



Mr Mark Brown
Senior Planning Officer
Alpine Resorts Team
Department of Planning, Industry and Environment
Jindabyne NSW 2627

Our reference: DOC20/896706
EF20/30084

Dear Mark,

**DA Referral – Additions and alterations, 20 Mountain Drive, Thredbo
DA 10630**

I refer to the above development application (DA) forwarded to the National Parks and Wildlife Service (NPWS) for provision of comments in accordance with *State Environmental Planning Policy (Kosciuszko National Park - Alpine Resorts) 2007* (SEPP). In providing these comments consideration has been had to the *National Parks and Wildlife Act 1974*, the Kosciuszko Plan of Management 2006 (KNP PoM) and the *Biodiversity Conservation Act 2016* (BC Act) and any other applicable legislation. Accordingly, I suggest that the following should be considered by the Department of Planning, Industry and Environment (DPIE) in its assessment.

1. Leasing and KNP PoM

- 1.1 NPWS Property and Commercial Branch (PCB) have advised that this type of development is generally permissible under the head lease however PCB will pursue separately the matter of Lessor's Consent and occupancy compliance under the head lease.
- 1.2 PCB note that there is a proposed increase in beds in the property (addition of two) which needs to be consistent with the KNP PoM and Schedule 8 therein, and also in accordance with the Head Lease and sub-lease.
- 1.3 The works otherwise appear consistent with other relevant provisions of the KNP PoM (refer objectives for section 10.2.1(13), Alpine Resorts Management Unit), 10.4 (Thredbo Management Unit), section 11.6 (Environmental Quality) and chapter 8 (Recreation)).

2. BC Act

- 2.1 The Department should address the BC Act in its assessment. Whilst the BC Act has not been specifically addressed in the DA, NPWS's view is that works, as proposed with no impact to native vegetation or prescribed impacts, is not likely to significantly affect threatened species as the lease area is not mapped as Threatened Species habitat and the Biodiversity Offset Scheme is not triggered.
- 2.2 However, if native vegetation is required to be removed to fulfil RFS APZ requirements then further assessment under the BC act may be required.

3. Protection of native vegetation, fauna and fauna habitats

- 3.1 In order to assist in minimising any impacts of the proposed development NPWS recommends the following measures.
 - (i) To minimise weed vectors and other quarantine issues, all machinery and equipment used during construction must be cleaned prior to entry into the park to ensure the machinery is free of mud and vegetative propagules.
 - (ii) All stockpile sites, including materials storage areas, parking and waste management (skip bins) must not impact on native vegetation.

- (iii) All waste management receptors must be able to be **covered daily** to ensure waste cannot blow away or must be emptied or removed from site each day.
- (iv) Appropriate sediment and erosion controls must be regularly checked and maintained.

3.2 If additional vegetation management and/or clearing is required for an APZ or to fulfil the RFS *Standards for Asset Protection Zones*, then further consultation with NPWS is required in addition to the BC Act consideration as per point 2.2 above. Please note this is not consent for further vegetation management just a request for further consultation.

4. Aboriginal Cultural Heritage

- 4.1 The Aboriginal Cultural Heritage Due Diligence Assessment prepared by the proponent has followed a suitable process in determining that the proposed works are unlikely to harm Aboriginal objects.
- 4.2 However, should any Aboriginal objects be uncovered during construction, any works impacting the objects must cease immediately and the NPWS contacted for assessment of the site.

5. Plumbing and Drainage

5.1 NPWS is the delegated plumbing regulator in Kosciuszko National Park in accordance with the *Plumbing and Drainage Act 2011* and note that the following should be included in any consent conditions:

- (i) All plumbing and drainage work carried out must comply with the Plumbing Code of Australia and Australian Standard AS/NZS 3500.
- (ii) All plumbing and drainage work must be completed by a person holding a NSW licence, qualified supervisor certificate or tradesperson certificate.
- (iii) The following documents must be submitted by the qualified plumber to the NPWS Perisher Team, at the required stages of work:
 - Notice of Work before work commences.
 - Certificate of Compliance (CoC) and Sewer Service Diagram (SSD) on completion of works.

5.2 More information can be found at the following website:

<https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-management/alpine-resort-management/our-services/plumbing-and-drainage>

6. Other matters

6.1 I note that NPWS has also considered the following matters in its assessment:

- (i) All stormwater management and drainage should not cause additional environmental impacts.
- (ii) That the works have no public health components.
- (iii) That the property is not listed as a heritage item on the SEPP.

If you have any further enquires please contact the Assessment Coordinator on 02 6450 5543.

Yours sincerely



Mick Pettitt
Director
Southern Ranges Branch
9 December 2020