

# Aboriginal Cultural Heritage Due Diligence Assessment Thredbo Snowmaking Pond Upgrades



Report Prepared for Kosciuszko Thredbo Pty Ltd

Date: 10/06/2025

## Document Control

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V1	10/06/2025	N. Cracknell	L. O'Brien

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## EXECUTIVE SUMMARY

This report provides Aboriginal heritage due diligence advice for the proposed upgrades to the Thredbo snowmaking ponds located within Lot 876 DP1243112. The area is currently used as part of the Thredbo snowmaking ponds located to the east of the Thredbo River and Thredbo Village. These ponds were excavated in the mid-1960s to support the development and snowmaking of the Thredbo ski slopes. The area has been highly impacted by the construction of the existing ponds, associated infrastructure and ongoing use of the area. The study area is shown on Figure 1 in a regional context with details of the proposed works in Figure 2.

This Due Diligence heritage assessment has been undertaken in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010a).

The proposal would involve the following impacts:

- ❖ Widening of the existing water corridor to 2.5m width in two proposed areas (Stages 1 & 2).
- ❖ Movement of plant/excavation materials from the access road to the works areas.

No heritage sites or areas of Potential Archaeological Deposit (PAD) were identified within the project area based on a review of previous reports and field survey of the project area.

Field survey was undertaken across the project area in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b). The field survey covered areas of the proposed widening and the surrounding area. Ground visibility was low at the time of field survey with extensive vegetation coverage and few small exposures. The field survey did not identify any heritage sites or areas of potential.

As a result of the field survey and background research completed for the project, the following recommendations have been developed:

- ❖ The development proposal should be able to proceed with no additional archaeological investigations. No areas of potential archaeological deposits or heritage sites have been identified within the development area and the potential for Aboriginal or historical heritage objects within the development area has been assessed as low.
- ❖ All Aboriginal objects are protected under the *NSW National Parks and Wildlife Act 1974*. It is an offence to disturb an Aboriginal site without a consent permit issued by NSW Heritage. Should any Aboriginal objects be encountered during works then works must cease and the find should not be moved until assessed by a qualified archaeologist.
- ❖ In the unlikely event that human remains are discovered during the construction, all work must cease. NSW Heritage, the local police and the appropriate Local Aboriginal Land Council (LALC) should be notified. Further assessment would be required to determine if the remains are Aboriginal or non-Aboriginal.
- ❖ Further archaeological assessment would be required if the proposal activity extends beyond the area of the current investigation.

# 1 INTRODUCTION

This report provides Aboriginal heritage due diligence advice for the proposed upgrades to the Thredbo snowmaking ponds located within Lot 876 DP1243112. The area is currently used as part of the Thredbo snowmaking ponds located to the east of the Thredbo River and Thredbo Village. These ponds were excavated in the mid-1960s to support the development and snowmaking of the Thredbo ski slopes. The area has been highly impacted by the construction of the existing ponds, associated infrastructure and ongoing use of the area. The study area is shown on Figure 1 in a regional context with details of the proposed works in Figure 2.

The proposal would involve the following impacts:

- ❖ Widening of the existing water corridor to 2.5m width in two proposed areas (Stages 1 & 2).
- ❖ Movement of plant/excavation materials from the access road to the works areas.

These works are high impact and would have a negative impact on any heritage located within the project boundary. Heritage sites may be located on the surface or subsurface in areas of high potential for the preservation of archaeological remains of historical events or past usage by Aboriginal groups.

To assess the potential impacts of the proposed works on heritage this Due Diligence Heritage Assessment has been undertaken.

This report, field survey and associated research has been conducted in accordance to the requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (OEH 2010).

## 1.1 PROJECT OBJECTIVES

The due diligence assessment is being undertaken to complete the following objectives:

