

Statement of Environmental Effects

Schuss Advanced Mountain Bike Trails

Thredbo Alpine Resort Kosciuszko National Park, NSW

February 2025



Document Control

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Project Number: 24012MO

Kosciuszko Thredbo Pty Ltd



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1 Introduction

This Statement of Environmental Effects (SEE) has been prepared to support the Development Application (DA) for the Schuss Advanced Mountain Bike (MTB) Trails, Thredbo Alpine Resort (hereinafter referred to as the Development).

1.1 Application details

Table 1: Application Details

hredbo Pty Ltd (KT)	
015	
e, Thredbo NSW 2625	
Thredbo Alpine Resort, Kosciuszko National Park,	
e, Thredbo NSW 2625	
112	
aro Regional Council	
ational Parks and Nature Reserves	
nmental Planning Policy (Precincts – Regional) 2021	
Regional SEPP)	
ble	
of Planning, House and Infrastructure	
age 1A Trails)	
Recreation infrastructure	
etation clearing	
nstruction of MTB trail, including earthworks and signage	
e rehabilitation	

1.2 Supporting documentation

This application is supported by the documentation listed below.

Document	Title/Description	Author/Prepared by	Date	Document Reference
Site Environmental	Site Environmental Management	Kosciuszko Thredbo	18/12/2024	Rev 0
Management Plan	Plan – Schuss Advanced Mountain	Pty Ltd		
	Bike Trails			
Site Plan	Site Plan	Kosciuszko Thredbo	5/12/2024	Rev 4
	Proposed BD1 MTB Trail	Pty Ltd, BB		
Site Plan	Site Plan	Kosciuszko Thredbo	26/09/2024	Rev 3
	Proposed BD2 MTB Trail	Pty Ltd, BB		
Plan	Standard Signage Details	Kosciuszko Thredbo	16/02/2022	Rev 1
		Pty Ltd		
Flora and Fauna	Schuss Advanced Mountain Bike	Eco Logical Australia	07/02/2025	Version 3
Assessment	Trails – Thredbo Alpine Resort –	Pty Ltd		
	Flora and Fauna Assessment			
Rehabilitation Plan	Schuss Advanced MTB Trails	Kosciuszko Thredbo	18/12/2024	Rev 0
	Detailed Rehabilitation and	Pty Ltd		
	Monitoring Plan			



2 Site Context

2.1 Location

Thredbo Alpine Resort is located within the southern part of Kosciuszko National Park (KNP), approximately 35 km south-west of Jindabyne in the Snowy Monaro Regional Council LGA.

The Development site is located within the Thredbo Head Lease on Lot 876/DP1243112. The trails commence around the upper section of the Merritts Gondola lift line (also referred to as the "Schuss ski run"). The BD1 trail departs this general area, traversing the native vegetation and terminates at Friday Flat.' The BD2 trail continues down the Merritts Gondola lift line and terminates when it joins the proposed Merritts Intermediate trail (subject to separate DA approval) in the locality.

2.2 Present and previous land uses

Land uses within and adjacent to the site include lifting infrastructure, snowmaking infrastructure, ski runs, access tracks and roads, MTB trails and walking tracks.

2.3 Site contamination

There are no known records of site contamination within the Development site.

2.4 Site description and suitability

The Development site comprises a mix of disturbed and undisturbed vegetation. The site is considered suitable for the trails as it provides suitable gradients for advanced trails and a range of natural technical features that can be incorporated into the trail.

2.5 Previous approvals applicable to the site

The Development will traverse the voluntary offset area within the Merritts Gondola lift line approved under DA 6114 (Stage 1A Trails). A separate modified DA (Planning portal reference: PAN-496540) has been lodged to amend the offset.



egend

Schuss BD1 Trail Schuss BD2 Trail Proposed Intermediate Trail Sidewinder All Mountain Trail 20m Construction Corridor Scale: 1:3,100 2010 0 20 40 60 80

L'AL STOR

Map Projection: Universal Transverse Mercator Horizontal Datum: GDA 1994 Grid: GDA 1994 MGA Zone 55



SITE PLAN

Project: Proposed BD1 MTB Trail Revision: 4 Date: 5/12/2024

Produced By: BB



20m Construction Corridor

Scale: 1:1,929 105 0 10 20 30 40

Map Projection: Universal Transverse Mercator Horizontal Datum: GDA 1994 Grid: GDA 1994 MGA Zone 55



SITE PLAN

Project: Proposed BD2 MTB Trail Revision: 3

Date: 26/09/2024

Produced By: BB



3 Project Description

3.1 Background

Thredbo has long been associated with mountain biking in the Snowy Mountains region of NSW. As Australia's premier biking destination with lift accessed gravity trails, Thredbo has continued to attract both recreational and competitive mountain bikers to the resort since the early 1990s. Each year KT hosts a series of competitions and events, such as the Cannonball Mountain Bike Festival, Gravity Series and Australian Mountain Biking Interschools.

