



# Discovery Holiday Parks Cradle Mountain Expansion



3832 Cradle Mountain Road  
(Titles CP 143789/2 and CP 143789/3)  
Vale of Belvoir Conservation Area

RAA 3578

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Department of Primary Industries, Parks, Water and Environment

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# Environmental Assessment Report

<b>Proponent</b>	Discovery Holiday Parks
<b>Proposal</b>	Cradle Mountain expansion
<b>Location</b>	Cradle Mountain Road (PID 2795978 and PID 2624319)
<b>Reserve</b>	Vale of Belvoir Conservation Area
<b>RAA No.</b>	3578
<b>Document ID</b>	Environmental Assessment Report – Discovery Holiday Parks Cradle Mountain expansion – May 2021
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<b>Contact</b>	Tasmania Parks and Wildlife Service GPO Box 1751 Hobart Tasmania 7001  1300 TASPARKS (1300 827 727) <a href="http://www.parks.tas.gov.au">www.parks.tas.gov.au</a>

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# Glossary and abbreviations

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AH Act	<i>Aboriginal Heritage Act 1975</i>
AHAR	Aboriginal Heritage Assessment Report
AHT	Aboriginal Heritage Tasmania
BHMP	Bushfire Hazard Management Plan
CA	Conservation Area
CEMP	Construction Environmental Management Plan
DHPCM	Discovery Holiday Parks Cradle Mountain
EAR	Environmental Assessment Report
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
LUPA Act	<i>Land Use Planning and Approvals Act 1993</i>
MNES	Matters of National Environmental Significance
Mtn	Mountain
NC Act	<i>Nature Conservation Act 2002</i>
NCC	National Construction Code
NCH	Natural and Cultural Heritage
NPRM Act	<i>National Parks and Reserves Management Act 2002</i>
NPW	National Parks and Wildlife
NPWAC	National Parks and Wildlife Advisory Council
NVS	Natural Values Survey
PWS	Tasmania Parks and Wildlife Service
RAA	Reserve Activity Assessment
RSF	Recreational Standards Framework
STP	Sewage Treatment Plant
TFS	Tasmania Fire Service
TNVC	Threatened Native Vegetation Communities
TSP Act	<i>Threatened Species Protection Act 1995</i>
TWWHA	Tasmanian Wilderness World Heritage Area
TWWHA MP	<i>Tasmanian Wilderness World Heritage Area Management Plan 2016</i>
UDP	Unanticipated Discovery Plan
VIA	Visual Impact Assessment
VoBCA	Vale of Belvoir Conservation Area

# Report Summary

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This Environmental Assessment Report (EAR) completes the assessment of the proposed expansion of the Discovery Holiday Parks Cradle Mountain (DHPCM) visitor accommodation facility within the Vale of Belvoir Conservation Area (VoBCA). The proposal's unique identifier is Reserve Activity Assessment (RAA) 3578.

Cradle Mountain is one of Tasmania's most popular tourism attractions. The DHPCM visitor accommodation is operated by Discovery Holiday Parks on behalf of the Tasmania Parks and Wildlife Service (PWS), under a lease arrangement. The DHPCM is in the VoBCA, close to the Cradle Mountain Visitor Centre, and is outside of the Tasmanian Wilderness World Heritage Area (TWWHA).

Discovery Holiday Parks (the proponent) proposes 120 new visitor accommodation sites to increase capacity to 230 sites. The 120 additional sites include 69 cabins (mixture of one and two bedrooms, all-abilities access) and 51 camping/caravan sites (11 unpowered, 40 powered). The proposal also includes upgrades to other onsite supporting facilities (kitchen areas, wastewater management), parking, and road upgrades at the site access point from Cradle Mountain Road.

This EAR completes the environmental assessment of the proposal. The EAR evaluates the proposal in accordance with the PWS Environmental Management Policy and the *National Parks and Reserves Management Act 2002* (NPRM Act). This EAR has been prepared based on the information contained in the final Environmental Impact Statement (EIS) submitted by the proponent on 12 March 2021.

The final EIS was completed by the proponent in response to PWS comments and the public's submissions on the draft EIS. The draft EIS was open for public comment via the PWS 'Have your say' webpage from 6 May 2020 to 3 June 2020. Nine submissions were received for the proposal. These submissions range in topics from the proposal's compatibility with the statutory management objectives, to environmental impact considerations. Submissions have been addressed by the proponent in the Submission Report (March 2021) and the relevant sections of the final EIS. This EAR evaluates the proponent's response to the submissions.

Section 1 of this EAR presents the steps in the Environmental Impact Assessment (EIA) process and the dates they were completed. Section 2 outlines the EIA statutory and PWS policy requirements. Section 3 is a description of the proposal. Section 4 summarises the public and agency consultation process. Section 5 evaluates the need for the proposal, and alternatives to the proposal. Section 6 is an evaluation of the proposal with the management objectives and policies. Section 7 provides an assessment of the impacts to values, evaluation of the proposed management actions, and a summary of how the submissions have been addressed in the final design and management actions.

Appendix 1 provides a list of recommended commitments.

This EAR finalises the EIA process.

# 1. Assessment Process

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The proposal was assessed as a Level 3 EIA due to the proposed introduction of new assets on reserved lands, potential impacts on natural and cultural values, and the likely community interest in the proposal.

The proponent's draft EIS was reviewed by PWS officers and specialists, and published for public consultation. The proponent prepared the final EIS in response to the submissions received.

The final EIS was delayed due to the proponent resolving issues with the Kentish Council regarding the planning permit under the *Land Use Planning and Approvals Act 1993* (LUPA Act).

The assessment process and milestones are summarised in Table 1.

**Table 1 Assessment Process milestones**

<b>Date</b>	<b>Milestone</b>
<b>3 February 2020</b>	Draft EIS submitted to the PWS by the proponent. Draft EIS referred to specialist staff within DPIPWE.
<b>26 February 2020</b>	List of suggested amendments provided to the proponent (no requests for additional information, surveys or reports were required).
<b>8 April 2020</b>	Amended draft EIS submitted to the PWS by the proponent.
<b>29 April 2020</b>	Draft EIS accepted by the PWS for public consultation.
<b>6 May 2020</b>	Commencement of public consultation.
<b>3 June 2020</b>	End of public consultation period.
<b>3 July 2020</b>	PWS request for a Submission Report and final EIS to be prepared by the proponent. All submissions received during public consultation provided to the proponent.
<b>12 March 2021</b>	Final EIS submitted to the PWS for assessment.
<b>April 2021</b>	PWS EAR completed, including Statement of Reasons, commitments, and decision.

## Planning Permit – Kentish Council

**22 July 2020** Crown consent issued for the proponent to lodge a planning permit application with the Kentish Council.

**3 November 2020** Planning Permit issued, however water supply issues were disputed. DA2020/57.

**2 February 2021** Amended Planning Permit issued, water supply issues resolved.

### 1.1 Other approvals

Table 2 outlines likely other approvals required which are assessed separate to the PWS EIA process.

**Table 2 Other approvals**

Approval or Permit	Agency or Authority	Documentation and process
<b>Bushfire Hazard Management Plan (BHMP)</b>	Tasmania Fire Service (TFS)	AS-3959 – Construction of buildings in bushfire prone areas.  An accredited bushfire hazard practitioner has prepared a BHMP. The TFS, as the permit authority under the <i>Building Act 2016</i> , is assessing the BHMP.  The approved BHMP will determine the final building design permitted.
<b>Certificate of Likely Compliance</b>	Building Surveyor	Building Surveyors are the delegates under the <i>Building Act 2016</i> for assessing building designs to ensure compliance with the National Construction Code (NCC), AS and the <i>Building Act 2016</i> . The Building Surveyor will assess the detailed building drawings and engineering designs to ensure compliance with the NCC, the Act and relevant AS before issuing the Certificate of Likely Compliance.
<b>Building Permit</b>	Kentish Council	The Kentish Council is the permit authority under the <i>Building Act 2016</i> and will consider a Building Permit on receipt of the Certificate of Likely Compliance from the Building Surveyor.
<b>Plumbing Permit</b>	Kentish Council	The Kentish Council is the permit authority under the <i>Building Act 2016</i> for issuing Special Plumbing permits.

## 2. Statutory assessment and policy requirements

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The PWS Environmental Management Policy provides for the EIA process to assist in determining authorities for proposals on reserved land. The PWS EIA process requires EIS documentation, public consultation, and Statement of Reasons for a decision. The EIS includes consideration of Commonwealth, State legislative and local council requirements.

### 2.1 Statutory 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 the NC Act sets out the purposes of reservation for the various classes of reserved land. For a conservation area (CA), the purpose of reservation is:

*The protection and maintenance of the natural and cultural values of the area of land and the sustainable use of the natural resources of that area of land including special species timber harvesting*

The key statutory framework for achieving the purpose of reservation is the NPRM Act. The NPRM Act states the management objectives for each class of reserved land if there is no applicable statutory Management Plan.

Section 30 of the NPRM Act requires that the managing authority (Director National Parks and Wildlife [NPW]) ensures development and use within a reserve area is in accordance with the objectives of the reserve if there is no applicable statutory Management Plan. There is no statutory Management Plan in effect for the VoBCA; therefore, the proposal is required to align with and address the management objectives for a CA.

The proposal's consistency with the management objectives and PWS policies are evaluated in section 6 of this EAR.

### 2.2 Lease and Licence

Under the NPRM Act, the Director NPW is delegated to determine if the proposal is acceptable and the current lease amended to include the proposed development.

### 2.3 Other approvals

Following Aboriginal heritage surveys, Aboriginal Heritage Tasmania (AHT) advised a permit under the *Aboriginal Heritage Act 1975* (AH Act) is not required and, instead, an Unanticipated Discovery Plan (UDP) should be in effect during works.

If threatened flora cannot be avoided as part of the final project layout, a permit to take under the *Threatened Species Protection Act 1995* (TSP Act) would be required.

Where the proposal impacts wildlife habitat, a permit to interfere with wildlife under the NC Act would be required.

To allow the improvements to Cradle Mountain Road, part of the Crown land (Title Ref 141718/2) to the east of Cradle Mountain Road is proposed to be set aside to allow a 750mm widening of Cradle Mountain Road to install a Basic Right Turn for vehicles travelling south on the road.

