

Submission by the Victorian National Parks Association in response to the Grampians Peaks Trail draft Master Plan

June 16th 2014

Summary

The Victorian National Parks Association supports the concept of a multi-day walking track from the north to the south through the Grampians National Park. However we do have significant objections to some of the aspects outlined in the draft master plan. We do not support the proposed seven areas identified for privately constructed and operated hiker lodges within the park.

The principal of having connected walking tracks along the length of the Grampians (or at least some sections of the range) is not a bad idea in itself. Having well-designed, well-constructed tracks and sensitively located camp sites can benefit the environment. Such a track can also help increase public appreciation of the natural environment and encourage public participation with minimal impact behaviour.

We are seriously concerned that the park may be greatly compromised by moves to encourage the commercial development of roofed facilities along the walk. We believe the introduction of commercial developments along the walk is unnecessary, will spoil the experience for many visitors and potentially have long-term detrimental effects on the park.

The clearly stated primary objects of the National Parks Act, the protection of natural values, should drive all considerations of park management and operate as the overriding moderator in all aspects of the design of walking tracks. This track should fit a best practice design, allowing and demonstrating minimal impact walking.

At the moment, while strongly encouraging commercial investment in infrastructure for high-end tourism, the draft strategy also seeks to offer something for everyone, an unnecessarily ambitious approach that is likely to fail.

In short:

- The VNPA does not accept the need for, or the desirability of, commercial development of built facilities, presumably with leases of up to 99-years inside the national park. Indeed we strongly oppose that proposition.
- A 99-year lease (or even a much shorter one) will most likely override, and easily outlive, any well-considered recommendation in a 2014 strategy.
- The VNPA sees a north to south walk without commercial lodges in Grampians National Park as potentially good for park users and for the local community. It has the capacity to encourage greater community participation in outdoor activities, particularly for those most in need of that opportunity.
- The VNPA believes the walk should be strongly focussed on longer term societal benefits, which have the capacity to bring genuine long-term economic benefits to the Victorian community, and substantial long-term health benefits as well. The focus should not be on commercial development which will likely benefit a few select developers.

Submission

1. The potential benefits for the community

We believe the proposed trail should remain true to Parks Victoria's long-held slogan Healthy Parks, Healthy People. In this respect we note the statement in PV's 2014 strategy "Parks Victoria: Shaping our Future". Page 5 of that strategy gives us a compelling direction for future management of parks:

"A growing body of research tells us that time spent in nature improves people's health, reduces stress and promotes physical well-being. Parks Victoria developed and named this approach: Healthy Parks Healthy People. It is encouraging to see the expansion of Healthy Parks Healthy People world-wide with more people getting more active and benefiting from a daily dose of nature in parks."

Further, Deakin University's Dr Mardie Townsend, whose research looks at how experiencing natural areas can benefit people with mental health issues, says in a recent Park Watch article that:

"Canadian research has found that nature contact (usually through parks) is a significant predictor of human happiness."

She adds:

“The importance of the links between parks and physical activity cannot be overstated, especially in light of research published in 2008 by Medibank Private which estimated the cost of physical inactivity in Australia at \$13.8 billion.”

As Parks Victoria knows, there have been many studies and a vast amount of literature which show that the benefits to individuals from experiencing nature are profound and include economic, societal, psychiatric and physical health benefits.

In this context, the framing of the walk as a primarily commercial tourism exercise is short-sighted and does little to validate Parks Victoria’s claim to be the pre-eminent exponent of a Healthy Parks, Healthy People programme.

Dr Townsend’s article “Linking Parks and People” (Park Watch, June 1014) is attached in *Appendix I* at the end of this submission.

2. The benefits for tourism without ‘comfort seeker’ lodges in the park

The master plan draft seems to concentrate on the potential economic benefits from the ‘comfort seekers’, but largely ignores the greater potential offered by the backpacker and local (ie Victorian) market.

