

DRAFT ENVIRONMENTAL GUIDELINES FOR TOURISM DEVELOPMENTS

Prepared for

THE WEST AUSTRALIAN TOURISM COMMISSION

AND

THE ENVIRONMENTAL PROTECTION AUTHORITY

by

BRIAN J. O'BRIEN & ASSOCIATES PTY LTD

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FOREWORD

Many tourism developments in Western Australia are attractive mainly because of the natural environment. Tourism is a dynamic growth industry vital to the economic well-being of the State and community. So it makes sense for tourism to help with management of the commodity - the environment - on which it depends.

The environmental attractions may be beaches or inland rivers or estuaries, wildflowers or wildlife, rugged remote gorges and rivers, forests or fishes, underground caves or above-ground rock formations. All these form fundamental parts of the attractions that Western Australia has for resident and visiting tourists.

The paradox for both tourism developers and environmental managers is how to balance tourism exploitation of these natural assets with their environmental preservation and management. Examples of this problem range from a crowded Rottnest Island to a littered Wave Rock to drying-up limestone caves of the SouthWest, through to the sandy scars of tracks thrusting through dune vegetation along much of the coast.

Many of the environmental beauties of Western Australia are fragile, and while we accept dynamic changes in them caused by Nature and natural forces, we are less tolerant of the heavy tread of mankind, and in particular of the species Homo Tourist.

So there is a need for environmental guidelines to protect the environment in tourism developments. But there is another role for such guidelines, which is basically to present a challenge to tourism developers and their architects, posed by the character and flavour of the various Western Australian environments. The challenge is a positive one, to design resorts or developments that blend with and are integrated into the environment so as to provide added, and serviced, beauty.

These Draft Guidelines, commissioned jointly by the Western Australian Tourism Commission and the Environmental Protection Authority, are therefore both protective and creative. They deal broadly with attitudes and philosophies, because they cannot possibly be "site specific".

The Draft Guidelines are intended to begin public discussions on the best ways to marry tourism and the environment synergistically in Western Australia. And, basically, the attempt is to effect such a marriage of beauty before tourists "love the environment to death".

1. ENVIRONMENTAL ETHICS REGARDING TOURISM

Before we can set environmental guidelines for tourism developments, we need to explore a little the extent to which the "environment" belongs to the community versus to an elite.

It is a fact that the traditional rights of a man's property being his castle are being, and have been, eroded greatly under much modern legislation. There is little point in debating here the extent to which modern legislatures have intruded into the domain of private property.

Often the reasons for dictating the details of a house on private land are ones of protecting the health of the surrounding community, or even of the house occupants. Or it may be for the more efficient use of community (ratepayers or taxpayers) money in providing services like roads or water or power. Or it may be for matters of zoning, or aesthetics, or some grand strategic plan. Similarly, constraints may be placed on public land.

But with tourism developments, there is a traditional Australian ethic that all environmental attractions on public land should be available to the entire community, unless there are outstanding reasons - generally of a scientific nature - why there should be either temporary or permanent exclusion. Threatening of a rare species, erosion of a delicate land structure, are some such reasons. (We emphasise that the whole issue of Aboriginal land rights was deliberately excluded from the Terms of Reference, because of its immense delicacy and complexity.)

So, apart from issues of trespass on private property, it is the fundamental ethic adopted here that any member of the community has an equal right of access to community or common land. Whether he or she can afford to use any tourism development is quite properly a matter for determination in the market place.

Following on from this, every member of the community has, subject to legislative agreements or approvals, both an interest in and a responsibility to care for and to enjoy the local environment, and ensure that future generations can also enjoy it, either in pristine or in improved form.

And it is from this community expectation that the various Government agencies should exercise their many and varied powers. We maintain that those powers should not have a negative or reactive flavour, but rather a proactive flavour. There should be a mutual desire to actually enjoy the environment. If man's intrusion by responsible tourism development can achieve this, then it would be a disservice not to proceed.

As a simple example, there should be no private beaches, unless already vested under an old title.

Conversely, there can be no objection to the concept of private golf-clubs, say, developed by entrepreneurial capital on private land.

On the controversial issue of National Parks, discussed below, we see no reason why responsible tourism developments should not be used both to enhance or intensify the enjoyment of those who wish to pay to use responsible tourism developments on them, provided only that in so doing the enjoyment by the non-paying community at large is not lessened.

If indeed, to use that particular example, the tourism development would lessen the common enjoyment for the sake of an elitist enjoyment, then the community at large must take precedence and priority. This is not a political point of view, but part of the total intention of the notion of a National Park, notwithstanding that in the formative years of the conservation movement some of Wordsworth's group in the English Lakes District may have been more selfishly motivated.

What we would like to see develop, and hope that these Guidelines may help develop, is a synergistic interaction between tourism and the environment, so that the whole is greater than the mere addition of the two separate parts. To use the National Parks example again, responsible tourism developments should assist in management of the parks, and the development's infrastructure such as roads and the ubiquitous toilets should assist not only the paying tourist customer but the public at large in their enjoyment of the parks.

In short, we would like a harmony to develop between tourism and the environment that will prove to the advantage of both. And for that harmony to develop there has to be a change in environmental ethics so that "tourism" is not always regarded as a "dirty" word in the minds of environmentalists and environmental managers.

2. TOURISM ENVIRONMENTAL ETHICS - THE BROAD GUIDELINES.

In Section 1 we dealt with ethics for environmentalists with regard to tourism, making the case that there is not necessarily any need for environmentalists to regard "Tourism" as a "dirty" word, and that indeed tourism and the environment can be symbiotic and hopefully synergistic (see Section 5).

For this to occur in the real world, however, there must be a quid pro quo, and tourism developments in turn have to develop their own set of ethics towards the environment. Indeed, that basically is what this set of guidelines is directed towards.

This section deals with broad philosophies to cover such ethics. Later sections come down to their practical applications, although no attempt is made to guide the general location of a tourism site, this being largely market-driven. Assume a site is known.

2.1. The first Guideline is an Axiom.

GUIDELINE 1:

ESTABLISH RAPPORT AND EMPATHY WITH THE SITE.

It may seem self-evident that an architect or developer should first establish rapport and empathise with the chosen site before the first design lines are drawn, but we all know of developments where the structures and layout clash with the natural environment. Their scale may be wrong, or their colours or angles, or their content and surrounds.

It is simply not good enough for city-bound architects and designers, no matter how well-equipped with contour maps, stereo photographs and coloured stills or movies, to draw up a concept for a major development from a desk, aided by some palette-equipped graphic artist.

The initial conceptual designs must be in harmony with their environment from the very outset, because it is only too easy to continue to draw upon the original concept and make minor variations to it in attempts to "tune it up", when it may be completely and utterly inappropriate in the first place. Not only should the designs gain from their surrounds, but they should positively contribute to them, and perhaps enhance them.

Tongue only partly in cheek, we suggest that architects should be dropped at the nominal site with a tent, sleeping bag and a billy, and be told "We'll be back to pick you up in three days."

Yet in fact, an award-winning team that designed the environmentally-tuned highway through the Hamersley Range did just that. As a consequence, they "fell in love with the place". The onerous conditions of environmental protection placed on them and their contractor crews were severe and detailed -such as a fine of \$1,000 for any large tree felled, and \$500 for smaller ones. Their crews were given an environmental indoctrination, and signed a certificate of compliance. The ones to err most were actually outside subcontractors. The rapport the entire crew had with the gorge environment is reflected in the splendid results. Yet the "environmental overhead" costs were only of the order of our standard 2-5%.

The whole contouring of embankments in the Hamersley case included creation of simulated draws or gullies, in an attempt to copy Nature. Yet sound engineering practices were followed to avoid danger from rock falls, water erosion and the like.

2.2. It seems quite possible that in fact the environmental conditions set on the Hamersley construction group were sometimes unnecessarily onerous. In that particular case we would have to suggest that the environmental bureaucratic administrator should equally be behoven to at least visit the site in question, so that his written conditions were not simply regurgitated versions of conditions, laid down elsewhere, that seemed applicable.

GUIDELINE 2:

THERE HAS TO BE A TWO-WAY REAL DIALOGUE BETWEEN THE DEVELOPER AND THE ENVIRONMENTAL ADMINISTRATOR. AND THE DIALOGUE SHOULD OCCUR IN THE FIELD, ON-SITE.

The axiom of empathy can not only result in winning awards, as with the Hamersley road. It can be of practical value to the developer. By walking with locals round another proposed development, and learning of their fondness for its environment, another resort developer in the NorthWest learned of a unique area on site where the topography and microclimate were such that there was never any wind at all. Building a holiday cottage there would have been the cause of endless discomfort.

Often in remote beautiful Western Australian areas, there are professionals who have adopted different occupations, but retain or develop environmental expertise. There may also be professional "dropouts" who may be very appreciative and even knowledgeable of local flora and fauna and beauty spots. We suggest where possible, and where personalities permit, that their knowledge be put to some community benefit through application to planning a tourism development.

Obviously the developer must also appreciate the physical climate of a proposed site. The wind directions and speeds, temperature ranges etc are obviously all part of the environment that must be considered. Many failures to react to these inevitabilities exist in tourist resorts, or restrict the duty cycle of tourism attractions. The Wet/Dry seasons of the North pose their own problems, but in the popular SouthWest it is possible to create year-round tourism interests, as at Rottnest Island.

2.3. Creating a tourism development will naturally involve some disturbances to the natural environment. These might be small and localised, as with safari or safari-tent holiday arrangements. Or they might be extensive as in provision of resort accommodation on the scale of a multistar hotel. Clearly the auxiliary disturbances, eg in roads, parking lots, buildings, expansion of water and other services, need to merge in with or at least be sympathetic with the existing old and the ultimate environmental character of a site. Effective landscape design is clearly critical, including details like informative signs.

So the third guideline is self-evident in the short term, but it is one that has to prevail long term, through changes of ownership and through tourist lulls as well as booms.

GUIDELINE 3:

A TOURISM DEVELOPMENT SHALL NOT REDUCE THE ENVIRONMENTAL ATTRACTIVENESS OF THE VICINITY, either through pollution or long-term damage to the natural environment or through gradual degradation, or otherwise lessen the environmental attractiveness that drew the development to the site in the first place.

This might be termed the "Don't foul your own nest" guideline. It is self-evident, but it has vital consequences, legal and economic, for both developers and for the community, represented by the Government. These lead naturally to Guidelines 4 and 5.

2.4. The environmental issues on a project can be very broad-ranging. There is an important and partly unresolved question as to the relative responsibilities for environmental management and possibly corrective or remedial actions once a project begins. It is clear in some cases, but not in all.

GUIDELINE 4:

THE DEVELOPER IS RESPONSIBLE FOR ANY NECESSARY ENVIRONMENTAL MANAGEMENT AND, IF NEED BE, REMEDIAL ACTION, UNLESS OTHER TERMS ARE AGREED UPON BEFORE THE PROJECT COMMENCES.

The developer, being subject to extensive environmental review by the Government, may be cautioned that he can proceed only if certain environmental conditions are met. Then, if he does not meet them, the full cost of rectifying them to the Government's satisfaction, must be born by the developer. This is in accordance with subsections 48(4) and 48(5) of the Environmental Protection Act (1986). Its applicability to public land and waters is beyond doubt, but applicability to any private land on which the development takes place may not be so clear.

However, if he does meet these conditions, and yet environmental damage of significance to the community still results, the question arises in the real world as to who faces the costs of remedial measures.

Should the developer have reasonably expected the comprehensive Government review to have covered all environmental contingencies, and thus can he reasonably place responsibility for remedial measures at the Government's feet, with costs to be borne by it ?

Or should the community rightly take the view that the environmental degradation would not have taken place without the tourism development, and that therefore it remains a rightful charge in perpetuity against the developer ?

The legal aspects of the alternatives are quite daunting. The environmental sciences are seldom so exact and expert in forecasts that they can guarantee the subtle changes that might occur naturally in a dynamically-changing environment, i.e. even without the development in question. It would often be very complex and perhaps impossible to attribute a certain proportion of an environmental change to a given development, and to guarantee that at least some change would not have occurred over time without the development.

Examples we have in mind include the building of the causeway to Garden Island, and whether it had significant effects on the circulation and flushing of Cockburn Sound, which in turn is vital to the ecological well-being of Cockburn Sound under varied assaults by commercial discharges of wastes.

There are examples where development produces very obvious environmental degradation, and remedial or compensating costs might be estimated, although it is not clear what monetary value to put on a particular species of flora or fauna, at a particular site. The cost of rehabilitation could be a starting basis.

So some agreement is necessary between developers and Government to ensure that the future community is safeguarded against the present-day desire of both to develop. As we have said elsewhere, the environment has a very long memory. We have only to view the costly remedial measures being considered to remedy or lessen the weed spoilation of the Peel Inlet and Harvey Estuary by years of accumulation of nutrient (fertiliser) run-off into the sediments.

There is a converse to this which may prove useful in deliberations. Suppose that a Government agency, with full environmental clearance, developed a tourist resort (perhaps as a joint venture) and then sold it to a private buyer. Such examples can be expected to grow under present policies. Suppose then there is later environmental degradation, requiring costly correction.

At whose feet is the responsibility, or does caveat emptor apply?

As a further variation to this question, consider a development where the Government has given an approval, but has cautioned that it is in an area where there may be damage in a 1 year in a 100 flood. Who pays for any such damage and consequential damage? Or is the matter to be given over to insurance?

2.5. Because of the above discussions, and because these are Draft Guidelines for discussion of complex issues, we advanced Guideline 4 and now follow it with a correlated Guideline 5.

GUIDELINE 5:

IF GOVERNMENT APPROVAL IS GIVEN TO A PROJECT WHERE THERE IS EXPERT OPINION THAT FUTURE ENVIRONMENTAL DAMAGE MAY OCCUR, THEN IT SHOULD BE GIVEN WITH A CAVEAT, DULY REGISTERED ON THE TITLE OF THE LAND, AND THUS CLEAR TO FUTURE PURCHASERS, THAT THE GOVERNMENT (AND HENCE THE TAXPAYER) IS ABSOLVED FROM FUTURE DAMAGES AND REMEDIAL ACTION.

