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Dear Planners,

Thank you for your invitation to submit our views to the DRAFT TWWHA Tourism Master Plan 2020. Below is our submission.

Regards,
Geoff & Janet Fenton

**Submission from Geoff and Janet Fenton,
leaseholders at Melaleuca, Southwest Tasmania.**

General comments

We are pleased to see that the draft TMP has incorporated many of the views put forward at the public forums held last year.

We wish to reiterate that PWS needs much better funding if it is to support the ideals expressed in the Plan. In recent years there has been insufficient funding for basic maintenance in parks. There is barely even a ranger presence at Melaleuca and the Port Davey Marine Reserve. How can the TWWHA be advertised as a destination when there is so little on-ground support?

- The Plan states that more detailed prescriptions are needed for Port Davey and Bathurst Harbour. Also that a South Coast Recreation Zone Plan and boat and air access policies are to be written. This seems a sensible way forward. Will there be an opportunity for interested individuals or groups such as Friends of Melaleuca Wildcare volunteers to comment on these prescriptions?

p 49-50 Potential Opportunities Map

- This map shows boating around the South Coast, and kayaking on Bathurst Harbour. Tourism businesses already operate in these niches, so surely they are not *potential* opportunities? Bathurst Harbour kayaking opportunity has already been filled by a multiple award-winning business, Roaring Forties Kayaking. Five boat based tour operators already take groups around the South Coast.
- Any tourism enterprise working in the far Southwest faces economic limitations created by:
 - a short tourist season,
 - difficult access
 - and challenging climate. (Dates have to be flexible and guests are sometimes weatherbound. Guests cannot be guaranteed their flight connection.)

- A business that is succeeding in a niche may be jeopardised by new similar licences. The **number of operators as well as the size of tour groups** that an area can support is limited by the above factors, and should be limited by recreational standards and assessment criteria including carrying capacity, natural values and cumulative impact.

7.5 Light.

- The limiting of artificial light in the TWWA is an excellent prescription. Large night lights can be damaging for birds and insects, and dark nights can even be a new experience for some guests.
- Dedicated Dark Sky experiences are wonderful, but usually involve star gazing. Note that the frequent cloud cover and rain clearly make the TWWHA unsuitable for such experiences, while the Australian desert is ideal. Good tour guides currently working in the TWWHA already opportunistically engage guests with the night sky when conditions are favourable, and training for guides could improve their knowledge.

7.11 Natural values.

- Wake waves are impacting Melaleuca Inlet with so much river traffic. Boat speed limits need to be more actively regulated.

7.14. Cumulative impacts

- We are pleased to read that the TMP states that 'The cumulative impact of tourism activity across the whole property is also an important consideration' (p.11). We hope the risk of degradation of the natural and cultural values over time is borne in mind when issuing licences to tourism operators. Even Eco-tourism has an impact. Each addition of infrastructure may seem acceptable in itself but the cumulative effects can be far-reaching.

South Coast Recreation Zone Plan

- Habitats and natural values are being eroded at an alarming rate around the world. Shorebirds are in a particularly dire position. The beaches along the South Coast offer relatively undisturbed habitats for birds such as the Hooded Plover. These habitats should not be compromised by the presence of helicopters nearby.
- We are concerned that although helicopter use is allowed in the South Coast Track, area for servicing and construction (point 6.5), a commercial huts enterprise would create a lot more helicopter activity than currently occurs, for construction of the prefabricated huts planned, and more importantly for ongoing maintenance, servicing and resupply. Freight, transport of personnel and resupply by boat is impractical along the South Coast due to marginal and highly weather dependent landing sites. Carrying freight between landing sites and hut sites would also create extra spur tracks.

- Social impact: Helicopter noise would impinge on the visitor experience anticipated by other track users. The South Coast is labelled as a Remote Experience!
 - Cost-benefits will be limited by the short tourist season and limiting to guests able to cope with the difficult terrain and weather. Up-grade (and ongoing maintenance) of the track to a level suitable for this type of tour group would be extremely costly. These factors make the South Coast a much more difficult proposition than the Three Capes walk which has easy terrain, benign climate, easy access and can be available year round.
 - Other issues of concern are treatment of grey-water, wild fire and competition with other commercial operators who take guests along the South Coast.
 - We are alarmed that The South Coast Track Huts Walk was given a substantial Federal grant on what seemed an insubstantial proposal. Was there any social engagement by the protagonist?
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