



Submission to the

Draft TWWHA Tourism Master Plan 2020 (Draft TTMP)

Tourism Developments

- The Friends of Cradle Valley (FoCV) does not support the continued development of artificial structures for commercial purposes within the TWWHA. Any such commercial developments should be on the periphery of the TWWHA but physically separated from the gateway sites of the TWWHA.
- There should be no built accommodation infrastructure or mechanised access anywhere other than in the Visitor Services Zone or Recreation Zone. Any development should only occur under a series of strict conditions that provide adequate protection for the natural values of the TWWHA.
- Loss of wilderness is potentially the greatest environmental and cultural loss that would be associated with a tourism development. Developments should only proceed if they will have minimal or no impact on wilderness quality, regardless of zoning (see above point). If some minimal loss of wilderness quality may occur, it should be offset by wilderness restoration measures such as closure of vehicle tracks, preferably in the same or nearby area. Assessments of the wilderness impact need to take account of helicopter overflights and landings during the construction phase, as well as for ongoing maintenance. Note that, whatever a management plan might arguably allow, the National Parks and Reserves Management Act 2002 *requires* that national parks managers “preserve the natural, primitive and remote character of wilderness areas”.
- A development must be genuinely environmentally and socially sustainable - including managing *any* potential issues elsewhere that are due to visitor displacement. To assist decision making, it is essential to include a statement in the TTMP regarding what level(s) of impact are considered acceptable. Note that although the Draft TTMP identifies the omission of acceptability or unacceptability of impacts on wilderness quality in the Management Plan (p76) it doesn't address this weakness itself. Such statements should be as precise and prescriptive as possible. Note that there will always be *some* impacts.
- The development should not have the potential to cause significant visitor displacement due to the loss of recreational opportunity.
- The impact of both increased visits and different types of visitors and activities should be considered. For example, the impact on walking trails and the environment by increased numbers of visitors should be evaluated. Furthermore, possible impacts on infrastructure by

increased visitation, due to commercial enterprises, must be evaluated for possible compensation.

- If a proposed development is likely to result in a reduction or rehabilitation of past resource extraction impacts, that could be considered as a positive benefit.
- Likewise, if the project has the potential to contribute to Aboriginal employment or to assist in promoting, developing and preserving Aboriginal culture, it could be viewed positively.
- A proposed activity must be financially viable *without* public subsidy or government support.
- A proposed activity must also have some community support, or social license.
- A proposed activity may be viewed as a positive if it will utilise existing access or infrastructure, or if it would facilitate its management and maintenance.

Concerns Related to Planning, Consultation, Assessment and Approval Processes for Tourism Proposals, Developments and Activities in the TWWHA

FoCV hold significant concerns regarding both the TTMP process and its validity and transparency, as well as the current assessment processes for development and activities in the TWWHA. More specifically:

- It is completely unacceptable to consult about managing tourism while at the same time, TWWHA-based tourism developments are being actively pushed and, in many cases, subsidised with taxpayers' funds. Examples of such a development is the highly controversial Lake Malbena proposal and the Tasmanian Walking Company's Lake Rodway Guided Hut Walk proposal,
- Government is leasing public land and funding private tourism development before planning assessments have been concluded;
- There is continued government secrecy when it comes to details of the boundaries and conditions applying to leases that have been finalised over public land inside Tasmania's reserve system.

The Draft TTMP states (p20) that "Additionally, to support the master plan, an updated visitor node plan to replace the *Pencil Pine-Cradle Valley: Visitor Services Zone Plan 2006* should be progressed." This plan should be developed before the final TTMP is completed.

Numbers Limits and Carrying Capacity

Numbers limits are essential at places like Cradle Valley, in order to maintain the quality of the visitor experience. The main concern is the number of visitors arriving simultaneously at Dove Lake, so there is scope to maintain or even increase current numbers by better distribution

throughout the day and across different locations. The Recreation Opportunity Spectrum considers distribution and separation over time – of day, or season. As an example, tourism and Parks staff could effectively assist in reducing peak numbers, by encouraging people to visit Parks very early or late, to get the morning light or the sunset, and to avoid crowds.

Numbers limits based on assessment of carrying capacity are a well-recognised and accepted mechanism for ensuring visitor experience, while minimising impact. The method of determining carrying capacity can however be difficult, depending on the criteria used to determine it. Cumulative impact must also be considered when identifying carrying capacity, along with monitoring and assessment of OUVs.

A numbers limit doesn't necessarily imply a cut in overall numbers, and overall, it should not be controversial because there are well-established precedents. They have been in place on the Overland Track for decades, and the shuttle bus system at Cradle effectively supports a limit on the number of visitors who will be in the valley at any one time. In general, it works very well except in peak times when people expect to arrive and have instant access. Better provision of information about the bus system, the wait, and the unique experience would change those expectations and improve satisfaction levels. Yosemite has had such a system in place for years, and it's well accepted. Cradle Valley cannot and should not be opened up to ever-increasing visitor numbers. If bus tour companies and cruise ship operators plan to take their passengers to Cradle, a booking system would manage this, and groups could access the valley earlier or later in the day, taking pressure off peak times.

Acceptable Activities

In deciding what activities are acceptable within the TWWHA, distinction should be made between adventure activities such as mountain biking and motorised off-road recreation (both of which don't require a high quality natural setting like the TWWHA) and activities that involve appreciation of nature and wilderness, which do require such a setting. The two are incompatible, and the presence of mechanised recreationists can ruin the experience of those seeking to appreciate nature and wilderness. An example is that motorised boating is not permitted on Dove Lake whereas canoeing is, and drones are prohibited in the valley, but kite flying has occurred on Hounslow Heath.

Air Access and Corridors

Aircraft operators and particularly helicopters currently don't comply adequately with the existing Fly Neighbourly Agreement, where they should fly around the perimeter of an area and follow certain corridors. Aircraft and helicopter movements can completely destroy the experience of people in the TWWHA, and in particular it affects the WHA value of 'natural quiet'. This occurs despite statements from PWS staff that registration of aircraft operators is contingent upon complying with these agreements. It clearly proves that the tourism industry should not be given air access to the TWWHA, nor control of it. Parks should at the least be recording and monitoring

overflights, and reminding operators of their responsibilities – that is after all, their role as land managers.

The TTMP should therefore contain prescriptions that limit air flight numbers and paths over the TWWHA, in line with the intent of the 1999 TWWHA Management Plan. Frankly, failure to do this may result in conflict and protest action because it is a major concern for many wilderness users, including walkers and fishermen.

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