A Forest Practices Plan is not required as the proposal is part of works carried out under authorisation of a planning permit.

**Table 3: Approvals Summary**

<b>Legislation or requirement</b>	<b>Permit Required?</b>	<b>Details</b>
<i>Nature Conservation Act 2002</i>	Yes	A permit to interfere with wildlife may be required.
<i>National Parks and Reserves Management Act 2002</i>	Yes	An amended lease would be required.
<i>Crown Lands Act 1976</i>	Yes	The proposal requires the setting aside of a 750mm corridor of Crown land east of Cradle Mtn Road at the entry to the DHPCM.
<i>Aboriginal Heritage Act 1975</i>	No	An Aboriginal heritage survey was completed. AHT was satisfied the works could be conducted in accordance with a UDP.
<i>Threatened Species Protection Act 1995</i>	Yes	An authority to take threatened flora may be required for the proposal pending the findings of pre-clearance surveys.
<i>Land Use Planning and Approvals Act 1993</i>	Yes	A planning permit from the Kentish Council has been issued.
<i>Building Regulations 2016</i>	Yes	A Certificate of Compliance from a Building Surveyor is yet to be issued for the proposal. Once issued, a Building Permit and Plumbing Permit will be sought from the Kentish Council.
Tasmania Fire Service	Yes	An acceptable BHMP required.

#### **2.4 Land Use Planning and Approvals Act 1993**

On 22 July 2020, the PWS provided consent on behalf of the Crown to the lodgement of the development application under section 57 of the LUPA Act. The proposal was assessed against the *Kentish Interim Planning Scheme 2013*.

The Kentish Council approved the Planning Permit on 3 November 2020. Appeals by the proponent to that approval meant an amended Planning Permit was issued on 2 February 2021.

A site BHMP is yet to be endorsed by the TFS, which would enable approval of permits under the *Building Regulations 2016*.

#### **2.5 Environment Protection and Biodiversity Conservation Act 1999**

The proponent did not refer the proposal to the Australian Government for assessment under the EPBC Act. The proponent stated that the proposal did not have a significant impact on Matters of National Environmental Significance (MNES).

# 3. Proposal

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## 3.1 Proponent

The proponent is Discovery Holiday Parks. Discovery Holiday Parks has leased the accommodation services site at Cradle Mountain since 2011 from the PWS. Prior to 2003, the PWS operated the site.

## 3.2 Proposal's infrastructure

The proposal includes:

- Additional accommodation for up to 400 patrons:
  - 51 caravan/camping sites (40 powered, 11 unpowered); and
  - 69 cabins (mixture of one and two bedroom, and accessible).
- New Manager's residence and conversion of old residence to office, café and retail space.
- New amenities block and camp kitchen/barbeque area.
- Upgrades to infrastructure, water supply, wastewater and sewage.
- Upgrades to entry/exit configuration, including a new roundabout and lanes.
- Improvements to Cradle Mountain Road:
  - setting aside of 750mm corridor of Crown land on the eastern side of Cradle Mountain Road to allow installation of a *basic right turn* for vehicles travelling south.

## 3.3 Objective and outcomes

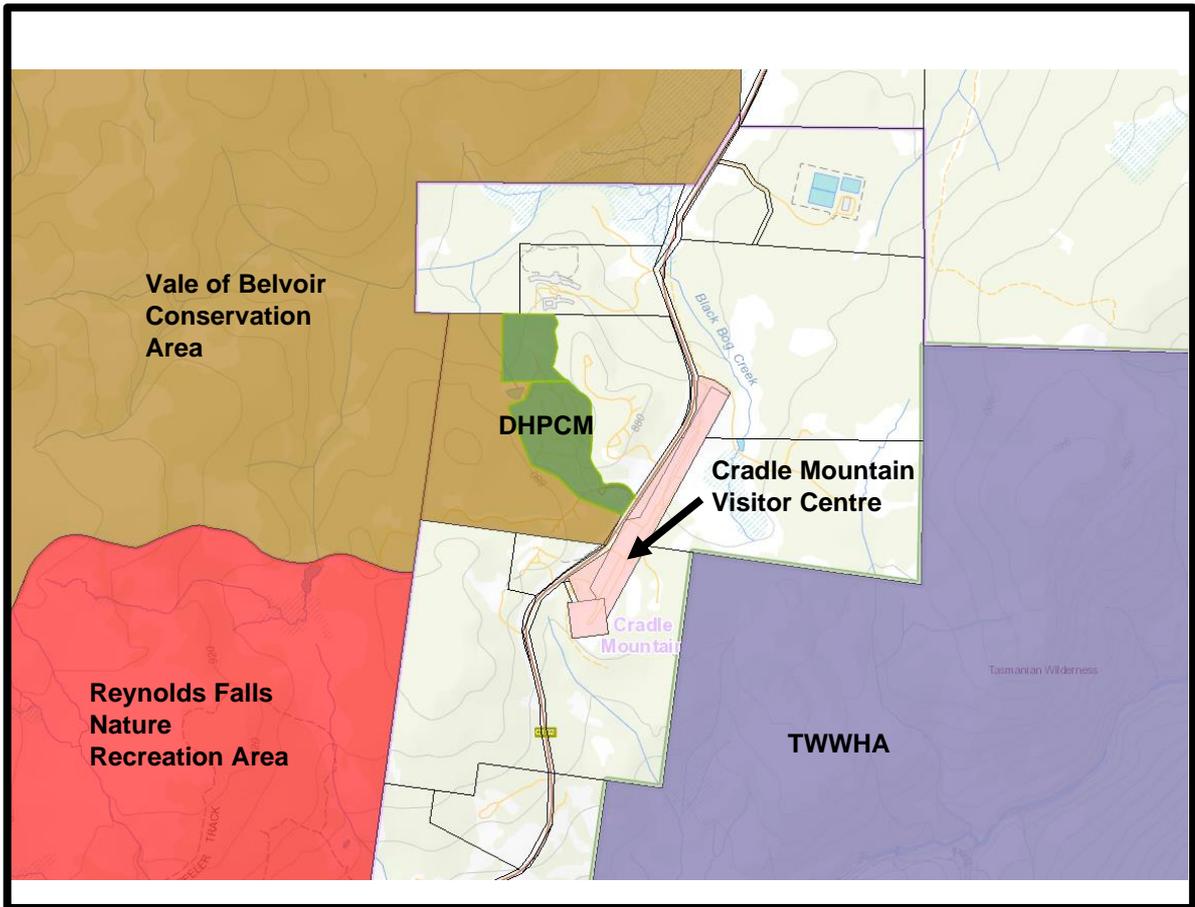
The proponent states (in the final EIS) the project's objectives and outcomes as:

*The objective of this Project is to expand the accommodation facilities available to visitors to the Cradle Mountain area, specifically the number of beds and facility standards available to visitors to Discovery Parks Cradle Mountain. The outcome of this upgrade will be higher diversity of low budget accommodation options available to visitors to the area, and an increase in profitability of the park.*

## 3.4 Location

The proposal is located within the VoBCA. The VoBCA is not part of the TWWHA, and is reserved land managed by the PWS on behalf of the Crown. The DHPCM is located 300m from the Cradle Mountain Visitor Centre and is adjacent to privately owned and operated accommodation services in the area, including Cradle Mountain Chateau, Cradle Mountain Wilderness Village, and Cradle Mountain Highlander Cottages.

The TWWHA is approximately 350m to the southeast at its closest point (the Cradle Mountain Visitor Centre is between the DHPCM and the TWWHA). The northern boundary of the Pencil Pine Visitor Services Zone, the primary tourism area of the TWWHA, is 1.8km south of the DHPCM.



**Figure 1 Location of the DHCM relative to the Cradle Mountain Visitor Centre on Crown land and surrounding reserved land. (Source ListMAP)**

The proposal adjoins the current DHCM accommodation area to the west and north. The new disturbance footprint would be up to 4.5ha of the 14.5ha area of the two lots. The disturbance footprint is the maximum that may be required to facilitate additional cleared areas around built structures for Bushfire Hazard Management.

Table 3 provides the details of the land part of the proposal.

**Table 3: Details of proposal land**

Lot and plan	Address	Land tenure type	Holder	Notes
CT 143789/2	3832 Cradle Mtn Road Cradle Mtn TAS 7306	Crown land	PWS	Existing site entry, facilities, cabins and caravan sites. New cabins and sites located on western and southern areas of tenure. Upgrades to site access.
CT 143789/3	3832 Cradle Mtn Road Cradle Mtn TAS 7306	Crown land	PWS	Existing infrastructure, former Sewage Treatment Plant (STP) site. New cabins to be developed in the area.
CT 143789/4	3832 Cradle Mtn Road Cradle Mtn TAS 7306	Crown land	PWS	Currently utilised for PWS staff accommodation. Some infrastructure works required.

<b>CT209951/1</b>	3718 Cradle Mtn Road Cradle Mtn TAS 7306	Private Freehold	Cradle Mtn Chateau	New emergency access/evacuation entry/exit.
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To the south of the VoBCA is the Reynolds Falls Nature Recreation Area.

Figures 1 and 2 show the proposal located in a pocket of the VoBCA and does not interrupt the corridor to the west which links the different areas of reserved land.

