

Draft Tourism Master Plan

for the Tasmanian Wilderness World Heritage Area

Submission from:

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Special Note:

Like all Tasmanians we are aware of the extraordinary circumstances surrounding the COVID-19 outbreak, and the fact that this has temporarily reduced tourism into Tasmania from outside the state to zero. As there is an expectation in the industry that tourism levels will at some stage return to pre-COVID levels, we have framed all of our comments in reference to the immediately pre-COVID situation rather than the abnormal circumstances existing at the time of our submission.

The following comments are organised as dot points under headings of the relevant sections in the Draft Plan, and we've added a Summary of our own position at the end.

1 Introduction

1.1 About the Tasmanian Wilderness World Heritage Area (page 2)

- Paragraph 2: Some clarification is needed:
 - 'climatic circle' – should be climatic cycle
 - 'lifeways' – according to Wikipedia, lifeway is a term used in the disciplines of anthropology, sociology and archaeology, particularly in North America. It is not a term which would be familiar to the majority of visitors to the TWWHA. Perhaps a better choice of word is needed here to ensure clarity of meaning?
- Paragraphs 4, 5: Refers to low levels of disturbance that will increase the survival potential of much of the environment. This will only be possible if strict controls are put on any future tourism ventures, restricting them to the perimeter of the TWWHA and thereby reducing human impact. Similar strict controls would need to be applied to helicopter flights set up to access private operations.
- Paragraph 6: 'healthcare savings' needs elaborating. Also, clean air and water are ecosystem *qualities*, not services – the TWWHA does not exist to provide services to mankind, and terminology must not be allowed to project it that way.
- Paragraph 8: The statement that there remains potential for further sustainable tourism in the TWWHA is open to question. The glossary clearly states that while the level and growth rate of sustainable tourism takes into account social, economic and

environmental factors, in the context of the TWWHA it must be *without* adverse impacts on the Outstanding Universal Value and other significant natural and cultural values. Our own on-site observations indicate that this requirement has already been substantially overstepped by the impact of excessive tourist numbers at Cradle Mountain, yet there are multi-layered plans for even further increased tourism there. Re. EOI: The State Government's Expressions of Interest process has been secretive and inspires neither trust nor confidence. There should have been a far greater level of transparency right from the outset. The validity of 'Commercial in Confidence' is highly questionable in the context of plans to lease public land in parts of the TWWHA or any other Tasmanian reserves to private operators for commercial operations, and there is widespread suspicion that this was simply used as a tool to keep the public in the dark as to what is planned. The odium surrounding EOI could have been so easily avoided by treating the Tasmanian public as in-the-loop, primary stakeholders right from the start.

- The final paragraph of section 1.1 is poorly expressed, but we agree with the sentiment – and doesn't it just reinforce the final point we made above?

1.2 Why a master plan? (page 3 – 4)

- The mission report quote raises the question as to what constitutes a 'legitimate' tourism development. In the TWWHA context this term is extremely subjective (the recent public reaction to construction commencement at Dove Lake proves that one person's 'appropriate and sensible development' may be another person's 'abomination'). The meaning of 'legitimate' in the quote included here needs to be clarified.
- The 'negotiation' of competing interests is not a concept that should be considered in relation to the TWWHA. The protection of the TWWHA should be non-negotiable (remembering again that tourism development must be *without* adverse impacts on the Outstanding Universal Value and other significant natural and cultural values of the TWWHA).
- Providing a 'diversity of visitor experiences' should be secondary to the stated aim of conserving natural and cultural environments – not the other way around.
- In the context of the TWWHA the T21 proposal by the Tasmanian tourism industry is at odds with the whole ethos of wilderness. Pushing for increasing tourist visitation reduces the value of the wilderness and can lead to irreversible damage to the environment. The priority should be preservation not exploitation, i.e. putting the health of the TWWHA ahead of the desire for greater visitation.
- After acknowledging the importance of the TWWHA to local Tasmanians, the document then lumps all locals (other than the aboriginal community) in with the ever-expanding tourist numbers as 'visitors', thereby downplaying the very deep, long-standing traditional connection (often multi-generational) that many non-indigenous locals have with the area. In this regard, thousands of Tasmanians are about as different from the average tourist in their relationship with the TWWHA as chalk is from cheese. It is the locals who have this connection who notice the steady degradation caused by excessive visitor numbers, and understand fully how

irreplaceable the wilderness values are. Many of the current EOI proposals will also impact these values, particularly those involving built structures or helicopter access.

1.3 Scope of the Tourism Master Plan (page 5)

- There is considerable emphasis on the development of public infrastructure to support visitation. This is in potential and likely conflict with the concept of protection of wilderness values.
- PWS appears to be treated as the Tasmanian Tourism industry's dogsbody. There is no mention of what *should* be the core function of PWS, the preservation and protection of the environment and wilderness values.
- It is stated that the Plan should be consistent with the zoning of the TWWHA, but we have already seen that the zoning can be changed at the whim of the government of the day.