2.6. Development of a tourism project is directed towards enhanced enjoyment by an elite clientele. (We do not use the word "elite" here in a derogatory or pejorative sense, but merely to identify the direct tourism market).

GUIDELINE 6:

THE DEVELOPMENT MUST NOT LESSEN COMMUNITY ENJOYMENT OF THE LOCAL ENVIRONMENT.

Basically, we maintain that, within reason, the tourism development must not be such as to deprive or degrade significantly the expectations of the community to enjoy either their traditional or their hoped-for environmental resources. These traditional or hoped-for resources do not, of course, include illegal use of private land or "squatting" or similar usurping of common land, owned by the Crown and managed by its representatives, whether by way of State or local authorities.

The principal aim of this guideline is obvious. It is to increase harmonious common use of the common environment. If it is the decision by Government to allocate some portion of this environment to an elitist tourism development, for example, then it is within its authority to do so, but it must then accept the full associated responsibility.

2.7. It is appreciated that the prime aim of the tourism developer must be to get a monetary return on his investment. Nevertheless, from an environmental view he must give some recognition to the environmental neighbourhood.

GUIDELINE 7:

WHERE PRACTICABLE, THE DEVELOPMENT SHOULD ENHANCE COMMUNITY ENJOYMENT OF THE ENVIRONMENT.

Wherever practicable, and without prejudice to the marketability of the tourism development, part of the landscaping or other environmental developments should add to community enjoyment. For example, the visual design should blend in with the surrounding natural landscape so as to enhance it or at least not be a jolting visual intrusion to the external viewer.

Landscape architecture should be an early intrinsic part of the design - as it generally is, of course. But due attention should be given to the philosophies of groups like Greening Australia, where long-term revegetation with locally-native species is encouraged. This is not merely an academic suggestion, but one consistent with the development blending in naturally.

Other aspects that we would include under the broad mantle of environment here would be such issues as improved water supplies or other services. Clearly in such cases there would need to be mutual agreement as to the relative cash or kind contributions to be made towards the tourism venture by Government or other persons. The tourism venture can scarcely be expected to subsidise the community financially in such matters.

The recently implemented Government policy to assist tourism developers in early charges for headworks, i.e. water and electricity services, is a step in this same direction. It is intended to relieve at least some of the initial capital expenses for subsequent repayment once the tourism operation gets into viable operation.

The above set of seven Guidelines is very broad in nature, yet they set a philosophy of interaction between the tourism developer, the environment and the community at large.

One of the problems encountered in tourism developments in the more remote yet beautiful areas of Western Australia is the sense of possessiveness on the part of the local residents and the repeated family tourist with their holiday houses. They regard the area as theirs, and are resentful of temporary intruders. Although economic arguments can be made about increased employment opportunities and improved services, these often carry little weight.

Hopefully these Guidelines, if agreed, will also help to have the tourism development and the local communities combine more efficiently and harmoniously. The disagreements, more often than not, are fundamentally about environmental issues, broadly addressed in philosophical terms in this section.

In all the above we have taken a very anthropocentric or human self-centred view of what constitutes the environment.

We have not addressed issues such as protection of rare or endangered species of flora or fauna, simply because the appropriate specialist Government agency can do so for specific sites. Details are discussed in later sections, however.

The most common and overwhelming need for environmental guidelines for tourism developments is the need for guidelines as to the effects on the human environment, and we make no apologies for this anthropocentric emphasis.

3.

ENVIRONMENTAL PRACTICALITIES

It will be appreciated that in the immensity and immense variety of environments of Western Australia, one cannot provide very detailed environmental guidelines without being "site-specific". The very broad thrust of the seven guidelines in Section 2 has to be interpreted for each specific site, and the plans for the particular development tested against the philosophy of those guidelines. But at least the philosophies are now articulated, even though they are in very general terms.

This document cannot attempt to make guidelines too specific and to cover all possible eventualities of types of development and types of locations. If it did, it would inevitably be doomed to failure by a combination of the Second Law of Thermodynamics and Parkinson's Law. It would also be an impossibly vast volume.

It would also neglect the vast amount of work done in recent years by various Government agencies that have produced, after considerable deliberation, very valuable guidelines on management of various classes of land, eg wetlands, coastal areas, and on various regions, eg Shark Bay, Leeuwin-Naturaliste, the Swan and Canning Rivers, and so on. Those studies have not been directly or solely related to tourism, but the Tourism Commission itself has a wide variety of Tourism Development plans for various regions.

It would be quite silly to try to replicate segments of those studies here. They have been valuable sources of information, and are discussed in Section 6 and referenced in this section.

Nevertheless, to add a more direct practical element to the philosophical guidelines of Section 2, it is possible to provide some broad guidelines by the category of the environment of a proposed development. And by far the dominant tourism attraction in the State rests in the coastal and marine areas, in which we include estuarine areas, particularly of the SouthWest.

3.1. COASTAL AND MARINE AREAS.

With over 12,000 kilometres of coastline in the State, and only 1,500,000 residents, one might think that there should be little cause for jealousy about use, and ample room for tourism developments. But of course there are many prime and locally-beloved locations, particularly in the SouthWest, where there is already competition and occasional aggression between various groups of local users, even without additional pressures from a specific tourism development. Thus at many popular rock fishing points, there is already overcrowding at peak periods. Tangling of herring fishing lines can often lead to unkind words. In some of the estuarine areas, there is antagonism between professional and amateur fishermen.

At Lancelin, there was a working agreement between boatmen being effectively segregated from swimmers, who then were intruded upon by boardriders, and now the growing popularity of windsurfers threatens to divide the community again. There is intense competition for use of the Swan and Canning Rivers, and so on.

There is legislative machinery to segregate or zone such uses, but a natural reluctance to impose it with too heavy a hand, or to involve the cost and complexity of administering it. That is irrelevant here - the point that is being made is that, in spite of a vast coastal environment and small population, there is already heavy local competitive use, and tourism developers must be cognisant of it.

The average West Australian regards it as an inherent right to have free and unfettered use of the beaches and ocean frontage, regardless of whether he is an urban dweller or a holiday maker from a harsh dry inland area.

GUIDELINE 8:

THE RIGHT OF ACCESS TO BEACHES AND OCEAN FRONTAGE
MUST BE MAINTAINED, PROVIDED IT IS DONE IN AN
EQUITABLE AND ENVIRONMENTALLY RESPONSIBLE MANNER.

So it is probably in the coastal and marine areas, more than in any other category in the State, that the tourism developer has to exercise greatest environmental and planning care. Conversely, of course, it is where he is likely to get most customers.

Fortunately, there has been a great deal of careful and deliberative work evolving towards coastal policies and management, and there has also developed efficient Government administrative machinery - still evolving - to assist.

The important features of the coast are obviously the land and the sea. Much of the coastal land consists of fragile sand dunes, with the sandy beaches presenting a seawards buffer from which the sea draws sand in winter and redeposits it in summer. The seawards side is generally in a state of long-term dynamic equilibrium, to be disturbed or dredged at one's peril.

Equally, the first line of sand dunes is often only tenuously retained by marginal vegetation. Overheavy pedestrian use, much less use by off-road vehicles, can cause loss of sand by wind blow that will take years of costly effort to rehabilitate.

GUIDELINE 9:

BEACHFRONT TOURISM DEVELOPMENTS SEPARATED FROM THE SEA BY VEGETATION, SHOULD PLAN LIMITED ACCESS PATHS AND PROVIDE GENTLE CONSTRAINTS OVER OTHER ACCESS.

The dynamic changes in widths of beaches obviously vary with location and the strengths of storms. Because of the occasional winter storm excavating a beach, there has grown up a general non-statutory policy of having a substantial (30-100 metres) set-back of structures, to leave the first line of dunes intact.

GUIDELINE 10:

AS A GENERAL POLICY, SUBJECT TO SPECIFIC SITE DISCUSSIONS, WHERE A DEVELOPMENT IS BASED IN A SAND-DUNE AREA, THERE SHOULD BE A NOMINAL SET-BACK OF 30-100 METRES FROM THE SEAWARDS FIRST LINE OF STABLE VEGETATION.

Flowing from this, naturally, there are advantages to structures built on rock.

There is substantial north-south and south-north movement of sand just off-shore, eg in the SouthWest. The scale and masses of sand involved make any man-made remedial efforts both puny and vastly expensive if an off-shore structure such as a marina is incorrectly located.

A considerable amount of experience has been gained as to these off-shore movements. The Marine and Harbours Department is evolving knowledge of locations along the coast where man-made structures, whether they be groynes or marinas, will have minimal impact on the dynamic natural movements of off-shore sand.

GUIDELINE 11:

A POTENTIAL DEVELOPER OF A MARINA OR THE LIKE SHOULD APPROACH THE MARINE AND HARBOURS DEPARTMENT IN THE FIRST PLACE, TO CHECK SUITABILITY OF A SITE.

The vital element in any such man-made structure is the consideration of yearly maintenance and the need for costly remedial dredging. It cannot be too strongly emphasised that such costs must not devolve upon the Government and thence the community.

Thus if a marina developer, for example, should for some reason find his venture non-viable, and wish to "walk away from it", the community must not be left with a continuing burden of remedial measures. And because the sand movements form partial continua along the coast, the effects may not be completely localised.

It is therefore imperative that the comprehensive body of knowledge being added to by Marine and Harbours be consulted at the outset. It may well be, of course, that further specialised measurements or modelling is necessary to refine details about a site and a design, but that is a fine tuning issue. Similarly, site-specific issues might include retention of sea grass for its value to guard against underwater erosion as well as being a vital element in the local ecology.

For on-shore developments, again there is now a growing body of expertise in State Government and among some consultants. The first point of contact from a planning and technical view is the Coastal Branch of the State Planning Commission.

Responsibility for coastal planning has been taken over from the EPA and passed to the State Planning Commission. It has all responsibility, under present arrangements, for coastal planning and management, having held that role since 1986. ("Coastal Planning and Management in Western Australia, a Government Position Paper", Premier Hon. Brian Burke, M.L.A., October, 1983, and "Country Coastal Planning Policy", State Planning Commission, December, 1987).

It has the usual consultative interdepartmental committee, the Coastal Management Coordinating Committee. This can draw upon individual expertise, such as from the Department of Agriculture for the very sensitive and delicate issues of coastal vegetation, both retention and rehabilitation, as well as new vegetation to add to the landscape appeal.

GUIDELINE 12:

A BEACH FRONT TOURISM DEVELOPMENT SHOULD BE DISCUSSED AT A VERY EARLY STAGE WITH THE COASTAL BRANCH OF THE STATE PLANNING COMMISSION.

The Coastal Branch issued a "Country Coastal Planning Policy" document (December, 1987) which goes into many planning details. There is as yet no comparable document for metropolitan areas.

As far as environmental issues are concerned, that document provides several dozen matters of detail, eg about vegetation, visual appearance and intrusion. These are consistent with, and flesh out, the broad philosophic guidelines of section 2, and therefore there is little point to repeating them here, since the document is publicly available, and obtainable from the State Planning Commission.

Before proceeding we draw attention to the currently in-vogue wave of worry about the greenhouse effect raising seawater levels between some 30 and 200 centimetres over the next century. (The greenhouse effect and the so-called ozone "hole" appear to be flavours of the year.) We have every confidence in the accuracy of the physics that a greenhouse effect actually exists, and that carbon dioxide concentrations are increasing. But it is truly a giant leap forward from that fact to some of the current speculations as to consequences. We are far from convinced of the accuracy of some of the models from which such sea-water levels or climatic predictions have been made. But that is an issue about which each developer will have to seek his own expert guidance. We disclaim any responsibility for any such predictions or their accuracy.

Perhaps most important to a tourism developer is the question of "set-back" from the beach or the sea. Obviously, if a tourist customer can basically step out the "front door" onto the beach and walk straight to the sea, then there is potentially a very attractive situation. There are ample precedents elsewhere.

However, the Western Australian (sandy) coastline is susceptible to occasional very strong erosion during winter storms. There are many examples where the beach has literally been dragged away from almost underneath a structure built too close to the beach.

So the policy has evolved to let Nature give a clue to the long-term stability of a sandy beach, by treating the first line of permanent vegetation as a datum point. Quite often it will be noted that immediately on the seawards side there will be a sharp drop down to the actual beach, indicative of the dynamical to-and-fro sand movements on the seawards side.

The general policy, which is non-statutory, is to set buildings back a nominal 30-100 metres inland from that first stable line of vegetation. We concur with this approach, given that each specific venture can have the details refined with discussion particularly with both the Department of Agriculture (on vegetation stability) and the Marine and Harbours Department (on the beach movements), all coordinated by the above branch of the State Planning Commission.

The argument is often made, and is often valid, that the best way to stabilise the sand is to put a building on it. That will not hold up to putting a building actually on the first line of dunes, simply because the ocean can attack right up to that point and indeed on both sides. So some setback is essential. On the more positive tourism side, we do not see this as a necessary disadvantage, but rather as a long-term safeguard.

GUIDELINE 13:

THERE SHOULD BE NO MAN-MADE STRUCTURES SUCH AS ROADS BETWEEN A TOURIST RESORT AND THE BEACH.

If a road exists already, the developer and appropriate authorities should negotiate to reroute it to the landwards side. It is ridiculous to have a tourism beach resort where one has to cross a road before reaching the beach. The alternative could be using underground access, but that is aesthetically unsatisfactory and is surely not the way that one should be mentally conditioned for a pleasant day on the beach. Besides, the very visual presence of a surface road as a scar on the beach and sea vista is ugly and intrusive.

The above suggestions are consistent with our firm position on the right of public access to any beach (Guideline 8).

