

Draft 2008 Tasman National Park Management Plan – TNPA Comment (Feb 2008)

The TNPA's key concerns with the *Draft 2008 Tasman National Park and Reserves Management Plan* are those changes which facilitate the development of the proposed Three Capes Walk as the TNPA is opposed to the proposed walk in its current form.

The TNPA notes the management intent for the Tasman National Park and Reserves as stated in the *Tasman National Parks and Reserves Management Plan 2001* (Summary, piii) –

The park and reserves will be managed to protect their outstanding natural and cultural values, and provide for a range of recreational opportunities, including beach walking, camping, hang gliding and bushwalking. Facilities will be developed in areas of high visitor numbers and will complement the natural and cultural landscape. And, included in the major management initiatives for the park and reserves are the following – upgrade and promote the Tasman Coastal Track and associated infrastructure; and facilitate appropriate commercial tourism development within the Fortescue Bay Visitor Services Zone and encourage tourism development associated with park visitation elsewhere on the peninsula.

The proposed Three Capes Walk is not in keeping with this stated management intent at a number of levels. In addition, it is noted that the *Tasman National Parks and Reserves Management Plan 2001* was developed through extensive community and other stakeholder consultation and generally accepted as providing appropriate management for the park and reserves, but this has not been the case with the proposed Three Capes Walk (which is being imposed from the top down and has to date failed to include a formal opportunity for public comment). Given this, the TNPA argues that changes to the management and use of the Tasman National Park and reserves must be based on sound assessment and extensive, genuine public consultation, and this must precede alterations to the statutory plan of management.

The TNPA therefore submits that the proposed Three Capes Walk is not in keeping with the 2001 management plan and that the changes being advocated in the 2008 draft plan in relation to this proposed new development have not been sufficiently justified to warrant changes to provide for the proposed walk in the 2008 draft plan (refer pages 1 and 2 of the 2008 draft plan).

The TNPA therefore objects to the following 2008 draft plan proposed amendments - plan references – p iii, Summary, pt 3; p iii, Summary, new pt; p iii, Summary, pt 5; p iii, Summary, pt 6; p1, 2.1.1, The Vision ..; p10, map 2, Management Areas; p14, Table 1, Recreation Zone Description – both items; p31, Fire management, col 2, Action 21; p34, 4.2.3, *Phytophthora cinnamomi*, col 1, para 1; p34, 4.2.3, *Phytophthora cinnamomi*, col 1, policies; p34, 4.2.3, *Phytophthora cinnamomi*, col 1, policy 4; p36, 4.4, Managing Visitor Impacts, policy 6; p36, 4.4, Managing Visitor Impacts, Action 1; p37, 4.5 Managing Development Works; p39, 5.2 Promoting the Park & Reserves, paras 1-6; p42, 5.4.1, Boating, col 1; p42, 5.4.1, Boating Actions; p42, 5.4.1, Air; p42, 5.4.2, Air; p43, 5.4.3, Vehicles, col 2; p44, 5.4.3, Vehicles, action 6; p44, 5.4.4 Walking Tracks; p52, Tasman National Park, col 2; p55, 5.5.3, Remarkable Cave Visitor Services Site; p57, 5.5.5 Recreation Zone; p57, 5.5.5, Recreation Zone, policy 8; p57, 5.5., Recreation Zone, policy 9; p89, Appendix 5;

More specifically, the TNPA is opposed to the current Three Capes Walk proposal for the following key reasons –

1 *Scale and extent not in keeping with conservation objectives of national parks*

We note that a National Park is reserved for "The protection and maintenance of the natural and cultural values of the area of land while providing for ecologically sustainable recreation consistent with conserving those values" (*Nature Conservation Act 2002*, Schedule 1). The extensive new development required by the proposed Three Capes Walk with its five overnight 'nodes' that far exceeds any other overnight accommodation facility in a Tasmanian national park outside a Visitor Services Zone cannot be considered 'ecologically sustainable recreation consistent with conserving ... values', hence is not in keeping with the management objectives of a national park, nor are they in keeping with the management intent of the Tasman National Park (see above). We argue that the large extent of the development (which runs through most of the Tasman National Park creating a recreation zone throughout this area, including in sensitive coastal areas) will compromise the integrity of the park.