1.6 The Management Plan (page 8)

- Whilst acknowledging that the Tourism Master Plan is subordinate to the Management Plan, it must also be acknowledged that the Government has the power to alter zoning in the TWWHA – and has used that power, e.g. in the case of Lake Malbena, thus establishing a precedent.
- Paragraph 2: There is major concern with the wording that describes allowable uses that are 'potentially consistent with the protection of the OUV'. This raises questions over the suitability of potential future tourism ventures and the risk of damaging the OUV. Surely all allowable future uses of the TWWHA should be required to be *fully* consistent with protection of the OUV.

2 Strategic framework

2.1 The Vision (page 10)

- The ideals presented are admirable, but only achievable if there is no significant expansion of man-made infrastructure in wilderness areas. This is in contrast with the implied message of tourism infrastructure emphasised in the Master Plan.

2.2.1 Protecting and maintaining the OUV (page 11)

- A 'paradox' does not exist between accessibility and wilderness – increasing access reduces wilderness values. We have experienced hearing from an increasing number of walkers, both locals and visitors from outside Tasmania, who are lamenting the impact of rising visitation in recent times as it is detracting from the wilderness experience.
- Delivering experiences that do not disenfranchise local communities or detrimentally affect wilderness values is ideal, but the opposite has already been occurring due to the push for limitless growth in tourist numbers, and the 'behind closed doors' nature of the EOI process. Consultation with locals may occur, but their opinions tend to be ignored, as evidenced by the disregarding of substantial community opposition to the Halls Island proposal.

2.2.2 Conscious, meaningful and authentic experiences (page 12)

- The irreplaceable and enduring values of the TWWHA have been put at risk by some of the EOI applications - and these are only the ones that the public has been permitted to read so far.
- It is right that Tasmanian Aboriginals are intended to be key participants in the presentation and interpretation of values, but many non-indigenous Tasmanians also have a strong and long-standing personal connection with the TWWHA and also have a right to the opportunity to directly participate.
- The idea of visitor education is good, but in popular areas the powerful desire to get a unique selfie overrides that education, and damage around scenic viewpoints has increased dramatically over the past decade. Once the damage is done in a sensitive area it may never recover, and a part of the wilderness values is lost.
- It must be remembered that wilderness is no longer wild if there is a plethora of infrastructure - the Overland Track is a case in point, in that even without the planned additional private huts being built there is effectively a hut at least every 5km along the track.

2.2.3 Supporting Regional Communities (page 12)

- Towns on the edges of the TWWHA are in the ideal situation to support tourism within the TWWHA, and should be provided with the required infrastructure. Undesirable consequences of increased visitation are not limited to those communities; those consequences are also an issue within the TWWHA, with ever-increasing numbers of visitors, more and more infrastructure being built to cater for them, and negative impacts on the quality of experience for local Tasmanians. It would be better for the towns and their community to be given the support they need in order to ensure their quality of life, than to compromise the OUV of the wilderness. It also raises the question of visitor numbers (most of whom are tourists) being too high to be environmentally sustainable, something which is already becoming apparent in many of our National Parks, not only within the TWWHA.

2.2.4 Valuing the Role of Tourism (page 13)

- The idea that the TWWHA can benefit from increased tourism development is questionable, as it is dominantly promotion by the tourism industry that is forcing visitation levels to climb rapidly, and the experience to be impacted. Limiting development is more likely to be of greater long-term benefit for both the environment and the experiences of those visiting (both locals and tourists).
- Increasing the contribution of the TWWHA to the visitor economy equates to reducing the TWWHA to a cash cow for the state – and an increasing contribution implies endless growth which is not sustainable, no matter how carefully managed.
- Marketing and promotion of sites and experiences may lead to uncontrolled increases in visitation. It is not possible to accurately foresee how numbers might rise, and it could result in the degradation of both the environment and visitor experiences.

2.3.2 Visitor Services Zone (page 14)

- There is no problem with the sentiments expressed in the context of first-time visitors/tourists from interstate or overseas. However, overdue recognition is needed that experienced Tasmanian visitors entering the TWWHA through the

gateways rarely have any use for visitor centre facilities – instead, whether on a single day or multi-day accommodation-supported visit, their need is to get to the trailheads as fast as possible each morning to maximise the time available for longer walks or other time-critical recreational activities. The difficulty in achieving this at Cradle Mountain is becoming an increasingly frustrating issue for these users, particularly in winter when the road may be closed until the buses can run. This prevents early prior access by AWD/4WD private vehicles even when in the hands of experienced local drivers, while the buses, being 2WD, may start too late because they cannot necessarily immediately use the road as soon as it is snow-ploughed. The aforesaid scenario happened at Cradle in winter 2019.

