

BACKGROUND INFORMATION FOR ASF CLUB SUBMISSIONS ON THE
DRAFT YARRANGOBILLY CAVES PRECINCT PLAN 2021.

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General Comments:

The draft Yarrangobilly Caves Precinct Plan (YCPP), has been released for public consultation. The plan is part of a suite of 'Special Activation Plans' (SAP's) concerning Kosciuszko National Park and the Snowy Mountains area in general. The money for the proposed developments outlined in these plans is coming from the \$4.2 billion Snowy Hydro Legacy Fund.

Collectively, these plans aim to develop an all-year-round tourism industry in the KNP and the Snowy Mountains region in particular. This translates as increasing bed numbers in all sections of the KNP, (Thredbo, Smiggin Holes, Perisher, Charlotte's Pass, Sawpit Creek, Is Bend, Cotterills, Kiandra) providing more tourism experiences, tapping into the adventure tourism market, increasing the number of walking paths, mountain bike trails and consequently building more hard surface infrastructure, car parks, housing etc, within the KNP.

These three plans substantially shift the emphasis away from environmental protection and management of some of Australia's national and internationally important landscapes to that of commercialisation. This is at odds with the NSW National Parks and Wildlife Act, 1974 and the Kosciuszko Plan of Management to name but two.

The points raised below pertain only to the YCPP, are of a general nature providing a few suggestions as to arguments that could be used in submissions. *Clubs will need to read the YCPP closely and make their own comments on the details of its proposals.*

Some 'Highlights' of the Yarrangobilly Caves Precinct Plan.

The aims of the YCPP are:

- Enhancing visitor experiences
- Protect and conserve the site's natural and cultural heritage values
- Increase visitation across the year
- Broaden revenue streams
- Increase revenue and maximise net revenue
- Increase, develop and maximise regional tourism/ commercial partnerships
- Improve efficiency of managing and maintaining the sites

The development proposals to achieve these aims in the Yarrangobilly Caves Precinct include but are not limited to:

- Building more accommodation, increasing bed numbers from 42 to 94 despite the fact that the current accommodation has only a 50 percent occupancy rate! (YCPP p.44)
 - The new developments include: 9 additional 2 & 3 bedroom visitor accommodation buildings, and a new staff accommodation cottage sited on the edge of the karst above Caves House (with the latter being adjacent to the sewage treatment plant which is noisy!). For examples of the type of housing, envisaged see:
 - <http://rollinghuts.com/> and <https://www.jawsarchitects.com/architecture/nomad-pods>
- Converting the existing Visitor Centre into a café with 390sqm of outdoor dining and building a new Visitor Centre.
 - A new Visitor Centre is needed, where it is to be placed needs careful consideration. Instead of converting the exiting building to a café, the existing visitor centre could

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highlight heritage values and perhaps showcase some of Australia's speleological heritage.

- Increasing the frequency of show cave tours.
 - We know from past experience that overuse of show caves causes significant and perhaps permanent damage to cave environments via lampenflora, silt and flint build-ups, changes in airflows due to opening and closing of doors, etc.
- Building a number of 'ecopod' self-contained cottages in the Rules Ck catchment.
- Major re-developments around and down to the thermal pool, including:
 - Building Japanese style bath houses next to the Yagby River, powered by gas, and presumably releasing this hot water and treatment chemicals into the river itself.
 - The plan states that "these are to be booked and available for families or couples. The visitor is to have an immersive and natural an experience as possible". As an example of this type of development see the below link which shows the New Zealand, Queenstown experience. They charge, NZ\$87/hour/1 person, or 2 adults for \$126.00. <https://www.onsen.co.nz/hot-pool-massage-experiences/>
- A proposed walking track from the show caves precinct to Yan's Crossing.
 - This is really a repeat of the mountain bike trail proposal that was successfully defeated back in February of this year! It is back in this plan following the River to Yan's Crossing and finishing at Yarrangobilly Village. Although the exact route is not defined, it will, given the nature of the terrain, require extensive infrastructure development involving soil and vegetation disturbance and water runoff on the riverine and karst landscapes it traverses.
- Provide 'visitor product experiences' such as:
 - Guided Caving Adventure tours – provide an adventure caving passport.
 - Wellness retreats, writers retreats, Eco tours of the precinct, Canoe trips from Yarrangobilly Village to the Caves Precinct, Commercial aboriginal operated tours of the precinct.
 - Overnight guided walking tours.
 - Are these tours going to impact karst ecology?
 - Do these guided walks exclude those wanting to do overnight walks without a paying guide?

There are a number of possible themes that could be used to address some of the proposals in the YCPP.

