



National Parks Association of the ACT Inc.

conservation education protection

The Manager
NPWS Planning Evaluation and Assessment
Locked Bag 5022
Parramatta NSW 2124

Dear Manager

RE: Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct

Thank you for the opportunity to comment on the Draft Amendment to the Kosciuszko National Park (KNP) Plan of Management (PoM): Snowy Mountains Special Activation Precinct (SMSAP).

The National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with more than 60 years of experience in helping to protect our natural environment. through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences; engagement with government policies and programs and the support of scientific research.

The NPA ACT has a particular interest in the management of KNP. NPA ACT members are regular visitors to KNP, are active participants in KNP conservation working parties and have become increasingly concerned about mounting pressures on the ecology of this national park.

Overall Comments

The SAPMP should not include any part of KNP.

The Snowy Mountains Special Activation Precinct draft Master Plan (SMSAPdMP) must be completed before any amendments to the KNP PoM are proposed. The KNP PoM must remain the prime document for the management of KNP.

The overlay of the PoM with a future State Environmental Planning Policy (SEPP) sets a dangerous precedent whereby the environmental management principles in the PoM can be overruled by a planning decision. National parks are primarily for the conservation of nature and should not be seen as areas for future development.

NPA ACT Submission on the Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct

The NPA ACT believes the draft amendment to the KNP PoM significantly threatens the ability of the PoM to deliver on its overarching principle to “maintain or improve the condition of the natural and cultural values that together make the park a special place”.

KNP faces many current and emerging threats to its ecological communities: with increasing weed and feral animal pressures and the changes occurring through human induced climate change. Already the effects of climate change can be seen through extreme weather events, changes in rainfall patterns and the impacts of bushfires that are becoming more intense and frequent.

Management of these pressures on KNP will become harder if the SMSAP is extended to include the national park as it will:

- introduce further developmental and recreational pressures; and
- override the safeguards in the current planning processes for KNP.

The proposals for KNP in the SMSAPdMP fail to take into account the medium to long term viability of the snow industry in Australia as that industry becomes increasingly affected by climate change. Proposals for significant increases in accommodation and associated infrastructure will lead to stranded assets in future years as snow levels decline. Current proposals for increased accommodation would also indicate pressure to increase the area of land in KNP covered by ski runs and associated infrastructure further compromising the fragile alpine environment.

Detailed commentary

Snowy Mountains Special Activation Precinct draft Master Plan (SMSAPdMP)

The SMSAPdMP should not include the Kosciuszko National Park (KNP). KNP has its own planning documents which take into account all environmental considerations and should not be overlaid by a SEPP. The planning within KNP is reviewed by community referenced groups, the Regional Advisory Committee and the Advisory Council, which is an entity defined by the National Parks and Wildlife Act. It will be confusing to have the KNP Plan of Management overlaid by a SEPP and to have the responsibility for the approval of planning decisions taken out of the hands of the body specifically set up to ensure that the values of KNP are not compromised through planning decisions.

When focused on the Jindabyne region outside of KNP, the SMSAPdMP is a useful mechanism for identifying ideas for the development of tourism expansion in that region. Development in Jindabyne, rather than in KNP is possible and desirable for many reasons, such as water supply, provision of sewage, and protection from bush fire danger. Expansion of accommodation in alpine resorts is not required, or wanted in KNP, especially because of the difficulties in providing such basic services as water, sewerage, transport to/from Jindabyne on snow covered roads and protection from fires.

The SMSAPdMP (page 88) “seeks to facilitate a safe and sustainable increase in the amount and range of year-round accommodation offerings in anticipation of a future decline in snow-based recreation due to climate change and to address sharply seasonal

NPA ACT Submission on the Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct

visitation profile". This suggests that greater visitation is wanted and expected in summer. However, the existing bed numbers in the alpine resorts in Thredbo, Perisher Valley and Smiggin Holes are currently not fully used in the summer seasons, so at present there is no justification in increasing bed numbers.

Thredbo precinct: the SMSAPdMP (page 90) suggests that "the Structure plans for Thredbo aim to leverage the resort's existing village character, facilitate growth in day and overnight visitors". However, the plan for Thredbo east (page 92) including a multi-deck carpark easily destroys a "village character".

The growth in overnight visitors, a proposed increase in bed numbers of 34% to 6,444 beds, similarly belies the need to retain a 'village character'. An increase in this level of bed numbers cannot be justified in light of the predicted loss of skiable snow due to climate change. The carrying capacity of the ski fields is not adequately considered. Planning to increase bed numbers before defining the long-term ability of the ski slopes to carry those additional skiers is bad planning.

In the Perisher Village precinct there is also a proposed increase in bed numbers (SMSAPdMP page 98) where "the structure plan also seeks to deliver an increase in visitor accommodation within Perisher Village to improve the current 'bed to skier ratio' ". This statement shows that the SMSAPdMP is more about the winter accommodation rather than the claimed expansion of year round activities.

