

**Tasmanian Conservation Trust Submission on the  
South Bruny National Park, Waterfall Creek State Reserve and Green  
Island Nature Reserve - Draft Management Plan**

Hon. David Llewellyn MHA  
Minister for Primary Industries,  
Water and Environment  
First Floor Franklin Square Offices  
Hobart 7000

19 November 1999

Dear Minister,

**South Bruny National Park, Waterfall Creek State Reserve and Green  
Island Nature Reserve - Draft Management Plan, September 1999  
Submission**

The Tasmanian Conservation Trust wishes to make the following submission on the above draft management plan.

**1. Overview**

We are of the view that the management plan fails to provide a means of meeting the management objectives for National Parks set out on page 7 of the document. The two major deficiencies are:

- a) in describing the Park and setting out proposals for management, the document has failed to place the Park in its geographical and historic context, and
- b) the plan does not satisfy the basic requirements to link proposed actions with stated objectives.

The Park is essentially a narrow coastal strip along the southern and eastern coastlines of South Bruny Island. In places this narrow strip of land is less than 50 metres in width. To attempt to set out management proposals without reference to surrounding terrestrial and marine environments is not possible. The Park cannot be managed in isolation from its wider environmental setting. The management plan also fails to adequately identify the cultural and historical context in which use and development of the area by humans has evolved.

What emerges as a result is a document that is shallow in its understanding of both the physical and environmental context and the way in which the Park has been used in the past and is currently used.

The description of the Park in chapter 1 fails to recognise these contexts and this failure leads to significant flaws in the management prescriptions. Because of the nature of the Park it will require unique and innovative solutions to management.

For example, South Bruny Island was an important point of contact between early explorers and the Tasmanian Aboriginal population. There are many sites within the Park where this contact occurred. The nature of this contact has been documented and it needs to be better understood and incorporated into management programs, but that contact cannot be considered in isolation from contact with pre-European owners of the land in adjoining areas such as Adventure Bay and the southern portion of North Bruny Island. Likewise the highly varied landscape and environmental features, particularly the interaction between terrestrial and marine environments is not adequately documented. The relatively sheltered waters of D'Entrecasteaux Channel, the highly exposed southern coastline of the Park, the cliff-fringed eastern coastline and the sheltered waters of Adventure Bay all have different terrestrial-marine relationships and require different management approaches.

It is both the variety and the interrelationships with adjoining areas that provide South Bruny National Park with its uniqueness. It is not, as with many other National Parks, only the intrinsic features contained within the boundaries of the Park.

For these reasons the TCT has serious reservations about the likelihood of success for any program of management based on such a shallow understanding of the area.

## **2. Specific Problems with the Document**

### **a) Descriptions**

Some of the descriptions contained in the document show little understanding and appreciation of the actual nature of land within the Park boundaries. On page 2 the phrase "the long unspoilt Cloudy Beaches" is used. Unfortunately Cloudy Beaches have undergone significant degradation and change from their natural state. They have been burnt and grazed intensively for a long period of time. Subsequent wind and wave erosion has changed the nature and form of the sand mass, particularly between Whalebone Point and Cloudy Corner. The area is dominated by exotic vegetation and many natural values have been either destroyed or diminished by intensive and insensitive human use. The area continues to be affected by activities both within the boundary of the Park and adjoining land.

In discussing the Aboriginal heritage, the plan, in section 3.5, generally describes the occupation of Bruny Island by the local Nuenonne tribe. It is not mentioned that there are many known sites within the Park boundary, including the Adventure Bay end of the Fluted Cape track, Cloudy Bay, Penguin Island, Labillardiere Peninsula, Partridge Island and the coastline between Mabel Bay and Cloudy Bay Lagoon. Many of these sites are subject to damage through human interference. Whilst the plan says they will be protected, we would ask how can they be protected if they are not documented or identified. It is also interesting to note that much of the discussion of the Aboriginal heritage refers to the whole of Bruny Island and not only the Park - this contradicts the failure to deal with other contextual issues.

