



Ski Lodges Organisation of Perisher Smiggins and Guthega

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24 October 2018

Department of Planning and Environment
Alpine Resorts Team
PO Box 36
JINDABYNE NSW 2627

Attention: Mark Brown

Dear Sir

RE: DA 9640, PERISHER VIEW SKI LODGE, PERISHER VALLEY

It is with much concern that the Ski Lodges Association of Perisher Smiggins and Guthega Inc (SLOPES) makes this objection to DA 9640 for a new commercial tourist accommodation development of 24 beds on Burramys Road, Perisher.

SLOPES is a not for profit entity incorporated under the Associations Incorporation Act 1984. Members of SLOPES are the 88 Ski Clubs of the Perisher Range Resorts of Perisher, Smiggin Holes and Guthega. More information regarding SLOPES can be found at www.slopes.org.au

First, this submission is hampered by the fact that the notification material provided for viewing on the Department's web-site is not complete and especially is missing essential material including the floor plans for a proper consideration of the proposal. The documentation is further confused by the description and titling of the elevations that appear incorrect. It is SLOPES' consideration that the Burramys Road elevation is the north-east elevation (not south-east), the elevation abutting the church is the south-east (not south-west), the elevation facing Front Valley is facing south-west (not north-west). Nevertheless, there is sufficient information for SLOPES to have serious concerns regarding the proposal. These are summarised below.

Creation of the Lot

SLOPES was unaware of the subdivision that created the 1,428 square metre lot for the proposed development. It is understood by SLOPES that the clubs surrounding the site were also unaware of the subdivision as it was not notified.

The significance of this is that no one has had the opportunity to comment on the impact of the subdivision and potential development on over-snow access in the area and skier movements during winter. It may work in summer, and on paper, but it has issues in winter

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on the skiing activity in Front Valley which is the busiest part of Perisher. The route of Burradays Road swings wide and it is SLOPES' assessment that the development of the site will force all skiing and over-snow movements around the DA site conflicting with the run-down area of the half-pipe and the 'beginners' area around Tom Thumb. Currently movements "cut the corner" as this is the safest route and avoids potential conflicts with skiers. This is potentially a serious safety issue as activity in the vicinity in winter is constrained.

SLOPES questions whether Perisher-Vail has agreed to re-viewing and potentially possibly having to re-arrange its activities in the area to address the potential safety issues.

Nature of Proposed Development

The application is for a "commercial lodge" development of a newly created lot in the Outer Perisher Precinct of Perisher Valley. The DA speaks of a proposal for 6 "dual-key" units or 12 units comprising 6 studio and 6 one-bedroom units that are self-contained. This is not a commercial lodge development. A commercial lodge provides suites (some interconnecting) with communal living and dining with an on-site manager and generally catering. The tourist accommodation provided in a commercial lodge is generally a Class 3 building under the BCA. The proposed development is more akin to a Class 2 building with each unit being self-contained providing kitchen, living, dining and sleeping. In the context of tourist accommodation, the development appears to be serviced apartments. In the absence of the plans it is unknown whether one of the units is a Manager's residence. While a communal living and media space is advised in the Statement of Environmental Effects to be provided on the ground level and a shared ski room, ski/boot room and storage on the lower ground floor, this does not fulfil the characterisation of a Perisher commercial lodge building style where social interaction between visitors is part of their stay.

SLOPES acknowledges the flexibility of the arrangement but the Outer Perisher Precinct has not to date been considered for this type of development. The focus for this type of development is proposed in the future Perisher Village Central Precinct under the Perisher Range Resorts Master Plan 2001. In fact, the Master Plan indicates permitted land uses in the Outer Precinct as being only "extensions and refurbishment of private lodges and commercial accommodation" (p. 142).

As a consequence of the nature of the development the proposed building is substantially larger in footprint, mass, bulk and height than would normally be associated with a 24-bed commercial lodge as each unit provides separate living and dining spaces in addition to the communal space.

