

The Secretary,
Public Works Committee,
Parliament House,
Hobart,
TAS 7000



21 September 2012

To the Committee,

Re: Three Capes Track

Further to the Public Notice in the Mercury (30 August 2012) calling for public comment in relation to the Three Capes Track which is proposed to be built within the Tasman National Park please accept this representation by the Tasmanian National Parks Association (TNPA).

Launched in September 2001, the TNPA is a non-profit, non-government organization which gives the public a voice on issues that affect Tasmania's National Parks and other conservation reserves. Like similar associations in other Australian States, the TNPA provides a link between the community, park policy makers and other government and non-government organisations to identify and address issues concerning the ongoing management of Tasmania's reserve system and other areas of high conservation status. Further information about the TNPA can be found at www.tnpa.asn.au.

The TNPA welcomes the opportunity to comment on the Three Capes Track as we have had a number of ongoing concerns about this proposed development since it was initially proposed (2007 Feasibility Study), and we continue to be concerned about the proposal on a number of levels, including the economics used to underlies the proposal..

In particular, we believe that the concept which underlies the Three Capes Track model is fundamentally flawed. This is because it attempts to impose an "Overland Track" (multi-day wilderness walk) model on a "track" created by linking several existing day-walks and the (short, easy) overnight walk to Cape Pillar in an essentially non-wilderness area. Any long distance walking track on the Tasman Peninsula will inevitably be accessible by road at several points – i.e. most sections of the "track" can be walked as day-walks, and most walkers will probably prefer to do this. As such it is hard to understand why they will want to be "trapped" into staying in "Overland Track style" cabins when they could be in a hotel or bed & breakfast elsewhere on the Tasman Peninsula (or alternatively want a more natural tent-based experience).

This is the fundamentally different model adopted by the highly successful Great Ocean Walk in Victoria where visitors can walk the entire track while camping each night or taking the option of staying in local accommodation and walking only the sections of track that appeal to them. The TNPA has long advocated investigating a similar concept for the Tasman Peninsula as we believe it is likely to attract far more visitors than the current proposal and provide a greater return to the local economy (walkers will stay in the local community, not be isolated from it) with far lower capital expenditure and environmental impact (see Attachments 1 and

2). Indeed, the TNPA believes that a unique advantage of the Tasman Peninsula is that there is a community living in juxtaposition with the Tasman National Park and ideally a mutually beneficial relationship between tourism operators should be nurtured rather than a competitive one

The TNPA believes that this fundamental flaw will result in the Three Capes Track (if it is ever constructed) becoming an expensive “white elephant”. While there has been opportunity for public comment on aspects of the proposal the underlying concept has remained unchallenged because it has never been explicitly subject to public review or scrutiny.

Further concerns are summarised below, and are detailed in Attachments 3 and 5 (key earlier submission and letters).

Environmental Considerations

- The proposal has potential impacts on the flora, including through phytophthora spread, on nesting eagles, visual impacts and impacts on the landscape values of the World Heritage Port Arthur Historic Site (no formal assessment), all of which are extremely difficult to mitigate;
- The scale of infrastructure (especially the accommodation sites) is extremely large scale, and unnecessarily large with huts designs creating significant visual impacts;
- The proposal, by virtue of its location has acknowledged impacts on Aboriginal heritage values (assessment incomplete), geo-heritage values and wilderness values;
- There are potential unassessed threats to the natural values because the proposed track cordons the coast and hinterland. Furthermore, the Draft Development Proposal and Environmental Management Plan (DPEMP) that accompanied the proposal was seriously incomplete in a number of aspects;
- The TNPA argues strongly that you cannot place the level of infrastructure such as being proposed within a National Park without degrading, or putting significantly at risk, the conservation values that the park was set aside to protect.

Economic Considerations

- The design of the track and accommodation is extremely expensive, and in our view unnecessarily so (and the Parks and Wildlife Service (PWS) has had to continually revise its cost estimates upwards);
- The proposal is extremely expensive to construct (as witnessed by the cost over-runs on the recent Cape Hauy upgrade) and will be expensive to run and maintain given the total dependence on helicopters;
- The projected economic benefits of the Three Capes Track in its current form are, at best, optimistic and at worst, substantially incorrect and grossly overstated as i). an uncorrected Overland track spending model has been used, and ii). it relies on what we believe are unrealistic take up figures for the Track (further details provided later);
- The six day walk as proposed will generate little direct income to the Tasman Peninsula, as accommodating tourists inside the national park (up to 50 000 bed nights per annum) will directly compete with tourism initiatives in the Tasman community and most of the claimed income will be indirect spending – most likely elsewhere in the State (with the same spending being an outcome of any longer stay tourist attraction);
- The proposal is flawed in assuming that most walkers want hut-based accommodation as against camping in tents. Based on the survey of walkers attitudes provided in the

Feasibility Study¹ only 19% of the 537 people surveyed wanted huts. Furthermore, current (and earlier) evidence suggests a six-day / five night walk is not the preferred walk option by the market segment that the Track is trying to attract (the majority of commercial walkers surveyed for the Feasibility Study stated a preference for a 3-4 day walk), further reducing the potential success of the Track;

- The use of boats (with associated costs) is cumbersome and will deter many walkers from completing the entire Three Capes Track (preferring to do shorter sections);
- There is to our knowledge no proper Business Plan for the Project;
- The concept of providing an alternative or additional walk to the Overland Track experience is flawed. The Overland Track is a “wilderness” walk which is highly marketable and as such provides an experience that many walkers seek. The Tasman Peninsula, despite its spectacular coastal scenery, is not “wilderness” and as such will be not be able to match the wilderness experiences offered by either the Overland Track or the multitude of other multiple-day “wilderness” walks within Tasmania (such as the South Coast Track, Frenchmans Cap, Mt Anne, etc);
- There has not been to our knowledge any re-assessment of the economic feasibility or costings based on the announcement in the last month that only the eastern half of the Track will be built and used initially.

Social Considerations

- The benefits to the Tasman Peninsula in our view have been significantly overstated;
- This walk experience imposes on existing current use, including significant day and local use;
- There has been considerable community opposition to the Three Capes Track proposal. For example, of the 248 representations received on the draft changes to the Tasman National Park Management Plan, the vast majority (210) were opposed to the Three Capes Track. Of the 38 respondents who did not declare opposition to the Three Capes Track, only eight respondents gave unqualified support for the proposal.

Process Considerations

- There are in our view serious probity issues given the minimal process that has occurred, and given the fact that the PWS is the proponent, approver, and regulator for this large scale development;
- The Three Capes Track proposal is not in keeping with the government’s own recommended approach as set out in the 2006 Planning for People scoping study² – which suggested that a multi-day walk on the Tasman Peninsula should integrate with existing opportunities, be a 3-5 day walk (which could be extended by linked segments), use the Pirates Bay – Fortescue Bay section of existing track, and have tent sites inside the Park and built accommodation outside the Park;
- The Tasman National Park Management Plan had to be significantly changed to allow for the Three Capes Track (in spite of significant opposition to this);
- There has been only one formal opportunity for public comment on the proposed Three Capes Track development since the Feasibility Study was released in 2007, and this

¹ Three Capes Track; Feasibility Study, Department of Tourism, Arts and the Environment, 2007

² Great Bushwalk Scoping Study: Key Attributes and Supply Analysis, Planning for People, March 2006

input (comment on the Draft DPEMP, Nov-Dec 2011) has been totally ignored by the PWS;

- The PWS have approved the project on the basis of the November 2011 Draft DPEMP, not a revised final DPEMP, and local government approval was received on the same basis;
- There are still unresolved and incomplete environmental impact assessments and mitigation (eagles nests, Aboriginal heritage, impacts to the Port Arthur Heritage Site);
- No alternative proposals (including a proposal put forward by the TNPA) have been considered.

Given that the Role of the Public Works Committee is primarily to review the financial viability of the project as a government funded project, the following discussion focuses on the economic issues.

The Three Capes Track – Flaws in the Economic Case

The economic case put for the track by its proponents is based on projections of 10,000 walkers using the track annually, yet there has been no analysis to indicate that level of participation. The assumption that the proposed Three Capes Track will be equally, or more, popular than the Overland Track remains unsubstantiated. Just 7050 people paid to walk the Overland Track during the period November 2006 to April 2007 (the latest figures available), even though up to 10,000 are permitted. This is despite the Overland Track being in existence for over sixty years and being heavily marketed as a world-class wilderness walk for many years. This calls into question the claim that the Three Capes Track will attract 10,000 walkers paying a \$200 fee (a higher fee than the overland Track) during the same time period.

KMPG Analysis

A further insight into the nature of the unsubstantiated economic claims for the track can also be seen in the KMPG report³ commissioned by the Tourism Industry Council of Tasmania (TICT). The figures in this report have been widely reported in the media, and have mainly quoted from a number of media releases put out by the Tourism Council. In their release, dated 23 May 2010, TICT Chief Executive Daniel Hanna is quoted as follows: *“The research recently conducted on our behalf by KPMG highlighted that the Three Capes Track would deliver between \$90 million to \$190 million in additional visitor expenditure each year to Tasmania; with a substantial proportion of this on the Tasman Peninsula.*

However, the Tourism Council has made two fundamental mistakes in reading its own commissioned report, and in so doing has widely misrepresented the alleged benefits of building the proposed Three Cape Track.

First, the economic benefits stated in the report are for the whole seven year period to 2017, not annual benefits. This is clearly stated in the report on page 7 of the report *“...the modelling is projecting whole period impacts that may need apportionment over time.”*

Second, the report uses two indicators of economic impact - Gross Output and Value Added. The Tourism Council quotes the Gross Output figures. However, the report itself notes on page 12 that *“within this gross value is included the value of raw materials that, in most cases, have*

³ Three Capes Track: Economic Impact of Additional Day Walk Visitors, KMPG, February 2010

already been counted as part of gross output from earlier production. Therefore there is a tendency for Gross output figures to include some double dipping". The report goes on to state that the Value Added figure (as used by the Australian Bureau of Statistics) *"is the measure usually preferred when measuring economic impact"*. Using the Value Added figures, the KMPG report estimates that the additional economic benefits (in millions of dollars) of the Three Capes Track are as follows:

| Benefit Period | Conservative | | Optimistic | |
|----------------|--------------|--------|------------|---------|
| | Until 2017 | Annual | Until 2017 | Annual |
| Tasmania | \$44.07 | \$6.30 | \$92.73 | \$13.25 |
| Tasman Region | \$9.93 | \$1.42 | \$15.86 | \$2.27 |

The alleged annual benefits to the Tasman region are therefore seen to fall to between \$1.4 - \$2.27 million while the alleged benefits to Tasmania as a whole are between \$6.3 - \$13.25 million, not the \$90-190 million quoted by the Tourism Council and in other media releases. The claim by the TICT is also seen to be false (and clearly absurd) when considered against the economic benefits of the entire Tasmanian Wilderness World Heritage Area which have been estimated to be \$190 million per year (see Media Release-by Hon Peter Garrett - A World of Value in Heritage –dated 7 May 2009).

Together with these misrepresentations there is also a major flaw in the economic analysis itself. The report assumes that, due to people being attracted to the region to undertake short walks (e.g. day walks) on the Three Capes Track, there will be an additional annual increase in visitor numbers to the Tasman region of between 3-5 percent above the normal growth of recent years. However, this assumption is not substantiated anywhere in the report (where else has this occurred?) and also ignores the fact that the Tasman Peninsula already hosts over 30 day walks and several multiple day walks including the 4 day Tasman Trail. As such, people undertaking short walks are already included in the existing visitor numbers to the region and the analysis double counts these visitors when it assumes that such walkers will also make up the 3-5 percent increase in visitor numbers.

Overland Track Experience

Finally, if the economic premise for the Three Capes Track proposal is to duplicate the economic benefits which have apparently flowed from the marketing of the Overland Track Experience, it is constructive to compare the predictions for the Tasman Peninsula with the actual changes in visitor numbers to the Cradle Mountain region in recent years. The KMPG report predicts that visitor numbers to the Tasman Peninsula will increase by between 3-5% per annum above a no Three Capes Track scenario, with a total increase in visitor numbers of between 9-16% over the first three years the track is operational. However, data published by the Parks and Wildlife Service indicates that compared to 2004-05 visitor numbers to the Cradle Mountain region actually decreased by around 7% the following year when fees were first charged for the Overland Track, and by 2007-08 visitor numbers were still down by 4%.

Given the overly optimistic projections used in the KPMG report it follows that the projected economic benefits (of \$1.4 - \$2.27 million per annum to the Tasman Peninsula) are also overly optimistic. Based on this analysis the TNPA believes that the annual returns to the economy of the Tasman Peninsula will be less than \$1 million (if not considerably less) and as such would

represent a very poor return on the large use of public funds (currently costed at \$25 million), particularly given the present needs for additional funding in other sectors of the Tasman community (e.g. schools and hospitals).

Additional Issues

There are other unresolved aspects of the proposed development with implications to the final cost of the project, such as:

1. The proposal to initially only complete the western half of the walk with no discussion for example of how walkers will start the walk or how it will be staffed or costed and where the entry infrastructure will be located;
2. Walker safety and the need for safety balustrades and/or railing along the walk at various locations;
3. Whether it is possible or desirable to construct the track across a “steep and unstable section of cliffs” in the Fish Hawk Gully area if land owner agreement to use private property is not forthcoming; and,
4. As indicated by the huge cost overruns incurred on the recent upgrading of the Wineglass Bay Lookout track, the TNPA believes that the costs of constructing the Three Capes Track has also been significantly underestimated and that the large costs associated with this development would be an unacceptably extravagant use of public funds when the PWS requires additional funds to effectively maintain the existing values throughout the Tasmanian reserve system.

Given the level of public investment proposed for the Three Capes Track we believe that it is essential that the alleged economic benefits of the project are rigorously assessed by an independent body (see Attachments 4 and 5).

Conclusion

It is the TNPA’s strong view that given the deficiencies of the current development, it would be environmentally and economically irresponsible of the Tasman Government to approve the currently highly deficient and flawed Three Capes Track proposal, particularly given the large amount of public funds involved and given the impacts it will have on a National Park. A further concern is the lack of consideration of any other models for a multi-day bush walking opportunity on the Tasman Peninsula.

Given the seriously flawed nature of the project in its current form, the TNPA strongly urges the Committee to reject the present proposal and:

- 1. Recommend to the Premier that an independent assessment of the project, including potential alternatives be undertaken (as proposed by the TNPA – see Attachment 2);and/or**
- 2. Recommend that the government initiate a series of consultations with community stakeholder groups in order to develop a proposal that will both offer greater protection to the conservation values of the Tasman National Park and provide greater economic benefits to the Tasman community. In this regard we believe that the TNPA’s alternative proposal, the Great Tasman Coastal Experience, provides a guide for achieving this balance (see Attachment 3).**

It is of great concern to the TNPA that the present proposal has been so poorly handled and had so little proper scrutiny. It is incumbent on any responsible government to take environmental, economic and social considerations (the so-called triple bottom line) into account when

assessing the appropriateness and/or suitability of any development, particularly those which are publically funded and located on public land.

The TNPA is happy to meet with the Committee to discuss in more detail the issues raised in this submission, or to answer any questions the Committee might have.

Yours sincerely,



Dr. Robert Campbell

**President
Tasmanian National Parks Association**

Attachments:

1. Great Tasman Coastal Experience Report, TNPA, 2011;
 2. Mercury Soapbox Article: Take a Walk on Tassie's wild side - 30 June 2012;
 3. Submission by the Tasmanian National Parks Association in relation to the: DRAFT DEVELOPMENT PROPOSAL AND ENVIRONMENTAL MANAGEMENT PLAN: THREE CAPES TRACK PROPOSAL, TASMAN NATIONAL PARK – 23 December 2011;
 4. Letter to Hon Lara Giddings MP, Premier of Tasmania, re: request to make the Thee Capes Track a Project of State Significance – 14 February 2012;
 5. Letter to Hon Lara Giddings MP, Premier of Tasmania, re: Additional information in relation to making the Thee Capes Track a Project of State Significance - 14 August 2012.
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ATTACHMENT 1

GREAT TASMAN COASTAL EXPERIENCE REPORT: TNPA, 2011

GREAT TASMAN COASTAL EXPERIENCE



Looking towards Cape Hauy, with the iconic 'Totem Pole', 'Candlestick' and 'Lanterns' at its edge. Photo: Ted Mead

Tasman National Park: getting it back on track

The Tasmanian National Parks Association (TNPA) believes there is an alternative to the Government's present Three Capes Track proposal which is more appropriate for the management of the Tasman National Park and will provide greater support and economic benefits to tourism operators and the community.

This alternative, which we call the Great Tasman Coastal Experience, is based on a tourism strategy which integrates the existing network of day and overnight walks on the Tasman Peninsula with a range of other tourism and hospitality related services available in the region.

Central to this experience will be the four-day Tasman Coastal Trail taking in the spectacular coastal scenery on the eastern Tasman Peninsula including both Cape Hauy and Cape Pillar.

This is the model behind the Great Ocean Walk in Victoria which is presently attracting around 45,000 visitors per annum.

To construct and market a new walking track where economic benefits will largely flow to a few commercial operators, when an alternate Great Tasman Coastal Trail already exists, does not make sense.