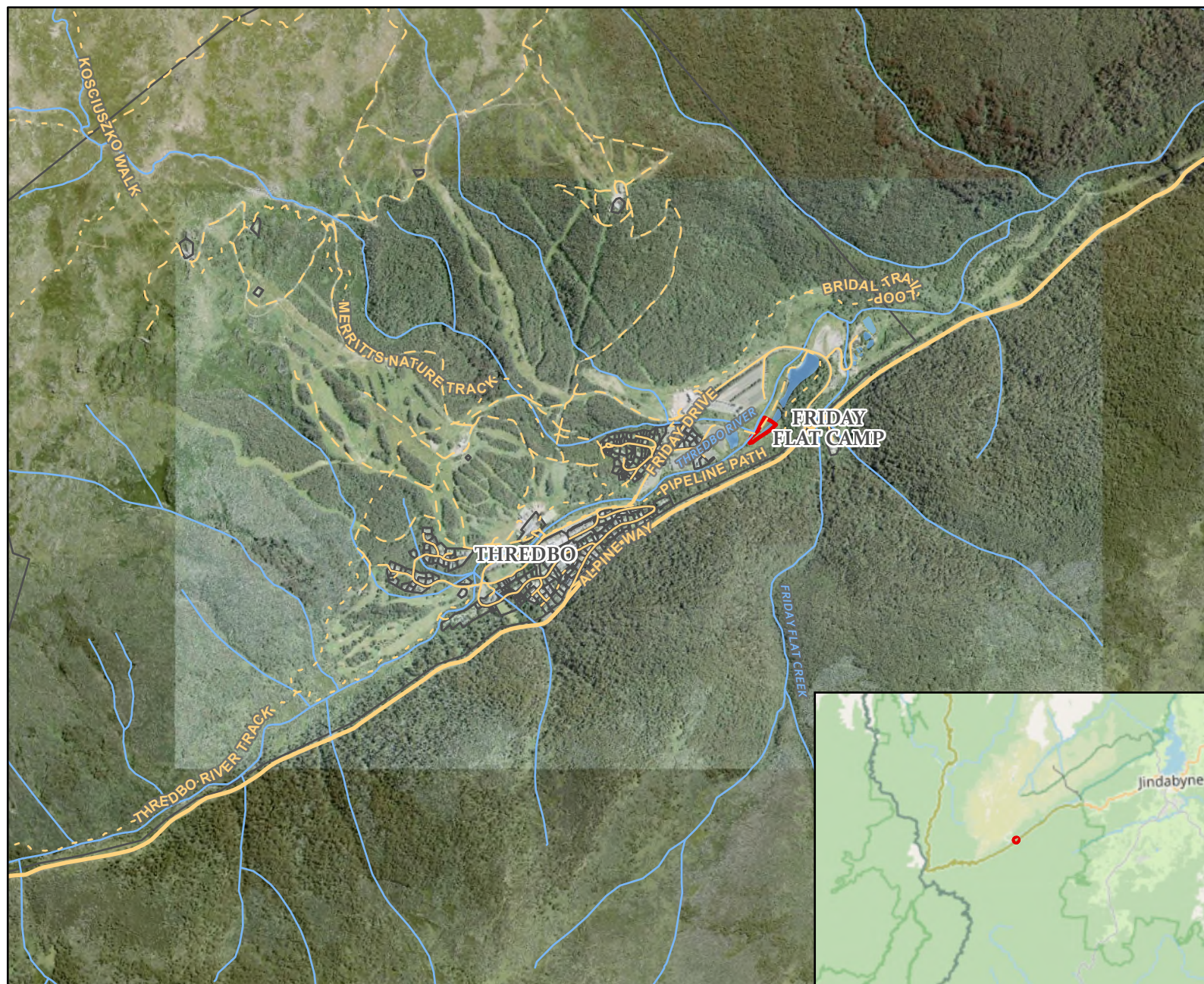
1. Review of the NSW Heritage Aboriginal Heritage Information Management System (AHIMS), to identify any recorded Aboriginal heritage sites within the project area.
2. Review of historic registers to identify any historic heritage.
3. Review of previous reports in area to develop predictive model of site location
4. Assess landforms present in project area against predictive model to determine potential for heritage sites and determine level of disturbance
5. Complete site visit to visually inspect impact areas or areas assessed as holding potential based on predictive model and record any identified heritage sites. The site visit will also document levels of disturbance within project area.
6. Complete due diligence report with management recommendations to avoid or minimise impacts within the project area.

## 1.2 ABORIGINAL CONSULTATION

Due to the limited scope of the proposed works, and no previously recorded sites recorded in the vicinity, no consultation with the local Aboriginal community has been undertaken. Consultation with the Aboriginal community is not a requirement of the Due Diligence Code of assessment, which is undertaken at the preliminary planning stage of the project.









If the assessment finds that impacts to Aboriginal heritage will occur as a result of the development then consultation will be undertaken with the Local Aboriginal Land Council (LALC) and the wider Aboriginal community, in accordance with the consultation guidelines required by NSW Heritage.





