

## SUBMISSION

### WELLINGTON PARK DRAFT VISITOR AND RECREATION STRATEGY

The Tasmanian National Parks Association Incorporated (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. The TNPA has a history of attempting to engage with both the Hobart City Council (HCC) and the Wellington Park Management Trust (WPMT) on the management of Wellington Park including participation as a stakeholder group in the consultation which contributed to the development of this strategy. 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.

The TNPA is generally supportive of the approach proposed in the Draft Visitor and Recreation Strategy.

Our greatest concern is the low priority given to management of visitor numbers (see comment 3 below) and the related development of a strategy for the use of the Pinnacle Road (Actions 5.1 & 6.2: 5 years). It is widely acknowledged that, at peak periods (excluding snow conditions when the road is actively managed by HCC), driving along the road is not a good experience for visitors; traffic volumes are too high and parking is inadequate. Visitor numbers are rapidly returning to pre-Covid levels and the management of access is fundamental to many of the other strategies (e.g. walking, cycling, commercial use) proposed in the draft strategy. This needs to be addressed urgently.

For a decade or more the cable car proposal has been presented as "the solution" to these issues. This has made rational public debate on a strategy for the use of the Pinnacle Road almost impossible; it is important to seize the opportunity provided by the recent rejection of the cable car proposal to progress planning while there is no active proposal to complicate debate.

The most obvious transportation option is an expanded shuttle bus service in conjunction with a carpark and, possibly, visitor centre at Halls Saddle, and restrictions on private vehicle access at peak periods, but all alternatives should be considered.

We also provide the following specific comments on the draft strategy:

1. Front cover: the image depicts an activity which is both dangerous and illegal (cycling on the wrong side of a public road).
2. Page 4: Acknowledgement of Traditional Custodians. Despite a comprehensive acknowledgement of the Tasmanian Aboriginal People as the traditional custodians of the land in Wellington Park, the Draft Visitor and Recreation Strategy does not appear to include any initiatives to actively engage the Tasmanian Aboriginal Community in the management of kunanyi.

3. Page 7: point 3, Dispersal of Visitors. This (and text on page 31) acknowledges the need to “reduce peak loads at high-pressure sites, including The Pinnacle and The Springs” but only in the context of “the opportunity to disperse visitation across the Park”. The Draft Visitor and Recreation Strategy fails to acknowledge, let alone address the “elephant in the room”, the possibility that Wellington Park already has a major overuse problem at some times and locations which is seriously detracting from the experience of visitors. This needs to be addressed directly including the possibility of actively limiting the number of visitors allowed in a particular location at a particular time. The proposed shuttle bus service in conjunction with restrictions on private vehicle access at peak periods would probably be enough to achieve this.
4. Page 10: Actions 1.1 & 1.2 “Engage with tourism agencies to include Wellington Park as an iconic offering”. In the opinion of many Wellington Park already has a major overuse problem (see above). The TNPA questions the rationale for encouraging any additional use, at least until additional strategies for visitor management are implemented.
5. Page 10: Action 2.6 “Refine the Management Plan zoning to ensure a more seamless visitor/user experience”. The 2015 amendment to the Pinnacle Specific Area extended it beyond the highly modified area of carpark, buildings and communication facilities to include the relatively undisturbed proposed location of the cable car upper terminus and associated commercial facilities. The Pinnacle Specific Area should revert to its original boundary.
6. Page 10: Action 2.6 “... ensure that incompatible uses are kept separate and/or infrastructure appropriately designed to minimise risks”. The TNPA supports this action but notes that we have previously raised concerns with the HCC <https://tnpa.org.au/kunanyi-mtb-tracks-example-of-a-planning-failure/> regarding particularly the adequacy of the consultation in (and, hence the conclusions of) the *Shared Use* survey which informed *Riding the Mountain*. Some of the proposals contained therein are likely to worsen user conflict.
7. Page 12: Action 7.1 “Build a visitor group reference panel that represents visitor groups engaging with the Park ...”. The TNPA supports the concept of a reference panel but considers that membership needs to be broader than just visitor groups. It should include conservation groups such as TNPA, Birds Tasmania and Field Naturalists.  
The concept of some sort of consultative committee (on which TNPA would be represented) has been suggested more than once by representatives of HCC/WPMT during meetings between the TNPA and but nothing has ever eventuated.
8. Page 16: 2032 vision:
  - a. “Tracks are reliably and consistently classified in terms of use, degree of difficulty, length and quality”. The tracks should not just be appropriately classified by 2032 but should be actually built/repared and maintained at said standard by then. The track classification needs to acknowledge the Recreational Opportunity Spectrum; the principle that a range of tracks of different standards is required to provide a range of user experiences. Far too much recent track work has consisted of the unnecessary and undesirable upgrading of tracks to a uniformly high standard.
  - b. “Beautifully designed and connected hubs focus visitor activity. High use areas are masterplanned to inspire and connect visitors to the Park,

