

Below is the Tasmanian Conservation Trust  
Response to the Call for Public Comment on  
Additional Helicopter / Floatplane Proposals  
To Access to Sites in the Tasmanian  
Wilderness World Heritage Area

Mr Max Kitchell  
Director Parks and Wildlife Service  
GPO Box 44A  
Hobart TAS 7001

14 February 2000

Dear Mr Kitchell,

Call for Public Comment -  
Additional Helicopter/Floatplane Proposals/Sites  
Tasmanian Wilderness World Heritage Area

1.

The Tasmanian Conservation Trust wishes to comment on the proposal for additional helicopter/floatplane proposals/sites in the Tasmanian Wilderness World Heritage Area. It is our very strong view that this process has evolved in a highly inappropriate, exclusive and unbalanced way and it should be withdrawn forthwith. We support this view with the following information.

2.

Issues and Options Papers were the second stage of public comment on the review of the first management plan for the Tasmanian Wilderness World Heritage Area. The papers were available for public comment between June and August 1996. A set of ten 'Issues and Options Papers' and an accompanying 'Comment Guide' were sent to all individuals and groups who had made submissions in the first stage of the public comment process and others who had expressed interest in receiving the material. The ten papers covered selected topics where the Parks and Wildlife Service considered that public comment would be particularly useful.

3.

Issues and Options Paper no 10 dealt with aircraft overflights. The Issues and Options Report published in November 1997 summarised the responses to the Papers and in the case of aircraft overflights found:

"There was a broad spread of opinion on this issue. A few respondents considered concerns about aircraft overflights to be ridiculous, but most

users of areas remote from mechanised access (anglers on the Central Plateau and most bushwalkers and conservationists) expressed some level of concern. For most respondents the noise of aircraft was their main concern but anglers particularly were also concerned at the possible appearance of additional people and facilities in remote areas as a result of helicopter or floatplane landings. Few of those concerned advocated a total ban on aircraft overflights, but there was strong opposition to additional landings, [emphasis added] and many suggestions were made on possible restrictions on aircraft activity to contain the noise problem."

4.

The draft management plan was released for public comment on 14 November 1997 with the comment period closing on 16 January 1998. In spite of the strong opposition to additional landings the draft management plan provided at page 134 as follows:

"The above management prescriptions under landings are subject to an investigation of options for providing for commercial floatplane or helicopter tourist access to additional lake (or other) sites in the WHA where there is no conflict [emphasis added] between proposed commercial uses and other visitor uses of the land or, with the World Heritage and other natural and cultural values of the WHA."

A summary of public comments received on the draft management plan was published in April 1999. Under the heading "Aircraft activities, landings - floatplanes, helicopters", the summary found:

"This topic aroused the strongest reaction of all issues raised from the widest variety of groups [emphasis added]. The draft plan proposed an investigation of possible landing sites where there was no impact on the environment and no user conflict [emphasis added]. Conservation groups, walking groups, commercial bushwalking tour companies, the Aboriginal community, many individuals and particularly angling groups strongly opposed this provision. For example - 'Note with alarm the proposal' (major conservation groups); 'Complete objection to aerial intrusion into these areas - completely destroys the wilderness aspect' (a major angling group).

The proposal was supported by a major tourism organisation, floatplane and helicopter operators and some commercial tour operators who would take advantage of the access provided. They noted that this means of access had less impact on the World Heritage Area than walking, and that not allowing aircraft access was biasing access in favour of walkers."

6.

Undaunted by, and seemingly oblivious to, the level of concern over

additional landing proposals / sites, PWS pushed on regardless and finalized the management plan. The relevant section (page 135) had changed to read:

"The above management prescriptions under landings are subject to an investigation of options for providing for commercial floatplane or helicopter tourist access to additional lake (or other) sites in the WHA. Additional landing sites may be made available following this investigation, subject to the following conditions:

- a maximum of three additional sites beyond locations mentioned previously in this section may be made available;
- sites are to have nil or very little conflict [emphasis added] between proposed commercial users and other users of the site;
- landings are to have nil or minimal impact [emphasis added] on the World Heritage and other natural and cultural values at the site;

7.

One can only hazard a guess at the rationale behind this change from the draft management plan. This is particularly worrying in view of the requirement at page 48 of the management plan to "Base community consultation processes for planning on the principles of open communication and honesty; transparency of process and inclusion rather than exclusion." Likewise at page 64 of the management plan, the first objective of community engagement is to "Engage the public in WHA planning and management in a meaningful and productive manner." Clearly one major tourism organisation and commercial tour operators "who would take advantage of the access provided" held far more sway with PWS than conservation groups, walking clubs, the Aboriginal community, many individuals and angling groups who strongly opposed this provision."

8.

The management plan took effect on 17 March 1999. To help strategically implement the plan ten key focus areas were identified. These are largely new areas of effort where substantial additional effort will be focused over the first five years of the plan. One of these is the development of a strategy for tourism and recreation (STAR) which will analyse visitor requirements and how well the present facilities are meeting these requirements. The STAR is required to be completed as a priority within twelve months of the management plan being approved (8 March 2000).

9.

The STAR is being developed with the assistance of a steering group whose

membership includes the Tasmanian Conservation Trust. We believe we are able to comment on the STAR process with a reasonable level of knowledge. Included in the strategy is the range of transport facilities to and within the WHA (transport services, roads, aircraft landing areas etc). Chapter 5 of STAR deals with the needs of remote-area visitors. It does so by looking at major recreational uses of the WHA, how they are currently catered for and explores what will be needed over the next five years. This section also looks at new forms of access to remoter parts of the WHA (such as helicopter/floatplane access and cruise boat access).