**Figure 1: Regional Context**

**Legend**

-  Watercourse
-  Major Road
-  Minor Road
-  Track
-  Path
-  Project Area
-  Cadastre
-  Waterbody



1:24,000

0 290 580 1,160  
Meters

Coordinate System:  
GDA2020 MGA Zone 55

Imagery: © Nearmap

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Rev.	Description	Date	Init.	Checked	Date
1.	ISSUE FOR DA	11/04/2025	JB		
2.					
3.					

THREDBO ALPINE RESORT



THREDBO UPPER  
SNOWMAKING POND  
CHANNEL WIDENING

Drawing Number:	1. SITE PLAN
Project Number:	24024ENG
Scale:	1:2000 @A3
Drawn By:	Jack Barr



## 2 DESKTOP ASSESSMENT RESULTS

### 2.1 HISTORICAL HERITAGE SEARCH

Within NSW Local government is responsible for managing heritage items. This responsibility is mainly fulfilled by listing heritage items in the Local Environmental Plans (LEPs) under the *Environmental Planning & Assessment Act 1979*. Council approval is required to impact any listed item.

Heritage items can also be of 'state significance' in which case they are listed on the NSW Heritage Register by the NSW Heritage Council under the *Heritage Act 1977*. These items are usually substantial and consist of buildings, bridges or other structures that represent events in the local area.

A search of the NSW Heritage Register and the Snowy River LEP 2013 was undertaken for the project. No historical items were located during these searches. A review of historical parish maps was also undertaken with no known structures or items identified within the project area.

### 2.2 PREVIOUS HERITAGE STUDIES

An extensive number of heritage studies have been undertaken in the immediate area of the Thredbo Valley. These have been mainly small scale and development focused. Studies covering a larger area and generating models of occupation have been undertaken in the Perisher Valley (NOHC 2000) and Thredbo (Ironbark 2013). A review of this large body of work has been undertaken to provide context and site location modelling for the project area. The most relevant reports for the current project are summarised below from this large body of work.

Paton (1985) completed a survey along the Thredbo River valley between the Ranger Station and Dead Horse Gap for the Alpine Way upgrade. This survey covered a range of differing landforms located on site on area of level ground amongst spur line. A locational model of site location on level areas was theorised.

Walkington (1988) completed a survey for a proposed 33kV powerline from Bullocks Flat to Thredbo identifying 11 artefact scatters and two isolated finds. Almost all of the sites found were situated on gently sloping ground such as spurs elevated above the river.

Paton (1988) surveyed the Thredbo Valley for a fibre optic cable route again crossing differing topographies in the area. Paton located a further two site during this assessment which supported his earlier location model.

Fuller (1988) completed a survey of the proposed development areas in Thredbo Village recording seven archaeological sites all consisting of isolated finds or small artefact scatters. The sites were located on level areas on basal and midslopes. Fuller concludes that all of the sites are typical of high-altitude sites in being low-density artefact scatters (1988:7).



Navin and Officer completed two surveys of the Thredbo valley, one for the Alpine Way in 1992 and the other for the Thredbo Alpine Village in 1994. A number of small sites were located, conforming to the site models being isolated finds or small artefact scatters located on level areas or gradual slopes within basal contexts.

Dearling (1997) surveyed a 2-hectare area, for a proposed ski run at Thredbo. He located one site (#61-6-103), which consisted of five artefacts. It was situated on a cleared service road on the crest of a spur in a minor saddle with Merritt's Creek to the south and an unnamed creek to the north. The level location and proximity to creek lines again conform to the modelling for the region. This site is the closest to the current project area but well outside of any area of impact.

NOHC in 2000 completed a large scale and extensive field surveys and subsurface testing of landforms for the Perisher Blue Ski Resort. This study resulted in the development of a site location model which is equally applicable to the Thredbo region as similar topography and landscape features are present. Navin Officer Heritage Consultants concluded that the strongest site determinants were:

- Relatively level, well drained ground
- Shelter from prevailing weather patterns (mainly from the west and northwest)
- Avoidance of cold air drainage contexts
- Preference for terrain which facilitates pedestrian access and through travel
- Proximity to exploitable resources such as open woodland, grassland and herb fields and Bogong moth aestivation sites (2000:41).
- Majority of sites would be small artefact scatters of less than 15 artefacts, found throughout landscape
- Larger sites (minority) would be located on crests of ridges and major spur lines or more commonly on basal valley slopes. The larger sites decreased in artefact density the higher the location from the basal slopes (NOHC 2000:41).

