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Frenchmans Cap – Draft Recreation Zone Plan 2018

Background:

The Wilderness Society (TWS) has a long history of involvement in the Tasmanian Wilderness World Heritage Area, specifically its listing, extension, defence and management arrangements.

With regard to Frenchmans Cap and the surrounding area, our membership has strong attachment, often based on personal experience of visitation via bushwalking and/or Franklin River rafting trips. However, as acknowledged in the TWWHA Management Plan (TWWHAMP), natural values, including wilderness, have intrinsic value that are seen as important and this would underpin the interest of many in this area.

“The intrinsic value of wilderness was a key element in the advocacy for the protection and listing of the TWWHA. Its continuing integrity is therefore an important social value for many people. It is a central element in what many people value with respect to the TWWHA as a whole, and in effect it is often viewed as the principal value of the TWWHA.” (TWWHAMP pg. 174)

While this submission will detail a perspective with regard specific aspects of the Draft Recreation Zone Plan (the draft plan), of primary concern is the protection of Outstanding Universal Value (OUV), including wilderness.

Private commercial development and the protection of wilderness value:

Our key criticism revolves around the absolute absence of any discussion of the most imminent threat to wilderness in this region, a proposal to construct and operate private, commercial ‘standing camps’ within the recreation zone covered by this draft plan.

The Tasmanian Government’s Expression of Interest process for new tourism developments in national parks and reserves has approved, to the point of lease and licence negotiation, the proposal for a [Frenchmans Cap Walk](#). Based on the limited information on the public record, this proposal is to build at least two (possibly three) permanent ‘standing camps’ within the Frenchmans Cap Recreation Zone.

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The RiverFly 1864 application for a commercial luxury tourist accommodation in Walls of Jerusalem National Park features a 'standing camp' approved under the EOI process and now referred to the Federal Government for assessment under EPBC. This shows just what a misnomer the term 'standing camp' can be. In the RiverFly proposal, the 'standing camp' actually involves a permanently located 'hut' and multiple associated 'buildings' constructed of 'timber and steel'.

It beggars belief, given the approval of the Frenchmans Cap Walk in 2015 and the active lease/licence negotiations, that this draft plan does not countenance the Frenchmans Cap Walk development. There is no reference to its inevitable impact on values including wilderness, the amenity of existing recreational users, the proposed or potential locations, the numbers of additional visitors and other critical issues.

The draft plan goes to great length to detail refurbishment and upgrades to public infrastructure like huts, toilets and tent platforms (some of which were completed prior to the release of the draft plan) but makes no mention of private commercial infrastructure that was 'approved' over three years ago via a government-auspiced process.

This demonstrates either a profound inadequacy of this draft plan or the lack of any credibility of the EOI assessment process, or both.

TWS does not support the Frenchmans Cap Walk. We have identified and articulated concerns over a range of fundamental failures relating the TWWHAMP, particularly with regard to wilderness protection.

We note that the TWWHAMP maps parts of the Frenchmans Cap Recreation Zone as of high value wilderness value (14-18) and acknowledges that recreation zonation occurs in high-value wilderness areas.

"...a principle guiding the management of wilderness is that the whole area of the TWWHA has some wilderness value. For example, the Wilderness Zone is traversed in some areas by corridors of Recreation Zone or Self-Reliant Recreation Zone centered on significant tracks. These areas clearly have wilderness values..." TWWHAMP pg. 175

Given this, the clear requests of the World Heritage Committee to "protect the property's OUV, including its wilderness character" (2015 decision) and the unconditional acceptance of Government to do this, the publication of a Recreation Zone Plan that fails to countenance the impacts of an "approved" recreation zone development is of serious concern.

While existing track and public accommodation infrastructure have an observable impact on mapped wilderness values, the location of additional built private accommodation in the context of this existing infrastructure will determine the level of additional, or expanded impact on wilderness value.

The location of private commercial infrastructure will also have an impact in the experience and perceptions of other users and that of the prospective guests of the commercial operation.

These two issues may be mutually exclusive. On one hand, commercial guests using the private accommodation and independent walkers using the public huts will undoubtedly have a desire for 'separation' of respective accommodation precincts, largely based on visual and audio impacts. On the other, if the minimisation of impacts on wilderness values is to be prioritised, all accommodation infrastructure should be located in very close proximity.

Irrespective, space constraints, especially at Lake Tahune, may dictate the location of any proposed commercial accommodation and thus, the level of degradation of wilderness.

None of this is countenanced in the draft plan and this is a significant failure.

Specific issues:

1. Visitor experience statement

This section acknowledges that Frenchmans Cap *“is a precious place in landscape once vulnerable to development during the 1980s Gordon-below-Franklin Dam dispute”*.

This section should acknowledge the escalating dispute regarding development by way of remote, privately-owned tourism infrastructure and the vulnerability this creates.

2. Summary

We note and support the statement that *“as the Frenchmans Cap area becomes increasingly popular, preserving its wild character while maintaining the self-reliant visitor experience will involve careful planning”* however, TWS again raises the proposal for private, commercial tourist accommodation and the inconsistency with this statement.

Private commercial accommodation, even if ‘standing camps’:

- demonstrably threatens wild character;
- is not a “self-reliant visitor experience”;
- is not incorporated in this “10-year” Recreation Zone Plan and is thus not “planned”.

We support the management action that intends to maintain Frenchmans Cap’s position *“between the Overland Track and South Coast Track...as part of the recreational walking experiences within the TWWHA”*.

