



South Perisher Lodge, Perisher Valley Modification

Modification Application Assessment (MOD 10113 (DA 42-8-2006 MOD 3))

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Cover image: Main Range, Kosciuszko National Park (Source: Alpine Resorts Team)

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Glossary

Abbreviation	Definition
BCA	Building Code of Australia
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
BVM	Biodiversity Values Map
Consent	Development Consent
Department	Department of Planning and Environment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
KNP	Kosciuszko National Park
Minister	Minister for Planning
NPWS	National Parks and Wildlife Service
Planning Secretary	Secretary of the Department of Planning and Environment
RFS	NSW Rural Fire Service
SEPP	State Environmental Planning Policy

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1 Introduction

1.1 Preamble

This report contains the Department of Planning and Environment's (the Department's) assessment of an application to modify the development consent (DA 42-8-2006) for additions and alterations to South Perisher Lodge, Perisher Valley, Perisher Range Alpine Resort within Kosciuszko National Park (KNP) (Figure 1).

The application has been lodged by South Perisher Co-Operative Alpine Club (the Applicant) pursuant to section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The modification application originally sought approval for:

- replacement of hardiplank cladding on the lower half of the southern elevation, installed as part of the original approved works, with Stramit Monopanel (consistent with the other half of the elevation)
- deletion of an approved bathroom window from the southern elevation (to be replaced with an extraction vent through the ceiling and roof)
- reconstruction of an awning structure constructed over the external BBQ area (eastern elevation)



Figure 1 | South Perisher site (Source: SIX Maps 2020)

Following additional discussions with the Applicant, including a request for amended bushfire requirements from the NSW Rural Fire Service, the Department sought to resolve the modification application and discussed the retention of the approved bathroom window. The Applicant agreed to amend the proposal, and the Department requested amended plans, however they have not been received.

The Department seeks to finalise the application based on conditioning amendments to the plans.

The Minister for Planning is the consent authority for development within a ski resort in KNP and the proposal is permissible with consent under the provisions of *State Environmental Planning Policy (Precincts – Regional) 2021* (the Precincts – Regional SEPP).

On 1 March 2022, the *State Environmental Planning Policy (Kosciuszko National Park-Alpine Resorts) 2007* (the Alpine SEPP) was consolidated into the Precincts - Regional SEPP. The SEPP consolidation is administrative. No policy changes have been made.

1.2 Background

The site is located in Perisher Range Alpine Resort, which is within the southern part of KNP. The subject site is known as ‘South Perisher Lodge’ (Lot 187 DP 257287), Duncan Place, within Perisher Valley and adjoins another tourist accommodation premises, ‘Yeti Lodge’ that is located to the north.

The existing building (**Figure 2**) was constructed in the 1960’s, with the lodge being used as a private ski accommodation. Improvement to the lodge have occurred over a span of more than a decade, such as parts of the new cladding and building works approved in 2007.

The site has an area of approximately 689sqm, slopes from west to east and is accessed off Duncan Place. The site includes native vegetation surrounding the site, except for the northern component fronting Duncan Place which includes exotic grasses.



Figure 2 | Existing South Perisher Lodge site – viewed from the north (Source: Department inspection)

1.3 Approval History

On 27 August 2007, the Team Leader of Urban Assessments (Alpine Resorts Team), as delegate of the then Minister for Planning, granted consent to a Development Application (DA 42-8-2006) for extensive alterations and additions to the existing lodge.

On 20 March 2008, the Team Leader of Urban Assessments (Alpine Resorts Team), as delegate of the then Minister for Planning, granted consent to a Modification Application (MOD 9-3-2008) for the following:

- Extend bedroom 5 to the south to line up with previously approved new south wall of bedroom 4. Extend living N walls to rest on exterior walls below.
- Relocate air lock and provide additional windows to east side of living E. Extend deck and close off stairs from living E.
- Remove window near front door of porch air lock, extend under floor space to support bedroom 5 and relocate gas tank.