Expansion of visitor numbers at Perisher village and associated sites ignores the environmental limits of the site. Changes expected with climate change will mean a less reliable supply of water and snow. The proposed 49% increase to 5,192 beds at Perisher Village cannot be supported by the forecast available water supply.

The water supply will also be in demand for snowmaking. Climate change will mean more irregular snowfalls, leading to greater demand for water for snowmaking to make skiable slopes between snowfalls. However, the water supply will be insufficient for increased snowmaking, meaning that increased accommodation structures are likely to become 'stranded assets' i.e. accommodation without a use.

The carrying capacity of the ski fields has not been demonstrated in this draft Master Plan. It is essential that this carrying capacity be determined to see if the ski fields can support the increase in winter accommodation, before development proceeds.

In addition, should the accommodation rates be realized this will significantly increase the number of skiers in the ski fields with resulting pressure on existing infrastructure including lift capacity and parking facilities. It is foreseen that this will lead to calls for the expansion of the ski areas. Such expansions will further compromise the environmental values of these high altitudinal areas of KNP by introducing additional infrastructure and on-going maintenance of the expanded ski runs.

The Perisher sewage works have long been a source of pollution of the waterways that receive treated effluent. The increase in bed numbers of 49% will mean an unsustainable

NPA ACT Submission on the Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct

load on sewage processing, and enlarged sewerage works and outfall will certainly threaten the perceived 'pristine character' of the mountains.

In the Guthega precinct, SMSAPdMP (page 104), The NPA ACT would support modest upgrades to encourage additional year-round visitation without compromising Guthega's unique character, which is influenced by its small size and relative isolation. The proposed improvement in limited camping opportunities and associated facilities for day visitors, to be developed on previously disturbed sites near Guthega dam, are supported.

SMSAPdMP (Page 110) The proposed development at Thredbo ranger station of up to 20 glamping pods is not supported. The site near the Thredbo river is low lying, waterlogged and subject to flooding, and hence is an unsuitable development site.

SMSAPdMP (page 116) Creel Bay

The development of Creel Bay with additional cottages, camping sites and day use areas is supported.

SMSAPdMP (page 120) Island Bend The proposed additional camp sites on remediated areas is supported as long as these do not lead to a degradation of the river or surrounding environment. However, camping sites need to be managed to maintain high quality grassy sites that are not overused and degraded.

SMSAPdMP (page 128) Porcupine Rocks viewing platform the NPA ACT can see not see any justification for an intrusive structure such as a cantilevered viewing platform in an open environment such as an alpine herbfield. Such a structure may be useful in a forested site where views are hard to reach, but this is not the case at this site. This platform supposedly will enhance the walking experience, but it will cause unwanted environmental damage. There will be other places on the Snowies Iconic Walk that will give the expansive views, along with the 'thrilling walking experience' without the intrusion of a large built structure.

SMSAPdMP (Page 131) Helicopter transit

The NPA ACT has strong objections to any helicopter transit flights to service transport from Jindabyne to alpine resorts. Helicopters and their attendant noise are anathema to the natural values of a national park experience. Helicopter transits, being a high-cost operation will only be used by a few high-income visitors to the detriment of much larger numbers of park visitors who will have their national park experience degraded by noise. Helicopter landing pads at resorts will be high noise impact sites, destroying the 'village atmosphere' supposedly championed in the master plan.

SMSAPdMP (Page 132) Staging

The NPA ACT agrees with the concepts of staging developments in the Jindabyne area, and the development of these being funded by private investment. It does not support the development of an Alpine Development Control Plan. While there may be willing private investors willing to develop area in the alpine resorts, the social and environmental costs of these developments will be borne by the natural environment and the visitors who do not want to use the intense urban development of those sites. And the ultimate risk should developments in KNP fail will fall to the public.

NPA ACT Submission on the Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct

Yarrangobilly Caves Precinct Plan (YCPP)

The YCPP needs to be significantly revised as key matters such as the impact of increased visitation and accommodation on the viability of the caves cave viability and the overall impact on the ecological values of the caves and surrounding karst areas are not addressed.

The creation of Japanese style bath houses (onsens) is incongruous with the overall purpose of KNP. These will be “exclusive” facilities but maintained via the public purse. The waters of the onsens will be heated through gas facilities meaning that they will contribute to an increase in carbon emissions. As such the NPA ACT strongly opposes this development.

Currango Precinct Plan.

The proposals for accommodation at Currango raise concerns about the adequacy of potable water supply and the ability to dispose of grey water and treat sewage in ecologically appropriate manner.

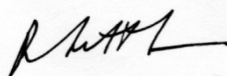
The potential for the homestead to remain open through winter (mid June - beginning of October.) also raises a number of issues. These include safe and economic access, the fact that the original buildings were not built for winter use, the source of fuel for heating, if wood is used, whether the fireplaces would be safe and whether there would adequate general fire safety.

Should you require any further information on our comments or our organisation, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee.

Yours sincerely



Esther Gallant
President
National Parks Association of the ACT



Rod Griffiths
Convener, Environment Sub-committee
National Parks Association of the ACT

23 August 2021