Upgrading the existing network of trails, as suggested in the TNPA's Great Tasman Coastal Experience proposal, and undertaking an integrated marketing campaign with other attractions and



Inland the Tasman National Park includes wet and dry eucalypt forest. Photo: Ted Mead

experiences in the region, will bring greater and more widespread benefits to the entire Tasmanian community.

The advantages of this proposal are outlined in detail in the next section "On the Right Track" but in summary are:

1. Consistent with Tasman Peninsula Tourism Strategy which promotes year round tourism, incorporating a range of activities.
2. Maintains the conservation values of the Tasman National Park.
3. Allows greater freedom for visitors to undertake a range of overnight and day walks.
4. Includes the spectacular section of track between Pirates Bay and Fortescue Bay which is left out of the proposed Three Capes Track.
5. Would provide overnight camping at Fortescue Bay and improved use of beaches in the region.
6. Allow easier integration with available accommodation and other tourist related options in the area.
7. Avoid the cumbersome and costly (and possibly dangerous) boat trip across the Port Arthur Inlet.
8. Allow a greater opportunity to integrate other tourist related activities in the region such as sea kayaking and other marine options.

PRODUCED BY THE TASMANIAN NATIONAL PARKS ASSOCIATION

GREAT TASMAN COASTAL EXPERIENCE

On the right track

The Great Tasman Coastal Experience proposal builds on a number of distinct advantages the Tasman Peninsula has as a tourism destination. These include:

- One of Australia's greatest cultural icons – the Port Arthur Historic Site – attracting around 250,000 visitors in 2006/07.
- Some of Australia's most magnificent coastal scenery which is already accessible through more than 30 day-walks and several multi-day walks, including the Tasman Coastal Trail (one of the five Great Bushwalks marketed on the Tasmanian Parks and Wildlife Service website).
- A diverse range of other tourist opportunities provided through a host of existing tourism operators, including outdoor land and sea adventures and other hospitality experiences.

While there are already a large number of visitors to Port Arthur, the question that needs to be asked is why these visitors are not extending their stay and making use of other experiences presently on offer in the region? And will building another walking track change this when a diverse range of walking experiences already exist?

The TNPA believes that what is presently missing is not another track, but an integrated tourism strategy for the Tasman Peninsula, based on upgrading existing day and multi-day walks and combining them with cultural (eg Port Arthur, Eaglehawk Neck and Lime Bay State Reserve), outdoor adventures (cruises, kayaking, fishing) and other hospitality experiences offered by the region, with guests utilising existing hotels and bed-and-breakfasts.



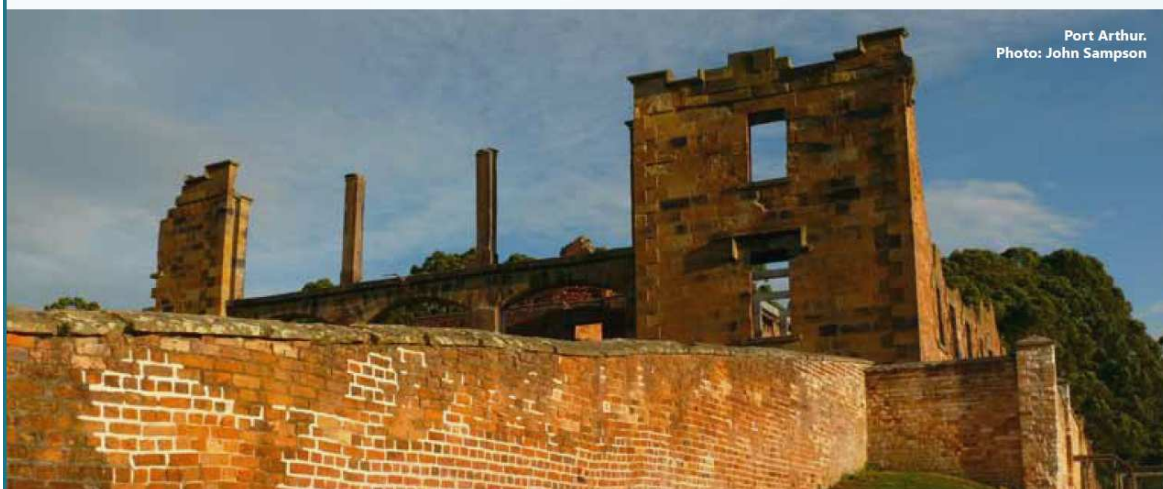
As mentioned above, the TNPA believes the concept behind the Great Ocean Walk in Victoria offers such a tourism model but seems to have been ignored by supporters of the Three Cape Track.

The Great Ocean Walk model is based on a partnership between existing tourism operators, and offers freedom of choice for tourists in options such as guided versus self-guided walks, number of days, type of accommodation, and price. There are currently around 20 official partners offering a range of walker services while 22 official partners offer accommodation. Only camping facilities are offered on the track, and off-track accommodation

includes a range of options such as caravan parks, self-contained units, bed-and-breakfasts, and lodge accommodation – most within five to ten kilometres of the walk.

The 'walk it your way', with step-on/step off, camping, and accommodation options, provides significant interaction between tourism operators on service provision (accommodation and transport to or from the trail heads each day) which adds to client convenience by not having to separately organise components of the experience.

A wide range of extra hospitality services such as gourmet meals, massages



Port Arthur.
Photo: John Sampson



Fortescue Bay is a favourite beachside spot for picnickers, bushwalkers, campers and recreational fishers.

Photo: Ted Mead

and interpretative wildlife and cultural tours are also offered by partners, and provides a key source of product diversification and innovation to the market. These components, along with the freedom of choice mentioned earlier, are instrumental in personalising the experience for many visitors.

While each partner has an individual website, there is also a separate coordinating Great Ocean Walk website. We recommend you visit www.greatoceanwalk.com.au to find out more.

The Great Ocean Walk model is about partnerships and suits situations such as that found on the Tasman Peninsula, where there exists a diverse range of visitor options, accommodation infrastructure and reasonable road access for transport and drop-off. This is the type of tourism product that experience overseas and elsewhere in Australia shows people greatly prefer.

Having people spend all their time on a single walk and stay in privately owned huts within the park, as is presently proposed, offers a limited product and will not spread the economic benefits around as is desired.

Ideally a mutually beneficial relationship between tourism operators should be nurtured rather than a competitive one.

The TNPA believes all the components necessary to build a Great Tasman Coastal Experience already exist on the Tasman Peninsula.

While details would ideally be based on consultation between all interested stakeholders, such a walk could centre on the existing four-day Tasman Coastal Trail starting from Pirates Bay and proceeding south along the cliff tops to Fortescue Bay, taking in Cape Hauy and Cape Pillar before returning via Snake Hill to Fortescue Bay (or in reverse).

As the Tasman Coastal Trail already exists it would be less costly to upgrade and avoid some of the cumbersome and expensive options of the present

Government proposal. It would also preserve existing pristine parts of the Tasman National Park. Furthermore, it would take better advantage of a number of attributes found on the Tasman Peninsula, including:

- The magnificent section of track between Fortescue Bay and Pirates Bay (climbing over Tatnell's Hill) which has been left out of the present Three Capes Track proposal.
- Allow sections of the track to finish near towns (Eaglehawk Neck) or near road heads (Fortescue Bay) so walkers can make use of services offered by existing accommodation and tourism providers in the region.
- Allow sections of the track to finish near beaches (Fortescue Bay and Eaglehawk Neck) so walkers can enjoy the benefits of beachside camping.
- Support the outcomes of the walker survey undertaken by the Scoping Study which indicate most commercial walkers want a three-four day walk – ie many popular walks such as the Milford Track in New Zealand are four-day walks.
- Allow visitors more time to enjoy and make use of a range of other walks and tourist experiences offered in the region (day walks, sea-kayaking, visiting Port Arthur and other regions of historical and geological interest).

This walk could also be complemented by upgrading some of the 30 existing day-walks in the region, thus allowing a range of walker experiences from day-walks, to overnight and multi-night walks. Such a diversity of walk options integrated with the range of other experiences on offer across the region would attract a greater number and diversity of visitors.

Properly marketed, the TNPA believes a walk such as the Great Tasman Coastal Experience, combined with a range of other walk experiences, would increase the demand for tourist based services, including overnight accommodation and meals, and bring greater economic

benefit across a range of existing tourism operators in the region. This is in contrast to the Government proposal which is targeted at a more limited range of visitors (those wanting to do a five-six day walk) and will limit benefits to a few.

The TNPA believes a holistic marketing strategy is missing, integrating the range of walking and sea-based experiences in the region with existing hospitality opportunities, and as such, enticing visitors to extend their stay beyond a visit to Port Arthur.

It is of deep concern that the government has committed so much time and money to this proposal, and a de facto decision has already been made, even though the anticipated benefits from this proposal cannot be guaranteed and the public has had little opportunity to comment. It is also likely that local support for the present Three Capes Track concept is being influenced, not by an informed debate about the design of the project and its inherent benefits or flaws, but to a large extent simply because an "enormous amount of money" has been allocated to this project (though much of this money will not be spent in the region).

To construct and market a new walking track where the economic benefits will largely flow to only a few commercial operators, when an alternative Great Tasman Coastal Experience already exists, does not make sense.

Upgrading the existing walk as suggested by the TNPA, and undertaking an integrated marketing campaign with other attractions and experiences in the region, will bring greater and more widespread benefits to the entire Tasmanian community. A unique advantage of the Tasman Peninsula is a community living in juxtaposition with the Tasman National Park and ideally a mutually beneficial relationship between tourism operators should be nurtured rather than a competitive one.

GREAT TASMAN COASTAL EXPERIENCE

On the wrong track

The Three Capes Track, as presently proposed, is envisaged to be a six-day/five-night walk that will follow the southern coast of the Tasman Peninsula for a total of 68 kilometres.

The track is to begin at White Beach, near Nubeena, and finish at Fortescue Bay, visiting Cape Raoul, Cape Pillar and Cape Hauy.

A five-day/four-night guided walk with a private tour operator will also be offered beginning near the start of the Cape Raoul track.

The track will include a boat trip across the Port Arthur Inlet between Safety Cove and Denmans Cove in order to bypass the town of Carnarvon, the Port Arthur historic site and avoid other parts of the coastal strip outside the Tasman Park.

It is anticipated that when fully operational, 10,000 people per year will walk the Three Capes Track (with up to 60 departures a day).

Walkers undertaking the Three Capes Track will pay a fee for use of the huts, in addition to park entry fees. The feasibility study proposed a fee of \$200 (\$40 per night).

The present Three Capes Track proposal will involve the construction of the following infrastructure:

- Construction of about 30 km of new walking track, major upgrading of about 25 km of existing track and minor upgrading of about 13 km of existing track.
- New viewing/resting areas, interpretation, entry/exit signs and track signs.
- Five overnight hut-based accommodation nodes, incorporating both a public hut with basic facilities, a commercial hut for guided trips with higher level facilities, and track ranger accommodation.
- Gateway facilities including walker registration, signage, shelter and other services are likely to be located at White Beach and Pirates Bay.

The total investment required to complete the track has been estimated to be approximately \$33 million. The Tasmanian Government has committed \$12.8 million to the project, the Australian Government has committed \$12.5 million, while a further \$8 million is to be provided by the private sector, though these private operators are yet to be identified.

It is anticipated it will take three years to complete the necessary planning tasks



and construction of facilities for the Three Capes Track. However, upgrading of the existing Great Short Walk at Cape Hauy will be undertaken during the second half of 2011.

There will be a formal public comment period when the Development Plan and Environmental Management Plan (DEMP) is finalised and released (expected late 2011).

Inappropriate development

The Tasmanian National Parks Association believes the current Three Capes Track proposal is the wrong track for the following reasons.

- The huge scale of proposed development (incorporating the construction of five accommodation nodes) is totally inappropriate for a national park and conflicts with conservation objectives of a national park as laid out in the Nature Conservation Act 2002
- A spectacular cliff-top walk from Waterfall Bay to Fortescue Bay, taking in Cape Hauy and Cape Pillar, is already in existence (known as the Tasman Coastal Trail). This walk, currently listed on the Parks and Wildlife website as one of Tasmania's Great Walks, would be less costly to upgrade, whereas the Government proposal to incorporate Cape Raoul will involve considerable expense and difficulty, including dependence on provision of water transport across Port Arthur Inlet.
- The use of hut-based accommodation in lieu of tents goes against the results of the survey of walker attitudes provided in the Master Concept Plan which indicated only 19 per cent of the 537 people surveyed wanted huts.
- The proposal assumes most walkers want a five-six day walk rather than a three-four day walk. While the survey of walker attitudes indicated a strong preference among independent walkers for a five-six day walk (42 per cent), the majority of commercial walkers stated a preference for a three-four day walk (51 per cent). As the latter group is being targeted by the proposal, the TNPA believes a three-four day walk is the preferred and better option. (This is backed up by experience elsewhere in the state where three-four day walks such as Frenchman's Cap, Mount Anne, are preferred over longer walks. Experience also indicates many people walk the Overland Track in four or five days, not the recommended five-six days). Experience overseas, such as Milford Track in New Zealand, also indicates a preference for three-four day walks.
- The incorporation of a boat trip halfway along the track is cumbersome and expensive. Furthermore, large storm swells which occur within the Port Arthur Inlet would make the crossing dangerous (or impossible) on occasions. It will also be costly to build a jetty which can withstand these damaging



Indicative modelling illustrating the highly intrusive nature of an overnight accommodation node to be built near Retakuna Creek within the Tasman National Park associated with the proposed Three Capes Track. Prepared by Chris Bell, Bob Brown and Peter Whyte for the TNPA.

swells in what is now a pristine part of the coast. Furthermore, as demonstrated by the inability in recent years to maintain an economically viable ferry service to Maria Island, the ability to maintain a ferry service in relation to the Three Capes Track must also be questioned.

- There are potential conflicts with other walks in the region and may deny walkers who wish to have a tent-based experience access to camping sites in the Tasman National Park.
- The proposed high cost to do this walk (\$200 per person) may deter walkers from this region who will opt instead to do other walks in the state for which no fee is charged. Indeed, data published by the Parks and Wildlife Service indicates that compared to 2004-05 visitor numbers to the Cradle Mountain region actually decreased by around seven per cent the following year when fees were first charged for the Overland Track, and by 2007-08 visitor numbers were still down by four per cent.
- While the Tasman Peninsula offers some spectacular coastal scenery, it does not offer the wilderness values associated with many of the other overnight walks in Tasmania and as such may be less attractive

as a walker destination.

- As the Tasman Peninsula is significantly drier than the central highlands where the Overland Track is located, water availability would be a significant issue. As the proposal anticipates up to 10,000 walkers a year it is questionable whether or not the water needs of all these people can be met. There is also a real threat posed by bush fires with limited options of escape due to the predominance of seaside cliffs.
- There are significant potential environmental impacts. For example, there is a significant risk of the spread of the phytophthora cinnamomi root rot and disturbance to sea-eagle nests.
- Both the construction and maintenance of this project would be heavily dependent on the use of helicopters. These are very expensive to operate and the operational costs will continue to go up. They are noisy and incompatible with the aim of providing a peaceful and remote experience within a national park.
- Accommodating tourists inside the national park (up to 50,000 bed nights per annum) will directly compete with tourism initiatives in the Tasman community.
- The economic benefits cannot be guaranteed and are likely to be small.

A 5-6 day walk leaves little extra time for visitors to spend on other activities in the region and the results of a KPMG study indicated annual benefits to the Tasman region from the track may be as low as \$1.4 million. This does not seem to be a good return on an investment of \$33 million.

- The claim by the Tourism Industry Council Tasmania that the annual benefits from the Three Capes Track alone amount to \$190 million per year is also seen to be false when considered against the economic benefits of the entire Tasmanian Wilderness World Heritage Area which have been estimated to be \$190 million per year (see media release by Hon Peter Garrett – A World of Value in Heritage).
- Finally, as indicated by the huge cost overruns incurred on the recent upgrading of the Wineglass Bay Lookout track, the TNPA believes the costs of constructing the Three Capes Track has also been significantly underestimated and that large costs associated with this development would be an unacceptably extravagant use of public funds when the State Government is cutting services and the Parks and Wildlife Service requires additional funds to effectively maintain the existing values throughout the Tasmanian reserve system.

GREAT TASMAN COASTAL EXPERIENCE

Tracking the 3 capes development

2006

March

Tasmanian Great Bushwalk Scoping Study (Planning for People, 2006) completed for Government (not publicly released).

2007

January

Tasmanian National Parks Association (TNPA) learn of the proposed Three Capes Track development.

February

TNPA writes to the Minister expressing concerns about key elements of the proposal – recommending instead an alternative Two Capes Walk using the existing Tasman Coastal Trail.

May

Three Capes Track Feasibility Study released (as per the original proposal) – this is the first public information about the concept – no call for public comment.

Mid-late 2007

TNPA reviews the Feasibility Study and writes to the Government to express concerns with the proposal. Meet with Scott Gadd, then Secretary of the Department – no response to the TNPA's concerns. TNPA works with the Peninsula Environmental Network to raise awareness of the issues with the Three Capes Track proposal – produces Two Cape Iconic Walk proposal and pamphlet.

