



Discovery Holiday Parks
Discovery Cradle Assessment Phase
Submission Report

March 2021

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Appendix A – Representations

1. Introduction

This submission report has been prepared by GHD Pty Ltd, on behalf of Discovery Holiday Parks. The report has been prepared at the request of Parks and Wildlife Services (PWS) to accompany their final Environmental Assessment Report for the expansion of the Discovery Holiday Park at Cradle Mountain.

The Environmental Impact Statement was advertised for public consultation and submissions from 6 May – 3 June 2020. This document has been prepared based on the documents from the public exhibition and provided to the applicant on the 3 July 2020.

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The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

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2. Public submissions

Copies of the 9 Submissions received are attached in the appendix to this report. Names of private individuals have been redacted for privacy reasons.

Table 1 Submissions

No	Name	Individual submission or company name
1	Private Individual	Individual
2	Private Individual	Individual
3	Private Individual	Individual
4	Heather Newman	President, Circular Head Walking Club
5	Malcolm Wells	Chair, National Parks and Wildlife Advisory Council
6	Nicholas Sawyer	President, Tasmanian National Parks Association Inc.
7	Private Individual	Individual
8	Scott Jordan	Bob Brown Foundation
9	Private Individual	Individual

3. Analysis of public submissions

Key topic	Comments	RAA EIS response	Public submission
Management objectives for Conservation Areas, Schedule 1 of the <i>National Parks and Reserves Management Act 2002</i> - the final EIS should explicitly address the management objectives for conservation and sustainable use.	The EIS has been updated to respond to specific objectives of the NPRM Act.	Section 3.2.4	1, 4, 8
Cumulative effects, including scale of development, increasing visitors, and decreasing wildlife habitat - the final EIS should address quantitatively, the expected changes in visitor numbers to the site, Cradle village, and Conservation Area. The habitat impacted should be quantified relative to the existing habitat.	<p>The application has been prepared with regard to all Local and State regulatory mechanisms in relation to land use and development, and natural values. There is currently no regulatory framework for the assessment of cumulative impacts.</p> <p>The EIS has been updated to include comment in relation to cumulative impacts. Ecological assessment of the proposal finds that 'the proposed expansion and associated selective vegetation clearance at the site is not likely to have a significant impact on the broader representation, quality or persistence of these vegetation types in the valley, nor the broader Cradle Mountain region'</p> <p>The proposed development is situated within the Gradle Gateway that has been endorsed by PWS, State and Local Government as an appropriate location for the focus for development for visitors to the area and permits and encourages expansion of use and development for visitor facilities.</p>	<p>Section 5.4</p> <p>Section 3.1.2</p>	5, 9

Key topic	Comments	RAA EIS response	Public submission
Potential impacts to threatened <i>Dasyurus</i> (quoll) species from increased vehicle movements on the Conservation area.	Further comment has been included in the EIS including updating of requirements for the Construction Environmental Management Plan (CEMP) recommended to mitigate potential impacts from impacted vehicle risks.	section 5.1.4	8
Potential impacts to biodiversity from vegetation clearing - the final EIS should more directly address biodiversity impacts and proposed management response (such as sections on Natural Values and Cumulative Impacts).	The objectives of the NPRM have been responded to directly in the EIS, particularly in relation to biodiversity impacts. The EIS includes management, mitigation and monitoring commitments that have been developed in order to provide management responses to various impacts identified through investigations	section 3.2.4 section 6	6, 7, 8
Potential impacts from proposed lighting choices in building design - the final EIS should outline the advantages and proposals for improved lighting for reducing visual and wildlife impacts.	External lighting choices have kept light shedding to the absolute minimum in order to minimise light pollution, and impact on local wildlife, including recommendations to minimise external lighting in the EIS. Lighting is also required to be in accordance with standards of the planning scheme that are specifically for the Cradle Gateway, in providing safety and security of movement within the site.	Section 5.1.4 Planning Assessment, GHD 1/4/2020, Section 4.10.3, clause F1.6.4	5
Several submissions claim that the proposal promotes mass tourism, not ecotourism - it is recommended that the final EIS should discuss the proposal's design in meeting reserve area management objectives for tourism, including whether	The EIS has been updated to include the objectives of the NPRM. Objective I refers to tourism, however there is no reference within the regulatory framework to mass tourism or ecotourism. The subject site is an existing developed visitor	Section 3.2.4 Section 5.12	1, 3, 6, 9

