



Freycinet National Park

Wineglass Bay Second Lookout and
Track Work Project

RAA3456

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Department of Primary Industries, Parks, Water and Environment

Environmental Assessment Report

Proponent	PWS Operations Branch Northern Region
Proposal	Wineglass Bay Second Lookout and Track Work Project
Location	Freycinet National Park
RAA No.	3456
Document ID.	Environmental Assessment Report – Wineglass Bay Second Lookout and Track Work – May 2020
Assessment type	Class 3 PWS Landscapes Division
Related initiatives	Freycinet National Park Management Plan 2004 (Altering the Freycinet National Park, Wye River State Reserve Management Plan 2000) Freycinet Peninsula Master Plan 2019
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Acronyms

AHT	Aboriginal Heritage Tasmania
CEMP	Construction Environmental Management Plan
DPIPWE	Department of Primary Industries, Parks, Water and Environment
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EAR	Environmental Assessment Report (this report)
EOI	Expressions of Interest
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
FRP	Fibreglass Reinforced Plastic
FNPMP (2000)	<i>Freycinet National Park/Wye River State Reserve Management Plan 2000</i>
FNPMP (2004)	<i>Freycinet National Park Management Plan 2004 (Altering the Freycinet National Park, Wye River State Reserve Management Plan 2000)</i>
FPMP	<i>Freycinet Peninsula Master Plan 2019</i>
GSBC	Glamorgan Spring Bay Council
JRA	Job Risk Analysis
MP	Management Plan
NC Act	<i>Nature Conservation Act 2002</i>
NCH	Natural and Cultural Heritage Division, DPIPWE
NP	National Park
NPRM Act	<i>National Parks and Reserves Management Act 2002</i>
PCAB	Policy and Conservation Advice Branch, NCH Division, DPIPWE
PWS	Tasmania Parks and Wildlife Service
RAA	Reserve Activity Assessment
TNVC	Threatened Native Vegetation Communities
TSP Act	<i>Threatened Species Protection Act 1995</i>
UDP	Unanticipated Discovery Plan

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Report Summary

This report completes the environmental assessment of the Wineglass Bay Second Lookout and Track Work Project proposed by the Tasmania Parks and Wildlife Service (PWS).

The PWS is proposing to construct a second viewing platform to overlook Wineglass Bay. This 'Lookout and Track' project is one of a number of key initiatives identified in the *Freycinet Peninsula Master Plan 2019*, and has been identified as a key component to achieve the vision of the master plan, addressing particularly "the need to reduce crowding and provide a more tranquil experience".

This proposal will also implement recommendations of the *Freycinet National Park Management Plan 2004* (Altering the Freycinet National Park, Wye River State Reserve Management Plan 2000) (FNPMP 2004) regarding the second lookout and track work. Funding is available through the Tourism Infrastructure Improvement Program and other sources, with planning taking place this financial year, and construction over this and the 2020-21 financial year.

This report has been prepared based on the draft environmental impact assessment (EIA) (Reserve Activity Assessment [RAA] #3456), which includes agency advice, and public submissions. The recommendations from this report were incorporated into the final EIA (RAA #3456).

This report provides an evaluation of the EIA process for the proposal in accordance with PWS policy. The PWS, as the administering authority of the *National Parks and Reserves Management Act 2002* (NPRM Act), developed the proposal and coordinated the assessment process.

The assessment process is presented in section 1 of this report; section 2 describes the statutory requirements and principles underpinning the assessment; the proposal is described in section 3; section 4 reviews the need for the proposal and the design alternatives; section 5 summarises the public and agency consultation process, and the issues raised in that process; section 6 provides an evaluation of the issues; and section 7 the report conclusions.

Appendix 1 lists the commitments outlined in the final EIA; Appendix 2 lists the submitters and provides a copy of all public submissions received; and Appendix 3 is an analysis of issues raised in the submissions.

This completed Environmental Assessment Report (EAR) finalises the EIA process.

1. Assessment Process

A draft EIA (RAA 3456) was released for public exhibition for a 28-day period from 27 March 2020. Assessment process milestones are summarised in Table 1.

Table 1: Milestones

Assessment Process Milestones	
2004	<i>Freycinet National Park Management Plan 2004 (Altering the Freycinet National Park, Wye River State Reserve Management Plan 2000)</i>
2019	Freycinet Peninsula Master Plan
2019	Proposal developed and funded
2019-20	Proposal design, including specialist reports
2020	PWS EIA
27 March 2020	Public consultation period commenced
27 April 2020	Public consultation period ended
June 2020	PWS environmental assessment completed

An application for a discretionary planning permit under the *Land Use Planning and Approvals Act 1993* (LUPAA) in relation to the proposal will be submitted to the Glamorgan Spring Bay Council (GSBC) once this report has been finalised. A building permit will also be required for the elevated viewing platforms.

No other local council permits are required to implement the proposal.

2. Statutory assessment and policy requirements

The *Nature Conservation Act 2002* (NC Act) is the regulatory mechanism in Tasmania through which land is proclaimed as a reserve. Schedule 1 of that Act sets out the purposes of reservation for the various classes of reserved land. For a national park, the purposes are the protection and maintenance of the natural and cultural values of the area, while providing for ecologically sustainable recreation consistent with conserving those values. The key statutory framework for achieving that aim is the NPRM Act.