A further, related problem at Cradle Mountain is the difficulty in getting early information (prior to shuttle bus start) each morning about whether the road is open to private vehicles and what constraints may exist. For comparison, we give the example of Mt Field National Park where up-to-date information on whether the Lake Dobson road is open, the state of it, and what private vehicle restrictions are in place, is available via a recorded phone message early each morning even in winter. Surely a similar information system could be established at Cradle Mountain?

2.3.3 Recreation Zone (page 15)

- Again, no problem with the sentiments, but the language is somewhat cliched and florid, causing the report to sound more like a creative writing competition than a thoughtfully studied document.

2.3.4 Self-Reliant Recreation Zone (page 15)

- There are repeated references to the peacefulness of the wilderness, but both the Tasmanian Government and the tourism industry appear keen to increase the number of helicopter flights over and into the TWWHA catering for a limited number of visitors, which will have a negative impact on the peacefulness for the majority.

3 Potential opportunities

3.1 Value Proposition (page 18)

- It is pointed out that wild places throughout the world are diminishing, and in Tasmania's case it is essential that the tourism industry must be very careful that the integrity and authenticity of the TWWHA isn't ruined by limitless and expanding development, even from the perimeters where people push inwards. Protecting these qualities from permanent damage will not be ensured simply by endless repetition of claims from industry leaders and the state government that there will be no risk from tourism expansion – particularly as clear evidence to the contrary is already visible in our most popular national parks. It is essential that the many well-documented lessons from other parts of the world are learnt and Tasmania doesn't just blindly follow the same path (or indeed try to outdo the world in mistake-making).

3.2 Node Hierarchy (page 18)

- Nodes should always be on the edge of the TWWHA. Once located within the TWWHA, nodes diminish the natural heritage values of the area. As confirmed by recent published research, the impacts of a node are not restricted to the footprint of that node, and a considerable area encircling the node can experience negative impacts from the pressure of extra people.

3.3 Planning Projects (page 19)

- Including the 'consideration of specific private sector opportunities' is of great concern as this is public land, and wherever private sector investment is involved it carries a known risk of local Tasmanians being locked out of areas within the TWWHA (or at least having their traditional access impacted), even if they are holders of long-period Parks Passes.
- Within reason, we support the development of infrastructure on the edge of the TWWHA, but we are concerned that, if over-emphasised, the extra people enticed by these developments will then move into the TWWHA and increase the impact to an uncontrollable and damaging level. A serious and current problem is that development of new accommodation infrastructure (or substantial expansion of existing accommodation) on the edge of the TWWHA, usually only has to go through a routine building development approval by the relevant local council, with no analysis of the impact on the adjacent TWWHA of the consequent increase in visitor numbers. A case in point is recent approval of substantial expansions in tourist accommodation in the Cradle Mountain gateway area, adjacent to a popular area of the TWWHA which has already exceeded the visitation levels beyond which damage to the natural environment and visitor experience has occurred.
- Visitor node plans in the areas mentioned have very little support from the bushwalking fraternity (representing thousands of Tasmanian and interstate devotees of the authentic wilderness experience), particularly in view of the open-ended nature of the plans. Improved campsites would be a positive move here, but the construction of more huts, particularly private huts, is a controversial scenario for the TWWHA.

3.4 Planning priorities for the node hierarchy (table, pages 20 – 22)

Primary Activity Nodes

Role:

- The problem of control and management of rapidly swelling visitation numbers has resulted in the establishment of primary nodes just outside the TWWHA (the most notable being the Cradle Mountain gateway). However, once transported to the nearest trailhead, we've personally observed at Cradle Mountain that even first-visit tourists are now getting turned off by the crowding on the low-altitude, well-formed tracks designed with them in mind, and are increasingly venturing further afield. Due partly to a common lack of Minimum Impact Bushwalking training in this class of visitor, this often happens without respect or care for the environment, and degradation of tracks and popular viewpoints is becoming increasingly obvious. Also, the penetration of inexperienced tourists into rougher, steeper, more exposed and more dangerous terrain is becoming a significant safety issue. We stress that all of this is already happening at Cradle Mountain, and is equally likely to happen in the TWWHA adjacent to any other comparable new primary node established elsewhere around the boundaries.
- Regarding cafes, retail and accommodation – we strongly disagree with the suggestion that only 'some will be located on adjoining land'. Any new developments in this category should be located outside the TWWHA, as such facilities are incompatible with TWWHA values.

Cradle Mountain:

- Despite acknowledging that increasing visitation has resulted in more walkers venturing further afield on unsuitable tracks, the tourism industry plans to increase these numbers even further. The focus should be on limiting further expansion of current visitation levels which, together with higher levels of maintenance and rehabilitation, has a chance of maintaining the quality of experience. Greater and uncontrolled expansion of numbers will counterbalance benefits from increased infrastructure expenditure in the TWWHA, and could just lead to a greater-sized problem.