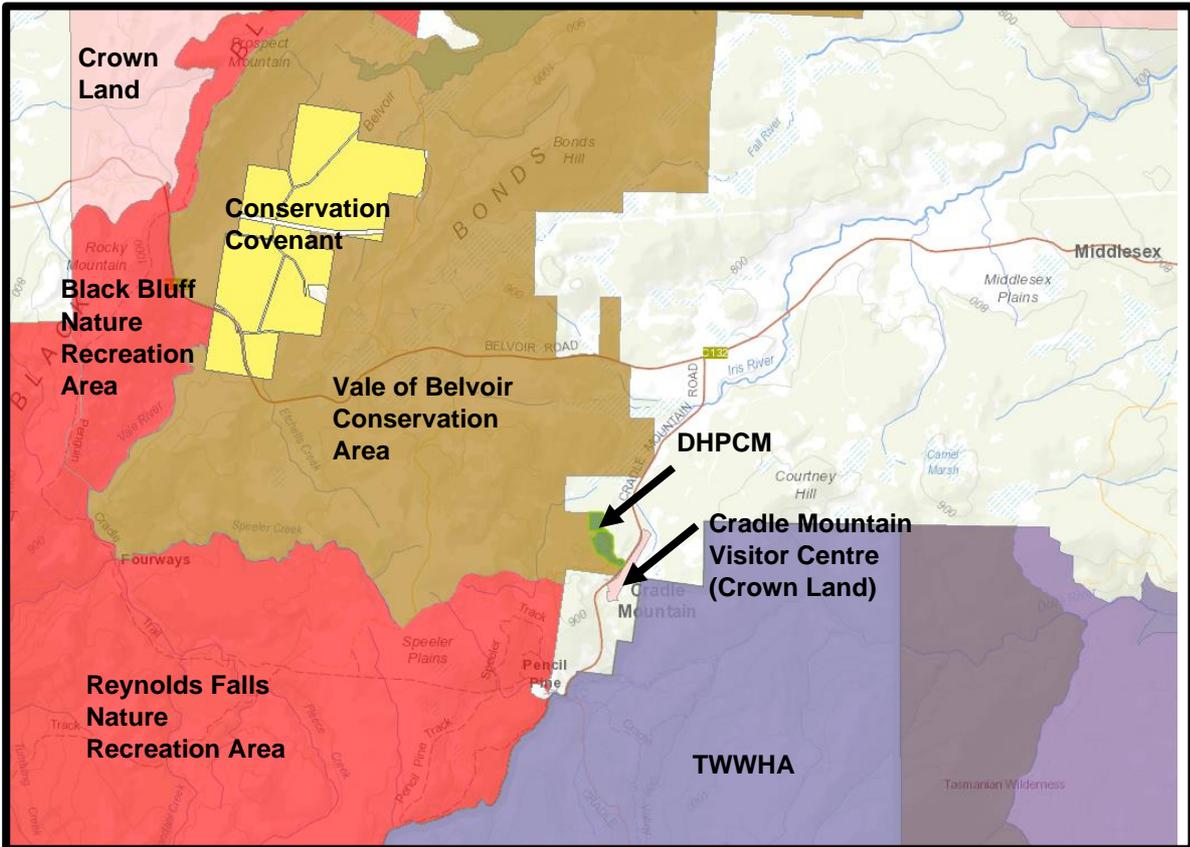


Figure 2 Reserved land and Conservation Covenant surrounding the DHCM.

### 3.5 Stages

The proponent has described undertaking the proposal in six stages. Stages are detailed in Table 4 below. This information is taken from *Table 2 Summary of project development components* in the final EIS. The associated areas can be seen in Appendix G - Site Plans, of the EIS.

**Table 4 DHPCM Proposed stages**

<b>Stage</b>	<b>Area</b>	<b>Area Description</b>	<b>Proposed Works</b>
<b>1</b>	B	Southern powered site area	Installation of 40 x powered sites and 11 x unpowered sites. New amenities block, camp kitchen. Installation of fire exit at rear of property.
<b>2</b>	C	Western cabin area	Infrastructure upgrades (power, water, sewer and gas), including services to area E and F. 3 x two bedroom cabins. 1 x accessible compliant cabin.
<b>3</b>	E	Central cabin area	Road works. 20 x standard two bedroom cabins. 2 x accessible compliant cabins.
<b>4</b>	A	Revised entry area	New Manager's residence.
<b>5</b>	A	Revised entry area	Conversion of existing Manager's residence to office/café and retail space. Installation of deck area. Install new car parking area. Install new parking lanes and roundabout.
	F	Northern cabin area	Installation of 33 new two bedroom cabins and two accessible compliant cabins.
<b>6</b>	D	Western boardwalk area	11 x new studio cabins and parking.

# 4. Public and Agency consultation

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## 4.1 DPIPWE and Authorities

The following branches within DPIPWE have been consulted and reviewed information relevant to their specialities during the assessment:

- Nature Conservation Branches of DPIPWE;
- AHT;
- PWS Assets and Engineering; and
- PWS Fire Operations.

The National Parks and Wildlife Advisory Council (NPWAC) also reviewed information and provided comment.

The current DPIPWE lease for the site would require updating to include the proposal's additional infrastructure.

The proponent will be responsible for acquiring all other approvals and permits prior to commencing works, and the decision to grant these will be with the relevant administering authorities. These are listed in section 1.6.4 and Table 1 of the EIS.

## 4.2 Public consultation of the Environmental Impact Statement

The draft EIS received nine submissions. Table 2 summarises the submission types.

**Table 2: Summary of submissions by type**

Type of Submission	Number
Private Individual	5
Community and Environmental Groups	3
Government Advisory Group (NPWAC)	1
<b>Total</b>	<b>9</b>

Submissions identified the following issues:

- use of public land for accommodation services;
- suitability of size and scale of proposal;
- type of accommodation provided;
- compatibility with management objectives of the NPRM Act;
- cumulative impacts;
- habitat and biodiversity loss, fragmentation (submission 5);
- visual impact (visibility from road);
- increase in traffic movements to the site, and potential fauna strikes;
- lighting;
- noise (submission 5);
- biosecurity (submission 5);

- viability of proposal in the context of COVID-19;
- water usage and reliability of supply;
- numbers of tourists in the TWWHA and mass-tourism; and
- affordability.

The issues raised by the submissions are addressed in the “Submission Report (March 2021)” and at the relevant parts of the EIS. Copies of the public submissions are available in the “Submission Report (March 2021)” on the proposal’s PWS EIA webpage <https://parks.tas.gov.au/about-us/managing-our-parks-and-reserves/environmental-impact-assessment>

Submissions raised concerns with the public consultation process, including the inability to access the proposal location during COVID-19. The restrictions in place during public consultation are acknowledged. It was considered that access to the location was not sufficient justification to delay, potentially indefinitely, the consultation period for the EIA process. PWS EIA policy is to make information available to the public.

### **Consultation by proponent**

The proponent consulted with the PWS, the Kentish Council, TasWater, the TFS and the Department of State Growth during the EIA process.

### **Satisfaction with proponent’s submission responses**

The proponent provided a satisfactory Submission Report. The Submission Report summarises submissions as themes and did not directly address some points in the submissions. Information addressing the specific points raised by submissions is present in the final EIS. Sections 5, 6 and 7 of this EAR discuss the points raised in the submissions, the proponent’s responses, and the PWS response.

# 5. Need for the proposal and alternatives

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Section 2 of the final EIS discusses the need for the proposal, and alternatives.

## 5.1 Demand

Tourism numbers for the TWWHA, particularly the Visitor Services Zone at Cradle Mountain, continue to increase and are projected to grow further in the years to come. However, as noted by some submissions, there are concerns about the potential for the COVID-19 outbreak to reduce visitor numbers to Cradle Mountain. Recently, the decrease in international and interstate visitors has been offset by more Tasmanians visiting parks and reserves, particularly during the low season.

The proponent has outlined development stages gradually increasing the pool of available accommodation in line with demand and not over-capitalising the site. This provides flexibility in responding to any potential lower demand whilst the COVID-19 outbreak continues to affect international travel and, occasionally, interstate travel.

It is considered that there is currently a demand for low-cost accommodation options near Cradle Mountain. Without the development, visitors who wish to camp or caravan, and are seeking a multi-day visit to the Cradle Visitor Centre and associated Visitor Services Zone, are required to drive 30km to find alternative accommodation.

Once international and interstate travel resumes unimpeded, it is anticipated that demand for accommodation, that suits a range of visitor types to Cradle Mountain, would be greater than the current supply of these options (such as affordable cabins).

The proposal location is in line with demands to not locate services within the TWWHA, and instead place development outside and on the edges, where it can facilitate multi-day visits which do not require persons to travel significant distances to access affordable accommodation.

It is accepted that there is sufficient demand for the proposal, and that would see an uptake of the low-cost accommodation for visitors to the tourism destination of the TWWHA, in particular the Cradle Mountain Visitor Services Zone.

The issue of increasing numbers of visitors to the TWWHA and how the impacts of this is managed is outside the scope of this EIA. This is managed through the *TWWHA Management Plan 2016* (TWWHA MP).

## 5.2 Alternatives of site location

The proponent has stated:

*The preferred option is to increase the cabin numbers and standard of accommodation. This option is considered an important requirement for ongoing growth of the Holiday Park and hence ongoing supply of a range of accommodation styles in the area designated as the Cradle Gateway 'Sustainable Tourism Precinct'. The final siting of cabins will be undertaken in response to environmental values identified at the site, hence minimising overall impact wherever possible.*

The proponent provided a minimal analysis of project options, and addressed only:

- Not building additional cabins and improve the standard of accommodation options. The demand for accommodation in the area will significantly exceed supply.
- Remove accommodation. Would result in significant loss in low-cost accommodation to the Cradle Mountain area, and is therefore not feasible.

In response to submissions that raised concerns with the proposed location on reserved land, and not private freehold, an alternative location of additional services away from the current site, on a freehold land site, was considered by PWS officers. This option would not be feasible as it would decentralise the accommodation and require an unnecessary duplication of services and facilities. This would result in higher accommodation costs and a strain on services in an isolated area. It would also result in disturbance in an area away from the current consolidated disturbance co-located within the Visitor Services Centre.

Furthermore, this would result in a loss of a service provided by the PWS. The DHPCM is operated by the proponent on behalf of the PWS under a lease arrangement and helps the PWS achieve its objective to provide low-cost accommodation close to the tourist destination of Cradle Mountain.

Historically, the land subject to the proposal was forestry land gazetted as a CA in 2000 as part of the *Tasmanian Regional Forest Agreement 1997*. In 2004, CT 143789 was subdivided into six lots. Lots 5 and 6 became part of the road reserve. Lot 1 was sold for the commercial development, Cradle Wilderness Village. Lot 4 contains PWS staff accommodation, sheds and water supply assets. Lot 3, subject to this proposal, is the former STP. Lot 2 contained the existing PWS campground, dormitory and amenities buildings for the public, managed by the PWS, but now managed by the proponent on behalf of the PWS.

### **5.3 Alternatives of mixture of accommodation**

Submissions raised concerns with the balance of accommodation provided in the proposal.

The TWWHA attracts all types of tourists and visitors. Visitors may be familiar with the wilderness, and embrace camping and more rugged accommodation options. Others visit to see and sample the wilderness, but may seek a quality of accommodation that is serviced and sheltered.

