

Bushwalking NSW

Bushwalking NSW Inc. PO Box 3008, Uki NSW 2484 O: L1, 79 Myrtle Street, Chippendale P: (02)8003 5545

E: admin@bushwalkingnsw.org.au W: bushwalkingnsw.org.au [f bushwalkingnsw](https://www.facebook.com/bushwalkingnsw) [@BushwalkingNSW](https://twitter.com/BushwalkingNSW)

SUBMISSION BY BUSHWALKING NSW INC

- DRAFT PLAN OF MANAGEMENT -

KOSCIUSZKO NATIONAL PARK

Introduction

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from nearly 70 bushwalking clubs throughout the state, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

In preparing this submission, Bushwalking NSW has reviewed the following documents released at the same time:

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

Bushwalking NSW has also been informed by comments and suggestions by representatives of our member organisations and other affiliates.

While our submission has a focus on bushwalking, we recognise that our member organisations undertake other recreational activities such as mountain biking and cross-country skiing. Where these are relevant, we have made comment on other activities. As bushwalkers we also have a strong connection to environment and have made comment on environmental issues where this is warranted.

Planning Process appears to be back to front

The Snowy Mountains Special Activation Precinct Draft Master Plan appears to be driving the changes proposed in the Alpine Precinct and the concurrent amendments to the Plan of Management are simply to give legal effect to these changes. The Kosciuszko National Park Plan of Management 2006 is the principal planning instrument for the National Park.

Page xvi of the 2006 Plan states:

Kosciuszko National Park is a special place. It contains the highest mountains on the Australian continent, unique glacial landscapes, and unusual assemblages of plants and animals, a number of

which are found nowhere else. It also encompasses significant water catchments, the principal seasonally snow-covered region in Australia, and extensive tracts of forest and woodland in the most densely populated corner of the nation. Layers of cultural remains, histories and meanings are superimposed on all of this country.

It is difficult to see how the proposals for the Alpine Precinct are consistent with the sentiments expressed above. Rather the Master Plan has established a tourism demand driven model and seeks to justify how the National Park can be altered to fit this demand. Effectively to urbanise a section of the National Park.

Will this eventually result in a de-gazettement of the Alpine Precinct from the National Park?

The objects of the National Parks and Wildlife Act 1974 No 80 give primacy to conservation of natural and cultural values and to foster a public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation.

Recreational and commercial activities may be appropriate in national parks, but only where they are consistent with the core conservation objectives of reservation.

The Master Plan overturns the planning hierarchy for national parks. Instead of the Plan of Management defining the limits of future development and activities after careful analysis of the values and threats of a specific park, the current process is unashamedly designed to increase commercial access to, and returns from activities within the National Park.

The Master Plan represents a departure from these values and seeks to impose a new set of objects that favour development over conservation. This is planning back to front. The Kosciuszko National Park Plan of Management should be the principal planning document. If the development proposals contained in the Master Plan are warranted, then the NSW Government should prepare and exhibit a new Plan of Management.

Kosciuszko National Park, a precious and vulnerable national park: can the National Park absorb the development pressures envisaged in the Master Plan?

The NSW Government's video introducing the Master Plan claims that Kosciuszko is 'pristine' and 'environmentally resilient'. This is a strange claim as it ignores the many development pressures and threats that are impacting the National Park. The sources of this impact include:

- historic clearing, grazing and mining which in some places has yet to be fully rehabilitated;
- the escalating impacts of climate change, which are an underlying cause of the most intense wildfires in recorded history;
- destruction of habitats from introduced pests such as feral horses, pigs and deer;
- un-rehabilitated scars of Snowy Hydro's former construction sites;
- historic and continuing environmental impacts from the resorts;
- massive scale clearance and construction works by the Snowy 2 project; and
- unnecessary proposals for new overhead transmission lines across the park.

The National Park is also under extreme environmental stress from the existing level of development and use. The National Park is amongst the most heavily visited national parks in NSW and contains far

Submission By Bushwalking NSW Inc - Draft Pom Amendments - Kosciuszko NP-Final.Docx Aug 2021

more accommodation than any other national park in Australia, with 10,000 overnight beds. All visitors need basic services such as sewerage treatment, waste collection, road maintenance, power and water. These services are difficult to deliver in the alpine setting, and some, notably sewerage treatment, have a history of causing significant environmental damage.

The Master Plan and, by default, the concurrent Plan of Management Amendments seek to apply a concept of carrying capacity to the planning process. As stated on page 28 of the Master Plan:

In the context of the Snowy Mountains, carrying capacity can be defined by the extent to which the region can cater to visitor activities, facilities and services while protecting its unique environmental values.

However, analysis of carrying capacity remains a work in progress. It would follow the adoption of the Master Plan and the Plan of Management Amendments. The question is why? Surely an understanding of carrying capacity should determine an understanding of how much development the National Park should absorb, not something to be undertaken once the statutory planning process has been completed. It seems to be that the National Park will be modified to fit in with some pre-determined level of development and the environmental consequences simply brushed aside.

Fifty years ago, the Scottish landscape architect Ian McHarg developed the notion of 'design with nature': the way we occupy and modify the earth is best when it is planned and designed with careful regard to both the ecology and the character of the landscape.

The changes envisaged for the Alpine Precinct do not design with nature and should be withdrawn and revised.