Lake St Clair:

- The lower visitation levels here could alternatively be seen as a positive, as it allows visitors to experience the area's peaceful nature, and at present it provides a very welcome contrast to the saturation in visitor levels at Cradle Mountain (and it is not only experienced bushwalkers and wilderness devotees who would see it that way). Using the anthropocentric term 'underutilised' for this node has the unfortunate effect of depicting the TWWHA as an expendable resource, and is demeaning to its values.

Mount Field:

- Visitation levels are currently unsustainable in the context of protection of the Park's natural environment, and further promotion of this delicate area will exacerbate the issues. Keeping the majority of visitors within the gateway area on the hardened tracks and sheltered lower altitude walks will be essential.
- Providing enhanced access to Tarn Shelf is likely to encourage ill-equipped walkers to endanger their lives in a potentially harsh alpine environment. Alpine areas are very sensitive to human impact and are easily degraded to the point where damage is irreversible. First-time visitors in the tourist category are typically not educated in Minimum Impact Bushwalking principles, are inclined to depart formed tracks in the search for a good Selfie, and if encouraged onto Tarn Shelf in large numbers are highly likely to damage the very fragile environment.
- 'Managed transport options', if considered, must not be allowed to impact on experienced local traditional users of the park. Local bushwalkers must not be disadvantaged by having their access and activities restricted in a similar way to what has happened at Cradle Mountain.

Secondary Activity Nodes (table, pages 23 – 25)

Role:

- It is true that visitors expect nature, not infrastructure in the TWWHA, but the tourism industry seems intent on increasing infrastructure, and both locals and other visitors are likely to be dismayed by structures such as that being constructed at Dove Lake which will impinge massively on the approaching views. The adverse public reaction to the announcement of Dove Lake construction commencement on the PWS Facebook page is a lesson in point. The standard set by that structure should be used as a warning to the industry of what *not* to do.

Melaleuca:

- We are generally satisfied with this part of the plan, but with reservations about the effectiveness of methods of controlling visitor numbers to a low level. How will these controls be calculated and implemented? We make the point that Melaleuca is not alone in being rich in fragile cultural and natural values – the same can confidently

be said for the Cradle Mountain day walks area, where in contrast to the idea for Melaleuca, all current planning seems to be aimed at further promoting and increasing visitor numbers.

Gateway Towns (table, pages 26 – 27)

Strahan:

- By concentrating solely on Strahan as the gateway, there may be many businesses in Queenstown that would be unhappy with the lack of support. Queenstown is showing itself to be pro-active in the tourism industry, and there may be justification in having some form of joint gateway.

Cradle Valley:

- Keeping infrastructure in this precinct is a positive (ignoring the unsympathetic high visual impact structure at Dove Lake), although the endless expansion of accommodation, etc. is having a great and increasing impact on experiences and the natural environment within the adjacent TWWHA due to the related increase in visitor numbers. At what point will the line be drawn as to how much accommodation is provided? The current planning system appears to have a complete disjunct between approvals for further new accommodation and any consideration of the impact on the nearby TWWHA of the consequent extra visitors.

Maydena:

- Whilst noting that many of the 'wilderness' tracks are still closed after the bushfires and there is no apparent date for their reopening, note 13 only says that PWS will have to invest money, not that they have already allocated money. Any time delay on undertaking repairs adds to the degradation of these tracks, and therefore increases the cost of the repairs.
- There is no need for the adventure-adrenaline focus to be within the TWWHA - there are plenty of suitable, accessible locations outside the boundaries.

3.5 Cultural Presentation Hubs (pages 28 – 30)

- We assume that the aboriginal community was involved in the formulation of this section and found it acceptable.

3.6-7 Journey-based experiences (page 31)

- We have no problem with this concept - it is far better to keep high numbers of visitors near to roads and other already modified landscapes, than to encourage them to venture further into the TWWHA. They are still able to experience the quality of wildness without directly impacting on the wilderness itself.
- Gordon River Road and Styx Valley Road:
 - The mention of closures needs elaboration.

3.8 Remote experiences (page 34)

- We are pleased to see that there is a recognition of the desire of the Tasmanian community to continue visiting the TWWHA without limitation or restraints, and this should apply equally to popular places like Cradle Mountain (which has a long, established history of recreational use by locals) as to the more remote areas. There is widespread concern among local bushwalkers that their established way of life is being progressively eroded in the rush for more tourism. This is already occurring at Cradle Mountain and Freycinet National Park (and may well also happen at Mt Field National Park). We are regularly hearing more and more locals saying that they are unlikely to visit Cradle Mountain and Freycinet again because they have been spoiled by over-promotion and the massive increase in visitor numbers. This effectively

amounts to Tasmanians being robbed of the use of their own National Parks, *not an acceptable outcome*.

