%, the village-wide cap is exceeded. Based on the observed average exceedance, the effective bed count may already exceed 6,000 beds.

Failure to consider this evidence would constitute a failure to consider a mandatory relevant consideration under s 4.15(1) of the Environmental Planning and Assessment Act 1979.

4. Consequence for the Present Application

Given the statutory nature of bed limits and their direct linkage to infrastructure capacity, the public interest requires that:

- actual bed numbers be verified;
- existing non-compliances be addressed and rectified;
- compliance with the authorised bed envelope be restored;
- before any further increase in bed capacity is considered.

Approving additional accommodation in circumstances where existing limits are likely already exceeded would be inconsistent with the SAP and contrary to the SEPP.

5. Wastewater Infrastructure as a Binding Constraint

The Snowy Mountains SAP Master Plan and supporting technical studies identify that the existing Thredbo Sewerage Treatment Plant (STP) and associated network cannot support additional growth without substantial upgrade, replacement and, potentially, amendment of licence conditions.

SAP Development Performance Criteria require that development be supported by adequate utilities and services. This requirement is not aspirational; it is a hard precondition to development approval.

6. Evidence of Existing STP Capacity Failure

EPA Environment Protection Licence compliance records for the Thredbo STP demonstrate:

- repeated exceedances of licensed discharge volumes during peak ski-season periods; and
- ongoing non-compliance across multiple parameters, including phosphorus, nitrogen, ammonia, and oil and grease.

<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1599&id=1599&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued>

These records establish that the STP is already operating at or beyond its lawful capacity during peak demand. Any additional wastewater generation would exacerbate existing non-compliance and environmental risk.

This converts wastewater capacity from a general planning consideration into a known and evidenced constraint. The relevant EPA compliance records are publicly available.

7. Inadequacy of Applicant's Infrastructure Evidence

The applicant relies on a document titled "Wastewater Treatment Plant Capacity Assessment". However, the document:

- addresses potable water provision rather than wastewater treatment capacity;
- does not assess licensed STP capacity or EPA compliance history;
- does not address peak seasonal loading; and
- does not demonstrate that the STP can lawfully accommodate additional wastewater generation.

In circumstances where wastewater capacity is a core SAP performance criterion, the absence of a competent and comprehensive wastewater capacity assessment is, of itself, a sufficient basis for refusal.

8. Statutory Outcome

Development Performance Criteria (including clause 13.2.A–D) cannot be satisfied where:

- the existing STP is already operating beyond licensed capacity during peak periods;
- recorded non-compliances demonstrate systemic infrastructure failure; and
- no enforceable upgrade or replacement is secured prior to occupation.

Accordingly, the development cannot lawfully be approved.

Conclusion

The SAP framework integrates bed capacity and wastewater infrastructure capacity as fundamental controls on development within Thredbo Alpine Village.

The present application:

- increases accommodation bed numbers;
- increases wastewater generation;
- relies on infrastructure already operating beyond capacity; and
- does not secure infrastructure upgrades as a condition precedent to development.

Approval in these circumstances would be inconsistent with the Snowy Mountains SAP Master Plan, contrary to the SEPP, and would involve a failure to properly consider mandatory relevant considerations under s 4.15 of the EP&A Act. Such a consent would be vulnerable to being set aside by the Land and Environment Court.

Issue for Determination

Whether the consent authority may lawfully approve a development that results in a material increase in bed capacity within Thredbo Alpine Village where:

- existing bed non-compliance likely already exceeds authorised limits;
- wastewater treatment infrastructure is operating at or beyond capacity;
- EPA records demonstrate ongoing non-compliance; and
- no prior, enforceable infrastructure upgrade or planning framework amendment is secured.

SUB-14945

Please provide your view on the application

I object to it

submission

Please find my objection submission attached.