2008

February

The Draft Tasman National Park and Reserves Management Plan 2008 is released for public comment. The Draft Plan contains numerous changes which allow for the proposed Three Capes Track (3CT).

March

The TNPA and 248 others provide submissions on the Draft Tasman National Park and Reserves Management Plan 2008 to the Resource Planning and Development Commission (RPDC). Only eight submissions give unqualified support for the proposal, while 209 submissions are opposed to the 3CT and to changing the Tasman National Park Management Plan to allow 3CT to proceed. But in Jan 2009 the RPDC does not recommend against the 3CT.

April

Economic Impact Analysis for Three Capes Track (Syneca 2008) completed for Parks and Wildlife Service (PWS). (Not publicly released).

TNPA obtain a copy and have concerns about some of the assumptions the findings rest on.

2009

January

PWS release a pamphlet summarising the Three Capes Track proposed development – still no more detail than the May 2007 Feasibility Study (but walkers will now walk east, not west).

March

TNPA launch their Keep the Capes Wild postcard campaign and start an information campaign through Salamanca Stalls and a

series of meetings with State Government, local Government, politicians and tourism operators. TNPA works with the Tasmanian Conservation Trust and Environment Tasmania on this issue.

Early-mid 2009

PWS take interested local council members on a helicopter flight from Lake St Clair to Windy Ridge Hut [the one there have been so many complaints about] to look at the type of hut to be built on the 3CT.

June

The Greens and Liberals ask Michelle O'Byrne some tough questions about the 3CT proposal and costs in the budget estimates hearings. Government admits the cost of the proposal is now about \$30 million, not the \$15-18 million originally envisaged – vindicating TNPA's alternative costing of at least \$25 million.

Mid-late 2009

PWS announce they will spend \$200,000 on commercial expressions of interest for the Three Capes Track development in 2009-10 (while existing PWS infrastructure is closed due to a lack of funds for repair).

2010

Early 2010

TNPA lobbies all major parties for a Two Capes alternative with boosted day-walk opportunities in the lead up to the election.

March

The Tasmanian 2010 Election – only days before the election the Federal Government announce they will partly fund the 3CT. At the same time the Greens environment spokesperson announces the Greens support the proposal 'in principle' (later found not to be the case – but the comment caused considerable damage to getting alternatives looked at).

April

TNPA continue the Keep the Capes Wild postcard campaign and continue meetings with new parliamentarians (ongoing)

December

The Three Capes Track proposal is still on the table with no more detail than in the 2007 Feasibility study – there is no finalised revised Management Plan that allows for the Three Capes Track there is still no business plan (although two thirds of the funds have been secured), no Environmental Impact Assessment and no actual detail of the proposed development there is a Three Capes Track Project Manager employed by the PWS, and as at Jan 2011, a position for a Track Construction Supervisor had been advertised.

2011

Mid-2011

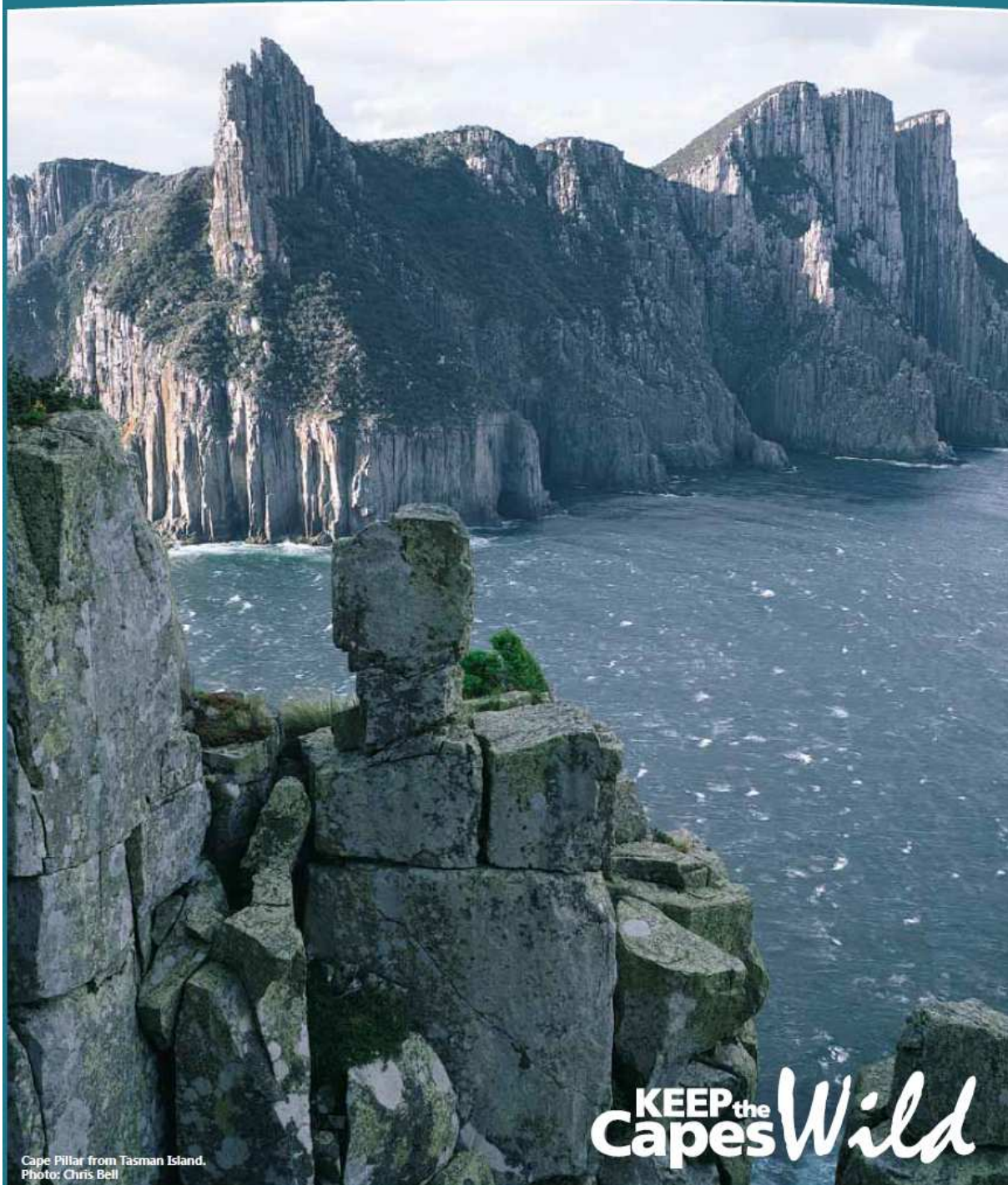
Upgrade to Cape Hauy track commences using funding provided by the Federal Government

Late 2011 or early 2012

Development and Environmental Management Plan (DEMP) to be released for public comment.

Note – Over this time period there have been four ministers for Parks – Paula Wriedt, Michelle O'Byrne, David O'Byrne and now Brian Wightman. And there has been one major departmental reconfiguration.

GREAT TASMAN COASTAL EXPERIENCE



Cape Pillar from Tasman Island.
Photo: Chris Bell

KEEP the
Capes Wild

Contact us

This report was prepared by the Tasmanian National Parks Association. For more information please visit the Keep the Capes Wild website, www.keepthecapeswild.org.au.

For more information about the TNPA please visit www.tnpa.asn.au.

Published August 2011.



www.keepthecapeswild.org.au

ATTACHMENT 2

MERCURY SOAPBOX ARTICLE: TAKE A WALK ON TASSIE'S WILD SIDE - 30 JUNE 2012

p26 30-6-12

Take a walk

on Tassie's wild side

The Tasman Peninsula has many brilliant walks, we should look to Victoria to see how to properly market the coastal trek experience, writes bushwalker Robert Campbell

GIVEN recent reports that visitor numbers to Tasmania have declined by 5 per cent, and calls from the tourism industry for greater promotion, I was reminded of a story about the Great Ocean Walk in Victoria.

Dual Winter Olympics figure-skating gold medallist Katarina Witt, while commentating during the last Winter Olympics, talked ecstatically about her recent trip to Australia and her experiences doing this walk.

What a promoter's dream, I thought!

This walk along the Victorian coast from Apollo Bay to within sight of the magnificent 12 Apostles attracts 45,000 visitors a year.

A website dedicated to the walk explains its popularity. Based on a partnership between tourism operators and Parks Victoria, it offers the freedom of choice for the tourist in options such as the number of days, type of accommodation, walks and price, together with a wide choice of hospitality services such as gourmet meals, massages and interpretative wildlife and cultural tours.

By offering transport to and from accommodations, ranging from basic campsites to modern eco-lodges, the walk provides a key source of product diversification and innovation to the market and is instrumental in personalising the experience for many visitors.

While Tasmania has a diverse range of walking tracks, with the



world-famous Overland Track attracting about 8000 walkers a year, none matches the diversification offered by the Great Ocean Walk.

And with a proposal to build yet another track, the Three Capes on the Tasman Peninsula, I wonder whether Tasmania is missing an exciting opportunity to offer a new type of tourism product that has proven successful interstate and overseas.

Indeed, the type of walking model adopted for the Great Ocean Walk would clearly suit situations such as that found on the Tasman Peninsula, where a diverse range of visitor options already exists.

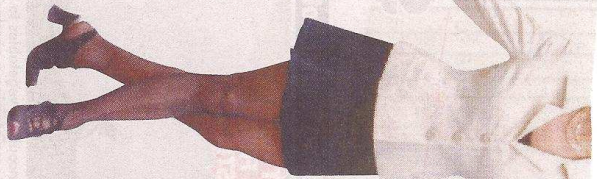
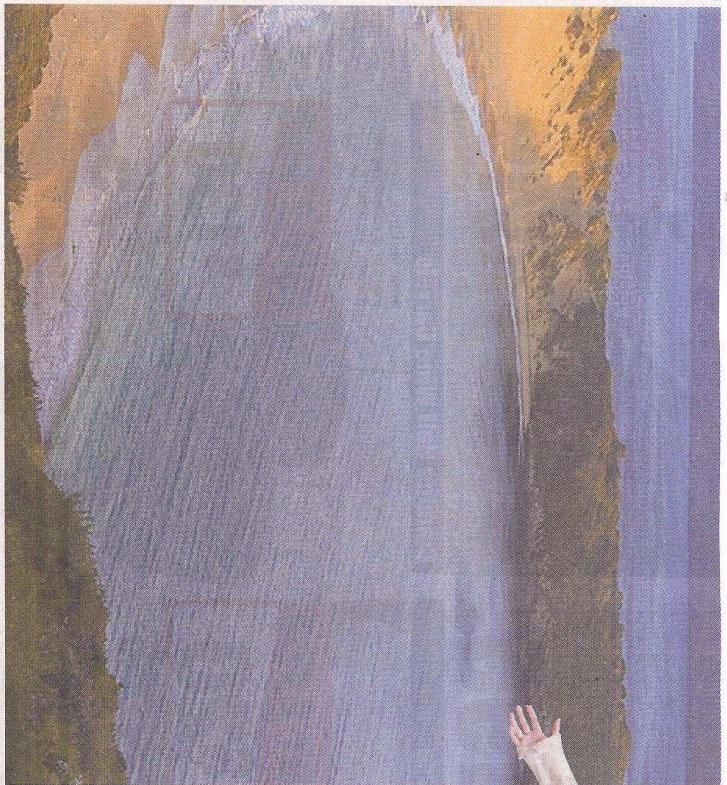
This would build on the distinct advantages that the region has as a tourism destination. These include one of Australia's great cultural icons, Port Arthur, some of Australia's most magnificent coastal scenery (which is already accessible

via more than 30 day and multi-day walks, including the Tasman Coastal Trail, one the five Great Bushwalks in Tasmania), and a diverse range of other tourist opportunities provided via a host of existing tourism operators.

While there are already many visitors to Port Arthur, the question that needs to be asked is why these visitors are not extending their stay and making use of the other experiences on offer in the region.

And why will building another walking track change this when a diverse range of walking experiences already exists?

What is presently missing is not another track but an integrated tourism strategy for the Tasman Peninsula based on upgrading the existing day and multi-day walks and combining them with the cultural, outdoor adventures and



NATURAL BEAUTY: Tasmania's stunning Crescent Bay, left. Picture: TED MEAD



HIGH ACHIEVEMENT: Katarina Witt, left, was very impressed by Victoria's Great Ocean Walk, above.

ABOUT THE AUTHOR

Dr Robert Campbell is Tasmanian National Parks Association president, and was a foundation member when it formed in 2001.

Since 1988 he has worked full-time as a marine scientist with CSIRO Marine and Atmospheric Research.

Dr Campbell completed his PhD in mathematical physics in 1986 and also has a Masters of Environmental Science.



hospitality experiences offered by the region. Consider, for example, the following illustrative itinerary for interstate visitors –

□ **SATURDAY:** Arrive Hobart full of anticipation, drive to and explore Eaglehawk Neck and surrounds, including the tessellated pavement, Tasman Blowhole and Doo Town. B&B accommodation and local dining. Evening walk along Egg Beach with moonlit views across Pirates Bay.

□ **SUNDAY:** Day walk to Cape Raoul, with magnificent views over Australia's highest coastal cliffs and the mountainous surf of Shipstern Bluff. B&B accommodation, intimate dinner and spa.

□ **MONDAY:** Walk through Remarkable Cave, along Crescent Bay

and visit the world heritage-listed Port Arthur. B&B check-in and dinner before investigating the paranormal on a Port Arthur Ghost Tour.

□ **TUESDAY:** Start Tasman Coastal Trail, with magnificent coastal cliff scenery from Tasman Arch to Portseque Bay via Tannells Hill with extensive views. End day swimming and camping under the stars.

□ **WEDNESDAY:** Continue the Tasman Coastal Trail and take in the views to the Toren Pole, Candleslick and the lanterns from Cape Henty, before proceeding over Mount Fortescue with panoramic views of Cape Pillar. Camp at Relatanna Creek.

□ **THURSDAY:** Walk the coastal trail via Perdition Ponds to The

Blade, Chasm Lookout and Cape Pillar, to see soaring views across to Tasman Island. Camp at Hurricane Heath.

□ **FRIDAY:** Walk out through coastal forest to Portseque Bay for well-deserved swim. B&B accommodation, massage and celebratory dinner.

□ **SATURDAY:** Relax and swim while exploring Lime Bay Reserve and Roaring Beach, or visit the convict past at the probation stations at Nubeena, Koonya and Premaydara. Or get friendly with a local Tasmanian devil. B&B accommodation and last chance for savouring the local produce.

□ **SUNDAY:** Spectacular coastal boat cruise (ideally back to Hobart). Flight home, your head

buzzing with exquisite memories! Endless variations on this theme exist that allow visitors to mix the diverse walks and experiences found in the region.

Furthermore, flexible transport arrangements like those on the Great Ocean Walk would provide off-park accommodation for those seeking more up-market options. Indeed, the ability to offer such options appears to be central to the success of this tourism experience.

Properly marketed under a banner such as "The Great Tasman Coastal Experience", with a dedicated website, promotional advertisements and a TV documentary using well-known personalities, such a diversified product would attract a greater number and range of tourists to the region, enticing them to extend their stay beyond a visit to Port Arthur

and bring greater economic benefits. Alternatively, having people spending all their time on a single walk and staying in huts within the park, as presently proposed with the Three Capes Track, offers a limited product limiting the range of visitors and the benefits to a few.

A unique advantage of the Tasman Peninsula is that there is a community living in juxtaposition with the Tasman National Park, and ideally a mutually beneficial relationship between tourism operators should be nurtured rather than a competitive one.

Tourism must compete for the attention of customers. We therefore need to be imaginative and creative in marketing our products and offer experiences that people seek.

We should not just build more things at great expense and hope that visitors will come.

ATTACHMENT 3

Submission by the **Tasmanian National Parks Association** in relation to the:

DRAFT DEVELOPMENT PROPOSAL AND ENVIRONMENTAL MANAGEMENT PLAN: THREE CAPEs TRACK PROPOSAL, TASMAN NATIONAL PARK

23 December 2011

Tasman National Park is one of the gems in the Australian national park system; it represents a largely unmodified coastal wildland. NPT members are frequent visitors to the area, which is a unique and accessible landscape of considerable photographic interest. The of 'villages' of modern buildings serviced by helicopters would run counter to the experience that can otherwise be had in this intact coastal wildland. NPT values the park for its wildness – few areas of such spectacular coastline remain unaltered in temperate Australia; we should be safeguarding those special attributes, not promoting developments that are inimical to the values we have come to expect from our national park system. (Nature Photographers Tasmania, response to questionnaire, quoted in Three Capes Track, Social Impacts and Values, TRC, July 2011)

A. SPECIFIC ISSUES

Inappropriate Size of Development for a National Park

The TNPA notes that the DPEMP consists of a main document of 167 pages together with 13 Appendices comprising an additional 1250 pages. In total the DPEMP comprises in excess of 1400 pages. While the TNPA notes the apparent comprehensiveness of these documents, the large amount of work that has been undertaken underlies the fact that this is indeed a project of substantial size. It is no little walking track through a park but instead a major commercial sized development.

