



Comment on: Freycinet Peninsula Master Plan

Revised Draft – March 2019

Introduction

The TNPA finds the revised Draft (Revised) Freycinet Master Plan (henceforth referred to as the DFMP#2) to be completely unacceptable. Not only does it avoid addressing the main issue threatening Freycinet Peninsula, that of overcrowding, but also fails to offer protection for the values of the Freycinet National Park, and avoids satisfactorily addressing a range of other issues of major concern to the local community.

The TNPA welcomes some of the measures proposed for managing excessive visitor numbers and traffic on the peninsula, such as the introduction of a system of shuttle buses. However, the first action that must occur as part of any planning process is to establish the experience to be provided for visitors and the resulting carrying capacity of the peninsula. Measures can then be proposed to implement this.

As the TNPA noted in its submission to the previous Master Plan draft: “...**the peninsula has a finite capacity for absorbing visitors. There must be a cap on numbers...**”

The TNPA views the DFMP#2 as a document focused primarily on making money from tourists, and therefore wanting to see more of them, rather than focusing on protecting the values which make the peninsula a special place – for Tasmanians and visitors alike. The guiding document for future planning for the peninsula must be the **statutory Management Plan** for the Freycinet National Park and this Management Plan urgently needs to be reviewed and updated.

The TNPA cannot support the adoption of DFMP#2 as the final Master Plan.

The wrong focus

The main issue for the peninsula is that it is being overwhelmed by the huge and rapid increase in visitor numbers.

The TNPA takes issue with the underlying driver for the DFMP#2, which is to further the *Tasmanian Visitor Economy Strategy 2015-2020 (T21)*. This strategy aims to increase the number of visitors to Tasmania (targeting 1.5 million visitors per year) “to increase visitor spend...” (DFMP#2 p.3)

The aim of the Master Plan is to **increase** visitor numbers, along with “reducing key barriers to private investment” (DFMP#2 p.v)

Rather than acknowledging and attempting to resolve the issue of overcrowding, the DFMP#2 focuses on managing the **movement** of visitors and problems associated with too many vehicles in the National Park. While a shuttle bus system is an obvious measure for reducing **vehicle** numbers in the National Park it is likely to increase the underlying problem of too many **people** in the Park. It is likely to increase, not

decrease, overcrowding on the Wineglass Bay Track. A limit on visitor numbers is the **only** way to address the problem of overcrowding.

The local community (which should be the primary stakeholder in any plans for the peninsula) has expressed concern (in late 2017) that **the peninsula is already at capacity in terms of visitor numbers**. And numbers have increased since stakeholder consultation in 2017. Establishing and enforcing the appropriate carrying capacity for the Freycinet National Park will help ensure a quality visitor experience – for locals and visitors alike.

Freycinet National Park was one of Tasmania's first national parks, established over 100 years ago. It is a unique and beautiful area and has been a favourite holiday and recreation destination for generations of Tasmanians. Understandably, it is also a magnet for visitors. The DFMP#2, and its predecessor, the Freycinet Peninsula Draft Master Plan 2018, aim to cash in on the popularity of the area as a visitor destination - **at the expense of the values of the national park and the liveability of the area for the local community**.

The TNPA totally rejects the profit-focused driver for both drafts of the DFMP.

The driver for planning for the future of the peninsula must be the protection of the values of Freycinet National Park, as laid out in the **Management Plan** for the Park. The Management Plan identifies the values to be protected and the measures required for their protection. It is a statutory document legislated by the Tasmanian Government on behalf of the Tasmanian people. The DFMP#2 has no basis in law and is driven by commercial interests. **It appears that part of the rationale for the master planning process is to provide justification for circumventing provisions of the Freycinet National Park Management Plan. This must not be allowed to occur.**

The Steering Committee for the DFMP#2

A glance at the composition of the Steering Committee for the DFMP#2 shows clearly that the DFMP#2 is driven by the tourism industry. This is of great concern to the TNPA, a body which represents National Park users. It is also of concern to the residents of Coles Bay and Swanwick. The Committee also contains no representation from the Aboriginal community.

In order to have a more balanced and representative composition the Steering Committee needs to include representatives from:-

- The National Parks and Wildlife Advisory Committee NPWAC (This is an independent body of experts focused on the values of Tasmania's national parks and reserves). The PWS, on the other hand, is bound by the Parks 21 MOU to facilitate tourism developments in national parks and reserves.
- Environmental/conservation organisations
- The local communities of Coles Bay and Swanwick
- The Tasmanian Aboriginal community

Inadequate response to stakeholder feedback from the Draft Freycinet Master Plan 2018

The DFMP#2 states (p.v): "For the community – the Tasmanians who live, stay and recreate in the Freycinet Peninsula – the key benefit arising from the master plan will

be to enhance liveability.” Fine words but meaningless! With a couple of exceptions it is clear that the DFMP#2 has disregarded input from the local community that was sought in the lead-up to the first Freycinet Master Plan.

It was clear from 2017 stakeholder consultation that the community did NOT want to see an increase in visitor numbers.

Other areas of concern arising from stakeholder consultation in the lead-up to the Freycinet Peninsula Draft Master Plan 2018 and in submissions to that first draft plan, **and which have not been satisfactorily addressed by the DFMP#2**, include:

1. No community based environmental/conservation organisations on the DFMP#2 Steering Committee.
2. Helicopter-based tourism. There are no assurances that this will be discontinued and the community is correct in thinking that the interests of commercial tourism proponents carry more weight than those of local residents.
3. Noisy jet skis and recreational boats (the revised Plan looks to increase the volume and variety of commercial boat operations)
4. Concern that the Master Plan does not adequately address and prioritise the natural values of the wider peninsula area
5. No new jetty in front of the Hazards

Many members of the Tasmanian public are already avoiding Freycinet Peninsula (especially at peak periods) and in the community there is a widely expressed view that the Tasmanian government is more focused on the interests of tourists than on the interests of local Tasmanians.

