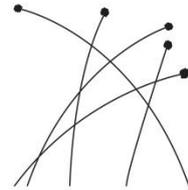


Election Manifesto

Tasmanian State Election 2018

December 2017

Tasmanian
National Parks
Association



An independent Voice for Tasmania's Parks

Launched in September 2001, the Tasmanian National Parks Association (TNPA) is a non-profit, non-government organisation which provides an independent voice on issues that affect Tasmania's National Parks and other conservation reserves. Like similar associations in other Australian States, the TNPA provides a link between the community, park policy makers and other government and non-government organisations to identify and address issues concerning the ongoing management of Tasmania's reserve system and other areas of high conservation status. The TNPA's membership reflects a range of interests in relation to reserved land, including considerable expertise in the management of natural and cultural values.

TNPA's Concerns

The TNPA has long been concerned with the chronically inadequate resourcing of the Tasmanian Parks and Wildlife Service (PWS). Combined with increasing pressure to facilitate tourism, this has caused the PWS to not only neglect its fundamental responsibility for maintaining the natural and cultural values of Tasmania's reserve estate, but has also limited its capacity to facilitate and manage the aforesaid tourism. Meanwhile, the numbers of people now visiting some attractions are impacting both the environment and the visitor experience. The vast majority of development proposals in Tasmania do not occur on reserved land and are guaranteed an open and transparent assessment by longstanding Tasmanian planning legislation. Our most urgent and specific concern is the absence of a satisfactory process to control developments on reserved land.

Tasmania has never had a legislated process to control development on reserved land because it was superfluous when there was consensus that national parks and reserves were out-of-bounds for development. This has now changed with the current State Government's policy of "unlocking" national parks and reserves for development. **Thorough scrutiny of such proposals is urgently required.**

The **Reserve Activity Assessment (RAA)** is the internal PWS' process for environmental and social impact assessment. This is a generally sound process but it is not statutory; it is defined only by department policy. There is no requirement for public release of a RAA and public consultation is required only for the most significant proposals (as determined by PWS itself).

Also of concern, the **EOI Process** (the process for the assessment of proposals submitted in response to the state government's call for expressions of interest in tourism developments in national parks and reserves) is alarmingly opaque:

- The only publically available information on the proposal itself is the extremely brief description which may not be provided until the project has been approved. **This would be quite inadequate as the basis for a development application to a Tasmanian council, for example.**
- **The assessment panel** (the majority of whom are senior public servants) **is unaccountable.** Neither their deliberations nor their report to the Minister are available to the public.
- There is no opportunity for public comment on a proposal unless it triggers some other process which does require it. e.g. a change to the national park management plan or a high level RAA.

Not only is there no public input into the assessment but the public may even be unaware of the proposal itself until far too late to influence the outcome.

The approval resulting from such a poorly considered process is likely to fail one of the key objectives of a good planning process – public acceptance. i.e. a social licence to operate, which is particularly necessary for potentially controversial developments on public land. This is not a good outcome for anyone, the public, the PWS, the tourism industry, or, particularly, the proponent.

TNPA therefore calls for:

1. A statutory process to control development on reserved land

Development control requires both **criteria** (usually set at two levels – the broad requirements contained in legislation and the detailed prescriptions contained in management plans) and a **process** to ensure that they are enforced. This process needs to:

1. Be statutory (have a basis in legislation) and clarify the relationship between the NPRMA¹ and LUPAA² – uncertainty or duplication benefits nobody. Only a statutory process can be legally challenged.
2. Be open and transparent (e.g. all information including a detailed description of the proposal and the assessment documentation readily available).
3. Provide for public comment and require a considered response to this comment.
4. Provide for third party appeal rights. These provide the public with a mechanism for enforcement of the criteria.

These are not radical suggestions – significant developments on private land have been subject to such a process for many years.

If an assessment process was defined in the NPRMA and linked to LUPAA in a similar manner to EMPCA³, this could ensure that impacts on park values are assessed by PWS and other “planning” aspects are assessed by local government, and the public comment and appeal processes are coordinated with public comment and appeal rights provided via existing LUPAA processes. i.e. no new administrative arrangements or appeal body required.

What will not be satisfactory?

- Tweaking RAA without defining an assessment process in legislation. If the process is to have the confidence of the public, it needs to provide appeal rights and the possibility of legal challenge if all else fails. i.e. it must be statutory.
- Changing developments on reserved land from *permitted* to *discretionary* in the State Planning Provisions. This would be a minor improvement on the current situation but only those aspects of the development subject to LUPAA would be exposed to scrutiny – the main impacts of a tourism development on reserved land are likely to be on reserve values and the experience of other visitors to the reserve.

End EoI process immediately - transitional arrangements necessary

It is essential that **transitional arrangements** are put in place immediately to end the EoI process and ensure appropriate scrutiny of all proposals.

¹ National Parks and Reserves Management Act, 2002

² Land Use Planning and Approvals Act, 1993

³ Environmental Management and Pollution Control Act, 1994

The development of the new assessment process and drafting of associated legislation will require serious consideration and public consultation which will take considerable time, and then the bill has to wait its turn in the legislative agenda – i.e. even if expedited, it is likely to be a year or more before the new legislation is in place.

2. Increased recurrent funding for PWS & Wellington Park Management Trust

The Parks and Wildlife Service (PWS) has been drained of resources to the point where it can barely function; currently it cannot adequately maintain either its core land management responsibilities or existing infrastructure, and lacks workable field staffing level for the vast areas it manages. This can only be addressed by an ongoing increase of a minimum of \$4 million in the PWS' annual **recurrent** funding to enable it to recruit permanent staff to address core responsibilities, including planning, and undertake long-delayed maintenance or upgrade of existing infrastructure (the TNPA's particular concern is the neglect of infrastructure installed in remote areas primarily for environmental protection).

Mount Wellington is one of the state's most visited natural tourism destinations yet the Wellington Park Management Trust has no full-time field staff or visitor centre. A minimum of \$0.5 million annual recurrent funding is required to fund essential staff, basic infrastructure maintenance and preparation of a visitor strategy.

3. Improve the reservation status of TWWHA reserves

The Tasmanian Wilderness World Heritage Area (TWWHA) has a very complicated internal land tenure, comprising 52 separate NCA⁴ reserves with different legislated reservation purposes and management objectives. While a single statutory management plan covers the entire TWWHA, the internal tenures and boundaries complicate management from both a manager's and user's perspective. The TNPA believes national park (or state reserve) is the most appropriate tenure for a World Heritage area generally and the TWWHA in particular, unless there is a good reason otherwise. Accordingly, most of the numerous, often-small lower class reserves (e.g. regional reserve, conservation area) within the TWWHA should be designated national parks, and in most cases become part of the small number of existing large national parks within the TWWHA.

4. Develop and implement a user regulation system for trampling-sensitive visitor destinations

The capacity of parts of Tasmania's parks and reserves to absorb ever-increasing visitation is limited, especially in backcountry areas. Ever-increasing infrastructure is not an appropriate solution in many situations. There are both environmental (the extreme sensitivity of western Tasmania's alpine areas to trampling impacts has been well-studied) and visitor experience (e.g. crowding) issues to consider. Implementing a booking system for Frenchmans Cap (where use has increased dramatically since the opening of a new track and a new Lake Tahune Hut, to be opened in April 2018, will continue this trend) would be a good start.

Authorised by Nicholas Sawyer. 43 Hillborough Road, South Hobart

⁴ *Nature Conservation Act, 2002*