This is reinforced by the fact that the DPEMP acknowledges the direct footprint of the proposal (associated with the extensive clearance of vegetation for the track, 9 overnight nodes, heli-pads, toilets and viewing platforms) is around 17.6 ha. Assuming an average suburban house block of around 600 m², this means that the proposal will have a footprint equivalent to around 290 suburban house blocks. This is not small a small footprint by any extent of the imagination! (The proposal can also be seen as having a comparable footprint to the large desalination plant being built at Wonthaggi in Victoria, estimated to be around 20 ha).

The large scale of the proposal, the extensive clearance of vegetation, and the associated risks to the natural values of the park (both during the development and operational phases) are incompatible with the management objectives of a National Park. Instead the proposal is about building a large commercial facility comprising nine large huts, two jetties, a number of new access roads, car parks, toilets, and pedestrian tracks to a very high standard – all for the comfort of fee paying visitors. It is not about preserving the natural, primitive or remote character of the Tasman National Park. This view is clearly reflected in the quote above. It is a sad reflection on the commercial priorities of this Government, and its concomitant lack of commitment to protecting Tasmania's unique conservation reserves and the unique natural values contained within, that this proposal was not stopped once this inconsistency become obvious.

Against Reserve Management Code of Practice and National Park Act

On page 7 of the DPEMP it is stated that the "PWS is committed to using the *Tasmanian Reserve Management Code of Practice 2003* as the guidance document for activities within the Tasman reserve system, including the development of new activities that may impact on these values." On page 6 of this

Code of Practice it is stated that: *“The primary objective of reserves is the conservation of natural and cultural values.”*

This primary objective is reinforced in the stated Principles of Reserve Management listed on page 12: *“Protection and maintenance of natural and cultural values is a fundamental objective in managing reserved areas and should direct all aspects of management. As far as practicable, the effects of management on the full range of natural and cultural values should be considered in determining appropriate practices.”*

Schedule 1 of the Nature Conservation Act 2002 also sets out the purposes of reservation for the various classes of reserved land. For a National Park it is *“the protection and maintenance of the natural and cultural values of the area of land while providing for ecologically sustainable recreation consistent with conserving those values”*

While the management objectives for the class of reserves known as National Parks includes the provision for tourism, recreational use and enjoyment, these need to be consistent with the conservation of the national park’s natural and cultural values. However, as the Three Capes Track proposal achieves no conservation objectives, and as the provision of recreational opportunities is already adequately catered for by the existing network of tracks and camping opportunity in the park, the primary objective of the present proposal must be seen as ostensibly commercial. Furthermore, as will be demonstrated below the proposal is not consistent with the conservation of the natural and cultural values within the Tasman National Park, and as such, the proposal is not consistent with the primary management objective of a National Park or the Nature Conservation Act or consistent with the Tasmanian Reserve Management Code of Practice.

The fact that commercial interests have been given precedence over the conservation objectives of park management is reinforced by the many statements in the DPEMP which indicate that the comfort of the walkers is given a higher priority than the protection of the natural values within the park. For example, in relation to the track it is stated that *“mud or puddles are not acceptable”* (p18) while in relation to the design of the huts it is stated that the *“location and design of facilities is to go beyond a purely utilitarian look”* (p27). This reversal of priorities does not reflect the high level of appreciation for the natural attributes of the Tasman National Park and the concern for their protection found amongst stakeholder groups and local residents, as noted in Appendix J (Social Impacts and Values).

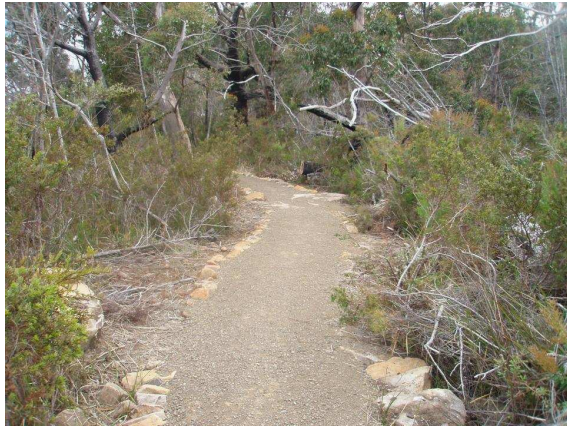
The Track

The Three Capes Track proposal will require the construction of 60.3 km of walking track, consisting of 40.6 km of new track and 19.7 km of existing track. According to the design specification for the track (listed on page 18) the entire track is to be built to a Class 3 standard with a width of 1 meter and hardened with gravel and rock. Exposed natural soils will not be acceptable, except for sections of exposed bedrock. Supportive walls for medium and heavy benching will also be required.

Given these design criteria and the supporting photos (presumably from recent works on the Cape Haug Track) it would appear that in essence what is being proposed to be built is a hardened footpath which will run along the entire coastal rim of the park. This impression was confirmed by a recent visit to inspect the new track being built out to Cape Haug – see Figure 1.

It is arguable why this is necessary, especially for the more remote yet-to-be-constructed sections of the proposed Three Capes Track. Construction of this scale and style everywhere is unnatural and not very cost effective (but as costings are not presented in Appendix A this cannot be assessed). Furthermore, a wide track is really only necessary where high use requires frequent passing. Given Three Capes is to be a predominantly one-way walk, and most would agree the user experience is enhanced if a track is narrower, why not build it narrower (it could still comply with Class 3 standards if <1m).

Figure 1. Recent photos taken of the Cape Haug track which is under construction (Source, HWC).



The draft DPEMP states (section 2.2.1, p. 17-18) “meeting this (upper Class 3) standard is a key driver in route selection, particularly in the gradients experienced along the route as the track will not exceed 8° for the majority of its length.” However, this is demonstrably not the case for works being currently undertaken on the Cape Hauy track, partly as a result of ignoring recommendations in the Appendix A Track Survey report. This has consequences for cost and ongoing maintenance, and does not inspire confidence in the future approach to the Three Capes Track development. Indeed, the TNPA understands that the durability of the new Cape Hauy track needs to be questioned, as a lower level of binding clay in the material being used to build the track will leave it vulnerable to erosion by the weather and storm events. This is also reflected in the short warranty (only one year) being offered on the track.

As indicated by the photos shown in Figure 1, the clearance of vegetation associated with the construction of the track in places is also considerably wider than the 1 m width of the track described in the DPEMP. As indicated by the two photos on the bottom left and the right, the area cleared for the track cuts a wide and clearly unnatural swath of at least 4-5 m through the vegetation, with a quite messy litter of cuttings left by the side of the track. Unless some remedial work is undertaken this is clearly degrading to the natural values and visual amenity of the area.

The TNPA questions the need to build a track larger in scale than required with the resultant unnecessary costs (more visually intrusive and higher construction cost). One unstated possible explanation is to be able to use machines, but Appendix A explicitly states this was not considered in estimating construction costs (hence the estimated costs may be very wrong; perhaps why they haven’t been presented). Extensive construction of a wide track using machines is usually a trade off of construction expediency versus user experience (the latter losing out).

What is proposed then is not a standard ‘walking track’ / ‘walk’ experience (as the name suggests) within a National Park, but one that is highly engineered with related infrastructure requirements which are not appropriate in a National Park whose primary purpose is conservation.

The track as described (together with the accompanying photos) will result in a highly artificial structure in a natural area. Indeed, being constructed entirely from gravel and stone, with extensive stone edging and stone steps and laid out in a gardenesque / urban park style, it will appear as a highly unnatural man-made piece of infrastructure within a highly pristine natural area, particularly given its length. Members of the TNPA and Tasmanian Bushwalking Club know of no other comparable track anywhere in the world where a multi-day track has such a highly constructed walking track. On page 17 of the DPEMP it is stated that *“the track is to be constructed in such a way that will...allow users to experience the ‘wildness’ of the area”* However, the TNPA argues that such a level of track design will actually have the opposite effect and deter the sense of wildness. The use of externally sourced material for the track will likely exacerbate the unnatural visual nature of the track. And to imagine 60 km of this threaded through a near pristine National Park is quite alarming!

Overnight Nodes

On page 16 of the DPEMP it is stated that *“a key component of the Three Capes Track is the public huts”*. Public huts will sleep up to 48 people with private huts accommodating 13 people location within 1 km of each public hut.

The footprint of the five overnight nodes for the public huts is estimated to be 3.34 ha. This is an average 0.67 ha per site. Again, assuming an average suburban household block of 600 m², this means that each overnight node will, on average, have a footprint equivalent to around 11 suburban house blocks. As the commercial huts are expected to have a similar footprint, this will result in 9 accommodation zones each having a footprint equivalent to around 11 suburban blocks or 100 blocks in total. This is equivalent to building a number of small village sized nodes within the National Park. As already stated previously, this is entirely inappropriate within such a park.

The level of clearance of existing vegetation associated with the Bushfire Protection Zones (BPZ) with each overnight node is also extensive and will result in the obliteration of most of the natural vegetation cover within these zones. For example, Table 2.2 specifies that no more than 3% of the BPZ can have a cover of mid-storey plants. As the exact location and size of the BPZs are yet to be finalized, and the possible construction of fire retardant walls may yet be considered (which will only add to the unnatural character of the accommodation nodes) there are no guarantees as to the final impacts within the BPZ around the accommodation nodes. Furthermore, an expansion of the BPZs to allow for the retention of some trees would also result in the increased clearance and impact on under storey species. Again, this level of impact on the natural values within the Tasman National Park is unacceptable.

In relation to the huts themselves the DPEMP is quite deficient. Despite being critical to assessing the impact of the proposal there is at present no design for the huts. For example, in not knowing the final height of each hut how do we know, for example, that the Surveyors Cove hut will not be visible from the Port Arthur Historic Site. The fire management section also indicates that the huts may be constructed of fibre cement sheet or even corrugated iron for fire protection purpose – which will be most unsuitable for a national park and for providing a natural aesthetic. Finally, it is stated that if huts cannot be positioned to capture spectacular views, then viewing platforms will be constructed nearby. This will obviously add to the footprint of the nodes and impacts on natural aesthetics of the area.

The DPEMP also states that there will not be any camping facilities at the overnight nodes (p27). For most people the inability to camp whilst on an overnight walk is inconsistent with the bushwalking experience they are seeking. This view is supported by the results of the survey walker attitudes reported in the Master Concept Plan, where of the 537 people surveyed only 19% wanted huts. Walkers also indicated that it was important that they do not have to camp with large groups (more than 8) – yet the proposed huts will accommodate up to 48 people.

The comment on page 27 of the DPEMP that *“the design of facilities is to go beyond the purely utilitarian look”* reinforces the design concepts outlined in the Master Concept Plan that visitors will

experience “*comfortable facilities that are beautifully designed and inspiring*” (p11). However, this emphasis on comfort goes against the intentions of a walk in the wild where immersion in a natural place should dominate the experience and not human infrastructure. Again, the qualities sought by the surveyed walkers strongly emphasised the desire to experience “*Unspoilt natural scenery*”, “*Being close to nature*”, “*Wilderness*” and “*A Challenge*”. There are plenty of beautifully designed places to stay outside of our parks and, as such, there is no need to place such buildings in our parks which are managed primarily for conservation purposes, not to provide beautiful scenery for a wealthy few whilst they sit back sipping their wine at the end of an easy days walk. Indeed, a great majority of walkers surveyed placed a premium on experiencing the wilderness, a sense of escape and solitude and a sense of challenge.

Finally, the Tasman Peninsula is drier than the central highlands where the Overland Track is located. As such, it is more suited to tent based camping than huts

Existing Walking Tracks and Campsites

The DPEMP does not state what will happen to the existing network of working tracks within the Tasman National Park which are not to be included within the Three Capes Track proposal. Will all such walking tracks to be maintained? For example, what is to happen to the existing direct track between Fortescue Bay and Cape Pillar. If these existing tracks are not to be maintained then the proposal will limit the existing recreational opportunities and freedom of use of traditional walkers in the park.

At the moment there are a number of options for camping within the national park on the Cape Pillar/Mt Fortescue walk. Indeed, there are essentially no restrictions on camping anywhere in the park, though usually seek to minimize their impact by camping within one of the numerous camp sits scattered along the existing tracks. However, this freedom is to be curtailed with only two (perhaps only one) campsites to be made available along this route. It also limits the ability of people who do not want to camp with others but seek a solitary experience with Nature. And it is this ability to connect with Nature which should not be compromised. The fact that the DPEMP also notes that the PWS reserves the option of introducing further management measures to restrict camping options is of great concern, as it appears that the enjoyment of those who wish to enjoy the natural surroundings of the Tasman National Park using the existing tracks and campsites will be curtailed at the expense of fee paying customers being feed along the Three Capes Track. This is unacceptable.

Jetties

The incorporation of a boat trip halfway along the track is cumbersome and expensive. Furthermore, large storm swells which occur within the Port Arthur Inlet would make the crossing dangerous (or impossible) on occasions. It will also be costly to build a jetty or pontoons which can withstand these damaging swells in what is now a pristine of the part of the coast. The DPEMP also does not specify any schedule for the ferry service and as such it remains unknown whether walkers will suffer long delays in making this crossing. If long delays are experienced this will be annoying and diminish the walker experience as it is an escape from such schedules that one seeks when walking in wild places. Furthermore, as demonstrated by the inability in recent years to maintain an economically viable ferry service to Maria Island, the ability to maintain a ferry service in relation to the Three Capes Track must also be questioned.

Furthermore how is uncontrolled access to the national park to be prevented from the jetty/pontoon to be placed at Denman’s Cove?

Lookouts

On page 17 of the DPEMP it is stated that at prominent look out points “...a larger area may be constructed in order ...to prevent environmental damage”. So in order to understand this correctly, the

area is to be cleared of all vegetation and then sealed in a highly resistance layer of gravel and stone in order to protect the natural values of the area. If this isn't an oxymoron then I do not know what is!

The DPEMP does not state where or how many lookouts are to be built and as such the document clearly fails in assessing the impacts of any proposed structures of this type.

Gateway

The gateway at Noyes Road is to be located within the park so as to offer an “*enhance the visitor experience and the aesthetic appearance of the site*”. No mention is made of protecting the values of the site and again the recreational experience is given precedence over the protection of natural values.

Visual Impact

As stated previously, the high design criteria, the over-engineering of the track and the fact that it is being constructed from material imported from outside the park (being of a different texture and colour to the natural soils) will heighten its visual impact. As such, the TNPA believes that the impact of the track on the visual and natural aesthetics of the Park has been significantly under-estimated by the assessment in the DPEMP.

The TNPA also believes that the assessment of the visual impact of the overnight nodes offered in the DPEMP is misleading as the analysis is based on the visual impact of the single hut alone (having a roof area of 206 m²). However, the overnight nodes will consist of a mosaic of infrastructure (including multiple huts, toilets and a helicopter landing site) embedded with a much large BPZ, which based on the estimates provided in Table 2.3 of the DPEMP may be in excess of 4000m² (twenty times larger

Figure 2. Indicative modelling illustrating the highly intrusive nature of an overnight accommodation node to be built near Retakuna Creek within the Tasman National Park associated with the proposed Three Cape Track. (Prepared by Chris Bell, Bob Brown and Peter Whyte for the TNPA).



than the hut alone). In order to gain a better understanding of the potential visual impact of an overnight node the TNPA has had some indicative modeling undertaken. Shown in Figure 2 this illustrates that the visual impact will not be small as stated in the DPEMP. It is a clear failure of the DPEMP that similar indicative modeling was not undertaken for each overnight node, as without such modeling the assessment of the visual impact can be nothing more than guesswork.

Impact on Wilderness Quality

The DPEMP fails to consider the fundamental importance of wildness (or wild character) for the Tasman National Park. There has also been no consideration in any of the reports prepared of the affects of the Three Capes Track proposal on wilderness values within the Tasman National Park. This is despite consideration of such values required by both the National Parks and Reserves Management Act 2002 and the Parks and Wildlife Service's RAA process.

The key statutory tool for the management of reserved land in Tasmania is the National Parks and Reserves Management Act 2002. According to this Act the objectives for the management of a National Park includes:

- *to preserve the natural, primitive and remote character of wilderness areas*

Section 4.4 of the Tasmanian Reserve Management Code of Practice (p23) also sets out the following objectives for protecting wilderness and wild rivers

- *minimise the effects on wilderness quality of disturbance from human activities within high quality wilderness areas;*
- *restore or enhance wilderness quality in areas within, or contiguous with, high quality wilderness areas, where the wilderness quality has been degraded by past activities;*

The Code of Practice further states that “Wilderness values are best protected by minimising human disturbance in high quality wilderness areas, and by maintaining the remoteness of wilderness areas from developments and access”.

