



Ascending Mt Hotham. IAN HILL

SUBMISSION TO

Falls to Hotham Alpine Crossing

Submission to application 2025/10319

6 November 2025

Victorian National Parks Association

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Victorian National Parks Association (VNPA) is Victoria's leading nature conservation organisation. We are an independent, non-profit, membership-based group, which exists to support better protection and management of Victoria's biodiversity and natural heritage. We aim to achieve our vision by facilitating strategic campaigns and education programs, developing policies, undertaking hands-on conservation work, and by running bushwalking and outdoor activity programs which promote the care and enjoyment of Victoria's natural environment.

VNPA has been a part of the Falls to Hotham Stakeholder Steering Advisory Committee.

Summary

The controversial Falls to Hotham development has been plagued by issues of public distrust, poor community consultation practices, exclusionary to park visitors and remains deeply unpopular.

In its current form the Falls to Hotham development will cause a significant impact on Matters of National Environmental Significance (MNES) including the iconic snowy peaks listed under as a National Heritage listed landscape.

Numerous wildlife species such as Alpine Water Skink (*Eulamprus kosciuskoi*) and Alpine Bog Skink (*Pseudemoia cryodroma*) which are listed as MNES will also have their habitat damaged and destroyed in a protected area where their welfare and persistence must be paramount.

Ecosystem restoration in the Alps takes decades to centuries due to harsh and rugged nature of the place. The loss of over 4 hectares of protected vegetation and habitat is unacceptable and full restoration is likely impossible.

The Australian Alps national parks and reserves are a National Heritage place under the EPBC Act S15B for its natural and cultural values and as such is a MNES.

Below we will outline the need for the **Falls to Hotham Development must be a Controlled Action.**

New High Knob Visitor node

The FHAC proposed development impacts on several national heritage criteria, but we have particular concerns in regard to the impact of the proposed High Knob (Mt Feathertop) visitor node.

Mt Feathertop is a highly visited area with thousands of day and overnight hikers and runners using the area. The High Knob proposed visitor site is close to Mt Feathertop. The site is currently a green field site with little disturbance. The new facilities will include eight solid camping platforms, a shelter hut, a significant toilet facility and a network of paths to service the FHAC.

This section utilises the very steep, rough, and infrequently walked Diamantina Spur to access the Mt Feathertop area. This section is not part of the existing FHAC and has been added on in the new master plan. Adding a new visitor site to attract more visitors in an area of outstanding natural landscape values, in and amongst what is already an overcrowded visitor experience, is a poorly thought-out plan for an area of very high national heritage values. This warrants further examination of its impacts on national heritage values.

This overnight camping facility is not being put in place to mitigate impacts of or service current visitation, it's about attracting a whole new cohort of visitors utilising the FHAC.

The national heritage values particularly at risk are:

Criterion E – Aesthetic Values

The construction of new infrastructure including camping platforms, amenities block, shelter hut, and gravel paths and increasing visitation to an already highly visited area in an area of outstanding aesthetic values (Mt Feathertop) is clearly an unacceptable impact on national heritage values in this area.

There is no vehicle access so management presence will be minimal to deal with impacts, and this site will inevitably risk becoming a new camping and day visitor stop for thousands of hikers not utilising the FHAC experience. Helicopters will be required to remove toilet waste and deliver water. This will collectively have significant impact on Criterion E – Aesthetic Values.

The rationale for being an essential part of the new and unique FHAC experience to justify this impact is highly questionable. If the intention was to mitigate current impacts, the approach would be totally different.

Criterion G – Social Values

The introduction of new infrastructure, increasing visitation even more and increased helicopter presence will significantly impact on the current social aspects of the Mt Feathertop hiking experience. It would be expected that the interplay between day and overnight visitors using the site that FHAC users have paid for will be a more prominent issue for this area given no management presence leading to poor visitor experience.

This High Knob camping area proposal is a reckless approach to planning and managing a treasured and extremely sensitive place of our national heritage impacting significantly on aesthetic and social values.

There are alternatives for avoidance and minimisation of impacts on this section. Parks Victoria has not considered obvious alternatives to still have a FHAC experience but minimise the impact national heritage values. The clear alternative in to utilise the existing FHAC in this area using the existing West Kiewa-Swindlers Spur route to finish at the new high investment visitor welcoming centre at Mt Loch carpark in the Hotham Alpine Resort.

Impact on listed species and ecosystems recognised as MNES

Listed Threatened Species and Ecological Communities are another MNES. The FHAC Environmental assessment lists many threatened species and communities impacted by this proposal. While the referral lists mitigating actions, the introduction of 24 solid timber large camping platforms at three sites will completely obliterate sensitive alpine vegetation below the platforms creating bare ground.

Parks Victoria's own documents *Preliminary Environmental Assessment document (ABZECO 2024)* (Accessed through FOI request FOI 2023-24-34) recommended the development be EPBC referral due to the significant impacts on a number of Matters of National Environmental Significance including:

- The Australian Alps National Parks and Reserves, National Heritage Place matter
- Listed threatened species and communities; and
- Periglacial values included on the EPBC National Heritage List.

Although the size of the project has been reduced the impact on listed MNES remains high.

As highlighted within the *Falls to Hotham Alpine Crossing Environmental Assessment Report (October 2025)* (Att-10) the impact on species including Alpine She-oak Skink, Shining Cudweed and Guthega Skink still remain despite the development being scaled back in parts.

Concerns around the quality and usefulness of survey efforts that inform this process also raise great concerns.

As the report states “*Targeted fauna surveys were undertaken for a limited number of species. Targeted surveys for some cryptic and/or seasonally active species (e.g., Alpine She-oak Skink) have not been undertaken as habitat is widespread across the project area, and extensive surveys efforts across multiple survey seasons would have been required to determine presence or absence, and lack of detection may not necessarily indicate the absence*” and in relation to threatened flora states that “*he distribution and habitat requirements for many flora species is poorly known, due to a limited number of records and past survey effort*” as well as concerns about surveying for plants due to “seasonality and limited growth period of some flora species may have affected their probability of detection”.

These large holes in surveying efforts for threatened species is both unacceptable on animal welfare grounds but also unacceptable due to the context of the area being with an area recognised under Federal law as a National Heritage Place and an internationally recognised protected area.

This is a totally unnecessary design feature. Furthermore, the proposed greenfield site at High Knob contains the potential habitat of four listed threatened species.

There are alternatives for avoidance and minimisation of impact on sensitive alpine vegetation at campsites. This impact can be easily eliminated by using open mesh platform material already used at the existing FHAC sites. This design allows vegetation to continue to grow under the platforms providing a more natural experience and modification can be made for comfort. The use of solid timber in an alpine environment is outdated and unnecessary, again a reckless approach to managing these precious areas

FHAC proposal must be a controlled action

While VNPA is not opposed to upgrading the existing FHAC in principle, but for the above reasons alone, the VNPA believes the new master plan for the FHAC has poorly addressed MNES, failed to consider alternatives and is indeed likely to have a significant impact on a Matters of National Environmental Significance. We therefore urge the DCCEE to move this referral to a controlled action and we would be happy to engage and discuss alternatives.

Further information

Should you need further information please contact Jordan Crook, Parks and Nature Campaigner at Victorian National Parks Association on 0401635573 or jordan@vnpa.org.au