The proposal contains a mixture of cabins and camping/caravan sites which are powered and unpowered. Cabin style accommodation is likely an acceptable option. The size of the cabins has been minimised, is not considered luxurious (showers not spas), and contain basic facilities that allow persons to be self-sufficient during their stay. The variety of size of cabins is also suitable for the range of visitor groups, singles, couples or families, as well as all-abilities access.

The proponent has provided an appropriate balance of accommodation options in the proposal. Currently there are no other camping/caravan options available to visitors to the Visitor Services Hub at Cradle Mountain, other than those at the DHPCM.

### **5.4 Alternative use for site**

Submissions raised the issue of whether there was an alternative use for the site, such as walking track development.

A walking track in the location of the proposal is unsuitable due to the:

- existing availability of walking tracks in the nearby TWWHA;

- lack of significant features to generate appeal of a walking track;
- potential disruption to existing DHPCM operations for persons to access a new track; and
- perception of creating a new private walking track for persons visiting the DHPCM.

# 6. Evaluation of statutory requirements and policies

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## 6.1 Management Objectives

Section 3.2.4 of the EIS includes the proponent's assessment of the proposal and the degree to which it is in accordance with the requirements of the NPRM Act and policies. Several submissions raised concerns with the proposal's consistency with the management objectives for a CA stated in Schedule 1 of the NPRM Act.

Evaluation of the proposal against the management objectives is as follows.

### a) To conserve natural biological diversity

The proposal has been designed to minimise impacts to vegetation and habitat, specifically threatened flora and fauna features. The proposal may potentially clear up to 4.5ha of vegetation (potential maximum footprint of bushfire hazard management area) of the VoBCA's 4271ha. The five different vegetation communities within the proposal footprint are widespread throughout the surrounding reserved lands, including within the VoBCA. No Threatened Native Vegetation Communities (TNVC) are impacted by the proposal.

Surveys found one threatened plant specimen, and two potential habitat locations (burrows) for threatened wildlife, in the project area. The burrows were deemed to be likely occupied by a non-threatened species (Wombat). Intact and comprehensive communities of the threatened plant and habitat for threatened species are found in the surrounding reserved lands.

Hollow-bearing trees, though not protected, are found in the project footprint. Where possible, these trees will be preserved, though it is likely some would be removed as part of the proposal due to visitor safety requirements. These trees are currently near the existing camp and other visitor services in the area, and therefore offer a lower quality of habitat than hollows in other parts of the reserved land. The tree varieties in which hollows occur are common in the surrounding reserved land.

The proponent, by siting the development infrastructure, has sought to minimise the area required to be cleared, and endeavoured to retain vegetation. The proposal is adjacent to existing development.

The proposal is not inconsistent with the management objective to conserve biological diversity. The proposal would not significantly impact on the conservation of biological diversity of the reserved lands.

### b) To conserve geological diversity

The proposal does not directly impact on any listed geoconservation sites. The proposal is not inconsistent with the management objective to conserve geological diversity.

### c) To preserve the quality of water and protect catchments

The proposal is in the Black Bog Creek catchment that flows to the north, away from the TWWHA. A small un-named tributary connecting to Black Bog Creek, from the lake/wetland on the western side of the project site, is the nearest mapped watercourse.

The proposal remains to the eastern side of the tributary and does not propose direct interference with the watercourse (no watercourse crossings).

Parts of the site, susceptible to waterlogging, will have cabins raised on stumps, raised boardwalk connecting cabins, and vehicle parking located away from the cabins.

The proponent has recognised that the site has, historically, had occasional issues with scouring and erosion generating sediment-laden runoff. Parts of internal roads are proposed to be sealed and paved to reduce the susceptibility of material washing out and into drains. The site drainage network plan is designed to minimise the catchment of each drain and therefore reduce susceptibility of generating erosion and scouring.

Wastewater and sewage would continue to be directed to the TasWater facilities for treatment and management, and not released directly to receiving waters from the DHPCM.

To meet the increased water demand, and reduce demand for potable water, the proposal would harvest rainwater from rooves and connect to recycled water supplies from TasWater.

The proposal is not inconsistent with the management objective to preserve the quality of water and protect catchments.

**d) To conserve sites or areas of cultural significance**

An Aboriginal heritage survey was undertaken of the proposal area, including targeted investigation of two recorded Aboriginal heritage sites. The artefacts at the two sites could not be relocated. Surveys of the site did not locate other artefacts. A UDP will be in effect whilst works are carried out, and a 5m buffer implemented around the recorded sites. Whilst the site is close to a landscape feature of significance, the proposal will not directly impact on this feature.

The proposal is not inconsistent with the management objective to conserve sites or areas of cultural significance.

**e) To provide for the controlled use of natural resources including special species timber harvesting, and including as an adjunct to utilisation of marine resources**

The proposal does not include timber harvesting or using marine resources. The proposal location is adjacent to existing accommodation facilities, and within the local planning scheme's Cradle Gateway Specific Area Plan. The reserved land does not include marine areas. The proposal would not affect the use of other areas of the VoBCA for use in accordance with this objective. The proposal is not inconsistent with the management objective.

**f) To provide for exploration activities and utilisation of mineral resources**

The proposal does not relate to exploration for, or use of, mineral resources. The proposal location is adjacent to existing accommodation facilities, and within the local planning scheme's Cradle Gateway Specific Area Plan. The proposal would not affect the use of other areas of the VoBCA in accordance with this objective. The proposal is not inconsistent with the management objective.

**g) To provide for the taking, on an ecologically sustainable basis, of designated game species for commercial or private purposes, or both**

The proposal is not for the taking of game species. The proposal location is adjacent to existing accommodation facilities, and within the local planning scheme's Cradle Gateway Specific Area Plan. The proposal would not affect the use of other areas of the VoBCA in accordance with this objective. The proposal is not inconsistent with the management objective.

**h) To provide for other commercial or industrial uses of coastal areas**

The proposal is not located in a coastal area, nor does the reserved land feature coastal areas. The proposal is not inconsistent with the management objective.

**i) To encourage education based on the purposes of reservation and the natural or cultural values of the CA, or both**

The proposal is not directly related to providing education on the purposes of the reservation and natural or cultural values of the CA. The provision of affordable accommodation in the area may better facilitate the opportunity for educators and tour groups (school groups, research groups) to stay local to Cradle Mountain and the TWWHA and learn more about the natural and cultural values of Tasmania's reserved lands and World Heritage Areas.

The ability to stay close to nature also provides visitors with a heightened understanding of the value of respecting our natural areas and their biological and cultural values.

Visitors would be near educational information about Tasmania's reserved land at the Cradle Mountain Visitor Centre and Interpretation Centre at Pencil Pine.

The proposal would provide opportunities for education about reserved land, including the natural and cultural values. The proposal is not inconsistent with the management objective.

**j) To encourage research, particularly that which furthers the purposes of reservation**

The proposal does not directly relate to research. The proposal may assist with facilitating research on the reserve through the provision of low-cost affordable accommodation in proximity to the TWWHA, Cradle Mountain and other reserved land. This can support researchers to stay local for extended studies and investigations.

It is accepted that the proposal supports opportunities for research which furthers the purposes of reservation. The proposal is not inconsistent with the management objective.

**k) To protect the CA against, and rehabilitate the CA following, adverse impacts such as those of fire, introduced species, diseases and soil erosion on the CA's natural and cultural values and on assets within and adjacent to the CA**

The proposal would provide consolidated low-cost accommodation close to the tourist destination of the Cradle Mountain visitor zone. Other low-cost accommodation suitable for camping and caravans is not near the Cradle Mountain visitor zone. There is a small camping area at Lake Lea, with no facilities, while other formal camping and caravan options are 30-40km from Cradle Mountain.

Consolidated, formalised, supervised accommodation areas are preferred as it allows monitoring and management of impacts from campers and caravanners. Without suitable services close to a destination, there is a risk that campers and caravanners will find opportunistic locations to stop overnight, including within the VoBCA. This can lead to risks of fire, waste dumping, damage to soils and flora from vehicle movements and biosecurity issues, all which impact the health and quality of the CA. It can also put persons' personal safety in jeopardy, as park rangers are not available to advise when conditions are potentially dangerous.

By providing a formal low-cost accommodation area close to Cradle Mountain, it is likely visitors would use these facilities rather than other inappropriate locations. Unattended fires, biosecurity issues and waste can be better managed.

The ecological surveys undertaken did not find weed species in the project footprint. The surveyed area is the buffer to the existing accommodation facilities. This indicates that the site management assists in preventing potential biosecurity risks, such as weed spread, that can occur with campers and caravanners.

The proposal is not inconsistent with the management objective. The proposal addresses the protection of the CA and its values from adverse impacts such as fire, introduced species, diseases, and soil erosion.

**l) To encourage appropriate tourism, recreational use and enjoyment (including private uses) consistent with the conservation of the CA's natural and cultural values**

The proposal is to provide low-cost affordable accommodation, near the tourist destination of Cradle Mountain. The proposal would provide accommodation for up to an additional 400 patrons at the DHPCM. The accommodation options to be developed include 51 camping/caravan sites, and 69 cabins ranging from studio to two bedroom. Current dormitory/hostel style accommodation will continue. The DHPCM caters to a range of visitor budgets, including options not provided elsewhere in the vicinity of Cradle Mountain.

As discussed in the other management objectives, the proposal can be developed without causing loss of biological and geological diversity, deteriorating the quality of water in local waterways, and a loss of sites or areas of cultural significance.

It is accepted that the proposal encourages appropriate tourism, recreational use and enjoyment of the natural and cultural values of the VoBCA and other surrounding reserved lands, including Cradle Mountain and the TWWHA. Consequently, the proposal directly furthers this management objective.

**m) To encourage cooperative management programs with Aboriginal people in areas of significance to them in a manner consistent with the purposes of reservation and the other management objectives**

The proponent has consulted with AHT as part of the preparation of the proposal, and completed an Aboriginal Heritage Report for the proposal. The proposal is respectful of the Aboriginal heritage of the area, as the proposal avoids impacts to sites and landscape features of Aboriginal heritage. The proposal is not inconsistent with the management objective.

**Summary of objectives assessment**

It is accepted that the proposal directly encourages tourism (objective l) and is not inconsistent with the other management objectives for a CA as stated in Schedule 1 of the NPRM Act. The proposal also supports the protection of other reserved land in the area, including the TWWHA.