2 February 2026.

SUBMISSION – SEPP (Precincts—Regional) 2021
Snowy Activation Precinct – Thredbo Alpine Village

1. Statutory Framework and Threshold Issue

Under the State Environmental Planning Policy (Precincts—Regional) 2021, development within the Snowy Activation Precinct (SAP) must satisfy the Development Performance Criteria, which are mandatory and legally binding preconditions to the grant of development consent.

For development within Thredbo Alpine Village, two performance criteria are fundamental and interrelated:

- compliance with authorised accommodation bed capacity, and
- availability of critical infrastructure and utilities, including wastewater treatment capacity.

The present development application proposes an increase in accommodation beds within Thredbo Alpine Village. NSW Planning, as consent authority, cannot lawfully grant consent where the proposal cannot be demonstrated to satisfy these mandatory performance criteria, or where approval would compound existing non-compliance with statutory controls.

2. Bed Capacity as a Mandatory Constraint

Accommodation bed numbers in Thredbo Alpine Village are capped by statutory lease and park management controls, forming an essential component of the SAP carrying-capacity framework. The SAP assumes that any additional bed development occurs within the authorised village-wide bed envelope, unless that envelope is lawfully amended prior to the determination of development applications.

Publicly available information demonstrates that:

- The authorised village-wide bed limit is approximately 4,820 beds;
- Actual bed numbers across a substantial number of lots materially exceed their authorised lease limits, commonly by 10–40% or more;
- As a result, the practical bed count of the village is likely already above the authorised limit; and
- The approval of an additional 190 beds would compound an existing exceedance rather than assess the proposal against a lawful baseline.

It is a well-established planning principle that existing unlawful development cannot be treated as the status quo. A consent authority may not lawfully approve further development by normalising or disregarding existing non-compliance. To do so would incrementally legitimise unlawful development and undermine the integrity of the SAP framework.

3. Evidence of Existing Bed Non-Compliance

A sample analysis of accommodation providers within Thredbo Alpine Village demonstrates widespread exceedance of authorised bed numbers. Licensed bed figures are drawn from

Schedule 8 – Accommodation Bed Numbers, Kosciuszko National Park, published by NSW Government. Actual bed numbers are derived from publicly advertised accommodation capacities.

The sample demonstrates non-compliance ranging from 108% to 350% of authorised limits, with an average exceedance of approximately 147% across the sample. The sample size of 34 beds is sufficient to support inferential conclusions.

LOT	Name	Schedule - 8 Licence Bed No.	Actual Bed Nos.	% Exceedance	Evidence Source
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505	Wintergreen 10, 11 & 12	10	15	150%	booking.com website
806 (7)	Inala 7	2	7	350%	Belle Property Escapes website
		34	50	147%	

On a village-wide basis, even conservative assumptions demonstrate breach of the authorised cap. If only 50% of lots exceed their authorised limits by 20%, the village-wide cap is exceeded. Based on the observed average exceedance, the effective bed count may already exceed 6,000 beds.

Failure to consider this evidence would constitute a failure to consider a mandatory relevant consideration under s 4.15(1) of the Environmental Planning and Assessment Act 1979.

4. Consequence for the Present Application

Given the statutory nature of bed limits and their direct linkage to infrastructure capacity, the public interest requires that:

- actual bed numbers be verified;
- existing non-compliances be addressed and rectified;
- compliance with the authorised bed envelope be restored;
- before any further increase in bed capacity is considered.

Approving additional accommodation in circumstances where existing limits are likely already exceeded would be inconsistent with the SAP and contrary to the SEPP.

5. Wastewater Infrastructure as a Binding Constraint

The Snowy Mountains SAP Master Plan and supporting technical studies identify that the existing Thredbo Sewerage Treatment Plant (STP) and associated network cannot support additional growth without substantial upgrade, replacement and, potentially, amendment of licence conditions.

SAP Development Performance Criteria require that development be supported by adequate utilities and services. This requirement is not aspirational; it is a hard precondition to development approval.

6. Evidence of Existing STP Capacity Failure

EPA Environment Protection Licence compliance records for the Thredbo STP demonstrate:

- repeated exceedances of licensed discharge volumes during peak ski-season periods; and
- ongoing non-compliance across multiple parameters, including phosphorus, nitrogen, ammonia, and oil and grease.