On 25 February 2011, the Team Leader of the Alpine Resorts Team, as delegate of the then Minister for Planning, granted consent to a Development Application (DA 007-02-2011) for the construction of internal walls to create 2 bedrooms and ensuites on the upper level of the building (previously the bar and lounge area). These works are separate to the DA 42-8-2006 and modification works.

On 25 February 2011, the Team Leader of the Alpine Resorts Team, as delegate of the then Minister for Planning, granted consent to a Modification Application (DA 042-08-2006 MOD 2) for the following:

- Construction of new walls and doorways between internal stairs and Living Room on the First Floor. Add new kitchen cupboards and appliances.
- Removal of an existing window and replacement of an existing window with a new window on the Northern Elevation of the First Floor. Installation of a new window on the Southern Elevation of the Second Floor (**Figure 3**), which is a consequence of a new ensuite being provided as part of DA 007-02-2011. Installation of 2 x new windows on the Western Elevation of the Second Floor and alter window on the Western Elevation of the First Floor.

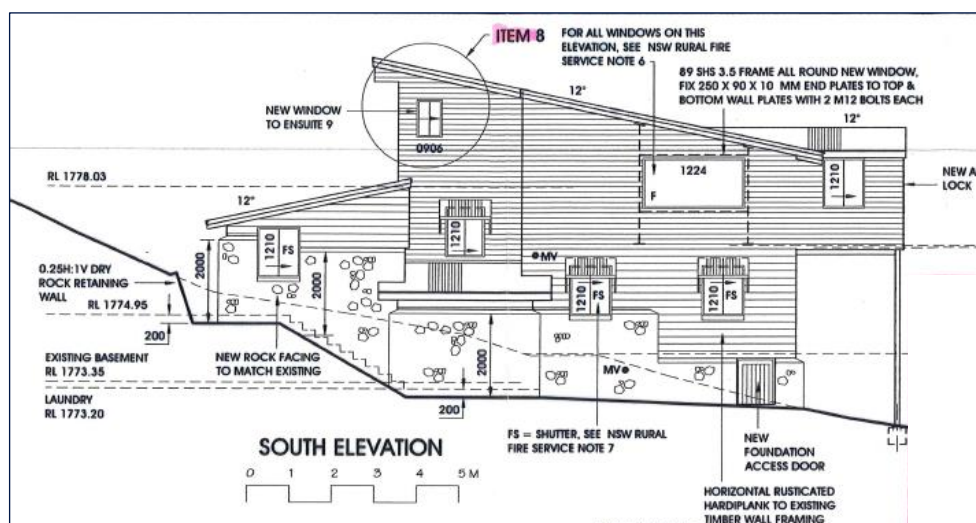


Figure 3 | Approved MOD 2 south elevation works, with bathroom window circled to be removed as part of the original MOD 3 application (Source: Applicant's modification documentation)

2 Proposed Modification

On 17 December 2019, the Applicant originally lodged a modification application (MOD 10113 (DA 42-8-2006 MOD 3)) seeking approval, under section 4.55(1A) of the EP&A Act, to modify the development consent incorporating external alterations as follows:

- replacement of the existing water damaged hardiplank cladding on the external southern elevation with Stramit Monopanel consistent with the other works carried out on the building (**Figure 4**)
- deletion of an approved bathroom window from the southern elevation (to be replaced with an extraction vent through the ceiling and roof) (**Figure 4**)
- reconstruction of an awning structure constructed over the external BBQ area (eastern elevation)