Dibden (2003) completed a survey of proposed upgrade works for Antons and Sponnars T-bars at Thredbo. No sites were found, due to previous disturbance from clearing, land modification for grooming of ski slopes and the fact that the study corridor was located on steep, mid to upper slopes with low archaeological potential (2003:1).

Aecom (Formerly HLA) throughout 2004 and 2005 completed a series of survey and excavations for a proposed works depot at Friday Flat, located on level basal slopes and within a recorded site location (NOHC 1992). The excavations were placed in six differing locations and recovered 99 artefacts.

Grinsbergs (2008) completed a survey for the proposed multi-use trail from Bullocks Flat to Thredbo along the Thredbo Valley floor, which identified 21 sites, comprising 11 artefact scatters, nine isolated artefacts and a grinding groove as well as two areas of potential archaeological deposit. Based on the site locations Grinbergs concludes that general model of site location with sites on level areas in basal contexts and not located on slopes was applicable.

Ironbark Heritage (2013) completed a due diligence assessment for the Thredbo Mountain Bike Trails which included the development of a GIS Slope analysis model. This assessment showed slopes of



more than 10 degrees as not being conducive to Aboriginal usage and holding low potential for sites and subsurface deposits. This study included the current project area through which the trail passes.

NGH (2017) completed an Aboriginal heritage due diligence assessment for the Thredbo Mountain Bike Trails covering three new trail locations. The terrain features within the project area were mostly steep slopes, with few potential areas of sensitive landforms. No sites or areas of potential were identified, and the study concluded that the potential for the presence of Aboriginal sites is low due to the level of disturbance associated with previous ski slope work and the general steepness of the terrain.

Past Traces Pty Ltd (2018) completed three heritage assessment for the Thredbo Alpine Resort in regard to the upgrade and redevelopment of the Merritt's Mountain House Restaurant Thredbo NSW, the extension of visitor car park facilities at Friday Flat at Thredbo and the demolition and construction of a new building complex (retail/hospitality) on the site of the Thredboland building. All these three assessments did not locate any Aboriginal heritage sites or areas of Potential Archaeological Deposit (PAD) within the area.

OzArk (2021) completed the regional assessment of the Snowy Mountains Special Activation Precinct (SAP). The assessment area covered 72,211ha of which 330 were surveyed. One of these areas at Thredbo included the eastern portion of the current project area. No sites were identified with a general ranking of low potential based on gradient with moderate to high areas mapped on the eastern end on the flatter river flats close to Thredbo River. These areas will not be impacted by the current works.

Past Traces in 2023 conducted an assessment for the proposed upgrade to the Snowgums Chairlift to provide increased capacity and quality infrastructure. The project area was located predominately within the existing impacted Snowgums Chairlift corridor, at Thredbo, NSW on steep slopes. Based on the models of site location the areas were classified as low potential and this assessment did not identify any new heritage sites or areas of PAD.

In 2024, Past Traces undertook a cultural heritage assessment for the proposed rehabilitation of the Thredbo Sewer Trunk Main, located within the Thredbo Village. These works would include the removal of vegetation and excavation along 50m of the pipe's alignment, as well as the repair and reinstating of 15 existing manholes. The field survey covered the pipeline alignment, with particular focus on the trees listed for removal and the degree of previous disturbance. Despite high ground surface visibility at the time, the field survey identified no Aboriginal heritage sites or areas of potential due to the steepness of the landforms, located on low potential landforms and the high degree of previous impacts along the pipeline route.

### 2.2.1 Predictive Model

The following predictive model has been developed for the project area (Table 1). The project impact area is limited in size and confined to low slope creek flats.



This site prediction model is based on:

- ❖ Site distribution in relation to landscape features within the project area
- ❖ Consideration of site type and densities likely to be present within the project area
- ❖ Slope gradients based on Ironbark (2013) and NOHC (2000).