Noting however that the Overland Track has public and private accommodation, Frenchmans Cap has public accommodation only and the South Coast Track has no built accommodation (currently). Thus, the provision of private commercial accommodation at Frenchmans Cap runs counter to this management action.

3. Introduction

Overarching Vision and Objectives

TWS is highly critical of the TWWHAMP’s abandonment of the “overarching management objective” to “maintain or enhance wilderness quality” and notes the Tasmanian Planning Commission’s assessment that this issue was “inadequately addressed” in the Director’s Report and thus final TWWHAMP.

We note the paragraph in the draft plan pertaining to the *National Parks and Reserves Management Act 2002* lists only some of the objectives for management of national parks. Specifically, the objective for management of national parks to *“to preserve the natural, primitive and remote character of wilderness areas”* (j) has been omitted.

While we have already identified the fact that the specific protection of wilderness has been written out of the management objectives of the TWWHAMP, we submit it should be explicitly articulated in the Frenchmans Cap recreation Zone Plan as this plan relates in its entirety to the Franklin-Gordon Wild Rivers National Park.

Additionally, TWS notes the statement inside the front cover of the draft plan that references the Tasmanian Reserve Management Code of Practice 2003 and that the guiding principles and basic approach have been “adopted” in the recreation Zone Plan.

Given the Code of Practice is explicit with regard wilderness protection by containing a specific objective under “General Principles” to “minimise the effects on wilderness quality of disturbance from human activities within high quality wilderness areas” (pg 23), it is fair to say the draft plan breaches this principle.

The draft plan should prohibit build, commercial tourist accommodation across the Recreation Zone. Failing this, the plan should delete reference to compliance with the Tasmanian Reserve Management Code of Practice.

4. Current Situation

Scenic, wilderness and recreational values

We note the draft plan’s characterisation of the wilderness values of the region, specifically that *“while the track and huts have some negative influence (on wilderness), this 2005 (sic) mapping indicates most of the recreation zone remains high Wilderness Quality (wilderness values = 12 to 17 (sic))*

We believe that “2005 mapping” should read ‘2015 mapping’ and ‘17’ should read ‘18’.

Putting aside these potential errors, this statement reinforces the importance of Frenchmans Cap as an easily accessible wilderness area providing an important wilderness recreation experience. Similarly, it highlights the threat to wilderness of new visitor accommodation unless located in very close proximity to the existing huts.

Fire

TWS supports the maintenance of a fuel stove only declaration for this zone. Consideration should be given to replacing the Lake Vera hut heater with a non-combustible heater to reduce fire risk and servicing.

Commercial Use

TWS supports the availability of commercial tourism products within the TWWHA including the Frenchmans cap recreation Zone. It does not however support products that seek exclusive private access, would damage OUV, including wilderness values or impact negatively on the experience of existing users. This we do not support private tourist accommodation in the Recreation Zone and again recommend the Recreation Zone Plan prohibit it.

The draft plan identifies that uptake of existing commercial products to Frenchmans Cap is ‘relatively low to date’. TWS is concerned that the provision of private, commercial accommodation could change the visitor profile and lead to a rapid, unplanned increase in visitor

numbers. Given the draft plan already identifies that “trampling thresholds have been exceeded in some areas” and increase in visitation via the provision of private commercial accommodation is a concern. As the ‘standing camp’ proposal is not countenanced in this draft plan, it is fair to say the visitors it attracts would be unplanned.

TWS holds concerns over commercial scenic flights and does not believe the *Fly Neighbourly Advice* adequately protects wilderness values or the wilderness experience and amenity of other users.

Complaints from walkers should not be used as a measure of ‘reasonable acceptance’ of a particular activity.

Huts and shelters

The draft plan states that “there are currently no private huts on the track” but fails to discuss the proposed ‘standing camp’, management of this proposal, assessment levels etc. As previously discussed, this omission is conspicuous and raises concerns over the long-term relevance of the Recreation Zone Plan.

Toilets

TWS supports the proposed upgrade of the Lake Vera toilet.

5. Future Recreation Management

Overall Strategy

TWS supports the consideration of a ‘seasonal booking system’ to help manage visitor numbers. This should be accompanied by a specific prohibition on the development of private commercial accommodation to ensure capped visitor numbers are made available for current clientele, being non-commercial visitors and commercial providers utilising existing infrastructure.

Fires

While TWS is not opposed to strategic burning per se, fires in the vicinity of Frenchmans Cap should be driven by ecological principles. TWS is concerned that the establishment of additional infrastructure, specifically private commercial accommodation, will drive a perceived need for asset protection prescribed burns at the expense of environmental values.

Other issues and strategies

TWS does not support the licencing of commercial helicopter use in the Frenchmans Cap recreation zone due to impacts on wilderness value and the amenity and experience of others. The Recreation Zone Plan should explicitly prohibit the provision of approval for commercial helicopters.

Conclusion:

The draft plan highlights the failures of the ‘market driven’ approach to tourism and visitor planning in the TWWHA currently employed by the Tasmanian Government. Planning is not based

on the prioritisation of the conservation of natural and cultural values, rather what proponents require to allow development approvals.

The Government's EOI process has been used as a means to identify barriers to tourism development, including long-standing prescriptions in current management plans that were in place to protect natural and cultural heritage values. Those prescriptions are then systematically dismantled. This is no more evident than with the development of the TWWHAMP.

The fact an EOI approved tourism development proposal for Frenchmans Cap is totally absent from the very plan pertaining to recreation management in the area is an indictment on conservation and visitor planning in the TWWHA. Given it purports to plan recreation for Frenchmans Cap for the next decade, this effectively renders the Frenchmans Cap Recreation Zone Plan redundant.

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