Key topic	Comments	RAA EIS response	Public submission
<p>the proposal contributes to meeting demand for ecotourism, managing visitor intensity, and providing for habitat protection.</p>	<p>accommodation site that is located centrally within the Cradle Gateway precinct with convenient access to the visitors centre. Intensive site use has been able to occur over time while also maintaining undeveloped parts of the site in excellent condition.</p> <p>The Cradle Gateway Specific Area Plan (SAP) permits visitor accommodation and tourist facilities without reference to visitor numbers. The SAP went through public consultation and was endorsed by Council, PWS and the State Government and supports the area as an appropriate location for tourism.</p>		
<p>Economic viability of the tourism development given COVID-19 impacts to travel - the final EIS should outline the economic viability risks of the COVID-19 issue, whether the scale and staging of the development is affected.</p>	<p>The EIS has been updated with respect to concerns about the viability of the proposed development.</p>	Section 2.1	3, 6, 9
<p>Projected water usage and supply options requires further detail and more accurate data. The stages proposed should be more clearly matched with the water balance changes and water supply options available. It is recognised that the development and planning permit application to the local council would include further TasWater advice on water supply options.</p>	<p>Detailed design has been undertaken to demonstrate the anticipated water usage and supply to the development. The EIS has been updated with this information.</p> <p>The planning permit has been approved by TasWater and Council.</p>	Section 2.4.3	

Key topic	Comments	RAA EIS response	Public submission
Alienation of public land for commercial use.	Approval of public land for commercial use is to be determined by Government through the RAA process. The inclusion of public land within the Cradle Gateway SAP that has been endorsed by PWS, Local and State Government after public consultation and demonstrates support for facilitation of development consistent with the area purpose and use standards, which includes Visitor Accommodation as a permitted use.	N/A	1, 3, 4, 9

Appendices

Appendix A – Representations

Submission 1: Private Individual

Redacted due to obscenities.

Submission 2: Private Individual

I understand this expansion proposal only includes cabins and caravan site, and NO camping sites.

For a natural area such as beautiful natural area such as Cradle Mountain, campers should be making minimal impact on the area. camping site are the type of camping that cause minimal impact, where as caravans and cabins have higher impact causing more damage.

This proposal should at least include a large portion of camping sites and less caravan sites, or even better, no caravan sites,

Submission 3: Private Individual

I moved to Tasmania 12 years ago. I am originally from Germany and for us European people is especially the Tasmanian wilderness so attractive. I always travelled a lot and observed over four decades what happened to beautiful places when mass tourism hit them... due to governments/ state governments or local political decisions in money making. You are on the best way to destroy the unique beautiful wilderness of Cradle Mountain. Gustav Weindorfer would be devastated what are you doing to his park.

I am also concerned that the fauna and flora will be affected by more people staying in the area. While visiting Cradle in January I witnessed more people leaving tracks eg walking on vulnerable cushion plants avoiding people approaching on the tracks for example going from Kitchen hut onto the Face Track or tourists were chasing wombats for a good photo. I was shocked by the big full carpark . The nowadays used big buses traveling into the park were full of people... the drivers didn't tell story's or jokes about Cradle anymore or answered questions as in the "older" days.

Tasmania is one of the most beautiful destinations to travel to due to nearly untouched nature and it seems to be that we on the best way destroying one of the most wonderful places of this island just for the \$\$\$! We bite the hand that feeds us... disappointing !!!

At least if that's not of interest for the money makers put in consideration that may Covid-19 will have a big impact of future traveller numbers as well as Australians shattered relationship to China nowadays!! Depression is on the way for sure and it seems that our politicians are continuing with travel bans for a long time which will destroy a lot of touristic infrastructure as restaurants and cafes. I noticed that David Walsh started to sell art work . Hopefully Mona will survive.

All that could result in that the overseas tourists, who will be able to come to Tasmania in the future, will be the more wealthier and better educated people who expect untouched nature ... which is hard to find nowadays on the world !! Tasmania could still be that destination and attract these tourists if we are focusing more on Ecotourism then mass tourism!