Table 1. Site Prediction Model

Probability	Site Type	Definition	Typical Landform	Assessment
Low	Isolated finds and surface scatters of stone artefacts	Stone artefacts ranging from single artefact to high numbers	Most likely in proximity to creek lines and river flats	High levels of previous impact Project area is adjacent to a 3 <sup>rd</sup> order stream (Thredbo River)
Low	Potential Archaeological Deposits (PADs)	Area considered on landform to hold higher potential for unidentified subsurface deposits	Varies, but most frequent on elevated terraces along creek lines and river frontage.	High levels of previous impact Project area is adjacent to a 3 <sup>rd</sup> order stream (Thredbo River)
Nil	Culturally Modified Trees (CMTs)	Trees which have been modified by scarring, marking or branch twining	Wherever old remnant trees remain	Alpine species not applicable and no old growth trees remain.
Nil	Rock Engravings	Images engraved on flat rock surfaces	Escarpments, rock platforms or rock shelters	Not present
Nil	Stone arrangements	Arrangements of stones by human intention, including circles lines or patterns.	Any landform	High levels of previous impact and ongoing use suggest unlikely these sites would remain and none are previously recorded.
Nil	Stone quarries/Ochre sources	Quarry sites where resources have been mined.	Any landform	Not present based on geology.
Nil	Axe grinding grooves	Grooves in stone caused by the grinding of stone axes	Usually in creek lines, as water is used as abrasive with sand.	None previously recorded.
Nil	Burials	Burials of Aboriginal persons	Usually requiring deep sandy soils on eastern facing slopes	Relevant soils not present. None previously recorded.

### 2.3 ABORIGINAL HERITAGE INFORMATION MANAGEMENT SYSTEM (AHIMS) SEARCH

A search of the NSW Heritage AHIMS database was undertaken on the 18 November 2024 covering the approximate 1km surrounding area centred on the project area. The extensive search revealed previously recorded heritage sites (n=22) within the surrounding 1km. One site, an isolated find, is nearby the project area. No previous heritage sites have been located within the Project Area.

The sites located in this 1km area are provided in Table 1 and consist of isolated finds, artefact scatters, and one area of PAD and conform to the wider site predictive model for the Thredbo Valley/Kosciusko area (NOHC 2000, Grinsbergs 2008, Ironbark 2013, OzArk 2021). This model predicts a site location model of small sites located on level ground in proximity to water sources, or on level areas of spur lines, saddles and ridge crests amongst mountainous areas. This predictive model is discussed in more detail in Section 2.2. The location of previously recorded sites within 1km of the project area are shown in [REDACTED]

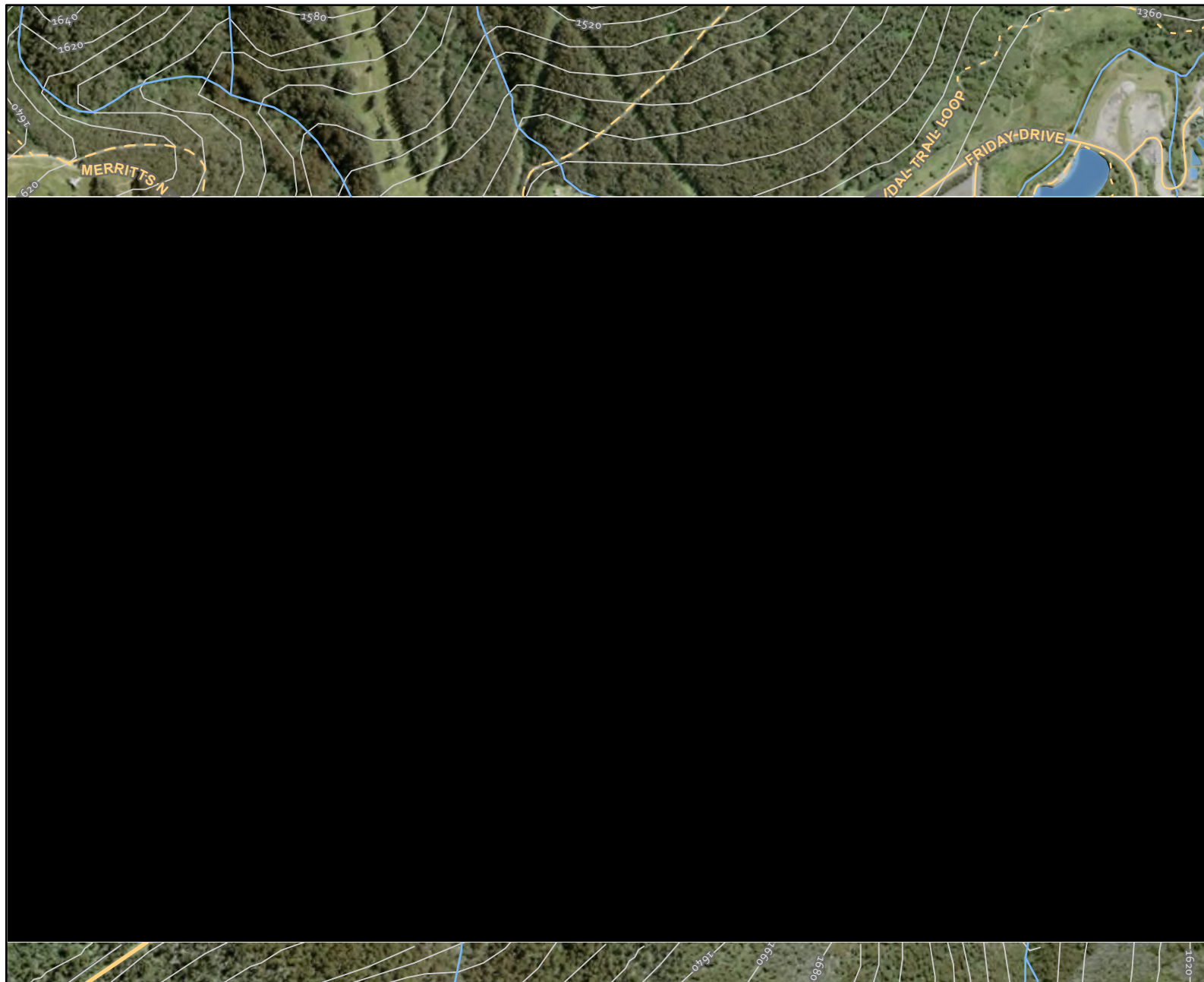
[REDACTED]. This site consists of an isolated find in an area of level ground within along the midslope creekflats. This site will not be impacted by the proposed works.