<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1599&id=1599&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued>

These records establish that the STP is already operating at or beyond its lawful capacity during peak demand. Any additional wastewater generation would exacerbate existing non-compliance and environmental risk.

This converts wastewater capacity from a general planning consideration into a known and evidenced constraint. The relevant EPA compliance records are publicly available.

7. Inadequacy of Applicant's Infrastructure Evidence

The applicant relies on a document titled "Wastewater Treatment Plant Capacity Assessment". However, the document:

- addresses potable water provision rather than wastewater treatment capacity;
- does not assess licensed STP capacity or EPA compliance history;
- does not address peak seasonal loading; and
- does not demonstrate that the STP can lawfully accommodate additional wastewater generation.

In circumstances where wastewater capacity is a core SAP performance criterion, the absence of a competent and comprehensive wastewater capacity assessment is, of itself, a sufficient basis for refusal.

8. Statutory Outcome

Development Performance Criteria (including clause 13.2.A–D) cannot be satisfied where:

- the existing STP is already operating beyond licensed capacity during peak periods;
- recorded non-compliances demonstrate systemic infrastructure failure; and
- no enforceable upgrade or replacement is secured prior to occupation.

Accordingly, the development cannot lawfully be approved.

Conclusion

The SAP framework integrates bed capacity and wastewater infrastructure capacity as fundamental controls on development within Thredbo Alpine Village.

The present application:

- increases accommodation bed numbers;
- increases wastewater generation;
- relies on infrastructure already operating beyond capacity; and
- does not secure infrastructure upgrades as a condition precedent to development.

Approval in these circumstances would be inconsistent with the Snowy Mountains SAP Master Plan, contrary to the SEPP, and would involve a failure to properly consider mandatory relevant considerations under s 4.15 of the EP&A Act. Such a consent would be vulnerable to being set aside by the Land and Environment Court.

Issue for Determination

Whether the consent authority may lawfully approve a development that results in a material increase in bed capacity within Thredbo Alpine Village where:

- existing bed non-compliance likely already exceeds authorised limits;
- wastewater treatment infrastructure is operating at or beyond capacity;
- EPA records demonstrate ongoing non-compliance; and
- no prior, enforceable infrastructure upgrade or planning framework amendment is secured.

SUB-14946

Please provide your view on the application

I object to it

submission

I object to this proposal, please see attached comments

2 February 2026.

SUBMISSION – SEPP (Precincts—Regional) 2021
Snowy Activation Precinct – Thredbo Alpine Village

1. Statutory Framework and Threshold Issue

Under the State Environmental Planning Policy (Precincts—Regional) 2021, development within the Snowy Activation Precinct (SAP) must satisfy the Development Performance Criteria, which are mandatory and legally binding preconditions to the grant of development consent.

For development within Thredbo Alpine Village, two performance criteria are fundamental and interrelated:

- compliance with authorised accommodation bed capacity, and
- availability of critical infrastructure and utilities, including wastewater treatment capacity.

The present development application proposes an increase in accommodation beds within Thredbo Alpine Village. NSW Planning, as consent authority, cannot lawfully grant consent where the proposal cannot be demonstrated to satisfy these mandatory performance criteria, or where approval would compound existing non-compliance with statutory controls.

2. Bed Capacity as a Mandatory Constraint

Accommodation bed numbers in Thredbo Alpine Village are capped by statutory lease and park management controls, forming an essential component of the SAP carrying-capacity framework. The SAP assumes that any additional bed development occurs within the authorised village-wide bed envelope, unless that envelope is lawfully amended prior to the determination of development applications.

Publicly available information demonstrates that:

- The authorised village-wide bed limit is approximately 4,820 beds;
- Actual bed numbers across a substantial number of lots materially exceed their authorised lease limits, commonly by 10–40% or more;
- As a result, the practical bed count of the village is likely already above the authorised limit; and
- The approval of an additional 190 beds would compound an existing exceedance rather than assess the proposal against a lawful baseline.