The fact is that people will have less money due to this crisis, flying will be more expensive in the future and less people will come to Tasmania so why extending the existing Discovery park anyway??

In the near future people will travel more locally also due to climate change (I know that the Australian Government is trying to ignore that but the next generations will have to deal with it regardless!!) For most of Tasmanian's Cradle is already too expensive to go to. I believe an extended bigger Discovery Park won't have cheaper prices... I guess it'll bring the prices up!

But I think the decision has been made already and the expansion will go ahead. I hope that magazines like National Geographic will pick up this destruction of Tasmanian nature and publish it to the world.

Hopefully you won't go ahead with the expansion!!

Submission 4: Circular Head Walking Club

Lack of Compliance

1 There is a primary objection in that there is no evidence that the applicant has obtained approval under the National Parks and Reserves Management Act 2002 for the proposed activity and development in the Conservation area.

2 There is a further objection to the proposed Discovery Holiday Park Cradle Mountain Expansion in that it fails to comply with the National Parks and Reserves Management Act 2002 (NPRM).

3 It is also questioned why further encroachment on the Vale of Belvoir Conservation Area is required by the applicant.

Under definitions in the NPRM:

conservation area means –

(a) any land declared under this Act to be reserved land in the class of conservation area; and

(b) any land taken to have been so declared; conservation purpose means –

(a) any purpose specified in Column 3 of Schedule 1 (Nature Conservation Act 2002); or

(b) any purpose that, in the opinion of the Governor, would promote the better management or more effective use of any reserved land;

Schedule 1 Determination of class of reserved land:

Column 1 Conservation area

Column 2 An area of land predominantly in a natural state

Column 3 The conservation of the natural values of the area of land that are unique, important

or have representative value, the conservation of the natural biological diversity or geological diversity of that area of land, or both, and the ecologically sustainable hunting of game species in that area of land.

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.

Public recreation and education consistent with conserving the natural and cultural values of the area of land.

SCHEDULE 1 - Objectives for management of reserved land The following objectives:

Column 1 Class of reserved land	Column 2 Management objectives
Conservation Area	(a) to conserve natural biological diversity; (b) to conserve geological diversity; (c) to preserve the quality of water and protect catchments; (d) 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;
- (f) to provide for exploration activities and utilisation of mineral resources;
- (g) to provide for the taking, on an ecologically sustainable basis, of designated game species for commercial or private purposes, or both;
- (h) to provide for other commercial or industrial uses of coastal areas;
- (i) to encourage education based on the purposes of reservation and the natural or cultural values of the conservation area, or both;
- (j) to encourage research, particularly that which furthers the purposes of reservation;
- (k) to protect the conservation area against, and rehabilitate the conservation area following, adverse impacts such as those of fire, introduced species, diseases and soil erosion on the conservation area's natural and cultural values and on assets within and adjacent to the conservation area;
- (l) to encourage appropriate tourism, recreational use and enjoyment (including private uses) consistent with the conservation of the conservation area's natural and cultural values;
- (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.

Furthermore, The Tasmanian Reserve Management Code of Practice (TRMCP) states in

Appendix 1: Statutory Management

Objectives for Reserves

Conservation Area Management Objectives:

- to conserve natural biological diversity;
- to conserve geological diversity;
- to preserve the quality of water and protect catchments;
- to conserve sites or areas of cultural significance;
- to provide for the controlled use of natural resources including as an adjunct to utilisation of marine resources;

- to provide for exploration activities and utilisation of mineral resources;
- to provide for the taking, on an ecologically sustainable basis, of designated game species for commercial or private purposes, or both;
- to provide for commercial or industrial uses of coastal areas;
- to encourage education based on the purposes of reservation and the natural or cultural values of the conservation area, or both;
- to encourage research, particularly that which furthers the purposes of reservation;
- to protect the conservation area against, and rehabilitate the conservation area following, adverse impacts such as those of fire, introduced species, diseases and soil erosion on the conservation area's natural and cultural values and on assets within and adjacent to the conservation area;
- to encourage appropriate tourism, recreational use and enjoyment (including private uses) consistent with the conservation of the conservation area's natural and cultural values;
- 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.

Objections

1/ Much use is made of the word 'natural' in the NPRM and the TRMCP, however, it is submitted that the proposed development fails to conform and comply with any interpretation of this requirement.