3.9 Remote experiences recommendations (page 35)

The South Coast Track and Frenchmans Cap Track:

- These should not be a place for commercial private huts as they result in the devaluation of the wilderness experience for walkers. Private huts also exclude the public from public land.

Overland Track:

- To protect both conservation values and visitor experience will require capping of visitor numbers and limiting any further hut construction.
- Commercial operators should be strictly limited. The Overland Track is in serious danger of becoming a cash cow for private operators to the detriment of the experience for everyone.

Walls of Jerusalem:

- This area is already at substantial risk from over-use, and further commercial operations would be detrimental to the whole idea of remoteness and self-reliant recreation. Infrastructure, aside from hardened tracks, toilets and tent platforms, should be avoided. Management of non-commercial groups is also essential.
- The retention of the wilderness experience is paramount, but erosion of the true wilderness character is changing the situation. Not very long ago the Walls were considered a wilderness experience, a situation that is rapidly changing due to increasing visitation.

4 Aboriginal cultural values initiatives

- We are assuming that this section was written in collaboration with the Aboriginal community and has been approved by them.

4.4 Aboriginal involvement in decision-making (first dot point, page 46)

- All Tasmanians should have access to the first stage of the EOI so that non-indigenous Tasmanians are given the opportunity to have their personal (and indeed cultural) values considered. Natural values should be considered on the same basis.

5 Other initiatives

5.2 Wayfinding (page 50)

Final paragraph:

- It would be very worthwhile to use electronic media to convey critical information, but to be effective it must be multi-lingual and strongly worded so that there is no opportunity for misunderstanding the information.

6 Strategic guidance

6.2.2 Carrying capacity (page 55)

- The relationship between the number of visitors and impact may not be linear, but there is tangible, visible on-ground evidence in the more popular areas that more visitors equates to greater damage to the environment. *Difficulty in mathematically defining the correlation should not be used as an escape clause to ignore the problem.* In sensitive environments like the TWWHA it is difficult to mitigate the effects of excess visitor numbers. At this stage it appears as though the tourism

industry has no idea of likely future rises in visitation, and no concrete plans on what to do if numbers go beyond what is environmentally sustainable (and it is likely that point has been reached already in the more popular areas). Being reactive rather than proactive can only lead to increasing and irreversible damage to the TWWHA and to visitor experiences.

6.3 Events (page 56)

- Limiting participant numbers is a positive move, but the overall number of events should be restricted to reduce the chance of a cumulative negative impact on the environment and also on visitor experience.
- Figure 3: Visitor management framework:
Limiting car parking spaces and forcing the use of shuttle buses can result in disadvantage to experienced local bushwalkers, who often wish to undertake longer daywalks and who may need correspondingly longer on-trail hours than those enabled by the shuttle bus service, particularly in the off-seasons favoured by this user group. This is already becoming a problem at Cradle Mountain. There can be associated safety issues with this system whereby walkers may be stranded in deteriorating conditions after missing the last outgoing shuttle bus – which can easily happen at the end of a long off-season walk due to unpredictability of weather and walking route conditions. This user group will tell you that nothing beats the security of having a private car available at the trailhead for transport out regardless of time of walk completion.

6.4 Science, research and conservation (page 57)

- Some areas already have voluntourism, and it has proven to be beneficial from the point of view of the environment and the volunteer. It also provides a positive perspective and increased awareness of the importance of the TWWHA.

6.5 Access (page 57)

- We strongly agree with community concerns about air access over the TWWHA, and stress that the impact on the wilderness experience by helicopters in particular is enormous. Suggesting that a limited number of flights over a particular area is of little concern (as evidenced by the recent Halls Island EOI) is a vast misrepresentation of both community sentiment and reality.
- It would be beneficial to list or show on a map the landing sites which are allowable in order to enable the community to assess possible future impacts from aircraft. Scenic helicopter flights in the Cradle Mountain area have already detracted greatly from the environmental values that attract visitors.
- Given the known substantial impact that aircraft can have on TWWHA values, PWS needs to have the power to restrict and manage flyovers and scenic flights. Without those powers the Fly Neighbourly Agreement suggestions are easily disregarded and hence potentially worthless. The recent 14-16 helicopters landing within the TWWHA is a warning of what could become a regular occurrence that would be disastrous for the values of the area. Furthermore, the shortfall in PWS power in the matter was emphasised by the expression of intent to return from the company that ran that operation. The FNA needs substantial upgrading, or preferably replacing with a stronger management tool, to provide PWS and other authorities with the necessary powers to prevent this type of incident happening.

6.6 Quality assurance (page 58)

- The critical point here is that 'uncontrolled and poorly managed tourism can have severe consequences for the site's integrity, compromise its OUV, and produce social and cultural impacts'. There needs to be some form of limit on the amount of accommodation allowed to be constructed in areas such as the Cradle Mountain gateway precinct. The fact that this area is outside the TWWHA is beside the point, as the vast majority of the extra visitors will enter the TWWHA (in accord with the *main promoted reason* for a stay at Cradle Mountain) and will add to the human impact on the values of the area.