The current network comprises of mostly beginner and intermediate "flow style" trails with banked turns, rolling terrain and predictable surfaces. To diversify the trail network and enhance the guest experience, KT are planning to incorporate different styles of trails into the network, catering to a wider range of riders and their needs. As part of the future network planning, KT has recognised the need for additional advanced downhill graded trails to cater for more advance riders.

The existing black trail at Thredbo is the Cannonball downhill trail and with its popularity and the continuing improvement in rider ability, the addition of more advanced trails will create a more attractive network. The two proposed trails will offer a hard, fast, and steep riding experience that will complement the surrounding trail network and offer an opportunity for riders to gain experience in black downhill graded trails.

3.2 Trail options analysis

A preliminary site assessment was undertaken by key Project personnel (i.e. Project Manager, MTB trail designers, Environmental Officer) to identify potential constraints (e.g. ecological and construction) of the proposed trail alignment and to allow for appropriate controls to be incorporated into the design. During this assessment stage, several walkthroughs of the proposed trail alignments were undertaken to ensure the trail objectives are met whilst minimising the impacts on the natural environment as much as practicable.

On Thursday 4th April 2024, four (4) representatives from DPHI and three (3) representatives from NPWS inspected Development site with the opportunity to provide feedback on the proposal.

3.3 Trail 1

The BD1 trail starts below Merritts Gondola top station at an elevation of approximately 1650 m AHD, and terminates at Friday Flat at approximately 1370 m AHD. The trail crosses the Lower All-mountain trail below Gondola Tower 11, where riders can exit to the right and onto this trail if desired. The trail then continues east through the native vegetation towards the summer access road and Sidewinder, traversing the slope down to Friday Flat where it terminates. The trail is designed with a focus on speed and technical features using natural rock features, rock gardens and jumps, berms and series of switch backs. Site photos and reference points are provided in **Appendix A**.

3.4 Trail 2

The BD2 trail starts below Merritts Gondola top station at an elevation of approximately 1640 m AHD and terminates uphill of the Gondola mid station at approximately 1470 m AHD. BD2 has been designed with a focus on technical free riding rather than speed. It contains more directional changes, incorporating technical features such as jumps, berms, switch backs and natural terrain features.



The trail crosses the Lower All-mountain trail adjacent to Gondola Tower 11, where riders can exit to the right and onto this trail if desired. The trail continues through a series of tight switchbacks, crosses through the Gunbarrel lift corridor between Towers 9 and 10 before crossing back into the Gondola lift corridor. The trail then links onto the proposed Merritts Intermediate Trail (subject to separate DA approval) and onto Sidewinder uphill of the Merritts Gondola mid station. Site photos and reference points are provided in **Appendix A**.

3.5 Voluntary environmental offset considerations

In the upper section of the Merritts Gondola lift corridor (between towers 9-13), the trails traverse a voluntary offset area that was approved under DA 6114 (Stage 1A MTB Trails) (**Figure 4**). This offset was approved prior to the Biodiversity Offset Scheme (BOS) coming into effect, therefore not associated with offsetting obligations under the *Biodiversity Conservation Act 2016*.

The offset area is subject to a management regime, see extract in **Figure 5**. Full details of the offset requirements are outlined in the *Rehabilitation and Environmental Offset Plan, Stage 1A Mountain Bike Trails, Thredbo DA 6114, April 2015* (Stage 1A Offset Plan).





dabyne**planning**

Figure 4: Merritts Gondola lift line offset area (extract from Stage 1A Offset Plan)



2.3.1 Merritts Lift Line

A new management regime for the upper section of the Merritts lift line (as identified on the plan provided in Attachment 1) will be implemented to allow the heath vegetation to regenerate and recruit. The new management regime will preclude the current routine maintenance activity of slashing the heath vegetation on a bi-annual basis and will be replaced by a new management regime as follows:

The aim of the new management regime is to allow for native vegetation grow and recruit within this area to an approximate height of 500mm. The height of the vegetation in the area will be managed by cutting the vegetation using a combination of hand-held scrub cutters as and when required to maintain the 500mm height. This height has been determined to be the best compromise between operational requirements (they are located underneath a chairlift where pedestrian access may be required from time to time) and the requirement to allow cover for any fauna traversing the site.

There are no plans to include any proposed planting in this area and to simply let the area naturally recruit.

However, this does not preclude the potential to supplement the native vegetation in the future if it is shown during subsequent site inspections that there has been a significant decline in native vegetation cover.

Rehabilitation and Environmental Offsets Plan

Page 4

Figure 5: Merritts Gondola lift line offset requirements (extract from Stage 1A Offset Plan)

The two trails have a combined trail length within the offset area of 345 m. At a 3 m maximum disturbance width, the disturbance area will be 1035m² within the offset area. A separate modified DA has been lodged (Planning portal reference: PAN-496540) to modify DA 6114. The modification is for the following:

A new 1400m² offset area is proposed around the Alpine Coaster on the Lovers Leap ski run adjacent to the approved MTB 1C offset area. The offset will include the cessation of slashing (like-for-like offset), and the planting of 280 Snow Gums across the entire offset area (areas LL1 & LL2) as well as 230 native shrubs in the upper area of the offset (LL1) as per the attached plan.