Section 30 of the NPRM Act requires that the managing authority (Director of National Parks and Wildlife [NPW]) ensures development and use within a reserve area is in accordance with the FNPMP (2004). The EIA documentation (in this case RAA 3456) is an assessment of the proposal and the degree to which it is in accordance with the requirements of the management plan and policies. The EIA includes consideration of Australian and State Government legislative requirements.

As the proposal is within the Freycinet National Park (FNP), and the activity does not involve a lease or licence, the Director NPW, or their delegate, must make the decision as to whether or not the proposal is approved.

The FNPMP (2004) was prepared in accordance with the requirements of Part 3 of the NPRM Act. The EIA includes consideration of Australian and other Tasmanian Government legislative requirements.

3. The proposal

Proponent

The proponent is the Northern Region, Operations Branch of the PWS, a division of DPIPW.

Objective of the proposal

The EIA documents stated that the principle objective of the proposal is to improve the visitor experience and management of park visitors in the FNP, while protecting the natural and cultural values of the NP.

Proposal summary

The proposal is wholly within the FNP. It is proposed to construct a new elevated viewing platform and a one-way elevated walkway below and adjoining the site of the existing Wineglass Bay Lookout. This project will involve the construction of an additional lookout platform and a loop track adjacent to the existing lookout platform overlooking Wineglass Bay (see Figure 1 following).

The walkway will connect with the existing two-way path, descending below the existing lookout toward a new viewing platform. From the new viewing platform, the walkway will curve back up the hill to connect via a set of stairs with the existing lookout. The proposed design takes advantage of the line of exposed granite bedrock and boulders at the site, with the new walkway designed to follow the rock-face and thereby minimise vegetation loss. A small platform, with timber bench seats, will also be constructed between the existing two-way path and the new second lookout platform

Through both the construction period and operation of the new infrastructure, visitors will be informed using interpretation signage, education materials, and compliance provisions. A detailed description of the proposal is provided in Section 1 of the EIA document.

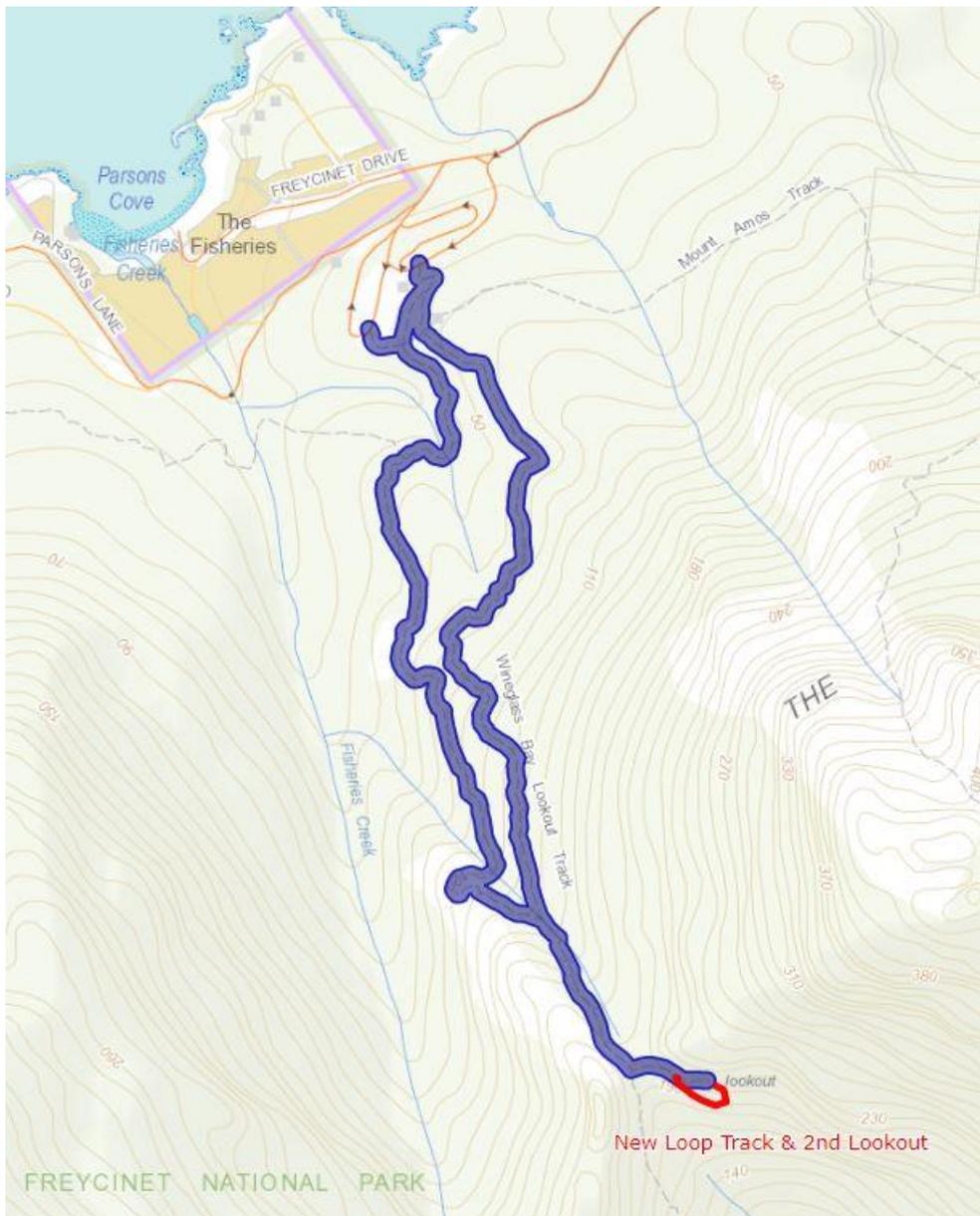


Figure 1. Freycinet National Park – Second Lookout and track work location

4. Need for the proposal and alternatives

The proposal is a \$700,000 investment to implement the recommendations of the FPMP.