6.7 Strategic data collection and analysis (page 59)

- Very often the data collection is focused on tourists, rather than locals who have a longer association with the area and are likely to notice (and care about) signs of degradation earlier. There needs to be an easily accessible way for regular and local visitors to have ongoing input into the future directions of the TWWHA.
- Monitoring the degradation of walking tracks caused by increasing visitation is only part of the solution. Unless recommendations from that monitoring are put into practice the degradation will progress to a stage where the damage is irreversible. Track maintenance is ongoing and expensive - there needs to be sufficient funding for this in the long term, and over a wide area. It also needs to be remembered that the best-maintained walking track in the world will not compensate for excessive crowding, which can severely impact the experience of nature that many visitors seek, and can lead to an outward expansion of visitor impact as an increasing percentage attempt to escape the crowds on the most popular tracks. This is already evident at Cradle Mountain.

6.8 Strategic guidance recommendations (page 61)

Aircraft access policy:

- Clear policy is essential, but it needs to include safeguards that prevent the government of the day from making changes to conditions to suit a particular EOI, for example the Halls Island proposal.

Fly Neighbourly Agreement:

- At present the FNA is a toothless tiger. There needs to be a procedure whereby those who breach the FNA are fined and/or banned from flying over any part of the TWWHA.

7 Assessment guidelines

7.1 Purpose of assessment policy guidelines (page 66)

- To have publicly available policy directions is good in theory, but the present EOI process is highly secretive, meaning there is little opportunity for the public to compare those policy directions with proposed activities/ infrastructure within the TWWHA. Currently the Tasmanian public has very little confidence in any processes dealing with developments within the TWWHA, and suspicion levels are high.

7.3 Social and economic considerations (page 67)

- Some projects that have been processed appear to be neither financially viable nor beneficial to the community. Interestingly these are the projects that fail to get publicised because they are 'commercial in confidence'. It does not inspire confidence in the process.

- We are concerned that Tasmania does not have business case guidelines (why not?), despite the EOI process having been in operation for some years, and we question the use of the Victorian guidelines. Surely business case guidelines for an island state would differ from those of a mainland state which doesn't have the same barriers to access from other states or countries.
- Rather than just having 'consideration of economic costs' associated with infrastructure removal, an environmental bond to cover those costs should be incorporated into any proposal that is given approval.
- Social impact assessments are essential, as it is becoming obvious that many local Tasmanians are becoming frustrated, feeling that their own traditional recreation areas are being negatively impacted in the eternal quest for the tourist dollar. A social impact assessment is only worthwhile if actions are taken in support of those who are feeling disadvantaged.

7.4 Bushfire management (page 67)

- The impact of landscape-scale fires has been subject to investigation after recent devastating fires. It may be possible that a change in the approach to firefighting may mitigate some of the potential damage.
- We agree that infrastructure should be placed outside the TWWHA to minimise land-clearing for bushfire protection. The environment should be paramount.
- Examples of refuges for use in bushfires would be beneficial, to clarify options.

7.6 Noise pollution (page 69)

- It is important to acknowledge the impact of noise, but the idea that the person being impacted has a 'sensitive nature' carries the implication that noise shouldn't bother 'ordinary' people. We have personally encountered the argument that because a proportion of the recent large expansion in tourist visitors are from noisy, crowded megacities, they are not likely to be bothered by noise. Apart from the observation that some of these visitors may actually come to the TWWHA for a unique experience of real quietness, we also ask why should the sensitivities (or lack thereof) of a recent new class of visitors take precedence over the many dedicated wilderness devotees who were already visiting the TWWHA for its quietness and other natural values. We have also observed the impact of excessive noise, for example from helicopters, on wildlife, with animals obviously disturbed and frightened. The point should be made that intrusive man-made noise simply doesn't belong in a natural environment – it was no mistake that famed Tasmanian wilderness photographer Peter Dombrovskis titled his first book 'The Quiet Land', and does anyone want that to become a misleading description?
- The 'vexed questions' carry an admission that no matter where you place an aerial traffic corridor, whether following track corridors or away from them, the TWWHA ambience will be negatively impacted for some visitors. Perhaps it would be wiser to limit aerial traffic over the TWWHA to Search & Rescue and specific PWS purposes.

7.7 Group numbers (page 69)

- Rather than 'recommended' group sizes, the maximum sizes need to be hard limits. There have been many comments on various websites about large school groups commandeering huts on the Overland Track, and generally reducing the enjoyment of others with noise and behavioural issues. For many people this is a once-in-a-lifetime experience, and for Tasmania it is a single opportunity to showcase a unique environment.

- Campsites of 25 tents could be expected to house many more people than a nominal 25, and it may be more than the facilities at that location can handle.

