

22 July 2018

Director of National Parks and Wildlife
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Comment on Draft Freycinet Master Plan 2018

Launched in September 2001, the 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.

Stakeholders

The TNPA acknowledges that some consultation with the Tasmanian public occurred PRIOR to the drafting of the Draft Freycinet Master Plan (henceforth referred to as the DFMP). However the list of 'stakeholders' (second page of DFMP) is dominated by tourism/development interests; it should be much more inclusive. Not only has Freycinet Peninsula been a much-loved destination for generations of Tasmanians (not just those who have shacks on the peninsula) but many also take an active interest in the protection of the natural and cultural values of the national park. Environmental organisations and user groups need to be included as 'stakeholders'.

Relationship between Master Plan and statutory management plan

The DFMP makes remarkably little reference to the statutory management plan and no attempt to explain the relationship between the two documents. The TNPA considers it reasonable to prepare a separate planning document to deal with issues (such as the proposed shuttle bus) which straddle the park boundary but is concerned that this is the start of a trend to replace statutory management plans with other documents which are not legally enforceable and not subject to prescribed standards for public input. The current management plan dates back to the year 2000, long before the huge influx in visitor numbers of recent years posed new challenges for the Park managers. It is in urgent need of review.

Introduction

- The TNPA takes issue with the underlying aim of the DFMP, which is its use as "...a key tool for the Tasmanian Parks and Wildlife Service and industry to achieve the objectives of the government's Tasmania Visitor Economy Strategy 2015 – 2020..." (DFMP, p.i). This strategy aims to increase visitor numbers to Tasmania to an annual 1.5 million by 2021, regardless of whether or not the State can cope with these greatly increased numbers (DFMP p. 42). **Freycinet is already struggling with the impact of too many visitors.**
- While the DFMP looks at a variety of ways to manage increased visitor numbers, the TNPA is concerned that this is not just a crowding issue, the natural and cultural values of the Freycinet National Park will inevitably be further impacted by any increase in numbers – and notes that this is one of the major issues of concern for Tasmanians who took part in the community consultation:

"There was consensus that the Park was being used to such a degree that it was impacting upon the visitor experiences, and having environmental impacts on the natural values as well."

(DFMP, Appendix A, Consultation Report, Conclusion, p.107)

Protection of Freycinet's natural assets needs to be the priority of the Master Plan

- As the DFMP states: "The protection of these [natural and cultural values] must remain a keystone for the master plan and development of any kind, including infrastructure, must be sensitive to these values. They are the reason why the peninsula is a key visitor destination in Tasmania." (DFMP p.53).
- However the DFMP gives insufficient attention to the impacts of potential developments and increased visitor numbers on the natural and cultural values of the peninsula and National Park.
- The 2000 Freycinet National Park Management Plan, out of date though it may be, is still the only **statutory** document for the management of the Park and as such should be a key reference document for the DFMP.

Key Initiatives

The TNPA supports, in principle, a number of the Key Initiatives of the DFMP (and notes that some of these were proposed by participants in the community consultation process), including:

- Shifting the Visitor Centre (proposed as the 'Visitor Gateway Hub') and associated car park to a location before Coles Bay village
- The implementation of a shuttle bus system to reduce the number of vehicles in Coles Bay village and the national park
- A staged sewerage treatment system – locals have been calling for this for some time
- Entrance corridor

- The concept of Experience nodes – **with the exception of the one proposed for Moulting Lagoon** – see later in this document

The TNPA supports limiting commercial activity in the National Park south of the Hazards to its present level.

The TNPA also offers cautious support for a network of new shared use walking/cycling tracks, but this is conditional on walker safety being prioritised in their design (the TNPA is concerned that shared use threatens the safety of walkers unless measures to restrict the speed of cyclists are incorporated). The TNPA notes that current PWS policy is that cycling is prohibited on walking tracks and beaches in national parks; it is, however, permitted on roads, fire trails and 4WD tracks within most parks.

The TNPA's key concerns

The need for a cap on visitor numbers

This is urgent. Planning should start with consideration of the experience to be provided for visitors and the options available to achieve this. Serious consideration must be given to options beyond simply upgrading infrastructure to cope with ever increasing visitor numbers. The TNPA's preferred option would likely include a reduction in the numbers currently using the park's most popular locations at any one time (there are a range of options to achieve this, such as spreading the load over a longer part of the day). The DFMP includes a number of initiatives for better coping with the already excessive and increasing number of visitors to the peninsula. However most of these measures will not be in place in the short term and the TNPA is concerned that this will result in (and in many cases is already causing):

- Overcrowding
- Brand damage (as stated in the DFMP)
- Damage to the natural and cultural values of the national park
- Negative effects on the visitor experience
- Negative impacts on the amenity of Coles Bay village for local residents and shack-owners
- Locals (Tasmanians) avoiding what used to be a favourite holiday destination
- Even more demand being placed on the currently inadequate sewerage treatment system (the proposed new system is in stages and will not be fully operational for some years)

The TNPA notes that Tasmanian residents who took part in the community consultation process ahead of the drafting of the DFMP were very concerned about overcrowding and its impacts. The majority stated that **they did not want to see an increase in visitor numbers** (DFMP p.31).

Suggestions made by participants included: -

Look at restricting visitor numbers in peak periods to minimise impacts on the environment and amenity of the area.