The Stage 1A offset addendum has been lodged with the modified DA (Planning portal reference: PAN-496540).





3.6 Trail design and construction

There are no fixed rules for designing and constructing trails. The following guidelines provide recommendations for trail design and construction that cater to a range of user groups, trail types and intended degree of difficulty. The design of trails is dependent upon various factors such as terrain (soil types, gradient of the land, natural features, vegetation etc.) safety of riders, user groups and style of trail (e.g. gravity, cross-country).

- IMBA Guidelines
- Guidelines for trail planning, design and management: a toolkit for state and local government agencies, community groups and investors on how to plan, manage and market exceptional trail experiences (TRC Tourism 2015)
- Australian Mountain Bike Trail Guidelines (AusCycling 2019)
- Design principles applied to the construction of existing trails within the resort, including: trails for everyone, recreation versus competition, one-way trails, trail difficulty ratings, trail names and minimise environmental impacts.

A summary of the key trail design and construction techniques are provided below.

Table 3: Trail design and construction techniques

Element	Details	
Trail type	One-way (descending) – This design component is a key risk management technique to minimise	
	the likelihood of head-on collisions between riders.	
Trail tread	The tread refers to the actual surface of the trail upon which users travel. The width of the tread	
	varies depending on the intended user, type of trail and proposed degree of difficulty. The trail	
	surface will be predominately natural soil, with local crushed granodiorite used where required.	
Trail corridor	The trail corridor refers to the full dimensions of the trail, including the area on either side of the	
	tread and the space overhead that needs to be cleared of brush and obstacles. IMBA suggests the	
	trail corridor is generally double the width of the tread, dependent upon the slope. The greater	
	the slope, the wider the corridor due to the extent of the upper and lower batters.	
	e - use -	
	Color Color	
	ege Vi	
	Trail Ceiling	
	The share we are the state of t	
	Trail Tread	
	Trail Carille	
	Example of trail corridor (Source: IMBA)	
Natural	The trail will incorporate TTFs (e.g. log roll, rock, stumps).	
Obstacles and		
Technical Trail		
Features (TTFs)		



Element	Details
Trail gradient	Trail gradient to consider guideline recommendations applicable to the site, taking into account
Trail signage	Trail signage is installed to clearly mark the trail, inform users of their responsibilities, aid in navigation and provide key information. Coordinated directional signage will be installed at relevant locations to direct riders from key public areas to the trail head. Generally, trail signage includes:
	 Decision point signs Decision point signs generally comprise posts with information in relation to important departure and destination locations along the trail. Signs are generally 400 x 200 mm, on a 500 mm round post, 1,800 mm high. The signs generally include the following information: trail name
	 arrow indicating direction of trail trail number (reference to trail network map) difficulty symbol e.g. blue for intermediate trail type e.g. flow trail user type e.g. bikes only, no walkers, adaptive bikes trail network logo
	• trail network logo. IOWER ALL-MOUNTAIN $OBE IOE IOE IOE IOE IOE IOE IOE IOE IOE IO$







Element	Details
	The second s
	A CONTRACT OF A
	and the second
	Example of rock armouring
Rolling grade	A knick is a shaved down section of trail, semicircular in shape and about 3 m in diameter, with
and knicks	the centre of the knick outsloped at about 15 % to draw the water off the trail. Rolling grade dips
	build on the knick feature. The knick is built and followed by a long gentle soil ramp. Rolling grade
Drainage	Drainage crossings are a critical element of trail design and construction in areas which may have
crossings	the greatest impact on water quality and the site where water has the greatest potential to
0	damage the trail.
	Where minor drainage crossings are required, low level platforms will be constructed, similar to
	the structures used on the All-Mountain Trail as well as the TVT, which have been constructed
	Drainage crossings will be low profile and located close to the ground, and therefore handrails are
	unlikely required. However, if handrails are required, the steel posts will be pile driven (to refusal)
	for each section of the fibreglass mesh tread and bearers be installed with the fibreglass mesh on
	top.
	Example of drainage
	1



