



Statement of Environmental Effects

Playground Mountain Bike Trail *Application for use of trail*

Thredbo Alpine Resort, 2 Friday Drive, Thredbo NSW 2625

June 2025

Document Control

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Project: 23009MO

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1 Introduction

This Statement of Environmental Effects (SEE) has been prepared to support the Development Application (DA) for the use of the Playground Mountain Bike Trail (hereinafter referred to as the Development). The Applicant for the DA is Kosciuszko Thredbo Pty Ltd (KT) (ABN 95 000 139 015).

The Development site is located within the Cruiser ski area adjacent to/below the Cruiser chairlift within the Playground ski run. Easy Rider, Paparazzi and Grasshopper MTB trails are located within close proximity of the site. The site is within the Thredbo Head Lease Area on land formally described as Lot 876 DP1243112.

1.1 Previous approvals applicable to the site

The trail was approved under DA 24/966 on 14 March 2024 and constructed in summer 2024/25. A map showing the approved alignment is depicted in **Appendix A**.

2 Purpose of application

On 5 February 2025 KT notified the Department of Planning, Housing and Infrastructure (the Department) that part of the trail approved under DA 24/966 had been constructed outside of the approved alignment. A map showing the approved alignment vs the as built alignment is provided in **Appendix A**.

The Department (Mark Brown, Team Leader Alpine Resorts Team) advised in writing on 10 June 2025:

“...the Department would consider that a retrospective modification to the Playground MTB could not occur and seeks the submission of a use DA to enable use of the trail. The Department has forwarded the information provided to date to NPWS for comment and I will follow this up today”.

Hence, this application is being lodged to allow the use of the trail as per the Works as Executed plan in **Appendix B**.

3 Legislation and Statutory Framework

A review of the proposal against the following legislation was undertaken in the original DA 24/966. The assessment remains unchanged.

- *Environment Protection and Biodiversity Conservation Act 1999*
- *Environmental Planning and Assessment Act 1979*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (Precincts – Regional) 2021*

The Development is consistent with the aims and objectives of the relevant legislation and will not result in any significant adverse impacts. The Development is unlikely to have a significant impact on any MNES or Commonwealth land, and a referral to the Commonwealth Environment Minister is therefore not recommended.

3.1 NSW Alpine Region Development Control Plan 2025

Since lodgement of the original DA, the NSW Alpine Region Development Control Plan 2025 (Alpine DCP) has come into effect. The Alpine DCP provides detailed provisions for development in the NSW Alpine Resort areas. It aims to guide development, enable diverse recreational activities, minimise environmental and social impacts, and protect biophysical values.

Chapter 2.4 of the Alpine DCP describes the relevant development controls applicable to on-mountain infrastructure. A review of the Development against Chapter 2.4 is provided in **Table 1**.

Table 1: Alpine DCP, Chapter 2.4 On-mountain development and infrastructure provisions

Objectives and Controls	Comments
The objectives and controls in this part apply to development for the purposes of lifting facilities, monitoring stations, ski-slope huts, snow-making infrastructure, infrastructure facilities and recreation infrastructure.	The Development is for the purposes of recreation infrastructure.
<p>Objectives</p> <p>O1. Allow for a mix of summer and winter recreational opportunities for a range of visitor skill levels and types that enhances the particular Alpine Sub-region character.</p> <p>O2. Allow for on-mountain development and infrastructure that is environmentally sustainable and meets visitor needs.</p> <p>O3. Ensure ease and efficiency of circulation, adequacy of public facilities, lift and trail capacity and public safety to enhance amenity in all seasons.</p>	<p>Complies: <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>NA</p> <p>The Development is consistent with the objectives of Chapter 2.4 as it will contribute to improved trail network, therefore enhanced guest experience.</p>
<p>Controls</p> <p>C1. Upgrades to lifting infrastructure and snowmaking infrastructure prioritise development that limits disturbance to existing alignments. Where this is not practical or will result in adverse impact on amenity or efficiency, development may occur outside of existing alignments.</p>	<p>Complies: <input type="checkbox"/>Yes <input type="checkbox"/>No <input checked="" type="checkbox"/>NA</p> <p>The Development is for a mountain bike trail.</p>
<p>C2. Aerial lifts are to be used in place of surface lifts, unless it can be demonstrated that a surface lift is necessary for operational reasons and that the surface lift will result in minimal environmental impacts. Consideration will be given to environmental impacts and operational outcomes in consideration of the most appropriate form of lifting infrastructure and any associated cabling.</p>	<p>Complies: <input type="checkbox"/>Yes <input type="checkbox"/>No <input checked="" type="checkbox"/>NA</p> <p>The Development is for a mountain bike trail.</p>
<p>C3. Walking trails and infrastructure are designed along existing disturbed areas such as ski slopes. Where this is not practical, development may occur outside of existing disturbed areas.</p>	<p>Complies: <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>NA</p> <p>The Development has utilised a mix of disturbed areas and native vegetation.</p>
<p>C4. All summer and winter on-mountain developments and infrastructure make efficient use of the natural terrain by limiting terrain modification to where it is essential for safety, to resolve environmental issues or to improve visitor experience.</p>	<p>Complies: <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>NA</p> <p>The Development has been designed to utilise the natural terrain to create the appropriate gradients for an intermediate trail.</p>