It is a well-established planning principle that existing unlawful development cannot be treated as the status quo. A consent authority may not lawfully approve further development by normalising or disregarding existing non-compliance. To do so would incrementally legitimise unlawful development and undermine the integrity of the SAP framework.

3. Evidence of Existing Bed Non-Compliance

A sample analysis of accommodation providers within Thredbo Alpine Village demonstrates widespread exceedance of authorised bed numbers. Licensed bed figures are drawn from

Schedule 8 – Accommodation Bed Numbers, Kosciuszko National Park, published by NSW Government. Actual bed numbers are derived from publicly advertised accommodation capacities.

The sample demonstrates non-compliance ranging from 108% to 350% of authorised limits, with an average exceedance of approximately 147% across the sample. The sample size of 34 beds is sufficient to support inferential conclusions.

LOT	Name	Schedule - 8 Licence Bed No.	Actual Bed Nos.	% Exceedance	Evidence Source
504	Wintergreen 3, 5, 6 and 7	10	15	150%	Discover Snowy Mountains & Thredbo ski accomodation listings
503	Wintergreen 4 & 8	12	13	108%	Discover Snowy Mountains & Thredbo ski accomodation listings
505	Wintergreen 10, 11 & 12	10	15	150%	boooking.com website
806 (7)	Inala 7	2	7	350%	Belle Property Escapes website
		34	50	147%	

On a village-wide basis, even conservative assumptions demonstrate breach of the authorised cap. If only 50% of lots exceed their authorised limits by 20%, the village-wide cap is exceeded. Based on the observed average exceedance, the effective bed count may already exceed 6,000 beds.

Failure to consider this evidence would constitute a failure to consider a mandatory relevant consideration under s 4.15(1) of the Environmental Planning and Assessment Act 1979.

4. Consequence for the Present Application

Given the statutory nature of bed limits and their direct linkage to infrastructure capacity, the public interest requires that:

- actual bed numbers be verified;
- existing non-compliances be addressed and rectified;
- compliance with the authorised bed envelope be restored;
- before any further increase in bed capacity is considered.

Approving additional accommodation in circumstances where existing limits are likely already exceeded would be inconsistent with the SAP and contrary to the SEPP.

5. Wastewater Infrastructure as a Binding Constraint

The Snowy Mountains SAP Master Plan and supporting technical studies identify that the existing Thredbo Sewerage Treatment Plant (STP) and associated network cannot support additional growth without substantial upgrade, replacement and, potentially, amendment of licence conditions.

SAP Development Performance Criteria require that development be supported by adequate utilities and services. This requirement is not aspirational; it is a hard precondition to development approval.

6. Evidence of Existing STP Capacity Failure

EPA Environment Protection Licence compliance records for the Thredbo STP demonstrate:

- repeated exceedances of licensed discharge volumes during peak ski-season periods; and
- ongoing non-compliance across multiple parameters, including phosphorus, nitrogen, ammonia, and oil and grease.

<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=1599&id=1599&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued>

These records establish that the STP is already operating at or beyond its lawful capacity during peak demand. Any additional wastewater generation would exacerbate existing non-compliance and environmental risk.

This converts wastewater capacity from a general planning consideration into a known and evidenced constraint. The relevant EPA compliance records are publicly available.

7. Inadequacy of Applicant's Infrastructure Evidence

The applicant relies on a document titled "Wastewater Treatment Plant Capacity Assessment". However, the document:

- addresses potable water provision rather than wastewater treatment capacity;
- does not assess licensed STP capacity or EPA compliance history;
- does not address peak seasonal loading; and
- does not demonstrate that the STP can lawfully accommodate additional wastewater generation.

In circumstances where wastewater capacity is a core SAP performance criterion, the absence of a competent and comprehensive wastewater capacity assessment is, of itself, a sufficient basis for refusal.