Element	Details		
Half rule	A trail's grade shouldn't exceed half the grade of the sideslope (e.g. if the gradient of the side		
	slope is 20 %, the maximum allowable trail gradient would be 10 %). This will assist the sheeting		
	of water across the trail. If the trail grade is steeper than half the grade of the side-slope, it is		
	considered a fall-line trail (IMBA 2012).		
	and the second		
	Example of half rule		
10 % rule –	Generally, an average trail grade of 10 % or less is the most sustainable (IMBA 2012).		
average trail			
grade guideline	Marking trail boundaries with resks or vegetation to discourage users from sutting corpors or		
domarcation	from the desired path. Trail users will often gut corners through turns or around technical trail		
and anchors	features. This can negatively affect the sustainability of a trail. Demarcation or anchors are a		
	subtle way of keening riders on the intended line. This is achieved by placing natural elements		
	such as existing vegetation, rocks, logs or other natural landform or onsite materials. Strategically		
	selected and placed demarcations or anchors prevent trail widening and can offer a more		
	advanced features for more experienced riders (AusCycling 2019). This technique is only possible		
	in vegetated areas and not on disturbed ski runs as no natural anchors or demarcation is		
	available.		
Trail flow	Correct trail flow manages the riders speed and momentum through trail design and		
	construction. Consistent flow can minimise soil disturbance and displacement by reducing the		
	need for users to exert more downwards or sideways force to stay on the trail. The goal of this		
	element of trail design is to avoid abrupt changes and corners that are likely to make riders brake		
Cuede users	excessively or skid, which can result in braking bumps and trail widening.		
Grade reversals	A reverse in the trail grade, usually a short dip followed by a rise, creating a small watershed and forcing the water off the trail. Grade reversels make trails more enjoyable and provide swall art		
	drainage solutions. A grade reversal is the change in trail tread grade from up to down as the trail		
	moves across the side slope. Grade reversals allow water to leave the trail at the low point of the		
	grade reversal before it can gain enough speed and volume to cause erosion. Grade reversals		
	divide the trail into continuous small watersheds. This means the drainage feature of one part of		
	the trail won't affect another section, which reduces erosion (AusCycling 2019).		



Element	Details		
	Example of grade reversals		
Berms	A bermed corner has a banked outer edge that runs the entire length of the corner, allowing the rider to maintain a faster speed. Berms improve trail flow and reduce soil movement on corners. Berms help riders maintain speed without sliding out of the turn. Berms in conjunction with effective grade reversals provide effective drainage outlets.		
	<image/>		

Example of Berm



3.6.1 Environmental offset considerations

3.7 Disturbance

Trail length	BD1: 1740 m
	BD2: 1368 m
Trail tread	900-1200 mm
Trail corridor	BD1: up to 4m
	BD2: up to 3m
Construction	The construction corridor will be 10 m either side of the approved
corridor	alignment. The flexible construction corridor is to enable trail builders to
	respond to any unforeseen circumstances that may occur on site
	particularly in relation to environmental constraints where it may be more
	appropriate to go around an object rather than remove it, and to allow
	greater flexibility to meet relevant adaptive trail design requirements.
Initial disturbance to	Approximately 0.91 ha, refer to the Flora and Fauna Assessment (ELA
native vegetation	2025) for details.

The approximate disturbance for the Development is provided below:

3.8 Project timing

Construction is planned for the summer construction period 2024/25.

3.9 Operational details

The opening of the trail is planned for summer 2025/26. The trail will be operational during the Thredbo Mountain biking season (generally end of November to end of April each year).

During operation, ongoing monitoring and maintenance of the trail is critical to ensure effective and sustainable trail management. A maintenance and monitoring program will be implemented as part of the overarching Thredbo Mountain Bike Trail Management Plan. The plan sets out the management requirements and guides the maintenance works required to sustainably manage the Thredbo MTB Trail Network, as well as the monitoring and reporting requirements to effectively monitor the environmental condition of trails and their impact on the surrounding environment.

4 Legislation and Statutory Framework

4.1 Commonwealth legislation

4.1.1 Environment Protection and Biodiversity Conservation Act 1999

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) provides a legal framework to protect and manage nationally and internationally important aspects of the Australian environment. The EPBC Act is administered by the Department of Climate Change, Energy, the Environment and Water (DCCEEW). Under Part 3 of the EPBC Act, a person must not undertake an action (e.g. a development) that will have, or is likely to have, a significant impact on a protected matter (MNES), without approval from the Australian Government Minister for the Environment.

MNES that may occur, or relate to the search area (within a 5 km buffer) are provided in the EPBC Act Protected Matters Report within the appendices. An assessment of EPBC Act considerations and potential impacts is provided below.



Table 4: EPBC Act Considerations

EPBC Act Considerations	Comment		
MNES – World Heritage Properties	Not applicable		
MNES – National Heritage Places	No impact on the Australian Alps National Parks and		
	Reserves		
MNES – Wetlands of International Importance	No impact		
MNES – Great Barrier Reef Marine Park	Not applicable		
MNES – Commonwealth Marine Area	Not applicable		
MNES – Listed Threatened Ecological	The Flora and Fauna Assessment (ELA 2025) concluded		
Communities	the Development is unlikely to result in any significant		
MNES – Listed Threatened Species	impacts to these species.		
MNES – Listed Migratory Species			
Commonwealth Land	No impact		

An EPBC Act referral to the Commonwealth Environment Minister is not recommended as the Development is unlikely to have a significant impact on any MNES or Commonwealth land.