2/ This submission objects to the proposed development in that under Schedule 1, it fails to conserve the land in its natural state.

3/ Furthermore, the proposal is contrary to the purposes specified in Column 3 of Schedule 1 as it does not:

- prioritise protection and maintenance of the conservation of the natural values of the area of land that are unique, important or have representative value, the conservation of the natural biological diversity or geological diversity of that area of land above other activity.
- protection and maintenance of natural and cultural values of the area of the land;

Protection and maintenance of use of the area of land by the Aboriginal people

- provide for ecologically sustainable hunting of game species in the land area,
- involve the sustainable use of the natural resources of that area of land including special species timber harvesting.
- provide public recreation and education consistent with conserving the natural and cultural values of the area of the land.

4/The Vale of Belvoir conservation area encompasses specific and significant natural values. It is axiomatic that these values are in no way extinguished and continue despite the proposed development.

5/It is also noted that the applicant's documentation fails to recognise these values.

6/There being a substantial amount of freehold land in the vicinity that is outside the conservation area, it is therefore questioned why the applicant should want to encroach on this conservation area.

It is submitted that:

- Since no evidence is given that approval has been granted under the *National Parks and Reserve Management Act 2002*, and;
- Unless and until there is compliance with the *National Parks and Reserve Management Act 2002*, and
- There being freehold land in the vicinity that does not encroach on the Vale of Belvoir conservation area and is suitable for the proposed development

The proposed Discovery Holiday Park Cradle Mountain Expansion be refused.

Submission 5: National Parks and Wildlife Advisory Council

Discovery Holiday Park Cradle Mountain Environmental Impact Statement

Despite previously asking to see this development proposal prior to it going out for public comment, NPWAC finds itself with a referral mid-comment period. NPWAC understands that this EIA 'Have your say' consultation process is part of the trial of the RAA new system. Unfortunately, despite the recent assurances of the Director Landscape Programs, the RAA Project Manager and RAA Unit forgot to send it to NPWAC for comment prior to public consultation and as a result, Council's consideration of the proposal has been rushed.

As a general comment, there seems to be inadequate consideration of the natural values of the area in terms of either the impact of an almost doubling of the development on the natural values or as a consequence, the design. The EIS prepared by GHD is inadequate, given the location of the development in the buffer zone of the TWWHA.

The proposed development is a major expansion on the existing operation in a Conservation Area - creating an additional 122 visitor accommodation sites (cabins and site vans), as well as increasing the size of access and internal roading. It is estimated that there will be an increase in vehicle trips from 236/day to 460/day, with increases in the associated risks to wildlife and potential traffic congestion.

Issues noted by NPWAC were:

- **Planning considerations:** It is noted that "the development site is not within the TWWHA and there is no applicable management plan for the reserve. The development will be assessed for compliance with the management objectives for Conservations Areas, listed in National Parks and Reserves Management Act 2002." NPWAC notes that the proposed development would also appear to be governed by the outdated, non-statutory Pencil Pine – Cradle Valley Visitor Services Zone Plan (2006) and that in view of the developments underway and planned for Cradle Mountain, that document is in urgent need of review. It would have been appropriate to have commenced this in 2016 when the revisioning process for tourism development commenced. NPWAC is uncertain about the tenure of the land but assumes that it is within the Vale of Belvoir Conservation Zone.
- **Scale of the development:** The scale is a concern, in terms of density, particularly the indirect consequences of light, noise and traffic movement in the area on fauna – there is minimal mention of mitigation measures or cumulative impact (on the site and more broadly in the area).
- **Water:** Of particular concern is the huge increase in water usage (and therefore waste disposal), associated with the size of the proposed development that is estimated by the proponent. The EIS indicates that the operation will need an extra 39.1kL/day on top of the existing 44.6kL/day provided by PWS (>85% increase). However, a specific source for this extra water is not identified in the EIS, which only mentions possible options, such as rainwater tanks (very large!) and bores (not proven and may affect surface water). More information on the specifics of how the increase in water usage will be met is required. The adequacy of existing Tas Water infrastructure illustrates the need to plan for cumulative impact; what other developments are planned/anticipated, what capacity is there and is it first in best dressed rather than a strategic allocation of capacity. In terms of water use, again there is no discussion of surety, is the PWS/Tas water allocation sustainable in a drying climate, what terms are offered by PWS/Tas Water – guaranteed supply? reviewed how often? priority allocations? The other issue is that if onsite storage is required is this centrally located or individual tanks to each cabin, what does this mean for disturbance to the site and visual amenity?