In describing historic heritage there is a significant understatement of the role of locations such as Adventure Bay and Fluted Cape and Grass Point in the exploration, whaling and timber industries and the role of Labillardiere Peninsula in French scientific expeditions in the late 18th and early 19th centuries. The historic activities in these areas have significantly altered the natural environment and there are important remains of activities of early European explorers and settlers. For example, the plan does not mention recent excavations carried out by a team from Flinders University in South Australia into the remains of a whaling station at Grass Point, nor does it mention the fact that Grass Point was the last point of contact Captain James Cook had with Australia before sailing for Tahiti and his death. It does not mention the interaction between early explorers (particularly the French), whalers and the Aboriginal people. The timber industry hardly rates a mention in the whole document and yet its role and heritage significance has influenced the nature of landscapes and land use in the Park. For example, map 3 shows a track known as The Slides Track. The track actually enters the Park boundary in the Bay of Islands but the map does not indicate that. This track was used by the timber industry to transport logs from the hills behind the Bay of Islands to Adventure Bay. It has many features of historic significance.

The role of mutton birders in changing and modifying the landscape, particularly between Tasman Head and Cloudy Bay is not identified. Knowledge of their activities must exist within PWS records as there has been a significant effort to reinstate some of this area and to address some of the damage caused through years of neglect and misuse.

In its description the plan fails to mention what is obvious. That is that the Park is actually 3 separate sections linked by narrow strips of land. Each of these sections is different both in their cultural and environmental

evolution. The management plan treats them as one and in so doing simplifies reality.

### **b) Specific Errors**

There are a number of specific errors within the plan document. It is our view that these errors have led to serious misunderstandings which have affected some of the management recommendations.

We have mentioned above the deficiencies in both European and Aboriginal cultural heritage documentation. Some of the other errors are as follows:

- On page 1 Green Island Nature Reserve is identified as lying at the southern tip of Bruny Island in the D'Entrecasteaux Channel. Green Island is actually between North Bruny Island and the mainland.
- On page 6 the plan states that land forms are undisturbed or rehabilitating. This statement is incorrect for there is significant disturbance of land forms, particularly dune and beach systems.
- Again on page 6 it states that visitors pursue recreation based on the features and values of the Park without disturbing or detracting from the experiences of other visitors. Clearly the person who wrote this has not been to Cloudy Bay on a day when as many as 50 or 60 vehicles are using Cloudy Bay Beach. This causes significant disturbance to other users and detracts from the so-called quiet atmosphere of the place.
- Page 15 refers to Cloudy Bay Lagoon. Reference to map 3 indicates that Cloudy Bay Lagoon is not within the Park boundaries.
- On page 18 reference is made to the occurrence of the eastern quoll and it is stated that it was probably introduced to the island. There is considerable doubt about this statement and local wildlife experts have differing views. Also it is stated that the spotted tail quoll is absent. There could be doubt about this statement.
- On page 26, in dealing with exotic fauna, sheep are not mentioned. Grazing by sheep in the Cloudy Bay area and cattle at Cookville has caused significant environmental damage and some of the Park remains unfenced from adjoining grazing land.
- The list of weeds is deficient and the problems associated with their control and removal are seriously understated.
- On page 28 (section 4.3) reference is made to potential dune erosion problems. A brief visit to the area would have identified that these are not potential problems but actual problems. There is also erosion and

sand movement in other parts of the Cloudy Beaches, significant erosion in the old tracks to Tasman Head and the Friars, wind erosion of midden sites at Whalebone Point, soil erosion at Mabel Bay, Whalebone Point and in the vicinity of the lighthouse road.