The Parks and Wildlife Service (the PWS)

Under the T21 Strategy framework, Parks 21, (which is the Joint Strategic Action Plan between the PWS and Tourism Industry Council of Tasmania), the PWS is obliged by the State Government to facilitate tourism ventures on the peninsula (as well as in other national parks and reserves in Tasmania).

This diverts the agency, and its resources, away from its core responsibility of managing the Freycinet National Park for protection of its natural and cultural values.

The Management Plan for the Freycinet National Park and other reserves in the area is the guiding document that the PWS uses to carry out its legislated management responsibilities. However the Management Plan is nearly 20 years old and the State Government has no plans for reviewing it.

In the TNPA’s view, it is revision of the statutory **Management** Plan for Freycinet National Park that is required, rather than the tourist industry-driven **Master** Plan process.

Protection of the natural and cultural values of the National Park and other reserves on the peninsula needs to be the number one planning priority.

In the TNPA’s view, the Master Plan process needs to be halted and sufficient funding provided to the PWS so that the PWS can engage planners expert in the conservation of natural and cultural values (or to enable the PWS to deploy such planners who are already employed as staff members).

As an urgent priority such expert planners must examine and propose strategies to cap visitor numbers to Freycinet National Park.

Protecting the values of the Freycinet National Park

The DFMP#2 acknowledges that “Any new infrastructure can directly affect these [ecological] values, as can increased or geographically expanded visitation ...” (DFMP#2, p.62)

“In planning new infrastructure for the area, as well as managing visitor impacts, these values must be considered, investigated, and impacts on them avoided where possible.”(DFMP#2 p.62).

However the DFMP#2 will play no part in protecting Park values and the TNPA doubts that the PWS is in a position to ‘consider, investigate’ and act on threats to ecological values. The agency is sorely under-resourced to carry out scientific work, especially, since becoming a party to the Parks 21 MOU, it has been diverted into serving the interests of the tourism industry.

If the State Government was serious about assisting the PWS in its primary role of protecting the values of the Freycinet National Park, it would initiate a review of the **Management Plan** (with a focus on protection of natural and cultural values).

Privatisation of public land

The DFMP#2 states: “During development of the master plan high level consideration was given to publicly-owned land areas for possible future accommodation” (DFMP#2 p.114).

Included in these public lands considered for takeover (i.e. for privatisation) are the Coles Bay Conservation Area and Public Reserve. These areas must remain as public land – they were reserved for good reason.

The TNPA is opposed to any privatisation of public land on the peninsula.

There is **private** land available on the peninsula – it is outrageous to expect the Tasmanian public to offer up their conservation and recreational areas in order to facilitate private commercial developments!

Lack of open tender

The DFMP#2 states that developments associated with the master plan will be by targeted invitation from the Tasmanian Government. The TNPA considers this inappropriate! All developments must be advertised by open tender.

Jobs and growth

The DFMP#2 labours the point that it will bring jobs and prosperity to the area. However this false promise hides the fact that employment in tourism is largely seasonal, insecure, casual and part time. The Australian Taxation Office recently released data showing that over 80% of people working in the tourism sector earn less than the median Australian wage and 32% live below the poverty line.

Water supply

Reliable water supply is already an issue for the peninsula and the long-term trend is for the region to get drier. Therefore, contrary to what is proposed in the DFMP#2, there should be no consideration of more visitor accommodation on the peninsula until there is certainty of adequate water supply, long-term. There is plenty of scope for visitor accommodation **off** the peninsula e.g. in the Bicheno area.

Wastewater

Taswater is putting a large amount of money into a feasibility study for a new wastewater scheme for Coles Bay.

The DFMP#2 states that “The timing of the implementation of many of the priority projects will be dependent on the implementation of the recommendations arising from the sewage and wastewater feasibility study.” (DFMP#2 p.xiii)

The decision about whether or not to adopt a new and expensive wastewater scheme must be made by the local community. Most residents wish to retain the village feel of Coles Bay and would not welcome a change in the density and extent of development on the peninsula that would be facilitated by a new wastewater scheme. A new scheme would also result in considerable cost to homeowners.

The TNPA supports Motion 2 from the community meeting held at Coles Bay on 22 April 2019, which states: *Glamorgan Spring Bay Council to do an environmental audit of Coles Bay township and the management of wastewater (particularly commercial operators such as AirBnB).*

Bushfire risk

The DFMP#2 states that “the bushfire risk must be considered when managing any developments on the peninsula in the future” (DFMP#2 p.62) but takes no responsibility for doing anything about this.

Bushfires pose a serious risk for the peninsula and surrounds and this risk is heightened with climate change, as illustrated by the very recent unseasonal bushfire emergency at Dolphin Sands (10 - 11 April 2019). An updated Freycinet National Park **Management** Plan would certainly have to address this heightened bushfire risk. The DFMP#2, on the other hand, takes no responsibility for public safety, including managing bushfire risk. It is assumed that public agencies, such as the Tasmanian Fire Service and the Parks and Wildlife Service, will take responsibility for this and that the Tasmanian public will foot the bill.

Conclusion

The TNPA rejects the prime aim of the DFMP#2, which is to increase tourism numbers and spending on the Freycinet Peninsula, as posing a threat to the ecological values of the area as well as being against the interests of the Tasmanian people, including the Coles Bay community – and as being detrimental to the quality of the visitor experience. The DFMP#2 needs to be shelved until the carrying capacity of the peninsula has been established (by independent experts) and a revised Freycinet National Park Management Plan is in place.