

19 June 2020

TWWHA Tourism Master Plan Project Manager
Project Management Office
PO Box 44
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Submission for: **TWWHA Draft Tourism Master Plan**

Dear Andrew

I am a regular recreational visitor to the TWWHA and have been for over fifteen years with my family. I currently work part-time as a bushwalking guide in the Tasmanian National Parks. I have been involved in workshops for the TMP and appreciate the opportunity to contribute again.

The TWGA (Tasmanian Wilderness Guides Association) are providing a submission that I support.

In addition, I submit the following points.

The definition of actions and project methodology.

I commend PWS on the consultation for the Draft TMP to date. The Strategic Guidance Recommendations (Section 6.8) and the Assessment Policy Guidelines (Section 7.17) are a positive steps forward, however at this stage a large number of them appear aspirational and as stated in the Draft TMP they require the development of actual frameworks and actual guidelines that can be implemented in practice.

The current project timeline has Draft TMP > Public Consultation > Final TMP. This implies that the Final TMP will not have actual frameworks and actual guidelines defined and they will be completed by PWS without public consultation.

I know some content in the guidelines will be controversial however I propose that it is better to develop controversial guidelines in full public view and have the robust public discussion and debate once, rather than developing controversial guidelines behind closed PWS doors and having public opposition with lengthy legal proceedings (aka Malbena) for every proposal.

In terms of the Strategic Guidance Recommendations and the Assessment Policy Guidelines I therefore recommend that the following points are addressed:

1. Defined timelines for development and implementation.
2. Definition of stakeholders who will be consulted in the development phase.
3. Definition of the points in the process where further public consultation will happen.

This would ensure that the complete development of the TMP is carried out with the full consultation of the stakeholders who care deeply about the TWWHA.

Please take this opportunity to build the trust of the Tasmanian community in the ability of the Tasmanian PWS be an effective custodian of the TWWHA in a transparent way and to move on from the political overtones that have surrounded a number of the PWS processes in recent years.

Comment on specific items

Section 2.2.1

This section raises the paradox between accessibility and wilderness as a key community concern. I welcome the initiative to address this in **APG13**.

Visitors do experience wilderness values to various degrees in the Recreation, Self-Reliant and Wilderness zones. The concept of assessing wilderness values and managing the intrusion from humans and technology should apply to all zones. (Noting that the visitor zones have their own necessary function as a place to begin the transition from human shaped landscapes to wilderness landscapes).

I propose that APG13 applies to all zones as below.

Tourism and presentation proposals in **all zones of** the TWWHA are to demonstrate an appropriate level of retention of very high-quality wilderness values and, where possible, a no net loss or an increase in lesser quality wilderness values to ensure large expanses of remote and largely undisturbed area are maintained and enhanced over time.

I also propose that the scope of application is broadened to include noise as an impact. Consider the following scenarios

- 1) I have walked 3 hours from the carpark and I stand on a track in a Recreation zone looking out onto the Wilderness zone and I do not see any man-made structures, except for the track, nor hear anything except the wind across the plateau. I can immerse myself in that wilderness experience even though I am in a Recreation zone.
- 2) The same experience described above is very different if while standing looking out onto the wilderness zone I am interrupted by the buzz of a helicopter taking tourists on an air tour. In this instance my journey from the car park is erased and I am back in the human landscape, the wilderness experience has been lost, spoiled by the mechanised intrusion.

I suggest that APG13 be expanded to include the noise impact of mechanised transport by proponents whose commercial business is leveraged off visiting the TWWHA by mechanised means. I'm not suggesting commercial airlines flying from Hobart to the mainland are the subject of this, however there needs to be an integrated approach to protecting the wilderness values in the TWWHA from the intrusion of mechanised transport.

I understand the flight movements of aircraft that do not land in the TWWHA is out of PWS jurisdiction. However if the assessment of the noise impact of mechanised transport on TWWHA is included in PWS processes then the public can at least lobby key Government stakeholders to manage the protection of wilderness values in the TWWHA.

Proposal: Wording change in APG13:

To support the attainment of this policy outcome, the PWS will require an assessment for all infrastructure and buildings, including the rerouting of tracks, toilets, huts **and mechanised transport routes in or over TWWHA**, regardless of proponent,

I welcome the "review of current methodology for wilderness quality" and suggest that it considers the recent work by Hawes, Dixon and Bell in their book "Refining the definition of Wilderness: Safeguarding the experiential and ecological values of remote natural land". I suggest that a

selection of the best practice with regard to “assessment of wilderness quality” is made and adopted.

Proposal: Wording change in APG13:

and a review of current methodology for wilderness quality **and adoption of the selected best practice approach.**

Section 2.3.4

I support the content of the visitor experience statement for the Self-Reliant Recreation Zone.

I want to emphasise the importance of the “journey” in this zone. It is also important in the Recreation and Wilderness zones. The wilderness experience is a result of the journeys we take through the TWWHA and the places we visit in the TWWHA .

“In the Self-Reliant Recreation Zone, you are likely seeking an *iconic journey in which you can achieve a high level of independence in experiencing the Tasmanian wilderness. On these journeys, you can expect to experience remoteness in challenging but accessible country.* You can take these journeys independently or with like-minded small groups with knowledgeable and experienced guides.”

The type of access permitted in the Self-Reliant Recreation Zone should be aligned with the intention of this wilderness experience. Mechanised access is *not achieving a high level of independence*, in fact quite the opposite. Mechanised access bypasses the immersive experience of the “journey” through the wilderness for the participants and diminishes the experience of other visitors in the zone.

Proposal: Section 2.3.4 is updated to “exclude mechanised access, except for operational / safety reasons by PWS and rescue authorities”.

Thank you for your consideration of these points.

Your sincerely

Dave Lane