In addition, since the environmental impact assessment has not been completed (even though phytophthora spread has been identified as a significant risk) the proposed walk cannot be argued to be consistent with the protection and maintenance of the natural values. The management plan should therefore not be amended to allow for the proposed Three Capes Walk. No plan amendment should be undertaken to provide for the walk unless the walk can be clearly demonstrated to be in keeping with objectives for national park management.

2 *Location and size of 'overnight nodes'*

At this stage the only information that is available on what is proposed for these 'nodes' is an 'indicative sketch' in the 2007 Feasibility Study (p29). This indicates that each node will comprise 1. an independent walker hut to accommodate 60 people with small bunk rooms for 2 people (the number of these is not specified) and a fully equipped kitchen and area for socialising and reading; 2. a commercial hut (c.12-16 people, noted as potential); 3. one hut host/ranger accommodation; 4. two sets of toilets and washrooms; 5. one unidentified building; 6. one helipad and 7. a network of connecting tracks and scenic/viewpoint access tracks.

Not only is there no firm proposal for what is envisaged, but as noted above the five overnight 'nodes' are considerably larger than any other overnight accommodation facility in a Tasmanian national park outside a Visitor Services Zone. These are not 'overnight nodes, they are small villages, and far exceed the infrastructure at the regular stops on the Overland Track (which the PWS argues the Three Capes Walk is modelled on), including at Pelion Plains.

In our view this is an unacceptably major infrastructure development for remote, natural area zones of this (and any other national park). In addition, the construction, management, servicing and monitoring of these zones will also have high costs, significant impacts and associated risks, and will require maintenance of access tracks and/or regular helicopter overflights which are additional impacts not explored in the 2007 Feasibility Study or clearly articulated in the 2008 draft plan.

The TNPA also has serious concerns about the proposed locations of the 'nodes' –

- no attempt has been made to site these large visitor infrastructure developments in existing Visitor Services Zones (eg, Fortescue Bay) or outside the Park (eg, Port Arthur instead of Surveyors Cove, or on private property in the case of the Maingnon Creek and Shipstern Bluff sites) which would be much more environmentally sensitive and cost effective;
- none of the proposed locations are particularly suitable sites for such large developments, in particular they have limited flat areas and water availability is an issue and potentially requires utilising local water sources (see below); and

- all node sites except for the Surveyors Cove site are located in (or on the edge of) high and variable *Phytophthora* vulnerability zones and in *Phytophthora* management zones (see also below).

The 'node' locations therefore all have significant environmental risks associated.

3 *Water availability*

Water availability as noted in the 2007 Feasibility Study is a significant issue with the numbers of walkers being anticipated and promoted since water is not plentiful in this area yet water demand will be high yet. Low numbers of walkers can be accommodated without infrastructure provision or major affect on the catchment and riparian zones, however it is questionable if the number of walkers being promoted for the proposed Three Capes Walk is sustainable – indeed the 2007 Feasibility Study (p30) analysis suggests that sustainable water supply may be an issue, and that the need to supply water is driving the large building footprint (for roof rainwater catchment), and even with this supply there may need to be use of local creek water. This possibility (what is involves and the impacts) is not discussed, nor are constraints on water use such as prohibiting showers for walkers, including commercial groups, or what happens if the 2007 Feasibility Study projections are not met due to changing local rainfalls (which is likely in the short term given the recent changes that have been occurring which have been associated with global warming). This appears therefore to be a significant environmental and economic risk that at present has not been adequately addressed.

4 *Phytophthora risk*

The most significant single environmental issue with the proposed Three Capes Walk is the risk of *Phytophthora cinnamomi* spread. This is acknowledged as significant risk in the 2007 Feasibility Study (p34-36) which notes that the key to preventing phytophthora spread is prevention. The track however will pass through areas of high and variable phytophthora vulnerability which are located in phytophthora management zones (where risks of spread occur and require management). Given this, the principles for prevention appear to be of questionable efficacy: Avoiding wet areas and keeping the track mud free – may be achievable. There are some areas (Remarkable Cave to Shipstern Bluff) where it is unlikely that the track can be rerouted into forest, the other major principle for mitigation. And, it is not clear that the tracks and nodes, given the number of walkers and the location, will be able to adhere to the phytophthora management guidelines (not yet prepared). The TNPA is therefore opposed to significantly increasing the numbers of walkers in the southern coastal sections of the proposed track, and in particular in as yet untracked sections west of Port Arthur.