Another major environmental problem with coastal tourism developments is that of traffic control and parking facilities. This is a general environmental problem, with more relevance to the community at large rather than only tourism developers.

We have addressed this problem in the past (O'Brien, "Environment and Science", University of Western Australia Press, 1979) and concluded that perhaps special beach commuter buses from conventional inland carparks would be one solution. But that is a broader issue than for this document.

GUIDELINE 14:

ADEQUATE CAR PARKING FACILITIES MUST FORM AN INTRINSIC PART OF THE TOTAL INITIAL PLAN.

Whether these are to be private or jointly developed can be treated on an individual basis as a planning issue, but the matter cannot be ignored environmentally in these guidelines because of its great visual and social impact.

The associated vital issue of road access and joining in with community traffic flow is one that again has to be solved in a totally-integrated manner.

While we do not enter specifically into discussion of the heights of coastal tourism developments, it should be clear from our broad philosophical guidelines that we consider that the scale of such developments should be such as not to pollute visually the beauty of the scene as viewed by the community. The development must be in harmony with its surrounds. Thus if our Guidelines 3 and 6 are followed, one can rest easy.

In fact, it is worth emphasising that a great deal of planning and environmental management will follow directly from adoption of the general "philosophical" guidelines of section 2.

3.2. REMOTE AREAS.

Much of Western Australia is by definition "Remote". (Indeed, Perth itself is remote in the usual sense.) The term is used here to refer to those areas far from settlements of more than a few hundred people, and concentrate on areas with obvious or developing tourism potential. Thus regions like the Kimberley, Bungle Bungles, and the Prince Regent Reserve are included, but not Broome where there is a strong local government presence.

It is also emphasised again that, while we recognise the vital element of Aboriginal land use and traditions in many of these areas, these aspects are so delicate and complex that they must be dealt with as a special and separate issue. (See, for example, "Tourists and the National Estate", F.Gayle and J.M.Jacobs, Australian Government Publishing Service, Canberra, 1987.) It is possible that the current Rudall River analysis may lead to some precedent for a prototype *modus operandi*, but we remain to be convinced as to how pervasive such precedents will be in other areas.

One key to many tourism developments in such remote areas is clearly the modern safari expedition, with the tourists armed with eyes and cameras, hopefully taking away only memories and photos, and treading lightly on the earth during their visit.

Part of the tourism attractions in such areas obviously arises from magnificent scenery on a grand scale. It is scenery that must be travelled through, perhaps in safari style, to be appreciated. Accompanying the scenery, and an intrinsic part of it, are the native flora and fauna.

The purple prose of one advertiser is worth quoting here simply to show the emphasis placed on the natural environment. This advertisement is quoted not necessarily because of its merit, but because it reinforces, perhaps more than most advertisements we have seen, our basic premise about the symbiotic nature of tourism and the environment.

The advertisement (from AAT King's) reads:

"Tropical rainforests, painted deserts, timeless mountain ranges, sculptured canyons, national parks and the land of the "dreamtime". Share the excitement of the day with millions of animals and birds on the oldest land mass in history (sic). Pink cockatoos, red kangaroos, wild dingoes, busy budgerigars, buffaloes, crocodiles, emus, honey-eaters and wild brumbies".

In travelling through remote environments, even those frequented by "busy budgerigars", the overwhelming guideline is to minimise traces of one's visit. The obvious environmental precautions against bushfire damage, unnecessary scrub-bashing, and the like apply.

The concept of mobile camping structures, temporarily installed and then removed with minimum residual traces, is very attractive. To the extent that it is practicable, the old bushwalkers' motto of "Burn, bash and bury" litter can apply, or conceptually it can be carried back for disposition at a civilised rubbish dump.

GUIDELINE 15:

IN TRAVELLING THROUGH REMOTE ENVIRONMENTS ON TOURIST EXPEDITIONS, THE OVERWHELMING GUIDELINE IS TO MINIMISE TRACES OF ONE'S VISIT, SO THAT THE NEXT VISITOR SHOULD BE ABLE TO LOOK AT THE SCENE AND IMAGINE THAT HE IS THE FIRST TO VIEW IT.

Unfortunately, but obviously, the provision of tracks will dilute that illusion, yet the consistent use of the same tracks is imperative to avoid an ultimate cobweb destruction of the natural flora and even, as in the Bungle Bungles, the very fragile terrain itself.

Again we come back to the essential question of whether such environmentally-sensitive areas should be made available only to an elitist few. It would seem best that the safaris should emanate from a single, well-equipped and well-informed coordinating tourism establishment. Whether this is complete with airstrip or helipad for the tourist in a rush is a matter that has to be decided case-by-case, and probably resolved largely on the issue of financial viability.

For the more detailed, non-grand, features of such remote areas, the question arises as to how the wondrous fabric of flora and fauna should be threaded with tourism gold in Western Australia.

There is no doubt about the beauty and uniqueness of many of the animals, including birds and fish, kangaroos, wallabies, numbats and the rest. To these can be added the dolphins of special propinquity at Monkey Mia, as well as wide-ranging whales and narrow-ranging dugongs, game fish and the like.

There can also be no doubt about the uniqueness and beauty of the wildflowers and much of the other flora, some redolent of Gondwanaland, others evolving through the isolation of the State posed at sea by thousands of kilometres of Southern and Indian Ocean - less in the north west by tens of kilometres - and on land by a thousand kilometres of the Nullarbor so-called desert. Clearly these are the dreams of tourists and tourism promoters. But those with visions of emulating the African "Tree Tops" tourism resort in Western Australia are, largely, thinking on the wrong scale.

In most of the flora and fauna of Western Australia, small is beautiful. With wildflowers of the SouthWest, in particular, it is the tourist on foot who, slowly walking and stooping to see close to the ground, will discover more and more tiny and wonderful beauties. With fauna of the SouthWest, it is the patient and keensighted or binocular-equipped tourist who can spot the fast-moving small birds, the shy wallabies and kangaroos - many seen as roadside carcasses in various stages of decay and disrepair - and more rarely, bandicoots and numbats and the like.

This is not to say that there are no large fauna or flora in the State. In the NorthWest, in particular, these can take on scales to suit the vastness, with large crocodiles or boab trees or termite mounds and the like. In the SouthWest, one finds majestic karri trees towering up scores of metres, widespread expanses of jarrah and marri and fewer more localised tuart trees.

But, unlike Timber Tops, the fauna are not generally large and possibly dangerous. The tourist can see a kangaroo in some form or another almost anywhere.

GUIDELINE 16:

MOST REMOTE TOURISM VENTURES CONCERNED WITH NATIVE FLORA AND FAUNA ARE BEST TO PROVIDE FOR SMALL PARTIES AND INTENSE PERSONAL PARTICIPATION.

For example, tourism developments in Class A nature reserves are best left to development by reserves managers, perhaps in providing bird "hides" or other small facilities that can be used also for scientific purposes. Other areas are perhaps best served by short-term tours or on desert or remote safaris.

In remote areas, in addition to the obvious need for local expertise in logistics generally, if the tourist is to fully participate, he will need to be accompanied by local "environmental" experts.

GUIDELINE 17:

TOURISM DEVELOPMENTS IN REMOTE AREAS MUST PROVIDE LOCALLY-KNOWLEDGABLE ENVIRONMENTAL EXPERTS AND GUIDES. STEPS SHOULD BE TAKEN AT APPROPRIATE LEVELS TO TRAIN OR OTHERWISE OBTAIN THE SERVICES OF SUCH EXPERTS.

Such guides are essential often to even sight in on the fauna, or go to appropriate sites, as well as explain both macroscopic and microscopic phenomena.

We avoid resolving here the obvious question as to whether many of these experts should be local aboriginals, as being beyond the scope of these guidelines. Whether these guides should be aboriginals has been under examination for over fifteen years, and it may now be coming to fruition, to possibly mutual benefit of both cultures.

Although to some extent safari-like expeditions may be thought to be elitist, in fact they seem to be approaching ready markets. The fact that a tourism group may be small in number at a given time is no reason to denigrate it, and in fact it is consistent with

GUIDELINE 18:

TOURISTS IN REMOTE AREAS SHOULD "TREAD LIGHTLY ON OUR LAND".

An important synergistic interaction can take place between tourism and the environment on such safaris. If the guide is sufficiently knowledgeable and enthusiastic, the tourist should leave with both a greater knowledge and appreciation, and thence a greater love, for the environment than he previously experienced. It is from the very stuff of such products that one can sustain a community desire for adequate environmental care and management.

The tourism promoter may measure his success by the number of repeat or referral customers. The environmental manager may measure his success by their memories and an increasing community awareness and support. They both are really just measuring different components of a successful tourism development.

3.3. REGIONAL AND URBAN AREAS.

The need for environmental guidelines in regional and urban areas is generally to be met by following some of our broader philosophical guidelines (Section 2), such as empathy with a site, and then simply working with the existing town-planning or local zoning arrangements.

Tourism developments in regional and urban areas generally are fully guided and constrained by existing town plans or other local authority zoning and by-laws. There seems to be some tendency on the part of the EPA to regard some such tourism developments, eg the old Swan Brewery, as "planning" rather than "environmental" issues, and to maintain a hands-off approach to them. Since the definition of "environment" is so broad, we suggest early discussion and resolution with the EPA as to its potential interest in the development, so as to ensure, early on, the extent to which the tourism developer can work solely with the local authority and, of course, service authorities.

Certainly the would-be developer should first approach the local authority for guidance as to whether a potential project needs to be taken up with the EPA. If he wants rezoning of an area, for example, then it is an issue for the local authority.

If his planning desires and those of the local authority are in significant and deadlocked opposition beyond bipartisan negotiation, and matters are taken to the Town Planning Appeal Tribunal or the like, then it is possible that such a third party may "have regard to" environmental views, and seek some advice or evidence from the EPA.

Such legal issues are beyond the scope of these guidelines.

Responsibility for environmental issues affecting urban and regional tourism developments would seem to remain the province in the first place, of the appropriate local authority. That authority can draw on other expertise as appropriate.

The idea has been advanced that, conceptually, each regional or urban area should designate the area(s) it considers should be zoned for tourism development, and after that the issues are purely between the local authority and the tourism developer.

The concept would be that environmental authorities such as the E.P.A. and the State Planning Commission should review the designated site(s), perhaps put some environmental constraints on them, and after that the whole issue is a one-on-one discussion between the local authority and the developer.

We can see a great deal of logistics merit in such an arrangement. Unfortunately, the environmental problems that could result may become more of a regional than a local nature. For example, there may be a call for extra water supplies, which may need to be managed on a regional basis.

If the local authority or the potential developer foresees environmental problems starting to take on regional proportions - and several cases are current - then the obvious recourse is to consult with the State Planning Commission, and possibly with the Regional Director of the Department of the NorthWest and Regional Development. There are also already two Development Authorities - the Great Southern for the Albany area and the SouthWest Development Authority for the Bunbury area.

The extent to which the local authority versus the State Planning Commission should give the final statutory ruling on such development issues is a matter likely to be resolved under the new Planning Bill to be presented to State Parliament in the next session. We cannot discuss it further at this stage.

Similarly, in the case of tourism developments in the vicinity of the Swan and Canning Rivers, there is also new legislation pending to attempt to resolve planning issues that are presently complex because they involve both foreshores and rivers. That legislation should be resolved during the current session. However, it seems likely that the extensive and very useful Waterways Commission guidelines will still be followed broadly, and the administrative procedures for developments simplified and unified. (See, for example, "Draft Swan River Management Strategy", Government of Western Australia, 1987.)

A further useful and public document that gives a great deal of up-to-date information about the Perth Metropolitan area is "Planning for the Future of the Perth Metropolitan Region", a report to the State Planning Commission, November, 1987. Although it necessarily concentrates on planning in the traditional sense, and does not enter into tourism and skirts a little around environment, it has a vast amount of useful forward-planning information that could be of value to future tourism developers.

3.4. FORESTS.

Tourism developments in forestry areas will be predominantly in the delightful SouthWest region of the State, and several cabin-style projects are completed or underway, while another more elaborate semi-residential subdivision incorporating an artificial lake is also under construction.

From an environmental point of view, the guidelines are relatively straightforward, although they will vary a little in detail from site to site.

Forests are under the control generally of the Department of Conservation and Land Management (CALM), which is keen to encourage tourism and multipurpose use of the forested areas. Indeed, its predecessor, the Forests Department, did a great deal of pioneering work for the community in encouraging multipurpose and recreational use of forests, often exceeding its brief to do so, but meeting with relatively little opposition to its efforts in encouraging tourism areas such as the Valley of the Giants, the Rainbow Trail and the like.

It is part of the statutory responsibility of CALM to develop policies to provide facilities for enjoyment of the environment of National Parks (Section 22(1)(b)(i)). Unfortunately under the present Act there is no corresponding responsibility with regard to State Forests, where the statutory aims are directed more towards commercial productivity. However, implicitly the opportunity still exists in the statute for encouragement of multiple use, via the machinery of creating a management plan and using Section 56(1)(a).

The usual environmental guidelines for a tourism development in a forest area can be derived via the expertise of CALM. They could be expected to include common sense provisions against bushfires, provision of multiple recreation facilities such as horse riding, canoeing, bushwalking, mountain or rock climbing and the like.

GUIDELINE 19:

A TOURISM DEVELOPER WISHING TO ESTABLISH A RESORT IN FOREST AREAS OR TIMBER TOWNS UNDER JURISDICTION OF CALM SHOULD CONSULT WITH AND BE GUIDED BY THEM IN ALL ENVIRONMENTAL MATTERS, PRINCIPALLY BECAUSE OF THE DOMINANT CONCERN ABOUT BUSHFIRE CONTROL.

The extensive areas quarantined against dieback would naturally be excluded from tourism developments, and in fact the most promising areas in the SouthWest are in karri forest, relatively free of dieback.

Several of the old abandoned timber towns of the SouthWest are being used for recreational purposes and tourism, and CALM is installing or has installed a number of information bays at popular tourist locations.