8. Statutory Outcome

Development Performance Criteria (including clause 13.2.A–D) cannot be satisfied where:

- the existing STP is already operating beyond licensed capacity during peak periods;
- recorded non-compliances demonstrate systemic infrastructure failure; and
- no enforceable upgrade or replacement is secured prior to occupation.

Accordingly, the development cannot lawfully be approved.

Conclusion

The SAP framework integrates bed capacity and wastewater infrastructure capacity as fundamental controls on development within Thredbo Alpine Village.

The present application:

- increases accommodation bed numbers;
- increases wastewater generation;
- relies on infrastructure already operating beyond capacity; and
- does not secure infrastructure upgrades as a condition precedent to development.

Approval in these circumstances would be inconsistent with the Snowy Mountains SAP Master Plan, contrary to the SEPP, and would involve a failure to properly consider mandatory relevant considerations under s 4.15 of the EP&A Act. Such a consent would be vulnerable to being set aside by the Land and Environment Court.

Issue for Determination

Whether the consent authority may lawfully approve a development that results in a material increase in bed capacity within Thredbo Alpine Village where:

- existing bed non-compliance likely already exceeds authorised limits;
- wastewater treatment infrastructure is operating at or beyond capacity;
- EPA records demonstrate ongoing non-compliance; and
- no prior, enforceable infrastructure upgrade or planning framework amendment is secured.

SUB-14950

Please provide your view on the application

I object to it

submission

I object to the proposal for the reason given in the attached.

2 February 2026.

SUBMISSION – SEPP (Precincts—Regional) 2021
Snowy Activation Precinct – Thredbo Alpine Village

1. Statutory Framework and Threshold Issue

Under the State Environmental Planning Policy (Precincts—Regional) 2021, development within the Snowy Activation Precinct (SAP) must satisfy the Development Performance Criteria, which are mandatory and legally binding preconditions to the grant of development consent.

For development within Thredbo Alpine Village, two performance criteria are fundamental and interrelated:

- compliance with authorised accommodation bed capacity, and
- availability of critical infrastructure and utilities, including wastewater treatment capacity.

The present development application proposes an increase in accommodation beds within Thredbo Alpine Village. NSW Planning, as consent authority, cannot lawfully grant consent where the proposal cannot be demonstrated to satisfy these mandatory performance criteria, or where approval would compound existing non-compliance with statutory controls.

2. Bed Capacity as a Mandatory Constraint

Accommodation bed numbers in Thredbo Alpine Village are capped by statutory lease and park management controls, forming an essential component of the SAP carrying-capacity framework. The SAP assumes that any additional bed development occurs within the authorised village-wide bed envelope, unless that envelope is lawfully amended prior to the determination of development applications.

Publicly available information demonstrates that:

- The authorised village-wide bed limit is approximately 4,820 beds;
- Actual bed numbers across a substantial number of lots materially exceed their authorised lease limits, commonly by 10–40% or more;
- As a result, the practical bed count of the village is likely already above the authorised limit; and
- The approval of an additional 190 beds would compound an existing exceedance rather than assess the proposal against a lawful baseline.

It is a well-established planning principle that existing unlawful development cannot be treated as the status quo. A consent authority may not lawfully approve further development by normalising or disregarding existing non-compliance. To do so would incrementally legitimise unlawful development and undermine the integrity of the SAP framework.

3. Evidence of Existing Bed Non-Compliance

A sample analysis of accommodation providers within Thredbo Alpine Village demonstrates widespread exceedance of authorised bed numbers. Licensed bed figures are drawn from

Schedule 8 – Accommodation Bed Numbers, Kosciuszko National Park, published by NSW Government. Actual bed numbers are derived from publicly advertised accommodation capacities.

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On a village-wide basis, even conservative assumptions demonstrate breach of the authorised cap. If only 50% of lots exceed their authorised limits by 20%, the village-wide cap is exceeded. Based on the observed average exceedance, the effective bed count may already exceed 6,000 beds.