5 *Issues with boat sections*

The Feasibility Study (pp 21 and 23) notes that "a viable boat service will be critical to the success of the proposed start" and the Port Arthur crossing will need to be an "integral and seamless part of the Three Capes Track", yet there is no detail in the 2007 Feasibility Study on how the boat sections will operate and what infrastructure will be required.

The TNPA has several concerns in relation to this aspect of the proposed Three Capes Walk. These include –

- the reliance on boat based sections, as in spite of the analysis of boat use and weather in the 2007 Feasibility Study there will be a significant number of days when the seas will be too rough to safely and comfortably travel one or both of the sections of water that require boat travel (particularly if small boats/kayaks are used as suggested to the TNPA by the PWS), yet no provision has been made in this case and it is unclear what other alternative is possible (except possibly a prohibitively expensive helicopter shuttle?);
- the boat based sections are proposed to be private sector commercial operations, yet there are no existing commercial operators who can take on these sections

and the commercial viability has not been assessed (and the Maria Island experience does not give confidence that a regular, seamless and affordable boat service is achievable);

- the cost of these commercial, and in one case essential, boat based sections is not costed into the cost of the proposed walk, yet is a significant additional user cost;
- that additional significant infrastructure will be required for the boat sections, particularly at Denmans Cove, but this is not resolved and likely options are not discussed;
- it is likely that non-Three Capes Track walkers and boat users will use new coastal infrastructure, yet potential conflicts of this nature have not been assessed or policy developed to deal with this issue.

6 *Impact on current walking opportunities, user equity & potential conflicts*

Both the 2007 Feasibility Study and the 2008 Draft Management Plan have little to say on how the proposed Three Capes Walk will affect day use and current overnight use of the walking tracks in the park or on potential conflicts of use. This is a real issue as the proposed walk uses existing regularly used tracks for both day and overnight walks, and the new proposed infrastructure will potentially attract other users. The 2007 Feasibility Study (p28) notes that the proposed Three Capes Walk "will be a tent free experience" and the costings do not include a lower fee for non-hut based use, it suggests that the only overnight use will be for full walk fee paying 'clients'. Also, although the 2007 Feasibility Study (p23) notes that there is a relatively high amount of day use, the only section of Three Capes Walk track that will be clearly maintained as a free access day use walk is the Fortescue Bay to Cape Hauy track.

The TNPA have several concerns in relation to this aspect of the proposal—

- current users will be disenfranchised (note – yet a number of the tracks which will become commercial only have been established and maintained at least in part by the Hobart Walking Club for community use and/or established and promoted by other community members);
- the promotion of the range of day use walks in the Tasman National Park in particular has the highest potential of any land based walks to provide a sustainable visitor use of the park which will also bring significant benefit to the Tasman Peninsula community, as this type of use will use local (out-of-park) accommodation and food outlets. The current proposal however puts this type of use at risk (there is no guarantee of continuation, there are potential conflicts associated with too many users of a single track and there are water availability issues);
- the high cost of the proposed walk will deter many middle and lower income earners from doing the walk and these walkers will be relegated to the less popular and less scenic walks in the park, thus promoting inequitable use of the park;
- if current and potential users cannot afford or do not want to do this type of walk, they will go elsewhere, thus putting more pressure on other parks;
- and at the same time it is likely that the new infrastructure will attract more day walkers, increased boat use to coastal access points, potentially creating even more unsustainable use at some 'nodes' and conflicting uses.

The above outcomes are in the TNPA's view not appropriate and need stringent assessment as part of the assessment of the feasibility and impacts of the proposed Three Capes Walk.

7 *Commercial operation of the walk*

The 2007 Feasibility Study promotes the proposed Three Capes Walk as a commercial opportunity to be run by a PWS Business Enterprise, however there is no clear commitment to this type of management in the long term and there is no

mention of how the walk will be managed in the long term. The TNPA is concerned that once set up this enterprise may be handed over to a private sector business.