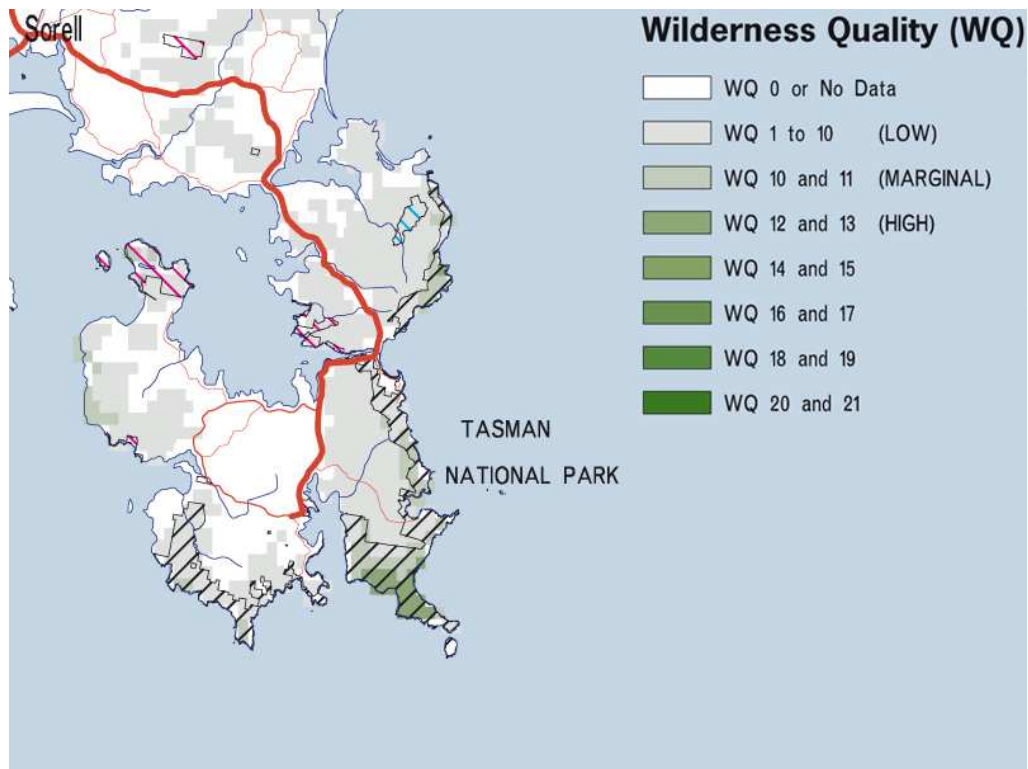
In order to meet these objectives, the Basic Approach to management outlined in the Tasmanian Reserve Management Code of Practice in relation to protecting wilderness values includes the following prescriptions:

- *Activities in areas of high quality wilderness that could detract from the wilderness quality should be avoided.*
- *Activities in high quality wilderness should be carried out in a manner consistent with the maintenance or enhancement of wilderness quality.*
- *Where an activity with the potential to detract from wilderness quality is proposed in or near a high quality wilderness area, consideration will be given to confining the activity to areas of lower wilderness quality outside or toward the periphery of the high quality wilderness area.*

A mapping of wilderness quality within the Tasman Peninsula is shown in Figure 3 (on the next page). This assessment, undertaken during the 1995 RFA using the National Wilderness Inventory (NWI) methodology, shows an area of high quality wilderness (defined by the RFA as wilderness quality >12) on the Cape Pillar Peninsula. The overnight node complex proposed for a site above Lunchtime Creek is located within this high quality wilderness zone (itself in an area having a wilderness quality rating of 13-14) and as such would have a significant degrading affect on the wilderness value of this zone, the only remaining area of high quality wilderness on Tasman Peninsula. The same can also be stated for the highly designed track (or over-engineered footpath) through this region together with the large number of walkers that it is designed to bring. The overnight node at Retakunna Creek, being just outside this high quality wilderness zone and itself in an area with a wilderness quality rating of 10-12, will also have a degrading impact the wilderness quality of the area. Furthermore, the proposed track is very extensive (in effect running the length of the Tasman National Park), hence leaving no part of the narrow coastal corridor that comprises the Park unaffected.

Given the clearly stated objectives of both the National Parks and Reserves Management Act 2002 and the Tasmanian Reserve Management Code of Practice to i) preserve the natural, primitive and remote character of wilderness areas, and ii) avoid activities in areas of high quality wilderness that could detract from the wilderness quality, the proposed Three Capes Track is clearly in breach of these objectives. Wilderness (or wildness) is a diminishing resource which needs to be protected.

Figure 3. Mapping of wildness quality within the Tasman Peninsula. (Source: National Wilderness Inventory, Environment Australia).



From communication with Peter and Shirley Storey and others who fought to establish this park, the preservation of wild character was the fundamental objective of their campaign. In other words, their aim was to prevent development within the boundaries they proposed for the park, so that its wild character would be protected for people to experience if they sought it through self-reliant visitation that left the area no less wild for subsequent visitors. Any development would therefore be restricted to a few tracks, small camp clearings or tent platforms and basic toilets.

Historic Cultural Heritage:

The TNPA notes the narrow scope of the EIA associated with the impact of the Three Capes Track on the historic sites in the region. As made clear in Entura (2011, table 5.2, p33) the EIA only deals with the physical fabric of sites, and then only in the development corridor. It fails to address issues such as the setting of the sites, the potential impacts to sites near the development proposal, in particular the World Heritage listed Port Arthur penal settlement related suite of sites, and historic cultural landscape issues. As a WHA site, the protection of the values of the Port Arthur Historic Site carries considerably obligations.

Impact to the Values of the Port Arthur Historic Site

The TNPA notes that the DPEMP indicates there will be no impacts from the Three Capes Track proposal on the values of the World Heritage Port Arthur Historic Site. The TNPA does not believe that this is adequately demonstrated and believes that further, more detailed assessment is required. In particular -

1. The DPEMP (page 128) acknowledges that *“The most readily visible section is the shoreline extending south from Denmans Cove to Arthurs Peak”* which is the viewfield from the Port Arthur historic Site.
2. The DPEMP (Figure 4.10) demonstrates that the track in this area and the Surveyors Cove overnight node is within the viewfield from the Port Arthur historic Site.

3. The DPEMP assessment indicates that visual impacts are ‘highly unlikely’ only, and this is based on highly qualified comment (eg, ‘will not be readily visible, ‘strongly suggests’, etc) (page 132) that does not imply a high degree of confidence.
4. The TNPA questions the claim that visual impacts will be ‘highly unlikely’ from Point Puer because of its proximity to the Denmans Cove – Arthurs Peak shore, and notes that the assessment also fails to indicate the visual impact from the Isle of the Dead or Garden Point (Stewarts Bay Reserve), also part of the Historic Site and relatively close to the eastern shore.
5. The TNPA questions the validity of the assessment on the basis that the following also do not appear to have been factored into the assessment – the visibility of the Surveyors Cove overnight node, particularly given there is no exact location, no design for the buildings yet and no roof height restriction in the DPEMP); the proposed viewing platform (for which there is no location and no design); the impact of helicopters (which will be required for construction and ongoing servicing) and new regular (daily) boat services to Denman Cove on the landscape and setting values; that there is proposed to be 10,000 people a year using the track over summer; and the additional people who will visit Denmans Cove with the establishment of a track.
6. The impacts on the cultural and setting values of the Port Arthur Historic Site have not been assessed at all (the assessment is limited to a viewfield analysis). This is dependent on understanding the cultural landscape and setting values of the Port Arthur Historic Site which have also not been formally assessed to date (refer Attachment 2 – McConnell 2008)⁴.
7. The assessment has not considered the impact from the air from sightseeing flights and from higher level lookouts (while there are no higher level lookouts at present, it is likely that over-viewing lookouts will be developed (such as the former Palmers Lookout), and it is likely that the track, walkers and the Surveyors Cove hut will be much more visible from elevated viewing locations.

Impacts on existing natural values and biodiversity

The existing natural environment within the Tasman National Park, and the surrounding marine environment, has been identified as in a natural or near natural condition (DPEMP p85). There are no significant populations of introduced flora or fauna with *Phytophthora* being the most significant impact on the natural values of the park.

The DPEMP also notes that the key performance criteria when considering the potential impacts on the proposal on biodiversity are the following objectives of the *National Parks and Reserve Management Act 2002*:

- to conserve natural biological diversity;
- to preserve the quality of water and protect catchments;
- to protect the park against...adverse impacts such as fire, introduced species, diseases and soil erosion...

While the DPEMP states that the objectives of the Resource Management and Planning System (RMPS) in relation to the promotion of sustainable development also applies, the TNPA argues that this is not correct, and in any case is over-ridden by the specific objectives of the *National Parks and Reserve Management Act*. According to the website of the Tasmanian Planning Commission, in the early 1990's the Tasmanian government developed a set of objectives for resource management and planning. These objectives are included as a Schedule to each of the Acts that form part of the integrated system. There are a number of provisions within these Acts requiring that specific functions must ‘seek to further the objectives of the Resource Management and Planning System’. The principal Acts forming the RMPS, in which the Commission has a major role, are the *Land Use Planning and Approvals Act 1993*, *State Policies and Projects Act 1993* and the *Tasmanian Planning Commission Act 1997*. The *National Parks and Reserve Management Act* is not included as one of the principal Acts of the RMPS.

⁴ Although this document is dated 2008 and pre-dates the inclusion of the Port Arthur Historic Site none of the information, including with respect to assessment and buffer zones has changed.

Flora

As acknowledged on page 61 of the DPEMP the vegetation of the Tasman National Park is diverse and has significant conservation values. Of the 21 vegetation communities identified along the proposed track, all are currently in excellent condition.

The expected and potential impacts during the construction phase of the proposal on flora values within the Tasman National Park have been identified in the DPEMP as follow:

- Clearance and conversion of native vegetation within the track, overnight node and White Beach entrance footprint and temporary impacts within the wider construction footprint;
- Clearance and conversion of native vegetation communities listed as threatened under Schedule 3A of the *Nature Conservation Act 2002* within the track footprint and temporary impacts within the wider track construction footprint;
- Loss of individuals of species listed under the *Threatened Species Protection Act 1995*;
- Disturbance to and loss of potential habitat for species listed under the *Threatened Species Protection Act 1995* and the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC);
- Facilitation of the spread of weeds and *Phytophthora cinnamomi*; and
- Secondary impacts that may result from altered drainage and root disturbance.

The potential impacts of the operational component of the proposal on flora values have also been identified as follows:

- Introduction of weeds and the spread of *Phytophthora* along the track network;
- Damage from walkers leaving the constructed track
- Increased nutrient loads at the overnight nodes; and
- Collection of rare species.

The track will traverse three communities listed as threatened under the Nature Conservation Act 2002. Within one of these communities the species *Allocasuarina crassa* is listed as rare under the Tasmanian Threatened Species Protection Act 1995. Several populations of plant species listed as threatened on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) and/or the Tasmanian *Threatened Species Protection Act 1995* (TSPA) have also been recorded in the vicinity of the track. These are:

- *Cyathodes platystoma* (tall cheeseberry) [EPBCA: -; TSPA: r];
- *Deyeuxia densa* (heath bentgrass) [EPBCA: -; TSPA: r];
- *Euphrasia semipicta* (peninsula eyebright) [EPBCA: EN; TSPA: e];
- *Prasophyllum apoxychilum* (tapered leek-orchid) [EPBCA: EN; TSPA: e];
- *Prasophyllum castaneum* (chestnut leek-orchid) [EPBCA: CR; TSPA: e];
- *Prasophyllum pulchellum* (pretty leek-orchid) [EPBCA: CR; TSPA: e];
- *Stellaria multiflora* (rayless starwort) [EPBCA: -; TSPA: r].
- *Caladenia caudata* (tailed spider-orchid) [EPBCA: VU; TSPA: v];
- *Euphrasia amphisysepala* (shiny cliff-eyebright) [EPBCA: VU; TSPA: r];
- *Euphrasia* sp. Bivouac Bay (masked cliff-eyebright) [EPBCA: EN; TSPA: e];
- *Melaleuca pustulata* (warty paperbark) [EPBCA: -; TSPA: r];
- *Spyridium obcordatum* (creeping dustymiller) [EPBCA: VU; TSPA: v].

Two other unlisted by significant species have been noted from the vicinity of the proposed route while the area also supports a number of locally endemic species.

Despite the stated risks to the floristic values of the park, for each species listed above the DPEMP argues that the potential impacts are not considered to represent a threat to the conservation status of these species. However, these assessments are somewhat subjective as no reasons or cited research to support these statements is offered. This is despite the DPEMP noting for the three species *E. semipicta* and *P. apoxychilum* and *P. castaneum* that “any impact on individuals of these species or known habitat must be considered significant” (p90). For other species such as *E. amphisysepala* and *E. sp.*, which are stated to be restricted to cliff habitats, it is also stated that the proposed track will not result in any

disturbance. However, this assumes that all walker activity will be confined to the track itself and as such ignores the potential threats associated from walkers leaving the track to explore the views from the cliffs and to take photographs – which is highly likely. Given these deficiencies in the assessments, the TNPA considers that the conclusions reached significantly under-estimate the inherent risks posed to the natural values in the Park from the proposal.

Threats to EPBCA listed orchids

In order to demonstrate some of the inadequacies of the DPEMP in assessing impact on floristic values, we consider the three species of *Prasophyllum* that were identified in the survey. Although the proposal has re-routed the track to avoid the populations of *Prasophyllum* that were identified in the survey in the Ellarwey Valley area, the track is still within the catchment of the habitat for these orchids, and we believe potentially within their habitat. There is currently insufficient information about these orchids to be confident that the proposal will not impact these rare and threatened species in the general development area (note – the impacts in the DPEMP only address impacts in the actual development footprint – an additional cause of concern).

There are very few known populations of both these EPBCA listed *Prasophyllums* (*apoxychilum* and *castaneum*) and the proposed track passes directly through one of the very few known sites where these species occur. It is also likely that these species will be found to be more common than first thought in this area if the area was surveyed more thoroughly, since the identification is based on limited survey data. The DPEMP states that *Prasophyllum* like many orchids can respond positively (or negatively) to disturbance usually in the form of fire or slashing but often on tracks and firebreaks also. The difficulty is that there is very little data to support this anecdotal evidence and its unknown whether it is the disturbance event which has encouraged the plant out of dormancy or just whether the plants are more easily seen due to the area being opened up.

Given the paucity of data on how orchids respond to disturbance, including hydrological and trampling damage, it is difficult to see how the impacts (positive or negative) of such a track can be predicted on these orchids without further data. Given this, the TNPA believes it is not possible to predict the impacts on these species and, given risks of habitat disturbance from i) the location of the track, ii) the probability that walkers will go off-track and iii) risks from *Phytophthora* spread given the extensive nature of the track, then these two orchid populations are put at risk by the Three Capes Track proposal. The TNPA has been advised that mitigation by avoidance by 100 odd meters is not sufficient for highly threatened species known from a very small number of plants, and limited survey. Furthermore, mitigation should include a research program as part of the long-term conservation of these species that actually measures the impact of disturbance events (such as walking tracks, slashing, fire, others) actually have on threatened orchid populations.

Weeds

As noted in the DPEMP (p67) weeds are virtually absent from the existing walking tracks and the immediate vicinity of the proposed track does not support any significant populations of species classified as Declared Weeds under the Weed Management Act 1999. The construction of the track, overnight nodes and other infrastructure has the potential to introduce and facilitate the spread of weeds through the importation of material, the use of machinery and the creation of areas of disturbance. The construction phase represents the greatest risk, however once in place the track system will remain a potential vector for the spread of weed species, particularly via walkers shoes. Weeds have the potential to displace native species or possibly communities.

Phytophthora cinnamoni

As noted in the DPEMP (p67) there are a number of vegetation communities in the vicinity of the proposed Three Capes Track that are susceptible to *Phytophthora* due to the high proportion of susceptible individual species. The Three Capes Track passes through three highly susceptible communities while another three are considered to be of moderate or variable susceptibility. The

DPEMP notes that further spread of the disease continues to present a risk to these communities and that the construction of the track, overnight nodes and other associated infrastructure, the use of the track and operational activities post-construction all present a risk of spreading *Phytophthora*.

The TNPA believes that attempting to manage the spread of *Phytophthora* due to the Three Capes Track has significant risks that will have a potential significant and long lasting impact on the natural values of the Park, including potentially rare and threatened species of plant. As demonstrated by the complex set of management requirements described in the DPEMP to contain these risks this is a difficult issue to manage and difficult to enforce and monitor. In particular, the TNPA notes the following issues:

1. The Three Capes Track is an extremely high risk development in relation to *Phytophthora* as it is a linear development that runs through most of the Tasman National Park, and as stated in the *Phytophthora* Management Plan (Welling, 2010, 6 & Figs 3 and 4) *Phytophthora* is present in “most areas where the proposed Three Capes Track is to be located”. In addition there is infection already present at a number of locations along the new track sections (Welling 2010, 19) which will increase the potential for *Phytophthora* spread along the track.
2. As clearly stated in the *Phytophthora* Management Plan the proposed three Capes Track has the potential to spread *Phytophthora* through the Park and impact on many of the flora and fauna values:
 - *The park has diverse flora and fauna assemblages including 566 species of vascular plants, 120 species of bird, 10 reptile species and 27 terrestrial mammal species including the Tasmanian Devil, eastern quoll and eastern barred bandicoot (PWS, 2001).*
 - *A key threat to these values is *Phytophthora cinnamomi* root rot fungus. The development of a significant new walking track through the park has the potential to spread *Phytophthora* through the park (Welling, 2010, 1).*
3. Also as stated in the *Phytophthora* Management Plan (Welling, 2010, 1-2), human activity, including walking is the main risk in the spread of *Phytophthora*:
 - *Although the disease can be spread by natural means through water flow and by native animals such as wombats, the most common vector for spread, and in particular spread across longer distances, is through human activity (Rudman, 2004; O’Gara et. al., 2005), where the pathogen can be spread in soil on boots and on wheels and tracks of vehicles and machinery.*
 - *Infestations are most often recorded in areas of poor drainage and where soils have been disturbed, such as along creeklines, roadside drains, downhill from areas disturbed by machinery and along walking tracks (Rudman, 2004).*
4. The highest sensitivity areas where the track is located are on the western half of the Peninsula. In the TNPA’s view the proposed development should not be extended to this part of the Tasman Peninsula because of the extremely high level of risk due to this high level of sensitivity in this area and the fact that the proposed track will link these areas through areas of moderate sensitivity.
5. The lowest sensitivity areas of existing and potential track are the eastern coast of the Tasman Peninsula, including the section between Fortescue Bay and Pirates Bay. This provides support for the TNPA alternative iconic track option(see attached Report).
6. The key mechanism to avoid the spread of has been the routing of the track away from infested and high sensitivity area. However Welling (2010) indicated that it is not possible to do this for many sections of the proposed track, particularly on the western half of the Peninsula, hence second best management options need to be used. This results in an unacceptable level of impact and risk.
7. The secondary *Phytophthora* management prescriptions are a full 3 pages of text and comprise some 60 individual prescriptions for track construction and use (Welling 2010, 26-28). In the TNPA’s view this is a very extensive and complex list of prescriptions to manage and to have

respected. We argue that it is highly unlikely that these will all be respected when necessary and as a consequence there will be a very high, and unacceptable level of risk in relation to *Phytophthora* spread in the Tasman National Park due solely to the proposed Three Capes Track if it goes ahead.