Explore limits on visitor numbers to the park ...

Identify the carrying capacity of walks to address overcrowding.

Raise park fees or increase visitor-pays approaches (e.g. charge per person rather than per car) (DFMP, Appendix A, Consultation Report p.107)

Regardless of how much new infrastructure, and other measures proposed by the DFMP, are put in place, the peninsula has a finite capacity for absorbing visitors. There must be a cap on numbers and this needs to be established before, and not after, the Master Plan is implemented.

Helicopters, jet skis, and cruise boats

People who took part in the stakeholder consultation process were emphatic that they are opposed to all of the above intrusions on the tranquillity and naturalness of the peninsula and, in particular, the National Park.

The DFMP states (p. viii) that a study of the impacts of cruise ships and helicopter flights around the peninsula will be conducted in order to assess the impacts of these activities. The results of this study should be released for public information and there needs to be a moratorium on these activities while the study is taking place.

EOI projects “in the pipeline”

- The TNPA requests that there be no progression of EOI projects for the peninsula until the Master Plan is finalised, particularly as members of the public making comment on the DFMP have no access to information about these projects.
- The TNPA’s position is that that the PWS RAA process for all EOI projects proposed for the peninsula be made public and allow for public comment.

Adequate funding and resourcing of the Parks and Wildlife Service

- The Master Plan will only be effective in what it sets out to do if the park manager, i.e. the TPWS, is adequately funded and resourced in order to do its job effectively. This includes maintaining the existing role of the PWS in operating the Visitor Centre – it should not be privatised.
- This was emphasised by stakeholders in the community consultation process: “Increase the number and powers of Parks rangers and staff to address issues and patrol the park including checking passes, managing visitor impacts and environmental issues (not just managing traffic issues).” (Appendix A, Consultation Report, p.105)
- The Master Plan notes a lack of maintenance and poor condition of tracks and camp sites in the southern area. The under-resourcing of the PWS would no doubt be a contributing factor.

Many of the proposals in the DFMP will work only if the PWS is given considerably more resources than it currently has for monitoring and addressing impacts on the natural and cultural values of the park and for educating visitors on how to respect these values. Whilst the Discovery Ranger program is very successful, there is a need for additional track rangers to educate users and enforce appropriate behaviour in the more remote parts of the park.

Reserve Activity Assessments need to be made public

This point was also made in the community consultation process: “Make Reserve Activity Assessments (RAAs) public/advertised for public comment.” (DFMP p. 105)

The TNPA is particularly concerned that the public has no information about, or opportunity to comment on, EOI’s for the peninsula that have already been put forward – or may be put forward in the future.

Whereas the DFMP attempts to reassure the public that “all approvals are subject to the usual approval process including the Reserve Activity Assessment process administered by TPWS as well as the local planning permit process” (DFMP p.27) the TNPA wishes to point out that this reassurance is totally disingenuous. The RAA is a non-statutory, internal PWS process with no requirement for public notification or comment and no possibility for appeal or legal challenge.

It is normal for local councils automatically approve a proposal that has gone through the PWS RAA process.

So “the usual approval process” is totally opaque and the public is completely out of the loop.

The TNPA again states its position that all RAAs relating to any proposals in which the public is likely to have a strong interest, be made public and allow for public comment.

Moulting Lagoon

The DFMP includes proposals both for an ‘experience node’ at the side of Moulting Lagoon and a shared use (bicycle and pedestrian) track that follows the shore of the Lagoon from the experience node through to Coles Bay village and which is part of the proposed extensive network of new tracks on the peninsula.

Moulting Lagoon is an internationally listed (RAMSAR) wetland, meaning that it is scientifically recognised as significant bird habitat. It is not necessarily suitable to be developed as a tourist destination.

The TNPA recommends a thorough study of the impacts on the natural values of Moulting Lagoon prior to the development of either the track adjacent to the Lagoon or the ‘experience node’. These will clearly cause additional disturbance to the area (advice from BirdLife Tasmania is that wildlife is disturbed far more by bikes than by walkers alone). They have the potential to bring too many people (with the associated risk of accompanying dogs, even if this is not permitted) to an area where breeding birds in particular could be disturbed.

If it considered important to have a bike/walking track in this part of the peninsula it could be sited close to the road and well away from the Lagoon.

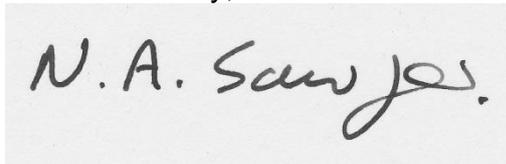
Likewise, an 'experience node' at Moulting Lagoon needs to be far enough away from the Lagoon itself so that there is no risk of disturbance to birds or temptation for people to make their way down to the lagoon edge – barriers would need to be more effective than those at the mutton bird rookery on the Bruny neck!

Any plans for allowing visitors access to Moulting Lagoon need to take into account the annual duck shoot.

No stated plans for monitoring and review of the DFMP

The DFMP is presented as a 10 year plan but it includes no provision for monitoring and review, which is essential and should be transparent.

Yours sincerely,

A rectangular area containing a handwritten signature in black ink that reads "N. A. Sawyer." The signature is written in a cursive style.

Nicholas Sawyer
President, TNPA