Prior experience with businesses in Tasmanian parks has shown that private sector businesses –

- require regular monitoring and servicing by the PWS (not costed into the proposal);
- raise prices for profitability (which will make the walk increasingly less affordable and less equitable) (and to date no pricing policy to control this has been established by government for any such venture);
- make ongoing demands to expand facilities (eg, Cynthia Bay and Cradle Huts);
- have commercial-in-confidence leases which mean that the public are denied access to the conditions of the leases, which are in fact public management issues since parks are part of the public estate; and
- they on-sell leases, thereby resulting in parks losing additional control.

In the TNPA's view this situation is highly undesirable. None of these issues have been addressed as yet in relation to the proposed Three Capes Walk, but this is critical as part of the proposal assessment

The TNPA is also concerned about the lack of discussion about the use of the track by commercial groups. The costing makes it clear that there is an allowance for commercial groups to use the proposed Three Capes Walk, yet how this commercial use is to operate and be managed is not made clear and there are conflicting messages. This is reflected in the inclusion of a "potential commercial hut" in the indicative node sketch (2007 Feasibility Study, p29), but there is no discussion of size, capacity or what it would include in the accompanying discussion. The TNPA also has the same concerns for this type of commercial operation as noted above in relation to the possible running of the full proposed Three Capes Walk on a private sector commercial basis.

8 *The economics of the proposed track*

The TNPA is concerned about the proposed cost of the walk. We recognise that there are significant costs to establishing a walk of this nature, but argue that the cost will be prohibitive to many potential users and will deter other potential users, while a less 'developed' style of walk would attract a greater range and number of people to the walk and would be more equitable.

The TNPA is also concerned with the overall cost of the proposal to the taxpayer. The costing set out in the 2007 *Feasibility Study* indicates that there will be a cost of \$12.5-15.5 million to establish the walk infrastructure and facilities which will not be recovered because the fees from the walk will only just pay for the ongoing operating and maintenance costs. This means that the initial set-up cost of \$15-18 million is an out-of pocket cost that will be borne by the Tasmanian taxpayer. We question this level of expenditure on the proposed walk by a government who has difficulty in funding the ongoing management of its parks and reserves (for example less than a year ago the government argued that they could not afford to fund the \$15 million Rabbit and Rat Eradication Plan for Macquarie Island) and argue that this money could be used on much more worthwhile programs.

The TNPA's review of the costing suggests that the establishment cost of \$12.5-15.5 million is also likely to be a minimum cost and that the need to use helicopters for transferring materials (and possibly personnel) may result in higher than predicted costs. The recent experience of the track construction at Freycinet (the Wineglass Bay lookout loop track) also suggests that the quality of track construction required for the proposed Three Capes Walk may also result in higher track construction costs than allowed for in the Feasibility Study because of the time consuming nature of this high quality, manual infrastructure. It is also questionable as to whether the use will grow as quickly as predicted in the 2007 Feasibility Study, and this also has cost recovery implications.

9 *Lack of demonstrated economic benefit to the Tasman Peninsula*

The proposed Three Capes Walk has been promoted as having significant spin-off benefits for the Tasman Peninsula. The TNPA believes that the stated benefits are significantly overstated or are not well substantiated. The 2007 Feasibility Study (p30) claims that the Three Capes Walk has the potential to generate –

- An additional 50,000 bed night per annum on the Tasman Peninsula - this however is bed nights on the walk which will only pay to maintain the walk and will not generate additional economic benefit to the Tasman Peninsula;
- 35 direct new jobs – this is not support or justified in the 2007 Feasibility Study and the TNPA's analysis of the proposal suggests that as few as 4-8 new local jobs only may be generated (staffing the walk starting point and operating boat based sections) with other employment being for trained track workers and parks staff hence not being guaranteed to locals – this level of local employment could be generated by less 'developed' alternatives through track maintenance.
- \$18.6 million in visitor expenditure per annum – which is based on the average expenditure of an Overland Track walker during their stay in Tasmania. Given the nature and location of the proposed Three Capes Walk and the proximity of the walk to Hobart, then it is likely that only a very small proportion of this expenditure will be spent on the Tasman Peninsula, with walkers spending little more than the cost of refreshments at the start and end of the walk, preferring instead to base the rest of their stay in Hobart or visit other parts of the State. The analysis also fails to take into account whether the pattern of spending will change when there are two fee based walks in Tasmania. It should also be noted that the figures that the 2007 Feasibility Study (p8) uses shows that day users of the Overland Track spent significantly more money while in Tasmania, which this is more likely to be outside the park.