## **6.2 Other policies**

There is no statutory zoning in effect for the VoBCA. There are also no site specific non-statutory planning documents in effect for the VoBCA.

The proposal is located outside areas to which the TWWHA MP and the Pencil Pine Visitors Service Zone apply.

Whilst the proposal is located outside of the TWHHA, the DHPCM would primarily serve accommodation needs of visitors to the TWWHA.

The proposal is consistent with the *Tasmanian Reserve Management Code of Practice 2003* (Code of Practice), particularly policies on the provision of visitor services and infrastructure, and protection of reserves from impacts of human use.

Section 6.8 of the Code of Practice requires the location and infrastructure provided takes into account:

- conservation values;
- zoning decisions in management plans and local government planning schemes;
- existing infrastructure (including outside the reserve);

- establishment and maintenance costs; and
- recreational opportunities in keeping with the character of the reserve.

It is considered the proposal has appropriately considered each of the above. The proposal

- is sited to avoid key conservation values;
- is consistent with the NPRM Act management objectives and *Kentish Interim Planning Scheme 2013* and its *Specific Area Plan for the Cradle Gateway*;
- adjoins existing accommodation infrastructure and does not directly impact on the TWWHA;
- does not result in unreasonable costs for the PWS to establish, maintain or operate should the proponent be unable to continue; and
- contains a mixture of accommodation types which cater to the range of visitor types to the TWWHA and provides persons with local accommodation from which to explore the reserves in the area.

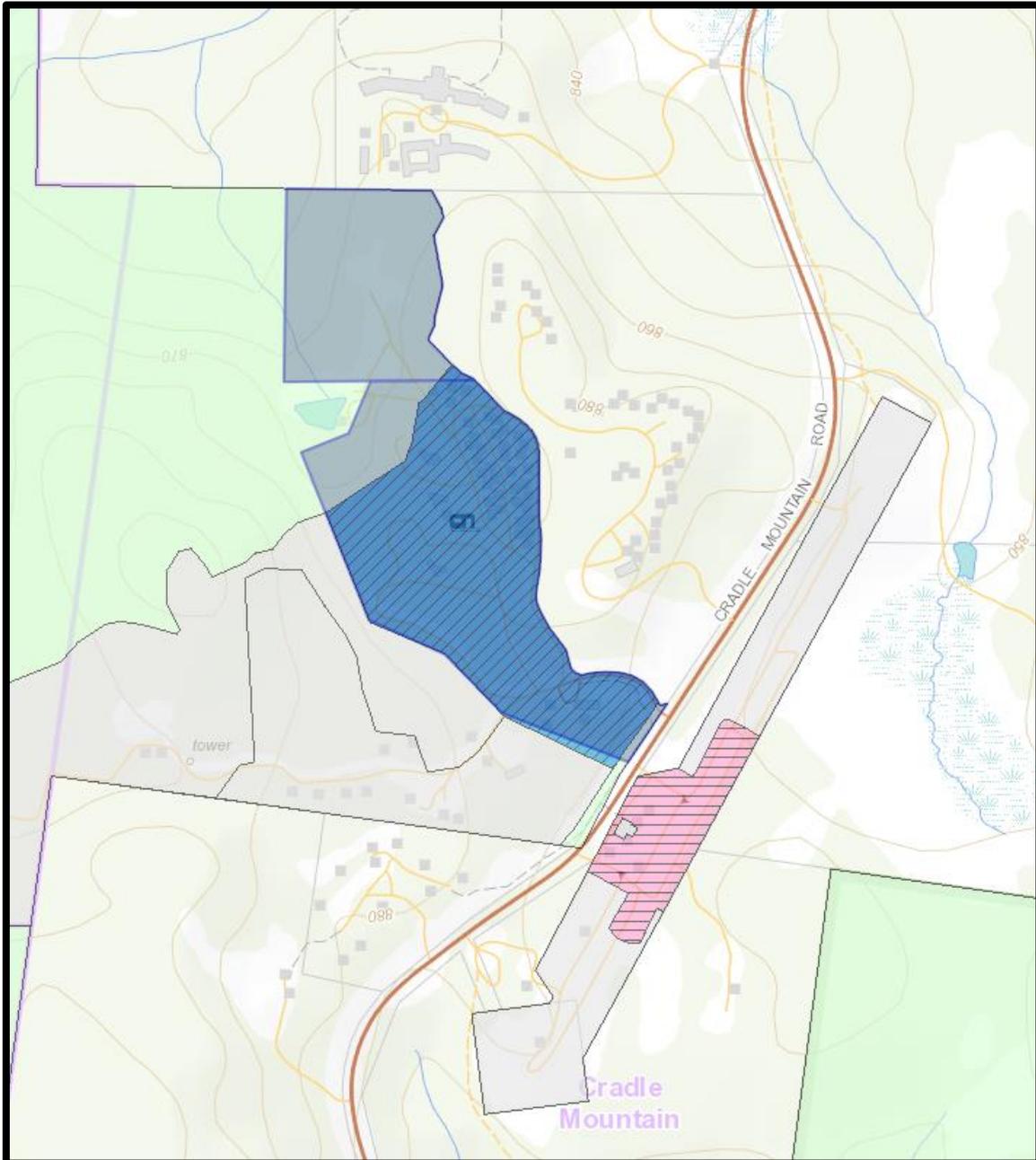
### **6.3 Recreational Standards Framework**

The Recreational Standards Framework (RSF) is a PWS tool for determining the location of visitor sites and services in consideration of risk management, visitor management and finance management. The RSF is a mapped representation of the level-of-service delivery.

Aside from a small area at Lake Lea, there are no other areas, within suitable distance, on parks land, that provide areas for camping and accommodating visitors. Easy access camping is not provided in the TWWHA.

There is demand for the provision of affordable accommodation services which cater to a broad scale of visitor types to the nearby TWWHA, including Cradle Mountain.

It is appropriate that the RSF zone of Easy Access Camping (Complex) is extended to include the proposal's footprint



**Figure 3 RSF zoning of the DHPCM. Blue hatched - Easy Access Camping (Complex), Green – Not managed for Visitor Services, Pink hatched – Day Use Comfort (Visitor Centre), Grey – Management Use.**

**Table 5: Summary of RSF categories on the proposal site.**

<b>RSF Category: Easy Access Camping (Complex)</b>
Existing infrastructure and cabins, and the new powered and unpowered sites, some cabins.
<b>RSF Category: Not Managed for Visitor Services</b>
Remaining cabin sites.

# 7. Evaluation of environmental impacts

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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 proponent for implementing the proposal, are discussed, including:

- flora and fauna;
- visual impacts; and
- water.

The EAR also looks at the remaining issues raised by the submissions, and how potential impacts are avoided or mitigated.

## 7.1 Flora and Fauna

### Values and Potential Impacts

#### Clearing

The proposal would clear a vegetation area between 2.2ha and 4.5ha. The final clearance footprint will be informed by the BHMP. The area to be cleared contains a mosaic of vegetation communities but is primarily *Eucalyptus delegatensis* forest (wet and dry) and *Eucalyptus coccifera*. There are small areas of rainforest vegetation on the western fringes of the proposal footprint.

The proposal footprint contains no TNVC. The lake in the western portion of the proposal footprint is listed as a TNVC (39 - Wetland) but will not be directly impacted by the proposal.

The field survey of the site found one listed Threatened Species, Alpine violet (*Viola cunninghamii*), listed as rare under the TSP Act, and not listed under the EPBC Act.

Natural Values Atlas records show, historically, the Spotted-tailed quoll (*Dasyurus maculatus subsp. maculatus*) has been recorded in the project area. The field survey of the site found two burrows, with the potential to provide habitat for the Spotted-tailed or Eastern quoll (*Dasyurus viverrinus*) or Tasmanian Devil (*Sarcophilus harrisii*).

- The Spotted-tail quoll is listed as rare under the TSP Act, and vulnerable under the EPBC Act.
- The Eastern quoll is listed as endangered under the EPBC Act, and is not listed under the TSP Act.
- The Tasmanian Devil is listed as endangered under the TSP Act and the EPBC Act.

The field survey found that both burrows showed evidence of use by the common Wombat (*Vombatus ursinus*), due to the presence of scats. No threatened birds are likely to occur in the project area.

The field survey also mapped hollow-bearing trees, and several non-threatened fauna species were present that may utilise the tree hollows. There is the potential for these species to be displaced due to the proposal.

## **Biosecurity**

No evidence of *Phytophthora cinnamomi* (root rot fungus) or significant priority weeds (as classified under the *Weed Management Act 1999*) have been recorded in the proposal footprint, nor were any found during the field survey.

There is a risk that machinery and imported material could introduce *Phytophthora* or other weeds to the site. Once operating, there is the ongoing risk that visitors could introduce biosecurity risks to the site. As the field survey shows, the existing DHPCM has not resulted in an influx of weed species or biosecurity risks to the surrounding environment. The ongoing monitoring and supervision of the site means that emerging biosecurity threats can be suppressed.

## **Vehicle Movements**

During construction, and the life of the proposal, there is the risk of fauna strikes from vehicle movements. Several submissions raised concerns with the potential for more frequent fauna strikes due to an increase in frequency of vehicle movements associated with the increased capacity of the DHPCM. It is accepted that there is a very low risk of fauna strikes within the DHPCM. The roads within the park are not conducive to vehicles travelling at high speed, and it is likely a driver would have adequate time to spot and avoid striking fauna. Roads within the park are sign-posted with low speeds, are narrow, are surrounded by people, and are under the supervision of staff.

Submissions stated that due to the increased capacity of accommodation at the DHPCM, the number of people travelling to and from the DHPCM would increase. Whilst there would be some increase in traffic numbers, it is likely that many persons who elect to stay within the expanded DHPCM would be staying local to the park, for a multi-day visit, rather than travelling to or from accommodation further from the park. Rather than travelling to Cradle Mountain at dawn from accommodation or home, persons can, instead, stay overnight beforehand and avoid the need to travel at dawn. Furthermore, people would be able to stay locally to Cradle Mountain instead of travelling at dusk to other accommodation, or returning to home. It is considered that the potential additional vehicle trips is unlikely to match the additional persons capacity at the DHPCM.