As a consequence, a tourism developer in forest areas in the SouthWest has already provided to him a great deal of tourism infrastructure, in provision of alternative tourism attractions, outside his immediate site, to provide the diversity that tourists desire for long term (week or so) diversions.

The environmental details of most tourism resorts in the forests of the SouthWest would largely and routinely be a matter of town planning details to be resolved with the local authority and conservation details to be resolved with CALM, rather than necessarily receiving the attention of the EPA. Accordingly, negotiations could be more flexible and individually attuned.

It is not immediately clear to us how a tourism developer in such forested areas could follow our desire for synergistic interaction or "feedback" into the environment (see section 5), other than in having tourists gain a greater appreciation for the environment, which itself is far from a trivial benefit. But perhaps consideration could be given to establishing an arboretum or the like, as a positive contribution. Such details would necessarily be a matter for negotiation with CALM.

3.5. NATIONAL PARKS.

Many of the most beautiful areas in Western Australia have been designated as National Parks. This places an immediate paradox before a tourism developer, and the Government, as to the extent to which tourism development should occur in these areas. On the one hand tourists want to go there to enjoy the beauty, and so the tourism developer wants to capture that market. On the other hand, the Government designated them National Parks in order to preserve and protect them for present and future generations.

This is a paradox which is largely unresolved to date in Western Australia (but not elsewhere), which we hope to resolve in these Draft Guidelines.

It is useful first to go back a little into the historical development of the present National Parks, as well as into the legislation under which they were designated and are controlled.

There have been "traditional" and much-loved parks such as King's Park and Rottnest Island, John Forrest and Yanchep, relatively close to Perth and considered inviolate for decades. The great "tea-room" controversy about King's Park restaurant serving liquor was a measure of the emotions they can arouse. Yet commercial "service" facilities at Yanchep and John Forrest, more recently at Walyunga and other near metropolitan areas are accepted for their intent, viz to help people enjoy the areas.

But when one gets to the country areas, where the parks are likely to be larger, less occupied, and in a more natural state with less evidence of there being other humans in the universe, a different mood can prevail amongst some people about prospective tourism development.

No doubt this feeling is exacerbated by the long-standing and seemingly endless dispute as to whether mining exploration and perhaps mining can or should take place in these parks. We do not enter into the mining controversy here, although we certainly have done so elsewhere.

Here we maintain that responsible tourism development in some National Parks should be encouraged. We give reasons for this advocacy. There is also ample overseas and Australian precedent.

It is important to appreciate that the total area of National Parks in Western Australia was about 1.5 million hectares in 1971, but after the various EPA studies of the mid-seventies, it jumped to about three times that area, viz 4.5 million hectares, and it has remained reasonably constant since then. In other words, most of the larger beauty spots are now in National Parks.

In the foreword(s) to our recommendations to increase the size and number of National Parks, we repeatedly stressed the theme that "Parks are for People". We do not resile from that position.

In the mid -seventies, National Parks were controlled by a Board within the Lands Department. In 1976, we assisted in drafting the Bill that led to creation of the National Parks Authority, a body directly responsible to the Minister for Conservation and Environment. So the emphasis was shifted to environmental issues. But again in that legislation and in appropriate debate the point was made repeatedly that "Parks are for People."

In the more recent Conservation and Land Management Act (1984) the point was not lost. Section 22(1)(b) has as a function of the National Parks and Nature Conservation Authority the development of policies

"for the preservation of the natural environment of the State and the provision of facilities for enjoyment of that environment by the community."

We see that responsible tourism developments in selected National Parks can only serve to further these aims, developed over the years. We see furthermore that with the present era of easier travel and greater leisure time yet a more frenetic world, such solace as Nature can provide will be sought with ever-increasing intensity and need. (We deal below with the extent to which marketable tourism can afford to provide short-term versus the more economically viable longer-term "solace".)

GUIDELINE 20:

A RESPONSIBLE TOURISM DEVELOPMENT SHOULD BE PERMITTED WITHIN A NATIONAL PARK WHERE ITS DEVELOPMENT CAN ENHANCE COMMUNITY ENJOYMENT OF THAT PARK AND USEFULLY EXTEND THE SOLACE OFFERED BY THE NATURAL BEAUTIES AND CONSERVATION FEATURES, WITHOUT DETRACTING FROM THOSE FEATURES.

We discuss below the logistics such as whether such a development should be leased, etc, but regard Guideline 20 as fundamental on which agreement in principle must first be reached.

An outstanding problem that has plagued National Parks in Western Australia (and of course many other places) is that of limited manpower and resources for management. Not only are there fundamental problems such as bushfire control, with repeated antagonism of farmers in surrounding lands who feel threatened by uncontrolled fires. There are also the problems of safety - of finding lost walkers -, of controlling internal traffic, of litter and camping control, even of control and exclusion of dogs (an issue we find ridiculous for many of the outlying parks where the family pet, on a leash, is a fundamental part of a country family's seaside holiday).

One solution to the problem of limited management manpower seems to be a proliferation of signs in National Parks saying "Don't do this" or "Don't do that". We feel very strongly that the whole philosophy of National Parks has to be turned around into a positive affirmation of Nature, and that signs should be proactive not reactive. They should guide, encourage and inform, and add to enjoyment. They should also be unobtrusive and minimum in number, but that is a separate issue.

The present largely-defensive and intrusive posture could be improved if there were more personnel on hand ready and willing to assist in enjoyment of the National Parks. While many individuals and the senior-level management in the Conservation and Land Management (CALM) Department are anxious for this to occur, their duties are largely regulatory and their facilities limited.

Therefore, what is needed is an entrepreneurial approach, by developers who are profit-motivated but who can make a profit only if they make the National Parks enjoyable and refreshing.

It is in their own interests to follow Guideline 3., "Don't foul your own nest", or they will deplete their own profits by losing "customers" - not only repeat customers but also potential new customers because they will develop a poor reputation.

There are many technical problems in such tourism developments, such as the various conflicts as to whether land should be released under conditional purchase arrangements, or under long-term lease with strict environmental and management conditions. Other factors include whether selected employees should be designated rangers under the CALM Act. We do not see any such problem as insuperable, and it may well be that they should be dealt with on a case-by-case basis, because the nature of the park and the tourism development may vary so greatly.

Some policies that should be followed are consistent with the broad Guidelines of section 2. Whatever the tourism development may be, it should be such that:

GUIDELINE 21:

- i) IT MUST NOT DETRACT FROM ENJOYMENT OF THE PARK BY THE GENERAL COMMUNITY;
- ii) IT MUST CONTRIBUTE, IN CASH OR IN KIND, TO THE ORDERLY OPERATION AND MAINTAINANCE OF THE PARK;
- iii) IT MUST BE COMPATIBLE IN SCALE, ARCHITECTURE AND GENERAL "MOOD" WITH THE WHOLE ETHOS OF THE PARK;
- iv) THERE MUST BE SOME BOND AND OTHER CONTRACTUAL AGREEMENT TO ENSURE THAT IT DOES NOT DEGRADE IN TIME SO AS TO DETRACT FROM THE PARK;
- v) IT MUST BE SO LOCATED THAT ITS PHYSICAL EXISTENCE DOES NOT DETRACT FROM THE ETHOS OF THE PARK;
- vi) TO THE EXTENT PRACTICABLE, THE DEVELOPER AND THE GOVERNMENT SHOULD JOINTLY PLAN AUXILIARY SERVICES, ROADS, TOILETS ETC,
- vii) THE DEVELOPER SHOULD ACTIVELY ASSIST IN OBTAINING AND SPREADING EXPERT KNOWLEDGE ABOUT THE ENVIRONMENTAL DELIGHTS OF THE PARK.

One major problem for the developer will be the marketability of his resort unless he is able to provide some diversity of entertainment over and above the natural features of the park itself. Strange as it may seem, even alongside the beauties and variety of a lovely beach and coastline, one finds that people want to play tennis, or bounce on trampolines, or the like. Most developers then would tend to try to attract a longer staying clientele, by extending or diversifying their resort, to avoid the clientele becoming bored with the National Park, or to deal with wet or windy weather conditions which would restrict outside movement within the National Park.

Frankly, our attitude would be that this would be the developer's problem, except for the fact that many may not realise it at the outset, and may want to add such auxiliary facilities later, in an attempt to make their project more viable.

GUIDELINE 22:

IT IS THEREFORE IMPERATIVE THAT, BEFORE ANY APPROVAL IS GIVEN TO A TOURISM DEVELOPMENT IN A NATIONAL PARK, AN IRREVOCABLE LONG-TERM CONTRACT BE ESTABLISHED, SAY WITH A FIVE YEAR TERM, WHOSE CONDITIONS CAN ONLY BE VARIED BY AGREEMENT SAY, BY BOTH HOUSES OF PARLIAMENT.

This is, of course, the present safeguard for Class A reserves.

However, as against this apparent harshness, the Government in its turn has to acknowledge that many boundaries of National Parks are not environmentally sacrosanct. In most cases, the boundaries came about to encompass something special, but then the lines drawn on the appropriate map are most likely to follow old pastoral lease lines, or some cadastral rather than environmental feature.

So in some cases, while still leaving adequate buffer zones, excisions might be made for tourism developments without prejudice to the park and Guideline 21. In any case, whether the tourism development is to be inside or outside the park, the Government initially at least should permit a tourism development only under a lease. Whether it is a conditional lease, or what terms it contains, can be judged on a case-by-case basis on the recommendation of CALM.

It would seem that there is material room for trade-off without any environmental degradation at all.

These Guidelines and the general theme are put forward with the full awareness that they may not receive enthusiastic endorsement from some groups or individuals.

Nevertheless, there is ample precedent interstate and overseas for tourism developments in National Parks. Furthermore, the National Parks were created in the first place for people to enjoy them - special "conservation" areas are quite separate and different and are set aside as Nature Reserves to preserve particular species of flora and fauna and to maintain genetic diversity. We repeat that "National Parks are for people."

If tourism developments can help more people enjoy the National Parks, can assist in their management in cash or in kind, can proselytize them and use them to extend community understanding of the environment, can use them to earn tourist dollars, can use them to have other people grow to love Australia a little more, can help maintain and care for them, can have people compare them with their own National Parks so that there is an improved exchange of information, can assist in training more environmental guides and managers and custodians, then frankly we cannot see grounds for objection provided the given Guidelines are followed.

3.6. OTHER AREAS

Besides the types of areas listed earlier for potential tourism development, the remainder of the State has a number of categories of areas that are or could be attractive to tourists.

The Tourism Commission is developing a list of prime sites for tourism development, and with the new Government approach to deferral of headworks charges and other incentives such as expediting the administrative processes of release of Crown Land, there is an increasing professionalism in dealing with the expectations of tourism developers, and in giving them guidance and incentive for responsible developments.

In addition, what is of very great importance is that environmental and planning management is slowly maturing in Western Australia, to the point where in several categories of land we can direct the reader's attention immediately to published guidelines that already have varying levels of authoritative backing.

These are discussed in more detail in section 6, but, briefly, there are now extensive guidelines for both wetlands and country coastal areas, there are several regional planning documents issued by the State Planning Commission, there are several Tourism Development plans for various areas, there are policy documents for canal developments and for the Swan and Canning Rivers, and so on.

These documents are far too detailed and voluminous to regurgitate here, and besides they deal with far more than just tourism developments. But they are an indication of a growing body of reasonably authoritative specific plans (see section 6).

Here we wish to concentrate first on two categories of other areas which are of great interest, viz pastoral areas and the Swan-Canning River areas. These are subject to pending new legislation. We will then discuss some other general areas.

There are current expectations of new legislation in the 1988 Autumn session of Parliament to revise the statutory details of control of both pastoral and the Swan/Canning areas. Therefore comments here are necessarily somewhat curtailed, but unlikely to change other than to be expanded after legislation is passed.

The vast areas traditionally thrown open to pastoral use include some magnificent scenic areas of great potential attraction to tourism. Perhaps nowhere is this more true than in the area of Shark Bay, where pastoral leases reach to the magnificent shorelines, and where scientific interests and wonderful fishing opportunities abound.

The EPA addressed the Shark Bay question in its extensive "Red Book" recommendations in 1975, which were all accepted by the then State Cabinet ("Conservation Reserves for Western Australia, Systems 4,8,9,10,11,12", December, 1975).

The thrust of our recommendations with respect to pastoral leases in the Peron-Nanga area was that the Department of Lands and Surveys (now Dept. of Land Administration) be requested that attempts should be made to purchase leases in the Peron-Nanga area should they come on the market, thus facilitating...a National Park."

The area has now boomed as a tourism attraction, coupled with growing fishing appreciation of areas like Steep Point, and the very strong promotion of the dolphin attractions at Monkey Mia. The Denham road has been sealed, thus increasing tourism flow, but this took place before the area was prepared to receive the additional tourism pressure.

There is currently great controversy over the area, and what the role of pastoral leases should be. This document is not the place to pursue this. However, we cannot refrain from expressing regret that the Cabinet decisions following on the EPA recommendations some 13 years ago were not fully implemented quickly, which could have forestalled many of the current disputes.

It is further important to note that, in its Foreword to that Red Book, the EPA explicitly did not endorse a "land grab", and we gave cogent and still-current reasons for that position.

An extensive report into the Shark Bay area was completed recently as part of an EPA comment on State Planning Commission and CALM report and recommendations for the area. The EPA document ("Implications of the Shark Bay Region Plan for Conservation in System 9, Report and Recommendations of the EPA", Bulletin 305, November, 1987) sought to review the joint SPC-CALM report of March, 1987 entitled "Shark Bay Region Plan" in the light of the historical Red Book (1975) and updated material.

The recent EPA Bulletin very vigorously opposes continued pastoralism in the Shark Bay area on the grounds that it is intended for a conservation reserve and "Conservation reserves and pastoralism are not compatible". This is not the document to debate such issues. However, it is important to note the vigour with which the Government agencies differed in their approach to pastoral land in this conservation-rich and environmentally sensitive area.