The TNPA also objects to the process that is being undertaken for developing, assessing and approving the proposed Three Capes Walk. In particular –

- The lack of consultation with stakeholders and community on alternatives to the current proposed Three Capes Walk.
- The lack of community consultation opportunity on the 2007 Three Capes Walk Feasibility Study (ie, no invitation for public comment and, in the TNPA's experience a lack of interest in genuine comment, including alternative options).
- The only formal opportunity for formal input is the management plan amendment public comment opportunity (a statutory obligation) which is in the TNPA's view too late to be able to have any substantive input regarding the proposal, as by this stage the proposal has been significantly established.
- The amending of a statutory plan of management for a development proposal that has not been fully assessed or finalised at this stage (numerous unresolved issues which are not adequately provided for in the 2008 draft plan include the environmental impacts, the exact location of the track(s), the exact nature of nodes, the nature of infrastructure required for the boat crossings, how walkers get from Port Arthur to Remarkable Cove as part of the walk; the full cost of the walk; commercial interests in the walk, use and access constraints on the different tracks which will comprise the Three Capes Track) – some of these matters may be unmanageable or may require substantive amendments to the proposed walk, hence may require significant new amendments to the management plan (eg, in relation to track location hence the location of the Recreation Zone).
- The *Draft Management Plan 2008 Draft Management Plan 2008* omits information about the proposed Three Capes Walk which is critical in understanding the nature of the proposal and its impact on the natural and cultural values of the park. For example there is no indication that the proposed walk will involve five 'overnight nodes' nor is their scale and location mentioned. This information should be included in replacement Map 2 and the figure on page 47.

- The presentation of the amendments as a set of out of context proposed amendments in the 'Draft Management Plan 2008' document. The lack of plan context makes it difficult to assess the proposed changes, the lack explanation about the proposed changes (saying something is 'redundant' is not an explanation) makes it impossible to assess some proposed changes, and the need and justification for the proposed Three Capes Walk should be integrated into the plan in the discussion about recreational opportunities and issues (ie, in Section 5.4.4). The TNPA also objects to the document on which comment is invited being titled *Draft Management Plan 2008* since it is merely a list of proposed changes and not a plan of management.

The above constitutes poor project management and planning practice and falls very far short of genuine stakeholder and community consultation. In the TNPA's view, such a process lacks openness and transparency and is likely to unnecessarily engender community mistrust of the PWS, which is undesirable and an issue that the PWS should be trying to redress.

In the TNPA's view a number of the above issues could be addressed and still allow for a Great Walk in the Tasman National Park by further developing the Tasman Coastal Trail which would create a c. 4 day walk by predominantly using existing tracks, existing visitor services sites, and existing access. Current and additional overnight camping facilities could be provided as tent platform based sites to minimise environmental degradation. This alternative avoids significant new environmental impacts, avoids new high risk phytophthora locations, avoids conflicts with existing users, promotes day use walks and hence promotes overnight stays and other visitor spending on the Tasman Peninsula outside the Park. This option can be implemented in a relatively short time frame and at much less cost to the taxpayer, and it potentially allows for limited, environmentally and economically sound extension to the overnight track network on a needs basis in the future.

Given the above, the TNPA strongly recommends that the government defer the amendments to the 2001 plan, or at minimum those that relate to the proposed Three Capes Walk, until the Three Capes Walk proposal is finalised and where necessary modified to ensure that it is environmentally, economically and socially acceptable.

In this context the TNPA also recommends that the government consider as an alternative to the Three Capes Walk the scaled down but more environmentally friendly, user friendly and low cost alternative of the *Tasman Coastal Trail*. This is a 'Great Walk' option that was originally considered and supported by government and generally supported by the public and deserves consideration.

Specific comments on the proposed amendments are provided in the table attached. These include comment on some proposed changes not directly related to the proposed Three Capes Walk.

[draft, 24/2/2008]