Staff and signage at the DHPCM will also inform visitors of the risks of fauna strike when driving at dawn and dusk.

Decisions on speed limits and other fauna strike avoidance methods on the roads to and from Cradle Mountain are outside the scope of approvals considered for this proposal.

## **Lighting and noise**

Submissions raised concerns with the potential for lighting and noise affecting fauna.

Lighting standards are set by the planning requirements of the local council. It is accepted that the proposal does not include unnecessary lighting, and that the lighting is adequate for visitor safety.

Noise generated from construction activities is not considered significant, and is temporal. The proposal will be undertaken in stages, thus reducing the number and extent of noise source emissions at any one time. Therefore, the potential to disrupt fauna and visitors with noise from work undertaken is not significant. Helicopters will not be used as part of the works.

A greater number of visitors has the potential to increase the noise emissions from the proposal. The proposal extends the existing noise source (DHPCM). The extension is not isolated from existing development. Other accommodation services adjoin the

DHPCM to the south and north, and the Visitor Services Centre is located directly to the east. Species which are perturbed by anthropogenic noise are likely to already avoid the area, and it is considered that the noise from the expansion of the DHPCM would have a negligible additional impact on fauna. The field surveys show that several species were present in areas near the existing DHPCM. There is unlikely to be a significant change in the impact to fauna species from any additional noise generated from the increased capacity.

### **Management Measures Proposed**

The proponent has provided commitments and management actions as part of the final EIS. Commitments relevant to the flora and fauna issues raised have been included below. A complete set of commitments can be found in Appendix 1 of this report.

Commitments address:

- pre-clearance surveys, and seeking necessary associated permits to disturb;
- marking areas of no-go zones;
- prepare and implement a Construction Environmental Management Plan (CEMP);
- protection of work area from wildlife entry, avoid leaving open excavations and fauna catcher to be present during clearing works;
- priority to use material onsite and any imported material from an operation certified as weed and *Phytophthora* free;
- hot works prohibited in certain weather conditions;
- helicopters prohibited from use for the purposes of construction;
- cleared vegetation, particularly hollow bearing timber, to be re-used in rehabilitation, along with indigenous species; and
- ongoing monitoring for weed and biosecurity threats during operation.

Relevant commitments are:

**2A-2E, 2G-2I, 3A-3C, 3E-3H, 3K, 3M, 4G, 5A-5C**

### **Submissions**

Submissions raised concerns with the following:

- the footprint of the proposal – too large;
- the location of the proposal – should be on private not public land;
- the ability for species impacted to persist in the area;
- habitat and biodiversity loss;
- fragmentation;
- biosecurity;
- noise;
- lighting; and
- cumulative Impacts.

## Evaluation

- The footprint of the proposal

The size of the disturbance, 4.5ha (maximum), represents a fraction of the area of the VoBCA (listed as 4,271ha). The proposal would be carried out in stages, with areas only cleared as necessary. It is considered that the proposal footprint is adequate for the purpose.

- The location of the proposal, fragmentation, noise and lighting

The proposal is located adjacent to the existing DHPCM and is bounded by other accommodation services to the north and south. To the west of the proposal is an extensive corridor of reserved land which features large tracts of excellent quality forest mosaic, and a mixture of regrowth and old growth forest with a structural diversity that provides high value habitat. The proposal would not fragment nor intrude into this corridor, and instead consolidates impacts to the existing accommodation services area. The area of the proposal is likely to be used for foraging rather than nesting or denning.

The proposal is sufficiently distanced from the TWWHA to avoid impacting the outstanding universal values, including the wilderness of the TWWHA.

The DHPCM is managed by DHP on behalf of the PWS. As the facility purpose is as a low-cost accommodation facility, it is located on CA land consistent with the objective of a CA. Locating any expansion away from the existing site would significantly increase the accommodation costs to recover the costs of infrastructure, and result in disturbance to new areas. By connecting to the existing site, the disturbance to values in the area is minimised.

Locating the proposal close to the tourism destination of Cradle Mountain has the potential to reduce vehicle trips to and from the area, as persons would have greater availability of low-cost accommodation close to Cradle Mountain.

- The ability for species impacted to persist in the area

It is considered the proposal would have no significant impact on the ability for species impacted to persist in the area. The extent of clearing is a very small fraction of the vegetation community types found throughout the surrounding area. The proponent has committed to adjusting the proposal layout and footprint to avoid impacts to threatened species. The proposal would not have a significant impact on the ability of species to persist in the area.

- Habitat and biodiversity loss, biosecurity issues

An area of up to 4.5ha of flora and habitat is to be cleared due to the proposal. As the proposal would increase available accommodation, it has the potential to reduce habitat destruction and biodiversity loss likely to occur elsewhere in the reserve from camping in locations unattended by PWS staff. There is the risk for unattended fires, damage from vehicles driving into areas susceptible to damage, and the introduction of biosecurity threats such as weeds or Phytophthora. Through the consolidation of camping and accommodation areas, habitat and biodiversity throughout the remainder of the reserve can be better protected. The field surveys found the existing DHPCM had been successful, to date, in minimising weed incursions and biosecurity threats to the areas surrounding the DHPCM.

The habitat and biodiversity types lost in the proposal footprint are prevalent elsewhere in the CA and other surrounding reserved land.

The proposal would not result in a significant loss of habitat or biodiversity.

- Noise and Lighting

The proposal is within a consolidated area of existing noise and lighting impacts from other accommodation and visitor services facilities. It is considered the proposal would not significantly increase the noise and lighting impacts to fauna

- Cumulative Impacts

Within the VoBCA there has been very little development to date. PWS facilities within the VoBCA include some limited facilities at Lake Lea, including a camping area (no amenities) and boat ramp, and the existing DHPCM area.

The proposal would primarily be utilised by visitors to the TWWHA. The location outside of the TWWHA supports the minimisation of impacts to the outstanding universal values of the TWWHA, and locating supporting infrastructure outside of the TWWHA.

The proposal's contribution to cumulative impacts is considered to be very low. The proposal would not introduce significant new impacts to the VoBCA. The cumulative impacts of greater numbers of visitors to the TWWHA is managed through the TWWHA MP. That assessment is outside the scope of this proposal and its assessment.

**Conclusion**

The public submissions raised natural value impact concerns. The commitments to be imposed would mitigate and manage the potential impacts to flora and fauna values. Whilst a small area of reserved land will be utilised for the proposal, this is balanced against the benefits the proposal offers to the community and the broader reserved land network. The commitments outlined in Appendix 1 provide sufficient impact mitigation.

## 7.2 Visual Impacts

**Values and Potential Impacts**

Visitors to the Cradle Mountain area are seeking an escape from the built environment. The proposal has the potential to impact on viewsheds, including those from key lookouts in the TWWHA.

**Management measures and commitments proposed**

The proponent has outlined commitments and management actions as part of the final EIS. Commitments relevant to visual impacts are listed below. A complete set of commitments can be found in Appendix 1 of this report.

- use of natural vegetation to be used to screen built forms; and
- colours and materials will be non-reflective and with matt finish that does not contrast with the surrounding natural environment.

Relevant commitments are:

**3J, 3L**

**Submissions**

Submissions raised concerns with:

- the proposal being visible from viewpoints in the TWWHA; and
- the proposal's contribution to light pollution.

<b>Evaluation</b>
<p>The proponent provided a viewshed analysis study for the proposal. The study found that the proposal would not be discernible from key viewpoints in the TWWHA.</p> <p>The proposal was found to be visible from Cradle Mountain Road; however, in the context of the existing development, there was little discernible change to the viewshed.</p> <p>It is accepted that the shape and exterior finishes of cabins is appropriate for the location. Where infrastructure is located, such as rainwater tanks, it is planned to locate these away from accommodation areas, and that they be adequately screened/hidden.</p> <p>Lighting is as per council requirements, and for visitor safety. It is considered the proposal would not make a significant contribution to light pollution when viewed in the context of the existing surrounding development.</p>
<b>Conclusion</b>
<p>The proposal would not affect viewsheds from the TWWHA, and therefore would not affect the wilderness quality of the TWWHA.</p>

## 7.3 Water

<b>Values and Potential Impacts</b>
<p><b>Watercourses</b></p> <p>Water values specific to the proposal are those associated with Black Bog Creek, flows into the Iris River, and flows into Lake Gairdner, west of Moina.</p> <p>Runoff from the DHPCM would not flow towards the TWWHA. Overland flow drains towards the lake on the western side of the site and the unnamed tributary flowing into Black Bog Creek. Within and adjacent to Black Bog Creek are areas of TNVC (Highland Poa grassland and Sphagnum peatland).</p> <p>The proposal has the potential to generate additional runoff from the increase in hard surfaces. The roof area of the DHPCM would increase by up to ~4,370m<sup>2</sup> due to the proposal. The proponent is also considering sealing some internal roads to reduce their susceptibility to being washed out or developing erosion issues from vehicle use when wet.</p> <p>Runoff has the potential to carry pollutants and sediments to watercourses.</p> <p><b>Water Supply and wastewater disposal</b></p> <p>The proposal would also require more water and generate more wastewater. It is anticipated peak daily water demand would increase by ~39kL to ~85kL once all stages are completed. Unmanaged there is the potential for significant damage to waterway values either through the over-harvesting of water for use, or the release of untreated water into the receiving environment. This could potentially affect downstream users of the water, and the quality of water supporting downstream users.</p>
<b>Management measures and commitments proposed</b>
<p><b>Watercourses</b></p> <p>The proposal would not directly interfere with waterways such as watercourse crossings, or the pumping of water from watercourses or underground aquifers. Cabins 5-15 will be built elevated, with a joining boardwalk and separated car parking area to reduce potential impacts to the area during wet weather.</p>

## **Water supply**

PWS supply potable water to the proponent. The proponent is aware that supply is subject to seasonal impacts, particularly in summer when precipitation is lower and visitor numbers are highest. The proponent is aware that the DHPCM should work towards minimising the volume of water imported to site from local PWS storages.

The proponent has proposed to increase the harvest of rainfall from building rooves to supplement water supply needs and to reduce the volume of water contributing to overland flow. It is understood the preferred method is to direct runoff from rooves to central collection points where it is then fed into the DHPCM's water supply, rather than install individual rainwater tanks on each cabin. This has the potential to supply ~26kL of potable water per day, on average.