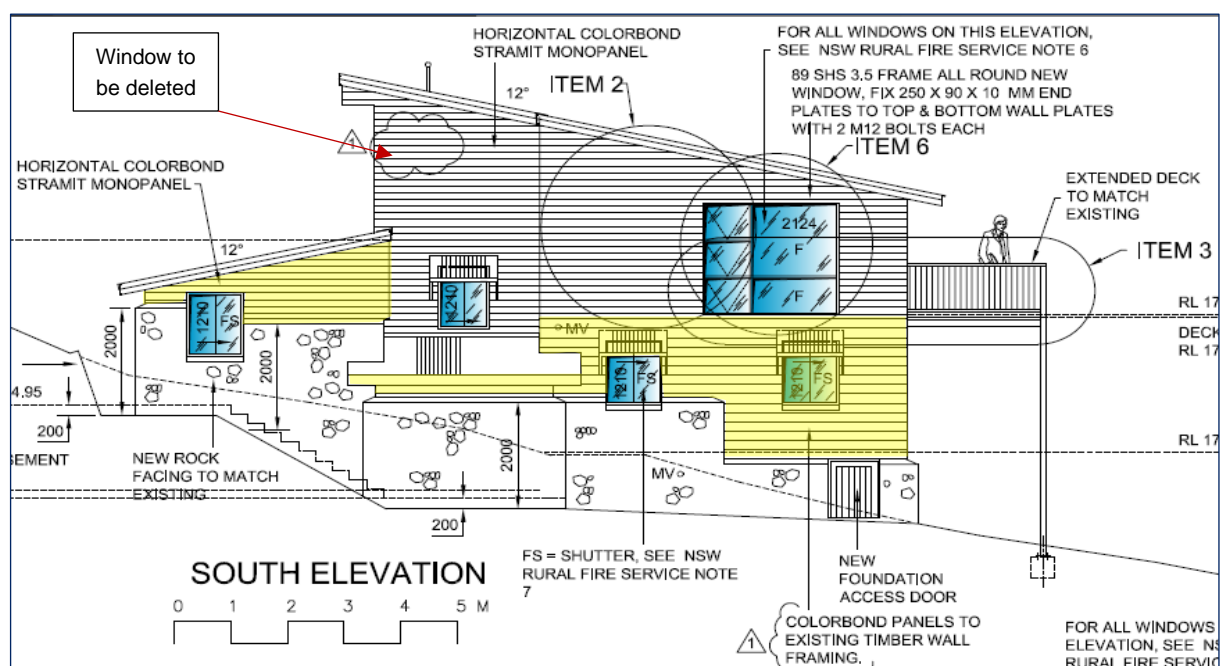


Figure 4 | Proposed original south elevation – illustrating area of recladding (highlighted yellow) and deletion of window (Source: Applicant's documentation)

As a result of additional discussions with the Applicant, following receipt of an amended BFSA from the RFS, the Applicant amended the proposal to retain the approved bathroom window along the South Elevation as the original MOD 3 BFSA from the RFS required the proposed flue from the bathroom to be constructed to a BAL FZ construction. Through the retention of the approved window, the Applicant is able to construct the window to in accordance with condition 6 of the BFSA (or condition G1 6 of the original DA) which requires glazing to the southern and western facades to withstand a radiant heat flux rating of 40kW/m².

The Applicant advises that there is no increase in the bed capacity of the building due to the proposed modification, noting the proposal only relates to the external appearance of the building.

The Applicant advises that the modification is minor in nature and scale, associated in part with maintenance of the lodge. The removal of the damaged hardiplank cladding on the external wall of the southern elevation of the lodge and replacement with colorbond Stramit Monopanel is a practical improvement with regard to fire safety and improved longevity of the building.

3 Strategic Context

The Snowy Mountains region offers a diverse and unique mix of visitor destinations including the KNP, the alpine resorts, the iconic Snowy River and the highest mountains on the Australian continent. A strong tourism economy is driven mainly by skiing and related winter sport experiences during the peak winter season. The region, including the alpine resorts, also provides opportunities for a range of other recreational activities during the warmer months such as hiking, fishing, kayaking and mountain-biking. The resorts are important to NSW due to their economic and social contribution as well as their location within a unique alpine environment. The two main documents that support the strategic context of the alpine resorts are the *South East and Tableland Regional Plan 2036* and the *Precincts – Regional SEPP*.