The proposal features a new one-way loop track, elevated walkways with viewing platforms, seating areas, and a new elevated second lookout connecting to the existing lookout and track via a new rock path and steps. Appropriate signage alerting visitors to the 'one-way' configuration of the new track will also be included.

Alternative sites and design were considered, including (refer Table 2.1 EIA):

- Do nothing – existing facilities provide insufficient capacity compromising visitor experience.
- Restriction of visitor numbers – addressed in FPMP. Compliance difficult, and concerns that visitors would be displaced to other sites.
- Track – alternatives considered including two-way traffic on existing track, and alternative route for track. Primary motivators for current choice avoiding and ameliorating impacts on threatened flora and visitor safety.
- 2nd Lookout – alternatives considered via specialist study. Chosen location based on minimising impact on natural and cultural values; minimising visual impacts; and providing visitors with alternative scenic aspect.
- Infrastructure design and materials – various alternative materials and designs considered. Primary motivators for current choice - avoiding and ameliorating impacts on threatened flora; visual amenity; and ongoing maintenance implications.

The proposal, as described in EIA section 1, is considered the most suitable design for the best visitor experience while minimising impact on the natural and cultural values of the national park.

5. Public and Agency consultation

A summary of public comments is in Appendix 3 of this report. Table 2 summarises the submission types.

Table 2: Summary of submissions by type

Type of submission	Number
Private individuals	3
TOTAL	3

Three public submissions were received by the advertised date - see Appendix 2 for copies. The issues identified included:

- No development option – given reduction in tourism due to COVID-19, the project should not proceed;
- Cap visitor numbers – visitors to FNP should be restricted;
- Introduction of higher park entry fees for visitors who only access the Lookout;
- Increased bushfire risk to infrastructure;
- Public submission period should remain open until end of COVID-19 park closures; and
- Lack of cumulative impact assessment with reference to EOI proposals.

The draft EIA was referred to a number of government agencies/bodies with a possible interest in the proposal.

The following branches within DPIPW provided submissions:

- Aboriginal Heritage Tasmania (AHT)
- PCAB, NCH Division
- Major Projects and Infrastructure (engineering advice)

The National Parks and Wildlife Advisory Council also provided advice.

Liaison with the GSBC has occurred throughout the design and assessment process. The proposed works are consistent with the current reserve management plan prepared under the NPRM Act, and are thus permitted in the Environmental Management Zone per Section 29.2 of the *Glamorgan Spring Bay Interim Planning Scheme 2015*. The proposed viewing platform and walkways are located within a Landslide Hazard Area (Medium). A planning permit is therefore required. A building permit will also be required for the elevated viewing platforms.

No other requirements for permits from the GSBC were identified.

Feedback from the above referral bodies has been incorporated into the discussion of environmental management issues in the next section, and in the final EIA.

6. Evaluation of environmental impacts

The environmental assessment issues raised in the submissions, and relevant to the proposal, have been evaluated. Details of this evaluation, including the commitments made by the PWS for implementing the proposal, are discussed, including:

1. Flora, fauna and threatened communities.
2. Visual impacts.

Issues that require additional explanatory material are addressed in the following section.

Issue 1: Flora, fauna and threatened communities

Description of potential impacts
<p><u>Flora</u></p> <p>Several populations of plant species listed under the TSP Act and the Australian Government EPBC Act occur within the vicinity of the proposal area.</p> <p>During construction there will be minimal impact on native vegetation, mostly involving branch and shrub removal for tracks, or excess shading of boardwalks and lookout platforms.</p> <p>The EIA field study identified two threatened flora species (under the TSP Act and the EPBC Act) within the proposal footprint. Several individuals of Bearded heath (<i>Epacris barbata</i>) [TSP Act Endangered, and EPBC Act Endangered] were recorded from within and adjacent to the anticipated construction footprint. The proposed infrastructure has been designed to avoid the identified individuals of <i>Epacris barbata</i>. Individual plants have been marked with blue tape and their co-ordinates recorded for inclusion in the Construction Environmental Management Plan.</p> <p>A small population of the superb Greenhood (<i>Pterostylis grandiflora</i>) [TSP Act Rare] was reported from the existing Wineglass Bay Lookout, located under the elevated walkway, 60 m west of the main lookout. This site was confirmed by the surveys conducted for the EIA (EIA Appendix C). This site will remain undisturbed by the proposed works. Additional preventative measures proposed by the consultant have been adopted by the PWS, including:</p> <ul style="list-style-type: none">• minimise access and impacts to the area downslope of the existing elevated walkway which supports individuals of <i>Pterostylis grandiflora</i>; and• infill the existing elevated walkway rails by extending the existing rail a few metres further back to block egress. <p>There is potential for both species to be impacted during the construction phase. The track and lookout will be carefully located to avoid these species.</p> <p>During the operational phase, potential impacts are minimal. Materials (such as FRP) and the final design have been chosen to minimise impact on threatened species.</p>

No weeds of significance, or priority weeds (as classified under the *Weed Management Act 1999*), were recorded within the study area. No non-native species were recorded in the activity area.