Failure to consider this evidence would constitute a failure to consider a mandatory relevant consideration under s 4.15(1) of the Environmental Planning and Assessment Act 1979.

4. Consequence for the Present Application

Given the statutory nature of bed limits and their direct linkage to infrastructure capacity, the public interest requires that:

- actual bed numbers be verified;
- existing non-compliances be addressed and rectified;
- compliance with the authorised bed envelope be restored;
- before any further increase in bed capacity is considered.

Approving additional accommodation in circumstances where existing limits are likely already exceeded would be inconsistent with the SAP and contrary to the SEPP.

5. Wastewater Infrastructure as a Binding Constraint

The Snowy Mountains SAP Master Plan and supporting technical studies identify that the existing Thredbo Sewerage Treatment Plant (STP) and associated network cannot support additional growth without substantial upgrade, replacement and, potentially, amendment of licence conditions.

SAP Development Performance Criteria require that development be supported by adequate utilities and services. This requirement is not aspirational; it is a hard precondition to development approval.

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These records establish that the STP is already operating at or beyond its lawful capacity during peak demand. Any additional wastewater generation would exacerbate existing non-compliance and environmental risk.

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7. Inadequacy of Applicant's Infrastructure Evidence

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Conclusion

The SAP framework integrates bed capacity and wastewater infrastructure capacity as fundamental controls on development within Thredbo Alpine Village.

The present application:

- increases accommodation bed numbers;
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- no prior, enforceable infrastructure upgrade or planning framework amendment is secured.

SUB-14957

Please provide your view on the application

I object to it

submission

I object to this proposal, please see attached comments

2 February 2026.

SUBMISSION – SEPP (Precincts—Regional) 2021
Snowy Activation Precinct – Thredbo Alpine Village

1. Statutory Framework and Threshold Issue

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- existing bed non-compliance likely already exceeds authorised limits;
- wastewater treatment infrastructure is operating at or beyond capacity;
- EPA records demonstrate ongoing non-compliance; and
- no prior, enforceable infrastructure upgrade or planning framework amendment is secured.

SUB-14959

Please provide your view on the application

I object to it

submission

I strongly object to this application because the redesign of the Thredbo golf course will irreparably damage Australia's highest golf course, a unique recreational asset and special place in Thredbo and the State of NSW. It will intensify development in a fragile natural environment, and will lead to loss of green (and snow-covered) open space and tree / bush space, used by golfers, walkers, joggers, snowshoers and nature lovers. Furthermore, as temperatures rise, and adverse weather events and natural disasters increase in intensity and frequency, doing everything we can to maintain tree canopies and green space is imperative. This development will remove trees, lose green space and increase the built environment - the last thing this precious part of Australia needs.

SUB-14960

Please provide your view on the application

I object to it

submission

Public space and amenity at Thredbo needs to be increased not reduced.

Global warming will continue to reduce the ski season and further decrease the reliability of the season that does remain. Existing property lessees and visitors in general need more diverse and interesting recreation activities and public space.

Replacing public space and, what should be, a prime recreation activity (golf) with accommodation for more people increases the burden on the remaining limited recreation facilities.

Over the years, tennis courts and other facilities have been removed, reducing the attractiveness of Thredbo as a holiday destination for many. Reducing the golf course continues this trend.

Cutting up the course will inevitably reduce patronage even further, and so this development proposal is a cynical first step toward converting the entire golf course into a residential development.

Before adding more dwellings, the operators of the village should be pushed to increase the attractiveness of the village to increase utilisation of existing dwellings. When the existing accommodation is being highly occupied there will be a case to be made for further accommodation.

Selling off public space and amenity is a lazy move that must be stopped.

SUB-14965

This submission is in objection to the proposed development DA 23/13081 Golf Course Subdivision, Thredbo.

As a mountain lover who has enjoyed skiing and hiking in the Kosciusko national park for the past 50 years and more recently as a property owner in Riverside Cabins we are strongly opposed to the proposed golf course development DA 23/13081 due to it having negative impacts on the National Park's flora and fauna, Riverside Cabin's owners and visitors, golf course users, Thredbo visitors and the local riverside wombats and snakes.

