

Falls to Hotham Master Plan
Parks Victoria
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Subject: Falls to Hotham Alpine Crossing Draft Master Plan: Feedback from Canberra Bushwalking Club (CBC)

Thank you for the opportunity to comment on the draft master plan for the development of the Falls to Hotham Alpine Crossing walk. This club has a direct interest in the proposal, as many of our members walk on the Australian Alps Walking Track (AAWT) and/or periodically organise walking events in the area.

Overall: We are concerned about the approach being taken to the proposed track development in the draft master plan. The plan reads more like an investment prospectus for a commercial development than a rigorously vetted strategy. There is no indication that the relative merits of a range of possible options for the development of the area were explored, nor the risks related to each of these options adequately considered. We are particularly concerned about the possible environmental impact of proposed infrastructure development on Diamantina Spur and the plans to heavily reduce access to the area by walkers who do not belong to higher-income groups or who have uncertain walking schedules.

Access: A number of track development options should be considered to widen both the revenue base and increase the number of park visitors, not only a single option which benefits one group of users at the expense of others. The underlying rationale for the development of the area appears to be the generation of revenue for the Victorian Government. This objective is fair enough, if related to ensuring more effective park management, and it is deemed desirable to provide opportunities for a wider range of walkers to enjoy the area. However, the plan only focuses on increasing the proportion of higher-income users (“comfort in nature market”) at the expense of lower-income users (“adventure seeker market”). It clearly states that priority will be given to commercially organised groups for booking campgrounds and that dispersed camping will not be permitted within 100 metres of the trail. This contradicts the objectives of Victoria’s *Healthy Parks, Healthy People* program to encourage people from disadvantaged areas and Indigenous communities – among other members of the community – to access nature. Although frequent visits to the area by school groups is mentioned, the plan does not state how these important educational opportunities will be maintained, as the costs of visiting nature can be expected to increase once the Master Plan is implemented. For these reasons, the draft plan appears to promote socio-economic inequality of access.

There also is a related logistical issue which is not discussed in the plan at all. Part of the proposed route for this new “iconic” walk falls along the AAWT. ‘Dispersed’ walkers on the AAWT may not be able to accurately predict the precise dates when they will pass through this location and make bookings at the campgrounds. Additionally, will they be able to access viable sites away from the campgrounds and water supplies? What consultation has taken place with the agencies from other states involved in the management of the AAWT regarding the implications for them?

It appears that other options to generate revenue and maintain access for a wider range of park users were not considered nor the relative costs and benefits of different options – or this has not been publicly documented. For example, a park pass system could be introduced, such as that used for Tasmania’s overland track, which also allows for control of numbers. This possibly could be supplemented with cross-subsidisation between more heavily used and less heavily used parks, as is the case in New South Wales. It seems ill-considered to pro-actively and intentionally plan for the decline of most users in order to pursue a group of users from an untested market.

Environmental Impact: A more thorough environmental impact assessment should be conducted prior to approval of the Plan or the results of the desk assessment released if it covers the issues identified below.

The document repeatedly states that the proposed walking track will be situated in “a unique and fragile alpine area,” and development of the walking track will respect key Commonwealth and state environmental legislation and principles. The attention paid in the plan to minimal impact route development and accommodation infrastructure is highly commendable.

At the same time, it appears to be assumed that the track must be built in the areas specified in the plan. The rationale for some of the track and accommodation locations, from an environmental perspective, appears weak and poorly documented: the proposed developments along the eastern flank of Feathertop are a case in point – the rationale appears to have more to do with enhancing the attractiveness of the walk to potential high-end clients than with ensuring an appropriate balance between environmental protection and commercial interests. Likewise, the main reason provided for restricting traffic volume on the track is that ‘comfort’ walkers feel that this detracts from their wilderness experience, without equal emphasis given to the importance of damage prevention to the unique and fragile alpine area.

No specific actions are mentioned to deal with the real risk of increased incursions of aggressive invasive weeds and other pests by visitors (as compared with their introduction through soil disturbances associated with construction works). What investment will be made in visitor education? What opportunities exist to encourage citizen science approaches to environmental monitoring of the track, eg through the development of smart phone apps, etc?