7.8 Visual impacts (page 70)

- Visual consistency with the existing environment for any infrastructure is ideal, but frequently architects wish to put their 'signature' on the design which can be at odds with the brief. An example of this is the new 'shelter' at Dove Lake, which shows a lack of empathy with its surroundings, suggesting that the architects have not put their design *into* the landscape, but *on* it. Public feedback at the recent announcement of construction commencement was overwhelmingly negative, which is not surprising given that during the consultation process it was clear that the agenda was set, and no amount of public input would result in changes to the design – a fact that was immediately evident when the post-consultation design was announced. It is one thing to go through the motions of a process of public consultation, but a much more important step to take any notice of public feedback.
- Photomontages are a flawed method of depiction of designs. Many of the techniques used can be manipulated by developers/architects in order to minimise the true visual impact. An independent assessment should be required, whereby the depiction is created by someone who assembles the photomontage from the architect's plans.

7.9 Visitor accommodation, huts and camping (page 71)

- Stricter controls are needed on standing camps in Self-Reliant Recreation Zones, as some would be almost impossible to remove without significant damage to the surrounding environment.
- Before any guidance to be provided by PWS becomes official there needs to be public/community input, in order to provide as broad an input as possible.

7.11 Protecting natural values (page 72)

- This section acknowledges the impact of increasing visitor numbers, yet tourism promotion continues unabated, putting the values of the TWWHA at risk.
- Increased mechanised access also negatively impacts the experience of visitors. A helicopter flight might only cater for a handful of people within it, but many more people on the ground potentially have their wilderness experience ruined.
- If there is the potential for information to be insufficient to ensure the integrity of the TWWHA, EOI projects currently in process should not be given the green light until the guidelines are updated.

7.12 Protecting cultural heritage values (page 73)

- We assume that this section has the approval of the aboriginal community.

7.13 Biosecurity (page 74)

- For biosecurity, the main factor that has to be controlled is visitation, particularly by overseas visitors, or by those who have little knowledge of the vulnerability of our unique environment. Increasing tourism is pushing people further into the TWWHA, and the risk of biosecurity breaches increases correspondingly. Tourist helicopter landings in the TWWHA represent an unacceptable risk which is not being considered seriously enough in the current EOI process.

7.14 Cumulative impact (page 74)

- The current EOI process considers each proposal as a discrete operation without consideration of other proposals, or of the associated impacts that can occur such as helicopters flying overhead on their way to an ecotourism site.

- The lack of consideration of cumulative impacts over time suggests that there should be a backing off from the increasing pressures being applied to the TWWHA, and a more controlled holistic approach to any tourism proposals within the TWWHA.
- Since each EOI is considered in isolation, it is unlikely that there are plans in place to mitigate potential cumulative impacts, which can eventually completely alter the character of an area or region even though the net magnitude of change was not necessarily obvious at each step along the way.

7.15 Impacts on wilderness value and quality (page 75)

- The 82% of Wilderness Zone mentioned here can be negatively impacted by developments around the boundaries - even though infrastructure may be physically located outside the wilderness area, published research studies have shown that a substantial area around man-made infrastructure has the potential to impact on the integrity of the wilderness.
- Tourism developers generally want their development to be as near to the wilderness as physically possible so that fact can be used as a marketing tool. This can push impacts further into the TWWHA unless very carefully and sensitively managed.
- The public is generally excluded from the assessment of the impact of a development on wilderness quality or values, due to the Government classifying most development proposals as 'commercial in confidence', thereby controlling what information is made public.

7.16 Approach to public infrastructure (page 76)

- Infrastructure undertaken by PWS has a different purpose to private developments, and some allowance should be made, within reason, as long as it conforms with the recommendations within this plan.
- Questions have to be asked as to how the Dove Lake shelter sits within this framework (and whether it would even have been approved under the constraints outlined in paragraph 2 of Section 7.16 here), and whether this will be an example of the future direction and style of PWS involvement, despite the public backlash against the structure on numerous grounds.
- We agree that requiring public infrastructure to be designed for multiple users and purposes is sensible, as this reduces the number of individual private developments for the exclusive use of paying customers.

7.17 Assessment policy guidelines (page 76 – 85)

Policy guideline APG1

- A substantial environmental bond should be required from any potential developer before approval is given for a private development, in order to cover the cost of removal and rehabilitation if necessary.

Policy guideline APG2

- The use of the subjective term 'unreasonable impact' is a concern. Who determines whether an impact on existing recreational users and nearby communities is 'reasonable'? It is critical that existing recreational users and nearby communities are given a strong voice in any decision-making. Their views are based on experience and should be respected, and safeguards should be built in to the system to ensure that there are no negative effects on them from any tourism venture.

Policy guideline APG4

- The Lighting management plans need oversight by PWS or another authority to ensure compliance.