The issues have now been partially resolved in a new region plan. There will undeniably be continued tourism pressure on what is one of the most alluring and environmentally-sensitive areas in Western Australia, and the brief historical summary given above will be needed for future developers more than an attempt here to provide a few environmental guidelines.

We emphasise that the general guidelines of Section 2, although anthropocentric, must still apply.

We should also add that the Tourism Commission had an input into planning of the area through its "Tourism Development Plan, Gascoyne Region", June, 1986. Many of the recommendations are still pertinent, but the present machinery processes in Government now have the State Planning Commission, CALM and the EPA as major players in the game and even occasional competitors. This aspect is discussed in more detail in Section 6, and while it is not strictly part of the Terms of Reference, it is a situation which is certainly inimical to rational environmental planning of tourism (or many other) developments.

The role of pastoral properties in tourism has been examined extensively in 1987/8 by an interdepartmental committee chaired by Mr K. McIver. That committee treated primarily the administrative machinery for dealing with three levels of proposed tourism development, viz low key, medium and large scale, which are self-explanatory. They range from i) overnight stops, to ii) small caravan park/camping areas to iii) extensive developments, which would be separate from a pastoral lease.

Clearly the environmental importance of these categories rises until the third development might warrant the need for formal EPA approval. However the guidelines would probably amount to little more than the previously-applicable Pastoral Board guidelines, aimed at protecting the integrity of the soils and land forms, coupled with additional guidelines to protect the shoreline from excessive human pressure. Again the details would need to be pursued for specific sites.

GUIDELINE 23:

THE VARIOUS CATEGORIES OF POSSIBLE TOURISM DEVELOPMENTS ON PASTORAL LEASES SHOULD FOLLOW THE GUIDELINES AND ADMINISTRATIVE PROCEDURES EVOLVED BY THE MCIVER COMMITTEE IN 1988.

The Swan-Canning River areas have long been a conflict area, and environmentally are very sensitive, both on the water and the foreshores. A recent very extensive report "Swan-Canning Estuarine System, Environment, Use and the Future", by B.H.Thurlow, J.Chambers and V.V.Klemm, for the Waterways Commission, Report No.9, 1986) explores some of these factors.

The 463-page report goes into considerable local detail. Section 2 of Chapter 11 explores tourism aspects, perhaps in a slightly academic manner, but because of the intensity of pressure on this resource we paraphrase some of the considerations that it was felt should be included in appraisal of tourism projects. Further, because of the extensive amount of work carried out by Thurlow et al and the high degree of public exposure of that work already, we will adopt their work, for these draft guidelines as

GUIDELINE 24:

- i) THE SWAN RIVER IS TO BE PROMOTED AS A CLEAN AND PICTURESQUE RIVER
- ii) THE DEVELOPMENT SHOULD NOT DETRACT FROM THE PICTURE
- iii) THE DEVELOPMENT SHOULD HAVE SPECIAL QUALITIES AND AUTHENTICITY (sic) IN RELATION TO THE RIVER ENVIRONMENT
- iv) THERE SHOULD BE SUFFICIENT "CONTROLS" TO ENSURE THAT THE NATURAL AND INHERENT QUALITIES OF THE RIVER ENVIRONMENT ARE NOT LOST OR DESTROYED THROUGH OVER-EXPLOITATION OF THE RESOURCE.

It will be noted that these are consistent with the broad "philosophical" guidelines of section 2 herein.

The forthcoming legislation to set up a new statutory body for these rivers and their foreshores will address such matters, and it would be out of place to pursue the issue further here. The complexities of a metropolitan river statutory body having control of the water and, to an extent, the foreshores, vis-a-vis the perceived responsibilities of local authorities, are ones that we have wrestled with in tabled legislation in 1973 and in the Waterways Conservation Act 1976, and they are not underestimated.

An extremely useful and detailed document for potential tourism developers in the Swan/Canning, the Peel/Harvey or the Leschenault Inlet areas is the summary "Waterways Commission, Policy Document", Waterways Commission Report No.10, 1986, with updates. It goes into considerable detail for each area, and is applicable even to very small-scale developments.

One of the continued outgrowths of the competition for water recreation in the crowded metropolitan areas has been the continued call for release of some of the public reservoirs in the Darling Ranges for recreational purposes, on the water.

Resisted for many years by the economically-constrained Metropolitan Water Supply, Sewerage and Drainage Board, such recreational use was opposed on the grounds of necessary water purity issues, and the costs of added chlorination and treatment to overcome consequential expected pollution problems.

Reviews associated with the System 6 study, and a subsequent analysis by the Water Resources Council ("Recreation on Reservoirs and Catchments in W.A.", WA Water Resources Council Publication 1/85, July, 1985) have changed this approach.

In recognition of the intense demand for recreational uses of some Darling Range water areas, the Water Authority now authorises the recreational use of selected reservoirs where the water is used for irrigation purposes.

Currently, Waroona Dam and Logue Brook Dam are open for boating, fishing and water skiing, etc. Also, with construction of the Harris River Dam for domestic water supplies and release of the Wellington Dam for irrigation purposes, an analysis is underway as to how best to use it, inter alia, for recreational purposes.

The Water Authority is drawing up individual management plans for various catchments, using 12 guidelines, having recognised that an attempt to have a generalised management plan is far too inflexible. For our draft guidelines, we therefore suggest:

GUIDELINE 25:

THE 12 GUIDELINES DRAWN UP BY THE WATER RESOURCES COUNCIL (PUBLICATION 1/85, JULY, 1985) FOR MANAGEMENT PLANS OF RESERVOIR AND CATCHMENT AREAS SHOULD BE USED AS MODELS BY POSSIBLE TOURISM DEVELOPERS WISHING TO EXPLOIT THE POSSIBLE TOURIST POTENTIAL FOR RECREATIONAL USE OF DARLING RANGE RESERVOIRS.

The prime tourism opportunities exist, as already implicitly stated, on reservoirs where the water is used purely for irrigation purposes.

Another prime area of tourism attraction is the growing number of canal establishments. While these have grown principally around the resort town of Mandurah, one realistically can expect attempts to have them extended at other sites.

From an environmental viewpoint, the initial canal developments at Yunderup in 1970 gave rise to a great deal of concern, and rightly so, since environmental knowledge of the whole Peel Inlet and environs was very primitive at that time. It is probably fair to say that the earliest choice of Yunderup led to a great deal of environmental prejudice against later developers a decade or so afterwards.

However, with subsequent research into the circulation and other environmental aspects of the Peel area, there has been evolved a considerable body of environmental knowledge. It is still fundamentally base-line knowledge, and its capability for accurate environmental predictions is not fully tested.

However, there have evolved, more or less in parallel, several environmental and planning guidelines for canal developments. As a result of Cabinet deliberations over continued controversy about several proposed canal developments, a Steering Committee produced a document entitled "Recommendations for the Development of Canal Estates", available from the Waterways Commission.

First produced in 1981, this was subsequently amended twice, with the current edition dated June, 1984. These useful guidelines include not only the environmental and planning requirements, but also current procedures to be followed in seeking approvals. There is a distinct possibility that some of these procedures may be modified after the 1988 Autumn session of Parliament, but they give a useful baseline.

However, again it would be foolish to ignore here the vast amount of deliberation and debate, and the field testing, that have gone into these recommendations. Therefore, recognising still that this document is presenting guidelines in draft form only, we put forward the June, 1984 recommendations as a general guideline. While they deal with more than just environmental issues, so too must a potential developer, and they form a useful composite document.

GUIDELINE 26:

TOURISM DEVELOPERS CONSIDERING CANAL DEVELOPMENTS, SHOULD LOOK IN THE FIRST PLACE TO THE DOCUMENT "RECOMMENDATIONS FOR THE DEVELOPMENT OF CANAL ESTATES", AVAILABLE FROM THE WATERWAYS COMMISSION, AND ALSO HOLD EARLY DISCUSSIONS WITH THE DEPARTMENT OF MARINE AND HARBOURS.

Another popular tourism area is the category of tourism developments involving caravan parks. This whole area, also, has been under extensive review, with a multi-representative report to Government likely to result in some amended Regulations.

The principal tourism impact of current developments of caravan parks is the increasing tendency for semipermanent dwellers to take up spaces formerly regarded as available to transient tourist travellers. However, there is little that a document on environmental guidelines can contribute to what is virtually a conflict situation involving proprietors, local authorities and the Department of Land Administration.

Another potential tourism area, as yet little explored in Western Australia but active in Queensland, concerns off-shore tourism facilities, the so-called "floating hotel".

If such were to be proposed for Western Australia, one can only suppose that it would be for a location near and inside the Ningaloo Reef, both for safety and scenic/recreational purposes. A comparative project might be the Fitzroy Reef project in Queensland.

If that were to be the case, the environmental implications would be considerable. Having such a heavy localised "load" on the delicate reef environment would require very careful analysis, as would the questions of transport to and from shore, the shore-loading facilities, the waste disposal and so on.

While such problems are not necessarily insuperable, and an optimum site no doubt could be chosen, we would regard it as imperative that a full Environmental Review and Management Programme would need to be initiated well before any firm commitments were made by any party.

Finally, we make brief comment on the important role of tourism buses, carrying people around the State and the country to revel in new environments. The popular Wildflower tours are a specific local example.

We would wish these to be strongly encouraged, even though - or perhaps because - the participants are often elderly and retired persons. Not only should they get the opportunities to delight in the variety and beauties of our environment, but it is certain that they will spin-off that delight into the community at large, whether it be to family and grandchildren or just to "the neighbours". It is that fundamental rejoicing in the environment that will ultimately prove more effective for sensible environmental management than the most draconian and administratively complex legislation.

It is imperative that tourist bus drivers be suitably knowledgeable, and we commend CALM's efforts in this direction. We would go further and urge the tourism operators to provide incentives for their bus drivers and operators to become more aware and familiar with the delights - and the facts - about the environments through which they will travel. Whether this would take the form of some diploma-like recognition or other certification we leave to the operators and CALM to resolve. Here we merely provide a further draft guideline.

GUIDELINE 27:

TOURIST BUS DRIVERS AND RELATED OPERATORS SHOULD BE ACTIVELY ENCOURAGED AND PROVIDED WITH OPPORTUNITIES AND INCENTIVES TO BECOME ACCURATELY AWARE IN DETAIL OF CONSERVATION AND THE ENVIRONMENT THROUGH WHICH THEY TRAVEL. THEY SHOULD BE PROVIDED WITH ADEQUATE SUPPORT MATERIAL IN THE FORM OF PAMPHLETS OR THE LIKE SO THAT THEIR PASSENGERS CAN SHARE IN THE DELIGHTS OF THE ENVIRONMENT, SO THAT THE DRIVERS CAN RESPOND ACCURATELY TO QUESTIONS, SO THAT THEY CAN FIND AND IDENTIFY SUCH DELIGHTS, AND GENERALLY ACT AS ENVIRONMENTAL AMBASSADORS AT LARGE.

4. ECONOMIC IMPLICATIONS OF ENVIRONMENTAL CONSTRAINTS.

In the course of this project, we have become even more aware of the imposition of economic liabilities on tourism developers by virtue of occasionally erratically imposed environmental constraints or more particularly, delays through environmental uncertainties or processes. We have previously argued in favour of allocating some 2-5% of capital costs to what we call "environmental overhead", and we find little resistance or disagreement to that notion.

But we have found numerous unnecessary costs, with the major effect because of time delays caused by environmental and planning approval procedures dragging on. Consequential holding costs in a few projects we examined can average some \$5,000 per day, with delays ranging from months to two years.

The heavy work load on environmental arms of Government is appreciated, but any costs incurred by the developer are necessarily passed on, in the end, to the community.

It is not the purpose of this document, of course, to act as a guide to marketing tourism developments or the like. But just as it tries to set down environmental guidelines for tourism developments, so it seems only appropriate that it should indicate to environmental decision-makers where they could usefully assist tourism developers without over-scrupulous and sometimes even Inquisitional behaviour in their environmental management.

One such particular and very contentious issue is in coastal or beach developments, and we treated those in Section 3.1.

As a general principle, it is imperative that guidelines, whether for wetlands or coastal or pastoral areas, be treated simply as guidelines. They are not carved in stone, but neither should they be disregarded lightly. They are basically first principles, not axioms. They are intended to give a first broad-brush analysis, so that a "first cut" may be made at planning and resort site selection. They can also be used, at a particular site, in identifying portions of high versus low environmental sensitivity, so that one can start preliminary design priorities.

But, bearing in mind the vastness of Western Australia, the same principles that one might want to copy from Long Island or the Gold Coast (perish the thought) should not be photocopied and applied in Western Australia willy nilly and without regard to a specific site. Every site deserves a specific examination.

Yet sometimes a project or concept may be rejected, without examination, and generally at a junior level, for no other reason than that it does not meet THE guidelines.

As a wise businessman said: "In a bureaucracy there are plenty of people who can say no, but unfortunately very few who can say yes."

It is all too easy to raise, and then continue to raise afresh, environmental and planning obstacles in matters of detail, without regard to the greater good. By "the greater good" we mean a project that can include enhancement of the environment, added facilities for its greater enjoyment, greater research and learning opportunities, and the injection into the population of the essence of joy in the environment which itself is a self-perpetuating and growing element for current and future generations.

One would like to see above the portals of environmental offices parts of Schiller's Ode to Joy, instead of the usual "Lasciate ogni speranza, voi ch' entrate." ("The Divine Comedy: The Inferno", Dante Alighieri, Canto 3, circa 1310.)

This is not to be interpreted in any way as a plea to lessen environmental scrutiny and safeguards. Nor is it a plea for unfettered tourism development. Rather it is a plea that environmental bureaucrats, including planners, work proactively with responsible tourism developers so that in fact the end result is a synergistic, magic enhancement of the environment.