The proposal is located within a Phytophthora Management Zone, which raises the level of importance for controls to keep the zone *Phytophthora cinnamomi* (PC) free. No sign of PC or other disease was recorded during the field study in the activity area. Given the control measures to be implemented, the potential for the introduction of weed species or diseases during both the construction and operation phases of the project is minimal.

Fauna

The natural values assessment (EIA Appendix C) identified potential habitat for several State and Australian Government listed fauna species, but no known sites or specific habitat features requiring special management. It was concluded that it is unlikely any listed fauna species would be impacted by the development.

During the construction phase, the use of helicopters has the potential to impact on known Wedge-tailed eagle nests if conducted in the eagle-breeding season (July to January inclusive).

Threatened Native Vegetation Communities (TNVC)

The natural values assessment found no evidence of TNVC in the proposal area.

Management measures proposed

The final EIA commitments include those listed in Appendix 1 of this report and summarised following:

- Commitment 1** Prepare and implement a Construction Environmental Management Plan (CEMP) including weed management and hygiene plan; erosion and sediment control; fuel and dangerous substances management.
- Commitment 3** All threatened plants tagged and avoided during works and establishment of laydown areas; best practice PC measures implemented.
- Commitment 4** Obtain a permit under the TSP Act if required.
- Commitment 7** Vegetation clearance minimised, including avoiding mature trees.
- Commitment 8** Use a helicopter flight path avoiding known raptor sites.
- Commitment 9** Implement a Fire Action Plan to minimise fire risk.
- Commitment 12** Ensure imported rock material is weed/PC free.
- Commitment 13** Extend existing walkway rail to prevent visitors leaving walkway and impacting threatened plants.
- Commitment 14** Best practice hygiene measures to prevent disease spread.
- Commitment 15** Audit of contractor compliance with biosecurity controls during construction.
- Commitment 18** Indigenous planting used to screen new infrastructure.
- Commitment 20** Post-construction weed and rehabilitation monitoring.

Public and agency comment

No public comments were made on this issue.

<p>Agency advice included:</p> <ul style="list-style-type: none"> • the need for strict adherence to measures to avoid tagged individuals of <i>Epacris barbata</i>; • the need for a permit under the TSP Act to take or disturb these species if they cannot be avoided once the construction footprint is confirmed; and • support the extension of the existing walkway railing to protect <i>Pterostylis grandiflora</i> from current impacts (as recommended by consultant).
<p>Evaluation</p>
<p>With the implementation of Commitments outlined above, the residual risk to flora, fauna and TNVC is considered low.</p> <p>The PWS has committed to implementing a comprehensive CEMP and selected sites and building materials to minimise impact on flora.</p> <p>Contemporary building techniques and use of FRP decking should allow light penetration sufficient for the native vegetation to regenerate underneath decking.</p> <p>There is, nevertheless, potential for environmental harm to occur if the management measures are not applied, particularly to the two threatened flora species near the lookout. No work shall commence on the site until all threatened plant species are tagged. A permit under the TSP Act to take or disturb these species will be sought if individuals cannot be avoided once the extent of the construction site is established. Strict adherence to best practice PC hygiene measures by the contractors is crucial and will be audited by the PWS.</p> <p>The route was selected for the access track to minimise impact on threatened plant species.</p> <p>The potential for impact to threatened fauna species during construction or operation of the project is considered low.</p> <p>The project will have no impacts on threatened communities.</p> <p>The PWS has committed to appropriate siting of the walking track and a helicopter flight path that avoids all known eagle nests.</p>
<p>Conclusion</p>
<p>The PWS will undertake the proposal in accordance with the Commitments outlined above. As a result, the management of the proposal's likely impact on flora, fauna and threatened communities would be in accordance with the FNPMP (2004).</p>

Issue 2: Visual impacts

<p>Description of potential impacts</p>
<p>The draft EIA concluded that the new lookout and loop track structures will add to the current lookout impact by resulting in another 'layer' of people, but is likely to be perceived as a part of the existing lookout system. As seen from other viewpoints looking into the site, the nature of the impacts is assessed as being the same, but the magnitude will increase marginally.</p>

During the construction phase there will be temporary and minor visual impacts from the use of helicopters to lift equipment into the construction site.

Overall potential visual impact is low, and the magnitude of change is minor for the closer viewpoints, and low and negligible for viewpoints further away. Visitors will likely be accepting of this level of infrastructure at an iconic site such as this.

Most visitors pass through the lookout on their way to the beach, and see it as a part of the visitor experience. It is likely that this view would be seen within that context and be considered a part of the visitor experience rather than a separate visual intrusion in the landscape.

From the northern end of Wineglass Bay, beach users and walkers have a clear view of the lookout setting. People standing on the platform edge are likely to be discernible if they are wearing contrast colours, but not visually dominant. The deck structure will not be visible.

Under existing conditions, it is likely that most visitors on the beach are not aware of the infrastructure because it is largely lost within the complex shapes, colours and shadowing that is characteristic of the landscape in that location.