Here are a few:

1) Promote the value of karst landscapes. There is a lack of understanding of this in the YCPP and how the planned developments impact the karst involved.

- Emphasize the importance of the Yarrangobilly Karst region to the national and international estate as stated in the KPOM.
- That this landscape needs significant protections via the fundamental tenets of karst management principles. In particular, actions that occur on the surface translate into

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impacts directly underground and downstream¹ See IUCN *Guidelines For Cave And Karst Protection*.

- Emphasise the value of what we, as speleologists do: the collaborative nature of our research with cave managers, scientists and the wider community. That our surveys, photo monitoring, environmental work, informs why we care about carrying capacities of caves: protecting troglobitic species, vegetation that is specific to karst landscapes, Minimal Impact Caving Code and its adoption by cave managers nationally, etc.
- Emphasise the importance of environmental monitoring: Cave climates, bushfire impacts, troglobitic fauna, damage via foot traffic in cave environments, disturbance to vegetation, impacts on stream sinks etc

2) Appropriateness of these proposals.

- Reiterate the importance of the Kosciuszko Plan of Management (KPOM) aims, as these underlie all developments with the Park. The key principle of the KPOM is the ‘imperative of maintaining or improving the condition of the natural and cultural values that together make the park a special place’.
- Do any of the proposed buildings, tracks, increased visitor numbers and planned “Product experiences” improve the condition of the natural and cultural values of Yarrangobilly, its caves and karst landscapes?
- There is a lack of understanding of the impacts of these proposals on Aboriginal heritage, song-lines, spirit life.
- Given climate change, frequency and intensity of bushfires should the proposed development occur at Yarrangobilly at all?
- The proposed ecopod accommodation area, (in the current picnic area) is on karst, as is the current Visitor Centre. Rules Ck runs under it. The area is at the base of the valley, is cold, & gets very little sun.
- Do the proposals meet the requirements of the NSW National Parks and Wildlife Act, 1974? It states: “*The objects of this Act are to be achieved by applying the principles of ecologically sustainable development.*”
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- Or the NSW Heritage Act, 1977, Wilderness Act 1987 and the Federal, Environmental Protection, Bio-diversity Conservation Act? Any developments within the YCPP and KNP are bound by these Acts.
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- Need for wild places, low intensity visitor experiences. Not every place needs to be a Thredbo/Jenolan repeat.
- Proposals are catering for the high end of the market. This is socially divisive and removes public claim to property that we all own.
- The proposals seem to be lining up the Yarrangobilly Show Cave Precinct and by default caves in the Yarrangobilly karst area for private gain via lease arrangements,

¹ See IUCN *Guidelines For Cave And Karst Protection*. Appendix 4. p.44

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outsourcing of visitor experiences. Note the plans in the Snowy Mountains Special Activation Plan, (SAP).

3) Issues of sustainability:

- Cave tours, there are limits that cave environments can sustain. Regeneration of these environments take millennia, not a few years.
- There is no mention of any environmental monitoring to be undertaken as a result of these proposals. Nor of any during the development of the proposed building works.
- How are staff going to be attracted, trained and retained, given that the plan calls for major increases in: the number of cave tours into the show caves, the development of guided overnight walking tours, guided adventure caving trips as well as staff the café, ticket office?
- Water to run all newly established accommodation requirements. This is currently coming from the Rules Ck, but Rules Ck in summer has very low flow rates. If more water is needed then is the Yarrangobilly River going to be used? If so where is the infrastructure going to be placed?
- Issues of power generation. Diesel, Gas, hydro and solar
Gas is being used to supply heating in parts of Lyrebird Cottage, and heat the hot water in Caves House. The gas heaters in 1901 wing of Caves House have recently been replaced by hot water radiators (heated by electricity, i.e, hydro or diesel). (John Brush, Pers Com.)
Gas is proposed to heat the water for the exclusive use Onsen bath houses. The plan has proposed the establishment of e-charging stations.

The 2020 bush fires seriously damaged the hydro power Infrastructure this has now been repaired. There are now two new diesel generators being used to supply power.
How environmentally and financially sustainable is this given the expected increase of demand?
- What is the impact on the existing sewerage plant and infiltration system of the expanded accommodation plan? The current effluent soil infiltration drainage system takes it to the southern edge of the karst, towards the river.
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- Where is the feasibility study that supports this development?

4) Movement towards privatisation of services and experiences in the Yarrangobilly Caves Precinct and within the whole of KNP.