A National Park, not an urban development site

The Plan of Management Amendments would effectively transfer much of the responsibility for development within the National Park from the National Parks and Wildlife Service to the Department of Planning and the Department for Regional NSW. This has been acknowledged in recent media reporting about the Master Plan (refer to 'Helicopters and glamping: Snowies will never be the same' The Sun Herald August 8, 2021).

This should be unacceptable in a highly sensitive, extremely significant protected area and responsibility for managing the National Park should be implemented through the Plan of Management by the National Parks and Wildlife Service.

We fear that this is the first step in de-gazetting the Alpine Precinct from the National Park and transferring governance to the Department of Planning or Department for Regional NSW.

The Resort Precincts

The chief concern here is that the projected increase in overnight bed accommodation (and all the associated services with it) seems to defy climate change projections that will push the natural snowline well above the current resorts. Artificial snow making may simply be too uneconomic to replace natural snow. Even with the development of the resorts as summer or 'green season' recreation hubs, the expansion of the resorts may simply result in stranded assets over the next decades. This scenario is not pursued in the Master Plan or Plan of Management Amendments.

The proposed resort precincts are distributed across a significant area of the National Park and large areas of native vegetation will need to be cleared. A central objective of previous management plans has been to limit the loss of natural habitat by confining the resorts to the existing development footprint.

There are many environmental concerns with an expanded resort footprint but we will highlight four which our affiliated clubs and members are well familiar with.

Helicopter commuting between Jindabyne and the Resorts

The Kosciuszko National Park attracts visitors because it offers the opportunity to immerse in nature and to remove oneself (even if temporary) from the pressures and stresses of contemporary life. It is the solitude and quiet which attracts people. Not all but many.

Helicopters are intrusive. They make noise. Their regular presence in other national parks already detracts from the 'quiet enjoyment' of others. Why introduce this to Kosciuszko National Park? We also fear that opening the National Park to helicopter flights to and from the resorts will eventually lead to scenic flights over nearby attractions such as the Main Range and the higher peaks. Just a short detour for some low flying scenic flights as passengers are being transported to and from their resort.

We perceive helicopter commuting as the first step in wider helicopter tourism across the National Park. It should not be sanctioned as part of the Plan of Management.

Light Pollution

This is ignored in the Master Plan and Plan of Management Amendments. Light pollution is already a problem in the National Park. For example, light from the resorts can be seen at night from the Main Range. Any expansion of the footprint of the resorts needs to address the additional light pollution and how this will be mitigated.

Road Traffic Hazards from Feral Animals

The resort expansion projects an increase in car parking at the resorts to accommodate assumed increased visitor numbers. This will lock in increased usage of private cars and increased usage of the roads between the National Park and nearby towns such as Jindabyne.

Feral animals particularly large herbivores are a significant problem for the management of the National Park and as well as the environmental impacts, the risk of collisions between these animals and cars is real and there are regular accidents and near misses along local roads. Indeed, our members report that the risk of a collision with a horse or deer is becoming a deterrent to travelling to the National Park.

The planning documents are silent on this issue.

Commuter Vehicle Support on the Summit Trail

This proposal is documented in the Plan of Management Amendments.

The Summit Trail is a walking track. It is not a track for vehicles other than for emergencies and park management purposes. Vehicles for the convenience of visitors should not be permitted. Visitors should be able to drive to Charlotte Pass and no further.

Where do the world -renowned walking tracks fit in here?

The National Park is a premier destination for outdoor recreation, including opportunities for 'back country' recreation in both the 'white' season and the 'green' season.

However, it is surprising that no mention is made of recreation assets such as the Australian Alps Walking Track. This actually crosses the western edge of the Alpine Precinct. It is arguably one of the most challenging walking tracks in Australia and attracts visitors both from Australia and overseas. A few walk the whole way over many weeks, some access it for weekend walks, many access it for day walks.

It connects with the Main Range and beyond to the Jagungal and Pilot Wilderness Areas. It also connects with the Snowies Iconic Walk now under construction.

However, one would never know reading the Master Plan or Plan of Management Amendments. The planning documents read as though the only people who would want to use these tracks are 'well heeled' visitors who need helicopters and vehicles to get about.

Both the Master Plan and Plan of Management Amendments need to be revised to recognise the diversity of people who want to recreate in the National Park. Some market research on groups such as the people we represent would have been useful in understanding why the National Park is important to us.

A better future for Kosciuszko?

The Commonwealth Government recently announced that Australia has joined the international alliance 'the high ambition coalition'. The centrepiece of the membership of the alliance is to halt the loss of biodiversity by protecting 30% of our land and sea in conservation reserves.

We have a long way to go to get anywhere near the 30% target. That task will be fatally undermined if the existing conservation reserves, such as Kosciuszko National Park, are not protected from land clearance, infrastructure development and other inappropriate uses.

Bushwalking NSW Inc does not accept that the Kosciuszko National Park would be enhanced by the development proposals that would be facilitated by amending the 2006 Plan of Management. We consider that these proposals are a threat to the environmental and cultural values of the Alpine Precinct and beyond.

The Plan of Management Amendments should be withdrawn and revised.

Submission prepared by the Management Committee of Bushwalking NSW Inc.

Submission By Bushwalking NSW Inc - Draft Pom Amendments - Kosciuszko NP-Final.Docx Aug 2021

18th August 2021

Enquiries to conservation@bushwalkingnsw.org.au