Cost-benefit and risk analysis: Sufficient consideration needs to be given to the potential costs and benefits of the project beyond revenue generation, and its risks, prior to approval of the master plan – rather than after its approval. An example can be found in relation to assessing the impact of the project on the area’s existing wilderness and scenic values. The document focuses primarily on how to minimise environmental damage to the areas identified for accommodation and/or track development; the rationale for the choices made of where to extend the track in the first place – compared to other options - are not well justified in the document.

For instance, some beautiful and fragile terrain that has been untouched by development to date (ie along eastern flank of Mt Feathertop/Diamantina Spur) will now have infrastructure built onto it that will affect the wilderness experience of those walking in the area, including regular helicopter servicing, and cause some unavoidable environmental impacts during construction. Alternatives, such as Cobungra Gap, are not considered – presumably so that the route takes the walkers near to Mt Feathertop and various panoramic views. There is a cost to the wilderness and environmental values of the park of such choices; it needs to be clear how the benefits outweigh these costs.

Cost modelling: The full business case should be made and commercial partnerships for the investment identified before approval is given for a \$22.5 million investment of public funds. The economic benefits analysis and cost modelling for the proposed development are limited and unreliable. The projections of potential future numbers of ‘comfort in nature’ or luxury tourists to the area are based on extrapolations from wider state tourism figures and some sketchy local data. As noted in the plan, tourism can be a volatile market and is commonly affected by changes in economic trends, particularly at the upper end. The projections should take this into account and provide a range of ‘least optimistic to most optimistic’ scenarios. This would allow for a more realistic estimate of the benefits, as well as a firmer foundation for prudent risk management.

Further to this, the master plan assumes that the upgrading/extension of the trail and construction of expensive roofed accommodation will attract private sector investment. Roofed accommodation alone represents 35 percent of the total ‘below the line’ cost of the project. Private sector partners are expected to operate and maintain the new lodges on a commercial (profit-sharing) basis, under the oversight of Parks

Victoria. Parks Victoria will carry the maintenance or any up-grade costs for an indefinite period until these commercial arrangements are in place.

There is a long history of such public sector-driven ventures failing when private sector entities are not formal partners in developing/costing and contributing to the investment from the outset – the real test of commercial viability of a project. Infrastructure Victoria's policy paper on *Value Capture – Options, Challenges and Opportunities for Victoria* further reflects on the lack of 'value for money' that the proposed commercial relationships may represent, in which private sector enterprises can potentially secure financial benefits with most of the cost and risk borne by taxpayers.

Equally concerning is that a thorough analysis has not been carried out of the feasibility of private sector 'buy-in' to the investment. For instance, some of the lodges will be built in a location without vehicular access; this means that routine waste removal and maintenance will need to be carried out by helicopter. Can a price for the outdoor experience be set that will be acceptable to a critical mass of 'comfort' travellers to offset such costs and produce an attractive profit? The plan further assumes that volunteers will contribute to ongoing track maintenance: if commercial tour operators are given priority access to the track/facilities, there may be less interest in contributing such free labour. Also, how will the use of volunteer labour play into issues relating to liability should an accident occur on the track.

These considerations are very important, given that Parks Victoria has a history of poor funding by government for park maintenance, and that it is planned to undertake all three phases of the investment project simultaneously. It is also unclear whether any profits made by the Victorian government from the development of the track will be earmarked to meet increased management and monitoring needs or be channelled into other areas of public expenditure.

***Need for a holistic and rigorous approach:* A systematic Strengths, Weaknesses, Opportunities and Threat (SWOT) analysis of the proposed investment would be beneficial.** Such analysis likely would have picked up a number of the issues and opportunities raised in this submission, as well as creating a climate for more holistic and creative thinking regarding how to combine revenue-raising measures with enhanced park access and management capacity. **The CBC strongly recommends that the stakeholders agencies involved in this plan broaden their approach and deepen their analysis, incorporating greater consideration of – and joint planning with - current and potential park users and private sector partners before approval of this large investment of public funds.**

Once again, our club would like to thank you for giving us the opportunity to provide our views at this early stage of planning. We would be grateful to be informed of the outcomes of the public consultative process and the progress of the draft Master Plan.

Yours sincerely

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