

Greater Alpine National Parks – Draft Management Plan, June 2014: A Response from the Heritage Council of Victoria (Heritage Council)

General Comments

The Draft Management Plan (Plan) is narrower in its focus than many previous plans prepared by Parks Victoria. It aims to manage / protect known environmental values through prioritising zones so as to direct scarce resources to tackle key threats. In doing so, the Plan tends to overlook the importance of historic heritage assets and fails to make adequate provision for their assessment / management. The Heritage Council has made a number of more specific comments about the Plan. These are detailed below.

1. Executive Summary

Page iii: States that the aim of the Plan is to conserve and maintain the cultural heritage of the parks by:

- Undertaking conservation and interpretive works at key heritage places, and
- Fostering the community's ongoing cultural and heritage connections

The two dot points give the impression that the cultural resources are known and that there is no need for contingency planning around the discovery of new places and archaeological sites. The Plan should acknowledge the potential for the discovery of new heritage places and archaeological sites.

Page v: Meeting legal management arrangements

The Plan mentions the *National Parks Act 1975* and the need to protect features of archaeological and historic significance, but there is no mention of the *Heritage Act 1995*. Given that the Heritage Act is the Victorian Government's principal Act for the protection and conservation of places and objects of cultural heritage significance, this is a significant omission.

Page ix: Living cultural heritage

The Plan states that... "the cultural significance of historic areas and places will be conserved, interpreted and *where appropriate compatible uses encouraged*" [emphasis added]. This additional management aim is significant and should be highlighted in the Summary on Page iii.

Page ix: Sharing management

There is reference to 'Mountain Cattlemen, Traditional Owners, recreationalists and many others' ... Given the importance of respecting the rights of Native Title holders and the role and knowledge of Traditional Owners and groups (highlighted in the Summary, Page iv), the Traditional Owners should be listed first.

Page x: Recreation and tourism

There should be a management aim mentioned to the effect that the activities approved will not increase harm to the cultural heritage values of the site.

2. Introduction

Page 8: The Plan discusses the fact that the Australian Alps National Parks and Reserves were included on the National Heritage List (NHL) and notes their protection by the *Environment Protection and Biodiversity Conservation Act 1999*. It would be appropriate to include brief reference to the reasons that the Australian Alps were included on the NHL.

A new section should also be introduced that discusses State listings and mentions the role of the *Heritage Act* in protecting places which are of cultural heritage significance.

3. Vision

Page 13: There is reference to ensuring that "*Historic and Cultural Heritage is respected and conserved*" ... this gives the impression that the historic and cultural heritage has been identified. In

fact, new places continue to be discovered and the values associated with existing places change. The Plan should specifically acknowledge this.

4. Zoning

Page 17: The Plan indicates that fossicking is not allowed in the planning area zones for national parks; but is allowed in planning zones for Reserves. A recent VEAC investigation into fossicking in National Parks highlighted the detrimental impact from fossicking on archaeological sites. Reference should be made to this document.

Page 19: The Plan should include mention of Local Heritage Overlays related to historic places and archaeological sites on the Victorian Heritage Register.

5. Fire management

Page 44: Fire Operation Plans (FOPs) are addressed but there is no discussion of their potential impact on historic heritage. The Plan should contain an acknowledgment that the extent and coverage of the historic cultural resource is not comprehensive, and that existing sites have not been adequately recorded and assessed for vulnerability to fire. Potential impacts include loss of timber elements, threat of falling trees on fragile structures, uncovering sites and thus exposing them to pilfering of relics, and exposing stable battery sands to erosion.

6 Living Culture

Page 51 – (words in bold should be included). The first sentence should make reference to water and timber harvesting (to ensure consistency with the Executive Summary)

Page 51- The historic snapshot provided is not adequate. The parks have a complex history but one theme stands out - gold mining. A 2002 report on the mining heritage of the Australian Alps stated that mining exerted a powerful influence: *“Mining was the activity that originally brought significant numbers of Europeans into the Alpine and sub-alpine environments. The numbers involved were not approached again until the Snowy Mountains Scheme was undertaken in NSW (1950s-60s), and the modern commercial ski industry was developed in NSW and Victoria (1960s-present). Mining brought government into the Alps for the first time to administer the early goldfields, and provided infrastructure such as roads, schools, courthouse, post offices, police barracks etc. Mining also stimulated the development of support industries, including logging and saw milling, the intensification of grazing, and the development of intensive agriculture in peripheral areas”* Page 31, Australian Alps Mining Heritage Conservation and Presentation Strategy, by LRGM-Services, for Australia Alps Liaison Committee (2002)

Page 51 - The Plan includes a Statement about the number of places recorded on the Office of Aboriginal Affairs site registry. A similar Statement should be included about the number of places included on the Heritage Inventory and the Victorian Heritage Register. This information can be obtained from Heritage Victoria.

Page 51 - (words in bold should be included) ... Historic places and archaeological sites are managed to conserve their cultural values **in accordance with the provisions of the Heritage Act 1995**, individual heritage action plans, action statements, and the Burra Charter.

7. Strategies

Page 52-53... The Plan rightly identifies that the Parks possess outstanding natural values. Nevertheless historic human activities have modified the landscape through grazing, gold mining infrastructure and settlements. Many of the impacts are quite localised, e.g., gold mining despite being a powerful driver of settlement only directly affects a small proportion of the land area. Other consequences of settlement – e.g., weeds and feral animals - are more pronounced and widespread.

The cultural heritage values are mainly just named, and unlike the natural values identified, there is no meaningful analysis of extent, type and significance. There are a number of omissions:

- There is no overview of the numbers or range of historic assets and their significance (e.g. State significant sites on VHR and archaeological sites on the Heritage Inventory) [on Page 63, 62 only historic buildings are mentioned]
- The only attempt at prioritising zones for historic heritage are some very broad statements *“fossicking not allowed in the planning area zones for national parks; but allowed in planning zones for Reserves; and more flexibility for tourism/recreational activities in Reserves than for Parks”*
- There is no clear identification and discussion on the major threats to the historic heritage resource such as:
 - natural erosion and decay
 - poor planning control due to inadequate knowledge of the cultural heritage resource.
 - wild fire suppression and departmental planned burns
 - construction of new vehicle tracks which exposes hitherto inaccessible site to 4wd visitation and pilfering of relics, and
 - the impact of fossicking on the archaeological record in Reserves and weed eradication activities

8. Strategies

Page 53. One of the Plans' Strategies is identified as being: *“the cultural significance of historic areas and places is conserved and compatible use permitted.”* There should be another Strategy that commits Parks Victoria to developing a contingency control measure for the discovery and reporting of new heritage places and archaeological sites ... this Strategy would link to the previous Goal (*Heritage and connections are recognised etc*) and especially to that Goal's last Strategy.

9 Research, monitoring and evaluation

Page 79: One of the Strategies in the Plan is to *“Promote ecological research that addresses key information gaps and increases understanding of priority ecological assets and threats”*. The Strategy should be expanded so that it also refers to researching and identifying information gaps and improving understanding in relation to historic heritage.

10. Bibliography

The *Australian Alps Mining Heritage Conservation and Presentation Strategy*, by LRGM-Services, for Australia Alps Liaison Committee (2002) is very relevant to the Plan and reference to it should be included in the bibliography.