10

Chapter 5 has not yet been prepared by PWS staff and therefore has not been considered by the steering committee. Again though, undaunted and oblivious to the lack of a strategy, PWS are pushing blindly ahead with proposals for additional proposals/sites.

11.

The management plan requires that proposals/sites must comply with the zoning prescriptions. These do not allow facilities at proposals/sites in the self-reliant recreation zone but do allow facilities at proposals/sites in the recreation zone. The proposals/sites at Prion Beach and Mount Milner are in the recreation zone. The management plan allows, at page 132, accommodation of suitable design and scale in the recreation zone. At page 152 the management plan provides for huts and shacks. These are defined as including huts open to the public, huts leased or licenced to groups and huts leased or licenced to private individuals for their exclusive use. New huts are allowed so long as they are compatible with the zoning scheme.

12.

At page 179 the management plan provides for guided tours. Commercial huts and temporary standing camps are allowed in the recreation zone. It does not take much imagination to see a proposal/site in the recreation zone including fuel dumps, accommodation (lodges, huts, standing camps) and facilities for guided tours, and all in keeping with the provisions of the management plan.

13

One of the proposals/sites is for Newlands Cascades. Although PWS will not provide details of the proposals/sites, an article in the Sunday Tasmanian newspaper of 23 January 2000 suggests this proposal/site involves lifting people from Strahan into Newlands Cascade and placing them on the Franklin River for fifteen minutes to allow them to experience the river. In addition, groups of eight people each week from November to March would be flown in for rafting trips.

14.

The Newlands Cascade proposal/site was previously in the public eye as one of five case studies prepared by Simon Cubit from the Tasmanian Traditional and Recreational Land Users Federation for the Tourism Council of Australia (Tasmania) in their September 1999 report, 'Government Land Management Impediments to the Achievement of the Tourism 21 Strategy'. The case study was described as "Incentive Group Access to the World Heritage Area" as follows:

"In 1997 West North West Regional Tourism executive Jenny Cox obtained an e-commerce grant of \$400,000 from the Commonwealth 'Networking the Nation' program to develop an innovative Internet package promoting adventure experiences in Tasmania. The 'Networking Tasmanian Adventures' booklet was launched in May 1998 and has been highly successful. The web site will be on line in September 1999.

On 23/7/1999 Jenny was contacted by a company which operates incentive travel programs for a number of national companies. Inspired by the exciting possibilities outlined in the Networking Tasmanian Adventures brochure, this company wanted to create a unique 2-3 day Tasmanian West Coast experience as their headline offering.

Operating at the top end of the market, the company wanted to run the first trip in September 1999 for their national and influential clients and then run successive tours each month for a minimum of one year. The groups would consist of between 10 and 20 clients and each tour would deliver about \$2000 per person into the regional economy. The particular experience the company sought was the following:

- Arrive Burnie Airport
- Light plane transfer to Queenstown airport
- Helicopter or 4WD to Mt McCall
- Walk down to Franklin River
- Nine km paddle downstream to Newland's Cascade on the Franklin River
- Overnight camp at Newland's Cascade
- Helicopter flight out next morning to Strahan
- Two nights at Strahan for workshops and conference facilities
- Light plane transfer to Burnie

- Burnie to Melbourne

Jenny was asked to make the arrangements in advance of a visit the following week by a company representative wishing to trial the experience. The ability to be able to respond quickly with a complete package was critical in the competitive environment of national incentive travel, especially given that the business was worth almost \$500,000 per year to the West Coast."

15.

Quite rightly we understand that when contacted by Ms Cox you pointed out the obvious that landing a helicopter at that location was contrary to the management plan and therefore not allowed. End of story - or so it should have been. The Tourism Council response to this case study was:

"The Parks and Wildlife Service response to this tourism opportunity was uniformly negative. Displaying an indifference to the economic and social benefits to the region, it consisted simply of stating what could not be done. Its long planning timeframes and bureaucratic procedures are simply out of step with the needs of the tourism industry which requires timeliness and flexibility.

While Jenny was ultimately successful in securing the business for the West Coast using a modified program, the experience was extremely frustrating. It demonstrated that whereas there is an existing demand for high-yield incentive tourism within the WHA capable of generating significant regional economic activity with little environmental impact, access to support such activities are currently very limited. Perhaps more importantly in the long term, there is little willingness on the part of the Parks Service to do anything about it."

16.

Not so. We now find the Newlands Cascade proposal/site fairly and squarely back on the agenda. The Tourism Council and West North West Regional Tourism must be very pleased.

17.

The TCT has previously expressed its concern regarding the process the PWS have followed in dealing with these proposals/sites. Attached please find a letter we wrote to the chairperson of the WHA Consultative Committee on 28 January 2000 regarding these concerns. We wish this letter to be included as part of our submission. One slight change we would make however is that as of 12 February 2000 an "Omissions from Previous Notice" has still not been published in the *Examiner* newspaper.

18.

The TCT has also written to you on two occasions, 17 and 28 January 2000, seeking clarification and additional information regarding the additional proposals/sites process. You responded to our 17 January letter on 10 February. We wish our two letters and your response to the first letter to be included as part of our submission. We would make two comments in response to your letter. Firstly, as far as we are aware the World Heritage Area is called the "Tasmanian Wilderness" WHA not the "South West" WHA. Secondly, your state that "The management plan, of course, excludes the development of on-ground facilities." As we stated at paragraphs 11 and 12 above, the management plan does allow on-ground facilities in the recreation zone. Perhaps you could clarify this point. We have not yet received a reply to our second letter.

19.

We submit that there is very strong broad-based opposition to this proposal for additional proposals/sites, there has been no justification shown for the additional proposals/sites and the procedure so far has been anything but proper. In the light of these circumstances you have no choice but to withdraw the proposal forthwith.

Yours sincerely,  
Michael Lynch  
Director