

Public Submissions

Summary Draft Tourism Master Plan

Final for DPIPWE

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1 Introduction

1.1 Purpose of report

The draft Tasmanian Wilderness World Heritage Area Tourism Master Plan (draft TMP) was placed on public exhibition for a 14-week period from 19 March 2020 to 25 June 2020. This report is a summary of the feedback arising from the 44 public submissions that were received relevant to the scope of the project.

Key themes (i.e. where multiple submissions raised the same or similar points) are outlined in Section 2, with other matters summarised in Section 3.

Submissions received are publicly available and can be read in full [here](#).

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2 Key themes

2.1 Aboriginal cultural heritage

A number of submissions expressed general support for the preparation and rollout of customised Aboriginal heritage and cultural awareness training for the Tasmanian Wilderness World Heritage Area (TWWHA). There was a recognition of increasing visitors' understanding of the significance of Aboriginal cultural values and the benefit to presentation of the TWWHA.

Concern was raised about joint management not forming part of the draft TMP and the need to review the governance framework for the TWWHA. This included actions identified in the Tasmanian Wilderness World Heritage Area Management Plan 2016 (Management Plan) to achieve Aboriginal joint management.

2.2 Activity nodes

Some submissions suggested potential amendments to the activity node hierarchy, including:

- Strahan as a primary activity node and a primary cultural presentation hub (not a gateway town);
- Queenstown being recognised as a gateway town. Queenstown is home to several experiences that tell the TWWHA story and is a gateway for drive journeys, walkers and rafters. It was identified that there should be a plan in place to support these users of the TWWHA and provide information and guidance for them in Queenstown;
- Consideration for additional secondary visitor nodes/gateway towns in the Western Tiers, Deloraine and the Huon Valley; and
- Recognition of entry points and associated accommodation locations for angling in the TWWHA. Miena was identified along with Central Lodge, Great Lake Hotel and Thousand Lakes Lodge as well as the Augusta Lake Road. It was identified that the majority of anglers (visiting, guided and locals) plus many bushwalkers and photographers use this access point.

2.3 Built infrastructure

Several submissions opined that no more commercial developments should be built in the TWWHA. Some suggested that public infrastructure should remain on the edge, with increased investment in edge nodes and the maintenance of the wilderness values of the more remote parts of the TWWHA. There was support for placing infrastructure in existing towns on the edge of the TWWHA as described in Strategic Principle 3.

Regarding public infrastructure, some submissions identified the importance of equality of access to the TWWHA both in terms of physical capabilities (incorporating disability access in the management and infrastructure priorities) and in socio-economic terms (access for all rather than the elite few). It was noted that equality of access, particularly in socio-economic terms, goes beyond built infrastructure, with submissions commenting that regardless of people's socio-economic status or whether they are commercial or independent walkers, when it comes to experience in national parks, every person is equal. A concern was raised about the impact of helicopter access and commercial infrastructure on this equality.

2.4 Cost-benefit analysis

Some submissions raised concerns about the cost-benefit analysis identified by the draft TMP as the tool to address the economic viability requirement in the Management Plan. These concerns included questioning the reliance on Victorian guidelines, money being the wrong unit for measuring the values of the TWWHA, and the need for environmental bonds.

2.5 Definitions

Concern was raised that Tasmanian bushwalkers and other Tasmanian recreationalists (such as kayakers, rafters, rock-climbers, photographers, and skiers) were included in the category of visitor. It was opined that it is incorrect to classify them as a visitor when the care, sense of responsibility, work undertaken and generational associations that these Tasmanians have with the TWWHA is much greater than a 'visitor'. There was concern that this definition may result in their rights being equal to an overseas visitor who comes to the TWWHA only once in their lifetime.

Some submissions identified that there is widespread concern among local bushwalkers that their established way of life is being progressively eroded due to the growth of tourism and that the TMP must clearly identify protection of recreational walking by Tasmanians. Concern was also raised that in strongly acknowledging the Aboriginal cultural values of the TWWHA, as part of the Outstanding Universal Value (OUV), the draft TMP does not sufficiently recognise modern recreational pursuits as being cultural in character or having cultural elements.

Some submissions also made the point that the definition of sustainable should not include reference to *a certain rate of growth*.

2.6 Experiences

Some submissions raised concerns about specific activities not being addressed in the TMP. This included trail running and the wellness visitor. Similarly, concern was raised that there was not enough focus on particular activities, such as adventure experiences (including alpine activities, rock climbing and whitewater rafting), angling and events.

2.7 Historic heritage

There was concern in some submissions that European historic heritage is not recognised or mentioned often enough in the draft TMP. It was identified that there needs to be a greater emphasis on European historic heritage not just Aboriginal cultural heritage.

2.8 Research and management

Suggestions were made in some submissions about data collection, research and management. These included:

- Ensuring PWS has sufficient funding;
- Research being too focused on tourists rather than locals;
- The need for research to better understand the benefits of accessing parks and reserves and the barriers to this access;
- The need to incorporate guides/commercial operators in research and conservation projects;
- Acknowledgement of the need for active administration of commercial operators' licences and leases to better manage compliance; and

- Making all operators subject to ongoing monitoring and auditing by PWS to ensure they are delivering high-quality operations and continuous improvements against economic, social and environmental goals.