4.2 State legislation

4.2.1 Environmental Planning and Assessment Act 1979

Section 4.15 of the Environmental Planning and Assessment Act 1979 (EP&A Act) outlines matters that the consent authority is to take into consideration when determining a DA. A review of the Development against these provisions is provided below.

Table 5.	FP&A Act	Section 4 15	(1)	Matters	for	consideration
Tubic J.	LI GA ALL,	5000004.15	(-)	widters.	,01	consideration

EP&A Act, Section 4.15 – matters for consideration	Comment	
(a) (i) any environmental planning instrument	The Precincts – Regional SEPP is the only environmental planning instrument which applies to the site for this proposal. Refer to assessment in the next section.	
(ii) any proposed instrument	Not applicable. There are no draft Environmental Planning Instruments that are applicable to the Development.	
(iii) any development control plan	Not applicable. There are currently no development control plans applicable to the site.	
(iiia) any planning agreement	Not applicable. There are no planning agreements applicable to Thredbo under the Precincts – Regional SEPP.	
(iv) the regulations	The DA and supporting information has been prepared in accordance with the relevant requirements of the EP&A Regulation.	
(b) the likely impacts of that development	The likely impacts of the Development on the natural and built environment, and social and economic impacts in the locality have been assessed in this document.	
(c) the suitability of the site for the development	The site suitability has been addressed in this document.	
(d) any submissions made in accordance with this Act or the regulations	Consideration will be given to submissions made.	
(e) the public interest	The Development is considered to be within the public interest as it will enhance Thredbo's trail network and contribute to summer tourism.	



4.2.2 Biodiversity Conservation Act 2016

The purpose of the *Biodiversity Conservation Act 2016* (BC Act) is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ESD.

The *Biodiversity Conservation Regulation 2017* (BC Regulation) sets out threshold levels for when the BOS will be triggered, see below.

Table	6:	ВС	Reaulation	BOS	Triaaers

BOS Trigger	Comment
whether the amount of native vegetation being	Given the site is zoned C1 – National Park under
cleared exceeds the area threshold	the Snowy River Local Environmental Plan 2013,
	there is no minimum lot size. Therefore, the lot
	size allows for clearing up to 1 ha.
	The proposed clearing is below 1 ha, therefore
	area clearing threshold is not triggered.
whether the impacts occur on an area mapped on the	The Development will not occur in any BVM areas.
Biodiversity Values Map (BVM) published by the	
Minister for Environment	
the 'test of significance' in section 7.3 of the BC Act	The Development is unlikely to significantly affect
identifies that the development or activity is likely to	threatened species or ecological communities or
significantly effect threatened species or ecological	their habitats, refer to Appendix C.
communities, or their habitats	
the works are carried out on a declared area of	Not applicable.
outstanding biodiversity value	

4.2.3 State Environmental Planning Policy (Precincts – Regional) 2021

Development in the NSW alpine resort areas are subject to the provisions in Chapter 4 of the *Statement Environmental Planning Policy (Precincts - Regional) 2021* (Precincts – Regional SEPP). Consideration of the relevant provisions to the Development is provided below.

Table 7: Precincts – Regional SEPP, Chapter 4 Considerations

Precinct- Regional SEPP, Chapter 4	Comment
Section 4.2 Land to which Chapter applies	Thredbo Alpine Resort is listed as one of the Alpine
	Subregions on the State Environmental Planning
	Policy (Precincts – Regional 2021 Thredbo Alpine
	Resort Map referenced in Section 4.2.
Section 4.7 Land Use Table	The Development is recreation infrastructure which
	is a permissible use in the Land Use table, and
	therefore permitted development in Thredbo.
Section 4.9 Demolition	Not applicable
Section 4.10 Temporary use of land	Not applicable
Section 4.21 Heritage Conservation	The Development will not impact upon any heritage
	items or Aboriginal heritage items or places.
Section 4.24 Flood planning	The site is not located in a flood planning area and is
	not subject to flooding.
Section 4.25 Earthworks	The trails will be constructed utilising sustainable
(3)(a) the likely disruption of, or adverse impact on,	trail building techniques and temporary
drainage patterns and soil stability in the locality of	environmental controls will be implemented during
the development,	construction in accordance with the Site
	Environmental Management Plan, Schuss Advanced