Road location and impacts

- The new road has been located along the high side of the existing fairway adjoining the Thredbo river.
- The road location is within eyesight and earshot of the riverside walking trail, the most popular village walk regularly used by walkers and riders which will no longer enjoy the ambience of a walk without the intrusion of vehicles running parallel to the trail.
- The relocated road is now even more prominent to riverside cabins, being located on the high side of the existing fairway means that it will be directly in the eyesight of riverside cabins as they are elevated and look directly across and above the vegetation at the same level as the road.
- The visual impact assessment is inaccurate and misleading as it includes photos from the ground level adjacent to the river, on the riverside cabins side, and suggests a protected vista from riverside cabins. This simply is not the case for people staying in the cabins who's outlook is from an elevated position and is actually severely affected by the current proposal. The summer vista of the river and natural bush land from the balconies and the winter vista of the bush and mountains from indoors is a huge part of staying at riverside cabins and this is severely adversely impacted by the proposal and not given sufficient consideration in the proposal.
- The unobstructed view up the river from riverside cabins will be adversely affected by the sight of the new dwellings by day and lights from windows and street lighting in the night time.
- Wombats are often found wandering along the river, the riverside walking track and the golf course at night but this will be severely impacted by the introduction of street and dwelling lighting into the nocturnal animals environment along with vehicle lights, noise and fumes from using the adjacent road.
- Over the past 5 years or so the Thredbo mountain bike (mtb) tracks have been gradually moved off the established ski runs and relocated in the wooded areas, ie bottom of flow track relocated from super trail/milk run, section of flow adjacent to the jump park moved into the wooded area, switchbacks crossing world cup replaced with berms in the tree island adjacent to super trail, new revolver section developed in wooded area, top section of ricochet relocated from Anton's and top of high noon into adjacent wooded area. Locating a new road on an existing fairway is not in keeping with this philosophy that other development applications have been required to comply with. It will also be more prominent to the Thredbo village properties situated up on the hillside and will also negatively impact on their vista.
- Constructing a new road on a golf course fairway is not consistent with the efforts to reduce the impact of man made infrastructure on the local national park landscape, the road needs to be hidden from the sight of riverside cabins, the riverside walk and the elevated Thredbo village overlooking the valley.

Traffic

- The traffic impact study undertaken focuses on the Alpine Way where the relative impact is insignificant in comparison to the traffic impact that the development will have on the adjoining village road system which is inadequate and has not been addressed. Introducing more vehicles (residents cars, busses, delivery vehicles, garbage vehicles, those seeking parking etc) onto the

existing local roads that provide access to the proposed new development in this part of the village will have a significant impact as these existing roads are already too narrow and have inadequate pedestrian facilities in their current form. The additional vehicles in this relatively quiet end of the village will adversely affect pedestrian safety as there are no footpaths along existing roads and pedestrians are forced to walk on the narrow roads, the volume of vehicles will increase as a result of this development and result in increased pedestrian/vehicle interaction on the narrow roads that have no footpath or area behind kerbs for pedestrians. The number of near misses we have witnessed along here have been numerous and will only increase with the additional traffic.

- Any development that increases the traffic in this vicinity of the village will also result in a significant increase in the pedestrian v vehicle interaction along Diggings Terrace where there is no pedestrian facilities. Any such development needs to address this issue as the safety risks are significant, especially to pedestrians in slippery conditions in winter and cyclists in summer.

Lighting

- The proposed lighting is not in keeping with the lighting in the rest of the village.
- The proposal includes the addition of significant lighting, that is far superior to the existing lighting along other roads in the village, into the darkest area of an undeveloped area of the village where it will have a significant impact on the local nocturnal wildlife and negatively impact riverside cabins who currently enjoy no lights shining into their windows.