Table 2. AHIMS Site Types

Site Type	Number	Percentage
[REDACTED]	1	5%
[REDACTED]	1	5%
[REDACTED]	1	5%



Figure 3: AHIMS

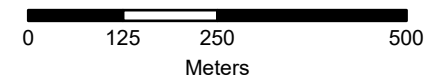


Legend

-  
-  Contour - 10m
-  Watercourse
-  Major Road
-  Minor Road
-  Track
-  Path
-  Project Area
-  Cadastre
-  Waterbody



1:10,000



Coordinate System:  
GDA2020 MGA Zone 55

Imagery: © Nearmap

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## 2.4 LANDFORM AND DISTURBANCE LEVEL ASSESSMENT

The landforms within the project area consist of low slopes and creek flats. Water sources are present in the form of drainage lines which feed into the Thredbo River (a central 3<sup>rd</sup> order river) at the base of slopes, with its confluence with Friday Flat Creek located 500m to the northeast. The Thredbo River would provide a consistent source of water for most of the year and would likely continue to exist as a chain of ponds during long periods of drought.

The project area has been heavily impacted by the development of Thredbo Village, ski slopes and ongoing use and maintenance of the facilities. The area was initially excavated in the mid-1960s to support the construction of the Thredbo village and the snowmaking for the ski slopes. As part of the construction of these snowmaking ponds, a section of the Thredbo River was diverted further west and a rock weir with sluice gate installed to allow for the controlled flow of water into the excavated snowmaking ponds when needed. As a result of these previous works, the snowmaking ponds have been highly impacted with likely no original banks remaining.

As a result of the landform assessment the study area contains low potential to contain any unrecorded heritage sites or areas of PAD and has suffered a high degree of previous impact. An aim of the field survey will be to investigate the potential of the landforms, along with the degree of disturbance to verify the desktop findings.



### 3 FIELD SURVEY RESULTS

A field survey of the project area was undertaken on the 29<sup>th</sup> May 2025 to verify the findings of the desktop review of landforms and disturbance. The aim of the investigation was to identify heritage objects or places of potential archaeological Deposit (PAD). Based upon the background research, known Aboriginal site patterning, and current aerial photography, the areas of the proposed water channel widening and surrounding landforms were inspected.

All surveyed areas and items of interest were recorded on a topographic map of the study area (using a GPS and GDA94 MGA55 coordinates), along with levels of visibility, erosion, soil conditions, and evidence of land disturbance.

Ground surface visibility (GSV) is the percentage of ground surface that is visible during the field inspection. GSV increases in areas of exposures such as stock impact trails, roads, gates and along areas of erosion such as creek banks and dam walls. As a result surveys undertaken in areas with high exposure rates result in a more effective survey coverage.

The site visit resulted in the following findings.

#### 3.1.1 Ground Surface Visibility

GSV over most of the study area was low due to dense vegetation coverage across the water channel's banks. Bare earth was visible in small erosional and animal impact exposures and across the project area the average GSV was estimated at <20%. Due to the prevailing vegetation, areas of exposure were infrequent and limited to the western bank, with visible ground present under the adjacent trees, animal impacts and bank erosion.

