



Falls to Hotham Alpine Crossing (FHAC) Draft Designs

17/09/2022

Parks Victoria
Via email: engage@parks.vic.gov.au

Dear Sir/Madam

Thank you for the opportunity to participate in the Falls to Hotham Alpine Crossing (FHAC) Draft Designs consultation process. It is critical that community, particularly those actively accessing and experiencing the remote and natural landscape, have the opportunity to share their views.

Introduction

Victoria's Alpine National Park (ANP), with its powerful, spectacular, and distinctive landscape, has a special association with the Australian community because of the unique landscapes, naturalness, experience of remoteness and as one of the few opportunities for broad-scale outdoor recreation in Australia. The ANP is widely recognised by Australians as the 'high country' and many community groups have a special association with the ANP for recreation, mental health, social and cultural reasons.

As you are no doubt aware, Australia's national parks in several states are under threat of privatisation with developers and land managers using the lure of ecotourism to construct private lodgings with exclusive access deep inside these iconic parks. While the master plan identifies potential benefits to the environment, community, and visitors. I do have objections that need to be raised and adequately considered.

There is a real danger with inappropriate developments in precious parts of nature. We know nature is good for our mental health – and the wilder the better. One in five Australians report at least one episode of mental illness in the previous year. The Parks Victoria's [own website states](#):

- *Growing scientific evidence and generations of traditional knowledge show that spending time in nature is good for our mind, body, and soul. Community groups, schools, governments, health authorities and recreational organisations worldwide are tapping into the healing power of nature. Viewing natural scenes lowers blood pressure, reduces stress, and boosts wellbeing, put simply, nature is good for you.*
- *Our stunning parks, coastlines, forests, and mountains play an important role in fostering happy, healthy, and active communities. Conserving parks for present and future generations provides inspirational and therapeutic settings that foster lifelong connections with nature and each other. Parks that are valued and maintained are also fundamental to economic growth and vibrant and healthy communities.*

[Research shows](#) protected areas in Australia boost the mental health of visitors, seen in productivity gains of up to 11% for people who visit at least once a month. Nationwide, that means our national parks give us a productivity gain of 1.8% and cut healthcare costs by 0.6%. Studies found the therapeutic effects of nature for mentally unhealthy park visitors are 2.5 times greater than for mentally healthy visitors. Access to nature in national parks is one of the few free mental health boosts available to the less well-off as well as the wealthy. If inappropriate developments and



privatisation takes root in our parks – adding additional campsites and expensive accommodation – those who most need the boost from nature will find it harder to acquire.

While the aim of Park Victoria may be to unlock the power of nature and parks for their preventative and restorative health and wellbeing benefits and visitors to ecotourism developments report improved wellbeing and mental health, the issue is around access for all. Commercial developments exclude the wider public, both physically and financially. Some 70% of Australians visit a national park at least once a year. These visits reduce national healthcare costs by A\$12.3 billion a year and increases economic productivity by A\$35 billion a year.

This is not to say tourism venture have no place. Commercial nature tourism businesses can benefit, and contribute, by guiding inexperienced visitors to visit national parks. But the parks themselves, and all their facilities, should remain publicly owned and accessible to all.

1. **My first concern** is in relation to the identified need which states the problem as:
 - *Lack of a hero walking experience in the region is limiting potential visitation growth*
 - *Lack of diverse overnight accommodation and product options along trail is limiting accessibility for a range of users*
 - *Current funding model for infrastructure is inadequate to deliver ongoing maintenance leading to poor visitor experience*

While Parks Victoria may argue that the FHAC development will increase opportunities for all Victorians to have connections with nature, the reality is, these opportunities already exist in many of the wonderful Parks and Reserves throughout Victoria. Parks Victoria should not be taking opportunities away from, or imposing infrastructure developments on people who already enjoy the remote wilderness regions of our state. Our society is underpinned by an entitled view of all things, access to nature should not be one of them. We are here to protect, not exploit our natural world. It is concerning that none of the 'problems' relate to biodiversity or conservation. I would like to remind Parks Victoria of its primary responsibility to ensure parks are healthy and resilient for current and future generations. To protect and enhance environmental and cultural values. It is not its role to develop parks for tourism and I reject the observation that current infrastructure is inadequate and leads to poor visitor experiences.

The business case states, on page 16:

- *Without investment in the FHAC, the region will fail to capture the available market share of those wanting to participate in a truly iconic Victorian overnight walk and impact the surrounding High-Country community both socially and economically.*

I reject this claim. There is one such iconic walk within the Victorian High country that already has trails, campsites, and high-country huts in place. [The Buller Huts Trail](#). This trail is already recognised and visited by a range of domestic and international travellers. Why this existing infrastructure is not being utilised, to lessen new impacts on the wilderness, is unknown.