- Page 33 (section 5.3) states that the key interpretation for reserves on South Bruny Island is located at the Neck viewing platform area. The Neck is not within the designated area of the Park and interpretation at that point relates to its role as a viewing area for penguins and mutton birds. To our knowledge it does not refer to areas within the Park.
- Table 2 has a number of mistakes that need to be corrected. For example, it identifies that there are direction signs at Jetty Beach and Cloudy Bay and at Grass Point. There used to be signs at Grass Point but these have recently disappeared and to our knowledge there are no directional signs at Cloudy Bay or Jetty Beach. Grass Point is identified as having toilets. To our knowledge there are no toilets at Grass Point.
- On page 48 it is stated that 2 rangers live on Bruny Island. We understand that currently there is only 1 ranger living on Bruny Island.
- On page 33 reference is made to the number of visitors to Bruny Island. There is no reference to the number of people who might visit the Park. This section also makes comparisons with Hartz Mountains and Cygnet but only deals with interstate and international visitors. It fails to identify that some parts of South Bruny National Park have local visitors (surfers, mutton birders, locals, bushwalkers) using areas such as Cloudy Bay, Fluted Cape and Labillardiere Peninsula in large numbers. It is a nonsense to compare Bruny South National Park with the Hartz Mountains. The mountains are much more isolated, they are not surrounded by developed land and are less accessible. We understand that vehicle counts are available for the Bruny Lighthouse road. These figures would have provided some indication of the level of visitation.

What all of this reinforces is our comment on the shallowness of the document and its inadequacies for proper planning. The authors do not seem to understand the nature of the Park and their research has failed to identify correctly much of the existing information about the area.

### **c) Identification of Management Zones**

Section 2 (Table 1) and map 4 identify the management zones for the Park.

Given the inadequate information and poor understanding of the Park, serious doubt must be cast on the validity of this zoning. The purpose in carrying out a background investigation for planning is to identify the resource values that exist in the place.

Planning prescriptions are then put in place to protect and enhance those values. There appears to be no link between resource identification, documentation of natural and cultural values of the Park and the proposed zonings. All the proposed zonings appear to do is to take as given existing use patterns, irrespective of the fact that these are associated with serious problems, and the areas designated. The proposed zoning bears little relationship to the capacity to achieve the objectives set out for National Parks (page 7).

For example, the continued use of Cloudy Beaches as a vehicle access route to Cloudy Corner, seriously compromises a breeding area for the hooded plover. On page 19 policies and actions are set out to protect bird habitat. There is an obvious conflict here and a decision has to be made by the planners about which has priority, recreational use or bird habitat. The two cannot coexist. Members of the TCT have been involved in collecting data about bird numbers on the Cloudy Beaches. The beaches are used by hooded plovers, silver gulls, pacific gulls, sandpipers, dotterills, forest raven, pied oyster catchers, sooty oyster catchers and vagrant birds such as king penguins and kelp gulls. These birds are concentrated towards the northern end of the beach which is the most heavily used by vehicles. There are also several bird species that use the dunes as habitat. These dunes are also subject to vehicle use and there is a conflict between this activity and bird habitat.

It is our very strong view that vehicles cannot continue to use Cloudy Beach. The management objectives of a National Park cannot be met if the use continues. We understand that a considerable section behind the dunes is a reserved road and it ought to be possible to extend the current track from Cloudy Bay Road to Cloudy Corner. Either that or require vehicles to remain in the carpark at Whalebone Point.

Penguin Island is identified as a natural zone, however, access to the island is easy and there is already evidence of significant damage by users attempting to move through the bush to the highest point in the island and from fires, yet the plan contains no prescriptions to control access to the island.

These are just 2 examples of the failure to properly link an understanding of the resources and values of the area with management prescriptions to protect and enhance those values.

### **3. Management Program**

The management program set out in the plan can best be described as a wish list. Whilst the TCT has no particular problem with many of the proposals for management and indeed many of the actions, one can only wonder at the reality of such a wish list when existing resources cannot even maintain the present situation let alone achieve some of the objectives set out in the plan. It must be remembered that the existing resources also have to be utilised in areas outside the Park such as the Neck Game Reserve.