4 Impact Assessment

The assessment of impacts to land, water, heritage, Aboriginal cultural heritage, landscape character and visual amenity, access, air, noise, socio-economic and MNES in the original DA 24/966 remains unchanged.

An assessment of the additional impacts to biodiversity have been assessed by Eco Logical Australia (2025). A copy of the assessment is provided in **Appendix C**.

5 Conclusion

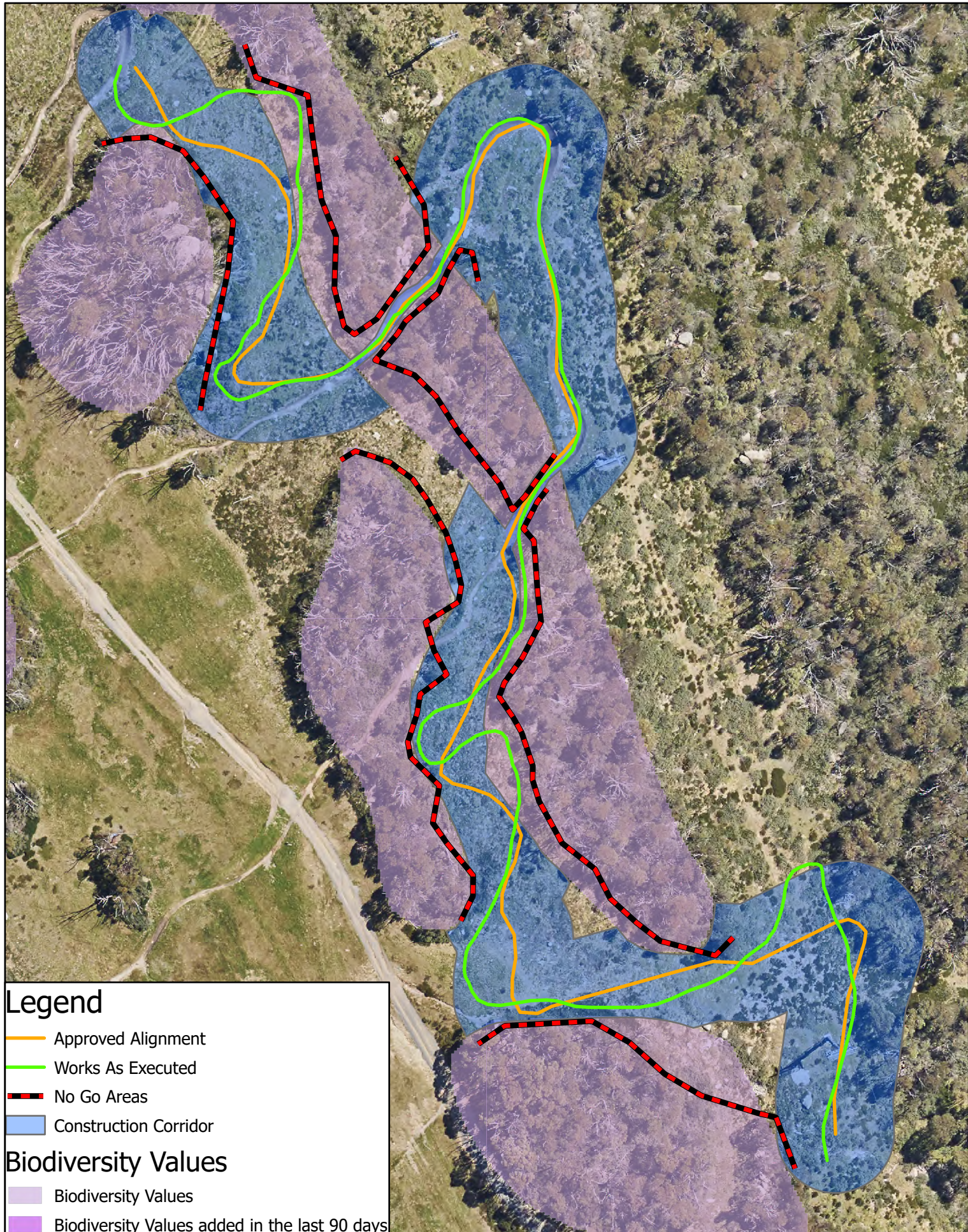
This application is seeking development approval for use of the Playground mountain bike trail that was constructed in summer 2024/2025 under DA 24/966. This application has been prepared in response to the advice from DPHI to legitimise the use of trail sections that did not align with the approval alignment. The ongoing use of the trail is considered to be of positive impact for Thredbo Alpine Resort and the broader Snowy Mountains region. The trail will be managed in accordance with the overarching Thredbo Mountain Bike Trail Management Plan as per the original development consent.