- There has been for some time a push to implement private-public partnerships (PPP), across a whole range of sectors that once used to be the sole domain of public ownership from heritage listed buildings to Chairs at Universities. The move to include national parks in this process is not new.
- Does planning to offer, adventure tours into wild caves, increased tours into the show caves and tour packages, mean restricting speleological access to caves, thus ensuring a decline in the knowledge that speleological activity creates?

Here are the links to the plans:

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1) Kosciuszko National Park Plan of Management

<https://www.environment.nsw.gov.au/research-and-publications/publications-search/kosciuszko-national-park-plan-of-management>

The Kosciuszko National Park Plan of Management, (KPOM). This is the overarching document that informs the basis of all plans/amendments relating to specific sections and activities in the park. You will need to refer to this document when making comments on the Yarrangobilly Caves Precinct Plan.

2) Yarrangobilly Caves Precinct Plan

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Parks-management-other/kosciuszko-national-park-draft-yarrangobilly-caves-precinct-plan-210165.pdf>

3) Snowy Mountains Special Activation Plan:

<https://www.planningportal.nsw.gov.au/snowymountainssap>

This plan has a forty-year outline of development plans slated for the entire area, note its aims and compare with the KPOM.

4) Currango Homestead Precinct plan:

<https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-management/community-engagement/kosciuszko-national-park/currango-caves-precinct-plan>

Let's build more horse-riding opportunities with the idea of lease arrangements which may well result in exclusive use.

Other useful resources:

Yarrangobilly Caves House Precinct Conservation Management Plan Review. 2002. NSW National Parks & Wildlife Service Cultural Heritage Division and Yarrangobilly Caves.

http://libtest2.caves.org.au/cgi-bin/koha/opac-detail.pl?biblionumber=804&query_desc=ti%2Cwrdl%3A%20yarrangobilly

Click on the "Online Resources ASF Library " holdings link to take you to the file.

Ellis R. and Halbert E., (Eds.) *Caves and Karst of Yarrangobilly*. 2015. Sydney Speleological Society Occasional Paper No 19. Sydney.

Spate A. Baker Andrew., *Karst Values of Kosciuszko National Park A Review of Values and of Recent Research*. 2018. Proceedings of the Linnean Society of New South Wales 140, 253-264. Available at: <https://openjournals.library.sydney.edu.au/index.php/LIN/index>

Watson, J., Hamilton-Smith, E., Gillieson, D. and Kiernan, K. (eds) *Guidelines For Cave And Karst Protection*. 1997. IUCN (World Conservation Council), Gland Switzerland and Cambridge UK. <https://portals.iucn.org/library/sites/library/files/documents/1997-026.pdf>

On Private - Public Partnerships.

Spenceley, A, Snyman, S and Eagles, PFJ. 2017, *Guidelines for tourism partnerships and concessions for protected areas: Generating sustainable revenues for conservation and development*, Report to the Secretariat of the Convention on Biological Diversity and IUCN, IUCN World Commission on Protected Areas Tourism and Protected Areas Specialist Group. <https://portals.iucn.org/library/node/48403>

Public Consultation closes on the 23rd of August.

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Send submissions relating to the Yarrangobilly Caves Precinct Plan and all others to:

- Post written submission to:
Manager, NPWS Planning Evaluation and Assessment
Locked Bag 5022
Parramatta NSW 2124
- Email your submission to: npws.parkplanning@environment.nsw.gov.au

References that may be useful.

NSW National Parks and Wildlife Act.

<https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-1974-080>

The Federal Environmental and Biodiversity Protection and Conservation Act 2000.

https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1819/Quick_Guides/EPBC

Links to relevant politicians.

Here are links to some politicians you could ring, or write to. This issue is not going to go away. Ring your local MP and raise the issue.

The Greens NSW MLC: David Shoebridge, get him to ask questions on the floor of the House. Write the questions for him.

David.Shoebridge@parliament.nsw.gov.au

These go via: Kym Chapple

Senior Advisor

Policy | Communications | Legislation

02 9230 3030

Office of Greens MP David Shoebridge

Also, definitely worth ringing up Opposition Shadow Ministers in both NSW and at the Federal level. See:

NSW:

Penny Sharpe MLC (Legislative Council)

Leader of the Opposition in the Legislative Council

Shadow Minister for the Environment

Australian Labor Party member Phone (02) 9230 2741

Fax (02) 9230 2589

penny.sharpe@parliament.nsw.gov.au

Federal:

Terri Butler,

Shadow Minister for the Environment and Water. (Holds the seat of Griffith, Brisbane)

Phone: (07) 3397 1674

Email: Terri.Butler.MP@aph.gov.au

Office Address: 76 Old Cleveland Rd, Greenslopes QLD 4120

Postal address: PO Box 737, Coorparoo QLD 4151