- Impacts on vegetation: A major concern is the likely impact on the vegetation of the area. All of the vegetation communities, with the exception of the snow gum community, are described as being 'high quality habitat' (but 'not critical habitat') in 'pristine condition'. The EIS indicates that 'up to 2.2 ha' of vegetation will be cleared and that some large (up to 20 metres tall) Eucalypts will need to be removed for safety reasons. However, the 'frequently asked questions' document and the Bushfire Report indicated that up to 4.5 ha will need to be cleared (>25% of the proposed development area). This is a significant loss of vegetation and will cause significant fragmentation of the high-quality vegetation communities in the Conservation Area on the approach to the entrance of Cradle Mountain National Park. It will also reduce screening of the development.
- Fauna impact: As noted in the EIS, the proposed clearing of vegetation will necessarily impact on fauna habitat. Dens are noted in the proposed development area but the survey did not determine which species were using them. The relocation and dispersal comment about fauna is entirely inadequate, especially in light of the potential cumulative impacts of development in that area.
- Traffic and construction impacts: Visitor numbers and traffic movement both during the construction period and after appear "conservative" relative to the size of the development. What other works are scheduled in this period and what is the cumulative impact? I also noted the traffic data used was from 2017. The EIS does acknowledge the importance of biosecurity for machinery to reduce the risk of weeds and disease.
- Lighting: Elsewhere twenty-plus years ago, developments such as Fraser Island had eco-sensitive lighting to minimise impact on fauna/visual amenity, yet here standard bollards and bunker lights effectively create a wall of light around the site (illustrated on the plans submitted). It might be out with the scope of our remit but if this sits within The PWS should be managing their lands requiring best-practice standards/guidelines for development. The need for this was also discussed in NPWAC "dark skies" presentation.

Noting the comments above, NPWAC understands the demand for accommodation in the area adjacent to the TWWHA, particularly lower budget options allowing equity and access for all but questions whether the size of the proposed expansion of this site is warranted in light of the large increase in water required (with no source yet determined) and the proposed destruction of a significant proportion of the vegetation communities and fragmentation of high-quality vegetation in a Conservation Area.

Tasmania should learn from other areas/countries and look to cultivate better design and scale, appropriate to the landscape and values of the site in question. The development of a best-practice building code to guide development on the fringe of our major reserves should be a priority for PWS.

Submission 6: Tasmanian National Parks Association Inc.

The TNPA is opposed to this proposal on the following grounds:

- Several decades ago the PWS put a lot of effort into keeping the approach to Cradle Mountain natural as possible. This proposal will result in intensification of use in an area which is already becoming over-commercialised. Any expansion of accommodation, such as this, should be provided in a nearby town.
- The proposal is a further and unnecessary alienation of public land for private development.

Submission 7: Private Individual

I write to oppose the proposal and 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 Cradle Mountain area once it has re-opened as part of the pandemic 'lock-down' and this information should be communicated to the public via mainstream media communications.

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.

Currently virtually no one, other than staff working for PWS or at non-operating accommodation facilities, can visit to area or have been able to since late March. The earliest current date that the wider Tasmanian community will be able to visit the area is 15 June. (But revised to 3.00 p.m. Friday 5 June while I am writing this, but with serious restrictions on facilities at Cradle Mountain until at least 15 June.)

2) Alienation of public land currently reserved for conservation values.

The environmental impact statement notes that: The Project is proposed on reserved land which falls within the Vale of Belvoir Conservation Area. Public land is public land and once developed can never be the natural area that it once was.

I would like to acknowledge the, then, National Parks and Wildlife Service employees who put so much effort into the planning and development of the current campground when it was developed in the mid-1980s. They sought to provide a bush-like approach to the Cradle Mountain experience. This has long-been lost with over-development of the area.

It is disappointing to see the cooking shelters, and the general 'feel' of the campground decline with limited maintenance and ongoing increase of sites and cabins.