Management measures proposed

In addition to the design and siting proposals discussed above, the visual assessment management measures to be implemented by the PWS include those listed in Appendix 1 of this report, and summarised following:

Commitment 7 Vegetation clearance minimised, including avoiding mature trees.

Commitment 11 Use of materials, designs and paint colour codes that blend with the environment in all building works.

Commitment 18 Indigenous planting used to screen new infrastructure.

Public and agency comment

No public comments were made on this issue.

Agency advice was supportive of the use of non-reflective materials and post-construction screening using indigenous plantings.

Evaluation

The final EIA assesses the visual impact of the project by describing the existing situation, potential impact of the proposal, and mitigation of impacts. The EIA includes the Visual Impact Assessment (EIA Appendix A) and discussion of viewfields.

Amelioration of visual impacts is addressed throughout the design proposed.

Overall potential for visual impacts is low, given the facilities are consistent with an existing land use, and, despite the visual presence of the facilities, visitors will be expecting to see and use the proposed infrastructure.

Conclusion

The PWS will implement the proposal in accordance with the final design drawings and specifications, and Commitments outlined above. Potential for visual impact is considered acceptable. Topographical features and vegetation should ameliorate some visual impact, and the design, position, materials and colour should further minimise visual impacts.

Other issues

The following issues requiring additional explanatory material were identified during the agency and public submission process.

Issue 1. **Planning and construction during COVID-19**

Several submissions pointed to a perceived failure of the PWS to make adequate allowance for the impact of COVID-19 on future visitor numbers to FNP. The submissions contended that the proposal should not proceed given the temporarily reduced visitor numbers.

Management of visitor numbers and infrastructure requirements is a complex issue and is addressed by the PWS during the infrastructure and reserve area planning process. This proposal implements the relevant recommendations from several planning processes.

Engagement and consultation on this proposal has occurred since initial planning commenced during the 2004 amendment to the FNPMP (2000). The 2004 alteration to the original Management Plan provides for the construction of a one-way loop track to the Wineglass Bay Lookout (including a second lookout) to prevent the deterioration of natural values and provide improved quality of visitor experience by reducing crowding and safety hazards.

The FPMP is a strategic planning document to guide the future direction for managing the Peninsula. The FPMP is supported by detailed design processes for each of the key initiatives. This proposal is a priority initiative of the FPMP. The FPMP takes into consideration the needs of international, national and local visitors, and utilises usage data, visitor characteristics, and attitudes analysis for the planning recommendations, including potential visitor management tools (s3.5 Master Plan) and visitation limits.

The FPMP recognises that the Wineglass Bay Track, and in particular the lookout, will continue to be the pinnacle of a visitor journey into the Freycinet Peninsula.

Extensive public consultation was undertaken during the development of the FPMP and supporting documents. Major stakeholders, the general public and relevant agencies provided feedback influencing the desired outcomes for which this proposal is delivering.

The 'Do nothing' option was assessed (EIA s2.3), and it was concluded that existing facilities provide insufficient capacity for current visitor numbers. The existing facilities were considered inadequate for 2004 visitor numbers, and numbers have increased since then.

The outcomes targeted by the proposal remain relevant even if the scenario of reduced post COVID-19 visitors is applied, namely:

1. Sustainable management of visitor impacts in the FNP recreation zone.
2. Improved visitor experience, including a new viewing aspect of Wineglass Bay.

This proposal will provide improved infrastructure consistent with relevant track class prescriptions and current building standards.

7. Statement of reasons

This assessment has been based on the information provided in the EIA and incorporates specialist advice provided by DPIPWE scientific specialists and regulatory staff. This assessment has also addressed the issues raised in public submissions.

Statement of Reasons

The statement of reasons is a summary of assessment criteria relevant to the proposal and how the criteria were addressed.

Assessment criteria

Table 1.2 of EIA summarises relevant statutory and policy requirements. The proposal was designed and assessed under the following statutory and policy requirements:

Freycinet National Park / Wye River State Reserve Management Plan 2000 (and subsequent alterations) – the proposal is consistent with this plan, that also addresses the requirements of Schedules 1 and 2 of the NPRM Act.

NPRM Act managing authority functions and powers (s30) - Part 3 Management of reserved land – reserve area management plans.

Walking Track Management Strategy for TNPR 2011-2020 – section 2 of the EIA addresses this strategy and defines an appropriate track class. The Strategy and the EIA identifies the need for appropriate long-term management of the track and infrastructure from the car park to Wineglass Bay Lookout, and that upgraded infrastructure is a high priority.

Reserves Standards Framework 2014 – was applied to assist in matching visitor skills and abilities to the level of infrastructure required to address visitor risk within the FNP (section 3.1.5 of the EIA).

Freycinet Peninsula Master Plan 2019 – this proposal, along with other key initiatives identified in the FPMP, will provide a base for sustainable increased visitation and spend in the area.

Glamorgan Spring Bay Interim Planning Scheme 2013 - section 3.1.6 of the EIA addresses local GSBC advice on Environmental Management Zone code provisions. GSBC advice about the Landslip Overlay and Waterways Code is addressed in section 5 of this Report.

1. The proposal is acceptable because:
 - the EIA under the identified assessment criteria demonstrates that the proposal would not cause significant adverse impacts;
 - the proposal supports the reserve management requirements of the FNPMP (2004); and
 - the proposal assists in conserving the identified natural and cultural values of the FNP.
2. The proposal can be implemented in accordance with the Commitments stated in Appendix 1 of this report, and section 6 of the final EIA.