6 References

Eco Logical Australia 2025, Playground MTB Trail – Impacts on Biodiversity Values mapped areas and other non-compliances.

7 Appendices

Appendix A – Approved Trail Alignment VS Works as Executed



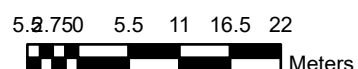
Legend

- Approved Alignment
- Works As Executed
- No Go Areas
- Construction Corridor

Biodiversity Values

- Biodiversity Values
- Biodiversity Values added in the last 90 days

Scale: 1:820



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



Approved Alignment vs Works As Executed

Project: DA 24/966
Playground MTB Trail

Revision: A
Date: 03/02/2025
Produced By: BB

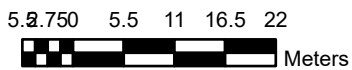
Appendix B – Works as Executed



Legend

— Works As Executed

Scale: 1:820



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



Works As Executed

Project: DA 24/966
Playground MTB Trail

Revision: A

Date: 03/02/2025

Produced By: BB

Appendix C – Flora and Fauna Assessment

7 March 2025

Our ref: 6614

Kosciuszko Thredbo Pty Ltd
PO Box 92
Thredbo NSW 2625
Attention: Chloe Chalk

Dear Chloe

Playground MTB Trail – Impacts on Biodiversity Values mapped areas and other non-compliances.

As requested, I inspected on 5 March 2025 the recently constructed Playground Mountain Bike trail in the Cruiser area of Thredbo Alpine Resort.

The trail construction has encroached upon areas that are mapped on the Biodiversity Values (BV) Map in three locations, as shown in photos 1-3, and Figure 1. The trail has also extended slightly beyond the approved construction corridor in one location as shown in Photo 4 and Figure 1.

I estimate that the encroachments upon the BV mapped areas has impacted approximately 140 m² of derived shrubland. As identified in (ELA 2023), this shrubland is derived from the historic canopy removal and ongoing slashing of Subalpine Woodland to create and maintain a ski run. Approximately a further 10 m² of shrubland was impacted where the constructed trail extended beyond the approved construction corridor, as shown in Photo 4. The flora and fauna assessment for the Playground trail (ELA 2023) estimated that 925 m² of derived shrubland would be impacted by the proposal.

I did not detect any evidence of the removal of any mature trees by the proposed works. However, it is likely that some young regrowth saplings (below 2 m in height) that were present within the derived shrubland would have been impacted.

Notwithstanding that a small amount of BV mapped vegetation was impacted, the impacted BV mapped vegetation is no different to the impacted non-BV mapped vegetation, which also comprises shrubland derived from Subalpine Woodland. As such, the works as executed would not have resulted in any substantial or significant additional impacts on vegetation and fauna habitats than that which were assessed and approved.

Whilst the encroachment upon the BV mapped area is regrettable and should not have happened, it appears to have come about in part due to the inconsistencies in the BV mapping in the area. The BV mapping in the Cruiser area is typically limited to “tree islands” or those areas where there are mature trees. However, in some places the mapping extends beyond the areas where there are trees, into the adjacent shrubland, and in other areas it does not. This inconsistency in the mapping appears to be a result of limitations of the mapping rather than any differences in vegetation condition or habitat value.