8. The *Phytophthora* Management Plan (Welling, 2010) is a plan and not an EIA, and as such it fails to assess how effective the plan will be (even if fully adhered to) at controlling the spread of *Phytophthora* and what the risks are. This is critical missing information for assessing the impacts of the proposed development.
9. In the TNPA's view the risks of *Phytophthora* spread are understated in the DPEMP (pages 67-68) and do not reflect the risks stated in the *Phytophthora* Management Plan (Welling, 2010).
10. The DPEMP in discussing mitigation for *Phytophthora* spread mentions some hygiene requirements but these appear to be generic. The DPEMP therefore fails to include one of the Three Capes Track specific recommendations of the *Phytophthora* Management Plan which is to develop '*an additional hygiene plan to manage pest and disease risks such as weeds, P. cinnamomi, chytrid fungus, etc, during the construction phase*' (Welling, 2010, 25).

Eagles

Both wedge-tailed eagles and white-bellied sea eagles are listed as endangered species under both the EPBC and TSPA and a number of nests (18) of both species have been identified in the general area and proximity of the track. The entire area also consists of foraging habitat for both species. A number of potential impacts on these species due to the proposal have been identified in the DPEMP (sections 4.1.3.2; 4.1.4.2, Appendix F), with the key risk being disturbance, especially during the breeding season. In particular, the TNPA notes:

1. Both species are under pressure for finding/maintaining nesting sites due to a range of factors, including creeping coastal development, land-clearing and forestry activities.
2. National Parks were established for, and need to be, refugia for wildlife such as eagles. Where else are these birds to have the certainty of suitable undisturbed nesting sites, essential for the species' survival?
3. Both species are very wary of human presence during nesting and will readily desert or abandon a nest or alienation of habitat if disturbed. Indeed the DPEMP states that if an activity is directed conspicuously at a nest then the severity of impact increases dramatically (p104).
4. The DPEMP notes that eagles may behave antagonistically towards helicopters in proximity to nests during the breeding season and any repeated traversing of helicopters in close proximity to nest sites is likely to be detrimental. Despite all the assurances regarding 'mitigation measures' to minimise disturbance to eagles there is no certainty that the large volume of helicopter traffic during the construction phase of Three Capes Track would not either drive the birds away or result in breeding failure. There is no precedent for this level of disturbance in such an important area of eagle habitat.
5. Eagle breeding season falls within the peak visitor time for Three Capes Track. The expected 300 – 350 people in the Park on any given day during this time is vastly more than past and current numbers.
6. The DPEMP states that line of sight is a critical issues in the consideration of impact of a walking track or hut site on eagle nests, and the recommended protocol is that disturbances within 1 km line of sight of an eagle nest should be prevented. Eagles can spot humans from over one kilometre away. Ten known eagle nests are within one kilometre distance from the proposed walking track and four of those are within 500 kilometres from the track. This is completely unacceptable.
7. The DPEMP is particularly unassuring in relation to nest #1612 (in proximity to Tunnel Bay): "It is considered unlikely that the usage of the track by walkers will have an impact on this nest location. Which translates as "Fingers crossed!"
8. It is stated (4.1.4.2, p.107) that there will be annual monitoring of nests – but what will happen if it is found that the Three Capes Track has had a negative impact on nest occupation or productivity?
9. Will the Tasmanian public be informed as to the results of this annual monitoring?

10. Despite all the “mitigation measures” the DMEMP is not sanguine about the impact that Three Capes will have on both species of eagles: - “ The key risk of the proposal to these species is disturbance. Both species are particularly vulnerable to disturbance during the breeding season. Excessive disturbance may result in reduced breeding success through complete nest abandonment or temporary abandonment, leading to the death of the clutch or chicks, and through increased stress levels.” (4.1.3.2 p.93)
11. Despite these statements, it is stated that “the application of accepted mitigation prescriptions...will ensure that breeding success will not be impacted...”. However, no supporting evidence is provided to support this statement from the success of mitigation measures elsewhere.

The only assurance for the future of both species of eagles in Tasman National Park is that The Three Capes Track does not go ahead.

Aquatic Environment

Watercourses within the footprint of the Three Capes Track are in natural to near natural condition. The Conservation of Freshwater Ecosystems Values (CFEV) database has identified Denmans Creek and Tunnel Bay Creek as being of particular conservation significance, with both systems being in near natural to natural conditions (p75). While the DPEMP notes the aquatic environment with the park is largely free of introduced pests, weeds and diseases it is also stated the anthropogenic involvement in pathogen spread is likely to be highly significant. Wetlands are Cape Raoul and north of Arthurs Peak area also of conservation significance. It is stated that waste water disposal at the overnight nodes “is not expected” to have a significant impact but this does not ensure confidence.

Soils and Geoheritage

The soils at the site of the proposed Tunnel Bay and Maingon Creek overnight nodes are stated to be weakly structured and prone to erosion. While it is stated that care will be required to ensure erosion does not occur, how can this be guaranteed? There is also a risk for the disposal of waste water in contaminating the near pristine nearby water courses.

The TNPA also notes and remains concerned about the impacts on the geoheritage listed wetland east of Cape Raoul, as the track will go across it.

Fire Management

Despite the response plan proposed in the DPEMP to fire, the threats posed by fire remain an inherent risk to the Three Capes Track. Indeed, as noted the fire season in the Tasman National Park is longer than in other Parks, from September to March, and this season coincides with the high use period proposed for the Track. The isolated nature of the peninsula zones and the lack of escape in these areas due to the surrounding cliffs magnify the threat of fire to walkers. It is also recognized that the bushfire risk for the Three Capes Track cannot be completely mitigated and that the TFS and PWS will not be able to provide rapid or at times any response to bushfires. Given these facts, the TNPA remains concerned about the potential for serious injury or loss of life should a fire spread into this and other sections of the track. While the DPEMP acknowledges that evacuation is seen as an unreliable first option and states that the huts are to be used as primary refuges, and supposedly built to withstand bushfire attacks, as demonstrated by the loss of life in the recent Black Saturday fires in Victoria the use of buildings as refuges cannot be guaranteed.

The DPEMP states that the likelihood of fire for the western section of the route is high (and lower on the eastern section), and that the suppression capacity for this section varies between slow to moderate. Together with high risk associated with the spread of *Phytophthora* in this western section of the Park, the TNPA believes the track through this part of the Park should not proceed.

While the TNPA acknowledges the need to mitigate the threats posed by fire, we nevertheless remain concerned about the impacts posed by the need to i) construct additional emergency refuges and

suitable nearby helicopter landing locations, as this will add to the already large footprint of the infrastructure proposed to be built, and ii) undertake additional prescribed burning, as this may be detrimental to the natural values within the park which management is supposed to protect. As stated before, the proposal to build the Three Capes Track within the Tasman National Park will result in the management of the park shifting away from the protection of its conservation values to the management of commercial activities. This is inappropriate for a National Park.

Economic Benefits

The economic benefits of the Three Capes Track to the Tasman Peninsula economy stated in the DPEMP are over optimistic and in places substantially incorrect. For example, the figures quoted from the KPMG 2010 report of an additional gross output of between \$12.9 million and \$26.9 million per annum are substantially incorrect due to two errors in the interpretation of this report.

First, the economic benefits stated in the report are for a seven year period from 2010 to 2017, not annual benefits. This is clearly stated in the report on page 7 *"...the modelling is projecting whole period impacts that may need apportionment over time."* Second, the report uses two indicators of economic impact - Gross Output and Value Added. The DPEMP quotes the Gross Output figures. However, the report itself notes on page 12 that *"within this gross value is included the value of raw materials that, in most cases, have already been counted as part of gross output from earlier production. Therefore there is a tendency for Gross output figures to include some double dipping"*. The report goes on to state that the Value Added figure (as used by the Australian Bureau of Statistics) *"is the measure usually preferred when measuring economic impact"*. Using the Value Added figures, the KPMG report estimates that the additional economic benefits (in millions of dollars) of the Three Capes Track are as follows:

| Benefit Period | Conservative | | Optimistic | |
|----------------|--------------|--------|------------|---------|
| | Until 2017 | Annual | Until 2017 | Annual |
| Tasmania | \$44.07 | \$6.30 | \$92.73 | \$13.25 |
| Tasman Region | \$9.93 | \$1.42 | \$15.86 | \$2.27 |

The alleged annual benefits to the Tasman region are therefore seen to fall to between \$1.4 - \$2.27 million, and correspond more closely to the estimate in the Syneca report (\$2.4 million per annum).

The assumptions underpinning the economic modelling in the KPMG report also need to be questioned. This modelling assumes that there will be an additional annual increase in visitor numbers to the Tasman region of between 3-5 percent above the normal growth of recent years. However, this assumption is not substantiated anywhere in the report (where elsewhere has this occurred?) and also ignores the fact that the Tasman Peninsula already hosts over 30 day walks and several multiple day walks including the 4 day Tasman Trail. As such, people undertaking short walks are already included in the existing visitor numbers to the region and the analysis double counts these visitors when it assumes that such walkers will also make up the 3-5 percent increase in visitor numbers due solely to the presence of the Three Capes Track.

Finally, if the economic premise for the Three Capes Track proposal is to duplicate the economic benefits which have apparently flowed from the marketing of the Overland Track Experience, it is constructive to compare the predictions for the Tasman Peninsula with the actual changes in visitor numbers to the Cradle Mountain region in recent years. The KPMG report predicts that visitor numbers to the Tasman Peninsula will increase by between 3-5% per annum above a no Three Capes Track scenario, with a total increase in visitor numbers of between 9-16% over the first three years the track is operational. However, data published by the Parks and Wildlife Service indicates that compared to 2004-05 visitor numbers to the Cradle Mountain region actually decreased by around 7% the following year when fees were first charged for the Overland Track, and by 2007-08 visitor numbers were still down by 4%.

The Overland track has been in existence for over sixty years and has been heavily marketed as a world-class wilderness walk for many years. Despite this, current walker numbers are estimated to be around 8,500 per annum and have never reached the optimistic level of 10,000 walkers per annum set for the Three Capes Track. If these levels cannot be achieved for a walk which is often listed as one of the ten great walks in the world, why would we expect anything similar being achieved for a new walk which does not offer the rugged mountainous and wilderness experience of its rival, the Overland Track. The proposal is beginning to look like a white elephant, and given the current poor state of Government finances in Tasmania, with reduced funding to education and health, the priorities of this Government must be questioned.

Aboriginal Heritage

The DPEMP notes that the large natural landscape in the area is of significance as an Aboriginal landscape with its important material and cultural resources still evident. However, there has been a lack of consultation with the Tasmanian Aboriginal community and as a consequence the proposal does not have their approval. The TNPA notes the following concerns:

1. The assessment is incomplete and therefore inadequate to make management decisions as there has been no consultation with the Aboriginal community (Entura 2011, 12), hence can only be considered to cover Aboriginal sites and their scientific significance. Key values such as the raft of Aboriginal non-site values have not been considered, including Aboriginal landscape values, and only the scientific values of the Aboriginal sites have been considered (this is contrary to the *Burra Charter* (Australia ICOMOS 1999) approach).
2. Given there has been no consultation with the Aboriginal community, there is no indication that the community will support this development, including a permit under the Aboriginal Relics Act 1975, which will be required for the disturbance of the identified Aboriginal sites.
3. The Entura (2011, i) report comments that the proposed route has a generally high degree of landscape integrity. This indicates that the proposed development will both compromise the landscape integrity as it will be a long linear route running the length of this landscape, and impact on the Aboriginal landscape values of the Park.
4. The Entura (2011) assessment has not surveyed the full route (due to the Aboriginal community ban on such work imposed part way through the assessment. This is compensated for by undertaking a predictive assessment).
5. The TNPA questions how reliable the sensitivity assessment is given the limited site data is for the types of terrain assessed. This is of particular concern given the limited previous survey on the Peninsula away from the actual coastline (refer comment in Entura 2011, 29-30).
6. A significant part of the assessed terrain has been identified as being potentially sensitive yet the DPEMP fails to address if sites discovered during track work in these areas can be protected or whether the solution will be destruction of the sites by means of a permit, thereby resulting in additional values impacts?
7. The DPEMP is incomplete with respect to the Aboriginal heritage assessment as indicated in Entura (2011), but this is not clearly indicated in the DPEMP. Entura (2011, 47) states ‘the existing walking track to Cape Pillar and the proposed sections of new track along this route still require survey and assessment’ indicating through the following comment that it is inappropriate to leave this section unsurveyed - *“This area is known to contain Aboriginal heritage values, and should be surveyed as soon as practicable following lifting of the current community moratorium on Aboriginal heritage work. This will also enable the site patterning model to be tested on the ground”*.
8. An additional issue not made clear in the DPEMP is that the ground surface visibility for sites is extremely low (<10%) for most of the surveyed section (refer Entura, 2011, Table 6.1 & maps, pp42-44). There is therefore significant potential for additional sites to be located in the development corridor, hence a significant increased potential impact with respect to Aboriginal sites.
9. According to Entura (2011, 47) a total of six new Aboriginal sites were identified during the survey within or immediately adjacent to the study area, with a further three previously known

sites being relocated and investigated, and 1 additional new site found a short distance outside the study area. The new sites and the relocated sites along the Three Capes Track route are all found along the high coastal cliff top areas. Entura (2011, 49) make it clear that five of the newly located sites will be impacted by the proposed development.

10. TNPA question why Entura (2011, 49) only tables the newly located sites and not the three previously recorded sites?
11. Entura (2011, 82) comment “*The Three Capes Track development will impact on Aboriginal heritage values. ... best practice heritage management ... should involve the avoidance and conservation of Aboriginal archaeological sites*”. The TNPA is also concerned that neither Entura (2011) or the DPEMP (2011, 135-136) however provide a detailed assessment of the impact of the proposed development on these sites and the options for achieving best practice management, ie, avoiding the disturbance of these sites. The DPEMP comment makes no commitment to a particular approach and in fact indicates that in most cases the easiest developmental option and the least conservation oriented option will be undertaken – that of site destruction (through relocation or burial), in some cases because they are putting ecological values before Aboriginal heritage values. This is not considered an acceptable impact or impact mitigations approach for land of national park status and given that at least 3 of the sites that will be impacted are assessed by Entura (2011) as being of medium-high scientific significance.
12. Of particular concern is the fact that none of the specific recommendations for Aboriginal heritage impact mitigation contained in Entura (2011, 85-86) have been included in the DPEMP, and there is no discussion of the fact that there are detailed recommendations that have been ignored.

B. OTHERS ISSUES

Inadequacy of the DPEMP:

The TNPA questions the ability of the DPIPWE to reliably make the assessments it does in the DPEMP given that there are many aspects of the proposal that are still not fixed, including -

1. the actual location of the overnight nodes (only indicative locations are provided in the DPEMP;
2. the design (footprint, external cladding and finishes, height, etc) of the buildings;
3. where the commercial huts will be located and their design;
4. where the overnight tenting sites and facilities (toilet) will be located;
5. where the viewing platforms and access tracks will be located and their design;
6. whether there will be a jetty or pontoon at Denmans Cove and the design; and
7. the location of the section of track between Cape Raoul and Maignon Creek (to avoid the eagles nest)

Language Used

The language used in the document is often highly misleading and distorts the true impact of aspects of the development. For example, on page 27 it is stated that “*the huts and associated facilities will protect and present the values of their setting*”. This is obviously highly misleading – how can clearing the vegetation from a natural site and building a hut “*protect and present*” the values of the site when in fact these natural values have been destroyed?