The proponent also has the option of taking delivery of water from the Sheffield Water Treatment Plant.

TasWater has approved the proponent sourcing water from the TasWater Cradle Mountain recycled water reservoir for toilet flushing use. This approval was provided via the planning permit. This option could potentially supply up to 1/3 of water (~27kL per day) usage at the DHPCM.

The proponent has committed to water conservation principles. Visitors will be encouraged to bring their own drinking water.

The proposal has provided for fire-fighting water requirements of 10kL per building, up to 150kL total hydrant supply. TasWater is supportive of the use of the TasWater re-use reservoir as being the source of this water. The reservoir is always kept at a minimum of 432kL and is therefore sufficient for emergency use in the event of bushfire. A connection from the reservoir will be required to be installed.

Take of underground water will not be permitted. Whilst undertaken by surrounding landholders, the proponent has not provided information assessing the potential impacts of taking underground water.

Wastewater will continue to be sent to the local TasWater treatment plant via the TasWater sewage pump station onsite. There is sufficient capacity for the expanded DHPCM within the existing infrastructure.

## **Commitments**

The proponent has outlined commitments and management actions as part of the final EIS. Commitments relevant to the issues raised above are listed below. A complete set of commitments can be found in Appendix 1 of this report.

- provision of water for fire-fighting supply, connection with TasWater recycled water reservoir;
- no increase to the quantity of water required from the PWS;
- implementation of water conservation practices, capture of roof runoff for re-use, minimise quantity of potable water imported to site; and
- regular checks of drains and roads for evidence of erosion or scouring, and prompt actions to address.

Relevant commitments are:

**3I, 4B-4E**

## Submissions

Submissions raised concerns with:

- impacts to water quality and catchment hydrology;
- increase in water use, and subsequent increase in wastewater disposal;
- future demands for water;
- impacts of climate change;
- groundwater extraction; and
- fire-fighting water supply.

## Evaluation

### Water Quality in receiving environment

It is accepted that the proposal would not adversely affect the receiving environment of the local waterway. The proposal is committed to implementing strategies for the reduction of erosion and scouring. Whilst the proposal would increase the area of hard surfaces, the potential harvesting of rainfall for use would reduce the volume of overland flow generated and released from the site.

The re-use of treated water within the DHPCM has the potential to reduce the volume of clean water input, and therefore reduce the quantity of treated water generated. This also has the potential benefit of reducing the quantity of treated water released into the receiving environment from the TasWater treatment plant.

### Water Supply and wastewater

The EIS recognises that due to the proposal's remote location, water supply strategies are required to ensure security of water supply to the DHPCM. Whilst submissions raised concerns with the proponent not making a final determination of water supply method, it is acknowledged that water supply will need to be flexible and multi-sourced, addressing a hierarchy of options. The proposal would satisfy water demands without additional water supply from the PWS.

The proposal can meet fire-fighting supply requirements through the agreement with TasWater.

The proposal will be undertaken in stages to provide continuous evaluation of water strategies and determine whether demand is adequately met through the supply available. A stage will not proceed if adequate water supply cannot be guaranteed, or TFS requirements cannot be met. However, the proponent has demonstrated that there are means for achieving the full development without requiring further water sources from the PWS.

Other matters related to water are outside the scope of this assessment and have been resolved by the local council and TasWater.

### Climate Change

Climate change may impact future water supply. Climate change has the potential to reduce precipitation in the Cradle Mountain region. The PWS is currently investigating means of increasing water supply capacity for the Cradle Mountain Visitor Services Zone (including the DPHCM) to maintain the current, and potentially increase, potable water supply.

## **Conclusion**

The proposal would not significantly impact on the quality of waters in the receiving environment downstream of the proposal.

It is accepted that the proponent can provision the necessary water quantity over the life of the proposal without relying on the PWS water supply greater than the current quantity provided.

## **7.4 Other Issues**

### **Aboriginal Heritage**

An Aboriginal heritage survey of the site was undertaken. There are two artefact records within the proposal footprint, but surveys could not relocate the items. Additional survey work did not locate other Aboriginal heritage. The geology of the area was determined to be unsuitable for artefact manufacturing.

AHT determined that no permit was required, and that works be carried out in accordance with a UDP.

No submissions raised concerns with Aboriginal heritage.

Commitments have been included in Appendix 1 which require a UDP be in place, staff briefed on requirements of a UDP and the potential for artefacts in the area, and to operate with a 5m buffer to the two recorded sites.

Relevant commitments are:

**2F, 2I, 3D**

### **Waste**

The proposal would increase the quantity of waste generated onsite due to an increased number of visitors.

The proponent will continue to implement a waste hierarchy. Waste hierarchy guidance information is available from the Tasmania Environment Protection Authority (EPA) and the Victoria EPA. Solid waste will be segregated onsite into waste and recyclables, and both streams collected and removed from site.

All construction wastes will be removed from site upon completion of each stage. Construction waste is not expected to be hazardous and will primarily be pallets, plastic, cardboard, offcuts, cement, and scrap metal.

Relevant commitments are:

**3M, 4H**

# 8 Statement of Reasons

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This EAR is based on the information provided in the EIS and incorporates advice provided by DPIPWE specialists and PWS regulatory staff. This assessment also addresses the issues raised in specialist advice and public submissions.

This Statement of Reasons is a summary of assessment criteria relevant to the proposal and how the criteria were considered by the delegated authority.

## 8.1 Assessment Criteria

### ***Nature Conservation Act 2002***

The proposal is consistent with the purpose of reservation for CAs, listed in Schedule 1 of the NC Act. The proposal would not significantly impact the natural and cultural values of the VoBCA.

### ***National Parks and Reserves Management Act 2002***

The proposal has been assessed against the management objectives for CAs. The proposal furthers objective (I) and is not inconsistent with the other management objectives of Schedule 1 for CAs.

### ***Crown Land Act 1976 (CLA)***

Where the proposal impacts Crown land, it is not inconsistent with the CLA or its subordinate legislation. The 750mm wide corridor of Crown land (Title Ref 141718/2) can be set aside to be included as part of Cradle Mountain Road.

### ***Tasmanian Reserve Management Code of Practice 2003***

The Code of Practice was considered in determining the appropriateness of the proposal. The proposal aligns with the Code of Practice's guidance on visitor services and infrastructure.

### **Recreational Standards Framework**

The RSF was considered in determining the appropriateness of the proposal, in particular the availability of an equivalent visitor services in the surrounding area, and the compatibility of the proposal with other visitor services in the area.

### ***Kentish Council Interim Planning Scheme 2013***

The proponent has been issued a planning permit for the proposal as described in the EIS (section 1.6.2 and 3). The Kentish Council determined that the proposal was consistent with the planning scheme, including the Sustainable Tourism Precinct Specific Area Plan.

### ***Environment Protection and Biodiversity Conservation Act 1999***

The proponent determined the project did not have a significant impact on MNES.

## 8.2 Limitations of Assessment

This decision has been informed by the information presented in the final EIS. Further approvals are required, including from the TFS and council building and plumbing permits. Should the proposal be significantly changed, an amended EIS would be required, and a new recommendation sought from the PWS.

# 9. Decision

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I am satisfied that:

1. The proposal is acceptable because:
  - the EIS under the identified assessment criteria demonstrates that the proposal would not cause significant environmental impacts;
  - the matters raised in the public submissions have been addressed in the proponent's Submission Report and final EIS, and sections 5, 6, 7 and 8 of this EAR;
  - the proposal aligns with the purposes for reservation under the NC Act and the reserve management objectives for CAs stated in Schedule 1 of the NPRM Act;
  - the proposal would provide affordable visitor accommodation facilities close to the major tourism destination of Cradle Mountain. It would encourage appropriate tourism, recreational use and enjoyment in the VoBCA and other reserved land in the surrounding area;
  - the proposal would not be inconsistent with any of the management objectives for the VoBCA; and
  - the proposal would not have a significant impact on reserved land in the area, including the TWWHA.
  
2. The proposal can be implemented in accordance with the commitments stated in Appendix 1 of this report.



Jason Jacobi  
**DEPUTY SECRETARY**  
**PARKS AND WILDLIFE SERVICE**

Date: 24 May 2021

The EIA process is completed when the managing authority signs this EAR and provides it to the PWS Regional Manager Northwest.

# Appendix 1: Commitments

No.	Commitment	Project Phase
<b>Life of project</b>		
1A	<p><b>Expiry of EIA for RAA 3578</b></p> <p>The EIA for RAA 3578 is valid for consideration of conditions for the life of the proposal.</p> <p>However, a further EIA for RAA 3578 must be sought for consideration of amended conditions if:</p> <ul style="list-style-type: none"> <li>a) construction is not commenced within three years of the date of signature of the EAR for RAA 3578; or</li> <li>b) the proposal is amended in a way which significantly changes the proposal*.</li> </ul> <p><i>*Note: a significant change is a change of &gt;15% in the scale, size or intensity of the proposal. Where uncertain if the change is significant, consult with the PWS.</i></p>	Life of project
1B	<p><b>Notification of incident</b></p> <p>The lessee must report any suspected breaches of commitments as soon as practicable and no later than 24 hours of becoming aware of the matter.</p> <p>The report must be made to the PWS Regional Manager Northwest.</p> <p>The report may be initially verbal; however, written notification must be provided within 48 hours of becoming aware of the breach.</p> <p>The written notification must provide details including, but not limited, to:</p> <ul style="list-style-type: none"> <li>a) date, time;</li> <li>b) suspected cause of breach;</li> <li>c) likely environmental harm caused; and</li> <li>d) the steps taken or to be taken to resolve the breach.</li> </ul>	Life of project
1C	<p><b>Follow PWS directions</b></p> <p>The PWS may direct the lessee to carry out actions when necessary and desirable to prevent or mitigate environmental harm.</p>	Life of project