2.9 Strategic principles

There were a number of submissions that identified or suggested that protecting and maintaining the OUV is by far the most important principle and the reason it is a World Heritage Area. These submissions identified that *Strategic Principle 1 – Protecting and maintaining the OUV* should be given a higher weighting than the other principles. Furthermore, referring to the *balance* between protecting and maintaining the OUV and the presentation of the TWWHA also raised concerns, in that the protection of the OUV was more important and that balancing the two was inappropriate.

2.10 Timing

Concerns were raised about the timing of the preparation of the TMP as well as a perceived lack of timing/clear priorities included for the actions identified. Similarly, there was concern that an increase in tourism development and proposals may occur before certain actions are fulfilled and that the finalisation of the TMP should not occur before certain policies are reviewed and documents prepared.

For example, the question was raised as to how a tourism development could be allowed to start up or operate without the air access policy, cumulative impact assessment, and guidance document for visitor accommodation being prepared and implemented.

2.11 Tourism guidance

Some submissions opined that the draft TMP does not adequately provide clear and strict criteria for tourism development that would give tourism proponents and the community clarity. Concerns were expressed that current and/or future guidelines may not be publicly available, that the TMP did not provide sufficiently strong guidance, and that it would not resolve conflict over the type and scale of tourism development in the TWWHA.

In relation to specific implementation time frames and priorities, concern was raised about measurables being better identified in the document. Many controversial issues (such as aircraft traffic, definitions of a standing camp and a methodology for assessing 'wild character' of areas) were considered as not being addressed in sufficient detail.

Several submissions sought a specific limit to visitor numbers to protect the Outstanding Universal Value (OUV) and the values of the TWWHA more generally. They opined that clarity and certainty in decision-making in a wilderness area can only be provided if a ceiling is placed on visitor numbers and on additional tourism products. For example, booking systems were identified as being required in remote alpine environments.

2.12 Wilderness

Several submissions raised protecting wilderness as a high priority. Some raised concerns that the draft TMP fails to provide adequate guidance or detail as to how a wilderness quality assessment should be undertaken, how wilderness is to be protected and what level of impact is acceptable. Some submissions suggested that no decrease in wilderness value or quality should occur. There was also concern regarding the provision of a commitment on when the methodology will be refined. It was suggested that, despite the difficulties, the TMP should propose criteria or a process to assess wilderness values.

3 Other feedback

3.1 General comments

Many of the submissions provided general commentary, gave opinions, or identified examples. These included:

- Lake Malbena was cited as an example of inappropriate development approved through the RAA process.
- The conflict between man and nature is a key component of the West Coast Brand narrative and one that aligns clearly with the TWWHA story.
- We must work to limit damaging, unappreciative activity within wilderness areas.
- Various groups seek to work with Parks and Wildlife Service (PWS) on the management of tourism, conservation, and the like.
- Support for the development of a standalone marketing plan for the TWWHA.
- The draft TMP promotes private investment and therefore is not consistent with the Reactive Monitoring Mission's view of purpose of the TMP.
- The draft TMP does not resolve the outstanding issues of commercial tourism and its impacts on wilderness, cultural and recreation values.
- Aircraft access should remain minimal.
- Support for the overall framework of TMP, policy and guidelines.
- Support for the journeys content.

3.2 Out-of-scope considerations

In addition to the matters outlined in Section 2 above, some submissions raised matters that are considered beyond the scope of the TMP project. These are identified as:

- Concerns regarding the Management Plan. These concerns ranged from the draft TMP being compromised due to the Management Plan, the zoning, allowable uses, providing for helicopter access and developments within the zones.
- The State Government's Expression of Interest (EOI) process. Comments ranged from citing the EOI process as a subversion of good planning process; concerns about the level of transparency; and suggestions the EOI process cease or be put on hold until the review of the Reserve Activity Assessment (RAA) process is complete.
- Concerns with the RAA process being a non-statutory process as well as lacking consistency and transparency.
- Concern regarding the process undertaken by Aboriginal Heritage Tasmania for the Aboriginal Heritage Awareness Training (AHAT) and Aboriginal Cultural Awareness Training (ACAT).
- Dual naming not forming part of the draft TMP.
- The need to improve emergency communications and radio safety infrastructure in the TWWHA.

4 Conclusion

There were 44 public submissions received during the 14-week public comment period. Key themes raised across multiple submissions have been summarised in section 2 above. Submissions on the draft TMP were also received from the Aboriginal Heritage Council, UNESCO, IUCN and ICOMOS. Public submissions can be read in full [here](#).

The submissions received were greatly appreciated, with all submissions considered by the Department of Primary Industries, Parks, Water and Environment (DPIPWE) in conjunction with the consultant team to determine the appropriate amendments to the draft TMP.



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