

NATURE CONSERVATION COUNCIL OF NSW Inc.

Level 5, 362 Kent St, NSW SYDNEY 2000
Ph: 02-9279 2466 Fax: 02 9279 2499
Email: ncc@nccnsw.org.au
Website: <http://www.nccnsw.org.au>



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Mr Jim Cox
Chairman
IPART
PO Box Q290
QVB Post Office NSW 1230

Perisher@ipart.nsw.gov.au

Dear Mr Cox

Submission to IPART Review of Infrastructure Pricing at the Perisher Range Resorts

The Nature conservation Council of NSW (NCC) is the peak council for some 120 non-government environment organisations in NSW. NCC has a long-standing interest in the management of Kosciuszko National Park and ski resorts within the Park.

In this submission we briefly outline some NCC concerns and the principles which should guide infrastructure pricing at the Perisher Range Resorts.

We note that a consultant is to be engaged by IPART to assess the infrastructure and NCC would like to reserve the right to make further comment in the light of the consultant's report, if appropriate.

We note from the Discussion Paper that IPART discourages input on a range of matters including the implications of climate change (said not to be relevant to the 5-year price path). NCC questions this exclusion (among others) as the NPWS "Perisher Range Resorts Infrastructure Services Strategy" is a plan for the provision of services some 30 years into the future. Further, IPART's Discussion Paper seeks comment on likely future visitor numbers at Perisher and the factors (such as climate presumably) which influence these visitor numbers.

We are also concerned that the terms of reference for the review as indicated in the NSW Treasurer's request to IPART (Discussion Paper Attachment A) suggests that the capital works program should only meet "current minimum public health, environmental and occupational health and safety standards". The Tribunal in its Discussion Paper further states that higher than minimum standards may be required "if they are cost-effective".

At the commission of Inquiry into the (then) proposed Perisher Range Resort Area Village Centre Master Plan in 1998, the NPWS showed how poor management and design at Perisher Resort were impacting on the Park and needed to be addressed. Stormwater and solid waste management were flagged as important issues.

NCC expects pricing of infrastructure to meet an absolute standard that protects the Park's natural values in accordance with the requirements of the NP&W Act and the Park Plan of Management. These requirements are quite likely to be greater than current minimum standards applying in the general community, especially in the case of stormwater, which has a high potential to impact on the threatened species habitats in close proximity to resorts.

NCC supports the "user pays" principle in infrastructure pricing and we note from the Discussion Paper that this is government policy. For the Perisher Range resorts, "user pays" implies that the commercial operators and club lodges should fully meet capital and operating costs in proportion to the benefit they derive from the facilities and should recoup these costs from their patrons/members.

NCC would also support a pricing structure for entry fees to Kosciuszko National Park (and Ski Tube) as long as it accurately reflects visitors' actual use and benefit from resort infrastructure. Surcharges on car parking fees and lift tickets are also seen as reasonable approaches provided that in each case the amount paid can be matched to the use of the infrastructure. These contributions must not be a subsidy to the resort interests.

NCC favours the Tribunal's suggestion of "step pricing" as this can operate as a demand management measure controlling visitor numbers and overuse of infrastructure.

The Discussion paper's suggests that infrastructure supplied in the past might not be brought into account. This is strongly questioned. Commercial operations have been undertaken profitably in the resorts for many years and if there ever was a case for subsidy that time passed decades ago.

Finally we regret that the background information supplied by IPART and the NPWS for the purpose of this pricing review is quite poor.

Please direct any questions concerning this submission to Peter Prine as, who is a member of NCC's Executive and familiar with Kosciuszko National Park management issues.

Yours sincerely,



Robert Pallin
Chairperson