It is unknown whether in the longer term there is an intention to strata subdivide the development under the *Strata Schemes Development Act 2015* into a leasehold strata scheme but the form of the development could enable such a proposal. Again, such a proposal would be inconsistent with a commercial lodge development style in the Outer Precinct of Perisher.

Heads of Consideration Cl. 14 State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007

The following comments by SLOPES focus on the heads of consideration in assessment of the proposal under Clause 14 of the SEPP but only where SLOPES considers there are issues. It is noted that no comments on geotechnical or some environmental matters are

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possible as these reports are not included in the notification documentation. SLOPES also acknowledges the fact that these matters will be assessed by experts in the Department during processing of the DA.

1. Consistency with Objectives

As previously noted in this submission SLOPES has safety concerns with the proposal and its potential impacts on the operation of skiing activities in Front Valley. This has potential economic and operational impacts.

The nature of the development providing self-contained units has the potential of undermining the social interaction that normally occurs between visitors to commercial lodges and is a feature of skiing experience.

2. Is Balance Appropriate?

The height, mass bulk, scale and site coverage of the building are considered excessive especially when considering that only 24 beds are proposed. The sloping site with limited stepping in the building and excessive sub-floor space adds to the impacts of the height, mass and bulk. The sub-floor space is equal to adding another level making it a 3 to 4 storey building in effect rather than a 2 to 3 storey building.

The setbacks to the boundaries are inadequate to allow for landscaping treatment that could seek to provide some balance to the mass of the building. Only alpine grasses and low alpine heath species are possible and proposed. This is inconsistent with the environmental style of the Perisher Outer Precincts where the numerous but scattered lodges are dispersed in an alpine and woodland setting.

The architectural style with façade heights of more than 10 metres in part relies on changes in materials and colour to provide the articulation of the façades where varying setbacks vertically and horizontally should be provided and more stepping of the building. The enclosed and partially enclosed balconies do not relieve the presentation. The external finishes of mainly "colorbond" metal proposed for the elevations and roof of the building are inconsistent with the natural environment combined with the limited (less than required) use of local stone cladding on the base of the building. This results in the building failing in its ability to "bed" adequately into its site.

The adjacent church will be dwarfed in scale by the proposed development. Although the south-eastern elevation facing the church is only 2 metres higher than the highest point of the church, the facade height is three times the height of the single storey church façade as the church has a steep hipped roof form and nestles into the slope. In addition, the design of the 11-degree skillion roof form that slopes towards the church will dump its snow on the side of the church causing a banking up of snow against the church. The Statement of Environmental Effects notes that the roof is designed to clear snow and minimise loading on the roof but it has no regard to the impacts of the roof design on the neighbouring church. The church is a significant feature of Front Valley that should be protected in its context and setting. It is unknown whether there will be a structural implication for the church or whether any wind analysis has occurred to determine whether the built up snow will affect other areas outside the site.

The shadowing impacts of the building in the morning and to nearly noon are towards the Tom Thumb beginner skiing areas. This will have an adverse morning impact on the use of the skiing area west of the site. The afternoon shadowing is mainly over the church.

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3. Infrastructure Impacts of Development

SLOPES acknowledges that the development is a relocation of half the beds that once existed in the old Perisher View lodge but the old site was not in the Perisher Village. It is assumed that the capacity of the Perisher municipal services to accommodate the development is adequate for the new 24 bed development given the fact the OEH has accepted the creation of the lot.

4. Change to the Character and Visual Impact

The mass, bulk, height, site coverage and style of the proposal is out of character with the area and context of the site. It is also inconsistent in building separation in its relationship to the church and Celmisia Lodge. The colours and finishes are inconsistent and there are no buildings of this scale in this part of the Outer Precincts. SLOPES assumes that in order to maximise the floor space to enable self-contained units the skillion roof form is part of the design. This roof form lacks the drama of potential roof forms that are a feature of the alpine resorts including in the main Perisher-Vail commercial buildings.