Precinct- Regional SEPP, Chapter 4	Comment
	Mountain Bike Trails (KT 2024) (SEMP) to mitigate
	potential water quality and erosion impacts. As
	such, the Development is unlikely to adversely
	impact on drainage patterns and soil stability.
(b) the effect of the development on the likely	The Development will not impact upon the
future use or redevelopment of the land.	redevelopment of the site.
(c) the quality of the fill or the soil to be excavated.	The excavated material will be reused onsite. The
or both.	quality of the material is not expected to change.
(d) the effect of the development on the existing	The majority of adjoining land comprises of ski
and likely amenity of adjoining properties,	slopes, lifting infrastructure and mountain bike
	trails, therefore the Development is not expected to
	impact on amenity of adjoining properties.
(e) the source of any fill material and the destination	No fill material is proposed. In the event fill material
of any excavated material,	is required, it will be sourced in accordance with the
	requirements outlined in the SEMP.
(f) the likelihood of disturbing relics,	Unlikely, refer to Section 5.10.
(g) the proximity to, and potential for adverse	Impacts unlikely, refer Section 5.2.
impacts on, a waterway, drinking water catchment or	. "
environmentally sensitive area,	
(h) appropriate measures proposed to avoid,	The trails will be constructed utilising sustainable
minimise or mitigate the impacts of the	trail building techniques. Appropriate temporary
development.	measures will be implemented during construction
	to mitigate and manage potential impacts on the
	environment.
Section 4.26 Master plans	The Snowy SAP Master Plan is applicable to the site.
Section 4.28 Consideration of master plans and other	-
documents	
(1) In deciding whether to grant development	The Development is consistent with the objectives
consent to development in the Alpine Region, the	of Section 4.1, as demonstrated in this report.
consent authority must consider the following—	
(a) the aim and objectives of this Chapter set out in	
section 4.1,	
(c) a conservation agreement under the	Not applicable.
Environment Protection and Biodiversity	
Conservation Act 1999 of the Commonwealth that	
applies to the land,	
(d) the Geotechnical Policy —Kosciuszko Alpine	Refer Section 5.1.
Resorts published by the Department in November	
2003,	
(2) In deciding whether to grant development	The Development is consistent with the Snowy SAP
consent to development in the Alpine Region, the	Master Plan.
consent authority must consider—	
(a) a master plan approved by the Minister under	
section 4.26 that applies to the land, or	
(b) If a master plan has not been approved—a draft	
master plan prepared under section 4.26 that is	
intended to apply to the land and has been	
published on the NSW planning portal.	
Section 4.29 Consideration of environmental,	-
(1) (2) massures prepared to address costache's	No moscuros proposod to address contactorias
(1) (a) measures proposed to address geotechnical	iscuss, refer Section E 1
(b) the extent to which the development,	The Development does not require any measures to
b) the extent to which the development will	me Development does not require any measures to
(i) the conservation of the natural environment, and	on the conservation of the natural anvironment
m the conservation of the natural environment, and	on the conservation of the natural environment.



Precinct- Regional SEPP, Chapter 4	Comment
(ii) taking measures to mitigate environmental	
hazards, including geotechnical hazards, bush fires and flooding.	
(c) the visual impact of the proposed development,	The Development is not visible from the Main Range
particularly when viewed from the land identified as	Management Unit. Visual impacts considered
the Main Range Management Unit in the Kosciuszko National Park Plan of Management	acceptable within the context of the site and
(d) the cumulative impacts of development and	The impacts of the Development are addressed in
resource use on the environment of the Alpine	Section 5. With the implementation of appropriate
Subregion in which the development is carried out,	environmental controls during construction and
	operation, the Development is not anticipated to
	result in any significant adverse impacts on
	environmental values of the site and surrounds.
(e) the capacity of existing infrastructure and	The Development will not impact upon the capacity
Services for transport to and within the Alpine	to deal with additional usage generated by the
the development including in neak periods	Development
(f) the capacity of existing waste or resource	The Development will not impact upon the capacity
management facilities to deal with additional waste	of existing waste or resource management facilities.
generated by the development, including in peak	
periods.	
(2) For development involving earthworks or	Earthworks are proposed. Drainage, erosion and
stormwater draining works, the consent authority	sediment control measures will be implemented
must also consider measures to mitigate adverse	during construction in accordance with the SEMP to
impacts associated with the works.	arthworks. The trail will be constructed using
	sustainable trail building techniques.
(3) For development the consent authority considers	The Development will not alter the alpine resort
will significantly alter the character of an Alpine	character. The Development will contribute to
Subregion, the consent authority must also	sustainable year-round recreational opportunities.
consider—	
(a) the existing character of the site and immediate	
surroundings, and	
(b) now the development will relate to the Alpine	
Section 4 30 Kosciuszko National Park Plan of	The Development is not inconsistent with the
Management	Kosciuszko National Park Plan of Management.



4.2.4 Integrated development

Integrated development requires development consent and one or more of the approvals outlined in Section 4.46 of the EP&A Act. A review of the *Development referrals guideline* (DPIE 2021) has been undertaken to inform this Application. The Development is not integrated development requiring any of the approvals listed below.