Risks to values within the Tasman Park

The TNPA notes that DPEMP identifies a large number of risks to the natural values within the Tasman NP. The DPEMP also lists a number of mitigation options which are to be used during construction and operation of the proposal to minimize these risks. The TNPA also notes that the DPEMP concludes that

due to these measures the risks will be minimized and impacts will be insignificant. The TNPA however questions this assessment on the following grounds:

1. The DPEMP assessments are all based on the impacts to the footprint of the track and overnight nodes only, whereas in reality there is a high likelihood of the additional impacts based on i) the increased risk of bushfire given the increased human use throughout the Park., ii) from potential helicopter related incidents such as fuel spills, and in the worst possible case, helicopter crashes, and iii) the high probability that walkers will explore other areas of the park. Realistically, it is not possible for the PWS to ensure that there is no use of the area away from the track and overnight nodes. This potentially introduces a range of impacts including *Phytophthora*, weeds, and impacts on wildlife, including eagles.
2. No supporting research or statements are offered to indicate the extent to which these mitigating techniques are successful. For example, the PWS has a long history of managing other walking tracks in the State but no examples of the success in the use of mitigating techniques used in these other areas are offered. While an DPEMP should attempt to quantify the risks associated with any proposal, at the end of the day we are required to take the statements offered in the DPEMP relating to the Three Capes Track proposal on trust. For example, a range of mitigation measures related to the risk proposed by *Phytophthora* are listed in the DPEMP; however, no evidence is provided to indicate how successful these measures are at either eliminating or minimizing the related risks. The same can be said for the measures to be used to mitigate against the threats to flora and fauna in the park and the introduction and/or spread of weeds.

The combined level of risks across all aspects of the impacts is high. And although a number of risk management protocols are mentioned in the DPEMP, no evidence is provided about the utility or success of these measures. For example, in relation to the impact on nest #1612 (which is within 500m of the track) all that can be offered is the following weak statement – “*It is considered unlikely that the usage of the track by walkers will have an impact on this nest location*”. This is far from reassuring. Also, the statement that ongoing activity monitoring will allow for a management response is also weak. Once a nest is abandoned a management response is too late. Indeed, as if this point did not need illustrating, the TNPA has recently learnt that an eagle’s nest on Tasman Island, which contained three eggs, has recently been abandoned. We understand that there had been ‘joy’ flights coming right in close to the cliffs and that PWS have now responded to this event by putting a stop on all aircraft in the vicinity - at least for the time being. Sounds like closing the gate after the horse has bolted!!

Environmental Impact Monitoring & Control Limitations

Minimising the environmental impacts of the Three Capes Track development has required a complex Environmental Management Plan (EMP) with a large list of controls and restrictions on construction, maintenance and use. For example, it is stated that track work will cease if dens or nests are discovered for a number of species. However, the TNPA questions the ability of the requirements of the EMP to be observed. Reasons for this include -

1. the stringency of some requirements (eg, restricted helicopter use to avoid eagles nest);
2. the lack of provision in the DPEMP for ongoing monitoring of compliance and impacts generally (the commitments to monitoring are very limited), in particular in the long term;
3. the actual capacity of the PWS to physically monitor compliance (especially given recent cuts to the PWS which has seriously impacted on their ability to undertake field work);
4. the will to ensure compliance, particularly in the construction phase, when works are likely to be held up;

A core concern in relation to this matter is the lack of independent scrutiny. As the compliance enforcement agency is the developer in this case, there is absolutely no independence. This situation is made worse by same agency also being the approvals agency.

Consultation

On page 12 of the Tasmanian Reserve Management Code of Practice it is stated that “*Consultation with people interested in a reserve’s values is fundamental to good planning, decision-making and service delivery ...*”. On page 13 of the DPEMP it is stated that “*Initial public consultation on the proposal, at least in its conceptual stage, occurred through the approval process required for the revision of the 2001 Tasman National Park Management Plan.*” The TNPA questions the sincerity of this consultation process.

While the DPEMP states that 248 representations were received on the draft plan, it fails to mention that the vast majority of these (210) were opposed to the Three Capes Track and to changing the Tasman National Park MP to allow track to proceed. Of the 38 respondents who did not declare opposition to the Three Capes Track, only eight respondents gave unqualified support for the proposal, while another nine respondents gave qualified support for the proposal. Qualifications related to the large size of the development and associated infrastructure and concerns that campers, day walkers and locals have access to the park without having to pay fees. A further five respondents supported the concept of a long walk but without the ‘nodes’ or infrastructure. Overall, 85% of respondents opposed the Three Capes Track proposal and only 6.8% of respondents offered any support for the proposal.

Sixty-one submissions were received from residents of the Tasman Peninsula, of which 50 respondents were opposed to the Three Capes Track while only four offered qualified or support (the remaining submissions do not refer to Three Capes Track) Of the eight submissions received from tourist operators on the Tasman Peninsula, all except PATTA and PAHSMA were opposed to the Three Capes Track.

The DPEMP also states that a number of meetings have been held with Bushwalking Tasmania and the TNPA, though again no mention is made of the fact that both these groups have voiced considerable opposition to aspects of the proposal. In this regard, the DPEMP can be seen as being very misleading in how it dealt with this issue.

Amendment of the Tasman National Park Management Plan 2001

The DPEMP states that the all components of the Three Capes Track proposal will be required to be in accordance with the management plan for the Tasman National Park Management. This is a somewhat hypocritical statement, as this plan had to be specifically altered so that the infrastructure associated with the Three Capes Track proposal could be placed within the Park. Furthermore, as outlined in the previous section, this change was made despite the overwhelming opposition voiced through the public submission process. One needs to question the utility of management plans for reserved areas if, despite originally being adopted after a period of public consultation, they can be changed essentially at will by any government to allow some favoured development to be placed within a park. We have seen this before when the management plan for the Tasmanian Wilderness World Heritage Area was arbitrarily altered to allow the accommodation facility proposed by David Mariner to be approved (those this development has not proceeded).

Trust Us!

There already noted are a number of aspects about the final design of the proposal which are yet to be determined. For example, the design of the accommodation nodes and huts is still subject to the outcome of the final mitigation design requirements and compliance with AS 3959-2009. Also, the final layout and size of the BPZs still need to be determined. It needs to be questioned why the release of the DPEMP for public comment was not delayed until these issues were resolved and so that the public could comment with more clarity on the final design. Without this clarity the public is in essence being asked to take the PWS on trust, when actually there is no clear understanding of exactly what is being proposed and what may be the final impacts. The TNPA argues that the period of public comment on the DPEMP should be delayed until these important issues are resolved.

As stated above, there is also a high sense of trust associated with the mitigation of impacts. For example, the impacts on several TSPA listed species “*is not considered to be significant (p117)*”.

Again, this is a subjective assessment which is not backed up by any substantive evidence. We are also ensured that management measures will “*minimize the risk of weed introductions*” and that “*the risk of additional spread of *Phytophthora* ... is minimized*”. Statements about minimal impacts are also offered in relation to other impacts, eg on the marine environment, in relation to the spread of pests and pathogens. However, what does ‘*minimise*’ mean, and what outcomes are considered most likely based on observations from other places where walking tracks have been introduced. The assessment of impacts appears to be arbitrary and subjective, and lack any quantitative assessment that allows the reader to judge the actual impacts deemed most likely.

Alternatives

The TNPA have recommended two alternatives to the Three Capes Track – the initial Two Capes Iconic Walk (recommended mid-2008) and the revised version of this, the Great Tasman Coastal Experience (recommended mid-2011). Both these alternatives significantly reduce the environmental impact of the Three Capes Track proposal, including most of those indicated in the Three Capes Track DPEMP, by significantly reducing the need for new tracks in currently untracked areas and reducing the impacts from the overnight nodes. A copy of the TNPA’s *Great Tasman Coastal Experience* alternative proposal is attached for your information (Attachment 1).

To date the Tasmanian government has refused to consider any alternatives, including the two options proposed to them by the TNPA. The TNPA firmly believes that, given the potential impacts of the proposed Three Capes Track development and its location within a national park, lower impact options should be considered before approving the Three Capes Track.

Probity

Finally, the TNPA questions the probity of the current proposal and how it is being assessed. How is it that the PWS can be the developer, assessor and regulator with absolutely no independent overview or check?!

Conclusion

The TNPA, believes that the Three Capes Track proposal is an inappropriate development for a National Park given the primary conservation goals of national parks, the large scale of the infrastructure proposed (the largest of any within a national park in Australia or elsewhere away from motorised access) and the widespread nature of the potential impacts throughout the whole Park (because the Track is an extensive development), not to mention the inappropriateness of depending on helicopters for construction and maintenance for the life of the track development in this present day where carbon emissions and dependence on fuel are luxuries.

The TNPA has been raising these concerns with the Tasmanian Parks and Wildlife Service, DPIPWE and the relevant Minister since 2007 when the Three Capes Track Feasibility Study was released, but the government has not responded to our key concerns.

The present proposal is about building nine new large huts, two jetties, a plethora of new access roads, car parks, toilets, and pedestrian tracks to a very high standard – all for the comfort of fee paying visitors. It is not about preserving the natural, primitive or remote character of the Tasman National Park. The reason that such a large scale development has not occurred previously in Australia is because it has not been seen as appropriate for conservation status land. This development, if it gets approval, will not be a rare occurrence in Australia, but we have reason to believe it will become adopted throughout Australia, in the quest for increased recreation and economic development opportunities.

If this proposal is allowed to go ahead it would appear that our National Parks are to be managed primarily as tourist theme parks instead of for the natural values that they were originally set side to protect. The amount of infrastructure at each overnight nodes is huge (almost a small village) and

placement of five of these nodes (together with an additional four commercial nodes) throughout the park (which is just a narrow coastal strip in many places) will dominate the landscape.

The Tasman Peninsula has a lot to offer. With some of the most exhilarating coastal scenery in Australia and around 35 existing day walks, the Three Capes Track is not required to increase visitor numbers to this region or to enhance the visitor experience. What has been missing is a holistic marketing strategy which entices visitors to extend their stay beyond a visit to Port Arthur.

A ‘win-win’ situation for tourism on the Tasman Peninsula and the conservation values within the Tasman National Park is to market the day walks, sea adventures (cruises, kayaking, fishing) and other experiences offered by the region with guests extending their stays in the hotels and bed-and-breakfasts outside the park.

This is the type of extended walk that experience overseas and elsewhere in Australia, for example the Great Ocean Walk in Victoria, shows people greatly prefer. Having people spending all their time on a single walk and staying in privately owned huts within the park will not spread the economic benefits around to all as is desired. Indeed, a unique advantage of the Tasman Peninsula is that there is a community living in juxtaposition with the Tasman National Park and ideally a mutually beneficial relationship between tourism operators should be nurtured rather than a competitive one.

The TNPA supports appropriate tourism based projects in Tasmania and supports the regional benefits that will flow from such projects. However, the TNPA argues strongly that these same benefits can be achieved by placement of such projects outside the boundaries of Tasmania's National Parks. The development of very successful tourist nodes outside National Parks at Strahan, Cradle Valley and Coles Bay, to name only three, validates this argument

The Tasmanian National Parks Association is therefore calling on all levels of government to rethink this badly conceived proposal and redirect the promised funds to upgrading the existing walking tracks, facilities and infrastructure on the Tasman Peninsula and developing an integrated marketing strategy around a common theme (such as the Tasman Great Coastal Walk) so that the flow of benefits is optimised and more widely dispersed.

THREE CAPES TRACK PROPOSAL, TASMAN NATIONAL PARK, TASMANIA – SUMMARY OF IDENTIFIED ISSUES

1. What is proposed is not a standard National Park ‘walking track’ / ‘walk’ experience (as the name suggests), but one with highly developed infrastructure / infrastructure requirements not appropriate in a National Park whose purpose is primarily conservation, and in particular not appropriate in a relatively small National Park.
2. The proposed ‘track’ is very extensive (in effect running the length of the Tasman National Park), hence leaving no part of the narrow coastal corridor that comprises the Park unaffected.
3. It is a large commercial size development (with an overall development footprint of 17.61 ha) which can be considered aggressive development in a national park.
4. The scale of infrastructure (the track, overnight nodes/mini-villages with a 48 bed hut, commercial hut, toilets, heli-pad, viewing platforms) is also inappropriate in a National Park away from road heads.
5. The proposed high level of track construction (gravelled, extensive stone edging and stone steps – in a gardenesque/urban park style) is also inappropriate in a natural area, particularly given its length.
6. The DPEMP fails to consider the fundamental importance of wildness (or wild character) for the Tasman National Park and the impact of the Three Capes Track on these values. Indeed, the placement of the overnight node at Lunchtime Creek and the construction of the highly engineered track within the high quality wilderness zone of the Tasman National Park are in breach of the management objectives of both the National Parks and Reserves Management Act 2002 and the Tasmanian Reserve Management Code of Practice to i) preserve the natural, primitive and remote character of wilderness areas, and ii) avoid activities in areas of high quality wilderness that could detract from the wilderness quality.
7. Based on the recently released DPEMP, there will be identified environmental impacts, acceptable perhaps on private land, but not appropriate in a National Park. These are:
 - impacts on geoheritage in a wetland east of Cape Raoul (the track will go across it) (identified in the DPEMP)
 - impacts to at least four Aboriginal sites (identified in the DPEMP)
 - impacts on identified wilderness quality (not identified in the DPEMP).
8. Based on the recently released DPEMP, there will be additional potential environmental impacts, and these matters require much more careful assessment:
 - impacts on the landscape and setting values of Port Arthur Historic Site, a World Heritage Area;
 - probable impacts on sea eagles and wedge tailed eagles with nests close to huts and the track in a number of cases;
 - probable impacts on the populations of two EPBCA listed orchids (*Prasophyllum apoxychilum* and *P. castaneum*) occur in the Ellarwey Valley and the track passes directly through one of the very few known sites where these species occur (although it has been re-routed to avoid the main known habitat) as the response of orchids such as these to disturbance such as walking track is very poorly known; and
 - potential impacts to geoheritage values as the geomorphic history, hence geoheritage, of the Tasman Peninsula has never been studied (hence it is difficult to identify the geoheritage values that will be impacted through a track survey).

9. There are very high potential environmental risks (particularly for a National Park) from the proposal, which include-
 - to rare and endangered plant species,
 - to the sea eagles,
 - to the landscape values of the Port Arthur Historic Site World Heritage Area,
 - through *Phytophthora* spread, and
 - through critical potential events such as fire (likely to be increased through 10,000 walkers a year in this environment) and helicopter crashes (required for regular servicing of the huts and construction of the huts and track).
10. Many of the above impacts are underplayed in the DPEMP which fails to realistically assess the impacts of 10,000 walkers a year on the Track, who will invariably go off track, particularly in search of coastal views. The DPEMP argues it can mitigate many of the above impacts but this requires numerous very complex mitigation actions that are unlikely to be observed, particularly in the longer term.
11. The proposal relies on helicopters for all supply and removal of material (during construction and once operational). This reliance on helicopters is inappropriate for the following reasons –
 - noise impacts which also impact the natural and wild quality of the Park
 - potential impacts on sea eagles
 - potential impacts on the Port Arthur Historic Site)
 - significant risks to the Park and adjacent marine environment in cases of helicopter fuel leaks or crashes
 - irresponsible and undesirable high fuel use in a time when carbon emissions are of extreme concern.
12. The DPEMP does not provide details on the exact location and design of the 48 bed walker huts, the viewing platforms, the locations of the commercial huts, and the jetties/pontoon at Denmans Cove. This has significant potential impacts on a range of environmental aspects and needs to be detailed in the DPEMP and not left open.
13. There are also a number of difficult aspects that have poorly thought out mechanisms to address and no consideration of their impacts – these are 1. what happens if access is not provided through private property in the Maignon Bay area; and 2. the need to transport walkers around to Stinky Bay and have them walk in to Denmans Cove in poor weather; 3. back up boat (or other) services to transport people across Long Bay and out of Fortescue Bay.
14. The DPEMP fails to take into account the impact of walkers outside the permit period.
15. The TNPA is concerned about the ability of the PWS to undertake the necessary environmental monitoring on a long term basis (particularly given the difficulty they have carrying out routine monitoring of other similar infrastructure in Tasmanian Parks and given the current low funding/resourcing of the PWS).
16. There is no commitment in the DPEMP that the full Three Capes Track will not become operated and/or owned by a private commercial operator, which would effectively privatise (exclusively) most of the Park. The DPEMP needs to be clear that the PWS will continue to operate the Track (for at least the 48 walkers a day).
17. What happens if the maximum number of walkers (10,000 pa) does not occur after a few years – which is in our view highly likely (see below)? Presumably the development will be neither affordable nor viable - in which case the PWS will be left with a huge white elephant and a huge irreversible impact on a valuable natural conservation area. The DPEMP needs to state what will happen in such a case.

18. Although touted as an ‘iconic coastal walk’, the walk itself has limited coastal views, while the use of day walks and other existing suitable tracks with significant coastal views and which would only require some upgrading are being largely or totally ignored (eg, the existing track from Pirates Bay to Fortescue Bay).
19. Recent studies into walker aspirations all show that walkers want short (3-4 day) overnight walks, not the 5 night / 6 day walk that will be provided by the proposed Three Capes Track – so why is all this money being spent and why so many impacts and risks for something that is not wanted!
20. Much greater economic return to the Tasman Peninsula could be generated by promoting day walks and/or providing a shorter overnight walk (with consequently less environmental impact) where walkers primarily use private commercial accommodation outside the Park.