South East and Tableland Regional Plan 2036

The South East and Tableland Regional Plan 2036 describes the vision, goals and actions that will deliver greater prosperity for those who live, work and visit the region. The plan provides an overarching framework to guide more detailed land use plans, development proposals and infrastructure funding decisions.

In relation to the alpine resorts, the Regional Plan seeks to promote more diverse tourism opportunities in the Snowy Mountains that will strengthen long-term resilience while acknowledging the environmental and cultural significance of the locality.

The Department considers the proposal continues to be consistent with the Regional Plan as proposal maintains the existing use of the site for tourist accommodation, with the modifications not impacting the functionality of the approved the building, which supports visitation to the NSW ski resorts.

Precincts – Regional SEPP

The Precincts – Regional SEPP governs development on land within the ski resort areas of KNP. Chapter 4 of the SEPP aims to protect the natural and cultural heritage of land within the resorts and to encourage environmentally sustainable development. Under the provisions of clause 4.15 of the Precincts – Regional SEPP, the National Parks and Wildlife Service (NPWS) have a commenting role as the land manager, which includes administering the Plan of Management framework for KNP that incorporates objectives, principles and policies to guide the long-term management of the broad range of values found in the park.

The Department considers the proposal continues to be consistent with Chapter 4 of the Precincts – Regional SEPP as the proposal incorporates works to an existing building while satisfying the principles of ecologically sustainable development and having no adverse impacts on the environment.

4 Statutory context

4.1 Scope of modifications

Section 4.55(1A) of the EP&A Act provides that a consent authority may, on an application being made by the applicant or any other person entitled to act on a consent granted by the consent authority, and subject to and in accordance with the *Environmental Planning and Assessment Regulations 2000* (EP&A Regulations), modify a consent if the following requirements in Table 1 are met:

Table 1: Consideration under Section 4.55(1A) of the EP&A Act

Section 4.55(1A) - Evaluation	Comment
(a) <i>That the proposed modification is of minimal environmental impact</i>	<p>Section 6 of this report provides an assessment of the impacts associated with the proposal.</p> <p>The Department is satisfied that the proposed modifications will have minimal environmental impact.</p>
(b) <i>The development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all)</i>	<p>The proposed changes to the built form are minor in nature and are not considered to negatively impact the original consent.</p> <p>The Department is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted.</p>
(c) <i>The application has been notified in accordance with the regulations</i>	<p>In accordance with the Department's Community Participation Plan (CPP), November 2019, the Department publicly exhibited the modification application for a minimum of 14 days to nearby lodges and it was made publicly available on the NSW Planning Portal website (refer to Section 5 of this report).</p>
(d) <i>Consideration of any submissions made concerning the proposed modification within the period prescribed by the regulations</i>	<p>The Department has considered the submissions received during the exhibition period (refer to Section 5 and 6 of this report).</p>

Section 4.55(3) of the EP&A Act provides that in determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15(1) as are of relevance to the development the subject of the application. The consent authority must also take into consideration the reasons given by the consent authority for the granting of the consent that is sought to be modified.

The relevant consideration under Section 4.15(1) of the EP&A Act in relation to the proposed modifications is whether the impacts of the amendments upon the existing environment are acceptable. The Department's assessment in **Section 6** concludes that the impacts are acceptable and do not negatively impact the Department's previous assessment.

Therefore, the Department is satisfied the proposed modification is within the scope of section 4.55(1A) of the EP&A Act and does not constitute a new development application. Accordingly, the Department considers that the application should be assessed and determined under section 4.55(1A) of the EP&A Act rather than requiring a new development application to be lodged.

4.2 Consent authority

The original application was determined under the delegation of the Minister for Planning, therefore the Minister remains as the consent authority for any subsequent applications to modify the consent.

