



**CONSERVATION
COUNCIL** ACT REGION

Submission to NPWS Planning Evaluation and Assessment: Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct.

August 2021

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

Helen Oakey, Executive Director, director@conservationcouncil.org.au.

Introduction

We welcome the opportunity to provide a letter in submission to the Draft Amendment to the Plan of Management: Snowy Mountains Special Activation Precinct (SMSAP).

Vulnerability of Kosciuszko National Park (KNP)

KNP is currently facing significant environmental stress in relation to climate change, existing infrastructure, and tourism. The impacts of these things are compounded by the park's long history of disturbance from grazing, mining, land clearing, invasive species such as feral horses, pigs and deer, and construction such as the Snowy Hydro 2 project.

The vulnerability of KNP will be heightened in the coming decades as the greatest impacts of climate change are realised. Alpine ecosystems, such as those that exist at KNP are particularly sensitive to climate change.¹ Not only will KNP suffer through increased extreme weather events, lower rainfall, and more frequent and intense bushfires, but additional stressors will prevail at the park from invasion of other ecosystems. As the earth warms, the altitudinal range of vegetation will increase, as such vegetation from lower elevations will invade alpine ecosystems such as KNP, in a process known as vegetation ingression.² This phenomenon has the potential to drastically alter the environmental values of KNP. The future effects of this process must be considered in the Plan of Management (POM) and any associated development plans.

KNP is already one of the most visited national parks in Australia, hosting 10,433 overnight beds. The amenities required to service these visitors, including, waste collection, sewerage, power, and water are historically difficult to deliver in the alpine environment. It should be noted that sewerage in particular has proved highly damaging to the alpine environments.³ To host even more tourists to KNP and necessary expansion of these amenities would put further strain on an already stressed environment.

As such, we are concerned that the proposed amendments to the POM will increase stresses onto an increasingly vulnerable KNP. The proposed amendments also introduce a dangerous precedent whereby a conservation reserve's plan of management is made subservient to other documents whose primary objectives relate to development and recreation. Of particular concern is the creation of additional resort precincts, and the amenities they require such as parking. These matters are discussed further below.

Primary Objective for National Parks

In New South Wales, national parks are "areas of land protected because of their unspoilt landscapes, outstanding or representative ecosystems, Australian native plants and animals,

¹ Climate change impacts on Australia's alpine ecosystems, Rachel Slayter, 2010.

² Alpine ecosystems in relation to climate change, Singh, 2008; Unexpected impacts of climate change on alpine vegetation, Cannone et al. 2007.

³ Environmental Impacts of Tourism on the Australian Alps Protected Areas, Pickering et.al. 2003.

and places of natural or cultural significance⁴”.

KNP is reserved under the NSW *National Parks and Wildlife Act 1974*. Section 30E of this Act, as amended in 2001, states that the purpose of reserving land as a national park is to identify, protect and conserve areas containing outstanding or representative ecosystems, and natural or cultural features, landscapes or phenomena that provide opportunities for public appreciation, inspiration, sustainable visitor use and enjoyment. The framework for balancing these objectives in KNP Plan of Management (PoM) with the overarching principle of the PoM being to “maintain or improve the condition of the natural and cultural values that together make the park a special place”.⁵

The proposed amendment to the PoM would significantly compromise the above overarching principle by making the PoM align with the objectives of the SMSAP. The objectives of the SMSAP were to improve the economic opportunities for Jindabyne region by diversifying tourism and recreation to include year round activities that were outside of KNP and in the park. The inclusion of KNP within the SMSAP introduces significant developmental and recreational pressures and moves responsibility for some development approvals within KNP away from the NSW National Parks and Wildlife Service. The proposed amendment reduces the ability of the PoM to continue to protect the core values of KNP.

Resort Precincts

The current PoM facilitates sustainable development at KNP by limiting the number of overnight beds at the park to 10,433. This limitation ensures that commercial and recreational activities do not impact adversely on the park's natural values.

By increasing the beds at KNP by some 40% as proposed in the updated PoM unprecedented strain will be put on KNPs already vulnerable natural resources. Not only will stress occur from the development of the resort precincts required to house these beds, but the development of necessary amenities to service additional people will likely have significant environmental impacts.

Currently, there is no assessment of these environmental impacts in the updated PoM. The only relevant justification is that there is demand for further infrastructure, but there is no detailed discussion of how the development of these facilities will be done sustainably. It is cited that these issues will be combated with annual reporting and environmental management plans.⁶ However, with the lack of independent oversight and environmental impact assessments the ambition to build more resort precincts and increase commercial activities at KNP could come at the expense of the Park's unique and vulnerable natural values. We urge you to consider these natural values at the forefront of decision making as the primary purpose of a National Park is not to turn profits but to protect nature. These concerns should be recognised and moderated under the PoM as opposed to annual reporting to ensure consistent and reliable monitoring of developments across KNP. The risks of failing to consider environmental impacts

⁴ <https://www.nation.alparks.nsw.gov.au/conservation-and-heritage/national-parks>

⁵ Page 21, 2006 Plan of Management Kosciuszko National Park as amended

⁶ Kosciuszko National Park Draft Amendment to the Plan of Management Snowy Mountains Special Activation Precinct, 2021, p38.

is evident in the updated PoM as the proposed resort precincts are located in areas of high conservation value.

Additionally, we would question the assumption that there is demand for significant expansion of beds in KNP. Whilst demand may exist in the peak snow season it has been reported that there is a large surplus of accommodation at KNP for the remainder of the year despite ongoing efforts to promote year round visitation.⁷ As discussed in the PoM, the length of the snow season is set to become increasingly shorter, if not non-existent due to climate change.⁸ Therefore, the investment to create 4000 more beds at KNP is arguably misplaced as potential stranded assets. Whilst artificial snow may be for use to slightly extend the snow season, the increasing costs of water and power may well render it not a viable option for the future.⁹

The Use of Gas

Finally, we would like to raise concerns regarding the use of gas in any development at KNP, but specifically emphasising the proposed heating of the Yarrangobilly Pools. Gas is not a transition fuel towards lower emissions. The extraction of gas is highly destructive to the climate as it releases significant amounts of methane, one of the most potent greenhouse gases.¹⁰ Additionally, the use of this gas is associated with many health issues including respiratory issues and neuropsychological problems.¹¹ Climate change is the biggest threat currently facing humanity, and the construction of new infrastructure to support the consumption of fossil fuels is misplaced at this time. In addition, it risks becoming a stranded asset as gas networks face significant pressure over the next decades as more and more people disconnect. We commend the updated POM for striving for KNP to become carbon neutral¹², but in order to realise this goal, it would be misguided to invest in any new gas infrastructure in the proposed expansion of commercial activities at KNP. The PoM is the appropriate mechanism to outline these standards.

⁷ Kosciuszko National Park Draft Amendment to the Plan of Management Snowy Mountains Special Activation Precinct, 2021, p2.

⁸ The Impact of Climate Change on Snow Conditions in Mainland Australia, Hennessy et, al. 2003.

⁹ Australian Energy Regulator, State of the energy market 2012, Australian Competition and Consumer Commission, Canberra, 2012.

¹⁰ Climate Council, Gas: Dangerous, Expensive and Unnecessary (Web Page, 4 February 2020) .

¹¹ Hilary Bambrick et al., Kicking the Gas Habit: How Gas is Harming Our Health (Research Report, Climate Council, May 2021) Chapter 3.1.

¹² Kosciuszko National Park Draft Amendment to the Plan of Management Snowy Mountains Special Activation Precinct, 2021, p3.