Golf course

- The proposal reduces the gold course length by 33%, the current 2100m length is reduced to 1400m.
- The application includes no proposal to remediate the loss of this facility, only a loss of amenity for the sake of a development with no benefit to golfers.
- Have local golf clubs been consulted? I couldn't find any consideration from them in the submission.
- Has Golf NSW been consulted? I couldn't find any consideration from them in the submission.

Vista

- The proposal has not considered the elevated position of riverside cabins, particularly at the southern end of riverside cabins which look directly over the river and the adjacent bush and will see the road with all the passing cars, trucks and busses continuously going back and forth. The proposal does not alleviate this impact and it is not acceptable to those who currently enjoy vistas without any man made infrastructure in view.

Natural bush land

- The location of the proposed lots involves a significant area of bush to be removed and an equivalent area of bush replacement is not included in the proposal with a net loss of existing natural bush and local wildlife habitat.
- There are significant areas of existing fairways that will no longer be used which are not re-vegetated.

Consultation

- The comments we submitted in response to the previous DA submission are not included in this submission and do not appear to have been considered.
- The application doesn't include consideration from the golfing community.

Summary

The proposal does not adequately ameliorate the issues highlighted above, however there are several approaches to this development that would. Should the proposal proceed then it should be modified in accordance with one of the following options.

Alternative option 1 - access the development via the existing service road that is in the vicinity of the proposed 7th fairway.

This option would involve:

- The development of the existing service road instead of putting in a new road.
- Relocating the development to a less prominent area of the village.
- A reduced impact on the existing golf course requiring less disturbance to the most frequently used amenities.

This option would provide the following benefits:

- Minimise the length of new road to be constructed.
- Minimise impact on the golf course and it's reduced length.
- Eliminate impact on riverside walk and river habitat.
- Minimise the impact on lease holders.
- Permits the retention of proposed parking area and even an increase by eliminating the need for a two way road through the proposed parking area.

Alternative option 2 – Start the access road from further up Crackenback Dr and relocate it between the proposed 1st and 9th greens.

This option would require:

- Starting the access road from further up Crackenback Dr on the other side of the proposed 1st fairway and running it between the proposed 1st and 9th greens.
- Running the road through the tree island between the proposed 9th and 2nd fairways, and rejoining the proposed road after the turning circle between lots 2 and 3.
- Establishment of new vegetation along the new fairways (2nd and 3rd) and behind the proposed lots 10,11,12,13,15, 17 and 18 to obscure the view of the lots from riverside cabins and the riverside walk.

This option provides the following benefits:

- Reduces impact on existing lot owners.
- Reduces impact on riverside walking trail.
- Reduces impact on wildlife along the river corridor.
- Permits extension of proposed 2nd hole.
- Permits the retention of proposed parking area and even an increase by eliminating the need for a two way road through the proposed parking area.

Alternative option 3 - locate the proposed road in the trees between the proposed 9th and 2nd fairways

This option would require:

- Moving the 1st green closer to the 9th green and running the road through the tree island between the new 9th and 2nd fairways, in a cutting, and rejoining the proposed road after the turning circle between lots 2 and 3.
- Establish new vegetation along the new fairways (2nd and 3rd) and behind the proposed lots 10,11,12,13,15, 17 and 18 to obscure the view of the lots from riverside cabins and the riverside walk.

This option provides the following benefits:

- Reduces impact on existing lot owners.
- Reduces impact on riverside walking trail.
- Reduces impact on wildlife along the river corridor.
- Permits extension of proposed 2nd hole.

In addition to these options, should the development proposal be pursued:

- The broader golfing community needs to be consulted through liaison with Golf NSW and each local golf club in the Snowy Monaro Shire.
- Pedestrian safety along Diggings Terrace needs to be improved.
- Reinstatement of an equivalent area of cleared bush land should be provided to shield the development from those affected.
- Any proposed roads and vehicles on such roads in this area should not be visible to any one who is not currently affected by a road, including riverside cabins lots and riverside track walkers and bikers.

Thanks for considering our comments and I look forward seeing a revised proposal with the issues addressed.