2. **My second concern** relates to the **National Parks Act 1975 Preamble** which states; *WHEREAS it is in the public interest that certain Crown land characterised by its predominantly unspoilt landscape, and its flora, fauna, or other features, should be reserved and preserved and protected permanently for the benefit of the public.* Note the preamble refers to '*benefit of the public*'. It does not refer to commercial benefits or access for only those who can afford to pay. The



ANP was gazetted on the National Heritage List in 2018 as part of the Australian Alps due to its unique natural environment. It is the obligation of government and its agencies to preserve and protect these natural environments for future generations, not turn them into commercial tourism playgrounds, competing for the inbound tourist's dollar against other states and regions.

3. My third concern refers to the **NATIONAL PARKS ACT 1975 - SECT 21C: Protection of remote and natural areas**. I refer specifically to the Bundara–Cobungra Remote and Natural Area (RNA) which is traversed on day two of the FHAC. As this RNA is of national significance, I believe it is critical that no trail realignments or upgrades take place and no overnight nodes or signage be constructed within this RNA. I refer to the act which states;

S. 21C(2) amended by Nos 70/1998 s. 14(Sch. item 15), 19/2018 s. 175.

(2) Parks Victoria must ensure that, in a remote and natural area—

- (a) no new roads or tracks for vehicles are constructed; and
- (b) existing roads or tracks for vehicles are not widened or upgraded in any way so that they can carry increased traffic or heavier vehicles; and
- (c) no new structures are constructed; and
- (d) no new facilities are installed; and
- (e) no new works are carried out that will adversely affect the natural condition or appearance of the area.

(3) In subsection (2) "works" includes, but is not limited to, any of the following—

- (a) excavation and earthworks;
- (b) destruction, removal or lopping of vegetation.

4. My fourth concern is that the FHAC proposal is contrary to Victorian government (ALP) policy that *"It is still government policy that tourism development will be encouraged to be sited on private or other public land outside national parks"*. (Ministerial answer to question 848 asked by Clifford Hayes in October 2019). While the Government policy does allow for selected private investment inside a national park under a lease of up to 21 years, the FHAC is a situation where a Government Committee is actively campaigning and planning to spend \$34M of public funds for a development that will then be opened for licences private operators. The private operators will benefit from the public expenditure and recreational walkers, who frequent this region, will be pushed out. I ask you to confirm that commercial or privately licenced development will be sited on private or other public land outside National Parks and National Heritage Listed sites.

5. My fifth objection is that the development is opposed by most stakeholders. Following a process of public consultation, there was overwhelming public rejection of the FHAC in its current form. Between 85 and 90% of the written submissions rejected the current FHAC proposal. The FHAC Master Plan should acknowledge and accept the community response. However, the official summary of the responses concluded that, *"Overall there was a positive response to the plan and its potential positive impact to the region"*. This is a blatant embellishment of the facts. Documentation has understated and misrepresented the level of public rejection in favour of potential tourism revenue derived from the lucrative inbound adventure tourism sector.

6. My sixth objection is that the effect of the FHAC as described in the Management Plan is in opposition to the Victorian government's values around social equity. While the current business plan does not identify specific overnight private accommodation costs, it does provide benchmarking that averages \$676.80 per visitor per night. Overnight fees of this magnitude and privatising the use of huts will effectively displace lower income walkers in favour of wealthier



tourists. I recognise that cheaper tent platforms and dispersed campsites may be provided for self-reliant walkers, but this is no different to the status quo and provides absolutely no advantage in terms of improving current accessibility. As far as possible, income should not determine access to Victorian National Parks and other reserves. The baseline should be that no action impedes access to reserves on the part of traditional low budget travellers. Replacing current affordable access with higher-priced access is a step away from social equity and fairness.

7. My seventh concern is the likelihood that \$34M of taxpayer dollars will be wasted due to poor economic analysis in the Master Plan. This includes the projected walker numbers and the estimated benefits including multipliers. I note on page 5 of the business case, that full implementation costs have been removed. I ask Parks Victoria to commit to a publicly available Business Case that is open to public comment before further funds are committed.

8. My eighth objection is that the FHAC is a poor option for local business. The plan for “on mountain hut-based commercial accommodation” rather than “lodge with daily transport” model will be the least desirable option for local business at Falls Creek, Hotham, and Harrietville. Better models exist in the Great Ocean and Grampians scenarios. The route proposed by the Master Plan is likely to lead to a model that excludes local business from accommodation provision during the FHAC. There is substantial unused accommodation at the local tourist hubs in the non-snow season and using this would benefit local business far more than the proposal in the Master Plan. Both the Great Ocean and Grampians scenarios allow for a day visitor model utilising day transport to and from local accommodation. The current FHAC does not facilitate this. Feedback on a publicly available Business Case will demonstrate better opportunities for local business.