8. Decision

I am satisfied that:

1. The proposal is acceptable because:
 - the environmental impact assessment under the identified assessment criteria demonstrates that the proposal would not cause significant adverse impacts;
 - the proposal supports the reserve management requirements of the *Freycinet National Park MP 2004* (altering the Freycinet National Park/Wye River State Reserve Management Plan 2000); and
 - the proposal assists in conserving the identified natural and cultural values of the Freycinet National Park.
2. The proposal can be implemented in accordance with the Commitments stated in Appendix 1 of this report, and section 6 of the final Environmental Impact Assessment.



Jason Jacobi
General Manager
Parks and Wildlife Service

Date: 25 June 2020

[The EIA process is completed when this environmental assessment report is signed by the managing authority and provided to the PWS Regional Manager North]

9. Appendices

Appendix 1 – PWS Commitments

The proposal will be implemented as outlined in this environmental assessment report including the specific Commitments following.

No.	Commitment	Project Phase
Pre-Construction Commitments		
1	A CEMP in accordance with PWS guidelines will be prepared prior to works by the successful contractor, and submitted to the PWS for approval.	Pre-Construction
2	A Communications Plan, including visitor safety during construction, will be approved prior to commencement of works.	Planning and Pre-Construction
3	Contractors will be briefed about: <ul style="list-style-type: none"> - The location of threatened plants to be avoided during all works and use of laydown areas; - Management concerns with respect to PC (and weeds), including information on field symptoms and hygiene protocols; - content of Unanticipated Discovery Plan and their obligations under the <i>Aboriginal Heritage Act 1975</i>; and - awareness of all safety risks and actions required to reduce risk. 	Pre-Construction
4	A permit will be required under Section 51 of the Tasmanian <i>Threatened Species Protection Act 1995</i> to take individuals of <i>Epacris barbata</i> if, for any reason, the individuals cannot be avoided during construction.	Pre-Construction
5	An Emergency Response Plan will be developed, including: <ul style="list-style-type: none"> - Evacuation from a remote area in the event of injury, death or threatening circumstances. - Early warning systems for unstable weather, wildfires etc. - Emergency contact details. - Setup communication systems and process between remote parties and field centre. 	Pre-Construction and Construction
6	Job Risk Analysis (JRA) will be completed and signed by all project persons for compliance undertaking risk-based tasks.	Pre-Construction and Construction
Construction Commitments		
7	All vegetation clearance will be limited to the identified development footprint; construction equipment, laydown area and storage will be contained within the footprint.	Construction

8	<p>All heli-slinging operations will be carried out in accordance with the DPIPWE <i>Safe Working Procedure – External slinging of loads from Helicopters</i> PR-054 Policy.</p> <p>Pilots will be briefed regarding eagle nest locations and set flight paths will be selected to ensure adequate (minimum 1 km) exclusion areas around known nest sites will be maintained.</p> <p>Helicopter pilots will follow fly-neighbourly protocols.</p>	Pre-construction and Construction
9	<p>Contractors are to ensure operations are suspended immediately once the Forest Fire Danger Index is calculated as equal to or greater than HIGH 20, or the relative humidity is equal to or less than 30%. Contractors will not undertake hot works in reserves until the Forest Fire Danger Index has dropped below High 20, or the relative humidity risen above 30%. Hourly weather observations will be taken at the site of the works as directed by the supervisor.</p> <p>Adequate and operational firefighting equipment will be maintained onsite during construction.</p> <p>Schedule construction work during winter season to minimise potential for hot works issues.</p>	Construction
10	<p>Management of unanticipated discoveries of Aboriginal relics undertaken in accordance with the <i>Aboriginal Heritage Act 1975</i>, and the Unanticipated Discovery Plan as prescribed by AHT.</p>	Construction
11	<p>Steel surfaces, or balustrade fences, will be non-reflective and with matt finish, low colour contrast material. Platform and walking track made of charcoal grey FRP.</p>	Construction
12	<p>Local rock, plus gravel from recently certified PC/weed free quarries, will be utilised to construct new tracks.</p>	Construction
13	<p>Extend existing walkway rail to prevent visitors departing from walkway.</p>	Construction
14	<p>Application of strict machinery, helicopter, slinging gear, vehicle and personnel hygiene protocols for all construction and helipad activities, which includes spraying work boots with Phytoclean™ prior to leaving the walkers' car park.</p>	Construction
15	<p>PWS Audit for compliance with biosecurity controls during works will be carried out.</p>	Construction
16	<p>Visitor safety will be addressed around the construction sites across the reserve with advance warnings, signage, and closed off construction areas.</p>	Pre-Construction and Construction
Post Construction Commitments		
17	<p>Final site clean-up to the satisfaction of the PWS.</p>	Post-construction
18	<p>Indigenous native plants used for any screening required.</p>	Post-construction
19	<p>New interpretive signage will be placed at key locations to advise one-way walking direction and improve education around weed and disease hygiene when walking in remote areas.</p>	Operation

20	An annual post-construction weed and rehabilitation monitoring program will be implemented for a minimum of five years post-construction. At the completion of the five-year period, results will be reviewed and, if rehabilitation or weed control are not considered adequate, then the monitoring and control program will be extended.	Operation
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Appendix 2 – Public submissions

Copies of the three submissions received are attached. Names of private individuals have been redacted for privacy reasons, unless express permission for publication was obtained from the individual.

