

27 January 2017

Falls to Hotham Master Plan
Parks Victoria
Level 10, 535 Bourke Street
MELBOURNE VIC 3000

Email: FHAC@parks.vic.gov.au

Dear Sir/Madam

RE: Falls to Hotham Alpine Crossing Draft Master Plan

Bushwalking Victoria thanks you for the opportunity to comment on the Draft Master Plan (DMP). These comments should be read in conjunction with our previous submission to the Preliminary Concept Plan dated 10 December 2015.

Bushwalking Victoria (BWV) represents the common interests of over 70 Victorian bushwalking clubs, with in excess of 8,000 members. BWV also aims to proactively represent the interests of all recreational walkers in Victoria as well as walkers visiting from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery and ensure their preservation for future generations. Founded in 1934, BWV has a long history of active interest in conservation, including being one of a group of like-minded organisations pressing for legislation to create a comprehensive system of national parks in Victoria as early as the 1940s.

This submission makes comments on a number of issues within the draft master plan that impact directly on recreational bushwalkers and we have also attached a list of questions arising from the DMP we feel need further discussion and clarification.

Comments in this submission have distilled from feedback from our membership, particularly those who regularly hike in the area and Field Officers who have attended a number of the drop in information sessions.

Impact on Recreational Bushwalkers

Data from page 87 of the DMP suggests that participation by recreational bushwalker will fall from 17,000 current walker nights to 8,500 walker nights. As a peak body representing the interests of recreational bushwalkers we simply cannot support any proposal that predicts a halving in the participation of the group that we advocate for.

Equal Access

Recreational walkers must continue to have equal access to all tracks, not just the Falls to Hotham Alpine Crossing. A number of comments within the DMP suggest that there will be restrictions on where recreational bushwalkers will be allowed to camp, and that commercial groups will have priority for booking limited campsites. “Tour operators have first option on bookings up to a reasonable limit”, page 100. What is a reasonable limit?

The Trail

Amongst our members the areas around Diamantina Spur and Federation Hut created the most discussion and opposition.

Diamantina Spur, the proposed hut site, is a long established camping site for recreational bushwalkers and the DMP seeks to exclude recreational bushwalkers from this site. It would be impossible to site huts on this spur and have them remain invisible to hikers not wanting to have their alpine experience compromised. The level of difficulty in reaching this area should warrant that this section of the trail be reconsidered, not moderated by the inclusion of stone stairs (page 33).

The area around Federation Hut can even now be a heavily visited area. With the addition of the predicted walker traffic it would become unmanageable. Unlike a number of tracks shared with independent walkers and commercial operators, it is quite feasible for large numbers of recreational hikers to hike to locations such as Federation Hut from a number of starting points, i.e. from Harrietville or via the Razorback.

If our overall objections to the DMP can be overcome, Bushwalking Victoria could be in a position to provide assistance to map out and field test alternative routes, in much the same way that we assisted in the development of the Grampians Peak Trail.

Infrastructure on the Trail

BWV does not have a blanket objection to the creation of infrastructure to support walking in National Parks but certain clear provisos must be met. In particular, BWV believes that any huts or other accommodation constructed must be visually unobtrusive – preferably invisible from the walking track – and must be strictly controlled and managed so as to minimise their impact on the sensitive natural environment. BWV does not support the construction of visually obtrusive infrastructure or any other inappropriate infrastructure along the route proposed in the DMP.

As mentioned above, BWV does have particular concerns about proposed facilities on Diamantina Spur and the Federation Huts area.

Overuse of the Trail

The usage modelling presented in the DMP, page 87, predicts 65,500 walker nights. Based on 275 days a year when walking would be possible (365-90, 3 months snow covered), this equates to approximately 240 walkers commencing the walk each and every day by 2026. Is this realistic? Where will 240 walkers will be accommodated each night? Clearly limits will need to be imposed on the number of hikers commencing the walk each day.

Walker limits from two internationally recognised walks are detailed below:

Overland Track, Tasmania	A maximum of 60 walkers can depart each day: 34 independent walkers; 13 group members booked to use the group tent platforms; and 13 with the commercial tour company who are accommodated in private huts.
Milford Track, New Zealand	A maximum of 90 walkers can depart each day (during May to Oct): 40 independent walkers; and 50 with the commercial tour company who are accommodated in private huts.

Confusion surrounds the statement “The number of permits issued daily is 240, and for any of the 4 overnight nodes on any given day there is a cap of 60”, page 100. What happens to the other 180 hikers? Bushwalking Victoria is seeking clarification on these numbers and what percentage will be allocated to independent walkers. Is 60 the size of the accommodation huts being proposed?

Walker night numbers contained within the DMP need further discussion and clarification including the base data and the modelling used to predict growth to 65,500 by 2026.

Operation and Maintenance Funding

A number of recently created major walks are already suffering from the lack of ongoing maintenance funding. A number of recent comments have been received about the condition of the Grand Strzelecki. The commitment to develop any new major walking track must be matched by a regular annual maintenance allocation. What are the predicted O&M costs which have been omitted from the DMP.

Impact on Volunteer Efforts

In researching our members’ responses to the DMP, the group of volunteers who regularly provide track maintenance activities have overwhelmingly indicated that they would not volunteer in areas that “for profit” organisations operate.

We trust that you will consider our comments regarding the DMP and look forward to receiving your responses to our questions and clarification requests.