providing a seamless experience. These provide a transport nucleus, toilets, information, food and beverage and possibly commercial operators". It should not be assumed that food and beverage and commercial operators are appropriate in all hubs, especially those within the park.

9. Pages 19-30: The TNPA welcomes the analysis attempted in "Understanding Our Visitors" particularly its emphasis on the importance of "being surrounded by nature" but is concerned that it is somewhat flawed and simplistic.

It is reported on page 20 that the research underpinning this strategy found that 'appreciating the views' and 'taking in nature' are the most often cited reason for people wanting to visit Wellington Park. It is unfortunate that these two potentially conflicting motivations were combined in one question since it obscures the fundamental management dilemma: is The Mountain visited because it is a wonderful natural area or because it is a place which provides a spectacular view of the city, or some combination of the two? The opportunity to explore the full spectrum of motivations<sup>1</sup> was missed.

Likewise, there is little analysis of the implications of the importance of "being surrounded by nature". It is likely that this is the major motivation for most bushwalkers, whereas for many mountain bikers it is likely that "being surrounded by nature" is merely a pleasant backdrop to an exciting ride.

#### Other comments:

1. It would avoid confusion if the page numbers in the pdf coincided with the numbers printed on the page (page references in this submission are to the printed numbers) and it would assist readers if the table of contents contained live links to the relevant page.
2. The *Wellington Park Act 1993* indicates (in section 5) that "the provision of recreational and tourism uses and opportunities" is to be consistent with the other purposes of reservation (i.e. "the preservation or protection of the fauna or flora contained in or on the land; ... the preservation or protection of the natural beauty of the land or of any features of the land of natural beauty or scenic interest; ... the preservation or protection of any features of the land being features of historical, Aboriginal, archaeological, scientific, architectural or geomorphological interest; [and] ... the protection of the water catchment values of the land"). It therefore seems inappropriate for the strategy to give priority for various actions to develop and monitor visitation and commercial use (proposed to be done over 2 years) over development of "a comprehensive and reliable methodology to baseline and track Park values" (proposed to be done over 5 years).
3. Responsibility for management: the Draft Visitor and Recreation Strategy does not always make it clear which of the Hobart City Council and the Wellington Park Management Trust is responsible for the implementation of

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<sup>1</sup> Some visitors are oblivious to the natural values of The Pinnacle. For them it is simply a place which provides a good view of the city and river. Exposure to the weather is a nuisance and they would prefer to enjoy the view from indoors while sipping a coffee.

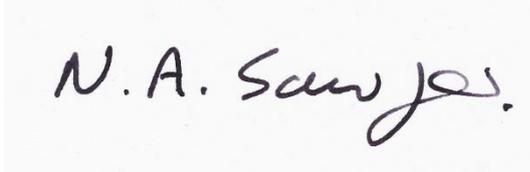
Others visit The Pinnacle solely to enjoy the alpine plateau. For them there are already too many people and facilities and the last thing they want is additional development.

These divergent values are fundamental to understanding the polarisation of attitudes to the now defunct cable car proposal. Most visitors probably lie on a continuum between these two extremes. A greater understanding of their attitudes would inform many aspects of management.

which aspects of the strategy, and which issues are, of necessity, managed jointly.

At a broader level the TNPA would like to see a review of the management arrangements for Wellington Park with a view to consolidating all important responsibilities (e.g. planning, operational management, funding) in a single agency (we acknowledge that this is far beyond the scope of this strategy).

The TNPA would welcome an opportunity to discuss this submission in person.

A handwritten signature in black ink on a light-colored background. The signature reads "N. A. Sawyer." with a period at the end. The letters are cursive and fluid.

Nicholas Sawyer  
President, TNPA  
28 January 2023