Otherwise, as we have found in many instances, not only is there a polarisation of potential antagonism between developers and Government - to neither party's advantage - but the additional delays deter future possibly exciting tourism developments with their environmental spin-off. Those developers who persist in the face of repeated delays simply pass their additional costs on to the end-point consumer, the community at large, to nobody's benefit. They also, incidentally, will have less to donate to what we call an "environmental overhead", which might be in the form of creative and informative environmental brochures, more sensitive sign-posting and the like.

There is also the real-world possibility that a desperate developer might be led to either ride rough shod over sensible environmental planning or else go for short-term returns rather than long-term harmonious plans.

So a useful guideline for environmental managers would be:

GUIDELINE 28:

WITHOUT DIMINISHING ENVIRONMENTAL SAFEGUARDS, WORK PROACTIVELY WITH RESPONSIBLE TOURISM DEVELOPERS. EXAMINE EACH SITE ON ITS SPECIFIC ENVIRONMENTAL CHARACTERISTICS GIVING DUE BUT NOT INFLEXIBLE REGARD TO APPROPRIATE GUIDELINES, WITH THE POSITIVE LONG-TERM GOAL OF ENHANCING THE ENVIRONMENT WITH A SYMPATHETIC TOURISM DEVELOPMENT.

Having stated that guideline itself, we would add first that it seems to be very often observed already. It is just that the exceptions stand out like a wart on a beautiful woman's nose. Second, if the guidelines themselves are of a statutory nature, then there is no immediate discretionary flexibility for either party.

In dealing in this Section with economic realities, it would seem as well to refer briefly to historic or heritage buildings and sites. There is presently before State Parliament legislation to deal specifically with "Heritage" issues, and it would be inappropriate to present formal guidelines here.

However, tourism developers who may be faced with such issues in the near-future would be well advised to seek professional advice from groups such as the National Trust. In particular, there are long-established tourism ventures centred on restored heritage sites such as Greenough, where tourism and heritage can be synergistic.

5. SYNERGISM OF TOURISM AND ENVIRONMENT.

Apart from the artificial man-made tourism attractions such as racetracks or casinos, the greatest tourism attractions are directed towards areas of natural beauty, or the lure of challenges with nature - as in fishing or rock-climbing or underwater diving - or into viewing the bizarre in nature. Of course, what we might call bizarre is generally just an unusually strong development in nature - a "natural bridge" at Albany, or an inland "Wave Rock" at Hyden, or a set of gorges at Kalbarri or Wittenoom.

In all these cases it is Nature that is the tourism attraction.

And the tourist quite properly does not want to see man's heavy-handed intrusion into his view of "Nature". He wants to relate to the pristine world, he wants to "get back to Nature" as nearly as possible, perhaps to satisfy some primitive instinct, perhaps simply because many man-made intrusions are ugly, out of place and offences in the context of the beauty of the natural environment. He wants to commune with Nature, to recharge his batteries, to dream.

Yet most tourists also want convenient road access, clean toilet facilities, fresh water, possibly permanent barbeque structures, and all the rest of the modern creature comforts, not the least being a pillow and comfortable bed at night.

So one has to match the two apparently contradictory requirements of unspoiled Nature on the one hand and modern facilities, services and creature comforts on the other.

We maintain very strongly that, with proper design and guidelines, far from being antagonistic to each other, these two features can be symbiotic, i.e. can live comfortably together.

We go further, and maintain that they can be synergistic, i.e. that in combination the result can be greater or more beautiful or more rewarding and enjoyable than the mere sum of their parts.

GUIDELINE 29:

EVERY TOURISM DEVELOPMENT THAT RELIES ON NATURAL ENVIRONMENTAL FEATURES SHOULD BE DESIGNED SO AS TO EMPHASISE, AS FAR AS PRACTICABLE, THE HIGHEST DEGREE OF SYNERGISM WITH THOSE NATURAL FEATURES.

One of the greatest economic problems facing Governmental managers of beauty spots is simply supplying management and elementary facilities. For years in Western Australia there has been a lamentable deficiency in park management, even in such elements as bushfire control or litter supervision and collection. The taxpayer has limits to the amount he can contribute for such purposes, which are often not highly vote-catching, and few beauty spots are presently self-financing.

Yet a tourism developer, one of whose major aims is profit, is going to work hard to attract paying customers. He knows that he must make his resort attractive, otherwise he loses or fails to attract customers. His reputation will be put in jeopardy unless the services are good. His job is to attract people, whereas Government agencies, at least traditionally, merely tolerate them. The proliferation of National Park signs saying what you cannot do is enough to make the point, although this is gradually changing, with "Walkers Welcome, but Not Cars" and the like.

One of the hardest parts of managing the environment is trying to stop tourists "loving the environment to death".

Tourists love to go to beautiful spots, but if too many go in an uncontrolled way, their heavy-footed pressure can destroy the very attractions that enticed them there in the first place. The environmental damage may be very costly and slow to repair, or even irreparable.

With more leisure time, mobility and good roads, tourists are increasing pressure on environmental beauty spots in numbers increasing at rates almost ten times faster than the population growth rate. Tourism is a booming industry in many places. It is an acknowledged growth industry in Western Australia, but not yet in Queensland's entrepreneurial league.

Tourists want to go to see, and enjoy, natural beauty spots where, too often, the environment is in a delicate balance which their heavy-footed presence can overturn. Too many tourists can overload the "carrying capacity" of a natural area of beauty. A balance between the tourism catering capacity and the environmental carrying capacity has to be achieved.

GUIDELINE 30:

THE SIZE AND SCALE OF A TOURISM RESORT NEED TO BE PLANNED CAREFULLY WITH THE ENVIRONMENT AS A CRITICAL LIMITING COMPONENT RIGHT FROM THE OUTSET, SO AS TO ENSURE THAT EVEN IN ITS FINAL FORM IT DOES NOT EXCEED THE CARRYING CAPACITY OF THE LOCAL ENVIRONMENT.

We must obviously look at the type and intensity of tourism (4-wheel driving, photographing, safari tours, resort hotels, walking etc) and how to design and locate tourist amenities (such as toilet blocks, signs and trash cans), so as not to spoil the very mood of a beautiful place, as well as its sparkling waters or its fragile sand dunes.

One of the very first stages of design of a resort, once the general site is chosen, must be for the architect, with environmental guidance, to select locations where different intensities of use, or no use, can occur.

Possibly one of the best examples where we are at risk of "loving the environment to death" is Monkey Mia. This is said to be the only place in the world where a group of dolphins interact with humans in a natural, untrammelled environment. It is absolutely delightful, but the Denham road was sealed and tourism pressures increased, before total environment/tourism plans were in place.

If we don't make sure that tourism and environment work together at Monkey Mia and Shark Bay, the delightful dolphins may decide they've had too much of meddlesome tourists, and, having studied us enough, leave for greener pastures. We, if not the dolphins, would suffer a great loss.

We discuss Denham separately as a case study in section 7.2.

Those responsible for tourism development and those responsible for conservation and environmental management know that tourism and the environment must co-exist. If the environment that enticed tourists is damaged by them through numbers or the intensity with which they interact physically with the environment, everyone loses.

This seems obvious, but it has only recently begun to be analysed broadly. These Draft environmental guidelines for tourism developments seem to be the first such analysis in Australia.

Income from tourism could offer major assistance in management and protection of the environment and of National Parks. The complaint that there is not enough money being given to skilled management of reserved areas is a long standing one. There are many pulls on the public purse; there has to be a supplementary source of funds for management, and many see one in the tourism dollar.

Such income can come partly from entrance fees to the near-metropolitan and very heavily-used parks, like Yanchep and John Forrest. Last year, visitors in about 90,000 cars paid over \$350,000 to use these two parks. In more remote parks, less heavily used, entrance fees seem unnecessary and would be uneconomic and impracticable to collect.

Responsible tourism developments could be encouraged in some reserves and then required to help environmental management in cash or in kind. Design and architecture of such developments must be in scale and harmony with the natural environment. They can increase the environmental value of sites, with brochures or information boards, or by having knowledgeable staff.

A tourism developer wanting to locate his project where his paying tourists can get the best view must take account of the needs of all members of the community using the area. The infrastructure developed for the resort, (eg roads, water supplies, toilets) may be of benefit to many but may also inhibit other community activities. Some trade-off may have to be made.

In dozens of discussions with tourism developers and Government officers, there is a common acceptance of the theme that tourism and environment should be symbiotic - existing together in harmony- or even synergistic - where the two taken together are greater or more effective than they are when treated separately or individually.

Despite Western Australia's more than 2 million square kilometres of land and over 12,000 kilometres of coastline and only a million and a half residents there is pressure and overcrowding at some popular resorts, and the call for more to be developed.

To date, WA tourism developments have been fairly modest in size but soon the entrepreneurs eager for massive tourism developments, may move in. They will want results quickly, and they will want "fast track" decisions within the machinery of Government. Governments will be under pressure to put notches on their achievement belts and to lay out a "fast track". This is both understandable and inevitable.

However, it is always more expensive to correct environmental damage than it is to protect the environment from damage. It is essential, and cost effective, to have adequate environmental protection and subsequent management right from the outset.

GUIDELINE 31:

IT IS THE RESPONSIBILITY OF THE DEVELOPER (IN HIS OWN BEST INTERESTS) AND THE GOVERNMENT (ON BEHALF OF THE COMMUNITY) TO ACCEPT THE POTENTIAL SYNERGISM OF TOURISM AND ENVIRONMENT, AND, ACTING TOGETHER ON BEHALF OF THE COMMUNITY, TO WORK PROACTIVELY, NOT REACTIVELY, TOWARDS RESPONSIBLE TOURISM DEVELOPMENTS.

On the positive side, environmentally-sensitive tourism can lead indirectly to greater conservation and environmental protection. Appreciation of the beauties of the spots visited and enjoyment of them can cause a higher level of awareness in the community and thus to a greater support of conservation. Various public awareness programs of relevant authorities are to be encouraged, including the prosaic but important aspect of increasing rapport with tourist bus drivers, discussed previously.

With increasing leisure time, there is a growing congregation of tourists who want more professional and technical knowledge about the environment which they are experiencing. Attractive and informative brochures are keenly sought, and will be paid for. Their production is a Value-added tourism development in itself.

GUIDELINE 32:

PRODUCTION OF ACCURATE INFORMATIVE BROCHURES ON ENVIRONMENTAL MATTERS IN AN AREA IS TO BE ENCOURAGED, BUT THE PRODUCTION SHOULD BE SELF-SUPPORTING.

Local authorities are vitally important in tourism developments, including those affecting the environment. After all, they are the locals who know the vagaries of their immediate environment and how it is changing with time and under tourism pressure. All local authorities in Western Australia have been contacted to seek their views on a number of issues. Most of those who have responded already have expressed interest in the Draft environmental guidelines, and this will be valuable for both tourism and the environment itself. The brochures produced under Guideline 32 should be available locally in each case from such local authorities and form part of their libraries.

6. LEGISLATIVE PROCEDURES/REQUIREMENTS

There are numerous Acts that relate to environmental protection in Western Australia. These range through local government (Council) by-laws to State Planning Commission zone plans and Health Department specifications. In all, more than 50 Acts of Parliament are involved in environmental regulatory powers. However, when one talks of "environmental plans" or overall environmental approvals, the reference is to powers vested in the Environmental Protection Authority (EPA) by the Environmental Protection Act (1986).

6.1. THE ENVIRONMENTAL PROTECTION AUTHORITY

The essence of the Environmental Protection Act (1986) is that the EPA is the final and umbrella environmental regulatory agency. It is important to note that the EPA can delegate appropriate powers to another person or agency. In theory, if a developer has completely satisfied the EPA (or the EPA has imposed conditions on a development) then his project can go forward, at least as far as environmental constraints are concerned. In theory, there should be no further or unexpected environmental conditions, although there is power under the Act to take account of new circumstances or otherwise change previously-agreed conditions (section 46).

6.2. EPA PROCEDURES.

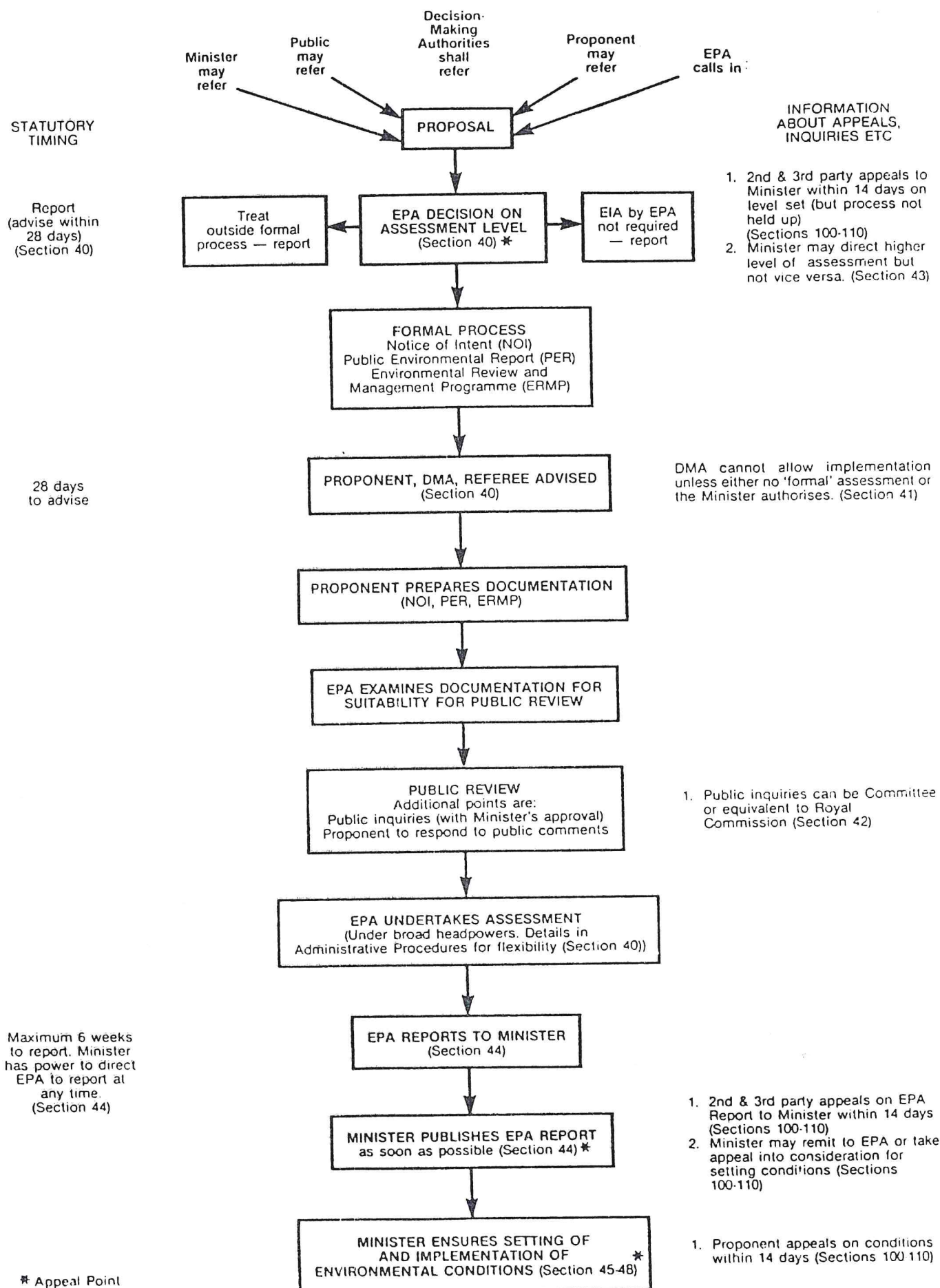
Under Part IV of the Environmental Protection Act (1986), the EPA has a variety of procedures for dealing with proposals referred to it. Such a proposal might be for a tourism development.