According to Tourism Victoria’s Backpacker Tourism Action Plan 2009-2013:

- Around 260,000 backpackers currently come to Victoria each year, contributing around \$500 million to the Victorian economy. Nevertheless this amount is substantially less than for NSW, which attracts some 440,000 backpackers annually.
- Even though backpackers generally stay longer than other visitors and have a higher propensity to disperse into regional Victoria than other visitors, of all backpacker visitor nights spent in Victoria in 2007, 84 per cent were spent in Melbourne and 16 per cent in regional Victoria.

It seems Victoria’s tourism industry has so far failed to attract backpackers into regional Victoria, even though it offers many highly regarded destinations.

Also, according to the Action Plan:

- *“Anecdotal evidence suggests that backpackers are more environmentally sensitive visitors, with travel patterns that are sustainable and less intrusive than other visitor segments”.*

This is important information and brings into question the need for built lodges inside the park. Lodges adjacent to the park offering a range of budget/comfort options, with tour operator access to nodes within the park, is a better solution.

3. The benefits of siting commercial developments outside the park

There are many benefits to siting commercial developments outside the park.

- First and foremost, planning for commercially developed accommodation outside the park relieves some of the pressures imposed by water supply, human and other waste, infrastructure creep and the need for vehicle/helicopter access away from the park itself. This reduces long-term management costs, and protects the 'park experience' for all users.
- Developers are free to expand any infrastructure to fit their changing commercial aspirations and/or imperatives.
- Buildings outside the park can more readily meet prescriptions in the Bushfire Management Overlay (p. 82). If buildings inside the park, even small lodges, complied with fire planning regulations, the obligatory clearing would have a major impact on the park environment.
- There is potential for a greater range of accommodation outside the park, providing all levels of comfort and walking experiences to prospective markets.
- The invaluable attraction of true wilderness in the remote and natural areas of the park would not have to be compromised by the pressures of matching infrastructure to other facilities elsewhere along the walk.
- A one, two or three day loop walk linked to the Peaks Trail could be an attractive proposition at some point. While the north to south walk might be very marketable, most walkers like a loop walk and are attracted to three days maximum, similar to the Tidal River/Refuge Bay/Waterloo Bay walks at Wilsons Prom.

4. Some potential benefits of the trail

There is potential for the track, if carefully designed and constructed, to allow increased opportunities for walkers while improving protection of the extraordinary

natural heritage areas. This would particularly be the case if planning for the walk included the closing and/or rehabilitation of existing poorly located or designed tracks.

While this proposition is briefly mentioned in the master plan draft, care should be taken to avoid closing some tracks highly valued by experienced walkers such as: The Bomjina trail which gives alternative access to Mt William; the capacity to enjoy the Major Mitchell Plateau as a weekend walk (rather than 4 nights); popular ½ day and one day walks to peaks such as Mt Rosea; and the Dairy Creek track, which visits one of the few places in the Grampians where wet sclerophyll forest can be seen.

5. Some threats posed by allowing commercial developments in the park

The recommendation that any commercial infrastructure should be demountable, allowing removal at any time in the future, presents itself as a good precaution yet it lacks credibility given the option of 99-year lease agreements. **A 99-year lease (or even a much shorter one) will most likely override, and easily outlive, any well-considered recommendation in a 2014 strategy.**

Likewise the current government policy framework for commercial developments in parks, *Guidelines for Tourism Investment Opportunities of Significance in National Parks 2013*, provides little long-term protection for the natural values of the park. The framework only offers guidelines with no legislative basis and a flawed approval process. See *Appendix II* for a detailed critique of the guidelines.

Currently there is no roofed accommodation within the Grampians National Park. The provision of 'on-walk hiker lodges' will be the thin end of the wedge in terms of having built development through the national park. While such 'on-walk hiker lodges' may initially be small (15 customers + guides and other staff) there will inevitably be pressure to increase their size once the walks are established. Only three 'on-walk hiker lodges' are envisaged but it is inevitable that once these are established there will be pressure to build additional lodges corresponding to the camp sites along the track.

The 'on-walk hiker lodges' also present some environmental issues new to the park. In particular there will be increased sewage, waste treatment and disposal from the provision of showers and kitchen facilities over and beyond what would be expected from a camping site with a similar number of people.