The proposal is about increasing 'mass-tourism' to the Cradle Mountain area and a larger 'suburban-development' much like the Lake St Clair campground has become.

Natural areas owned by the public are a declining asset. Once taken from publicly owned and developed, they can never be 'un-developed' and returned to their once natural state.

3) Limiting the use of this land for recreational walking and other bush activities.

Should this development be allowed, the Conservation Area cannot be used for other purposes which might be more desirable in the future. For example, the current bushwalking areas are generally on rough terrain and in exposed altitudes. This Conservation Area could provide an area for some additional walking track development.

4) Conservation

The area is currently protected as a Conservation Area to protect natural assets. This protection will be compromised by the proposed development.

5) The carrying capacity of the Cradle Mountain–Lake St Clair National Park and adjacent Conservation Areas needs to be determined.

The PWS assumes ongoing and unmitigated growth. The PWS needs to initiate a process to determine a sustainable carrying capacity AND desired visitor experience of people to the Cradle Mountain–Lake St Clair National Park and adjacent conservation areas. I first visited the

Cradle Mountain area in 1978. In the year 2000 the area was nothing like it was 22 years before. Now, 20 years later, there has been ongoing developments that make the area a very different place to what it was in 2000.

Meanwhile, many Tasmanians do not visit the Cradle Mountain area in the summer months as they feel that it has become unpleasant, overcrowded and 'loved to death'. The experience is no longer what many Tasmanian people want, and they are pained by the developments at Cradle Mountain.

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

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

This proposal pre-dates the current pandemic, it needs to be reassessed in terms of covid-19 as 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.

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.

7) The place for a campground is on private land NOT public land.

The proponents should purchase their own land away from the national park and have people travel. This is the case with many other national parks around Australia, there is limited camping/cabins associated with the park, and otherwise people travel for day trips from other areas.

I'm sorry, but to allow ongoing growth and development to fit more and more people in just degrades the experience. When will it stop? Where will it stop? These questions are not flippant. They need serious thought.

Thank you for consideration of these comments

Submission 8: Bob Brown Foundation

Submission to the EIS assessment of the Discovery Holiday Park at Cradle Mountain expansion.

The proposed development sits in the Vale of Belvoir Conservation Area. The purposes of reservation as a Conservation Area as described in the Nature Conservation Act 2002, is stated as:

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.

And:

Public recreation and education consistent with conserving the natural and cultural values of the area of land.

The construction of 122 cabins and caravan sites, with associated roading and infrastructure is inconsistent with the 'The protection and maintenance of the natural and cultural values of the area of land', nor can it be reasonably considered as necessary for 'The protection and maintenance of the natural and cultural values of the area of land'.

The proponent relies on the argument that demand will exceed supply as if it is a necessity to continue expansion of visitor accommodation. It is not. More importantly, it defies the reservation purposes to suggest that the determinant of sustainable use of natural resources should be based on visitor accommodation demand.

Private commercial development should happen on private land, not public reserves.

The proponent's EIS purports 'The existing environment of the site provides good quality habitat for fauna, particularly areas that have not been cleared for the existing Discovery Park', and further regards the habitat as of high quality. Loss of this habitat is unacceptable.

The proponent also asserts that the project will facilitate an additional 224 vehicle movements per day. This figure is likely conservative and appears to be a simple doubling of the number of the number of cabins and sites. It does not consider additional movements by patrons between other facilities within the area during their stay.

The proponent also acknowledges the presence of *Dasyurus maculatus* subsp. *maculatus* (spotted-tail quoll), *Dasyurus viverrinus* (eastern quoll), and *Sarcophilus harrisi* (Tasmanian devil, however downplays the impact of the project on these species. Additional vehicle movements, particularly between dusk and dawn will increase likely mortality for these species.

This project should not be approved.

Submission 9: Private Individual

My name is (redacted) and I thank you for the opportunity to make a submission though any actual face to face public consultation appears to have been missing and there has been no extension given to enable this though we have a deadly COVID-19 to contend with. I would like to highlight that the EIS was released April 2020 during lock-down due to the delay virus and therefore there has been a complete the lack of meaningful community consultation. There should have been an extension given to cater for the COVID-19 virus and the ensuing isolation the resulted from this. This lack of ensuring that public consultation was rigorous and seeming rush to push this through during the deadly virus does not sit well with my sense of fairness and transparent participation when proposing such a large expansion in the Vale of Belvoir Conservation Area by a private company.