The sequence of referrals, decisions, possible appeals and the like is detailed in Figure 1 and is explained in more detail in the EPA Publication "A Guide to the Environmental Protection Act 1986 (EPA, 20th February, 1987).

In brief, there are various levels of possible assessment by the EPA. These may range from delegating the issue to another person or agency, and, of particular relevance here, the EPA may decide that an issue is purely a planning matter, not an environmental one. It may then completely abstain from involvement and rely on the State Planning Commission for total management by a Government agency.

Figure 1

The Environmental Assessment (EIA) Process
(Under the Environmental Protection Act, 1986)



It is still sometimes not clear, particularly in coastal areas, as to what processes will follow in every case (see Section 7 for a case study). The Act was proclaimed only in February, 1987, and there are as yet no formal written administrative procedures, because necessarily more examples of its application are being acquired.

Referring to Figure 1, if a project proposal is presented to it - and it can be formally referred as a specific proposal only once (section 38.5) - then the EPA has a variety of choices, depending, inter alia, on the expected impact on the environment or the level of public concern.

The EPA could carry out no assessment, and essentially bow out of the process to leave the project be handled by other arms of State or local Government.

Or it could carry out an internal assessment for low-key matters, or ones where precedents exist, or it can be handled in other ways. The time involved for such deliberations would usually be short, and flexible, with details negotiated in a one-on-one basis.

However, if the EPA does get formally involved because it considers that a proposal, if implemented, could have a significant effect on the environment, then it can do so at various levels, presently three in number. In order of complexity or detail, and generally also in corresponding order of increasing time and documentation requirements, the three present stages are :

- * a Notice of Intent (NOI)
- * a Public Environmental Report (PER)
- * an Environmental Review and Management Program (ERMP)

It should be recalled also that, under some circumstances, a public inquiry may be set up.

There are also administrative procedures for appeal by various parties at various stages (for details see Figure 1, the Environmental Protection Act, 1986 and the handbook "A Guide to the Environmental Protection Act 1986", EPA, 20 February, 1987.)

Added to the time for deliberations between the proponent (often the developer) and the EPA, and time for preparation of necessary documents, there is a (somewhat flexible) time generally allowed for public comment. This may be of order 6-8 weeks for a PER, or some 10-12 weeks for an ERMP, although clearly these need to be somewhat flexible to meet the complexity of an issue.

There are presently no formalised administrative procedures for the documentation etc under the Act, but the above "Guide" gives useful preliminary information, which can be augmented by direct contact with an officer of the Evaluation Division of the EPA.

In practice, the term "environment" in the 1986 Act is nearly all-embracing, including as it may social non-quantitative issues such as "aesthetic, cultural, economic and social surroundings to the extent that those surroundings directly affect or are affected by (man's) physical or biological surroundings" (Subsection 3(2) of the EP Act 1986).

As a consequence, and without being in any sense critical of the Act, it would be foolish to ignore the real-world fact that there can be, in portions of the community for example, non-professional bias or opinions that can be intrinsically anti-development under any circumstances, and that can then use the EP Act to argue against developments in general. We mention elsewhere how some sections of some local communities may be against any tourism development in their vicinity at all.

The EPA is in fact not the final arbiter - it is the State Government that is. At least one developer was unaware of his rights to appeal to the Minister about an EPA judgement (see Fig.1.)

So a developer should keep not only the environmental bureaucracy informed - he should also brief the appropriate Minister after his concept is reasonably well developed.

6.3. LOCAL AND REGIONAL ROLES

A developer should also keep the local authority (Council) informed. Often, indeed, local knowledge and expertise may greatly improve the fine-tuning of details of his plans - local, year-round knowledge can be vitally important for tourism developments, and to factors such as the prospect of year-round demand versus only peak usage, with resultant implications on the return from a resort.

However, it would not be practicable to set out here "guidelines" that indicate, for all development proposals, the exact sequence of keeping all administrative sectors informed. It would be foolish to ignore the facts that, on some occasions, premature discussion of a proposed development at its earliest stages may lead to local opposition, and to an early polarisation of views for and against a proposal.

Once such a polarisation is in place, often fuelled by various news stories, then it is generally extraordinarily difficult to assuage.

We suggest, in an attempt to resolve such real and common problems, that we can provide, as a general thesis:

GUIDELINE 33:

DEVELOPERS SHOULD TAKE ACCOUNT OF, AND TRY TO UNDERSTAND SUFFICIENTLY LOCAL ATTITUDES AND FEELINGS. THEY SHOULD TAKE SUCH ACTIONS AS NECESSARY, SUCH AS BRIEFINGS, MEETINGS, DISPLAYS, COMPARABLE EXAMPLES, SO AS TO AVOID AN ARROGANT POSITION OF POLARISATION, WHERE IT IS THE DEVELOPER AND HIS LOCAL SUPPORTERS VERSUS AN ELEMENT OF THE LOCAL COMMUNITY.

It might not be thought that such a Guideline rightfully belongs in a set of "environmental" guidelines, but in fact the most common objections to a development will be based, at least on the surface, on environmental issues, bearing in mind the wide scope of the term "environment".

Tourism developments pose a particular challenge to a local community. It has been stated many times, but for completeness it has to be repeated here.

A tourism development will seek to exploit a natural commodity, a special portion of the environment, that the "locals" have enjoyed previously with little outside perturbation. So there may be an understandable but "dog in the manger" resentment by portions of a local community, against the intrusion of outsiders and the way a tourism development may possibly cause changes in the environment. The problems of more fishermen elbowing for space on limited rock-fishing sites is one example, or jostling for space at small stores another, or even finding parking spaces in a normally quiet area.

Or a problem might be if the developer wants to develop a non-urban site, whereas the local council might want to use his headworks (water and electricity) to augment their financially-constrained urban services, and may want the development nearer to a townsite.

These are all just segments of a problem that a developer must resolve early in his plans. He must be clear, in his own mind, as to just what his project will be bringing to the community environment, if he is to become basically a commercial "user" of that environment that preceded him.

It will not be enough, though it is certainly relevant if calculations are done fairly and accurately, to talk in terms of increased local employment opportunities. It is, unfortunately, a fact of modern life that many of the more remote attractive areas have an excess of unemployed, who rejoice in their unemployment and are subsidised by society to do so. They also have spare time to be vocal and active against modification of their lotus land. We, frankly, do not feel that it is appropriate to put forward here useful guidelines to handle that problem, which is basically a morality and social issue.

Environmentally, perhaps, the developer can harness such dedicated hedonism by using knowledgeable, often professional, locals in learning and documenting more about the local environment. They are likely to know the truly magic local spots. Whether they want them widely known and used may be another matter, one that has to be resolved on local and personality details, as a "Site Specific" problem.

Obviously, in Western Australia with its vast distances and thinly-spread services, a developer has to respect not only local but also regional feelings and needs. Here, concentrating on environmental aspects under our Brief, we do not attempt to explore this fully.

Nor do we seek to contrast the development of iron-ore towns of the sixties by companies that were going to a site to exploit or use its mineral resources and needed new local workforces to do so, with the tourism developments of the eighties which seek to attract transients to a local site. The responsibilities and "user pays" situations as well as market forces are very different.

GUIDELINE 34:

IT IS ESSENTIAL TO STRESS THE NEED TO VIEW LARGER DEVELOPMENTS IN A REGIONAL SENSE, AND FOR DEVELOPERS TO TAKE ACCOUNT, IN WESTERN AUSTRALIA, OF THE WELL-DEVELOPED STRUCTURE OF REGIONAL ADMINISTRATORS OPERATING WITHIN THE DEPARTMENT OF REGIONAL DEVELOPMENT AND THE NORTHWEST. EACH HAS GENERAL KNOWLEDGE OF PERSONALITIES, NEEDS AND RESOURCES OF THE PARTICULAR REGION. EACH, WITHIN REASON, CAN PROVIDE VENUES AND LOGISTICS SUPPORT FOR MEETINGS AND COMMUNICATIONS IN REGIONAL AREAS.

In the Albany area and the Bunbury area there are two authorities, the Great Southern Development Authority and the SouthWest Development Authority, that have additional legislative coordinating "teeth". There is a further one planned.

The Tourism Commission itself has regional managers who may prove useful local coordinators and facilitators.

6.4 OTHER "ENVIRONMENTAL" AGENCIES.

As mentioned, there are numerous agencies other than the EPA involved in environmental requirements and decisions.

Among these, for the tourism developer, the Western Australia Water Authority must loom large, as potentially a supplier of essential services. However, under its legislation and left free to itself, the Water Authority can basically negotiate with the developer on commercial terms, while giving due regard to its regional and other responsibilities and capabilities.

There are more specialised and localised agencies such as the Waterways Commission. Here, policies are reasonably well advanced and articulated (eg see section 3.6). In particular the groups are small and one can carry out discussions simply at high levels, bearing in mind our dictum that "in bureaucracies there are plenty of people to say no, but very few who can say yes." This does not apply quite so strongly to such small groups.

The major problems that currently bewilder many developers in Western Australia about environmental and planning matters - whose boundaries are often blurred - are the respective roles and powers of the EPA, CALM and the State Planning Commission.

The EPA had its new Act, a complex change from the 1971/80 Act, proclaimed in February, 1987. It has yet to present Administrative Procedures for its complex array of assessment procedures. However, it has supplied Figure 1 and its booklet interpreting the Act, and these are very valuable.

CALM was formed in 1984 through an amalgamation of the former large Forests Department, the National Parks Authority and some other fragments of wildlife-related Government groups. It is understood that some significant legislative amendments may be put forward in the 1988 Autumn session of Parliament.

The State Planning Commission was formed in 1984, mainly by blending former metropolitan and country agencies and the Town Planning Board. Very comprehensive changes to its legislation have been proposed ("Draft Western Australian Planning Act 1987", State Planning Commission, May, 1987), and are being vigorously debated and revised with a view possibly to new legislation in the 1988 Autumn session of State Parliament.

In addition, the State Government decided as a matter of policy in 1986 to remove the immensely complex coastal areas from the environmental responsibility of the EPA and place them under SPC controls.

We make this summary without criticism, but merely to indicate the complexity and newness of most environmental administrative matters in Western Australia.

We would have liked to be able, in this document, to present a simple chart of procedure - a Flow Chart - whereby a potential tourism developer could thread his way through a sequence or even a "one-stop-shop" of approvals. We find that we cannot do so.

So, instead, in preceding portions of the text, particularly section 3 where different categories of environments were treated, we have included recommended first points of contact within Government for would-be tourism developers. There is as yet no "one stop shop" within Government for all environmental concerns over a proposed development.

We considered alternatives, such as the appointment of a "minder" for a project, as a single person, sufficiently senior to enlist senior-level coordination and cooperation in various instrumentalities, so as to keep a project fluid and reduce holding costs and delays. We still find that, although this should be unnecessary, it may still be the most fruitful procedure for a developer to follow. The concept was favoured by developers interviewed, but by few local authorities, who understandably desired no "extra bureaucratic interference".

Such a "minder" might be drawn from the Tourism Commission or from a relevant State agency. Indeed, the State Planning Commission has appointed a Development Officer who might fit the need. Alternatively, where funding is involved, the WADC may contribute a liaison officer, or finally he could be a professional senior consultant.

It is clear that environmental problems of tourism developments loom large in seeking Government approvals. But in our review, it is not at all clear that the environmental problems are as severe as the administrative treatment of them might imply.

Most tourism developers are already well aware of our Guideline 3, the "don't foul your own nest" guideline, and that serves as a powerful incentive to self-imposed responsible environmental planning.

Many of the complexities appear to arise from varied inter-agency uncertainties and even power struggles, submerged as they may be. When our dictum about bureaucracies is added, time delays and indecisions are exacerbated.

One issue that therefore arises from these deliberations, and it is straying far from the Terms of Reference, is to draw attention to the Queensland legislation "Integrated Resort Development Act, No 23 of 1987".