No.	Name	Individual submission or company name
1	S and P Franklin	Individual
2	Philip Stigant	Individual
3	Cathie Plowman	Individual

Submission 1: Private individual

In the current situation of tourism being halted and the deteriorating drying environment with increasing fire risk, this is not an appropriate time for the PWS to be considering a second lookout.

Already the area is overrun, and visitor experience is continually being degraded by overcrowding at every level; roads, carparks, walking tracks and facilities. With the halt in tourism, now is the time to reassess the impact on parks and change tack by capping visitor numbers. This should be on a two-tier basis, 1) fleeting mass tourism and (2) those seeking in depth experience. That is, the mass merely going to the lookouts before quickly leaving and those wishing to venture further afield.

There is no reason why these fleeting visitors should not be paying premium entry fees.

PWS must also face up to the fact that managing high visitor numbers is going to present huge challenges with the bushfire risks now advancing on the area. Park closures during summer are going to be an increasing fact as will evacuations. The more infrastructure you put in will be the more you loose and insurance will become impossible and losses born by PWS.

So, save money, cap numbers and make the experience for everyone better, by dropping this project.

S & P Franklin

Submission 2: Private individual

Sir/Madam,

I refer to your invitation to comment on the project to build a second lookout and associated structures at the saddle between Coles Bay and Wineglass Bay.

It seems that this project has ticked the boxes with respect to the minutia, but fails on a grand scale when viewed from the wider perspective of management philosophy.

The problem is the fundamental one of sheer numbers of people. We can go on building stuff “to enhance the visitors’ quality of experience” add infinitum and so long as we keep advertising and in other ways encouraging visitation, we will see ever more visitors which will degrade the experience further.

At some stage we will need to stop.

In retrospect it may have been better if we had not sealed the road to Coles Bay. I have fond memories of the more relaxed atmosphere at that time. The old lookout on the rock to the West of the track was a bit of a scramble, but well worth it. In those days there was not the mad scramble to monetise everything. We valued what we had and were proud to show it to visitors who valued it as we did. There was no need to make it big business.

I am hopeful that the current epidemic will cause a rethink of the whole concept of mass tourism and frequent travel to far-flung places. Perhaps we could use this pause to rethink our philosophy of how we manage Parks. We can return to managing Parks for the beauty and other qualities for which they were reserved in the first place. We do not need to hawk them off to the world.

So, my request is that this second lookout not be built (not for any lack in skill of the design team), but because it is on the wrong pathway. The way to reduce congestion is to stop advertising. We could even stop tourist companies from advertising. That way we will see fewer tourists and the ones who do come here are more likely to share our values of respect for our special places. Perhaps we could even stop maintaining the road.

Yours sincerely,

P Stigant

Submission 3: Private individual

I write to make the following comments:

1) The public comment period should not be closed while people cannot access the national park due to covid-19.

Currently national parks are closed to members of the community. The deadline for comments on this proposal should be extended to a date two weeks after any Tasmanian (regardless of which area of the state they live in) can visit the Freycinet National Park once it has re-opened as part of the pandemic 'lock-down'.

For the Parks and Wildlife Service to be making decisions about developments in national parks at a time when the public cannot access the area to make their own considerations of the project is a denial of proper community involvement, and unfair to the community.

2) The carrying capacity of the Freycinet National Park needs to be determined.

The proposal states that current visitation to Freycinet National Park is 300 000 per annum and predict ongoing growth of visitor numbers of 3.5 per cent each year. Each time I respond to any documents from the Parks and Wildlife Service re this national park, I raise the issue of carrying capacity, and this is never responded to or addressed. Likewise, this was an issue raised by several community members at a public workshop I attended conducted by PWS in Launceston several years ago.

The PWS assumes ongoing and unmitigated growth. The PWS needs to initiate a process to determine a sustainable carrying capacity of people to the national park. This process should include the quality and maintenance of visitor experience. I first visited the Freycinet National Park in 1982. In the year 2000 the national park was nothing like it was 18 years before. Now, 20 years later, there has been ongoing developments that make the national park a very different place to what it was in 2000. There has been significant clearing of vegetation for more and more carparks and constant re-working of the Freycinet lookout tracks and infrastructure to manage the congestion of people.

Meanwhile, many Tasmanians do not visit the national park in the summer months as they feel that it has become unpleasant, overcrowded and 'loved to death'.

Carrying capacity needs to be determined and a cap on visitation needs to be applied, as determined by the carrying capacity.

3) The project should be re-assessed in terms of covid-19.

While I realise that this proposal pre-dates the current pandemic, it needs to be reassessed in terms of covid-19. The budget of \$700 000 is significant and interstate and international tourism will be impacted on by covid-19 for many years to come, hence the forecast growth in national park visitation needs a reassessment.

Many tourism experts, including Tasmanian Rob Pennicott, have stated in recent weeks that tourism post the pandemic will be changed and that visitation will be reduced. Even Tasmanian visitors will have their spending and recreation behaviour altered as a result of job loss and reduced incomes. The financial reserves of retirees will be lowered.