The mass, height and bulk are exacerbated by the large storage spaces added to some units. The purpose of the storage areas when the development is tourist accommodation is unknown and suggests the potential for accommodating extra unauthorised beds. As they are self-contained units, the ability to manage the activities of individual occupiers would be difficult compared with the inspections and registers that are required by NPWS for the Club Lodge members of SLOPES. This is unacceptable.

As a consequence of the height, mass, bulk and limited setbacks with little variation in the mass and articulation of the facades the visual impact of the development is considered unacceptable. The site is very prominent when viewed from the main arrival areas to Perisher and from Front Valley that is the busiest area for skiing especially beginners skiing. It will dominate the outlook when looking east from Front Valley. While it will not break the Main Range ridge line and skyline, it will dominate the scenery and setting abutting Front Valley.

The development will impact the views towards Front Valley and Central Perisher from the nearby lodges on Burrmys Road and above. The individual lodges will no doubt make their own submissions on this point.

5. Consistency with the Perisher Range Resorts Master Plan

Comment has already been made on the inconsistency of the development form for the Outer Precincts but where such development would be acceptable and appropriate in the future village proposed for the Central Precinct where more than 800 beds are to be accommodated above retail and commercial. SLOPES considers that resolution of the governance issues for Perisher Range Resorts could see the intention for a village centre for Perisher be realised. Nothing should compromise that long-term planning including approving higher density serviced apartment development in the Outer Precincts.

The proposed building exceeds the height guidelines of 10 metres and not just as a ridge height of a pitched roof form but including its façade height. This contributes to its adverse mass and bulk issues. The master plan complements the height control in metres by indicating that the building should be no more than 2 storeys. As previously discussed the subject building is 2-3 storeys and 3-4 storeys in height when the excessive sub-floor space is included.

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The application argues that the proposal complies with the maximum gross floor space of 25 square metres per bed but does so by excluding the living spaces in the units and the communal spaces. The actual gross floor space is 36 square metres per bed that is a direct consequence of the proposal being not in the expected form of a commercial lodge in the Outer Precincts but as self-contained serviced apartment development that must by its nature duplicate for each unit living and dining spaces rather than providing it in consolidated communal spaces. It is SLOPES' assessment that the proposal does not comply with the maximum gross floor area requirements of the Master Plan.

The Master Plan requires that buildings should not dominate the landscape in the Outer Precincts nor result in visual prominence. Both requirements are considered not met by the proposal as previously discussed. It is accepted that the site is a previously disturbed site.

The external finishes do not achieve the 15% of stone finish and the large expanses of metal cladding are not considered consistent with the natural environment of the Park and alpine setting.

While car parking provision is indicated to meet requirements, it is proposed as a widening of Burramys Road. SLOPES understood that car parking needs to be provided within lease areas. In addition, the notification plans are unclear as to whether retaining walls or other development is proposed on the sloping site to enable the provision of the carparking as an apparent widening of Burramys Road.

SLOPES notes that access for people with disabilities is proposed from Burramys Road into the ground level of the building with a ski-in access to the lower ground level from Front Valley.

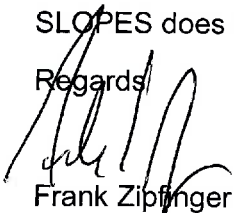
Conclusion

This submission raises a number of issues of concern for SLOPES with DA 9640 in relation to the proposed new Perisher View "Lodge". While SLOPES welcomes the investment in Perisher and the provision of more accommodation, SLOPES considers that the proposal in its current form is unacceptable and inconsistent. Furthermore, SLOPES considers that the proposal represents a significant departure from long standing planning principles for the Outer Precinct of Perisher and results in impacts as a consequence of its mass, bulk, height, limited setbacks and footprint that are unacceptable given the site's context and relationship to its surrounds.

Political Donations

SLOPES does not have any reportable political donations.

Regards



Frank Zipfing
President
SLOPES

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