As noted in today's Tasmanian Mercury article regarding the Capes huts and the abysmally insignificant cost of the 'exclusive 30-year license to operate luxury private accomodation lodges on the Three Capes Lodge Walk' in the public's own National Park with 'lease rights to luxury huts costing the operator a mere \$50,000 a year is plainly ridiculous and unacceptable. The cost to develop the '46km track on the Tasman Peninsula, developed by the state and local governments at a cost of \$40 million', with the private company (on public lands, and in a National Park!) charging walkers a whopping \$2,895 for each four-day trek goes against what a National Park must be protected for. the leasing of 'Halls Island in the Tasmanian Wilderness World Heritage Area for a minimal \$6,000 a year' is also promoting incursion into areas that are to be protected under International agreements for ecological values that are already threatened by the encouragement 'shrouded in secrecy' on so-called 'commercial in-confidence' grounds is simply ridiculous and unacceptable. These land are set aside for particular purposes and it is not for private developers to eye off and profit from at the expense of the public who own these lands.

To allow monopoly by private developers on public lands without competitive processes for a bargain price is unacceptable and must be nipped in the bud. National Parks and Conservation Areas and Reserves are set aside for more that simply tourists and private developers to profit from. Private development must be curtailed to private property and not encouraged in areas that have such high environmental values. Developments, even like the expansion proposed by the private Discovery Holiday Parks company is to be disallowed on public lands that have been set aside for nature, not tourism developments for humans to intrude onto public lands.

The Vale of Belvoir Conservation Area

The Vale of Belvoir Conservation Area and surrounding Reserves and National Park is one of the most important places for nature conservation in Australia. It is home to the world's density population of carnivorous marsupials, including the vulnerable spotted-quote and the endangered Tasmanian devil as well as home to shy ground parrots endangered ptunrra brown butterflies and numerous wildflowers. It is vital to maintain the values associated with the diversity and condition of the surrounding biodiversity. In the neighbourhood is also the 500 ha is part of Australia's National Reserve System

securing the protection of native habitat. property managed by the Tasmanian Land Conservancy protecting it for future generations.

The proposed private expansion intends to create an additional 122 new sites with 71 cabins and 51 new caravan sites as well as supporting infrastructure for sewer, water and stormwater requirements as well as bushfire hazard reduction management is proposed to be developed on public land within the Vale of Belvoir Conservation Area sitting just outside the Tasmanian Wilderness World Heritage Area. Between 2.2 to 4.5 ha of the 14.2 ha is to be leased with the avoidable removal of larger trees due to hazards they supposedly pose. the site also has burrows, habitat for wombats devils and quoll dens. Concern is also that since the Federal

government has stopped listing major threatened species under national environmental laws, and listing are out of date or haven't been done at all. Key threatening processes such as clearing and private development in these areas of high value conservation and abutting corridors and buffers a necessary for the survival of native wildlife but this has been halted. Wildlife protection is made optional for governments and this is simply not good enough, as acting irresponsibly, by encouraging private development in areas that have known conservation values is what is happening, especially in Tasmania. The EPBC Act failures must be addressed and this includes the failure of listing of threatened species and habitats both critical and not, enabling the recovery actions for species and not adopting or implementing them such as: feral cats, land clearing and climate change which are key threatening processes pushing native plants and animals towards extinction. Australia leads the world in species extinction and any expansion of private development must not proceed without rigorous community involvement especially during the delay COVID-19! Like this expansion.

My points to take note of:

- before any commencement of works on the Project site all building and plumbing permits must be attained;
- profitability of the private company is not a consideration as it is on public lands that have a fairly high degree of conservation value;
- low budget accomodation is also not of consideration as this is a private developer/ company and they do state that there will be four new architecturally designed luxury accomodation as well as 51 additional campsites, 11 new cabins, 12 additional carparks, 21 new cabins, upgrades to access roads such as widening and resurfacing, and another 35 cabins as well as a new storage/service shed and upgrades to access roads so it is about profits;
- this proposed complex of 230 accomodation sites also has infrastructure requirements such as road widening, sewerage, water and storm water treatment as well as wastewater disposal, sourcing water from rainwater tanks, altering existing drainage which already causes scouring and erosion;
- again the idea that it is vital to provide "low budget accomodation options" is a questionable consideration as this area will be impacted by the increased movement of cars, caravans, delivery vehicles, fire reduction trucks, ambulances etc etc;
- it is simply not good enough to state that the environmental values identified on the site to be developed will simply be "minimised wherever possible". Impacts must be avoided;
- the Tasmanian Wilderness World Heritage Area boundary is a mere 300m away
- also in close proximity (100m) to Tyennan Region and Western Tasmanian Blanket Bogs geoconservation sites;
- it might not be critical habitat but it is quality habitat that is to be bulldozed;
- there would be impacts of the required significant upgrades to electrical and service infrastructure with power above ground instead of demanding that power be below ground negating the bushfire risk;
- the restriction of speed limits to 60km/h has to be 40km/hr due to increasing vehicle trips up to 460 per day, increase of 224 from the current rate of 236 trips per day and this will result in the loss of more endangered species;
- the increase of large vehicles during construction ad at other times for resupply also increases the risk of more species deaths;

- management of speed restrictions for potential fauna and dust impacts is questionable at best due to an already highlighted water scarcity as well as we have all seen logging trucks and how the speed when no one is watching/monitoring;
- the increase in the demand for water is a serious concern and there is a lack of information regarding additional capacity as well as concern about additional accessing of bores in the area and what the impacts of groundwater extractions would be is simply not addressed;
- there is already erosion and scouring on the site in the shallow spoon drains and simply no flowing information has been provided and this is of concern as increased discharges will have an impact;
- fire-fighting water storage is of concern;
- the sewage pump station and what happens to any sewerage hasn't been properly explained;
- though visitor accommodation is permitted, this is intensification of that use and there has to be a limit because of traffic increases, and more people, cars, caravans and litter, sewerage, water, road widening impacts, increases in hazard burning etc;
- climate change has not been addressed, as areas will alter in composition due to increased dryness or wetness and intensity of these and habitat conservation is/will become important for the survival of species;
- there doesn't appear to be introduced species but these will come with the widening of roads, garbage, and litter and people;
- what about biosecurity, since no introduced species have been recorded;
- the alpine violet, though it is not listed under the EPBC Act, one has to remember that the EPBC Act listings have been lax and any permit to take threatened flora is surely simply not acceptable as it must be avoided leaving the plants species in-situ;
- since there is good habitat for fauna in uncleared areas, with fallen logs and other, why bulldoze, just because it is stated there is more in the surrounding areas and Cradle Mountain National Park, one would think that corridors and connections are vital for safe movement of species;
- transits to adjoining forest and foraging is important and though there is no noted nesting or denning this doesn't mean that there isn't or won't be because of climate change and habitat clearing, the opportunity is taken away by allowing clearing and logging and removal of large trees;
- any level of clearance has an impact and this is avoidable if clearing is avoided, NOT just minimised!
- why hasn't ground proofing been done for burrows and flora and other fauna, rather than just leave it when construction commences when it is too late to avoid;

I have run out of time but my assertion is that there has been no face to face consultation since the release of the April 2020 document because of COVID-19 and that simply is not good enough and therefore the whole process must be halted until there is transparent and rigorous consultation carried out so the community has a say and can ask questions that are vital to any project that cleared this amount of land. Clearing is one of the most devastating actions, as well as ensuring climate change is being taken into any decision-making. This is yet another private developer expanding into areas that have natural values to be protected because this yet another incursion into areas not just for accommodation, but everything that goes hand-in-hand with increased human impacts and actions!

Thank you, and I would like to iterate that we need proper consultation not just a computer print out!!!! These areas are unique natural places, rare ecosystems as become rarer as more and more areas are cleared for human expansion, threatening habitat, plants and wildlife which must be protected. Expansion for private developers to profit, at the cost of loss of habitat and species, is simply not acceptable any longer. We have done enough damage to our natural environment. We value our natural environment for itself, not for what it provides private developers and humans. Nature has an intrinsic value, besides the value that humans place on it. Look at nature rebounds without humans everywhere during COVID-19!! Says it all. I believe in a light footprint, NOT a heavy bulldozed expansion of fairly large large size. Leave it alone for goodness sake.

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