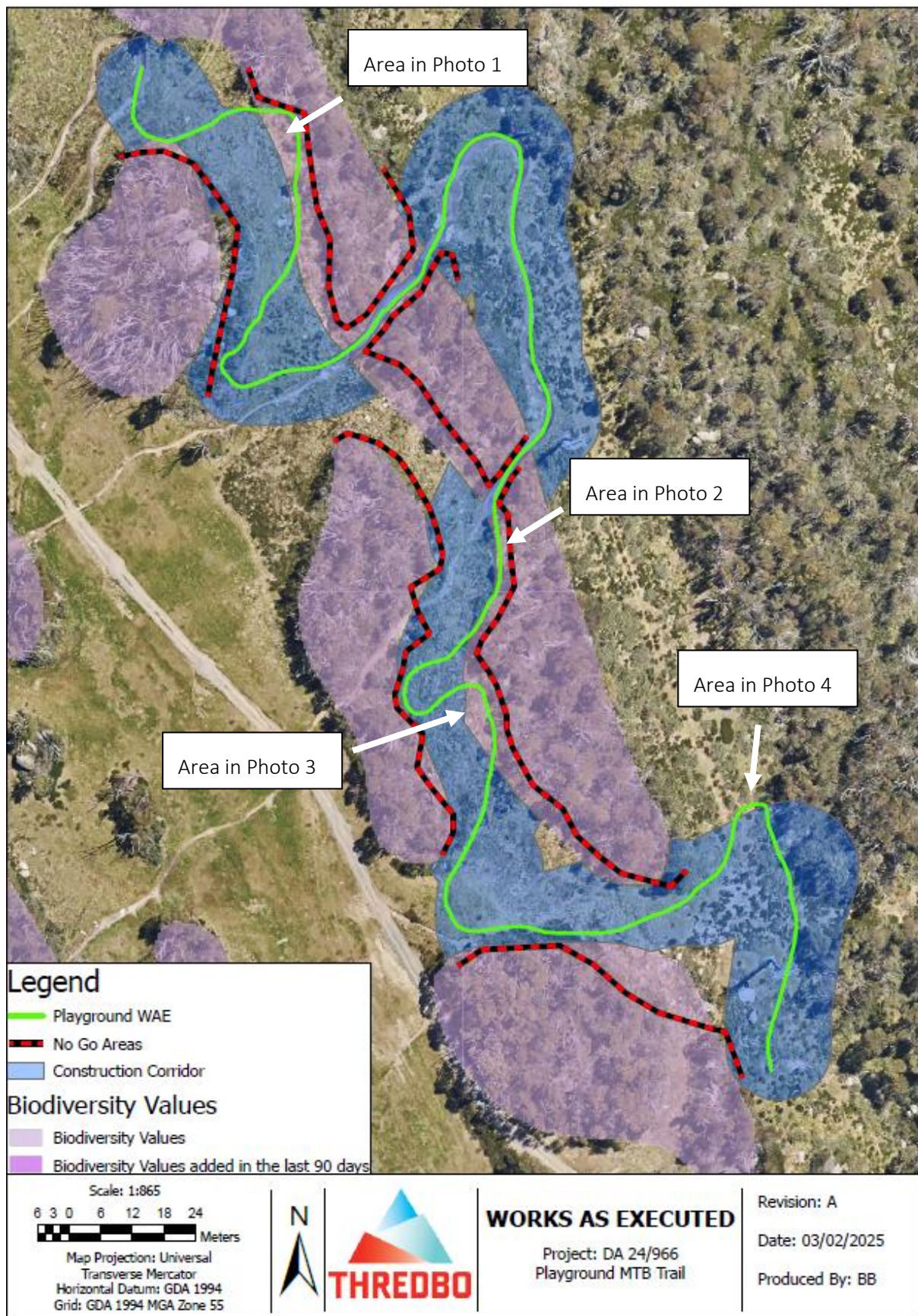


Figure 1: Playground Works as Executed Map showing areas shown in photos 1-4.



Photo 1: Minor encroachment into BV mapped vegetation. The person in the photo is standing on the edge of the BV map polygon demonstrating how it extends into the shrubland adjoining the tree island.



Photo 2: Minor encroachment into BV mapped vegetation. The person in the photo is standing on the edge of the BV map polygon demonstrating the minor encroachment into the BV mapped vegetation in this location.



Photo 3: Minor encroachment into BV mapped vegetation. The person in the photo is standing on the edge of the BV map polygon.



Photo 4: The location where the works extended beyond the approved construction corridor. The person in the photo is standing on the edge of the construction corridor.

In conclusion, whilst the works as executed encroached upon BV mapped vegetation and extended beyond the approved construction corridor, only a relatively small amount of vegetation was impacted. The impacted vegetation is minor in extent in the context of the extent of similar habitats in the Thredbo Resort area and in the locality more generally.

In my opinion, the non-compliances identified above would not have resulted in any substantial additional adverse impacts on threatened species, populations or ecological communities and will not have a significant impact on these entities pursuant to the NSW *Biodiversity Conservation Act 2016* or the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

Notwithstanding these conclusions, measures should be taken to minimise the risk of non-compliances of this nature occurring in the future.

Should you require any further information please contact me on 0422 802 447.

Regards,

A handwritten signature in black ink, appearing to read 'Ryan Smithers', with a stylized flourish at the end.

Ryan Smithers
Principal Ecologist

References

Eco Logical Australia 2023. *Flora and Fauna Assessment - Playground MTB Trail Thredbo Alpine Resort*. Prepared for Kosciuszko Thredbo Pty Ltd.