Additionally, most visitors to the Freycinet National Park for some years to come will be Australian visitors and not international visitors. Are the experiences sought by Australian visitors the same as sought by overseas visitors? It cannot be assumed that they are, and one only needs to observe how different cultural groups behave in national parks to note that there are differences. There needs to be a re-assessment of this project by independent personnel.

It would also be improper to continue this process and to expend \$700 000 of community money on a project that assumes that 'things will be as they were before' once the pandemic has abated, especially when so many environmental works and facility upgrades are needed in many national parks and reserves across the state, including environmental works at Freycinet, where, for example and there are many others, the campsite at the southern end of Hazards Beach has been in need of some active rehabilitation and management for the past 20 years, but where vegetation trampling and campsite footprint continues unabated.

I know the position that government money is allocated to specific projects and needs to be expended in a time frame, but governments re-allocate expenditure all the time, and this project and the expense of community money should be re-considered at this pandemic time.

Thank you for consideration of these comments

C Plowman

Appendix 3 – Analysis of public submissions

Issue	EIA RAA section	Comments	PWS response	Sub No.
Public submission period should remain open until end of COVID-19 park closures	s1.4, s3.1	The PWS shouldn't be making decisions about developments in national parks at a time when public cannot access the parks. Denial of proper community involvement.	<p>Engagement and consultation on this project has occurred since the proposal was first planned in the 2004 amendment to the FNPMP (2000).</p> <p>The 2004 alteration to the original Management Plan provides for the construction of a one-way loop track to the Wineglass Bay Lookout (including a second lookout) to prevent the deterioration of natural values and provide improved quality of visitor experience by reducing crowding and safety hazards.</p> <p>Engagement and consultation was also carried out for the FPMP. The FPMP identifies the Wineglass Bay Lookout and Track as one of the key <i>'Experience Nodes'</i> on the peninsula.</p> <p>The EIA was on public exhibition for comment for a period of four weeks, and major stakeholders, community members and the general public were informed.</p>	3
Carrying capacity of the FNP, and cap visitor numbers	s1.3, s3.1	The PWS should determine carrying capacity of the NP, including consideration of quality of visitor experience.	<p>Outside the scope of the EIA.</p> <p>Management of visitor numbers is a complex issue and is best addressed during the planning process. This proposal implements the relevant</p>	1, 2, 3

Issue	EIA RAA section	Comments	PWS response	Sub No.
		Cap on visitor numbers needs to be applied once carrying capacity determined.	<p>recommendations from several planning processes.</p> <p>The FNPMP 2004 identified the need for the construction of a one-way loop track to the Wineglass Bay Lookout and made provision for a second lookout. At 2004 visitor numbers, these measures were considered necessary to prevent the deterioration of natural values and provide improved quality of visitor experience by reducing crowding and safety hazards. Visitor numbers were by 2019.</p> <p>In 2019, the FPMP took into consideration the needs of international, national and local visitors, and utilised analysis of usage data and visitor characteristics and attitudes analysis to inform the recommendations of the FPMP.</p> <p>Extensive public consultation was undertaken during the development of these plans. Major stakeholders, general public and relevant agencies provided feedback influencing the desired outcomes for which this proposal is delivering.</p>	
Introduction of higher park entry fees for “fleeting mass tourism”		Two-tier park entry fee proposed for “fleeting visitors” only accessing lookout versus those seeking “in depth” experience.	<p>Outside the scope of the EIA.</p> <p>This is a PWS management issue, outside the scope of this proposal to consider.</p>	1

Issue	EIA RAA section	Comments	PWS response	Sub No.
Increased bushfire risk to infrastructure	s3.2.7, s4.6.1, s4.7.1	Increased bushfire risk to infrastructure not adequately assessed in planning phase.	<p>The PWS has an obligation to actively, effectively and efficiently manage the risks associated with bushfire occurrence within the FNP. The primary aim of fire management for the FNP, and the Recreation Zone in particular, is to exclude fire due to potential impacts on both environmental values and visitor risk.</p> <p>Ignition precautions have been undertaken for this proposal to prevent ignition from the proposed works during high fire danger days, along with safe storage of fuels.</p>	1
Re-assess need for project in terms of COVID-19	s2.3, s3.1	Impacts on interstate and international tourism numbers should be taken into consideration. Forecast growth in visitor numbers will not be realised.	<p>Planning for this project commenced in 2004 with the alteration of the <i>Freycinet National Park, Wye River State Reserve Management Plan 2000</i>, and the recognition that the existing lookout and access track required upgrading. The FPMP reiterated the need for the proposed works. An extensive public consultation process was undertaken during the development of these plans.</p> <p>Planning for the proposal took into consideration the needs of international, national and local visitors over a nearly 20-year period.</p> <p>The 'Do nothing' option was assessed by the EIA (s2.3) and it was concluded that existing facilities provide insufficient capacity for current visitor numbers.</p>	1, 2, 3

Issue	EIA RAA section	Comments	PWS response	Sub No.
			<p>The 'Do-nothing' option would not meet the objectives of the proposal, namely, to implement the actions outlined within the FPMP.</p> <p>The outcomes targeted by the proposal remain relevant even if the scenario of reduced international visitors is applied, namely:</p> <ol style="list-style-type: none"> 1. Sustainable management of visitor impacts in the FNP recreation zone. 2. Improved visitor experience, including a new viewing aspect of Wineglass Bay. 3. Improved infrastructure consistent with relevant track class prescriptions and current building standards. 	

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