To set out a series of management objectives, policies and actions, which in our view have absolutely no hope of being implemented, is bordering on deceit. It will build up the expectations of locals and other users of the Park. If it cannot be achieved it will bring into disrepute the whole process of Park management planning. Achieving the objectives set out in the document will require a many fold increase in resources over existing levels. The plan does not identify either the nature or the quantum of those resources.

To cite one example, the management of the area between Adventure Bay and Grass Point will require at least the following actions (as based on actions specified in the plan):

- further archaeological investigation;
- identification and protection of Aboriginal sites;
- a fire management plan;
- a weed removal and eradication program;
- track maintenance and building;
- signage;
- removal of exotic fauna;
- construction of facilities such as a toilet at Grass Point;
- development and installation of interpretation material.

The plan says that all of these things will happen. The TCT remains unconvinced that anything will happen.

The same comment could be made for heavily used areas such as Jetty Beach, Cloudy Bay and the lighthouse area.

The plan does not set out any proposals or actions for other areas that are under user pressures. Areas such as Lighthouse Beach, Mabel Bay, Fluted

Cape, the entrance to Cloudy Lagoon, Partridge Island and Whalebone Point hardly rate a mention.

This concern highlights the fundamental flaw in this plan. The authors do not understand the nature of South Bruny National Park, the way it is used and the way it has evolved culturally and historically. There are significant conflicts between the local population and policies imposed from outside. For example, there has been little consultation with the local population about access for dogs and vehicles at Cloudy Bay. This has created significant tension between the local community and Park staff. This has not been recognised in the management plan and we could find no reference to resources being provided for a consultation and education program with the local population. Without such programs the management plan is doomed to failure in some of its key objectives.

#### **4. Planning and Approval Procedures**

The management plan does not make it explicit as to how works associated with the implementation are to be approved. It does refer in section 4.5 to the preparation of site plans where it is stated that "*planning and design objectives and performance standards may be defined in the site plan for the zone in which it deals*". Given the lack of resources and the urgent need for development of facilities, how long will it be before such site plans are prepared?

Of a more fundamental nature, it appears as though the plan still fails to recognise the responsibility for approvals within the Resource Management and Planning System. This is a matter on which the TCT has a strong position. We would ask the fundamental question, why should PWS be allowed to develop facilities, carry out works and undertake actions that change resources without proper public scrutiny? Why should an adjoining landowner have to be subject to a public process whilst PWS can do what it wishes without effective public scrutiny. The establishment of a separate and closed approvals system by PWS is one of the reasons why there is such public resistance and opposition to the activities of the Service. This is particularly critical given the inherent weaknesses in this plan. For example, who is to approve all of the works listed for Grass Point? What design and construction standards are to be used in those works?

The Land Use Planning and Approvals Act is quite clear that the "Crown is bound". It is the TCT's view that any site plan or any works defined in that Act should be subject to an approval process that is transparent and allows for effective third party involvement. Planning for the Park should also be integrated with planning for land use in surrounding areas. The notion that the Park somehow exists in a vacuum with no administrative or physical

relationship to the surrounding land and water is ridiculous. We note that the plan does not even accept the overarching objectives for sustainable development as set out in the Resource Management and Planning System.

Whilst it is hinted that there may be development undertaken by private operators within the Park boundaries, again there are no procedures through which such developments may be considered and approved. This highlights a problem that PWS have for a long time refused to acknowledge, that they are actually part of the wider community and that the development and use of land and resources within their jurisdiction is a community issue.

## **5. Summary**

The TCT does not consider that the plan is an adequate document to guide the future use and management of the Park and Reserves. At the very least the document should:

- a) understand the Park's cultural, historical and environmental context and its physical setting;
- b) provide accurate documentation;
- c) link the resources and values of the area to a set of objectives for their future management and use.
- d) provide a realistic program that links objectives and actions for management and which recognises the level of resources likely to be available;
- e) be developed and implemented through a transparent and publicly accountable process.

Yours sincerely  
Michael Lynch  
Director