Policy guideline APG5

- Noise pollution impacts within the TWWHA are of critical concern, but these concerns often seem to be ignored by PWS management, perhaps due to Government pressure, for example helicopter use permitted for the Halls Island development proposal at Lake Malbena.
- There needs to be an independent authority to monitor, and have the authority to veto, a development that doesn't comply and risks the OUV on the basis of noise pollution.

Policy guideline APG7

- Visual impact assessments need to be undertaken by an independent authority so that the proponent doesn't present 'fudged' depictions from unrealistic angles.

Policy guideline APG8

- Lodges and hotels for visitor accommodation have no place inside the TWWHA. These should be located outside the TWWHA boundaries.

Policy guideline APG9

- The guidelines for sustainable construction are reasonable, but could be improved by adding additional criteria requiring the ability for uncomplicated complete removal of the structure, funded from an environmental bond.

Policy guideline APG14

- We assume that the Cultural heritage assessment guidelines have the support of the Aboriginal community.

Policy guideline APG12

- The policy guidelines covering cumulative impacts are absolutely critical. It is imperative that PWS remains independent of government pressure, *and* is required to consider potential impacts, *and* that any development that fails to satisfy any of the criteria is not approved.
- We note however that PWS is answerable to the government of the day, and there are likely to be pressures placed upon them by the tourism industry to allow multiple developments that, when combined, impact negatively on existing wilderness values.

Policy guideline APG15

- While a commendable guideline on paper, the Dove Lake shelter development suggests that it is unlikely to match reality, due to pressure from both the state government and the tourism industry. The Tasmanian public reaction to the Dove Lake development has been overwhelmingly negative, but despite submissions received from the public during the period of consultation pointing out the inappropriateness of the shelter, there was an overwhelming feeling during the process that the plans had already been made and there was no intention of changing them. This approach needs to change if there is any wish to gain a social licence from the many Tasmanians with an active interest in the TWWHA and its future.

SUMMARY of our position:

- We consider that the present management of the issue of tourism development in the TWWHA (and also in Tasmania's other national parks and reserves) is compromised by a shortfall in recognition that these are environmentally sensitive areas with a finite carrying capacity (in regard to visitor numbers), which if exceeded carries a genuine risk of damaging both the natural environment and the wilderness experience of visiting these remarkable areas. For this critical reason, tourism in the TWWHA (and elsewhere in Tasmania's reserve system) *must not* be considered to be compatible with the same type of constant growth model which is an almost universal (and often flawed) assumption in the development of industries worldwide. A vital factor in managing the TWWHA and other Tasmanian reserves is being willing and able to recognise when to significantly reduce (or even halt in some cases) active promotion of a further increase in tourism-related visitor numbers.
- It is evident that an increasing number of Tasmanians are becoming very frustrated at the impact that the arrival of rapidly expanding crowds of tourists is having on their long-standing traditional amenity in, and access to, our most popular national parks, including those in the TWWHA. At popular nodes like Cradle Mountain, Tasmanians are increasingly feeling like second-class citizens before the juggernaut of the tourism industry, and the number of Tasmanians who have sworn not to visit this superb area again is sadly, ever increasing (not a fair or desirable outcome). It is unacceptable to Tasmanians to be 'processed' through the same systems used to manage large numbers of first-time tourists (these are fundamentally *our* reserves, after all), and the system needs to be more adapted to accommodate the traditional requirements and unique usage patterns of Tasmanian visitors – for example, experienced bushwalkers wanting to do a long daywalk requiring a very early start from Dove Lake, or a family group on a day trip wanting to take their private vehicle with gear aboard into Waldheim for a picnic lunch. It is not acceptable to sidestep the issues that exist at Cradle Mountain (which may well be mirrored at other popular accessible nodes in the future) by quoting the 82% of Wilderness Zone available as an alternative – that zone is mainly aimed at multi-day wilderness backpacking usage patterns, which are quite different to the modes of traditional Tasmanian usage at accessible nodes like Cradle Mountain, Lake St Clair, Mt Field etc.
- We consider the possible construction of multiple private commercial developments within the boundaries of the TWWHA to be incompatible with the OUV of the area, and risks damaging the wilderness character and the wilderness experience. For the same reasons we are not in favour of expansion of commercial helicopter and other light aircraft flights across the area.
- A substantial and increasing number of Tasmanians, particularly those with the greatest past associations with the TWWHA, have been feeling left out of the loop in the government's secretive EOI process for development ideas within the TWWHA. There is a widespread suspicion that the 'Commercial in Confidence' tag has been used as a tool to conceal from the public the details of what is planned in some areas

until it is too late to change them. There is also widespread awareness that these are public lands, and that the public should have been kept fully informed of what is intended for each development right from the start of the process. The EOI process is in need of radical change to re-establish public trust if it is to have any hope of social licence for individual developments that arise from it.