



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

Our reference: DOC21/273645
EF21/4004

Dear Mark,

**DA Referral (further comments) – Redevelopment of lodge into 3 apartments, Snowgums Lodge, Thredbo Village
DA10604**

I refer to the above development application (DA) and the additional material provided by the proponent in support of the DA in, and attached to, the letter from Dabyne Planning Pty Limited to the Department of Planning, Industry and Environment (DPIE) dated 13 November 2020. Thank you for allowing the National Parks and Wildlife Service (NPWS) an opportunity to comment on the additional material and to supplement the comments we provided by letter dated 3 September 2020.

Based on our review of the additional material, it is pleasing to note that the recommendations we made on public health and underground petroleum storage matters are being, or will be, addressed. In relation to other matters, NPWS reiterates its previous comments and supplements those with the following:

1. Proposed asset protection zone (APZ) vegetation clearance

- 1.1 Vegetation removal not assessed as a component of a development application under the Environmental Planning and Assessment Act 1979 will require the consent of NPWS. Construing the letter from Kosciuszko Thredbo Pty Limited (KT) to the proponent dated 21 October 2020 as allowing vegetation removal without further authorisation would be inconsistent with KT's headlease for the Thredbo Alpine Resort and the National Parks and Wildlife Act 1974 and its regulation. We note that the letter from KT specifically refers to the need for an approved development application.
- 1.2 It is not clear to NPWS how the proponent will provide for an APZ of 17 metres to the south-west of the proposed development site (as per the NSW Rural Fire Service general terms of approval dated 16 March 2021) without vegetation clearance potentially impacting the watercourse which is approximately 15 metres from the site. To address this issue we recommend that the proponent consult with NPWS and KT before determination of the DA, including to facilitate an onsite inspection and develop an APZ management plan.

This recommendation is consistent with points 2 and 3 in our previous referral comments and will assist in ensuring impacts to native vegetation are accurately assessed (as per the requirements of the Biodiversity Conservation Act 2016). The proposed increase in APZ area from 15m to 17m is likely to increase the potential for adverse impacts to the nearby watercourse area if not managed appropriately and, accordingly, NPWS believes it will be important to confirm arrangements for APZ implementation and management prior to DA determination.

2. Location of watercourse

- 2.1 NPWS makes no comment on application of the Water Management (General) Regulation 2018, except to state that the hydroline spatial mapping extracted by the proponent does not appear to accurately represent the physical location of the watercourse in the relevant area. The mapping refers to 'hydrolines' and does not seem to distinguish between drainage lines and watercourses.
- 2.2 As mentioned in our previous comments, a survey of the KT headlease area undertaken by Peter Burns in 2002 shows the watercourse within approximately 15m of the proposed development site. This was confirmed by NPWS personnel prior to providing our previous comments.

If you have any further enquires then please contact the Resorts Environmental Services Team (Kelsey Boreham, Team Leader) on 02 6450 5665.

Yours sincerely

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

Mick Pettitt
Director
Southern Ranges Branch
12 April 2021