Act	Trigger	Approval/Permit	Applicable (yes/no)
Water	Works within waterfront land	Controlled Activity	No
2000		Арргомаг	
Rural Fires Act	Bush Fire Prone Land; subdivision of land that	Section 100B, Bush Fire	No
1997	residential purposes or development of land for	Safety Authority	
	special fire protection purposes		
National Parks	Harming an Aboriginal object or declared	Aboriginal Heritage Impact	No
and Wildlife Act	Aboriginal place	Permit	
1974			
Fisheries	activities involving dredging and reclamation	Part 7 Fisheries	No
Management Act	work; activities temporarily or permanently	Management Act Permit	
1994	obstructing fish passage; using explosives and		
	other dangerous substances; harming marine		
	vegetation.		

Table 8: Integrated Development Considerations

4.3 Plans

4.3.1 South East and Tablelands Regional Plan 2036

The South East and Tablelands Regional Plan 2036 (Regional Plan) describes the vision, goals and actions that will deliver greater prosperity for those who live, work and visit the region. The Regional Plan promotes well planned, efficient and sustainable development that complements the area's natural and cultural values. In relation to the NSW Alpine Resorts, the Regional Plan seeks to promote year-round alpine tourism opportunities that will strengthen long-term resilience.

The Development will allow Thredbo to continue to meet the demands of the growing mountain biking community visiting the resort, which will contribute to continued visitation to the NSW ski resorts during the summer period.

4.3.2 Snowy Mountains Special Activation Precinct Master Plan 2022

The Snowy Mountains Special Activation Precinct Master Plan 2022 (Snowy SAP Master Plan) applies to the NSW Alpine Resort Areas, including Thredbo. The Master Plan seeks to facilitate a safe and sustainable increase in the amount and range of year-round recreation and accommodation offerings in anticipation of a future decline in snow-based recreation due to climate change and to address a sharply seasonal visitation profile (NSW Government, p.12).

The Development will allow Thredbo to diversity its recreational offerings, and continue to meet the demands of the growing mountain biking community visiting the resort through the provision of new recreational infrastructure.



4.3.3 Kosciuszko National Park Cycling Strategy 2017

The *Kosciuszko National Park Cycling Strategy* (OEH 2017) (KNP Cycling Strategy) was prepared for the management of cycling (on-road and off-road) within KNP. As demonstrated in subsequent sections, the Development will enhance the recreational and social values of KNP, whilst minimising potential impacts to the natural environment, therefore is considered consistent with the KNP Cycling Strategy.

5 Impact Assessment

The assessment for the development consisted of a desktop review of publicly available data sources. A preliminary site assessment was undertaken by KT Project personnel and various technical consultants to validate the desktop assessment results, inform the design process and ensure appropriate environmental controls are implemented to avoid, mitigate and/or management potential impacts on environmental and cultural values.

5.1 Geotechnical considerations

A review of the Geotechnical Policy Kosciuszko Alpine Resorts (DIPNR 2003) was undertaken to inform the planning of this Development. The site is partially located within the designated "G" on the accompanying geotechnical maps for the Kosciuszko Alpine Resort areas (**Figure 7**).

The Development will comprise minor earthworks, not involving excavation or fill in excess of one metre in vertical height and no structures are proposed, therefore in accordance with Section 3.1 of the Geotechnical Policy a geotechnical report is not required. Trail stability is managed through the implementation of sustainable trail construction principles. No further assessment of geotechnical matters is required.



Figure 7: Geotechnical policy mapped areas (NSW Planning Spatial Viewer 2024)



5.2 Soil and water

The Development will be constructed to effectively manage erosion and run-off in accordance with sustainable trail design concepts and construction techniques such as rolling contours, outslope, the half rule and 10% average guideline and use of frequent grade reversals to minimise erosion and soil stability risks. Where areas of disturbance do not form part of the final trail alignment, they will be stabilised and/or revegetated in accordance with the rehabilitation and monitoring which will assist in achieving an erosion resistant state.

The Development is not located within 40 m of any watercourses (refer **Figure 8**). No further assessment is required.



Figure 8: Waterfront land considerations

5.3 Biodiversity

The Flora and Fauna Assessment (ELA 2025) (Appendix C) concluded:

- No threatened flora species were recorded within the study area during the survey period and none are considered likely to occur there given the general absence of suitable habitats.
- The study area does not support any endangered ecological communities.
- Approximately 0.89 ha of Subalpine Woodland and 0.02 ha of Tall Subalpine Heath is expected to be removed in association with the Development.
- The Development is unlikely to have a significant effect on threatened species, populations or ecological communities or their habitats.
- The Development is unlikely to have a significant impact on MNES or Commonwealth land, and a referral to the Commonwealth Environment Minister is not necessary.



5.4 Socio-economic

KT have been developing mountain bike trails within the resort since the 1990s. Consequently, the level of understanding of the existing landscape and industry will ensure that the trails are designed and constructed to comply with best practice environmentally trail design principles; and provides targeted mountain biking objectives and difficulty with consideration of the natural, social and operational setting.