Under clause 4.6 of the Precincts – Regional SEPP, the Minister for Planning is the consent authority for the application as the development takes place within a ski resort area as referred to in clause 32C (2)(a) of Schedule 1 to the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017*.

In accordance with the Minister's delegation dated 9 March 2022, the Team Leader, Alpine Resorts Team may determine the application as:

- no reportable political donation has been disclosed
- there are less than 15 public submissions in the nature of objections
- the application is in relation to land which Chapter 4 of the Precincts – Regional SEPP applies

4.3 Mandatory matters for consideration

The Department conducted a comprehensive assessment of the project against the mandatory matters for consideration as part of the original assessment of DA 42-8-2006. The Department considers this modification application does not result in significant changes that would alter the mandatory matters for consideration under section 4.15 of the EP&A Act and conclusions made as part of the original assessment.

Objects of the EP&A Act

The Minister or delegate must consider the objects of the EP&A Act when making decisions under the Act. The Department is satisfied the proposed modification is consistent with the objects of the EP&A Act.

Biodiversity Conservation Act 2016

Section 1.7 of the EP&A Act requires the application of the *Biodiversity Conservation Act 2016* (BC Act) in connection with the terrestrial environment. The BC Act introduced a Biodiversity Offsets Scheme (BOS) that applies when:

- the amount of native vegetation being cleared exceeds a certain threshold area; or
- the impacts occur within an area mapped on the Biodiversity Values Map (BVM) published by the Minister for Environment; or

- the 'test of significance', in section 7.3 of the BC Act, identifies that the development or activity is likely to significantly effect threatened species or ecological communities, or their habitats; or
- the works are carried out in a declared area of outstanding biodiversity value.

The Applicant did not provide comments on the applicability of the BC Act.

The NPWS recommended that the Department consider the BC Act in its assessment, however it was noted that the works as proposed do not impact on native vegetation or involve ground disturbance. If native vegetation removal is required for an APZ, then this is to be considered under the BC Act.

The Department notes that part of the site (southern corner) is mapped on the BVM (**Figure 5**) and the works are only to the façade of the existing building (i.e. not increasing the buildings area).



Figure 5 | Biodiversity Value area is shown in purple (Source: <https://www.lmbc.nsw.gov.au>)

After receipt of the initial Bushfire Safety Authority (BFSa) from the RFS, additional discussions were held with the NPWS in terms of providing an APZ plan for the allotment only (following NPWS concerns that clearing outside of the allotment would impact BVM areas – see **Section 5**). NPWS have indicated that it would work with the Applicant to prepare an APZ plan for the allotment only, that would ensure the proposal would not significantly affect threatened species or ecological communities, or their habitats. This includes identifying areas to be retained, in particular those identified on the BVM which is only a small portion of the site.

The Department does not raise any concerns with enabling discussions with NPWS to occur outside of the modification application process. In order to finalise this modification, a condition of consent is recommended requiring additional liaison with NPWS

The Department notes that there is currently no declared area of outstanding biodiversity value within Kosciuszko National Park.

Environmental Planning Instruments

The Precincts – Regional SEPP is the only relevant EPI that applies to this application.

An assessment of compliance with the then State Environmental Planning Policy No. 73 – Kosciuszko Ski Resorts was undertaken in the determination of the original application (DA 42-8-2006) and the Alpine SEPP for the subsequent MOD 1 and 2 applications.

The Department has considered the current modification application against the provisions of the Precincts – Regional SEPP and is satisfied the modification proposal continues to be consistent with this EPI.

5 Engagement

5.1 Department's engagement

The Department's Community Participation Plan (CPP), November 2019, prepared in accordance with Schedule 1 of the EP&A Act requires applications for modifications of development consent not required to be exhibited by the EP&A Regulations to be exhibited for a timeframe dependent on the urgency, scale and nature of the proposal.

