



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

Our reference: DOC21/114407
EF21/1168

Dear Mark,

**DA Referral – Internal and External Alterations and Additions, Clancy Alpine Lodge,
Smiggin Holes
DA 10657**

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 Team have advised that the proposed works are permissible under the lease.
- 1.2 The relevant provisions of the KNP PoM have been considered and it is determined the works fit within the management objectives for section 10.2 (Alpine Resorts Management Units), section 10.6 (Perisher Range Management Unit), section 11.6 (Environmental Quality) and chapter 8 (Recreation).

2. BC Act

- 2.1 NPWS consider that the BC Act has been addressed by the proponent in the DA and NPWS concurs that the development, as proposed, is not likely to affect threatened species and does not trigger the Biodiversity Offset Scheme.
- 2.2 It is noted that there are no proposed impacts to native vegetation as part of the application and that there is an existing NPWS approved APZ plan for both the implementation and ongoing maintenance of an APZ.

3. Protection of native vegetation, fauna and fauna habitats

- 3.1 In order to assist in minimising any impacts of the proposed development the following measures are recommended:
 - (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) Erosion and sediment control measures may be required for ground disturbance works and if so, then they must be regularly checked and maintained.
- (v) If straw bales are used for sediment and erosion control, then they must be certified as weed free.
- (vi) If excavations are left open overnight, then fauna egress provisions must be included.
- (vii) Imported gravel/materials must be free from weeds and pathogens.
- (viii) Rehabilitation of any disturbed areas must be in accordance with the '*Rehabilitation Guidelines for the Resort Areas of Kosciuszko National Park*'.
- (ix) Any areas that require rehabilitation must be monitored and maintained until an erosion resistant state has been achieved.

4. Aboriginal Cultural Heritage

- 4.1 The Aboriginal Cultural Heritage Assessment has followed a suitable process and due diligence in determining that the proposed works are unlikely to harm Aboriginal objects has been conducted.
- 4.2 However, should any Aboriginal objects be uncovered during construction, any works impacting the objects must cease immediately and the NPWS contact 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) That there are no perceived issues with Municipal Services and that these are not required to be located prior to works commencing.
- (ii) That there will be no change to stormwater drainage.
- (iii) That the works have no public health components.
- (iv) That the property is not listed as a heritage item on the SEPP.

- (v) That an APZ plan for both the implementation and ongoing maintenance of an APZ was approved by NPWS on 20 February 2020. This initial approval was via email however formal (letter) approval will be provided to the proponent to clearly demonstrate the area of APZ approved for ongoing vegetation management under the *National Parks and Wildlife Regulation 2019*.
- (vi) That the sediment fence as proposed on the sediment and erosion control plan encompasses the whole site, NPWS note that a sediment fence of this size may not be required given the amount of ground disturbance associated with the proposal.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mick Pettitt', with a large, stylized loop at the end.

Mick Pettitt
Director
Southern Ranges Branch
26 February 2021