Whilst the Development will result in ongoing trail maintenance costs, the economic impacts will be largely positive as the trails will contribute to improved economic stability for the resort through the provision of an enhanced trail network which will cater to a broader range of mountain bikers and boost summer visitation. The Development will also provide construction and ongoing operational jobs. The Development is therefore considered to be within the public interest.

5.5 Visual impacts

The site and surrounds comprise native vegetation, lifting infrastructure, ski runs and associated infrastructure, MTB trails and access tracks. Parts of the trails will be visible from the Merritts Gondola above. The tread of the trail is shaped using natural materials (rocks and soil) to provide features that blend within the existing landscape. The Development will not alter the character of the resort as it will form part of the Thredbo trail network.

5.6 Air quality

Dust can be a nuisance and decrease the amenity value of an area. Dust may be generated during construction from activities such as vegetation clearing, earthworks and vehicle movements. There are no sensitive receptors located within the locality. With the implementation of appropriate controls during construction, potential impacts can be mitigated.

5.7 Noise

There are no sensitive land uses within close proximity of the site. It is proposed construction hours of works will be undertaken during standard working hours. This includes 7:00am – 6:00pm Monday to Friday, 8:00am – 1:00pm Saturdays, and no work on Sundays or public holidays. Out-of-hours works are not anticipated. With the implementation of appropriate controls, potential noise impacts can be mitigated.

5.8 Access and traffic

The Development traverses the Lower All-mountain, Sidewinder and links onto the proposed Merrritts Intermediate Trail (subject to development approval). Temporary closures of these trails may be required during construction. All closures will be managed in accordance with the SEMP.

5.9 Heritage

The Development will not impact on any heritage items or places listed in Schedule 4 (Heritage Items – Chapter 4) of the Precincts – Regional SEPP.

5.10 Aboriginal cultural heritage

To establish due diligence for the Development, an assessment against the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010) is provided below.



Table 9: Aboriginal Cultural Heritage Due Diligence Process

Du	e Diligence Process	Comment
1.	Will the activity disturb the ground surface or any culturally modified trees?	The Development will result in ground disturbance. No cultural modified trees were identified within the site.
2. a)	Are there any: relevant confirmed site records or other associated landscape feature information on AHIMS? And/or	No confirmed records are located within the Development site, refer to Appendix B for the AHIMS search results.
b)	any other sources of information of which a person is already aware? And/or	Several historical independent assessments have been undertaken within the resort. All studies provide an indication that the ski slope areas have low archaeological potential due to the level of disturbance associated with the previous ski slope work. The studies also concluded that given the steepness and exposed aspect/lack of sheltering tors, the ski slopes are unlikely to have been favourable campsite locations (NGH Environmental 2017; Past Traces Heritage Consultants 2017; Iron Bark Heritage 2013; URS Australia 2004, 2005). Past Traces (2018) undertook a Due Diligence
		Assessment for the replacement of Merritts chairlift in 2018 which is relevant to the site locality. The site assessment confirmed the mid slopes hold low potential for unrecorded heritage sites or subsurface deposits based on modelling for the region. Previous construction works in the locality associated with lifting infrastructure, mountain bike trails, access tracks and snowmaking infrastructure have removed and/or impacted on top and sub soils (Past Traces 2018).
c)	landscape features that are likely to indicate presence of Aboriginal objects?	There are no landscape features within the Development site that would indicate the presence of Aboriginal objects. The site is generally steep with exposed aspects. Parts of the site have been previously disturbed through earthworks associated with installation of the Merritts Gondola infrastructure, construction of access tracks and MTB trails in the locality. It is considered the Development has low potential to impact on unrecorded Aboriginal objects or sites. There is no requirement to move onto Steps 3 and 4.
3.	Can harm to Aboriginal objects listed on AHIMS or identified by other sources of information and/or can the carrying out of the activity at the relevant landscape features be avoided?	Not applicable.
	confirm that there are Aboriginal objects or that they are likely?	

The assessment concludes an AHIP is not necessary. The works may proceed with caution. Where unexpected items of potential archaeological, built, or Aboriginal cultural heritage significance are discovered, construction staff/contractors to follow the 'Unexpected Finds Procedure' outlined in the SEMP.



5.11 Waste management

The Development is expected to generate minimal waste. Storage and disposal of construction waste will be managed in accordance with the SEMP.

6 Conclusion

This application is seeking development approval for the construction of two advanced MTB trails within Thredbo Alpine Resort. In accordance with the requirements of the EP&A Act, EP&A Regulations and Precincts – Regional SEPP, this SEE has assessed the potential impacts of the Development on the human, built and natural environment of the subject site and surrounds. With the implementation of appropriate controls during construction and operation, the environmental impacts of the Development are considered acceptable.

The Development is considered to be within the public interest as it will enhance Thredbo's trail network and contribute to summer tourism.

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8 Appendices

Appendix A Trail Description and Photo Reference Points



Appendix B Desktop Search Results



Appendix C Flora and Fauna Assessment