The conditions at the time of the field survey are shown in plates 1 to 6.



Plate 1. Southern portion of channel to be widened for Stage 1 (facing northeast)



Plate 2. Area to be widened for Stage 1 (northeast)



Plate 3. View across area to be widened for Stage 2 from west bank (southeast)



Plate 4. View across northern area to be widened for Stage 2 (northeast)



Plate 5. Current channel width with heavy sediment and vegetation buildup (north)



Plate 6. Upstream weir sluice gate at entrance to snowmaking ponds (east)

### 3.1.2 Disturbance

The degree of disturbance across the study area was very high. The area was initially excavated in the mid-1960s to support the construction of the Thredbo village and the snowmaking for the ski slopes. As part of the construction of these snowmaking ponds, a section of the Thredbo River was diverted further west and a rock weir with sluice gate installed to allow for the controlled flow of water into the snowmaking ponds when needed. As a result of these previous works, the channel and banks of the snowmaking ponds have been highly impacted with no original banks remaining.

The western side of the ponds has been built up above the water level to prevent flooding and a vehicle access track constructed. The channel itself features a concrete base in areas and features significant sediment and vegetation buildup since its construction.

The manufactured nature of the landforms indicates that no subsurface deposits are present. Disturbance across the remainder of the project area remains high with disturbance present in the form of prior vegetation and tree removal, excavation and importation of materials and significant



landscaping. The locations of the proposed water channel widening are not located on high potential landforms and these areas are considered to hold low potential for heritage sites due to the high levels of previous disturbance.

### 3.1.3 Results - Aboriginal Heritage Sites

No areas of Aboriginal heritage were identified during the field survey. No known heritage sites will be affected by the proposed development.

### 3.1.4 Results - Areas of Potential Archaeological Deposit (PAD)

Areas of PAD are defined as landforms that hold higher potential than their surrounds to contain subsurface deposits of past Aboriginal occupation. Based on a review of previous studies completed for the region, areas of PAD would be located in association with waterways (1<sup>st</sup> or 2<sup>nd</sup> order streams) on level ground or along spur crest and ridge lines.

As a result, of the landforms and prior impacts, no areas of PAD have been identified and the project area is considered to hold low potential.

### 3.1.5 Results – Historical Heritage

No areas or items of historical heritage were identified within the project area as a result of the background review or field survey.