All of the above concerns would be addressed by the implementing the TNPA’s alternative proposal. This alternative would also not have required the *Tasman National Park Management Plan* to be altered as the Three Capes Track proposal has done.

ATTACHMENT 4

Letter to Hon Lara Giddings MP, Premier of Tasmania; re: making the Three Capes Track a Project of State Significance



tasmanian conservation trust inc



Hon Lara Giddings MP
Premier of Tasmania
C/- Parliament House
Hobart Tas 7000

14th February 2012

Dear Premier,

Three Capes Track Project

The Tasmanian Conservation Trust (TCT) and Tasmanian National Parks Association (TNPA) write to formally request that you urgently take action to have the Three Capes Track (3CT) development proposed in the Tasman National Park declared a 'Project of State Significance' under the *State Policies and Projects Act 1993*.

The 3CT project is currently subject to the Parks & Wildlife Service (**PWS**) internal assessment process and, if approved, will require a planning permit from the Tasman Council. The project is a significant development and is regarded as having regional and statewide importance in terms of tourism promotion and revenue. The outcome of the assessment process will have significant implications locally, and more broadly in terms of the management of national parks in Tasmania.

Given the scale of the project and the significant ramifications for reserves management throughout the State, it is our strong view that the 3CT development requires greater integrated and more independent scrutiny. For all the reasons set out below, we believe that the project is eligible for, and warrants, declaration as a Project of State Significance (**PoSS**).

The public comment period in relation to the Development Proposal and Environmental Management Plan (**DPEMP**) for the 3CT proposal closed on 23rd December 2011 and we anticipate a decision from PWS regarding the project very soon. Therefore, we request that you act urgently to ensure that the proposal is declared a PoSS and its potential impacts are subject to the most rigorous assessment.

Project of State Significance

Section 16 of the *State Policies and Projects Act 1993* provides that a project will be eligible to be a PoSS if it possesses at least two of the following attributes:

- (a) significant capital investment;
- (b) significant contribution to the State's economic development;
- (c) significant consequential economic impacts;
- (d) significant potential contribution to Australia's balance of payments;
- (e) significant impact on the environment;
- (f) complex technical processes and engineering designs;
- (g) significant infrastructure requirements.

We consider that the 3CT project possesses at least three of those criteria, given the significant infrastructure requirements intended to support the recreational facilities, significant environmental impacts and the potential direct and indirect economic benefits that are being used to justify the proposal. In particular:

Significant contribution to the State's economic development and consequential economic impacts

PWS reports have consistently justified the 3CT project on the basis that it will bring significant revenue to Tasmania through 'nature based tourism'. The Tourism Industry Council of Tasmania recently described the proposed 3CT development as "the most significant tourism infrastructure development on the drawing board in Tasmania" (cited in *The Mercury* 11/1/2012).

As outlined below, we dispute the scale of economic returns projected to flow from the 3CT development. However, we acknowledge that a well promoted tourism walk on the Tasman Peninsula can have major economic benefit to the state.

Significant impact on the environment

Tasman National Park is reserved on the basis of its outstanding natural and cultural values, and is required to be managed to protect and promote those values. The scale of the proposed 3CT, which will extend throughout the length of the park, including currently undisturbed areas, and intensify damage at already disturbed sites, will have significant environmental impacts.

The DPEMP highlights some significant environmental risks associated with the proposal, such as:

- Impacts on Aboriginal sites;
- impacts on threatened eagle species (including White Bellied Sea Eagles and Tasmanian Wedge-Tailed Eagles);
- Adverse impacts on wilderness values;

- Damage to rare and threatened plant species (including the nationally listed orchid species, *Prasophyllum apoxychilum* and *P. castaneum*); and
- Potential spread of *Phytophthora cinnamomi* throughout large areas of the Park.

The DPEMP also ignores or underestimates other potentially significant impacts (e.g. Aboriginal community heritage values, impacts on the landscape and heritage values of Port Arthur). A number of detailed design and management matters have not been addressed in publicly available documentation⁵, which also make it extremely difficult to fully assess the environmental impacts.

Given the elevated conservation values of a National Park, it is imperative that all potential environmental risks are adequately identified and assessed. Further details regarding our concerns associated with the proposed development are outlined in the attached submissions.

Significant infrastructure requirements

The 3CT proposal is by far the largest development in a National Park in Tasmania (and Australia) away from a road head or other mechanised access route. Infrastructure requirements for the proposal include a large commercial facility, nine large huts, two jetties, a number of new access roads, car parks, toilets and over 60km of maintained pedestrian tracks with highly engineered lookouts and viewing points.

Need for comprehensive, independent assessment

Objective assessment

TCT and TNPA have concerns regarding the probity of the current internal assessment process. PWS remains an active proponent of the 3CT project, compromising its ability to objectively assess the proposal or to regulate its implementation if it was to be approved. We believe that it is entirely inappropriate for a project of this scale and impact, involving a considerable investment of public funds, to not be subject to rigorous, independent assessment.

If it decides to proceed with the 3CT proposal, PWS will require a permit under the *Tasman Planning Scheme 1979*. Reliance on this process as a rigorous, independent review of the project is misguided as:

- The *Tasman Planning Scheme 1979* is outdated and provides negligible capacity for Tasman Council to assess issues such as impacts on natural and cultural values in the National Park;
- Tasman Council is under-resourced and lacks internal expertise to review the range of highly technical issues related to the project;
- Tasman Councillors have been heavily lobbied by PWS over the last 4 years and have indicated strong support for the project (prior to any detailed application being received).

Assessment by the Tasmanian Planning Commission under the PoSS process would allow for a rigorous, objective and transparent overview of the various issues associated with the 3CT proposal.

⁵ Significant issues currently left un-resolved include the design (including height and finish) of the accommodation buildings; their actual location; the final size of the Bushfire Protection Zones; the design of the jetty/pontoon at Denmans Cove; the need to use private property in the Maignon Creek area to bypass an eagle's nest and a professional visual impact assessment (which may have implications for the values of the World Heritage listed Port Arthur Historic Site).

Economic benefits not substantiated

We believe that economic projections of benefits of the 3CT for the regional economy are, at best, optimistic and, at worst, substantially incorrect. For example,

- Estimates are based on 10,000 walkers using the track annually, yet there has been no analysis to indicate that level of participation. The assumption that the proposed 3CT will be equally or more popular than the the Overland Track remains unsubstantiated.⁶
- The economic modelling in the KMPG assessment assumes an additional annual increase in visitor numbers to the Tasman region of between 3–5% above normal growth of recent years, despite data indicating that the introduction of fees often leads to a reduction in visitor numbers.⁷

Given the level of public investment proposed for the 3CT, we believe that it is essential that the alleged economic benefits of the project are rigorously assessed by an independent body. Such an assessment should not be undertaken internally by the proponent, and is outside the scope of issues that Tasman Council could consider. Assessment of the 3CT project as a PoSS would provide an opportunity for greater scrutiny of claims regarding the economic benefit of the project.

Community concern

The 3CT project is of considerable community interest, and the PoSS process provides the most appropriate forum in which to encourage public participation in the assessment of potential impacts.

The review of the revised *Draft Tasman National Park Management Plan* (to enable the 3CT development) by the Resource Planning and Development Commission in 2008 attracted an unprecedented 246 submissions. Of those submissions, 209 were specifically opposed to the proposal and only 8 gave unqualified support for the proposal.

The TNPA has received some 747 postcards and an additional 270 online petitions (with some, but not significant, overlap) from Tasmanians, a significant number of interstate visitors, and international visitors opposing the current proposed Three Capes Track development on the basis of its large scale and high environmental costs, and calling on the Minister to consider more environmentally sensitive options.

Consideration of alternatives

A range of existing studies consistently indicate that long multi-day walks, such as the 3CT, are not what tourists are seeking. For example:

- The 2006 study by Planning for People (J. Mackay 2006) which is the scoping study on which the proposed Three Capes Track development is based⁸;

⁶ Just 7050 people paid to walk the Overland Track during the period November 2006 to April 2007 (the latest figures available), even though up to 10,000 are permitted. This is despite the Overland Track being in existence for over sixty years and being heavily marketed as a world-class wilderness walk for many years. This calls into question the PWS claim that the Three Capes Track will attract 10,000 walkers paying a \$200 fee (a higher fee than the overland Track) during the same time period.

⁷ The PWS figures indicate that compared to 2004–05, visitor numbers to the Cradle Mountain region actually decreased by around 7% following the introduction of fees for the Overland Track, and by 2007–08 visitor numbers were still down by 4%.

⁸ This study in fact recommended a short overnight walk catering for small groups, and that allowed synergistic integration with other tourism opportunities on the Tasman Peninsula.

- The 1995 government inter-agency feasibility study of long distance walking tracks on the Tasman Peninsula (2001 Tasman NP Management Plan, p 45)⁹.
- The findings from major current popular walks such as the Great Ocean Walk in Victoria.

These studies clearly indicate a preference for shorter, less structured walks.

TNPA and TCT maintain that a high impact, multi-day walk such as the 3CT is not the best option for increasing visitor number or enhancing tourism experiences on the Tasman Peninsula. Instead, efforts to improve the over 35 existing day / overnight walks and a holistic marketing strategy for the region would reap similar economic benefits with considerably less impact, less capital investment and lower ongoing maintenance costs. We enclose a copy of the TNPA's proposed alternative – *The Great Tasmanian Coastal Experience* – for your consideration.

The current assessment by PWS has neglected to address this or other alternative proposals to the 3CT development, all of which have been projected to have better economic and environmental outcomes. Assessment of the project as a PoSS should require viable alternatives to be given substantive consideration.

Integrated Assessment Guidelines

For all the reasons outlined above, the TCT and TNPA encourage you to seek a declaration of the proposed Three Capes Track project as a PoSS, and to ensure that the following matters are considered in any Integrated Assessment of the project:

- Comprehensive review of the economic, environmental and social aspects (both benefits and cost), including at the regional and state level.
- The history of the Three Capes Track proposal, together with prior information and assessments; and early public representations
- Long term business planning, including commercial opportunities.
- Long term management, including rehabilitation in the event the proposal fails to be self-supporting economically.
- The ability of the PWS to manage the high level of environmental risk engendered by the current proposal.
- The suitability of the current Three Capes Track proposal as compared with other options, including the TNPA's *Great Tasmanian Coastal Experience* alternative or something along similar lines developed in consultation with the relevant stakeholders.
- Accurate assessments of current and aspirational walker and nature-based tourism interests and aspirations and environmental concerns.

We look forward to your consideration of our request and to a favourable response.

We are happy to meet with you to discuss this matter further if required. Please direct communication to both organisations.

⁹ Relevant findings being that – 1. there is a lack of current demand and a need for greater research in determining future use levels; 2. the cost of infrastructure development for the trail would be very high; and 3. there may be significant environmental impacts associated with increased use in areas currently with low levels of use'.

Yours sincerely,



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Enclosed:

- TCT submission to the 'Draft Three Capes Track Development Proposal and Environmental Management Plan', 23 December 2011.
- TNPA submission to the 'Draft Three Capes Track Development Proposal and Environmental Management Plan', 23 December 2011.
- TNPA's submission on the 'Tasman National Park and Reserves Draft Management Plan 2008', 11 March 2008.
- Great Tasman Coastal Experience, TNPA Report, August 2011.

ATTACHMENT 5

Letter to Hon Lara Giddings MP, Premier of Tasmania; re: Additional information in relation making the Thee Capes Track a Project of State Significance



Hon Lara Giddings MP
The Premier and Treasurer
Level 10, 10 Murray St
Hobart 7000

14 August 2012

Dear Premier,

Three Capes Track Project – Further Information

Following from our letter of 14 February 2012 requesting you to make the Three Capes Track (3CT) development in the Tasman National Park a Project of State Significance, and following from our meeting with you of the 3 July 2012, and our follow-up letter of the 10 July 2012, **we wish to advise you of additional matters in relation to the 3CT development project that we have become aware of, and which strengthen, we believe, the case for independent review of the development and approvals process for this development.**

Given that the 3CT development now has all the necessary approvals to proceed, we would ask that you, as Premier, review our application to have the 3CT development assessed as a Project of State Significance (PoSS) and other relevant matters as raised in other correspondence (including our comments below) and at our meeting with you, and make a determination on the need for an independent review process for this project.

New Information

Tasman Council Development Application

On 23rd June 2012, the Development Application for the 3CT development¹⁰ was advertised for Public Comment. In reviewing the documents submitted by the PWS for the Development Application, the TNPA ascertained that –

1. the DPEMP submitted for the Development Application is the same DRAFT DPEMP that was put out for public comment by the PWS in late November 2011 (ie, 8 month earlier);
2. the only new data were architectural drawings for the proposed accommodation complexes and the two jetties, and specifications for public car parking areas, with still no information about viewing platforms and potential safety barriers, or and the finishes for the accommodation complex buildings; and
3. the Development Application only commits to constructing the 3CT between Denmans Cove and Fortescue Bay initially (by late 2015), makes no commitment to completing the 3CT as proposed in the Development Application and DPEMP, and has no information on how the shortened walk will operate and no time frame for full completion.

The Tasman Council approved the Development Application (on 25 July 2012), without any conditions that indicate that they recognise the development is in a National Park and without any comment on the proposed partial build. The TNPA and TCT have decided not to appeal this decision on the basis of legal advice that the Tasman Planning Scheme is inadequate in relation to matters such as these (ie, developments in conservation areas).

PWS Internal Approval Under the RAA Process

At our meeting with you in July, we raised with you our concerns about the internal approvals process for the 3CT, noting that there had been no formal response as to how the public submissions sought on the draft DPEMP would be treated (standard procedure) and also that the TNPA had been denied a copy of the DPEMP that was the basis for the internal PWS for the project (given in February 2012).

Given this, and given that the November 2011 DRAFT DPEMP was submitted with the Development Application to the Tasman Council, we can only assume that the February 2012 final internal PWS approval was also on the basis of the 2011 DRAFT DPEMP, and the PWS have been trying to hide this fact from the public.

Analysis

The use of the November 2011 DRAFT 3CT DPEMP as a basis for final local government and state government (PWS Reserve Activity Assessment) approval is of extreme concern to us. It flouts due and conventionally accepted process. In our view this process would not be accepted, particularly in relation to the RAA approvals process, by the PWS if the development proponent was a private entity, so why is it acceptable where the PWS is the proponent?

To use the same DRAFT 3CT DPEMP for approvals 4-8 months after it was completed and with no apparent change (and still titled as the 2011 DRAFT 3CT DPEMP) suggests a flagrant case of fast tracking, and a complete disregard for the environmental concerns that have been raised repeatedly over the last five years, including in the

¹⁰ *Development Application To Tasman Council For The Three Capes Track Tasman National Park, Safety Cove State Reserve, Crown Land and Titles 228905/1, 210148/1 and 159762/2, June 2012 (Mercury, 23rd June 2012).*

public submissions made on the DRAFT DPEMP in response to the PWS request for public comment in November 2011.

We are appalled that the PWS has asked for public comment, and then chooses to ignore it completely. We believe that this in itself shows a complete disregard for process, as well as a regrettable lack of genuine interest in community views and a disregard for the amount of time and energy that calls for public comment create for the community.

We are also particularly concerned about the almost hidden comment in the Development Application that indicates that initially only the eastern half of the walk will be constructed. This is the only place that this has been mentioned publically and, other than for noting a completion date for this work (late 2015 - previously the completion date for the full track), there is no final completion date set for the full walk and absolutely no detail provided on how this 'half walk' will operate. For example, there is no information on how people will start the walk (the current proposal suggests walkers will have to make an artificial boat leg start or walk in on a minor foot track that is not part of the 3CT development), how and from where the entry will be managed, or what walkers will be charged for this significantly reduced walk.

This 'half walk' proposal also has a number of significant implications that are also not raised or discussed. These include, for example, the presumably reduced income (on which ongoing management, including the track and hut infrastructure is dependent), for employment, and for other income to Tasmania.

We can only assume that this 'half walk' option represents what is affordable, but that the government, having promoted the full walk and its benefits, is not prepared to be honest about this and be open about the consequences. Again, a poorly informed, unevaluated staged approach, or possible partial build, is not something that a private developer would be allowed to get away with, yet it appears to be acceptable when the proponent is the government?

Conclusion

As we have indicated previously, the whole process for the implementation of the 3CT development has had the most minimal regard for due process that has been possible while maintaining a semblance of legality. In our view in this case, the PWS has also abused the privilege it has of an internal approvals process and has failed to act honestly in this matter. The most recent actions (that we note above) that see the final approvals being based on an unmodified and inadequate draft DPEMP, only cement this concern.

In our view, the process that has been used for developing and approving the 3CT proposal is one which, while not being obviously corrupt, has in essence corrupted established process to achieve the outcome that government desired. It is in essence a farce. If nothing is done to address this matter, the community can have no faith in the PWS' ability to manage the conservation estate in its care, or in the government's governance in environmental and development matters.

We therefore, repeat our earnest request to you as Premier, to have the 3CT development proposal reviewed independently and, given the environmental issues

associated with the development and the unexplained and undetailed possibility that only half the proposed development might be ultimately built, to include assessment of alternative proposals, including the TNPA alternative.

Yours sincerely,



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