In this regard, the Department also notes that the CPP advises that applications for development consent under Chapter 4 of the Precincts – Regional SEPP are not required to be public exhibited if the proposal relates to works which are wholly internal to a building or where the site is located more than 50 metres away from a tourist accommodation building.

On this basis, due to the works including external works located within 50 metres of a tourist accommodation building, the Department formed the view to make the application publicly available and notify the nearby lodge (Yeti Ski Club) of the application between 13 January 2020 and 7 February 2020 on the NSW Planning Portal website.

The application was forwarded to the NSW Rural Fire Service (RFS) pursuant to Section 4.46 of the EP&A Act (integrated development) as a Bushfire Safety Authority (BFSA) under the *Rural Fires Act 1997* is required for the development to be carried out and the National Parks and Wildlife Service (NPWS) pursuant to clause 4.15 of the Precincts – Regional SEPP.

Following the exhibition of the application, the Department placed copies of all submissions received on its website and forwarded these to the Applicant.

5.2 Summary of submissions

The Department received submissions from the RFS and the NPWS. No public submissions were received.

5.3 Key issues – Government Agencies

The RFS did not object to the original proposal and issued a BFSA under clause 100B of the *Rural Fires Act 1997* for the works associated with the modification. The BFSA required the allotment to be managed as an Inner Protection Area, all modification works to be carried out to meet BAL FZ and upgrading of the building to improve ember protection.

The NPWS did not object to the proposal and commented that the modifications do not impact on native vegetation or involve ground disturbance. If native vegetation removal is required for an Asset Protection Zone, then additional biodiversity and aboriginal heritage discussion is required. No additional concerns were raised with heritage, municipal services and stormwater.

Further discussions between the NPWS, the Department and the Applicant in relation to the RFS construction standard requirements, a question was raised whether clearing outside of the allotment to reduce the BAL construction standard was possible. NPWS determined that when noting the biodiversity values of the adjoining vegetation, that no clearing outside of the allotment would be permitted (i.e. vegetation management for the purposes of an IPA is to occur wholly on the subject site).

As a consequence, the Applicant submitted additional correspondence to be referred back to the RFS for reconsideration of an amended BFSA noting the NPWS comment that an IPA could be provided on the site only. This additional information also commented that the works are of an urgent repair to protect the structural integrity of the wall and prevent further water egress and damage to the wall structure.

An amended BFSA was issued by the RFS which included the following points:

- *All proposed minor external works to the existing building identified as repair and replacement works shall:*
 - *Not comprise the making of, or an alteration to the size of, any opening in a wall or roof, such as a doorway, window or skylight;*
 - *Be adequately sealed or protected to prevent the entry of embers; and*
 - *Use equivalent or improved fire-resistant materials that do not affect any existing fire resisting components of the building.*
- *All proposed new additions to the existing building not identified as repair and replacement works must comply with Section 3 (excluding section 3.5) and Section 9 (BAL FZ) of Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas or the relevant BAL-FZ requirements of the NASH Standard - Steel Framed Construction in Bushfire Areas (incorporating amendment A - 2015). New construction must also comply with the construction requirements in Section 7.5 of Planning for Bush Fire Protection 2019.*

The Department has considered the comments received from the RFS and the NPWS in **Section 6**.

6 Assessment

In assessing the merits of the proposed modification, the Department has considered the:

- previous Environmental Assessment Reports for the proposal
- the modification application and existing conditions of consent
- submissions from government agencies
- matters for consideration under Section 4.15(1) of the EP&A Act

The Department considers the key assessment issues associated with the modification application are:

6.1 Design changes

The key external change to the southern elevation comprises the replacement of the deteriorated Hardiplank cladding on the lower half of the southern elevation with Stramit Monopanel.