9. My ninth concern is that the FHAC as currently proposed will have a major detrimental environmental impact on sensitive areas within the Alpine National Park. This will include major earth works, excavation, construction, helicopter intrusion, increased traffic, removal of human waste, servicing, and maintenance of facilities. One thing the FHAC would have in common with the Three Capes development in Tasmania is the absolute destruction of wilderness. Construction of the Three Capes Track significantly degraded the wild character of Tasman National Park and the project has received substantial criticism from the public and conservation groups. The proposed FHAC development would destroy some of the highest-quality remote wilderness in Australia.

As custodians of our wilderness, Parks Victoria have been appointed to protect this powerful, spectacular, and distinctive landscape. While I applaud the efforts of Parks Victoria to improve accessibility for all, the reality is, not everyone has to have access to all locations, and certainly not when they must pay for the privilege.

I’m not opposed to small public huts on public lands and have utilised them myself in the high-country for day-time shelter from the elements. However, huts shouldn’t be prolific, nor should they be privately owned. If huts are to exist, they should be like those in New Zealand’s network of Department of Conservation huts: publicly owned, non-exclusionary, low-key, simple, and sited in appropriate locations. The motive for their creation should be utility for park users, not for private profit. I do not support commercial developments or an increase of high fee paying tourists in our remote wilderness areas unless they are being assisted by a local tour operator and staying in tents.

Some might wonder how huts could impact wilderness. And even though the design sketches give the appearance the infrastructure is low key, these aren’t just huts, their scale is astonishing. I have



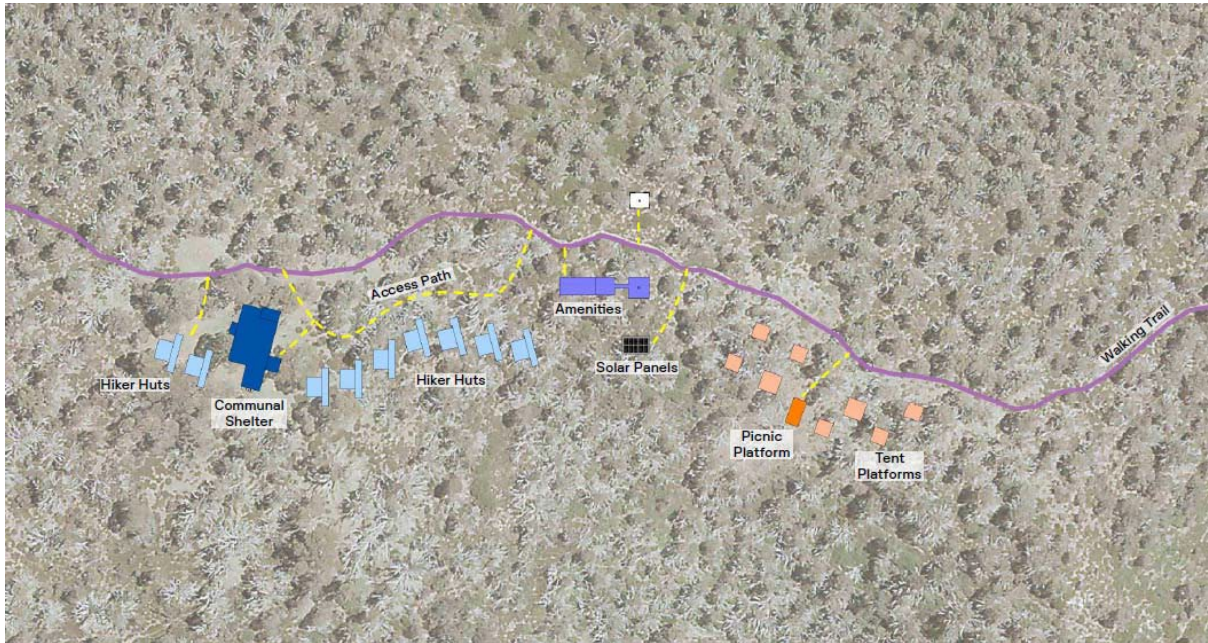
provided a few images below so that those who have never bothered visiting the site can understand.

The following image is of Diamantina Spur, traversed on day 3 of the proposed FHAC. The proposed huts and tent platforms will be built near the top in a flat, open and prominent location.

(Image credit: [Hiking Fiasco](#) - Diamantina Spur with the Razorback in the distance.)



Plan of proposed site development on High Knob (Diamantina Spur)



I welcome further discussion and trust you will give my concerns the attention they deserve.

To put all this into perspective. This development of the Three Capes Track in Tasmania. Now the scale of the Diamantina Spur development is considerably larger than this.



Now ask yourself how you feel when you have headed into the high-country to escape the stresses of life, to disconnect from the built environment, switch off from technology and find a sense of remoteness and peace only to be faced with the exact thing you are escaping from along with 100+ other daily walkers, plus helicopters servicing the huts, because Parks Victoria and tourism lobby groups decided they needed to profit from our parks.

I know I am only one person, but I know I speak for thousands. Please stop privatising our parks, you are ruining the experience for those who already rely on them and for those who will in the future.

Yours sincerely,

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