When setting out the principals for locating accommodation, no mention is made of the need for water and waste disposal. People staying in lodges will generate more waste (packaging, unused food, etc) than campers and this must be removed. The

presence of showers will greatly increase water demand and it is unspecified as to where it will come from, a creek, rainwater? Either way the footprint of the lodge will be increased by the need for piping and or tanks as well as water treatment before the water can be released back into the environment.

In addition:

- The justifications offered for allowing private sector commercial development in the park are weak. The rationale (p. 63) is that “hiker lodges located along a remote, multi-day walk, are reliant on visitors directly engaging with the park in a way that makes travelling to and from the park impossible or inconvenient. In such circumstances, private sector investment ... should be allowed” There is no apparent logic in this statement.
- Nothing described in the plan actually requires private sector development within the park, and there is a question of how much future private development will occur. For example, the plan states that Grampians tourism will assist in development of “future tourism adventures”; LTOs will develop suitable walking products “that will expand the quantity and diversity of people” walking the trail; private sector investors will provide a wide range of on-park ... accommodation options, as well as support services”. This will include “future management of trail, transportation, support infrastructure, and tourism packages” (P. 89). It is unclear what all of this is, or why this requires management from the private sector. Another danger here is that calls for an expansion of water sports, mountain biking, and/or horse riding at Halls Gap could lead to environmental degradation if accommodated within the boundaries of the park, and significant annoyance to the c. ¾ million overnight visitors the park currently attracts.

6. The draft is sometimes unclear about what is planned and lacks evidence needed to justify recommendations

- Sometimes the draft states that the proposed hiker lodges are to be used by commercial groups only; sometimes it states they are to be used by both ‘independent walkers’ and LTO groups.
- The plan produces a “carrying capacity” figure of 130,305 visitor nights per year. However there is no evidence of the rationale for this figure and we are not aware of any studies or data to suggest that this is environmentally, physically or socially sustainable.

- The draft claims that the walk “will be one of the great long distance hikes of the world” (section 2.2). In reality the walk cannot remotely compare to the many long distance walks in Europe (eg north to south across Norway), North America, or the Himalayas/Karakoram region. It might be more useful to have realistic expectations here.
- The proposed booking system says nothing about what percentage of campsites/lodges can be booked by commercial groups, what percentage by independent walkers or what percentage by advance booking only – issues which are generally addressed by such booking systems overseas.
- It is proposed to allow walking only from N to S along the trail. No mention is made of whether this is just for the entire trail or for any particular segment. The rationale for the N to S walking is that this direction is “...widely regarded as a better walking experience”, just how widely regarded this is, is unclear. Many segments are better walked from S to N and some people prefer to encounter the more spectacular scenery (in the N) later in a trip. The Grampians Trail cannot be compared to other long distance walking trails at Cradle Mountain or Milford Sound because, unlike these, there are many entrance points in the Grampians. Further, there is no indication given as to how it would be feasible to stop people walking in either direction.
- The proposed fee per tent pad rather than fee per person could encourage greater numbers to camp on one tent pad by way of reducing costs. This may increase “illegal” dispersed camping and greater environmental degradation.

7. Some additional points

Page 46 – Booking system: While it is specified that LTO’s cannot hold permanent bookings, there is a real danger that at peak times LTO’s will book all available places at some camp sites thus excluding members of the public from doing the walk on their own. This will effectively lock people out of the park and destroy the principals that our national parks currently adhere to. LTO’s must not be allowed to book more than 50 per cent of places at any camp site. There is also the risk that charges for the camp sites will be prohibitively high (anything over \$20 in today’s value) and so out of reach for many walkers.

Page 46 – Management of camps: The document acknowledges that there will be an infrastructure creep: ‘PV may also consider proposals for additional hiker camp infrastructure from LTOs should there be interest’. It appears to be unrealistic to expect that a camp will be reduced in capacity or moved if there is visible environmental damage.

Attachments:

Appendix i

June 2014 Park Watch article: *Linking Parks and People*

Appendix ii

VNPA issues paper: *Private Developments in Parks – a critique*

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