Along with other components previously approved, the southern elevation (**Figure 5**) has been partly completed with the extension of the building and the cladding of the wall in Hardiplank (lower half) and Stramit Monopanel cladding (top half). As shown in this photograph below, the installed Hardiplank cladding has deteriorated from water / snow damage that enables water to damage the internal walls.



Figure 6 | Existing southern elevation illustrating part of works completed and area to be replaced with Stramit Monopanel (Source: Department inspection - 2020)

The modifications to the design of the southern elevation do not impact upon adjoining properties or require additional vegetation loss along this boundary. The change from Hardiplank to Stramit Monopanel is appropriate and ensures reduced ongoing maintenance of the lodge.

The NPWS raised no concerns with the proposed built form modifications.

The Department's assessment concludes that the proposed design changes for the southern elevation are minor in nature and do not result in impacts to adjoining properties. The Department notes that the Stramit Monopanel to be installed is of similar colour to the existing Hardiplank ensuring a two-tone lodge throughout. In order to resolve the modification, with the receipt of no amended plans, the Department also recommends that the profile of the Monopanel be consistent with that of the Hardiplank to ensure consistency throughout the building's exterior.

This aspect of the proposed modification is supported.

6.2 Awning

The Applicant seeks the reconstruction of an existing timber post and colorbond awning that has been constructed without consent, which covers the existing BBQ area (**Figure 6**). A new awning is proposed to be designed and budgeted to replace the existing awning with a steel construction.



Figure 7 | Existing awning constructed on the external deck (Source: Department inspection)

The BFA provided by the RFS requires works to the building to comply with BAL FZ construction requirements. This would require the removal of the existing structure and replacement with non-combustible materials.

No concerns are raised with this component of the application.

7 Evaluation

The Department has assessed the modification application and supporting information in accordance with the relevant requirements of the EP&A Act and considered the submissions provided by the public and RFS and the NPWS.

The Department's assessment concludes that the proposed modification is appropriate as:

- the modification is of minimal environmental impact and does not have any additional environmental impacts beyond the approved development
- it is substantially the same development as originally approved
- the proposed modifications to conditions are acceptable, except the proposed amendments to the hours of work and construction which is recommended to be maintained
- the proposal continues to comply with the Precincts – Regional SEPP provisions
- all submissions received during the assessment of the application have been considered
- the proposal does not result in any additional matters that required consideration under Section 4.15(1) of the EP&A Act

The Department concludes the impacts of the development are acceptable and the proposal is in the public interest. The Department recommends that the application be approved, subject to changes to the existing conditions of consent (**Appendix C**).

8 Recommendation

It is recommended that the Team Leader, Alpine Resorts Team, as delegate of the Minister:

- **considers** the findings and recommendations of this report
- **determines** that the modification application MOD 10113 (DA 42-8-2006 MOD 3) falls within the scope of section 4.55(1A) of the EP&A Act
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to approve the modification
- **modify** the consent DA 42-8-2006
- **signs** the attached approval of the modification (**Appendix C**).

Recommended by:

A handwritten signature in black ink that reads "Mark Brown." with a horizontal line underneath the name.


Mark Brown

Senior Planner

Alpine Resorts Team

9 Determination

The recommendation is **Adopted** / ~~Not adopted~~ by:



Daniel James

Team Leader

Alpine Resorts Team

as delegate of the Minister for Planning

19 May 2022

Appendices

Appendix A – Modification Report

The following supporting documents and supporting information to this assessment report can be found on the NSW Planning Portal website as follows:

<https://www.planningportal.nsw.gov.au/development-assessment/state-significant-applications/projects/state-development-applications>

Appendix B – Submissions

The Department made the application publicly available and notified all lodges within Thredbo Alpine Resort of the application between 13 January 2020 and 7 February 2020.

The application was referred to the RFS (as the original and modification is integrated development) and NPWS pursuant to clause 4.15 of Chapter 4 of the Precincts-Regional SEPP, with comments received. No submissions from the public were received.

Appendix C – Notice of Modification