### 3.1.6 Summary

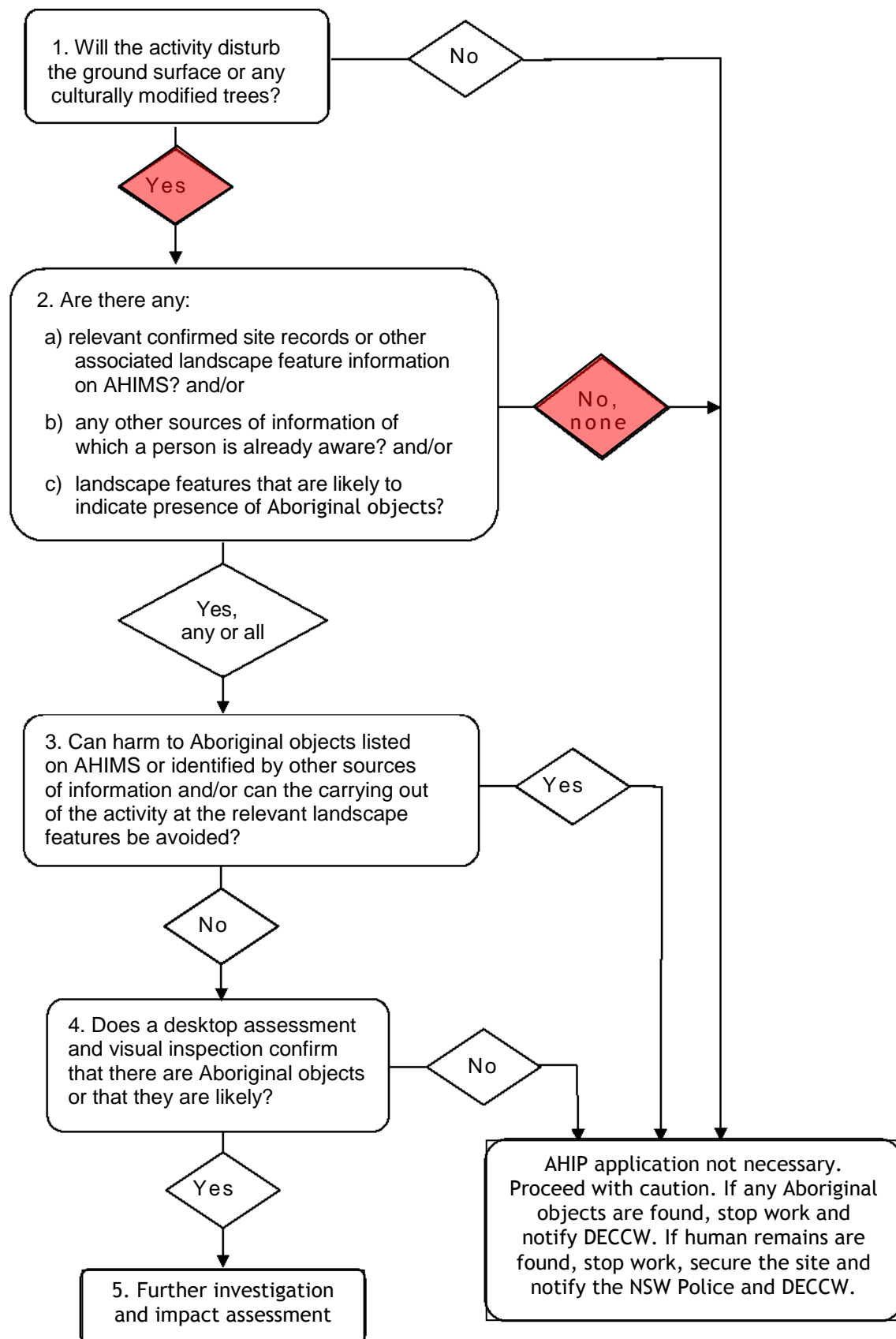
As a result of the site visit, field survey of impact areas and background research, it is considered that the project has low potential to impact on unrecorded Aboriginal or Historical heritage sites or areas of PAD. No Aboriginal heritage sites or areas of PAD were recorded or identified as a result of the assessment and no areas of high or moderate sensitivity are present in the development area based on previous research, modelling and the field survey assessment of disturbance and soils.

Based on the assessment the impacts from the project are as follows:

- ❖ No known Aboriginal objects or places will be impacted by the proposed works.
- ❖ No known Historical objects or places are present in the project area.
- ❖ No areas of high potential to contain unrecorded Aboriginal or historical objects or places are present in the project area.

The Aboriginal Due Diligence Code provides a flowchart of six questions to identify the presence of and potential harm to Aboriginal heritage. These questions and their applicability to the project are shown in Figure 4. The responses to these questions determine if further heritage investigations are required.

Figure 4. Due Diligence Flow Diagram (OEH 2010:10 – Due Diligence Code of Practice)





## 4 RECOMMENDATIONS

Based on this due diligence assessment the following actions are recommended for the project.

Recommendation 1: Works to proceed without further heritage assessment with caution.

The proposed works can proceed without further assessment as no Aboriginal or historical heritage sites (objects or places) have been identified within the project area. The potential for impacting on unrecorded heritage sites within the project area is assessed as extremely low, based on landform analysis and field survey.

Recommendation 2: Discovery of Unidentified Aboriginal cultural material during works.

Under the *NPW Act 1977* all Aboriginal places and objects are protected from harm, even if they have not been previously identified during the assessment process. If Aboriginal material is discovered during works then the steps as outlined below should be followed:

- ❖ All work must cease in the vicinity of the find and project manager notified immediately.
- ❖ A buffer zone of 10m should be fenced in all direction of the find and construction personnel made aware of the 'no go' zone.
- ❖ NSW Heritage must be notified of the find and advice sought on the proper steps to be undertaken.
- ❖ After confirmation with NSW Heritage a heritage consultation should be engaged to undertake assessment of the find and provide appropriate management recommendations to the proponent.

Recommendation 3: Discovery of Human Remains

In the highly unlikely event that human remains are discovered during any construction work, than all activity in the vicinity of the find must cease. As a first step the local police must be notified, followed by NSW Heritage and advice sought on appropriate next actions. No work can continue on the site until cleared with police and NSW Heritage.

Recommendation 4: Alteration of impact footprint

Further archaeological assessment would be required if the proposal activity extends beyond the area of the current investigation.

Implementation of the above management recommendations will result in low potential for the project to impact on heritage values or result in damage to heritage sites.

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## A.1 AHIMS SITE SEARCH