Yours sincerely



Peter Campbell
President

SOME OF THE UNANSWERED QUESTIONS

Comment in the DMP	Comment/Question/Clarification
<p>Parks Victoria will require additional personnel and maintenance resources to ensure a high quality, iconic walking experience is achieved. Relationships with volunteer groups will be developed for involvement with ongoing maintenance and trail improvement initiatives.</p> <p>Page ix</p>	<p>Will the additional personnel and maintenance resources be in addition to the existing personnel and maintenance resources or a reallocation of scarce resources away from existing budgets?</p>
<p>The Walk Victoria's Icons walks include the Great Ocean Walk, Grampians Peaks Trail, Coastal Wilderness Walk and Falls to Hotham Alpine Crossing.</p> <p>Page 2</p>	<p>Are there any plans for the Coastal Wilderness Walk similar to what is being proposed for the Falls to Hotham crossing?</p>
<p>Add-on experiences such as: – Biking – Horse riding – Boating – Fishing</p> <p>Page 39</p>	<p>Where will these add-on experiences be provided?</p>
<p>Accommodation will be offset from the trail, and, where possible, will not be visible from the trail.</p> <p>Page 56</p>	<p>It should be mandatory that if roofed accommodation is allowed then it should not be visible from the trail.</p>
<p>A competitive process will be run by the Department of Environment, Land, Water and Planning for the approval of roofed accommodation. All development will comply with the National Parks Act 1975, National Parks (Wilderness) Act 1992, the Greater Alpine National Parks Management Plan 2016, local planning schemes and all other relevant statutory planning legislation.</p> <p>Page 58</p>	<p>What does this mean?</p>
<p>Designated campsites will be provided to Falls to Hotham Alpine Crossing trail walkers at all overnight nodes. Dispersed camping will be prohibited within 500m of the trail. All camping facilities will require a booking and fee, open to licensed tour operators (LTOs), independent hikers or groups</p> <p>Page 59</p>	<p>Bushwalking Victoria understands that this has recently been amended</p> <p>Any limitation on independent recreational walkers cannot be supported.</p>

Comment in the DMP	Comment/Question/Clarification
<p>Lodging will thus be designed to the highest environmental standards and operate with the smallest ecological footprint.</p> <p>Page 60</p>	<p>Will a review and audit process be in place from day 1 to ensure this occurs?</p>
<p>The Federation Hut visitor site currently provides a setting for group and individual camping which will continue to function as such. The site is popular for school groups hiking up from Harrietville, creating a need for adequate buffers between the group camping grounds and dispersed camping platforms, which will be located in an area offset from the hut.</p> <p>Page 69</p>	<p>Is there a potential for this site to be over used. What protections are planned to ensure it is not?</p>
<p>Growth in Walker Nights Table</p> <p>Current walker nights 17,000</p> <p>2026 Adventure walker nights 8,500</p> <p>2026 Total walker nights 65,500</p> <p>2026 Comfort in nature walkers 57,000</p> <p>Page 87</p>	<p>Based on 275 days a year when walking would be possible (365-90, 3 month snow covered). This equates to approximately 240 walkers commencing the walk every day by 2026. What data supports these numbers?</p> <p>Can the fragile alpine environment support this volume of foot traffic?</p> <p>What data supports a fall in adventure walker night to 8,500?</p>
<p>Based on an increase in walker nights to 60,500 pa by 2026, it is estimated there will be an uplift in on and off trail spending to \$14.3 million p.a.</p> <p>Page 92</p>	<p>Where is the supporting documentation for these numbers?</p> <p>What is consumer surplus?</p> <p>Current walker night numbers as cited on Page 87 is 17,000?</p>
<p>Maintenance and Operations Costs*</p> <p>*Excluded from cost plan. Estimates were used for purposes of economic modelling.</p> <p>Page 92</p>	<p>What are estimated O & M costs?</p>
<p>In order to maximise potential benefits, it is recommended that all three stages be initiated at the same time whereby a commitment to the long-term vision and entire trail works program is required alongside targeted funds for the targeted projects, roofed accommodation and complementary services. Page 97</p>	<p>Then how is it a staged implementation? Surely the impact of Stages 1 and 2 on the environment should be reviewed prior to allowing Stage 3 to commence.</p>

Comment in the DMP	Comment/Question/Clarification
<p>Minimise the overlap between Falls to Hotham Alpine Crossing walkers and other park users</p> <p>Page 100</p>	<p>What strategies will be in place to ensure this happens? What is the estimated proportion of Falls to Hotham walkers compared to all other park users? We do not want rules that preclude the bulk of users from enjoying their Alpine experience.</p>
<p>Tour operators have first option on bookings up to a reasonable limit</p> <p>Page 100</p>	<p>What is reasonable?</p>
<p>Independent walkers who are prepared to follow a set itinerary are allocated a share, subject to availability</p> <p>Page 100</p>	<p>When would this be known – a week out, a day out from departure?</p>
<p>The success of the Falls to Hotham Alpine Crossing is reliant on the provision of a wide range of accommodation options, as well as support services, to be provided by the private sector.</p> <p>Page 105</p>	<p>Have private sector investors been sought or come forward yet? If so who are they?</p>
<p>Friends groups, volunteers and students make a valuable contribution to park management and extend the scale and involvement of the community in particular projects. There is an important opportunity to involve community groups within the planning and implementation of the trail to ensure a strong sense of pride and community ownership.</p> <p>Page 105</p>	<p>Will Friends Groups and volunteer efforts in general decline once private sector investors become involved? As a volunteer I would not be offering my services as a volunteer for free so that the private sector can profit from it.</p>