<b>Pre-Construction</b>		
<b>2A</b>	<p><b>Pre-clearance disturbance surveys</b></p> <p>Complete, and submit to the PWS, a pre-clearance survey of the works area for threatened fauna and flora species in accordance with DPIPWE's <i>Guidelines for Natural Values Surveys – Terrestrial Development Proposals 2019</i>. The survey must be undertaken by a suitably qualified and experienced person.</p>	Pre-Construction
<b>2B</b>	<p>Complete, and submit to the PWS, details of the location of <i>good quality habitat trees*</i> that will be removed and retained as part of the proposal.</p> <p>*Note: A good quality habitat tree is defined in, "<i>Tree Hollows in Tasmania a guide</i>" (specifically Appendix 2)  <a href="http://fpop.fpa.tas.gov.au/publications/hollows%20booklet%20web.pdf">http://fpop.fpa.tas.gov.au/publications/hollows%20booklet%20web.pdf</a></p> <p>Retaining as many mature and habitat trees as possible at the site is to be commended. However, individual mature trees are subject to extra stresses, especially wind, which can cause turbulence and affect the long-term stability of these individual tall trees as noted in the EIS. Where possible, 'clumps' of mature and habitat trees should be retained to minimise such stress.</p>	Pre-Construction
<b>2C</b>	<p>The PWS may, due to the survey results, direct the authority holder to amend the proposal layout to avoid impacts to wildlife habitat or threatened flora.</p> <p>All sites are to be marked by the proponent and inspected by a PWS representative prior to clearing works to consider and negotiate opportunities for the aggregation of some camping sites in lieu of smaller areas of clearance for individual campsites which would cause greater fragmentation of vegetation and habitat.</p>	Pre-Construction
<b>2D</b>	<p>Any threatened plants or habitat found are to be flagged and marked whether approval has or has not been given to disturb.</p>	Pre-Construction
<b>2E</b>	<p>Where impacts to threatened flora or any native wildlife habitat cannot be avoided, necessary approvals must be sought and obtained before commencing works.</p> <p>This may include:</p> <ul style="list-style-type: none"> <li>a) permit to take threatened flora, such as <i>Viola cunninghamii</i>, as per the TSP Act; and</li> <li>b) permit to disturb native fauna as per the NC Act.</li> </ul>	Pre-Construction
<b>2F</b>	<p><b>Aboriginal heritage</b></p> <p>Recorded location of two artefacts within the lease area are to be marked, and no works to occur within a 5m radius. Marks to be removed after construction.</p>	Pre-construction

<b>2G</b>	<p><b>Disturbance area</b></p> <p>Area of the disturbance to be marked prior to ground disturbance.</p>	Pre-construction
<b>2H</b>	<p><b>Construction Environmental Management Plan</b></p> <p>A CEMP must be submitted to the PWS at least 15 working days before ground disturbance is planned to occur.</p> <p>The CEMP must be in accordance with PWS guidelines and include, but is not limited, to:</p> <ul style="list-style-type: none"> <li>a) Final Site Plan: <ul style="list-style-type: none"> <li>a. identifies the extent of clearing; and</li> <li>b. demonstrates how visual impact has been considered, including how the vegetated visual character of the site has been retained.</li> </ul> </li> <li>b) Works program and timing of activities: <ul style="list-style-type: none"> <li>a. how visitor disturbance will be minimised.</li> </ul> </li> <li>c) Protocols and methods for containing impacts within the construction site footprint.</li> <li>d) Dust and air pollutants minimisation and management strategies.</li> <li>e) Protocols to meet noise limit requirements.</li> <li>f) Sediment and Erosion Control Plan, outlining steps for minimising the risk of scouring and erosion, and details of water management protocols.</li> <li>g) Protocols for biosecurity and corrective actions in accordance with: <p style="margin-left: 40px;"><i>DPIPWE's Weed and Disease Planning and Hygiene Guidelines 2015.</i></p> </li> <li>h) Bushfire risk mitigation and response strategies.</li> </ul> <p>Note that where the CEMP references other plans and documents, those plans and documents are to be made available with the CEMP.</p>	Pre-construction
<b>2I</b>	<p><b>Contractor briefing</b></p> <p>All contractors to be informed of their obligations:</p> <ul style="list-style-type: none"> <li>a) under the AH Act and the UDP; and</li> <li>b) to avoid unnecessary impacts to fauna and flora, including areas flagged for protection.</li> </ul>	Pre-construction
<b>2J</b>	<p><b>Visitor Safety and Communication</b></p> <p>The lessee must:</p> <ul style="list-style-type: none"> <li>a) provide suitable separation between visitors and the works area;</li> <li>b) advise persons, when booking, there is the potential for disruptions from works being undertaken; and</li> </ul>	Pre-construction

	c) advise visitors, on arrival, of works being undertaken in the forthcoming days.	
<b>2K</b>	<b>PWS Permission</b> Works may only commence when the PWS has provided written consent to the lessee.	Pre-construction
<b>Construction Commitments</b>		
<b>3A</b>	The lessee must complete construction of the proposal in accordance with the CEMP and site plan that was submitted to the PWS prior to commencement of construction.	Construction
<b>3B</b>	The lessee is permitted to clear existing vegetation up to an area of 4.5ha.	Construction
<b>3C</b>	<b>Hours of works</b> Works, excluding machinery operation, must only take place, Monday to Friday 7:30AM to 6:00PM. Machinery operation must only take place, Monday to Friday 9:00AM to 6:00PM. The PWS may authorise machinery operations outside of these hours where there is operational requirement for extended hours.	Construction
<b>3D</b>	<b>Aboriginal heritage</b> A UDP must be implemented when carrying out works.	Construction
<b>3E</b>	<b>Fauna</b> Measures are to be put in place to discourage wildlife from entering works area. Avoid leaving open excavations while site is unattended.	Construction
<b>3F</b>	The handling of wildlife is to be avoided where possible, except in the event of an emergency. Report injured wildlife to the PWS.	Construction
<b>3G</b>	<b>Biosecurity and weeds</b> Priority to be given to using materials from within the works area. Where soil, rock or gravel is sourced from offsite, it must be from a provider certified as Phytophthora and weed free.	Construction
<b>3H</b>	<b>Fire</b> Hot works are to be suspended immediately once the Forest Fire Danger Index (FDI) is calculated as equal to or greater than HIGH 20, or the relative humidity is equal to or less than 30%. Hot works will not resume until the Forest FDI has dropped below HIGH 20, or the relative humidity risen above 30%. Suitable extinguishers held onsite for potential electrical or fuel fires.	Construction

	*Note: Hot work includes the use of grinders, welders, brush cutters, chainsaws, earthmoving equipment and other tools and equipment likely to create sparks.	
<b>3I</b>	<p><b>Roads</b></p> <p>Any new internal roads or improvements to roads must meet the Local Government Association Tasmania's standard specification <i>Tasmanian Standard Drawings Release Version May 2020</i>.</p> <p>Note: Specifications available from:  <a href="https://www.lgat.tas.gov.au/_data/assets/pdf_file/0046/67978/9/Tasmanian-Standard-Drawings-Release-Version-May-2020.pdf">https://www.lgat.tas.gov.au/_data/assets/pdf_file/0046/67978/9/Tasmanian-Standard-Drawings-Release-Version-May-2020.pdf</a></p>	Construction
<b>3J</b>	Light-coloured pavement to be used in the construction of areas of new road infrastructure.	Construction
<b>3K</b>	<p><b>Visual</b></p> <p>Colours and materials of building material will be non-reflective and with matt finish that does not contrast with the surrounding natural environment.</p>	Construction
<b>3L</b>	<p><b>Helicopters</b></p> <p>Helicopters are not permitted to be used to deliver material, or as part of the construction work, without prior authority from the PWS.</p>	Construction
<b>3M</b>	<p><b>Clean-up</b></p> <p>All waste from construction is to be removed from site at the completion of works.</p>	Construction
<b>Operational Commitments</b>		
<b>4A</b>	<p><b>Dangerous Trees</b></p> <p>The lessee is responsible for the management of dangerous trees within the lease area.</p>	Operational
<b>4B</b>	<p><b>Water</b></p> <p>The lessee acknowledges and agrees that the lessee is responsible for ensuring adequate water supply is available to service the lessee's Development and the use of the Leased Area for the Approved Use or the Term of the Lease.</p> <p>The lessee must connect the Leased Area to the Tasmanian Water and Sewerage community reticulated water scheme, at the lessee's cost, within 12 months of being notified that such a scheme is available.</p>	Operational
<b>4C</b>	<p>The lessee must:</p> <ul style="list-style-type: none"> <li>a) minimise the amount of potable water required onsite;</li> <li>b) maximise the re-use of stormwater runoff; and</li> <li>c) apply water conservation principles, particularly in the summer months.</li> </ul>	Operational

<b>4D</b>	The lessee must ensure the required amount of water for fire-fighting is provisioned in onsite tanks or via connection to the TasWater recycled water supply.	Operational
<b>4E</b>	<b>Erosion</b> The lessee must monitor conditions of drains and roads onsite. Results of visual inspection and corrective actions must be recorded after significant rainfall (>50mm). The lessee must take timely action to resolve current or emerging erosion and scouring issues.	Operational
<b>4F</b>	<b>Signage</b> Signage is to be installed onsite which informs visitors: a) to look out for wildlife when driving; b) to slow down at dawn and dusk on surrounding roads; c) to minimise waste; d) to minimise water use; and e) to boil water before drinking.	Operational
<b>4G</b>	<b>Weeds and biosecurity</b> The lessee is responsible for ensuring risks to flora health, including weeds, do not become established within the site.	Operational
<b>4H</b>	<b>Waste</b> Waste is to be managed as per the waste hierarchy (Tasmania EPA). Waste must not be disposed of onsite. Waste awaiting removal must not be accessible by wildlife.	Operational
<b>Rehabilitation Commitments</b>		
<b>5A</b>	Where it is safe to do so, cleared vegetation, particularly that bearing hollows, should be placed in the surrounding area rather than be mulched or removed from site.	Rehabilitation
<b>5B</b>	Indigenous species must be used in rehabilitation.	Rehabilitation
<b>5C</b>	Where an area of disturbance is no longer required it must be rehabilitated as soon as practical, and no longer than six months after use of the area has ceased.	Rehabilitation

#### Definitions

Term	Definition
<b>Proposal</b>	The works and outcomes described in the final EIS and the EAR.



## CONTACT DETAILS

### **Tasmania Parks and Wildlife Service**

GPO Box 1751

Hobart, Tasmania, 7001

1300 TASPARKS (1300 827 727)

[www.parks.tas.gov.au](http://www.parks.tas.gov.au)



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DEPARTMENT OF PRIMARY INDUSTRIES, PARKS,  
WATER AND ENVIRONMENT