We are presently not knowledgeable of the success of this recent legislation, nor how a comparable Act would operate with the WA agencies that are quite different from Queensland agencies. Nor are we convinced a priori that more legislation is needed for tourism in the light of the recent and pending changes in the EPA, SPC and CALM Acts.

But it seems worth some deliberation, if one wants the tourism industry in Western Australia to emerge quickly from what presently is perceived by developers as something of a morass.

6.5. CURRENT PROMISING INITIATIVES.

Having been somewhat critical of this "morass", which is how many developers who were interviewed perceived the recent situation, it should now be stressed that there are a number of current or pending Government actions, chiefly at Departmental levels, which are aimed at solving such problems for developers. Although often on a case-by-case basis - rather than on the Integrated Resort Development legislative approach of Queensland - these must go a long way towards relieving past frustrations and delays.

While not all these are within the terms of reference of this project, several are listed briefly to indicate some general moves towards encouraging the orderly development of tourism in Western Australia, which we believe can in turn be of benefit to improved environmental care and management, as well as the economy.

Such moves - not in order of priority - include:

- . Selected financial advances for headworks costs (Tourism)
- . Policies for tourism developments on pastoral leases
- . Appointment of responsible expediting officer in DOLA
- . Appointment of development officer in SPC
- . Development of regional strategies by the SPC
- . Production of Environmental Guidance for Land Use and Development in Southwestern Australia by the EPA
- . Production of Country Coastal Development guidelines by the SPC
- . Recreation on Reservoirs and Catchments (Water Resources Council)
- . Wetlands guidelines for protection and management (EPA)
- . Strategies for conservation and recreation on CALM lands
- . Various waterways policies and plans (Waterways Commission)

Many of these documents are voluminous, and there was no practical hope of condensing them into this single report.

Instead, we have tried to distill what we consider are essential philosophies and some particularly important practical issues of environmental guidelines for tourism developments. Interestingly enough, but as expected, many of the reports are so specialised or single-minded that our broader philosophies and Guidelines of section 2 are rarely if ever articulated, but in taking a system overview they are actually underpinning some of the reports.

Further references are given in the selected Bibliography.

7. DEVELOPMENT METHODOLOGIES

7.1. BREADTH OF THE CONCEPT OF "ENVIRONMENT"

Although this document is entitled "Draft Environmental Guidelines", in fact it was recognised before work began that a great deal of attention would have to be given to the methodology of developments vis a vis Government procedures and approvals. In 1988, there are many agencies concerned with what is broadly termed "the environment".

The term "environment" is defined in the Environmental Protection Act (1986) as follows:

S.3(1)

"environment", subject to subsection (2), means living things, their physical, biological and social surroundings, and interactions between all of these (emphasis ours)

and S.3(2)

For the purposes of the definition of "environment" in subsection (1), the social surroundings of man are his aesthetic, cultural, economic and social surroundings to the extent that those surroundings directly affect or are affected by his physical or biological surroundings.

Consequently, although strictly speaking it is only the EPA that is ultimately responsible for environmental management in Western Australia (albeit delegating its responsibility on occasions to others) - see Section 6 herein - in practice the very breadth of the notion involves other agencies.

Perhaps more pertinent, the work of many other agencies, eg Water Authority, State Planning Commission, Dept of Land Administration, etc involve the EPA, and their otherwise normal commercial activities may require EPA approval because of the environmental consequences or implications.

So one of the problems we faced at the outset was trying to determine, for developers, a business-like sequence of

"Who does What to Whom, When and How?"

After this study, we can only conclude with the answer

"It varies, and it's changing."

Some details were given previously. We now take a case study.

7.2. DENHAM, A CASE STUDY

We took up as a model issue or possible "prototype" for the sequence of interactions for a possible tourism development a 6-hectare area of land near the beach at Denham in Shark Bay, and explored what happened to a tourism application, in order to pursue a particular case.

Early in 1986, a developer approached the Department of Land Administration (DOLA) with a tourism development concept for a segment of attractive, near beach, land in the Denham townsite. The local authority had been approached and was conceptually in favour.

DOLA referred the concept plan to relevant authorities, such as the State Energy Commission, the State Planning Commission, the Department of Agriculture, the Water Authority, the Department of Conservation and Environment, Conservation and Land Management, the local authority, etc seeking comments.

On the basis of such comments, DOLA design personnel refined the concept plan, eg to take into account adequate continued public access to the beach, and some planning practicalities. It should be stressed that this refined design was at Government expense, as were site visits.

The refined design was then sent for renewed Government review, and by this stage some more refined costings could be made, including a Valuer General estimate of the worth of the land.

By mid-1987 it was agreed that the land could be released on a 21-year lease, with freehold to be granted after approved development by stages.

Applications were subsequently advertised for the purchase of this Denham Lot 296 for "Holiday Accommodation", and that invitation was still extant at the time of Cyclone Herbie in mid-May, 1988. The advertisement called for such things as a detailed environmental management plan acceptable to the Shire and the EPA, and set various financial constraints. It also called for a reasonable level of development to proceed within two years, otherwise the land may be forfeited.

In other words, the public and environmental welfare were being protected, but the machinery necessarily took time to complete to the advertisement stage, and some economic changes in potential developers took place in the interim.

Administrative steps have now been taken to overcome what are traditionally called "bureaucratic delays", i.e. in movement of files and papers. However, it is not planned to bypass the various safeguards that applied in the Denham case.

So, a potential developer who sees tourism potential in a block of Crown land would go through the same processes, but there might be quicker final advertisement than in the Denham case.

Now, of course, since the devastation wrought by Cyclone Herbie on Denham, it would seem apt for the State and Shire to review the entire township arrangement to direct it towards being the prime, well-planned tourist resort that it could be. The town grew up in a somewhat ad-hoc manner, necessarily with time as a mixed fishing and resort town. It must continue to serve that mix.

However, if substantial millions of dollars are to be spent to relieve the human misery and financial costs incurred by the residents as a result of Herbie, it may well be opportune to add appropriate sums to rethink and redo some of the major planning.

Obviously in this brief summary we have omitted various private commercial negotiations and discussions as not being in the public domain.

7.3 CARRYING CAPACITY AND NODAL DEVELOPMENTS

It is common sense to recognise that any segment of land has a limited "carrying capacity" in the sense that, if this figure is exceeded for more than a reasonable proportion of time, the land may suffer environmental damage that may be irreparable or at least take a long time to recover.

Pastoralists and graziers are very familiar with the concept of carrying capacity in terms of overstocking their land.

With tourism much the same principles must apply. In sensitive beach and sand dune areas, it is already easily seen at hundreds or perhaps thousands of locations along the Western Australian coast where human or vehicular tracking has destroyed vegetation leaving a fragile, often mobile track through the sand to a popular swimming, surfing or fishing location.

GUIDELINE 35:

A TOURISM DEVELOPMENT SHOULD NOT ATTEMPT TO CATER FOR MORE TOURISTS THAN THE IMMEDIATE ENVIRONMENT CAN 'CARRY'.

Naturally, just as with pastoral areas, one can afford occasional overstocking (say at peak holiday periods), provided that the environment has a chance to recover afterwards.

The tourism developer can increase the carrying capacity of his immediate environment, in many cases, by sensible and sensitive planning. Putting in limited but well-planned access points to a beach is a simple illustration. Planning of types of transport is another.

So the sensible move, by a tourism developer, is to direct his attention very early to an environmental management plan. Even if this is done at first only in a preliminary way, i.e. without excessive attention to catalogues of flora and fauna, this early study should highlight for him, and for the designing architect, the areas of high environmental sensitivity, versus those where he can concentrate certain tourist attractions and activities.

GUIDELINE 36:

EARLY IN THE PLANNING OF A TOURISM DEVELOPMENT, AN ELEMENTARY ENVIRONMENTAL MANAGEMENT PLAN SHOULD BE DEVELOPED. WITHOUT EXCESSIVE ATTENTION TO CATALOGUES OF FLORA AND FAUNA, THIS PLAN SHOULD BE FOR THE PRINCIPAL PURPOSE OF IDENTIFYING LOCAL AREAS OF HIGH ENVIRONMENTAL SENSITIVITY (TO BE AVOIDED WHERE POSSIBLE) AND LOW ENVIRONMENTAL SENSITIVITY WHERE THE ARCHITECT CAN DIRECT MORE INTENSE DEVELOPMENT.

A simple example would be a survey, for a coastal development, of susceptible sand dune areas, and areas exposed to wind blow, etc.

We note, as an incidental comment, that some authorities who call for environmental management plans more or less as a routine ritual, may sometimes forget that they should have a specific purpose, such as that stated here, and not be serve merely as a source of material for the edification of archivists.

Associated with this concept of carrying capacity is the related notion of "nodal development". By this is meant that development (whether it be tourism, roads, townsites, caravan parks, or the like) should be separated by portions of undisturbed environment.

The alternative, of continuous strip development, running, for example, more or less ribbon-like in a continuous thread along the coast, is regarded as unsatisfactory for both practical and environmental reasons.

From a practical viewpoint, it is much more efficient and economic to provide service facilities, water, kiosks, toilets, power, life-saving, road access, parking lots, to nodes than it is to ribbon development. To use a nuclear analogy, there is a critical mass of people needed before such services become viable.

GUIDELINE 37:

TOURISM DEVELOPMENTS ALONG THE COAST SHOULD BE PLANNED TO CONFORM WITH NODAL PATTERNS, BOTH OF DEVELOPMENT AND OF ACCESS.

The environmental argument for nodal development can be two-edged. The argument in favour is that it can leave much of the environment, viz between nodes, in a "natural" state, and thus, by implication, enjoyable and renewable and cheap to maintain.

The environmental argument against nodal development is, of course, a consequence of our earlier discussion about carrying capacity. With nodal development, there is a hazard of possibly exceeding the local carrying capacity while leaving much of the remainder in its natural form. The analogy would be that of a farmer who overgrazed one paddock while the next paddock had rich grasslands.

On balance, in Western Australia even in the metropolitan area, the nodal approach to development must be favoured. Natural and undisturbed areas must be left in perpetuity. The resultant increased "people pressure" on individual nodes should not be beyond the wit of man to manage, even if the immediate costs are higher. The long term cost of untrammelled ribbon-like development all along the metropolitan coast would be immeasurably higher, albeit impossible to measure in dollars.

And in the real world of the rest of the State, the same arguments will prevail, principally that of ensuring viability of service costs.

The problems for both tourism developer and the environmental regulatory agencies are to balance out future growth of a resort so that the local carrying capacity of the environment is not exceeded, and Guideline 3 destroyed irrevocably.

If the Guidelines in this and previous sections are followed, such a self-destruct situation will not arise.

With the increasing practical guidance and assistance to tourism developers, eg by the headworks repayment scheme and by the nomination of areas of prime tourism potential, with the increasingly detailed plans by several agencies, and hopefully with the Guidelines of this study, one can look forward to a situation where a flourishing tourism industry is a real participant in sensible environmental management.

8. CONCLUDING COMMENTS

In these Draft Guidelines we have sought to emphasise the ways that tourism and the environment can work together. We have gone further, and stated that tourism, in many cases, needs to develop sound environmental practices or it will damage the very attractiveness of the environment that brought its customers in the first place.

Conversely, environmental management can be enhanced, both financially and logistically, by the creation of responsible tourism developments.

We have therefore sought to develop an environmental ethic for tourism developers, as well as try to dispel some of the apparently automatic antagonism that some environmentalists feel towards the concept of "tourism". If these efforts succeed, we can see both economic and environmental benefits for Western Australia.

We conclude with the following thought.

Increasingly, a significant part of a tourist attraction will be satisfying the thirst for knowledge of the intricacies and joys of the surrounding environment. If the tourism developer, in conjunction with experts, can satisfy that thirst knowledgeably, then he will enhance the attractiveness of his development.

Conversely, from the environmental point of view, the resultant increase in popular knowledge and enjoyment of the environment will increase the body of informed environmental knowledge, and will increase appreciation for the real-world environment.

We submit that it is from such increased public environmental knowledge and appreciation, rather than from punitive legislation, that the long-term advances in environmental management will come.

APPENDIX 1 TERMS OF REFERENCE

The broad definition of "Environment" as contained in the Environmental Protection Act (1986), shall be used for the purposes of this project.

The objective of this project is to prepare a set of Draft Environmental Guidelines for Tourism Developments in Western Australia ("the Guidelines") that:

- can be used by developers;
- are acceptable to statutory authorities;
- will be favourably accepted by the public; and
- will attract tourists and developers alike.

The Guidelines are to take into account, and be developed in liaison with, relevant statutory and advisory bodies of State Government .

The Guidelines must incorporate an outline of the methodology and timetable by which the required statutory approvals of environmental issues could be targeted by developers. The development of the methodology should involve discussions with both individual, and representatives of, tourism developers as appropriate.

The Guidelines need to be acceptable, useful and as specific as possible.

APPENDIX 2

ACKNOWLEDGEMENTS AND PERSONS CONSULTED

The author accepts full responsibility for all of this text and draft guidelines. However, preparation of this report would not have been possible without a great deal of support from many people, which, without exception, has been given freely and willingly.

This project was carried out with the assistance of a working group led by Terry McVeigh (Tourism Commission), with the other two members being Eugene Stankevicius (Tourism Commission) and Ian Briggs (EPA). Their helpful comments and suggestions are acknowledged with thanks.

Over 50 individuals were consulted, ranging from senior Government officers to tourism developers. Several conservation groups were also consulted, and all local authorities throughout the State consulted by mail, of whom some 20% responded.

In several critical areas, comments were sought on early drafts, without prejudice to comment on the later complete document.

Our thanks are due to all these people, who unanimously endorsed both the need for and the notion of the study. I look forward to their appraisal of these Draft Guidelines in due course.

APPENDIX 3 SELECTED BIBLIOGRAPHY

NOTE: Numerous references were given in the text where they were specifically relevant to the topic being discussed. The following references relate to reports with broader application.

1. "A Guide to the Environmental Protection Act 1986", Environmental Protection Authority, 20th February, 1987.
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